
	<p>Work Instruction</p> <p>Waste Disposal Activities</p> <p>*** Uncontrolled *** *** DOCUMENT *** Please destroy this document after use</p> <p>Reference Documents: ENVIRONMENTAL & ENERGY POLICY, HS2.03.14, YS2.03.612</p>	
<p>Process Owner: Robert Kennedy *</p> <p>Updated by: Sharon Environmental Fisher</p> <p>Effective: 03/04/2022</p> <p>Scope: HDMC</p> <p>ISO Clause: 8.1 - Operational planning and control</p>		<p>Site: York</p> <p>Dept: Environmental</p> <p>Group: ALL</p> <p>Number: YS2.03.637</p> <p>Version: 27</p> <p>Status: Active</p> <p>Legacy Number:</p>

PURPOSE:

- . To provide general awareness to those who generate waste to comply with applicable federal, state, and local regulations; and agencies (EPA, PADEP, Springettsbury Township, DOT, etc.)
- . To define the types/classifications of waste generated as Medical, Municipal, Residual /Non-Hazardous, Hazardous, Universal, or To Be Determined.
- . To provide information on the waste streams and classification to properly label the waste container, which may include in-house containers and empty containers.
- . To ensure proper preparation of waste containers for shipment/transportation and disposal according to federal, state, and local regulations.

SCOPE: Covers employees, contractors, etc. who generate waste at York Vehicle Operations except for transportation containers.

RESPONSIBILITY: All employees.

DEFINITIONS:

BLDG. - Building	ID - Identification
DOT - Department of Transportation	PADEP - Pennsylvania Department of Environmental Protection
EHS - Environmental, Health and Safety	SDS - Safety Data Sheet
EPA - Environmental Protection Agency	WH - Waste Handler
HWSA - Hazardous Waste Storage Area	WI - Work Instruction

PROCESS:

1. OVERVIEW:

1.1. What is a waste?

- Materials/Chemicals from an industrial process that no longer have a useful life or are no longer needed
- Products/materials/chemicals that are expired
- Spent Products/materials/chemicals
- Materials that are not reclaimed

1.2. What waste types are at the plant?

Five waste types are municipal, non-hazardous /residual, and hazardous, universal, and medical wastes
 Examples of the waste types generated at the plant are listed as follows:

- . Municipal waste may include office paper and cafeteria trash
- . Non-hazardous waste or residual waste may include general plant trash, cardboard, black and color powder paint, paint sludge, scrap metal, wood and abrasives. See Section 2.4.1.

- Hazardous wastes may include paint, solvents, and the associated debris and PPE, acids and alkalines. See Section 2.4.5.
- Universal waste may include batteries and lamps. See Section 2.4.9.
- Medical waste includes typically materials contaminated with blood. See Section 2.4.11.

2. GENERAL REQUIREMENTS:

2.1. Waste Stream Consistency

- It is important to keep our waste streams consistent. Waste stream in general must be sampled and approved for disposal at an appropriately permitted facility.
- Any significant deviations in the composition of these approved waste streams can cause surcharges, rejection and return of shipment and the possibility of fines and penalties. This may occur if waste is placed into improperly labeled containers or improperly co-mingled together.

2.2. Determination of Hazardous Waste Classification

- 2.2.1. Waste is hazardous if it is a characteristic or listed waste. Wastes not considered characteristic or listed hazardous wastes are residual, municipal or universal.
- 2.2.2. Characteristic: One way to determine if the waste is a characteristic hazardous waste is to collect a sample and analysis it to see if it has one or more of the following properties: ignitability, corrosivity, reactivity or toxicity.
- a. Ignitability - wastes that readily catch fire and have a flash point < 140 °F.
 - b. Corrosivity - wastes that are acidic ($\text{pH} \leq 2.0$) or alkaline ($\text{pH} \geq 12.5$). Both may corrode or dissolve flesh, metal or other materials.
 - c. Reactivity - wastes that readily explode or undergo violent reactions such as sulfide or cyanide bearing wastes which react with acids or alkalines.
 - d. Toxicity - wastes that leach dangerous concentrations of toxic chemicals into groundwater. The Toxic Characteristic Leaching Procedure test is used to determine this characteristic.
- Waste with one or more of the four properties, it is a characteristic waste. It has a D waste code.
- 2.2.3. Listed: A waste is a listed waste if it comes from a "listed" operation. A listed waste may have an F, K, P or U waste code. For example: Spent solvent bath / flushing operation (F003)

2.3. Container Requirements

2.3.1. Waste in Container and Lid Closure

- Waste on the floor is to be inside a labeled container unless the containers are being serviced.
- Do not leave bags of waste next to the container.
- Under the Resource Conservation Recovery Act (RCRA), the EPA and PADEP require all hazardous waste containers to be closed at all times except when adding or removing waste. Keeping a lid open is unacceptable for hazardous waste.

2.3.2. Selection of Container

- Selecting proper waste containers for hazardous waste stream is critical. The container must be compatible with the waste.
- When selecting containers, make sure the container is in good condition. As waste is accumulated, inspect the container to ensure it is still in good condition. The container is to have no severe rust, sharp-edged creases or dents, leaks or residue anywhere on the exterior. If the container has any of these conditions it, must be either transferred to another container, cleaned, decontaminated, or over packed.
- If assistance is needed, contact a member of the Environmental, Health, and Safety (EHS) Department.

2.3.3. Filling Container

- Liquid waste containers must not be filled to the container rim or top to comply with DOT regulations.

- . In general, allow drums 4 to 6 inches of headspace and totes 6 to 8 inches of headspace for the temperature and pressure changes. Bulging containers also create a safety hazard for personnel expected to add or remove waste or handle the waste containers.
- . Solid waste containers are not to be filled to overflowing (i.e., filled above the container)
- . For heavy solids/sludges, additional headspace is required for the drums.
- . Do not fill roll offs above rim (top of container).
- . For additional help on container filling contact the EHS Department.

2.4. Labeling


2.4.1. Residual/Non-Hazardous Waste Labeling

All Residual/Non-Hazardous waste containers must be labeled with an approved and completed Residual Waste/Non-Hazardous Waste label immediately upon placing waste in the container. Each person who generates and places waste into a container is responsible to make sure the container is properly labeled, and all data sections completed.

The waste label must include:

- a. Generator (shipper) name and address (see 2.4.2)
- b. Contents - description of waste (see 2.4.3 and 2.4.4)
- c. If the waste contains liquid (water), then the pH, corrosivity index, must be measured and reported/listed in the contents section. Note: pH < 7.0 is an acid, pH > 7.0 is alkaline, and pH = 7 is neutral.

2.4.2. Residual/Non-Hazardous Label Information Example: Generator Information

	<p>Shipper: <u>Harley-Davidson Motor Company Operations, Inc.</u></p> <p>Address: <u>1425 Eden Road</u></p> <p>City, State, Zip: <u>York, PA 17402</u></p> <p>Contents (Waste Name): _____ (Must Complete)</p>
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2.4.3. Area Specific Residual /Non-Hazardous Wastes

- ✘ Aluminum Weld Dust and Filters
- ✘ Dampening material
- ✘ Dust Collection Filters
- ✘ E-coat
- ✘ Live Paint Sludge
- ✘ Mixed Paint Sludge
- ✘ Phosphate Washer Filters & Debris
- ✘ Powder Paint Waste (all colors)
- ✘ Powder Paint System Filters
- ✘ Sludge Pit Water
- ✘ Steel Weld Dust
- ✘ Weld Cell Filters

2.4.4. General Residual/Non-Hazardous Wastes

- ⌘ Aqueous (Water based) Parts Washer Solution
- ⌘ Brake Fluid / Synthetic Waste Oils
- ⌘ Cardboard
- ⌘ Construction and Demolition Waste (Contact EHS to confirm disposal requirements)
- ⌘ Fire Brick - Regenerative Thermal Oxidizer
- ⌘ Friable/Non-friable Asbestos
- ⌘ General Plant Trash or GPT - Green residual waste label or a "Trash" label may be used
- ⌘ Mop Sinks - mop water and floor scrubbing wastewater only, unless approved by EHS
- ⌘ Municipal Recycling - Plastic bottles #1, 2 or 5, Aluminum/Steel containers, Glass bottles,
- ⌘ Newspaper, Paperboard - Residual waste or a "Municipal Recycle" label may be used
- ⌘ Oily Debris (Pigs, socks, mats, etc.) including minor amount of metal fines/turnings
- ⌘ Parts washer solvent solution (used in Safety-Kleen type units except aqueous)
- ⌘ Scrap Metal (Aluminum, carbon or stainless steel, plated components, copper, brass, etc.)
 - a. Copper and brass items i.e., weld tips, gas caps, spot weld tips, copper tubes, brass hammers, etc. not coated will be collected in the area generated in various containers.
 - b. Copper and brass items i.e., insulated wires, shielded cabling, etc. that are coated will be collected, separate from coated items, in the area generated in various containers.
 - c. Small metal non - NCM components is collected in Assembly in small green bins.
 - d. Painted/E-coat metal must be segregated from bare metal (steel & aluminum)
- ⌘ Storm Sewer Cleaning Waste (liquids/soil/residues/oily debris)
- ⌘ Tires
- ⌘ Waste Oils/Coolants

2.4.5. Hazardous Waste Labeling

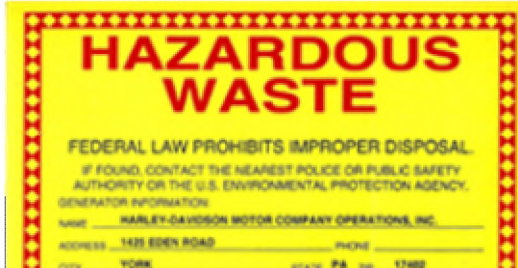
All Hazardous waste containers must be labeled with an approved and completed Hazardous Waste label immediately upon placing waste in the container. Each person who generates and places waste into a container is responsible to make sure the container is properly labeled, and all data sections completed.

The hazardous waste container must be tightly closed at all times, except when adding and removing waste.

The waste label must include:

- a. Generator name, address, phone number and EPA ID No.
- b. EPA/Waste No.
- c. Accumulation Start Date: This date is required when 55 gallons of a waste has been accumulated in either one container or a combination of several containers. All the containers must be dated at one satellite accumulation point when 55 gallons is reached / accumulated at the grouping. Waste must be picked up and moved to the 90-day storage area within 3 days once it has been dated.
- d. Use either the DOT Proper Shipping Description or in-house contents description (waste to be treated and/or handled/repackaged on-site). This is the label section below EPA ID No. and EPA Waste No.
- e. If there is liquid (water) then the pH must be reported/listed in the contents section. Special note: a pH value of 0.1 to 6.9 is an acid, and a pH value of 7.1 to 14.0 is a base or alkaline, and a pH value of 7 is neutral.

2.4.6. Hazardous Waste Label Information Example: Generator Information

	<p>Name: <u>Harley-Davidson Motor Company Operations, Inc.</u></p> <p>Address: <u>1425 Eden Road</u></p> <p>City: <u>York</u> State: <u>PA</u> Zip: <u>17402</u></p> <p>Phone No.: <u>717-848-1177</u></p> <p>EPA ID No.: <u>PAD 001643691</u></p>
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	<p>EPA Waste No.: e.g., <u>D001 D035 F003</u> (Must Complete)</p> <p>Date: _____ Must Be Added (See 2.4.5.c)</p> <p>DOT Proper Shipping Name or In-house Waste Name: e.g., <u>Paint Filters</u> (Must Complete)</p> <p>pH (If liquid): _____ (Must Complete)</p>
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2.4.7. Area Specific Hazardous Wastes - [In-house Waste Name / EPA Waste No(s)]

- ✘ Alcohol/ Isopropanol Alcohol Wipes / D001
- ✘ Gasoline Spill PPE and Debris / D001, D018
- ✘ Groundwater Treatment Systems spent carbon / D040, F001, D039
- ✘ Misc. Solvents / D001, F003, F005
- ✘ Mixed Acid Cleaners / Misc. Acids / D002
- ✘ Mixed Alkaline Cleaners / Misc. Alkaline Cleaners / D002
- ✘ Paint PPE, Filters and Debris / D001, F003, D035
- ✘ Phosphate Sludge (Filter Cake) and Filter Cloth / F019
- ✘ Waste Solvents (Reclaim and Non-Reclaim) / D001, D035, F003
- ✘ Wastewater Treatment Plant Sludge / F019

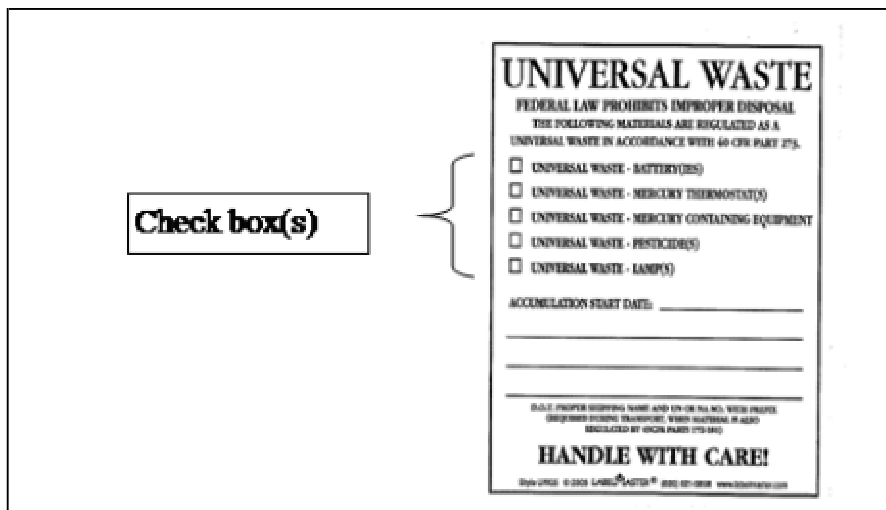
2.4.8. General Hazardous Wastes

Typical hazardous waste items consist of aerosol cans, alcohol bottles, loctite, lubricant containers, and touch-up paint are to be placed in 55-gallon metal yellow hazardous waste drums. Items placed in these hazardous waste containers may also include small plastic and metal containers / cans.

2.4.9. Universal Waste Labeling

All universal waste containers must be labeled with an approved and completed Universal Waste label immediately upon placing waste in the container. Each person who generates and places waste into a container is responsible to make sure the container is properly labeled.

- ✘ Universal wastes not managed and recycled properly, may be considered hazardous waste.
- ✘ To ensure Universal wastes are recycled properly, place a check mark or "X" in the appropriate box (s) indicating the container contents on the label.



2.4.10. Universal Wastes

- ✘ Wastes streams at H-D in this category are:
- ✘ Obsolete Electronic Equipment. See 3.1.

- ✗ Fluorescent Lamps 4' and 8'
- ✗ Bulbs, HID (High Intensity Discharge), odd sizes, u-shaped or circular fluorescent. See 3.2.
- ✗ Mixed batteries from manufacturing activities, motorcycle production, motorcycle carriers, etc. including dry cell and electronic batteries. See 3.3.

2.4.11. Medical Wastes, Labeling and Containers

- Medical waste typically includes materials contaminated with blood - bandages, wound cleaning solutions and sharps - needles, syringes, scalpel blades.
- Label typically is red background, contains hazard warning words: Regulated Medical Waste, Danger and Biohazard, and contains a biohazard symbol.
- Containers may be either a red biohazard disposable bags or metal /plastic wall unit with a secure drop lid opening. Sharps containers for medical waste are available in the restrooms and in the Lifestyle Center.



3. Special Handling Waste Streams

3.1. Collection and Packaging of Obsolete Electronic Equipment

Obsolete manufacturing electronic equipment is to be recycled and may include circuit boards, mixed components, capacitors, connectors, drives, keyboards, monitors, etc. The internal method for recycling is:

1. Departments segregate obsolete manufacturing electronic equipment.
2. Departments call the Waste Services contactor for collection at 717-852-6069.
3. WHs collect obsolete manufacturing electronic equipment.
4. WHs properly package the equipment, label the container/equipment with a universal waste label, and store in a satellite accumulation area.

3.2. Collection and Packaging of Fluorescent Lighting Fixtures

Disposal of lighting fixtures spent or obsolete, etc. are to be recycled and packaged by 4', 8' or Miscellaneous types. The packaging requirements are:

1. The 4' lamps and bulbs are packaged in 4' boxes.
2. The 8' lamps and bulbs are packaged in 8' boxes.
3. Miscellaneous bulbs are packaged together in 4' tubes. These may be high-intensity discharge (HID), mercury-vapor, metal halide, high-pressure sodium, neon, other types of used/spent HID bulbs, high pressure sodium, and fluorescent tubes that are circular, U-shape, or small lengths.
4. Tubes and Boxes for lamps are to be closed e.g., lid /top closed and flaps taped closed, respectively, except when adding lamps.
5. Special Note: Lamps are not to be crushed since that process makes them a Hazardous waste.
6. Call the Waste Services contactor for collection at 717-852-6069.

3.3. Dry Cell, Electronic and Lithium Batteries

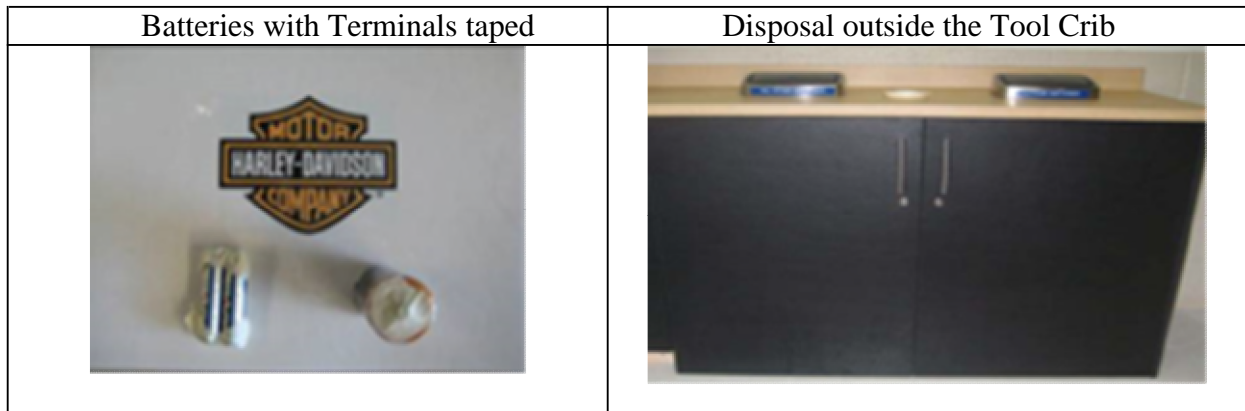
Take spent battery to the Tool Crib collection point. Perform these proper steps before placing batteries into the container.

Special Note: Lithium batteries MUST be separated from all other batteries. Do not mix.

1. All employees are to use tape dispenser provided and pull off a length of tape long enough to cover (+) and (-) terminals (separately or together) and apply.

2. Tool Crib Attendant will keep the tape filled / available for use. If the no tape is at the storage unit, notify the Tool Crib Attendant.
3. Place the compliant batteries into the appropriate collection container. Place Lithium batteries in the container labeled "Lithium Batteries Only." Place all alkaline and nickel cadmium batteries in container labeled "All Other Batteries".
4. WH will remove the full drum, transport it to HWSA, and replace with an empty properly labeled drum.
5. Alert your supervisor of any questions or battery condition issues or contact EHS Department.

For additional information see the YS2.03.637.VA1 Visual Aid for Used Battery Disposal posted at the disposal area.



3.4. Lead Acid Batteries

Lead acid batteries are to be disposed / recycled such as motorcycle batteries.

1. Contact the Waste Services Contractor at 717-852-6069 for collection by a WH.
2. WHs will transport the batteries to the designated storage area for recycling or disposal.
3. WHs will properly package the equipment, label the container/equipment with a universal waste label, and store the container/equipment in a satellite accumulation area.

3.5. Waste To Be Determined

Wastes not determined as non-hazardous/residual, hazardous or universal are to be labeled as a hazardous waste. The contents area of the label must include details listed in Section 2.4.5 Hazardous Waste Labeling and must contain the words "To Be Determined". This is to be followed for waste listed below, but not limited to:

- . Anion/Cation Resins
- . Lead Paint /
- . Non-Standard Contaminated Soils
- . Spill Clean-up / ERT - PPE and Associated items

3.6. Various Container Types and Product Disposals

3.6.1. Various Empty Containers

EPA defines empty as less than (<) 1 inch of material remaining (meaning not to be viewed as an allowable quantity) and is poured empty. DOT requires the drum be empty, sealed and containing original labeling identifying the emptied contents.

1. Department offering drum or tote of various sizes for disposal is responsible to empty the container by pouring out any remaining material. If necessary, prop up the drum using a drum wedge a few inches and lean / tilt it towards the removing mechanism (pump) to enable the contents to be removed.
2. Make sure contents are poured out, pumped out and drum or tote is empty. Tighten bungs on lids to ensure no other materials enter or are released from the drum or tote.
3. Follow the additional details below for specific container types.

3.6.2. Empty Fiberboard Drum w/ Metal

WH picks up and transports to compactor for disposal.

3.6.3. Empty Plastic Drums

1. Process area designates an employee to properly identify the container, may be various sizes, with "Empty" on the on top of container. "Empty" could be identified by legibly writing empty on the lid or by placing a label with the word "Empty" on the lid.
2. Process area designates an employee to attach a Safety Data Sheet (SDS) of the product that was in the container to the empty container before picking up and disposal.
3. If a process area has a designated location for the storage of wastes and/or empty containers, then the process area designates an employee to move the empty containers to that location for pick up and disposal.
4. Process areas without designated waste storage locations, contact Waste Services contractor at 717-852-6069 for pick up and disposal.
5. WH conducts routine checks of the designated storage locations and will remove empty containers for cleaning/reuse/recycling or disposal.
6. WH transports the empty containers to WWTP depending on where the empty container was generated. The exception is for containers that stored oil or solvent. WH manages drums for cleaning and reuse.
7. If the plastic container is an "open top" 55-gallon drum, the WH will store the empty containers for reuse as a collection container for oily waste debris or for other recycling items, etc.
8. If reused, the product label needs to be removed or blacked out and appropriate labeling applied.
9. WH may place plastic drums on drum trailer for offsite reconditioning/reuse.

3.6.4. Empty Metal Drums

1. For Empty Metal Containers repeat steps 1 to 6 of 3.6.3 Empty Plastic Container Disposal.
2. WH will remove metal containers for disposal.
 - a. Open-top metal containers may be reused.
 - b. Closed top metal containers will be taken to HWSA to be reused or placed on the drum trailer for offsite reconditioning/reuse

3.6.5. Expired/Obsolete Product

1. Before an expired/obsolete product can be removed for disposal, each process area must designate an employee to attach a SDS to the container of product.
2. Once the SDS is attached to the container, contact Waste Services contractor at 717-852-6069 for collection and disposal.
3. If a process area has a designated waste storage location, the process area will designate an employee to move the expired/obsolete product to the process area's storage location for pick up and disposal.
4. Multiple containers of same expired/obsolete product need only one /SDS attached to one item in the group.
5. WH will remove expired/obsolete product to HWSA for disposal.
6. An EHS member reviews the SDS to determine appropriate method for disposal of expired / obsolete product.
7. The expired/obsolete product will be processed and/or disposed properly.

3.7. Gas Filter

1. Gas filters are to be recycled.
2. Departments call Waste Services contractor at 717-852-6069. WH will collect the filters.

3.8. Powder Paint System Filters

1. Filters must be bagged then boxed.
2. A Residual/Non-hazardous Waste Label (section 2.4.2) must be on the box, stating "Black or Color Powder Paint Filter(s)".
3. Call Waste Services contractor at 717-852- 6069. WH will collect the filter.

3.9. Weld Cell Filters and Dust Collection Filters

1. Filters must be boxed.
2. A Residual/Non-hazardous Waste Label (section 2.4.2) must be on the box, stating "Filters for Scrap".
3. Call Waste Services contractor at 717-852-6069. WH will collect the filters. If waste will be produced during a non-production shift, please contact 717-852 6069 during production hours to arrange a staging area/time for pick-up.

Quality Records:

Record Description	Record Series ID Number
n/a	n/a

If there are associated records with this document, you can obtain retention information by following the link [Records Retention Schedule \(sharepoint.com\)](#) and referencing the appropriate schedule.

Robert Kennedy
Sharon Environmental
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Signed by