



# PARTS WASHING

## ENVIRONMENTAL GUIDELINES



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## **ACTIVITY DESCRIPTION**

The washing of machine parts to remove grease and oils using closed system equipment. DEN uses a closed system for parts washing that contains all the parts washing fluids, which is monitored and maintained by the DEN Fleet Department. If other systems are in use, compliance with regulations must still be met for maintenance and disposal of the fluid.

## **POTENTIAL ENVIRONMENTAL RISKS**

The following environmental concerns are associated with these activities:

- Improper handling of hazardous chemicals or materials
- Employee exposure to hazardous chemicals or materials.
- Spills of hazardous chemicals & materials
- Contamination of wastewater discharged to the municipal sewer system.

Potential consequences from performing the activity incorrectly:

- Property damage, personal injury or damage to the environment
- Regulatory non-compliance, Notices of Violation from Regulators, and related [financial & non-financial] penalties

## **RECOMMENDED OPERATING CONTROLS**

### Prohibited Activities

Removal or discharge of the fluids contained in the self-contained parts washing equipment is prohibited if maintained by a contractor; these fluids are routinely replaced by the contractor and should never be removed from the closed parts washing system for any reason.

### General Considerations

- Each operator and tenant conducting activities utilizing parts washing equipment and fluids is responsible for understanding the applicable regulations and managing their activities accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations. As noted, DEN facilities use a closed system in which the DEN Fleet Department monitors and maintains the fluid in the system.
- Wear proper personal protective equipment (PPE) when utilizing parts washing equipment, per OSHA regulations.
- The DEN Fleet Department is generally responsible for maintenance of the parts washing equipment and changing the parts washing fluid regularly for DEN's parts washers.

### Training Requirements

- Train all staff [on-the-job] on general awareness regarding the proper operation of parts washers and the appropriate PPE to use.
- Employee training programs shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact the sanitary sewer system. The Parts Washer training shall address topics such as spill response, good housekeeping, and material management practices. Contractor or



temporary personnel shall be informed of plant operation and design features in order to prevent discharges or spills from occurring.

## **PLANNING REQUIREMENTS**

Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur.

The DEN Fleet Department is responsible for maintaining parts washing equipment and replacing the parts washing fluid regularly. If an increased frequency is required to change the parts washing fluid, the supervisor at DEN Fleet Department must be contacted.

## **CRITICAL TASKS**

Maintain a fluid change-out log to document monitoring/maintenance and the replacement of parts or washing fluids.

Check with Environmental Services for any questions.

## **EMERGENCY RESPONSE**

- If a spill occurs, refer to Environmental Guideline Spill Response.
- Call DEN Communications Center immediately at 303-342-4200 for all spills.
- Control spills to minimize property damage and eliminate imminent risk to human health and the environment.
- Spills/releases should be contained and cleaned up as soon as possible using the appropriate method(s) and material(s) for the media spilled/released. Containerized wastes should be properly labeled, stored, and disposed.
- Spills of any kind shall not be washed into any sanitary sewer, storm sewer or waterway, or onto any soils.

## **INSPECTION AND MAINTENANCE REQUIREMENTS**

Inspect part washing areas regularly, paying attention to drum/container integrity. Plug any leaks and clean up spills immediately. Notify the contractor if equipment is damaged.

## **EXPECTED RECORDS AND OUTPUTS**

Certification of Reuse and Recycle (if option is used)

- Obtain a letter from the equipment service contractor certifying that they recover, reuse, and recycle the cleaning fluids. Otherwise the shipping weight of the contaminated fluids must be counted against the hazardous waste generation by the user/shipper if the fluids qualify as hazardous listed or characteristic wastes.



### Maintenance and fluid change-out log

- A log of parts washing equipment monitoring/maintenance activity should be maintained on site by the Owner, Tenant, or Operator contracting the equipment use.
- Receipts of contractor visits or DEN Fleet Department maintenance activities should also be maintained on site, documenting the removal and replacement of parts washing fluids.

### SDSs

- Manufacturers of products will supply these documents on demand. SDSs for all products in use should be made available to all employees engaged in handling and management activities and maintained on file by the Tenant, Operator, or Owner at the facility.

## REFERENCES

### Contacts

- DEN Communications Center (for spill reporting) 303-342-4200
- DEN Environmental Services (Main Line): 303-342-2730; [DIA.Environmental@flydenver.com](mailto:DIA.Environmental@flydenver.com)
- DEN Environmental Services Contact: Kim Ohlson 303-342-2637; [kim.ohlson@flydenver.com](mailto:kim.ohlson@flydenver.com)

### Guidance Materials

- SDS's

### Training Materials

- Spill Response
- General Waste Management

### Applicable Regulations

- 40 CFR 260 to 263 for hazardous waste generation and management
- 6 CCR 1007
- DEN rules and regulations