



Title	ES-301-2.09 Parts Washing
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1) Activity Description:

The washing of machine parts to remove grease and oils using closed system equipment provided by a contractor, which includes fluid replacement. DEN uses a closed system for parts washing which contains all the parts washing fluids. A contractor then collects the fluid for recycling. If other systems are in use, compliance with regulations must still be met.

2) Potential Environmental Risks

- A. The following environmental concerns are associated with these activities:
 - i) Improper or inappropriate handling of hazardous chemicals or materials
 - ii) Employee exposure to hazardous chemicals or materials.
 - iii) Spills of hazardous chemicals & materials
 - iv) Contamination of wastewater discharged to the municipal sewer system.
- B. Potential consequences from performing the activity incorrectly:
 - i) Property damage, personal injury or damage to the environment
 - ii) Regulatory non-compliance, Notices of Violation from Regulators, and related [financial & non-financial] penalties

3) Critical Operating Requirements

- A. Prohibited Activities
 - i) Removal or discharge of the fluids contained in the self-contained parts washing equipment is prohibited; these fluids are routinely replaced by the contractor and should never be removed from the closed parts washing system for any reason
- B. General Considerations
 - i) 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 contracted vendor warrants to process and reuse the contaminated solvent. This type of process is just one choice available to DEN tenants.
 - ii) Wear proper personal protective equipment (PPE) when utilizing parts washing equipment, per OSHA regulations.
 - iii) The contractor is generally responsible for maintenance of the parts washing equipment and changing the parts washing fluid regularly.
- C. Training Requirements
 - i) Train all staff [on-the-job] on general awareness regarding the proper operation of parts washers and the appropriate PPE to use.
 - ii) Employee training programs shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact stormwater runoff. Stormwater 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.

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4) Planning Requirements

- A. Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur.
- B. The contractor 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 contractor must be contacted.

5) Critical Tasks

- A. Maintain a receipt fluid change-out log to document contractor visits and the replacement of parts washing fluids.
- B. Check with Environmental Services for any questions.

6) Emergency Response

- A. Call DEN Communications Center immediately at 303-342-4200 for all spills regardless of whether any media was impacted.
 - See Environmental Guideline *ES-301-5.02: Spill Response*
- B. Control spills to minimize property damage and eliminate imminent risk to human health and the environment.
- C. 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.
- D. Spills of any kind shall not be washed into any sanitary sewer, storm sewer or waterway, or onto any soils.

7) Inspection and Maintenance Requirements

- A. 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.

8) Expected Records and Outputs

- A. Certification of Reuse and Recycle
 - i) 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.
- B. Maintenance and fluid change-out log

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- i) A log of parts washing equipment contractor visits should be maintained on site by the Owner, Tenant, or Operator contracting the equipment use.
- ii) Receipts of contractor visits should also be maintained on site, documenting the removal and replacement of parts washing fluids.

C. MSDSs

- i) Manufacturers of products will supply these documents on demand. MSDSs 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.

9) References

A. Phone Numbers

- i) DEN Communications Center (for spill reporting) (303) 342-4200
- ii) DEN Environmental Services (Main Line) (303) 342-2730

B. Guidance Materials (list is not limited to the following)

- i) MSDSs

C. Related Environmental Documents (list is not limited to the following)

- i) ES-301-5.02 Spill Response
- ii) ES-301-6.01 General Waste Management

D. Applicable Regulations (list is not limited to the following)

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