



*Providing environmental and energy information and solutions to
Nevada's businesses and communities*

Business Environmental Program Hazardous Waste Fact Sheet

Industrial Use of Lockwood Regional Landfill

“Pollution is nothing but the resources we are not harvesting. We allow them to disperse because we are ignorant of their value.” Buckminster Fuller

Businesses need to consider Lockwood landfill as their “last resource” for waste management. When was the last time you took a hard look at the waste your business generates? Anything that does not go out the door as product is as good as money lost. Many businesses can reduce the amount of waste by simple recycling or reuse. Some find ways to enhance their processes, which reduces waste. No matter how you look at it, waste is an expensive item.

Lockwood landfill is one of the nation’s premier municipal solid waste facilities. Built in a geological area that is well suited for this use, Lockwood was designed to hold municipal refuse not industrial wastes. This is in part due to the way it was engineered and the permit it operates under. Industrial wastes are considered those that are not typical of household or retail/office waste such as metal grindings, oil contaminated absorbent and soils, unused non-hazardous commercial products, and asbestos containing materials.

Disposal of Non-hazardous Industrial Waste

Business may use Lockwood landfill for disposal of non-hazardous industrial wastes provided they get written permission (permit) for the type of waste they intend to dispose. The Washoe County District Health Department (WCDHD) oversees the operation of Lockwood, and is the agency that issues permits for disposal of non-hazardous industrial wastes. Non-municipal or industrial wastes must first meet a few basic requirements:

Non liquid - Industrial waste must not contain any bulk or free liquids. Suspect wastes must be tested at any Nevada certified laboratory using EPA’s method 9095B “Paint Filter Liquids Test”. This test method uses a standard paint filter that the waste is placed into. If any portion of the material passes through and drops from the filter within the 5-minute test period, the material is deemed to contain free liquids and cannot be landfilled at Lockwood. Businesses are allowed to conduct the paint filter test at their location although records must be maintained for WCDHD review.

Non hazardous waste

All businesses are required to make a determination on their wastes for hazardous waste screening purposes. Any waste that exhibits a characteristic (Ignitable, Corrosive, Reactive, Toxic) or is listed in the Code of Federal Regulations (40 CFR 261), may not be disposed at Lockwood.

Industrial Waste Release Permit-intermittent and continuous

WCDHD requires any business wishing to dispose of an industrial waste to complete and submit a “Waste Release Permit Application”. The permit is intended for infrequently generated waste; once or maybe twice a year. The permit application documents how the waste was created, its physical characteristics (solid, powder, etc.), how it will be contained (barrel, bag, loose), and the quantity. Supporting documentation must include a MSDS for the materials comprising the waste, and any analysis WCDHD may require.

Businesses that will regularly generate the same waste year round will need to request an Annual Industrial Waste Permit. WCDHD will issue the annual industrial waste permit only after an audit of the facility or the site generating the waste has been performed. WCDHD will require quarterly analysis of the waste for a period of time determined by WCDHD to ensure the waste characteristics remain consistent. Annual facility or site inspections will be mandatory for all annual permits issued.

Fees

WCDHD assesses a fee of \$100 per waste release permit application submitted with analytical test results, and \$57 for waste release permit applications not requiring analysis.

The Annual Industrial Waste Permit fee is \$221. Additional fees may be subject to wastes coming from outside Washoe County (greater than 100 miles away) to cover the additional mileage incurred when performing site audits.

Testing

Several tests may be required by WCDHD to ensure the waste will not pose either a risk to landfill employees or the environment. These analyses include testing for free liquids, leachable metals (can contaminate any runoff from the landfill), and specific organics, which are prohibited from the landfill environment. Tests performed for the purposes of the waste release must be done by a Nevada certified laboratory. The Nevada Division of Environmental Protection maintains a database of laboratories that have been certified for specific testing methods. Please visit their website at: <http://ndep.nv.gov/bwqp/lab/labservice.htm>.

Specific Wastes

Contaminated soils/absorbent

Petroleum (TPH) contaminated soil that is generated outside of Nevada, imported from the California Tahoe Basin needs a permit from WCDHD before it can be landfilled at Lockwood. The following documentation must be submitted to obtain a permit for land disposal of petroleum contaminated soil at Lockwood Regional Landfill:

- Completed waste release application from Washoe County District Health Department;
- Soils Waste Profile Pre-acceptance form from Disposal Services, operator of [Lockwood Regional Landfill](#). Contact the landfill on, 342-0401 ext 206;
- A minimum sample tested for each of the constituents listed below for every 50 cubic yards to be landfilled:
- Toxicity Characteristic Leaching Procedure (TCLP) Analysis for purgeable and extractable Total Petroleum Hydrocarbons (TPH)
- TCLP Analysis for metals, EPA Method 1311
- TCLP Analysis for Volatile Organic Compounds (VOC'S), EPA Method 8260
- TCLP Analysis for Benzene, Toluene, Ethyl Benzene and Xylene (BTEX);
- Third party review, (TPR) or California Regulatory Agency letter stating soil is not considered hazardous in the state of California. The TPR may be completed by a Nevada Certified Environmental Manager. For a current list of Nevada Certified Environmental Managers, log onto <http://ndep.nv.gov/bca/certhome.htm>.

Requirements to obtain a waste release for TPH contaminated soils within Washoe County may be less restrictive than out of state requirements. Washoe County District Health Department may have regulatory authority and oversight of the release. Please contact James English (775) 328-6161 for more information.

Sand/Oil Separator Waste

Businesses that have wash racks or other applications that incorporate a sand/oil separator must have them cleaned out on a regular basis. The wastes from the clean-out must be accompanied by a permit if taken to the landfill. The following requirements must be performed and submitted with the permit application:

- Toxicity Characteristic Leachate Procedure (TCLP) 1311 for the following seven (7) metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, and Silver,
- TCLP Analysis for VOC'S, EPA Method 8260 for the following eleven (11) contaminants:
- Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroform, 1,4-Dichlorobenzene, 1,2- Dichloroethane, 1,1-Dichloroethylene, Methyl Ethyl Ketone, Tetrachloroethylene, Trichloroethylene, and Vinyl Chloride, (The above two tests are usually referred to as the "7/11" test);
- TCLP Analysis for purgeable and extractable Total Petroleum Hydrocarbons (TPH); and
- A pH test.

Drums and other containers

The occasional drum or container may be discarded to Lockwood landfill without prior approval provided it is dry/empty and deheaded or crushed. Buckets and other smaller containers are also allowed to be landfilled provided they are empty and dry.

Asbestos Containing Material

Asbestos containing material may be disposed at Lockwood Regional Landfill under permit provided it is appropriately contained in a suitable plastic wrapping and properly labeled.

Specifically Excluded Wastes

Although Washoe County issues permits for landfill use, Waste Management specifically prohibits the following wastes from being disposed to the landfill:

- Computer Monitors from commercial;
- Fluorescent Lamps;
- Fluorescent Lamp Ballasts;
- 55 Gallon Drums (whole);
- Motor Vehicles;
- Medical Waste

Please feel free to contact the Business Environmental Program on (800) 882-3233 or visit our website, www.unrbep.org for additional assistance.