

PEOPLE | PROPERTY | REPUTATION

RETAIL

ENVIRONMENTAL  
ROUNDTABLE



THE VOICE OF FOOD RETAIL 

## Conversation Starters

- **EPA increases focus on retailers**
- **Hazardous waste defined by category and type**
- **Pharmacy is not exempt**
- **The importance of audits**
- **Best practices for managing hazardous waste**
- **Program challenges and training requirements**

# EPA increases focus on Retailers

## Increased Focus on Grocer/Retailer Waste

US EPA and certain states have been scrutinizing retailers on hazardous waste management:

- **Mishandling returned/damaged products**
  - **Improper disposal** (dumpsters, drains)
  - **Improper storage**
  - **Improper shipping**
- 
- Regulatory activity has been increasing in CA, TN, VA, WV, AZ and other states

# Retailer Fines since 2010



= \$110 MM



= \$18.1 MM



TARGET®

= \$22.5 MM

CVS

= \$13.2 MM



= \$16 MM



= \$9 MM



= \$2.8 MM



= \$8.5 MM



= \$3.1 MM



= \$10 MM



= \$1.6 MM



= \$ 3.4 MM

# Hazardous waste defined by category and type

## What is Hazardous Waste?

- Dangerous or potentially harmful to health or environment
- Can be liquids, solids, or gases
- Can be commercial products; cleaning fluids or pesticides
- By-products of manufacturing processes





# Hazardous Waste Categories

- **Hazardous by Characteristic**
  - Ignitable – Measured by Flashpoint under 140F
  - Corrosive – Measured by pH <2 or >12.5
  - Toxic – Measured by Testing
  - Reactive – Not Measurable – Defined by EPA
- **Hazardous by Listing**
  - Commercial Chemicals – P and U Lists
  - Waste from Specific Processes – K List
- **Universal Waste** – Light bulbs, batteries, pesticides



# Hazardous Waste Generator Categories

**Large Quantity:** > 2,200 pounds per month or  
> 2.2 pounds per month of acutely hazardous waste

**Small Quantity (SQG):** Between 220 and 2,200 pounds per month

**Conditionally-exempt (CESQG):** < 220 pounds per month.

***\*In most cases, grocery stores fall into this category.***

# Types of Retail Hazardous Waste

## Ignitable/flammable



## Reactive



## Corrosive



## Toxic





## Universal Waste



- Fluorescent Lamps
  - Batteries
  - Mercury-containing devices
  - Pesticides
- Universal Wastes are subject to less stringent regulations when recycled

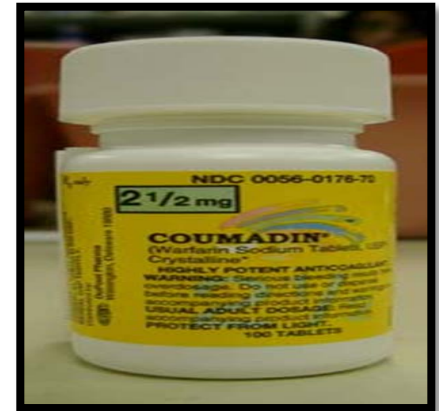
# Pharmacy is not exempt

## Pharmacy Hazardous Waste

- Expired / Unused pharmaceutical products
- Residual pharmaceuticals:
  - *IV bags, tubing, vials, medication, inhalers, aerosols, etc.*
- Broken and dropped pills

# Pharmacy Hazardous Waste

- Warfarin
- Coumadin



- Nicotine



- *These are considered acute hazardous wastes by EPA definition.*



## Pharmacy Hazardous Waste

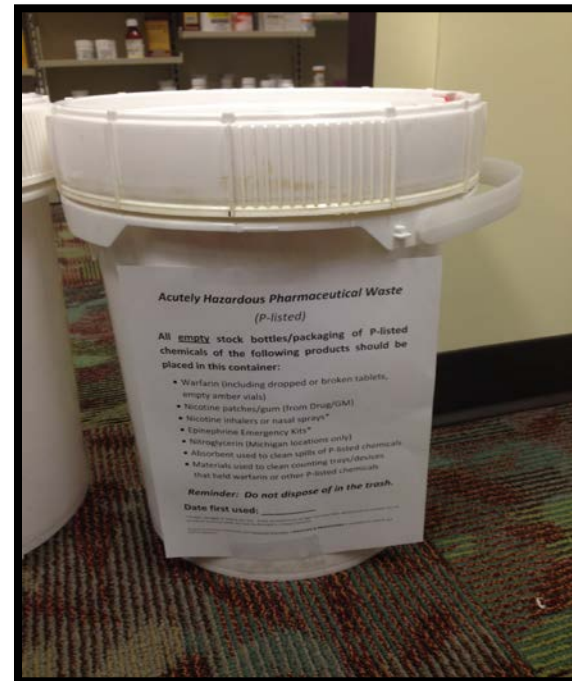
- Phentermine
- Epi Pens
- Inhalers (flammable aerosols)
- Chloral Hydrate





# Pharmacy Hazardous Waste Containment

5-gallon locking buckets for Rx hazardous waste



## Pharmacy Waste does not include:

- Blood
- Body tissue
- Body fluids
- Sharps

*\* These are medical / infectious wastes that require different disposal*

# The importance of Audits

**by: David Wright**  
**Big Y Foods**

# Best Practices for Managing Hazardous Waste

## Hazardous Waste Requirements

- **Keep it Simple!**
  - Have a written hazardous waste program
  - Create a designated hazardous waste area
  - Have a process for handling small spills



## Hazardous Waste Do's

- Assign process ownership to a member of store management
- Contain leaking products in separate bags
- Segregate Incompatible Wastes
  - Flammable, Aerosol, Acid, Base, Bleach, Toxic
- Store waste stream in closed & labeled containers
- Maintain Shipping Papers
  - Manifests or Bills of Lading
  - Disposal Vendor can assist greatly
- Train appropriate personnel



# Hazardous Waste Containment Area





## Signage

### HAZARDOUS MATERIALS KEY

These materials when damaged or spilled should be sorted into the following categories. Place items in the appropriately labeled totes until the product can be picked up by a licensed contractor. If you do not know what category a product belongs in, and the label does not help (check for signal words), call KCAC at 1-800-982-2749

Flammable/Combustible	Corrosive	Toxic/Poison	Reactive/Oxidizers	Pressurized/Aerosol
Acetone Epoxy/Adhesives Fuel Furniture Polish Hair Spray Lamp Oil Mineral Spirits Some Solvents Oil Based Paint Products Some Caulking	Chlorine Bleach Chlorine Bleach Cleaners Muriatic Acid Oven Cleaners Pool Chemicals Drain Cleaners Rust Remover Silver Polish Toilet Bowl Cleaners Concrete Cleaners	Antifreeze Brake Fluid Brass Polish Fertilizers Fungicides Rat Poison Garden Chemicals Insecticides	Any product containing Chlorine: • Bleach • auto dishwashing detergent • pool chemicals Can produce a toxic gas when mixed with products containing ammonia	Butane Propane Spray Paint Tire Inflators All Aerosols

Batteries (lead acid, ni-cad, silver) and bleach should be stored separately from other hazardous materials and from each other. Automotive batteries are picked up under another program and are stored separately from the hazmat containment area.

Signal words are: Poison, Danger, Warning, or Caution. They identify a product as hazardous.

DIAGRAM 1228

CALL KROGER CENTRAL ALARMS CONTROL AT 1-800-982-2749 TO ARRANGE PICK-UP OF HAZARDOUS MATERIALS

### Hazardous Materials Do Not Ship List

The products listed below *will not* be shipped by Store Associates.

- Denatured Alcohol • Acetone • Castrol Super Clean • Muriatic Acid
- Paint and Varnish Stripper • Matchboxes • Lighters • Propane
- Coleman Fuel (Propane and Liquid Gas) • Lithium Batteries
- Lacquer Thinner • Plumbing Chemicals • Deck Stripper
- Truck Bed Coating Paint • Butane (includes all lighters) • Insecticides
- Fire Extinguishers • Automotive Products • Spa and Pool Chemicals • Fireworks



Hazardous products identified as Limited Quantity in the handheld units may be shipped when boxed and marked with this Limited Quantity label. Always follow Division Reclaim Policy.



### STOP!

Before shipping any item, be sure you know if it is Hazardous.

Look for the Signal Words:

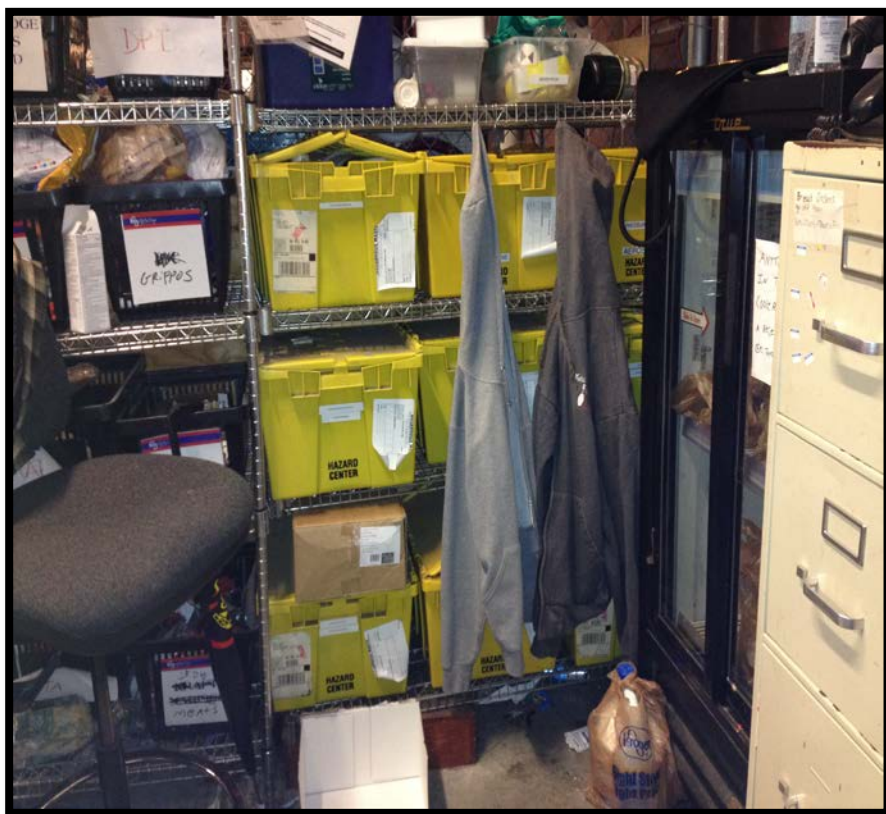
• Poison • Danger • Flammable • Warning •

Check the product to be shipped. If any of these signal words are on the package, label it as Limited Quantity before you ship it.

Never ship hazardous waste. Hazardous products and hazardous waste may never be disposed of with regular trash or poured down a drain. Licensed, approved contractors will remove hazardous waste on a regular basis. Waste disposal may be requested by contacting Kroger Central Alarm Control at 1-800-982-2749

# Hazardous Waste Containment Area

## What not to see!



## Recycle and Reclaim

**Materials are not hazardous wastes when they can be shown to be recycled:**

- Used or reused as ingredients in an industrial process to make a product
- Used or reused as effective substitutes for commercial products...”

**What to watch out for:**

- Must put into process “as-is” to make a new product
- Documentation of process



## Ingredient/Substitute Example

Nail  
Polish  
Returns/  
Damaged



Soap and Shampoo  
Returns/ Damaged



## Commercial Chemical Product

**Expired Nicotine  
Products**

**Recovered  
Nicotine**

**New Nicotine  
Products**



# Program challenges and training requirements

# Hazardous Waste Challenges

- No process
- Limited knowledge
- Too many products
- Too many waste streams
- Identifying products that are hazardous
  - The generator's duty is to determine if their wastes are hazardous (Based on testing or process knowledge)
- Understanding when a hazardous product becomes a hazardous waste
- Training employees to manage hazardous waste



## Employee Training

- Train Associates who have hazardous waste handling responsibilities:
  - Back Door Receivers
  - Store Managers
  - Asst. Managers
- Initial training upon hire
- Annual refresher training