



MAINTENANCE - PARTS WASHING

ENVIRONMENTAL GUIDELINES



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PURPOSE

The purpose of the guideline is to provide guidance on what DEN's expectations are for Parts Washing. This document outlines information to prevent improper handling of hazardous chemicals, reduce employee exposure to hazardous chemicals, reduce spills, and prevent discharges to the sanitary water system. This document is designed to promote an elevated compliance level associated with DEN's Sanitary Water Permit. 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.

ACTIVITY DEFINITION

This EG discusses washing 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.

EXPECTATIONS

Best Practices:

- 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.
- If an increased frequency is required to change the parts washing fluid, the supervisor at DEN Fleet Department must be contacted.
- Inspect part washing areas regularly, paying attention to drum/container integrity. Plug any leaks and clean up spills immediately.
- Train all staff [on-the-job] in general awareness regarding the proper operation of parts washers and the appropriate PPE to use.
- Retain the following documents:
 - 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.



- 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 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.
- Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur.
- 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 waste should be properly labeled, stored, and disposed of.
- If a spill occurs, call DEN Communications Center immediately at 303-342-4200.

Shall Not:

- 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.
- Spills of any kind shall not be washed into any sanitary sewer, storm sewer or waterway, or onto any soil.

REFERENCES

Contacts

- DEN Environmental Services (Main Line): 303-342-2730; DENEnvironmental@flydenver.com

Additional Resources

- 40 CFR 260 to 263 for hazardous waste generation and management
- 6 CCR 1007
- DEN rules and regulation 180