

Important Note: The following text is excerpted directly from the New York State Department of Environmental Conservation's publication, *Environmental Compliance, Pollution Prevention, and Self Assessment Guide for the Marina Industry*. New York State Department of Environmental Conservation Pollution Prevention Unit. March 2003. The only changes that have been made are the addition of links to pertinent resources or regulations and Editor's Notes, where appropriate.

alkaline cleaning compounds, refer to the parts cleaning and degreasing information (<http://www.seagrant.sunysb.edu/marinabmp/section1/degreasingcompliance.pdf>)

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Abrasive and Alkaline Cleaning Compounds

REGULATORY REQUIREMENTS

If your facility uses alkaline or acidic cleaning solutions, you must make a hazardous waste determination on the spent solution before disposing of it. If the pH of this waste is 2.0 or less; or 12.5 or greater, prior to any waste treatment, then these are hazardous wastes. In addition, these wastes could be hazardous if they fail the TCLP (Toxic Characteristic Leaching Procedure) test for metals.

BEST MANAGEMENT PRACTICES

Chemical substitution is one of the best ways to reduce your hazardous waste generation during your cleaning process. Another tip is to use mild alkaline and acidic cleaners. Mild alkaline detergent solutions, such as sodium hydroxide, sodium carbonate, sodium phosphate, and borax, are used to clean many substrates because no hydrogen gas is formed during the process. These cleaners also remove rust, scale, and oxides from metal surfaces. Generally, the stronger the solution, the faster it cleans. However, mild solutions are used in the process line for thorough rinsing.

For more information on abrasive and