



ISP Materials Collection Site Standards

Effective: June 30, 2015

To the extent that there is any conflict between these Product Care Association ISP Materials Collection Site Standards and the requirements of applicable laws and regulations, the requirements of applicable laws and regulations apply. The collection site operator is required to comply with the requirements of the applicable laws and regulations. For greater certainty, in the event that the Product Care Association standards impose requirements that are more stringent or additional to the requirements of applicable laws and regulations but do not conflict with such laws and regulations, the collection site operator is required to comply with the PCA standards as well as with applicable laws and regulations

Background:

PCA operates the Industry Stewardship Plan ("ISP") to ensure certain hazardous and special wastes are collected and recycled or otherwise safely disposed of in an environmentally appropriate way.

Product Care Association was authorized by Waste Diversion Ontario to plan, implement and operate the ISP for paints and coatings, and the containers in which they are contained as defined in the ISP.

The ISP, rules and material definition can all be viewed on the PCA website at <http://www.regeneration.ca//service-partner-support/ontario/>

Purpose:

The ISP Collection Site Standards define the minimum operating requirements to qualify as a Product Care Association collection site for ISP Materials. All locations wishing to act as a collection site on behalf of PCA must be approved by PCA.

The ISP Collection Site Standards do not absolve collection sites from any federal, provincial and/or municipal legislation and regulations applicable to their operation. It is the collection site's responsibility to be aware of, and abide by, all such legislation and regulations.

PCA reserves the right to review and revise these standards on an ongoing basis. The most current version will be posted on the PCA website. PCA will, as a courtesy, provide notification of changes to active collection sites for which it has current email addresses; however, it is the collection site's responsibility to regularly check the PCA website for revisions.

Who this applies to:

For the purposes of these standards, a *Collection Site Operator* means the operator of a

location at which ISP Materials are received from the public and/or a small quantity or IC&I generator, or via the site's internal operations from which a transporter will pick up ISP Materials and transport it to an approved ISP Materials processor. These standards apply to the following two types of collection sites:

1. **Type 1 sites:** Sites that receive a wide range of MHSW, and
 - **Type 2 sites:** Sites that collect only: Paints and coatings;

Enforcement of these Standards:

Collection site operators shall:

- Provide PCA with all reasonable information relating to these standards or any matter that relates to the ISP or procedures of PCA;
- Acknowledge that PCA has a right of access to any and all such information during normal business hours and on 24 hours' notice.

Moreover, PCA may verify compliance information provided by collection site operators, either directly or through a third party acting on its behalf. Please note that all parties acting on behalf of PCA are bound by strict confidentiality agreements.

1. General Requirements

All ISP Materials collection site operators shall:

- 1.1 Possess a valid business licence if they are a commercial operation.
- 1.2 Either self-insure, or possess comprehensive or commercial general liability insurance, including coverage for bodily injury, property damage, complete operations and contractual liability.
- 1.3 Identify and comply with all applicable legislation and approvals, including but not limited to:

Type 1 collection sites shall be:

- In possession of and in compliance with all terms in their MOECC Environmental Compliance Approval (ECA);
- Registered with the MOECC's Hazardous Waste Information Network (HWIN);
- In compliance with the Ontario *Environmental Protection Act, 1990* (including R.R.O. 1990, O. Reg. 347, General – Waste Management);
- In compliance with the federal *Transportation of Dangerous Goods Act* (TDGA);
- In compliance with applicable municipal zoning bylaws or other bylaws, such as fire codes, parking and hours of operation.
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Type 2 collection sites shall be:

- In compliance with the Ontario *Environmental Protection Act, 1990* (including R.R.O. 1990, O. Reg. 347, General – Waste Management);
- In compliance with the federal *Transportation of Dangerous Goods Act* ;

- In compliance with applicable municipal zoning bylaws or other bylaws, such as fire codes, parking and hours of operation.
- 1.4 Maintain a documented process to identify, assess and ensure compliance with this standard and all applicable legislative and regulatory requirements, including but not limited to:
 - Environmental regulations, including permits or certifications for operating, air emissions, or other discharges;
 - Occupational health and safety regulations;
 - Hazardous waste management regulations (storage, handling).
 - 1.5 Implement and maintain an emergency response plan to prepare for and respond to emergency situations including fires, spills and medical events.
 - 1.6 Maintain all records for a minimum of two years or longer as required by law, including manifests, bills of lading and waste records.
 - 1.7 Provide notice to PCA of any fines or regulatory orders in the previous five years and, going forward, within 60 days of any new fine or regulatory order as it relates to the ISP.

2. Occupational Health and Safety
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All collection site operators shall:

- 2.1 Identify and comply with all applicable health and safety legislation, including but not limited to:
 - *Employment Standards Act, 2000;*
 - *Occupational Health and Safety Act, 1990;*
 - *Workplace Safety and Insurance Act, 1997;*
 - *Canada Labour Code.*
- 2.2 Possess workers' compensation coverage through either a provincial (WSIB) program or a private insurance policy.
- 2.3 Be compliant with the Workplace Hazardous Materials Information System (WHMIS), including training requirements.
- 2.4 Maintain an occupational health program that includes processes to safeguard the health and safety of employees by:
 - Providing regular documented health and safety training;
 - Providing and enforcing the correct use of personal protection equipment; and
 - Safeguarding hazardous mechanical processes.

3. Staff Training

All collection site operators shall:

- 3.1 Train staff on their emergency response plan.
- 3.2 Train staff to identify and pack ISP Materials in its appropriate waste class according to Waste Packing Protocols (refer to Appendix A).
- 3.3 Train staff to differentiate between ISP Materials that is eligible for collection services under the ISP and those that are not (refer to Appendix A).
- 3.4 Update staff training based on any changes made to the Collection Site Standards.
- 3.5 Document and maintain records of staff training.

4. Waste Packing Protocols

All collection site operators shall:

- 4.1 Pack waste according to the MOECC's waste classes and PCA Waste Packing Standards as outlined in Appendix A.
- 4.2 Ensure that ISP Materials are handled and stored as follows:

For Type 1 collection sites:

In accordance with the conditions laid out in their respective Environmental Compliance Approval and all applicable laws and regulations.

For Type 2 collection sites:

- Have the ability to receive wastes from the public in a controlled manner (direct supervision or monitored) in a customer drop-off area;
 - Have adequate infrastructure to shelter material from inclement weather in a consolidation storage area;
 - Have sufficient space to receive, sort, store and prepare transportation containers for shipment:
 - Paints and coatings: minimum of eight (8) 205 L drums/two standard UN gaylord boxes or one week of paints and coatings received at each collection site;
 - As applicable, have material-handling equipment with the ability to move containers onto transport vehicles;
 - Be accessible to transport vehicles for pick-up of ISP Materials ; and
 - Have adequate security measures in place to prevent ISP Materials from being tampered with by anyone at the site or using the collection facility at unauthorized times.
- 4.3 All waste must be packed in an approved UN container¹ and all materials transported must be contained in accordance with TDGA requirements.
 - 4.4 Transportation containers must be filled to capacity, except if this practice contravenes either a ministry order or the Collection Site Operator's Environmental Compliance Approval Storage Requirements. Transportation containers used at

event days should be filled to capacity and it is understood the last container filled of the day may not be filled, it may be partially filled.

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- 4.5 If applicable, make use of vermiculite in sufficient quantity to cover and protect the waste material from breakage when there is a potential for spillage or breakage of containers in a lab pack during transport:
- 4.6 Place large pails (25 litres or more) on skids and shrink wrap to prevent shifting of waste during transport. Alternatively, gaylord boxes may be used placing 25L pails on the bottom layer.
- 4.7 Contamination allowances
 - The maximum contamination allowance is 5%. This is a weight-based allowance assessed on individual drums for a given waste class.
 - Contamination levels in transport containers (mis-packed ISP Materials, non-program wastes as identified in Appendix A) will be monitored by PCA or by its authorized agent through random sampling. ISP Materials collection site operators will be required to take corrective action if contamination allowances are exceeded. PCA reserves the right to apply a financial penalty to collection site operators who exceed the contamination allowance or revoke the collection site's approval status if corrective action is not taken as requested by PCA.

¹ Refers to containers that meet the requirements established by the United Nations Committee of Experts on the Transportation of Dangerous Goods; these requirements provide a uniform international system for identifying and packaging Class 3, 4, 5, 6.1, 8 and 9 dangerous goods for transport.