



Frequently Asked Questions about Recycling Credits

from Ecology's Hazardous Waste and Toxics Reduction Program

Q: What are recycling credits?

A: The amount of waste you annually report determines if you are subject to pollution-prevention planning requirements and fees. Recycling credits apply as a discount to that waste amount. For example, if you report manifesting 100 pounds of solvent with a 95 percent recycling credit, 95 pounds are "discounted" and only five pounds count towards planning and fees.

Q: Do they affect my generator status?

A: No, they only reduce the amount of waste counted to determine your pollution-prevention planning status and to calculate the associated fee. A monthly tally of generated and/or accumulated wastes determines your generator status. Planning status is determined by the annual aggregate total of recurrent waste generation.

Q: Is there credit for on-site recycling?

A: No, the credit only applies to waste manifested to a treatment, storage, disposal and recycling facility (TSDR) for reclamation. Waste that is recycled on-site is automatically discounted for planning and fee purposes. It is not necessary to claim credits for waste recycled on-site.

Q: How do I know if I am entitled to a credit, and how do I get it?

A: You must contact your TSDR to find out which of your waste streams went through a recycling process and how much was actually reclaimed; then request written documentation. Many TSDRs routinely furnish this information in an annual recap report to their individual customers. You may also receive a separate notification of any entitled credits. Save this documentation since you may be asked for a copy by Ecology staff to verify recycling-credit claims.

Q: Do all TSDR facilities give the same credits?

A: No, you will need to check with each TSDR that you've used during the year to find out the reporting year's recycling credit. Not all waste streams are eligible for credits and not all TSDRs choose to use reclamation processes.

Q: Can recycling credits change from one year to the next?

A: Yes, they can vary from one year to the next even for exactly the same waste stream. Credit is based on the portion of a stream that is reclaimed for immediate reuse for the same or like product. Using solvent as an example, if your TSDR has a guaranteed market, the credit will be fairly stable. If the demand for recovered solvent falls, the credit amount may similarly fall.

Q: Why won't Ecology accept 100 percent credit?

A: Reclamation and recycling processes recover only a part of incoming waste streams. Consequently, those portions of waste streams that are ultimately disposed of are not eligible for credit. Credit is based on the amount of product that is recovered; not on the amount of waste being sent for recycling.

Q: Do I need special forms?

A: No, each TSDR can supply you with written documentation in any format they choose. You report your credits on the Dangerous Waste Annual Report.

Q: Where do credits go on the Annual Report?

A: On the Generation and Management (GM) Form in Section B-4, i.v. You can find more information in Chapter 5: Special Reporting Situations in the Dangerous Waste Annual Report, 2003 Forms, Instructions and Guidance, Ecology publication #03-04-018. This publication is available from Ecology by calling (800) 874-2022 (toll-free within Washington), or (360) 407-6170 to ask for a copy by mail. It is also available on the Internet at <http://www.ecy.wa.gov/biblio/0304018.html>

Q: Is documentation required?

A: Yes, you are required to save all documentation of the credits you are claiming for that calendar year to the Dangerous Waste Annual Report. Keep them in the hazardous-waste files at your site.

Q: What if I can't get documentation in time to meet the March 1 reporting deadline?

A: If you have trouble obtaining the required documentation from your TSDR, notify Ecology at (800) 874-2022 (toll-free within Washington) or (360) 407-6170. Ecology employees will contact the TSDR on your behalf. (Remember, the TSDRs are busy preparing their Annual Reports at this time, so the earlier you request the information, the sooner you will get it.)

Q: What if I discover I am entitled to recycling credits after I've submitted my Annual Report?

A: Contact Ecology at (800) 874-2022 (toll-free within Washington) or (360) 407-6170. We will assist you in amending your report to include the recycling credit due to your facility. We will accept recycling credit amendments through Dec. 31 of the year the report is due.

If you require this publication in an alternate format, please contact the Hazardous Waste and Toxics Reduction Program at (360) 407-6700 or call 711 or (800) 833-6388 TTY (for the speech or hearing impaired).