



ShopTalk

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A PUBLICATION FOR DANGEROUS WASTE MANAGERS

Getting out of the toxics business

When a generator stops producing hazardous waste, they are said to be "out of the loop." They have moved out of the realm of hazardous waste regulation.

"Getting out of the loop, that's the ideal. Everyone benefits from that," said Greg Sorlie. Sorlie, former manager of Ecology's Hazardous Waste and Toxics Reduction Program, took a moment while preparing for retirement to discuss the toxics situation in Washington and what he sees for the future.

"We've done a good job over the last several years in helping businesses reduce waste," Sorlie continued. "[But] it's hard to show what you've prevented."

Sorlie's career covered 30-plus years with the Department of Ecology. In the last few years, he assisted the Director with the Reducing Toxic Threats initiative.

He sees the greatest challenges as population growth and "people that don't do the right thing."

Getting toxics out of the environment is important, Sorlie said, because we know contaminants such as mercury and flame-retardants are getting into our bodies of water. "They're now starting to get into us."

For example, a recent study by the non-government Toxic-Free Legacy Coalition analyzed hair, blood and urine samples from 10 Washington residents. Each person had at least 26 and as many as 39 toxic chemicals in their body, including mercury, perfluorinated compounds, phthalates, and PCBs.

"We are spending hundreds of millions of dollars each year on cleaning up toxic sites, and that's just Ecology's share," Sorlie said. "There are tens of millions spent each year on managing the toxic waste being traded." It amazes him that we spend so much effort and money on cleaning up, but don't focus on prevention.

The Reducing Toxic Threats initiative Sorlie worked on includes a focus on helping businesses reduce their production of toxic substances. Ecology proposes to work with business and consumers to better prevent pollution by:

- ✓ Providing technical assistance to help businesses find ways to reduce the amount of toxic substances used in products that get into our homes, offices, and bodies.
- ✓ Creating incentives to reduce waste, such as financial or regulatory incentives that encourage using fewer toxic substances. This includes incentives to design and produce "cleaner" products that result in less waste and less need for regulatory control.

- ✓ Buying "greener" products. Ecology is working with the Department of General Administration to encourage a shift to less toxic materials in state purchasing and contracting.
- ✓ Managing electronic waste better, by working with business to devise a system to collect, recycle, and reuse computers, monitors, televisions, and other electronic products. The 2006 Legislature passed a law providing for electronics recycling through manufacturer-financed opportunities, which Ecology is developing rules to implement.



Greg Sorlie's 30+ years with Ecology has convinced him the best path for dangerous waste generators is to "get out of the loop" of generation and regulation. Ecology's "Reducing Toxic Threats" initiative will help.

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What's a general inspection?

According to the *Dangerous Waste Regulations*, regulated generators must do a general facility inspection above and beyond the weekly storage area inspection (WAC 173-303-320). If you're thinking, "I've never heard of that," you're not alone! Many generators aren't aware of this requirement, but it is there and it's not hard to comply.

What do you need to do to perform an adequate general inspection?

✓ Think about your facility.

What do you have that qualifies as "monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that help prevent, detect, or respond to hazards to the public health or the environment"?

✓ Make a written schedule.

How often do you need to inspect that equipment to make sure it's all in good working order? Write up a schedule showing what items need to be inspected, when that should happen, and what the inspectors should look for.

✓ Perform and record the inspections.

Keep records showing that you've met your schedule. The records should include the printed and signed name of the inspector, the date and time of inspection, a description of any problems found, and a description of how you fixed the problems. Include any spills. Keep these records for at least five years.

That's it! Many facilities fold the general inspection requirement into their safety program. However you choose to do it, a good general inspection program will both increase safety at your facility and reduce the potential for environmental damage.

New manifest system: are you ready? End of Washington's Lab Pack codes

Starting September 5, a new Uniform Hazardous Waste manifest form must be used for shipments of waste from "cradle to grave." The Environmental Protection Agency (EPA) standardized the manifest to save time and money for waste handlers. Every waste handler in the U.S. will now use the same manifest form. State-only requirements were removed from the new manifest form.

Washington state Lab Pack codes (WL01 and WL02) relate to how a waste is handled. They cannot be used in the shipping description or as a waste code on the new manifest. Ecology will revise the *Dangerous Waste Regulations* to remove the state lab pack codes.

The new manifest uses check-boxes to help track difficult shipments, such as container residues, rejected wastes, and import/export shipments across international boundaries.

The new manifest:

- ✓ Requires federal and state waste codes (up to six) for each waste stream.
- ✓ Does not allow use of Washington State Lab Pack codes (WL01 and WL02).
- ✓ Limits special handling instructions to site-specific and shipment-specific information.
- ✓ Adds "point of generation" address to generator information.
- ✓ Allows an "offeror" who performs pre-transport functions, such as labeling, marking, packaging, and waste description, to sign the manifest.
- ✓ Requires the receiving facility to complete waste management codes for the type of treatment, disposal, and recycling to show how the waste was handled.
- ✓ Requires manifest forms to be printed by persons or companies registered with the EPA.

A list of manifest printers is available on the EPA Web site at: <http://www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/index.htm>

Questions about filling out the new manifest form? Contact Bryan Groce, Office of Solid Waste, (703) 308-8750, groce.bryan@epa.gov, or Richard LaShier, Office of Solid Waste, (703) 308-8796, lashier.rich@epa.gov.

Want to become a registered printer? Contact Wanda LeBleu at EPA (703) 308-0439, lebleu.wanda@epa.gov.

Questions about the change in Washington State Lab Pack codes? Contact Tom Cusack at the Department of Ecology (360) 407-6755, tcus461@ecy.wa.gov.

Ecology also has a Web page with more information: http://www.ecy.wa.gov/programs/hwtr/hw_manifests/index.html

EPA offers industry-specific help

Environmental regulations can be confusing. It's often hard to find out exactly what you need to do, in language that relates directly to the operations of your business. The Environmental Protection Agency's (EPA) Compliance Assistance Centers provide information and resources tailored to certain industry sectors.

The centers provide assistance to businesses in the agriculture, auto repair, auto recycling, construction, chemical, federal facility, local government, health care, metal finishing, paints and coatings, printed wiring boards, printing, and transportation sectors.

There is a center dedicated to compliance issues across national borders and another center that shows resources within a state. Visit the Compliance Assistance Centers at: www.assistancecenters.net/

The centers provide easy access to information and technical assistance on technologies that help prevent waste and improve environmental performance, and best management practices that reduce pollution while saving money.

Internet sales still a source of mercury

It is still possible to buy products containing mercury online, but you should know those products are illegal to sell in Washington state. In January 2006, the state Legislature banned sales of thermometers, blood-pressure gauges, and novelty items such as toys and jewelry containing mercury.

Ecology recently researched the largest online retailers and found products containing mercury for sale on Amazon.com and eBay. Amazon responded immediately when notified of the problem and prohibited the use of its Web site to sell products containing mercury. eBay, however, has not removed these products.

"Until they do, it's 'let the buyer beware' when it comes to online sales," said Miles Kuntz, Ecology's coordinator for the mercury-products ban. "If an online auction company won't voluntarily pull toxic products from its sales, Washington residents will need to watch out for themselves. They may be buying something that could contaminate their homes and endanger their families' health."

The Legislature enacted the ban of sales of mercury-containing products within Washington to protect residents from the toxic effects of mercury. The U.S. Postal Service also prohibits transporting mercury or mercury-containing products through the mail.

Some mercury-containing products are not part of the ban. They include thermostats (only if the manufacturer is participating in a recycling program), fluorescent bulbs, and batteries. Since 2004, fluorescent bulbs must be clearly labeled as containing mercury.

For more information, contact Miles Kuntz at (360) 407-6748, e-mail: miku461@ecy.wa.gov. Or visit Ecology's Mercury Web site at: www.ecy.wa.gov/mercury/index.html

Ecology: Champion for Change

The Department of Ecology earned a "Champion for Change" award from Hospitals for a Healthy Environment (H2E) for taking the lead to promote healthy hospitals throughout Washington.

Ecology won the award for helping hospitals work toward eliminating mercury, reducing waste, and minimizing the use of toxic products. In 2005, Ecology employees provided technical assistance to 25 out of 119 Washington hospitals. Ecology also created a guide to *Best Management Practices for Hospital Wastes* to help hospitals reduce wastes and toxins.

"I am proud that we've been recognized nationally for the valuable technical assistance we offer to hospitals," said Darin Rice, manager of Ecology's hazardous-waste program. "Reducing mercury in Washington is a priority for us and with strong partners like the Washington State Hospitals Association and H2E, we're on our way to success."

Ecology and the Washington State Hospital Association (WSHA) signed a memorandum of understanding for guiding projects to eliminate mercury and other wastes. The agreement is in effect through June 2007. It is Ecology's and WSHA's goal to safely remove mercury from hospitals and keep it out of the environment.

H2E is a national voluntary organization that aims to help healthcare facilities improve safety, reduce waste and waste-disposal costs, and become better environmental stewards.



European Rules for Chemicals workshop

Does your company export to the European Union? Do you manage supply chains that include chemicals? Do you compete globally with products meeting European standards?

If so, you should attend the *Complying with New European Chemical Regulations* workshop on September 15. The workshop will cover the proposed overhaul of the European chemicals management system, Registration, Evaluation, and Authorization of Chemical (REACH). The European Union may adopt the new rules in 2007.

The REACH system will put more responsibility on companies to collect data on most chemicals on the market, assess the risk, and define safe use. It will also require companies to justify continued use of chemicals of very high concern.

The workshop will explain the key features of REACH; a Pacific Northwest business panel on REACH impacts; tools for more sustainable chemicals management, product design and green chemistry.

The workshop will be at the Doubletree Hotel Seattle Airport, 18470 International Boulevard, Seattle, WA 98188. It runs from 8:30 a.m. to 4:30 p.m. on Friday, September 15. The \$85 registration fee includes a database of tools and resources, continental breakfast, lunch, and refreshments.

To register online go to: <http://www.chemicalspolicy.org/Registration.shtml>.

For more information, contact Maria Peeler, Department of Ecology, (360) 407-6704, peel461@ecy.wa.gov, or Andrew Crowder, Department of Community, Trade and Economic Development, (206) 256-6140 andrewc@cted.wa.gov.

The workshop is sponsored by the departments of Ecology and Community, Trade and Economic Development, and the Lowell (Massachusetts) Center for Sustainable Production.

2007 Workshops Scheduled

Registration opens November 1 for the 2007 series of Dangerous Waste Management Workshops. The workshop schedule is:

January 30	Vancouver
February 1 & 2	Shoreline
February 13	Spokane
February 15	Yakima
February 21, 22, & 23	Tacoma

The workshops cover the basics of identifying waste, proper coding for safe handling, proper storage and containers, and pollution prevention to reduce the amount of waste created.

Starting November 1, you may register by calling the Hazardous Waste and Toxics Reduction office at (360) 407-6700. Online registration will be available through the Hazardous Waste and Toxics Reduction Web page at: www.ecy.wa.gov/programs/hwtr/index.html

Department of Ecology

Your business is liable for all dangerous wastes generated. If you are uncertain about your responsibilities as a dangerous waste generator, call your nearest Ecology office and ask for a hazardous waste specialist. For information on reducing or recycling dangerous waste, ask for the toxics reduction staff, at:

Bellevue: (425) 649-7000

Lacey: (360) 407-6300

Yakima: (509) 575-2490

Spokane: (509) 329-3400

If you need this information in an alternate format, please call the Hazardous Waste and Toxics Reduction Program at (360) 407-6700. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call (877) 833-6341.

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