



Shoptalk

A publication for dangerous waste managers

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What's your generator status?

As we approach the Dangerous Waste Annual Reporting season, it seems like a good time for a generator status refresher.

Generator status is based on three things:

1. How much dangerous waste you generate per month.
2. The types of dangerous waste you generate.
3. How much dangerous waste you have on site (your accumulation).

According to these facts, in Washington you may be classified as a Small Quantity Generator, a Medium Quantity Generator, or a Large Quantity Generator.

A waste is considered a dangerous waste if it can burn, explode, corrode, or poison living things. Dangerous wastes are those solid wastes that designate as dangerous waste or extremely hazardous waste under the *Dangerous Waste Regulations* (WAC 173-303-070 through WAC 173-303-100). The term "dangerous wastes" includes federal hazardous wastes and wastes regulated only by Washington State.

Some dangerous wastes are so toxic or reactive that they are classified as "acutely hazardous waste." In addition, Washington State has specific designation,

Amount of Waste Generated Per Month

Generator Status	Dangerous Waste	Acutely Hazardous Waste	WT01 Waste
Large	2,200 pounds or more	2.2 pounds or more	2.2 pounds or more
Medium	less than 2,200 pounds more than 220 pounds	no medium status for this waste	no medium status for this waste
Small	less than 220 pounds	less than 2.2 pounds	less than 2.2 pounds

"WT01," for wastes that are highly toxic to living things.

Sometimes generators are actually in a higher status than they realize. They may be careful about counting what they generate, but they don't realize the total amount they have **accumulated** on site. Water weighs 8.34 pounds per gallon, so 2.2 pounds is about equal to one quart. 2,200 pounds is about equal to four and one-half, full 55-gallon containers.

If you accumulate more than 2.2 pounds of Acutely Hazardous Waste or WT01-designated waste, or 2,200 pounds of dangerous waste, then you qualify for the Large Quantity Generator status. You must meet all the requirements that apply to Large Quantity Generators, including proper annual reporting.

If you exceed accumulation thresholds at any time in 2008, you must report at the higher status.

Keep a close eye on your accumulated amounts to avoid more reporting and more regulations. Contact a Toxics Reduction Specialist at your local Ecology regional office for help in reducing your use of toxic materials and waste generation. See page 4 for phone numbers.

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Visit Shoptalk Online

www.ecy.wa.gov/programs/hwtr/shoptalkonline/index.html

2008 Tier Two Reports Due March 1

If your business stored hazardous chemicals during 2008, you must complete a Tier Two – Emergency and Hazardous Chemical Inventory report by **March 1, 2009**. You report the types and amounts of chemicals to the State Emergency Response Commission and to your local governments.

Tier Two is part of the requirements under Section 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA) or SARA Title III.

The reporting requirements apply to the maximum amount of a chemical on site *at any one time* during the previous calendar year. Different hazardous substances have different thresholds for reporting. For example, gasoline and diesel are reportable if 10,000 pounds or more are on site at any one time. Extremely Hazardous Substances, such as ammonia and chlorine, are reportable at much lower thresholds – ammonia at 500 and chlorine at 100 pounds.

This is a self-reporting program, which means that it is your responsibility to report without being prompted. Our office strives to assist reporters meet these requirements by providing technical assistance.

For more information, reporting requirements, forms, software, and contact information visit the EPCRA home page at www.ecy.wa.gov/epcra, or contact us by e-mail at epcra@ecy.wa.gov, or call **1.800.633.7585** (press 2 at the greeting).

For EPCRA training contact your Local Emergency Planning Committee. Find contact information on our Web site.

Source Control Specialists Find Heavy Metals in Dental Waste

Each year, dentists help keep as much as 300 pounds of mercury and large amounts of silver out of the environment. As many as 80 percent of the state's dentists use amalgam separators and properly dispose of spent x-ray fixer. But if 80 percent are doing the right thing, where does that leave the other 20 percent?

Local Source Control specialists in the Puget Sound area and the Spokane River Watershed are assisting small businesses in protecting water quality. Recently, technical assistance visits in Kitsap County revealed that some dental offices were not properly handling and disposing of dangerous wastes.

Since May 2008, specialists with Kitsap County Public Works visited 24 dental practices, finding six offices disposing spent x-ray fixer to the sewer without first treating it to remove the silver. Kitsap County Health Department staff found one of fifteen dentists visited disposing of fixer to the sewer.

Spent x-ray fixer contains silver concentrations between 5,000 to 8,000 parts per million (ppm). State regulations allow no more than 5 ppm silver, and Kitsap County has an even more stringent limit of 1 ppm.

Dental amalgam contains mercury, which accumulates in the tissue of fish. This affects the entire food chain. Large fish, like salmon, eat smaller contaminated fish and then people eat the large contaminated fish.

In 2005, Ecology required all dental offices to install and maintain amalgam separators, which extract the mercury from the wastewater before it can enter the sewer. The separators must be ISO 11143 certified and properly maintained.

The resulting waste must be disposed of at permitted treatment, disposal, or recycling facilities.

For specific dental practice guidelines, see the Dental Office Best Management Practices information at: www.ecy.wa.gov/mercury/documents/bmp-poster.pdf.

Local Source Control Specialists are available to assist dentists and other businesses to reduce their dangerous waste, handle it safely, and dispose of it properly. For more information about this free service, or to find the specialist closest to you, visit: www.ecy.wa.gov/programs/hwtr/lsp/index.html, or contact Julia McHugh at (360) 407-6850, e-mail: jmch461@ecy.wa.gov.

Generator Training Postponed

Due to continuing budget and staffing constraints, Ecology will not hold the "Dangerous Waste Management for Generators" classes within the next eight months. Ecology will reassess its resources in the second half of 2009, so check back for updates at: www.ecy.wa.gov/programs/hwtr/workshops/index.html.

In the meantime, you can find answers to your questions about dangerous waste on Ecology's Web site, at: www.ecy.wa.gov/programs/hwtr/business.html.

You can also call the Hazardous Waste and Toxics Reduction staff at your local Ecology Regional Office (numbers are on page 4).

Compliance Inspectors can help with questions about your responsibilities as a dangerous waste generator. **Toxics Reduction staff** can help with questions about reducing and recycling dangerous waste.

Free Recycling of Electronics for Small Businesses!

E-Cycle Washington starts in January! This new program offers free recycling for computers, monitors, and TVs. Small businesses (49 employees or fewer), households, schools, charities, and small governments will be able to drop off these used electronics at approximately 200 collection sites in Washington.

State law requires manufacturers of computers, monitors, and TVs to provide free, end-of-life recycling of their products. Ecology has been working with the manufacturers, retailers, local governments, and non-profit groups to create the E-Cycle Washington program.

Large businesses (50 employees or more) are not eligible for the E-Cycle Washington program, but they are responsible for the safe recycling of their used electronics.

You can find E-Cycle Washington collection sites in your area by calling 1-800-RECYCLE or go to <http://1800recycle.wa.gov/>. If you have very large items or more than 10 items total, call 1-866-779-6632 for help finding the nearest location that can take them.

For more details, go to www.ecyclewashington.org, or contact Miles Kuntz at (360) 407-7157, e-mail: miku461@ecy.wa.gov.



E-CYCLE
washington
ecyclewashington.org

Rumors, Rumors, Rumors

Lately wrong information about Ecology's work has been getting headlines. For example:

Rumor: Ecology is banning lead ammunition.

Fact: Ecology is not recommending any ban or regulations for any type of ammunition beyond current law. Currently, lead **shot** is banned for hunting all waterfowl, coot, snipe and in some specific hunting areas. These restrictions come from the federal government and the Washington Department of Fish and Wildlife (WDFW). Other lead ammunition is not affected.

For the rest of the (true) story, see: Washington's Lead Chemical Action Plan at: www.ecy.wa.gov/programs/swfa/pbt/leadcap/; or WDFW's hunting rules at: www.wdfw.wa.gov/hunting/regs_seasons.html.

When in doubt, check it out. You can also get reliable information from Ecology's Toxic Free Tips service. Call 1-866-939-9991 or visit www.ecy.wa.gov/toxicfreetips/.

Free Waste Reduction Service

For the best waste reduction services that money **can't** buy, call TREE today – Technical Resources for Engineering Efficiency. These free environmental consultations can help your business:

- \$ Reduce waste.
- \$ Save time, money, energy, and resources.
- \$ Follow necessary environmental regulations.
- \$ Stay ahead of the competitive curve.

Call (425) 649-7143 for your free consultation, or go to: www.ecy.wa.gov/programs/hwtr/tree.

Are We Making Progress With Beyond Waste?

Beyond Waste is our state's plan for how we should handle solid and hazardous waste over the long-term. It's a simple concept – eliminating wastes whenever we can and using the remaining wastes as resources.

Are we making progress? Yes, a recent progress report shows significant gains in some key areas. Since 2000, we decreased dangerous waste generation and the associated risks from exposure to toxic releases. We also increased recycling for solid waste, organics, and electronics.

Some trends, however, are disappointing. Despite our recycling efforts, in 2006 Washingtonians threw away \$207 million worth of recyclables.

The good news is that many businesses are creating less hazardous waste per dollar earned. This illustrates that Beyond Waste efforts help businesses, the economy, and the environment. For more specific information, visit the Beyond Waste Web site at: www.ecy.wa.gov/beyondwaste/.

We will update the Beyond Waste plan in 2009. To share your comments and ideas, or get on our e-mail list, contact Chris Chapman at (360) 407-7160, e-mail: ccha461@ecy.wa.gov.



Questions and Answers

Q: Are dangerous waste generators required to train their employees?

A: Yes. The *Dangerous Waste Regulations* require Large and Medium Quantity Generators to train their employees in proper waste handling and emergency procedures in line with the employee's responsibilities. The regulations do not specifically require Small Quantity Generators to train their employees, but they must manage their dangerous waste in a way that does not pose a potential threat to human health or the environment. They would find it hard to comply if they did not have some basic training.

Q: Who is responsible to train individuals – Ecology or the generator/ employer?

A: The generator/employer.

Q: Do the regulations require a certain number of hours of training, such as 8, 40, or 80?

A: No. The regulations do not require a certain length of training.

Q: Ecology has provided workshops in dangerous waste management across the state. Did that training satisfy the generators' responsibility for properly training their employees in the proper management of dangerous waste and emergency procedures?

A: No. Each generator's site is different, so the workshops alone could not satisfy the generator's responsibility to train their employees. Instead, generators were able to use the dangerous waste workshops to help develop their own training plans and to help them realize what their training plans should address. (See "Generator Training Postponed" in this issue.)

Q: Is the training required under the *Dangerous Waste Regulations* the only training needed?

A: No. Other regulations and agencies may require specific training, such as Labor and Industries, local health departments, Fire Marshals, and the Ecology offices of Water Quality, Air Quality, and Spill Prevention, Preparedness and Response.

Department of Ecology

Your business is liable for all dangerous wastes it generates. 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, call your nearest Ecology office:

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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