



Shoptalk

A newsletter about dangerous waste and pollution prevention
Volume 22, No. 1, December 2011 – Publication Number 12-04-001a

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Department of Ecology

Your business is liable for all dangerous wastes you generate. 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 more 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

To ask about available formats for the visually impaired 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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Ecology hosted a two-day exchange with China's hazardous waste management leaders to share information about tracking dangerous waste and Turbowaste.

Celebrating 20 Years of Pollution Prevention

Washington State has a reason to celebrate – 20 years of pollution prevention (P2) results! Back in 1991, people considered pollution prevention a revolutionary approach to environmental protection because it focused on preventing dangerous waste rather than managing it and cleaning up contamination.



Over the next 20 years, Washington State reduced the generation of dangerous waste by 65 percent while the state’s economy continued to grow. Although the economy is down significantly in 2011, businesses, government, and citizens continue to look towards pollution prevention as the most cost effective approach towards environmental protection. Overall, one of the key outcomes from the pollution prevention approach is that environmental protection and economic development are mutually supportive and can help lead us towards a more sustainable future.

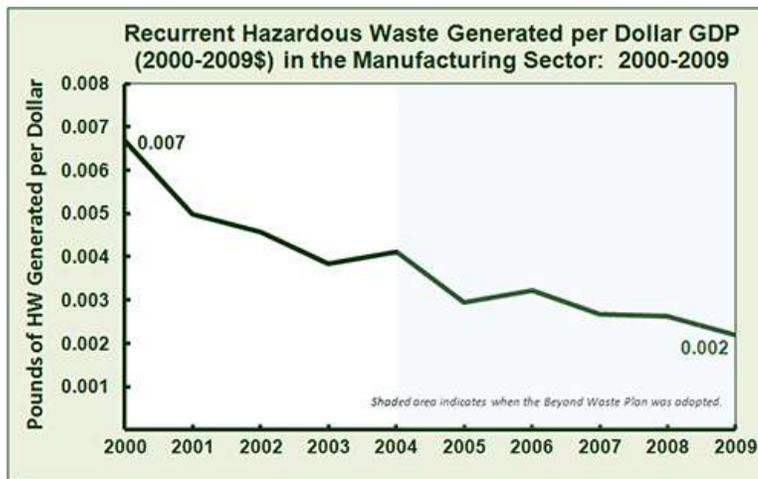


Figure 1: From the Beyond Waste 2011 Progress Report

Pollution prevention brought a fresh perspective and galvanized businesses and government to focus on reducing pollution at the source. Ecology supported these efforts through our Pollution Prevention Planning Program to encourage and promote best practices to reduce waste and emissions.

There were lively debates in the early days about the definition of pollution prevention. The focus was to move “beyond compliance” and end-of-pipe treatment approaches toward a more comprehensive view of environmental protection. Pollution prevention emphasized a multi-media (waste, water, energy, etc.)

approach where “green teams” established goals, measured progress, and celebrated results.

Washington State’s initial focus was on reducing the generation of dangerous waste and emissions reported through the Toxics Release Inventory (TRI). Manufacturers began to report publicly on toxics use and releases of waste materials to the environment. The disclosure of this information created public awareness and spurred companies to publicly demonstrate efforts to reduce toxics and wastes.

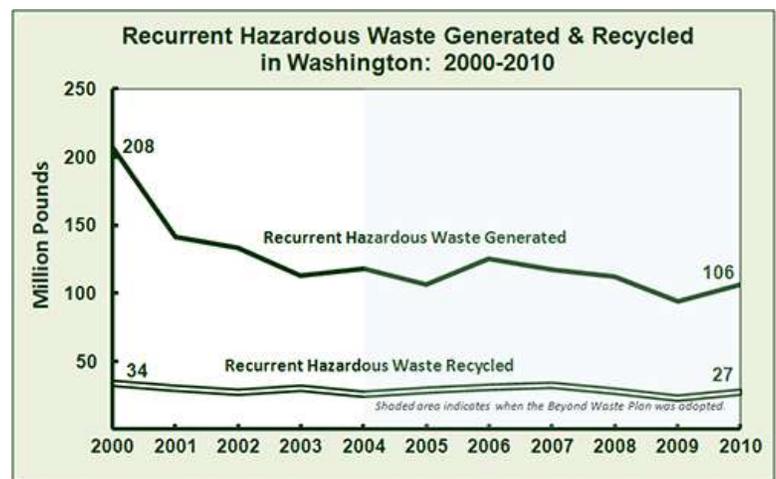


Figure 2: From the Beyond Waste 2011 Progress Report

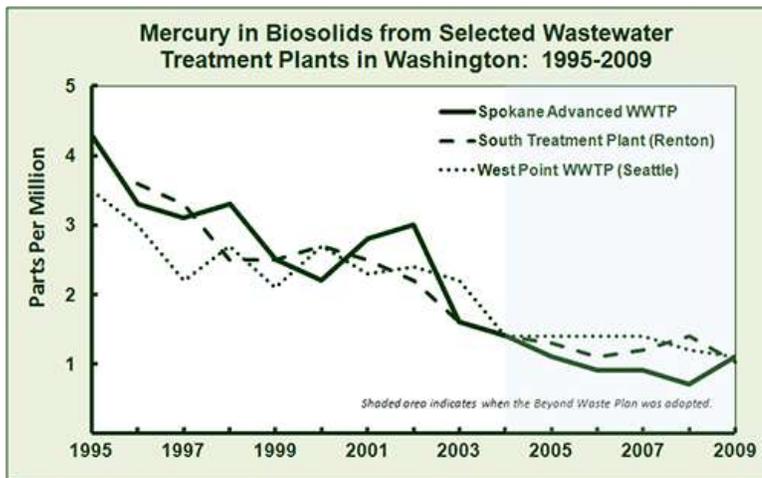


Figure 3: From the Beyond Waste 2011 Progress Report

Pollution prevention has always focused on achieving results. New tools and technical assistance created a solutions-oriented approach – from the development of environmental cost accounting, environmental management systems (EMSs), and environmentally preferable purchasing (EPP), to the new approaches of “lean and environment” and design for the environment (DfE).

In today’s difficult economy, more and more companies see the importance of taking a comprehensive approach to their production. They consider the costs of handling and

disposal as well as the price of ingredients. By avoiding dangerous substances they reduce their liability, improve worker and community safety, gain access to “green” markets here and internationally, and benefit from the good reputation their products enjoy due to a solid regulatory structure.

Safer Chemicals Garner National Award for Cintas-Washington State

A move towards safer chemicals led by its Washington facilities brought Cintas Inc. a national award for pollution prevention. Cintas, an Ohio-based industrial laundry service, has three facilities in Washington. The Cintas-Washington State facilities implemented a program to eliminate 25,000 gallons of detergent containing nonylphenol ethoxylates (NPEs) in the laundry process. They also saved \$171,000 through water conservation, and \$60,000 in energy use.

NPEs are nonionic surfactants. They are highly toxic to fish and other water-dwelling organisms. In the environment they degrade to the more environmentally persistent and even more toxic nonylphenol. Cintas is using non-NPE detergents throughout the company. Now the national trade organization, Textile Rental Services Association, has proposed to eliminate NPE products by 2013.



Photo 1: James Wagoner, executive director of Cintas Inc., receives the national pollution prevention award from Jeffrey Burke of the National Pollution Prevention Roundtable.

The Cintas-Washington facilities’ efforts reduced water use by 33 percent – more than 19 million gallons each year – and energy use by 50 percent. They also adopted water reuse technologies and reused 240,000 gallons of water.

In presenting the award to Cintas and others, Jeffrey Burke, executive director of the National Pollution Prevention Roundtable, said, “These organizations have clearly demonstrated that pollution prevention is beneficial to both the environment and the economy. They are being recognized for their leadership and commitment to promoting a sustainable future.”

Assessing the Safety of Chemical Alternatives

Providing Guidance on Alternative Assessments

As manufacturers strive to remove toxic chemicals from their products, many want assurances that the alternatives they choose are safer than the chemical they replaced. An "alternatives assessment" is a tool to make clearer risk-based choices. Ecology is collaborating with seven other states through the Interstate Chemicals Clearinghouse, or IC2, to develop a guidance document to help the transition to safer chemicals. A grant from the US Environmental Protection Agency funds this work.



Alternatives assessments evaluate alternatives to toxic chemicals to minimize or eliminate the potential for unintended consequences. In too many cases, toxic chemicals are replaced with other chemicals that are as bad as or worse than the original. Companies avoid this problem by conducting a risk-based alternative assessment. They can then replace toxic chemicals with chemicals that are safer and therefore better for human health and the environment. The alternative assessment guidance will offer tools to compare chemicals in products and processes that will lead to selecting safer alternatives to toxic chemicals.

The framework will be available for stakeholder review and input. Ecology plans two Webcast meetings in the winter and spring of 2012 to discuss the framework and a draft version of the alternative assessment guidance.

For More Information

Dr. Alex Stone, Ecology's Safer Chemical Alternative Chemist, is leading this effort for Ecology. If you have any questions or concerns about the alternative assessment guidance document, please contact him at alex.stone@ecy.wa.gov or (360) 407-6758. If you have any questions about the stakeholder process, please contact Linda Glasier at linda.glasier@ecy.wa.gov or (360) 407-7355.

If you wish to keep up-to-date on opportunities to provide input to the development process, please join the listserv.

New Resources for Schools and Analytical Labs

Ecology now has a new Web page of pollution prevention resources for schools and analytical labs. Staff developed this resource as part of the Toxic Metals Prevention Project.

These resources identify methods for reducing the use of toxic metals, such as mercury, lead, and cadmium, reducing the volume of waste generated, or removing the metals altogether. They provide contacts for successful opportunities implemented by K-12 schools, colleges, universities, and analytical laboratories.

The page lists resources alphabetically within each category. Some resources are cross-referenced because they apply to multiple categories. Federal, state, and local regulations still apply.

Looking for More Participants

The University of Puget Sound and Pacific Lutheran University have agreed to partner with the Labs and Schools Team to eliminate or reduce these metals of concern. The metals targeted may be present in many areas of your campus, classes, and labs. We are looking for additional lab and school participants interested in making changes at their facility. We hope to showcase the successful activities.



If you need more information about the schools and labs project, please contact Leatta Dahlhoff at (360) 407-6339 or leda461@ecy.wa.gov.

Toxic Metals Prevention Project

The Toxic Metals Prevention Project is a joint effort between the Department of Ecology and Washington's larger businesses that participate in Pollution Prevention (P2) Planning. The project's goal is to identify safer alternatives to toxic metals. Though several metals are toxic, this effort will first focus on mercury, lead, and cadmium. Participation in the Toxic Metals Prevention Project is voluntary. Ecology is not banning the use of these metals. However, reducing the use of toxic metals makes good sense.

Reducing the use of toxic metals can help businesses decrease their liability, and save money on waste disposal. Toxic metals can pose a risk to workers when produced, shipped, stored, packaged, and eventually disposed. Reducing the use of toxic chemicals is the smartest, cheapest, and healthiest approach to lowering risk to living things and the environment.

For more information on the Toxic Metals Prevention Project, please contact Tom Boucher, at (360) 407-6462 or tbou461@ecy.wa.gov.

Better Brakes Rule Workshops

Ecology is hosting two free public workshops on the draft rules to carry out Washington's Better Brakes Law. The law restricts the use of heavy metals and asbestos, and phases out the use of copper in brake pads and shoes. One workshop will be in person and one will be hosted online. The in-person workshop is on January 26, 2012, from 9 a.m. until noon (Pacific standard time) in Tukwila, Washington. The online workshop is on January 31, 2012, from 10 a.m. until noon (Pacific standard time). For details, please visit Ecology's Better Brakes Web site. You can sign up to a listserv there, too.



The Washington Legislature passed a law in 2010 to reduce the use of toxic material in automotive brake pads and shoes. The law restricts the use of several heavy metals and asbestos, and provides for a phase-out of copper over the next 15-20 years.

As brake pads wear down, they shed copper and other metals on roadways, which then wash into streams and rivers. In urban areas, brake pads account for up to half of the copper entering our waterways. Copper is highly toxic to fish, especially young salmon, and other aquatic species. Removing copper and other toxic metals from brake materials will help to clean up Puget Sound and water bodies around the state.

Ecology is working with brake pad manufacturers, automakers, Washington businesses, environmental groups, and other interested parties to develop rules for the law. The workshop is part of the rule-making process. It will be one of the primary opportunities for people to comment on the draft language before the rule becomes final. People will be able to participate in the workshop either in person or over the internet. The event is free but registration is required.

The Hazardous Waste and Toxics Reduction Program Improves its Web Pages

Easier Navigation, New Content

We have improved the organization of our Web pages and added content that should make it easier for users to find exactly what they want. The site's new elements are based on feedback from the business community and other users. The improvements may even make the Dangerous Waste Rules easier to understand and comply with.



Some new features include:

- Easy-to-read discussions of many dangerous waste topics.
- Business-specific information on managing waste.
- Enhanced resources for reducing waste.

The site will help businesses understand drum and container labeling, accumulation dates and storage limits, requirements for recycling, secondary containment, and more. There are also guidelines for materials common to many shops, such as shop towels, mercury-containing light bulbs, aerosol cans, used oil, and paint waste.

The site is now easier to navigate, so visitors have better options to help them find what they are looking for. Further improvements will come soon, based on comments from users and evolving technology.

We welcome your suggestions to improve this Web site. To comment on the content of the revised Web pages, please contact Diana Olegre at (360) 407-6609 or dole461@ecy.wa.gov. If you find broken links or have problems navigating the Web site, please contact Joan Morris at (360) 407-6757 or jmor461@ecy.wa.gov.

Annual Reports Due March 1, 2012

If your site had an active RCRA Site ID Number in 2011, you need to submit a 2011 Dangerous Waste Annual Report to the Department of Ecology by March 1, 2012. Ecology is mailing a reminder notice at the end of December to all reporters for sites with active RCRA Site ID Numbers. Electronic reporters received e-mails as well.

To get started on your Annual Report, go to the TurboWaste.net site and click on the orange “Enter TurboWaste” button.



For more information and help with your report, go to the Dangerous Waste Annual Report Web site. If you have questions about your 2011 generator status, or RCRA Site ID Number, please call your local Ecology office and ask to talk to a dangerous waste specialist. If you have questions about the management or recycling of your waste after you shipped it, please call your waste contractor.

Tier Two Reports due March 1, 2012



It's December, the New Year is coming soon, and many businesses are once again facing a variety of reports and deadlines in the approaching months.

If your facility stores hazardous substances, it's time to begin reviewing inventory records to see if you meet reporting requirements for Tier Two - Emergency & Hazardous Chemical Inventory Reporting.

Is your facility required to report? The Emergency Planning and Community Right to Know Act (EPCRA) defines hazardous substances as chemicals present in the workplace that are capable of causing harm. Any product that requires a Material Safety Data Sheet is potentially reportable. You must report if you had 10,000 pounds or more of a chemical or hazardous substance, such

as gasoline or diesel. Chemicals classified as Extremely Hazardous Substances (EHS), such as ammonia and chlorine, are reportable at much lower thresholds – ammonia at 500 and chlorine at 100 pounds. These requirements apply to the maximum amount of a chemical or product on site at any one time during the previous calendar year.

The federal government created Section 312 of EPCRA, also known as SARA Title III. It requires a business storing hazardous substances to submit a Tier Two report to the State Emergency Response Commission (SERC), to the Local Emergency Planning Committee, and the local fire department.

The Commission and local agencies use this information for pre-disaster planning and local emergency response purposes. EPCRA is an integral part of successful disaster prevention, preparedness, and response. The address of the Commission is:

Washington State Emergency Response Commission
Community Right-to-Know Unit
PO Box 47659
Olympia WA 98504-7659

The quickest and most efficient way to report is to submit via Tier Two Online. This online reporting application allows you to:

- Easily upload previously submitted data.
- Quickly update your information.
- Submit directly to the SERC with just a click.
- Print completed forms to send to your local agencies and for your records.

To determine if your company needs to report on March 1, 2012, and for more information regarding the reporting process and Tier Two Online registration, please visit our EPCRA website.

For EPCRA training, please contact your Local Emergency Planning Committee. Ecology's Community Right-to-Know Specialists can provide technical and regulatory assistance. Please contact us at epcra@ecy.wa.gov or call (800) 633- 7585. Press "2" at the greeting to reach the Community Right-to-Know Specialists.

EPA Launches Green Products Web Portal



The U.S. Environmental Protection Agency (EPA) has a new green products web portal, at www.epa.gov/greenerproducts. The portal provides easy access to information about everyday products like home appliances, electronics, and cleaning products that can save money, prevent pollution, and protect people's health.

Consumers can find electronics and appliances that have earned EPA’s Energy Star label and can browse WaterSense products that help save energy and water. Additionally, consumers can find information about cleaning products that are safer for the environment and people’s health. These products bear the EPA Design for the Environment (DfE) label. The website will also help manufacturers and institutional purchasers with information on standards and criteria for designing greener products.

“By purchasing greener products, consumers can help reduce air pollution, conserve water and energy, minimize waste and protect their children and families from exposure to toxic chemicals, while also creating green jobs,” said Steve Owens, assistant administrator of EPA’s Office of Chemical Safety and Pollution Prevention, “Pollution Prevention is good for our health, our environment, and our economy.”

For more information on EPA’s Pollution Prevention programs, visit <http://epa.gov/p2/>.

Looking for a Facility Notice? Join the Listserv

We are updating our listserv of people interested in getting information on used oil and dangerous waste management facilities in Washington. We use this list when sending notices about permits for facilities that recycle, treat, store, or dispose of hazardous waste or used oil.

Notices may be about:

- A proposal to site a new facility.
- A draft or final decision to issue or deny a permit.
- A request to modify an existing permit.
- A decision to approve or deny a permit modification.
- Plans to close a facility.



Please join the free electronic listserv at <http://listserv.wa.gov/cgi-bin/wa?A0=DWFACILITIES-PUBLIC-NOTICE>. If you prefer hard copies, contact Nancy Farman, Public Involvement Coordinator for the Hazardous Waste & Toxics Reduction Program, at (360) 407-0272 or nfar461@ecy.wa.gov.

China's Environmental Ministry Visits to Learn About Dangerous Waste Tracking

China and Ecology got a little closer recently when a delegation from the Chinese Ministry of Environmental Protection (the “EPA” equivalent for China) came to learn about how we track dangerous waste in Washington.

We hosted a two-day exchange in August with China’s hazardous waste management leaders and a top information technology professional. The delegates visited Ecology’s Northwest Regional Office to meet with Hazardous Waste and Toxics Reduction (HWTR)



Photo 2: Delegates from the Chinese Ministry of Environmental Protection on a field trip to the Philip Environmental Services Corporation facility in Kent during their visit with the Hazardous Waste and Toxics Reduction Program.

staff and learn about the TurboWaste system.

TurboWaste is Ecology's online reporting system and database for businesses that generate larger amounts of dangerous waste. About 4,000 businesses have used the system for their Dangerous Waste Annual Reports. China is looking to build a similar system, and came to learn more about Washington's approach to tracking and managing dangerous waste.

The delegation was particularly interested in how the HWTR program works with our federal Environmental Protection Agency (EPA) counterparts. The Chinese expect to track over 200,000 businesses spread across 31 provinces. Currently, they track hazardous waste information on paper only. Their interest in TurboWaste reminds us that we're an international leader in the efficient collection and management of dangerous waste related data.

The delegates also made a field trip to Philip Environmental Services Corporation, a dangerous waste treatment, storage, and disposal (TSD) facility in Kent. The Chinese wanted to hear directly from a regulated business that uses TurboWaste. The delegates was interested to hear that Ecology included Philip's business needs in the development of TurboWaste.

The delegation's leader, Mr. Li Xinmin, Director General for the Department of Pollution Prevention and Control, is China's national leader for addressing hazardous waste. He was particularly interested in the agreement between the EPA and Ecology, where Ecology has to approve EPA doing certain regulatory tasks. Mr. Li explained that was different from the hierarchical structure in China. The delegates seemed equally surprised that local government has authority over both state and federal agencies on some environmental matters, such as wastewater discharges, zoning, and local air permits.

We know how challenging it is to manage Washington's dangerous waste for a population of 6.8 million residents. Imagine trying to do this for a population of 1.3 billion!



Photo 3: The Chinese delegation with staff from the Hazardous Waste and Toxics Reduction Program.

Links to Resources Mentioned in this Issue

Celebrating 20 Years of Pollution Prevention

- Pollution Prevention: <http://www.ecy.wa.gov/programs/hwtr/reducewaste.html>
- Environmental Protection and Economic Development:
<http://www.ecy.wa.gov/programs/hwtr/P2/success/p2success.html>
- Pollution Prevention Planning Program: <http://www.ecy.wa.gov/programs/hwtr/p2/p3.html>
- Definition of Pollution Prevention: <http://www.ecy.wa.gov/programs/hwtr/P2/whatisp2.html>
- Toxics Release Inventory: <http://www.ecy.wa.gov/epcra/section313.html>
- Environmental Management Systems: <http://www.epa.gov/wastes/inforesources/ems/>
- Environmentally Preferable Purchasing: <http://www.ecy.wa.gov/programs/swfa/epp/index.html>
- Lean and Environment: <http://www.ecy.wa.gov/programs/hwtr/lean/index.html>
- Design for the Environment: <http://www.epa.gov/dfe/>
- Local regional office: <http://www.ecy.wa.gov/org.html>

Assessing the Safety of Chemical Alternatives

- Chemical Alternative Assessment Listserv: <http://listserv.wa.gov/cgi-bin/wa?SUBED1=ECOLOGY-CHEM-HAZ-ALT-STAKEHOLDER&A=1>

New Resources for Schools and Analytical Labs

- Resources for Schools and Analytical Labs:
<http://www.ecy.wa.gov/programs/hwtr/P2/schoolsAndLabs/Index.html>
- Toxic Metals Prevention Project: http://www.ecy.wa.gov/programs/hwtr/p2/metals_project.html
- Pollution Prevention (P2) Planning: <http://www.ecy.wa.gov/programs/hwtr/p2/p3.html>

Better Brakes Rule Workshop January 26, 2012

- Better Brakes Web site: <http://www.ecy.wa.gov/programs/hwtr/betterbrakes.html>

HWTR Program Improves its Web Pages

- HWTR Web pages: <http://www.ecy.wa.gov/programs/hwtr/index.html>
- Dangerous Waste Topics: <http://www.ecy.wa.gov/programs/hwtr/managewaste.html>
- Business-specific Information: http://www.ecy.wa.gov/programs/hwtr/business_type/index.html
- Reducing Waste: <http://www.ecy.wa.gov/programs/hwtr/reducewaste.html>
- Drum and Container Labeling:
http://www.ecy.wa.gov/programs/hwtr/manage_waste/containers.html
- Accumulation Dates and Storage Limits:
http://www.ecy.wa.gov/programs/hwtr/manage_waste/accumulation.html
- Requirements for Recycling: http://www.ecy.wa.gov/programs/hwtr/manage_waste/recycling.html
- Secondary Containment:
http://www.ecy.wa.gov/programs/hwtr/manage_waste/secondary_containment.html
- Shop Towels: http://www.ecy.wa.gov/programs/hwtr/dangermat/shop_towels.html
- Mercury-containing Light Bulbs:
http://www.ecy.wa.gov/programs/hwtr/dangermat/universal_waste_lamps.html
- Aerosol Cans: http://www.ecy.wa.gov/programs/hwtr/dangermat/aerosol_cans.html
- Used Oil: http://www.ecy.wa.gov/programs/hwtr/dangermat/oil_index.html

- Paint Waste: http://www.ecy.wa.gov/programs/hwtr/dangermat/paint_index.html

Annual Reports Due March 1, 2012

- TurboWaste.net site: <https://fortress.wa.gov/ecy/turbowaste/Login/Splash.aspx>
- Dangerous Waste Annual Report Web site: <http://www.ecy.wa.gov/programs/hwtr/waste-report/index.html>
- Local Ecology Offices: <http://www.ecy.wa.gov/org.html>

Tier Two Reports Due March 1, 2012

- Required to Report?: http://www.ecy.wa.gov/epcra/EPCRA312_flowchart.pdf
- Emergency Planning and Community Right to Know Act: <http://www.ecy.wa.gov/epcra/whatis.html>
- State Emergency Response Commission: <http://www.ecy.wa.gov/epcra/serc.html>
- Emergency Planning Committee: <http://www.ecy.wa.gov/epcra/lepclist.html>
- Tier Two Online Registration: <http://www.ecy.wa.gov/epcra/epcramail.html>
- EPCRA Web site: <http://www.ecy.wa.gov/epcra/index.html>

EPA Launches Green Products Web Portal

- Web Portal: <http://www.epa.gov/greenerproducts>
- EPA's P2 Programs: <http://epa.gov/p2/>

Looking for a Facility Notice? Join the Listserv

- Listserv: <http://listserv.wa.gov/cgi-bin/wa?A0=DWFACILITIES-PUBLIC-NOTICE>