



Shoptalk

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A quarterly
publication
of the Solid and
Hazardous Waste
Program

Bringing Generators Into The System

Government regulators often talk about hazardous waste generators who are either in or out of the "system." What is the "system"? How do people get "in"? Read on to find out how and why Ecology wants to bring businesses into the hazardous waste regulatory system.

Why Is There A System?

Washington business and industry produces over 300,000 tons of hazardous waste each year. That's enough waste to fill more than half the Kingdome.

Poorly handled hazardous wastes pose real threats to people and the environment; they pollute our drinking water, hurt worker health and safety, and create more toxic Superfund sites. Hazardous waste regulations, as well as waste reduction and recycling strategies, help prevent these problems.

What Is The "System?"

The word "system" is used to describe the network of local, state and federal hazardous waste regulations and requirements. Being in the state and federal system means you have evaluated your wastes to see if they are hazardous, determined that your business falls into regulated generator status, applied for a State/EPA identification

number, and reported annual hazardous waste production to Ecology. Being in the local system means your business generates hazardous waste in small quantities that are exempt from most state and federal regulations but covered by local plans (see *Moderate Risk Waste* article on page 3).

How Many Are In The System?

The 3,500 known generators reporting to Ecology account for most of the hazardous wastes generated in Washington State. However; Ecology estimates there may be as many as 50,000 businesses and institutions generating some amount of hazardous waste that are not in the system — these businesses and institutions are compromising the quality of the environment, sacrificing worker health and safety, and risking liability for their actions.

Why Should I Get Into The System?

For two simple reasons. First, the law requires you to! It's that simple. You are obligated to evaluate your wastes to determine if they are hazardous, and, depending

on the type or amount of hazardous waste, comply with local or state and federal requirements. Remember — if your business practices are sloppy or suspicious, someone — a neighbor, customer or competitor — will likely report it. Don't be caught in violation of the most basic legal requirements!

Second, when you enter the system you'll join other businesses in promoting human health and a clean environment. That's good for business.

If you haven't yet notified Ecology, and you need to, do it now. You won't be penalized for your delay in entering the system. If you have notified Ecology, you are already part of a system that helps protect and preserve the environment, and ensures that you are in compliance with the law.

How Do I Get Into The System?

Ecology can only steer you in the right direction; it's up to you to act. If you've completed the Hazardous Waste Checklist from the previous issue of *Shoptalk* and determined that you are a regulated generator, take the first step: call Ecology's hazardous waste report number at (206) 459-6387 and request a State/EPA identification number. Staff there will be glad to assist you.

Quality Control Manager for United Coatings in Spokane reviews paperwork with an Ecology inspector.

Inside:

Introducing WRRLC	2
Waste Expo '91	2
Ecology Hotlines	2
SARA Title III	3
Moderate Risk Waste	3
Regulation Amendments	3
Questions and Answers	4

Introducing the WRRLC Program

Welcome to the second issue of **Shoptalk!** As you learned in the first issue, reducing hazardous wastes makes sense. You can decrease costs and liabilities, increase worker safety and benefit public health and the environment. That's where Ecology's Waste Reduction, Recycling and Litter Control (WRRLC) Program comes in. WRRLC provides waste reduction information to businesses, schools, government agencies and the public.

Waste Reduction Assistance

WRRLC staff are available to assist you in identifying hazardous substances and waste reduction opportunities. Workshops, videos, phone consultations, written manuals, fact sheets and on-site visits are some of the services offered by WRRLC. The program also has a resource center with access to national and international publications on waste reduction.

New Waste Reduction Law

WRRLC is currently implementing the new Hazardous Waste Reduction Act, passed by state legislators in 1990. This law reaffirms that reducing hazardous substances and hazardous wastes is the number one waste management priority in Washington State.

The law sets a statewide goal of reducing hazardous wastes 50 percent by 1995 and requires certain hazardous waste generators (those generating more than 2640 pounds per year) and certain hazardous substance users (those required to report under SARA Title III, see related article on page 3) to prepare waste reduction plans. Preparation of plans is mandatory, but each facility uses its own judgement in deciding which waste reduction options to implement.

Planning Assistance

Fees established through this legislation will allow Ecology to help those facilities required to prepare plans, and other facilities desiring assistance. A guidance manual, "Planning for Success Through Waste Reduction," offers detailed information on how to prepare a plan and establish a waste reduction program at your facility.

For more information about the services offered by WRRLC, call 1-800-RECYCLE. For more detailed information on the RECYCLE Hotline, see the *Hotline* article in the next column.

We look forward to assisting you in the near future.



Bill Alkire
Program Manager
WRRLC

Waste Expo '91

The Inland Northwest Waste Information Expo '91 offers help to businesses hoping to reduce, recycle and better manage their wastes. The Expo will bring together companies that need and provide equipment, products and services for waste reduction, recycling and disposal. It's also a chance to ask questions and get answers from government regulators and experts.

The date is May 8, the location is Cavanaugh's Inn in Spokane, and the cost is only ten dollars. To register, or for more details, call Ecology's Eastern Regional Office at (509) 456-4478.

Early notice for Puget Sound area businesses: a similar event, *Northwest Waste Expo '91*, is scheduled for November 12 and 13 in Seattle. Mark your calendar.

Ecology Hotlines

Ecology has two toll free hotlines that can provide valuable information to your business.

1-800-RECYCLE provides technical assistance to businesses trying to reduce and recycle their wastes. Callers run the range from small automotive service stations wondering how they can reduce their hazardous waste generation to large national companies considering ways to implement less toxic alternatives in their daily industrial processes. When you dial 1-800-RECYCLE you can expect:

- ✓ industry-specific waste reduction and recycling fact sheets available upon request; and
- ✓ connections (when necessary), with an Ecology regional office where you will receive in-depth attention to your waste reduction and recycling needs,

The Hazardous Substance Information Office (1-800-633-7585) is another Ecology hotline. This hotline responds to requests for information about hazardous chemicals in the community. Typical questions include, "My business produces 15 gallons of photochemical waste per month. What should I do with it?" or "Does my business have to report under SARA Title III?" When you dial 1-800-633-7585, you can expect:

- ✓ specific information on SARA Title III; hazardous substances and emissions reported under the Community Right-to-Know laws; health and toxic effects resulting from exposure to hazardous chemicals; and
- ✓ general information to assist small quantity generators with hazardous waste disposal,

Both hotlines are staffed during weekday business hours (RECYCLE hotline open Saturdays). Remember, it is not the purpose of either hotline to answer questions about hazardous waste regulatory requirements — contact a hazardous waste specialist at your nearest Ecology regional office instead.

Is Your Business Subject to SARA III?

Many businesses are unaware of their responsibilities under SARA Title III (also known as the Emergency Planning and Community Right-to-Know Act). Signed into law by Congress in 1986, one of its aims is to allow the public access to information on hazardous chemicals in their community.

Two annual reports must be filed under SARA Title III. The Toxic Release Inventory Report (Form R) describes environmental releases of listed chemicals to the state and EPA. This form is filed by certain manufacturers who have ten or more full-time employees and annually process or manufacture 25,000 pounds or otherwise use 10,000 pounds of a listed chemical (for example, using trichloroethylene to degrease materials).

The Hazardous Chemicals Inventory Report (Tier 2 Report) is filed annually by all companies that store more than 500 pounds of a listed Extremely Hazardous Chemical or 10,000 pounds of any other hazardous substance.

To learn more about reporting requirements and listed chemicals under Community Right-to-Know, call the Hazardous Substance Information Office at 1-800-633-7585.

Moderate Risk Waste

Moderate risk waste is hazardous waste that is exempt from most state and federal regulations because it is generated in households, or by businesses in quantities typically less than 220 pounds per month (or about half of a 55-gallon drum). Examples of moderate risk waste include spent solvents, used batteries and unused waste paint.

Businesses that generate moderate risk waste, known as small quantity generators, are required by state law to properly identify, dispose of, or recycle their wastes. If these steps aren't followed, moderate risk waste becomes fully regulated.

In addition, all counties are developing (or have already developed) Local Hazardous Waste Management Plans. These plans include waste reduction programs, education efforts and collection events to help generators manage their moderate risk waste. Ecology will provide counties with financial and technical assistance to implement their plans.

For more information about moderate risk waste, contact your local solid waste utility or health department, or the moderate risk waste coordinator at your nearest Ecology regional office.

Regulation Amendments

On April 7, 1991 Ecology's new and improved rules for hazardous waste management became effective state-wide. The new rules amend the Dangerous Waste Regulations, Chapter 173-303 WAC and were developed to make the regulations more clear, practical, enforceable and environmentally protective. The major changes include:

✓ **Hazardous Wastewater:** new rule restricts unpermitted or untreated discharge of hazardous waste to the sewer. **Effect:** generators must obtain a pretreatment, NPDES or state wastewater discharge permit, or written authorization from their sewer utility, and comply with the requirements of WAC 173-303-802 to discharge hazardous wastewater.

✓ **Recycling Facilities:** new rule requires commercial, off-site hazardous waste recyclers to comply with additional storage standards, personnel training, waste screening tests and record keeping requirements. **Effect:** generators who contract with these recycling facilities may see a small to moderate cost increase.

✓ **Spill Reporting:** new rule requires all spills of hazardous wastes and hazardous substances to be reported to your nearest Ecology regional office. **Effect:** generators should take greater care in preventing and reporting all spills.

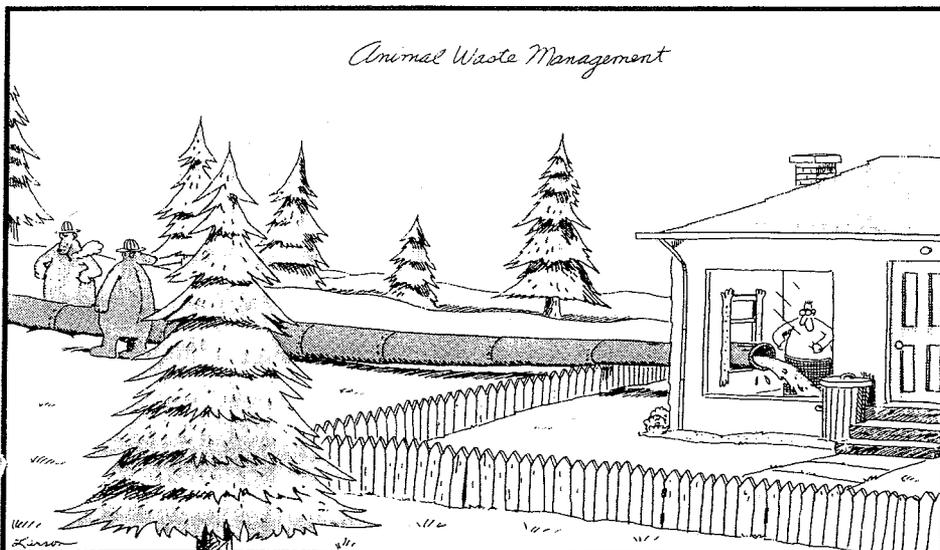
Copies of the revised regulations will be available after May 15. For more information, call your nearest Ecology regional office.

Remember

Your business is liable for all hazardous wastes generated. If you are uncertain about your responsibilities as a hazardous waste generator, call your nearest Ecology regional office and ask for a hazardous waste specialist.

Redmond (206) 867-7000
Tumwater (206) 753-2353
Yakima (509) 575-2490
Spokane (509) 456-2926

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Questions and Answers

Q It seems like there are so many kinds of "waste" that I can't keep them straight! Can you help?

A Yes. The list and drawing below will help clarify some commonly-used waste terms:

✓ **solid waste** - any discarded material (solid, liquid or gas) that has been abandoned, is naturally waste-like, is stockpiled before recycling, or is re-used in a manner constituting disposal (such as application of oil for dust control).

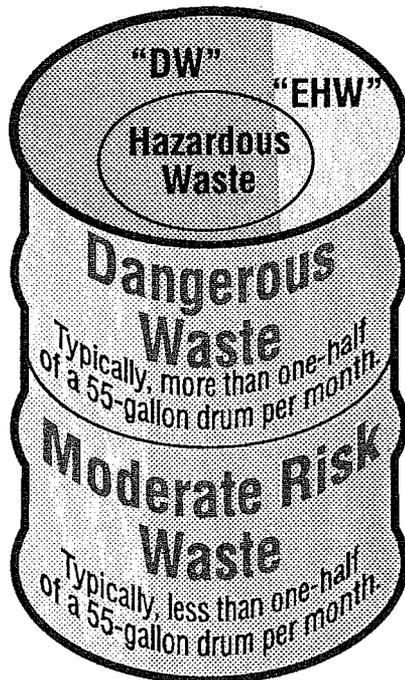
✓ **hazardous waste** - any solid waste with certain properties that could pose dangers to human health or the environment (such as spent solvents, ink sludges or cyanide wastes). This term is federal in origin and covers all wastes EPA considers hazardous.

✓ **dangerous waste** - a state term including all federal hazardous wastes, plus additional wastes that are regulated in Washington State due to toxicity, persistence or carcinogenicity. Dangerous wastes fall into two categories — either "DW" or "EHW" — and typically become regulated when more than 220 pounds are produced per month (or more than half of a 55-gallon drum).

✓ **"DW"** - those dangerous wastes that are dangerous but not extremely hazardous.

✓ **"EHW"** - those dangerous wastes that are extremely hazardous because of their greater threat to human health and the environment.

✓ **moderate risk waste** - dangerous waste that is exempt from most state and federal regulations because it is generated in households, or by businesses in quantities typically less than 220 pounds per month (or about half of a 55-gallon drum).



Q I hear that used oil filters are now hazardous waste and can't be put in dumpsters anymore, even after crushing. Is this true, and if so, is recycling these filters an option?

A The final regulatory status of used oil filters is uncertain, so for the next six months Ecology will not *require* generators to test, designate or manage used oil filters as hazardous waste.

During this time, Ecology encourages generators to seek out recycling options and properly handle used oil filters as either hazardous or municipal solid waste.

To receive a fact sheet that provides interim guidance on used oil filters, call your nearest Ecology regional office.

Shoptalk

Shoptalk welcomes your questions and comments. Please address them to:

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