



Shoptalk

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Sewers and Hazardous Waste Don't Mix

It is becoming harder to use the sewer as a solution for getting rid of hazardous wastes. Many generators find it convenient to dispose of their wastes into the sewer system. However, whether your business is large or small, it is illegal in Washington to discharge hazardous waste to the sewer unless you meet the conditions of Ecology's "permit-by-rule".

"Permit-by-rule"

All businesses and institutions that discharge hazardous wastes to the sewer need to be aware of Ecology's permit-by-rule requirements. Businesses and institutions affected include:

- ✓ auto repair shops dealing with sump sludge separator water or used antifreeze,
- ✓ circuit board manufacturers dealing with solvent-contaminated waste water,
- ✓ electroplaters dealing with a variety of rinsewater wastes,

✓ photolabs dealing with faulty metal recovery systems,

✓ janitorial crews at schools, hospitals or other institutions dealing with cleaning product wastes.

So what is permit-by-rule and how does it apply to businesses or institutions that generate hazardous waste? Permit-by-rule isn't a certificate or written permit that you get in the mail — it is a series of steps that you perform. When you've followed all the steps, you possess, by virtue of meeting these requirements, a permit-by-rule.

The Bottom Line

In order to have a permit-by-rule, you need to do four things:

Treat your wastes before discharging them into the sewer. "Treatment" generally means converting a hazardous waste to make it less hazardous, and permit-by-rule requires that you have the means on-site (such as a wastewater treatment unit) to treat your wastes prior to discharge.

Get a water quality permit. This means securing one of the following permits: a pretreatment permit (or written discharge authorization) from your local sewer district — or a NPDES (National Pollutant Discharge Elimination System) permit or a state waste discharge permit. Contact your local sewer district first to discuss which option is available to you.

Notify Ecology. Contact Ecology's annual report staff at (206) 459-6387 to get on record as a permit-by-rule facility.

Comply with remaining requirements. These requirements, found in Chapter 173-303-802(5) of the Dangerous Waste Regulations, include emergency and contingency planning, understanding the nature of the waste being treated (designation), and basic recordkeeping and reporting requirements.

Skip the Sewer

As you can see, complying with permit-by rule is not a simple matter. In fact, it may not be the best option for dealing with your hazardous waste. It may make more sense not to discharge at all, but rather to find ways to recycle, re-use or treat wastes or wastewater to make them non-hazardous. (See the wastewater reduction article on page 2.)

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Environmental engineer from SEH America, Inc. in Vancouver points out how wastewater treatment is an important part of their silicon wafer manufacturing process.



Wastewater Reduction Makes Sense

Washington businesses are faced with increasing costs for using water and for discharging wastewater. Most municipal utilities have raised their rates significantly in the last few years, and businesses which have NPDES or state wastewater discharge permits are paying increased permit fees. Hazardous waste disposal fees are climbing too, so the cost of disposing of contaminated wastewater is rising as well.

For many businesses, reducing wastewater is fast becoming a high priority. If you have been looking for ways to reduce wastewater and save money, consider these tips:

✓ **Look for ways to use less water.** Circuit Partners, Inc., a circuit board printer in Issaquah, began a program in 1985 to recover copper from its plating bath solutions and rinsewaters. Plate-out units were installed to recover the metal for resale to recyclers. These units generated revenue while extending the life of rinse baths. Less water was needed to do the same job, and less potentially hazardous wastewater was generated. Water consumption has dropped by nearly 90% since 1981, while Circuit Partners has realized a 45% growth in business.

✓ **Recycle and re-use water.** Some industries have reduced their water usage by as much as 95% by recycling. They save not only on water costs but on discharge fees and permitting requirements, and environmental impacts are greatly reduced.

"We started by closing down all drains in the plant," said Ben Cristel, of Tam Engineering in Tacoma. Major reduction in wastewater was achieved through recycling of water-based cleaning, anti-rust and grinding solutions. Together these methods reduced wastewater by 250,000 gallons a month and also saved on chemical costs. Examine your processes to see if you can use recycled plant wastewater.

✓ **Install water-saving devices:**
—*Flow restrictors* on supply lines are among the most effective water savings devices for business. They allow a fixed amount of water to be discharged, independent of water pressure or valve openings.

—*High-pressure, low-volume (HPLV) water sprayers* are a great way to reduce water used for cleaning while maintaining effectiveness.

—*Aerators on taps* can also reduce water flow.

—*Spring-loaded valves and clips on hoses and lines* will prevent water in the lines from draining out after the supply has been turned off, and ensure that operators only use what they need.

—*Foot-pedal spring valves* allow operators to use both hands in a water process while maintaining tight control of the water supply.

—*Smaller diameter pipes* can be used where less water is needed. Inspect your pipes regularly to prevent spills and leaks which may lead to hazardous waste disposal problems and equipment damage.

✓ **Treat wastewater.** Treatment of wastewater is often required prior to discharge into municipal sewer systems or state waters (see lead article). Because treatment makes wastewater less hazardous, it makes more wastewater available for recycling, which in turn can be a cost-saver.

Consider whether your treated wastewater might be of use to another facility. For example, a major dairy in Western Washington sends its wastewater, contaminated with small amounts of dairy products, to a nearby quarry where it is used for gravel washing.

Remember, wastewater can be an expensive liability. Decreasing your water use lowers costs and helps in the effort of water conservation. Reducing discharges and hazardous waste volumes protects the environment as well.

Waste Expo Nears

Northwest Waste Information Expo '91 comes to the Seattle International Trade Center on November 12 and 13. The expo offers "one-stop shopping" for learning how to reduce your wastes and costs, complying with hazardous waste regulations, and attracting customers by becoming an "environmental" business.



Some of the highlights of the expo include:

✓ hazardous waste "basics" program;

✓ over 80 exhibit booths of equipment and services;

✓ technical and industry-specific seminars on solid and hazardous waste management; and

✓ a spill response demonstration by the Auburn Fire Department.

Preregistration fees are \$25 for the first person from your organization (\$35 at the door) and \$15 for each additional person (\$20 at the door). For more information call (206) 728-1118.

In the Next Edition

The next edition of *Shoptalk*, Winter 1992, will contain a readers' survey. Ecology wants to know what you thought of the first year of *Shoptalk* and what changes and improvements we can make in 1992. So gather your thoughts and take advantage of the chance to make *Shoptalk* even more helpful.

Used Oil Filter Update

There are nearly 10 million used oil filters generated in Washington State each year, containing 650,000 gallons of used oil. Most of this waste stream ends up in our landfills and poses a pollution problem. For the last six months, Ecology has been investigating the issue of used oil filters, looking for a fair and environmentally protective solution to this waste management problem. Here is an update:

There is a lack of conclusive evidence.

After looking at available test results from around the country, Ecology has not found convincing evidence that used oil filters are hazardous. Some results indicate that drained filters may not be hazardous, while others indicate that crankcase oil may be hazardous most of the time. In all cases, it is difficult to test oily contaminated wastes. EPA may soon propose a change in the TCLP method that may make this testing easier.

Ecology must meet EPA's stringency.

In the spring of 1992, EPA will publish a final used oil rule that (in part) addresses used oil filters. Because Ecology implements the federal hazardous waste rules, our position on used oil filters must be at least as strong as EPA's final rule.

EPA's proposed used oil rule has just been published.

Published September 23, 1991, EPA is proposing a range of regulatory options for filters that include:

✓ listing used oil from automobiles as hazardous waste. This would perhaps make used oil filters hazardous, too;

✓ exempting used oil filters from the hazardous waste regulations if they are recycled;

✓ allowing drained and crushed filters to be disposed of in solid waste landfills.

For more information on the proposed rule, contact U.S. EPA, 401 M Street SW, Washington, DC, (202) 260-3516.

For now, drained used oil filters will not be regulated as hazardous.

Until EPA finalizes their used oil rule, generators should continue to manage used oil filters in accordance with the recommendations issued by Ecology six months ago. Generators have three options for disposing of used oil filters:

✓ **Recycle them.** Ecology recommends that people who generate oil filters recycle them. Filters that are recycled are currently exempt from state and federal hazardous waste requirements, including testing. More and more vendors are available for recycling filters. Call your nearest Ecology regional office for a list of such companies.

✓ **Send them to a hazardous waste facility.** Generators have the option of handling used filters as hazardous waste by sending them to a hazardous waste management facility in accordance with the regulations.

✓ **Take them to a landfill.** Used filters can be landfilled if they have been drained for 24 hours and you have approval from your local solid waste authority. Ecology recommends either crushing or puncturing filters for maximum drainage.

For more information on the status of used oil filters, request the new *used oil regulatory alert* from your nearest Ecology regional office.

Step by Step Compliance

Understanding the basics of how to comply with the hazardous waste regulations has just become easier. Ecology's new information packet, **Step by Step: Fact Sheets for Hazardous Waste Generators**, is now available for those who haven't already requested it. All hazardous waste generators will benefit from the 15 different pieces, plus some industries have their own specific fact sheets of basic hazardous waste do's and don'ts. Use the order form from the last issue of *Shoptalk*, or call your nearest Ecology regional office to request the packet.

Questions Wanted

Are the questions we currently answer on the back page of *Shoptalk* actually sent in by businesses like yours? Unfortunately, no, but we'd like to change that. Ecology requests that businesses send in their hazardous waste questions to *Shoptalk*. Take a minute to jot down your question on a postcard — chances are the answer will help other businesses that have the same question. Write to:

Editor, *Shoptalk*
Questions/Answers
Department of Ecology
Solid and Hazardous Waste Program
Mail Stop PV - 11
Olympia, WA 98504-8711

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.

Belleuve: (206) 649-7000
Tumwater: (206) 753-2353
Yakima: (509) 575-2490
Spokane: (509) 456-2926

Questions and Answers

Q I'm in the pesticide application business. Are the chemicals I use considered hazardous waste?

A While you're using a product in accordance with the label directions, it is not yet a waste. However, old, unusable or banned chemicals that you need to get rid of are typically hazardous wastes. If you need to get rid of such pesticides on a "one time" basis, call a hazardous waste specialist at your nearest Ecology regional office for assistance. Also, rinsewater from the cleaning of containers and spray equipment is potentially hazardous waste if it isn't properly managed. Empty containers and spray equipment should be triple-rinsed and the rinsewater applied for the product's intended purpose. Call your nearest Ecology regional office for a Pesticide Applicators Hazardous Waste Do's and Don'ts fact sheet.

Q I need information on who can test my waste and who can recycle it or dispose of it. Where do I look?

A Call your nearest Ecology regional office to request the **Hazardous Waste Services Directory** which lists businesses statewide that provide a wide range of hazardous waste services, including testing, recycling and disposal. (Remember, though, the list is *not* an endorsement by Ecology.)

Q Is it true that most hazardous wastes are "banned" from land disposal unless they meet specific treatment standards?

A Yes. As part of the federal Land Disposal Restrictions program, regulated businesses sending hazardous wastes off-site for treatment, storage or disposal must:

- ✓ know what the treatment standard is for their waste,
- ✓ sign a notification that states whether the waste meets or does not meet the standard, and
- ✓ make sure this notification is attached to the manifest when the waste leaves the site.

For more information, contact Chae Pak at EPA Region 10 in Seattle at (206) 553-5153 or the RCRA Hotline in Washington DC at 1-800-424-9346.

Q How can I or someone I know get on the mailing list for Shoptalk, or request back issues?

A To be added to the Shoptalk mailing list or to receive back issues, call the Solid and Hazardous Waste Program at (206) 459-6318 or write to the return address on this page, care of Shoptalk, and forward your name and mailing address. Four back issues are available.

Q If a waste hauler or a treatment, storage or disposal (TSD) facility has a State/EPA I.D. number, then they're approved by the state, right?

A Wrong. All an I.D. number tells you is that a company has notified Ecology that they're doing business — it says nothing about the way they manage wastes. Always ask waste haulers and TSDs what their compliance status is (has Ecology taken any legal action against them). Be sure to ask TSDs if they have interim status or a permit (they should have one or the other). You can call your nearest Ecology regional office to confirm this information.

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

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Solid and Hazardous Waste Program
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Olympia, WA 98504-8711

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