



1 Identify your waste and generator requirements

I didn't realize I could be generating hazardous waste!

True or False?

You're not alone! Many businesses, educational institutions and municipalities of all sizes generate hazardous waste on a regular basis but don't realize it. If hazardous wastes are **not** identified and managed according to state and federal regulations, the results could be employee injuries, environmental damage, and financial ruin for your business. This Checklist Fact Sheet will help you determine if you are a generator of hazardous waste subject to Washington's *Dangerous Waste Regulations* (Chapter 173-303 WAC).

This section highlights some common misconceptions about what is and is not a waste. In general, a waste is any material you intend to discard or burn (unless it's a fuel).

- It's not my waste because I lease/rent the parts cleaner and cleaning compound. The company supplying the original material or the recycler who returns a clean product to me is responsible for the waste.

FALSE. The generator of a hazardous waste is the person whose actions or business operations cause the clean material to become contaminated and unusable for its intended purpose.

- It's not my waste because someone else dumped it on my property or a previous owner or renter left the waste behind.
- FALSE. If the waste is on your property, you are responsible for ensuring that it is properly handled and disposed of. You cannot neglect it and expect someone else to handle the problem.*

- It really isn't a waste because I recycle the material on my premises with my own recycling equipment.

FALSE. The material has been rendered unusable until recycling makes it usable again. Unless you are using a hard piped, closed loop process, you must determine if the waste is hazardous prior to recycling. If it is hazardous, then handle it according to the regulations.

What do I need to do?

- ✓ Determine whether any of your wastes have been designated as "hazardous" wastes. Answer the questions in Part A of this Fact Sheet.
- ✓ Determine what your generator requirements are by calculating how much hazardous waste you generate per month and/or accumulate on the premises at any one time. Answer the questions in Part B of this Fact Sheet.

PART A:
Do you have hazardous wastes?

For each of your wastes, answer the questions in the left margin until you get a “yes” answer. A “yes” to any question means you have a hazardous waste. Examples of hazardous wastes in each category are provided in tables under each question.

Keep track of the following information for each of your wastes:

- **Dangerous Waste Number:** important for filing reports; there may be more than one number per waste,
- **Designation:** DW (Dangerous Waste) or EHW (Extremely Hazardous Waste), and
- **Quantity Exclusion Limit:** the QEL is used to determine the extent of your regulatory requirements, as you'll see in Part B of this Fact Sheet.

Is your waste on the Discarded Chemical Products List?

Examples

- Unused or unwanted products with one active ingredient that you plan to discard, such as acetone or xylene.
- Contaminated soil, water, or absorbent from the cleanup of a spill of one of these products.
- Many pesticide containers that haven’t been triple-rinsed.

Definition

Your waste is a hazardous, discarded chemical product if it is found on the list in the regulations (Chapter 173-303-9903 WAC) and you discard or intend to discard your waste.

Dangerous Waste Number, Designation, and QEL

- Dangerous Waste Numbers vary (see the table below for examples and the regulations for a complete list).
- Designation is DW.
- QEL is 220 pounds for numbers beginning with “U” or 2.2 pounds for numbers beginning with “P”¹.

Discarded Chemical Product Examples

Business (or Organization)

	Acetone	Arsenic pentoxide	Carbon tetrachloride	Chlordane	Formaldehyde	Methyl ethyl ketone	Methylene chloride	Methyl parathion	Perchloroethylene	1,1,1-Trichloroethylene	Trichloroethylene	Toluene	Xylene
Automotive Repair	✓		✓		✓				✓	✓	✓	✓	✓
Cleaning Agents and Cosmetics	✓				✓	✓			✓	✓	✓	✓	✓
Construction	✓				✓					✓	✓	✓	✓
Dry Cleaning								✓					
Educational and Vocational Shops	✓		✓		✓	✓			✓	✓	✓	✓	✓
Electroplating	✓		✓		✓	✓			✓	✓	✓	✓	✓
Formulators	✓	✓		✓	✓		✓	✓		✓	✓	✓	✓
Furniture/Wood Manufacturing and Refinishing	✓				✓	✓						✓	✓
Laboratories	✓		✓	✓	✓	✓						✓	✓
Pesticide Application		✓		✓			✓	✓		✓			
Printing and Graphic Arts						✓			✓	✓			

Dangerous Waste Number

U002 P011 U211 U036 U122 U159 U080 P071 U210 U226 U228 U220 U239

Is your waste on the Dangerous Waste Sources List?

Examples

- Spent solvents and still bottoms such as:
 - PERC (Perchloroethylene) dry cleaning solvent,
 - TCE (Trichloroethylene) used for parts/equipment cleaning,
 - Some waste inks from printing operations.
- Wastewater treatment sludges from electroplating operations.

Definition

Your waste is a listed dangerous waste source if it is found on the list in the regulations (Chapter 173-303-9904 WAC). "F listed" solvents (F001-5), as long as they make up less than 10 percent of the product before use, are not included as listed dangerous wastes.

Dangerous Waste Number, Designation, and QEL

- Dangerous Waste Numbers vary (see the table below for examples and the regulations for a complete list).
- Designation is DW.
- QEL is 220 pounds (or 2.2 pounds for numbers F020-F023, F026 or F027¹).

Business (or Organization)	Dangerous Waste Source Examples													
	Spent acetone	Spent carbon tetrachloride	Spent chlorinated fluorocarbons	Spent ethyl benzene	Ink formulation	Spent methyl ethyl ketone	Pentachlorophenol	Spent perchloroethylene	Spent 1,1,1-Trichloroethylene	Spent trichloroethylene	Spent toluene	Spent xylene	Spent wastewater sludge	
Automotive Repair	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	
Chemical Manufacturers	✓				✓	✓		✓	✓	✓	✓	✓	✓	
Cleaning Agents and Cosmetics						✓		✓		✓	✓	✓	✓	
Construction	✓	✓			✓	✓				✓	✓	✓	✓	
Dry Cleaning							✓							
Educational and Vocational Shops	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓	
Electroplating	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓	
Formulators	✓				✓	✓				✓	✓	✓	✓	
Funeral Services				✓										
Furniture/Wood Manufacturing and Refinishing	✓	✓			✓	✓					✓	✓	✓	
Laboratories	✓	✓	✓		✓	✓					✓	✓	✓	
Motor Freight Terminals		✓			✓			✓			✓	✓	✓	
Pesticide Application		✓					✓						✓	
Photofinishing									✓					
Printing and Graphic Arts		✓		✓	✓			✓	✓					
Wood Preserving							✓							
Dangerous Waste Number	F003	F001	F001	F003	K086	F005	F001, F002	K001	F001, F002	F001, F002	F001, F002	F001, F002	F005	F003

Is your waste ignitable?

Examples

- Waste solvents and still bottoms from the recovery of these solvents such as degreasers, paint thinners, and alcohols
- Unused paint
- Rags used with certain solvents
- Unused chemical products

Definition

Your waste is an **ignitable** hazardous waste if it is:

- a liquid with a flashpoint of less than 140.5 degrees Fahrenheit;
- not a liquid and is capable of causing a fire through friction, absorption of moisture, or spontaneous chemical changes;
- an ignitable compressed gas; or
- an oxidizer.

Dangerous Waste Number, Designation, and QEL

- Dangerous Waste Number is D001.
- Designation is DW.
- QEL is 220 pounds.

Ignitable Waste Examples

Business (or Organization)	Butyl alcohol	Ethyl alcohol	Ignitable alcohols	Ignitable degreasers	Ignitable enamel reducers	Isopropyl alcohol	Kerosene	Mineral spirits	Naphtha	Paints	Petroleum distillates	Stoddard solvent	White sprits
Automotive Repair		✓	✓	✓				✓	✓	✓	✓		✓
Chemical Manufacturers		✓					✓						✓
Cleaning Agents and Cosmetics		✓	✓		✓						✓		✓
Construction							✓	✓					
Dry Cleaning												✓	✓
Educational and Vocational Shops									✓	✓		✓	
Electroplating	✓			✓			✓						✓
Formulators		✓					✓		✓				
Furniture/Wood Manufacturing and Refinishing		✓					✓						✓
Laboratories		✓	✓				✓						
Motor Freight Terminals and RR Transportation				✓							✓		✓
Pesticide Application		✓					✓						
Printing and Graphic Arts		✓					✓						
Dangerous Waste Number	D001 for all ignitable wastes												

Is your waste corrosive?

Examples

- Rust removers
- Etching bath wastes from printing operations
- Electroplating solutions
- Sulfuric acid from spent lead acid batteries

Definition

Your waste is a corrosive hazardous waste if it is:

- aqueous (water-like) with a pH of less than or equal to 2.0 or greater than or equal to 12.5 (pH measures the acidity or alkalinity of a substance),
- a liquid that easily corrodes steel, or
- a solid which, when mixed with an equal weight of water, results in a solution with a pH of less than or equal to 2.0 or greater than or equal to 12.5.

(Solid corrosive wastes are "special" wastes that could possibly be taken to a solid waste landfill if certain requirements are met.)

Dangerous Waste Number, Designation and QEL

- Dangerous Waste Number is D002 if liquid or aqueous.
- Dangerous Waste Number is WSC2 if solid or semi-solid.
- Designation is DW.
- QEL is 220 pounds.

Corrosive Waste Examples

Business (or Organization)	Acetic acid	Ammonium hydroxide	Chromic acid	Hydrobromic acid	Hydrochloric acid	Hydrofluoric acid	Naval jelly	Nitric acid	Perchloric acid	Phosphoric acid	Potassium hydroxide	Sodium hydroxide (flake)	Sulfuric acid
Automotive Repair				✓		✓			✓	✓	✓	✓	✓
Chemical Manufacturers		✓	✓	✓	✓			✓	✓	✓	✓	✓	✓
Cleaning Agents and Cosmetics		✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Construction		✓		✓	✓	✓		✓	✓	✓	✓	✓	✓
Educational and Vocational Shops		✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Electroplating		✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Formulators		✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Laboratories	✓	✓						✓		✓	✓	✓	✓
Motor Freight Terminals and RR Transportation		✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Printing and Graphic Arts		✓	✓					✓	✓	✓	✓	✓	✓
Dangerous Waste Number	D002	D002	D002	D002	D002	D002	D002	D002	D002	D002	D002	WSC2	D002

Is your waste reactive?

Examples

- Ferricyanide bleaching wastes from photofinishing
- Waste inks containing cyanide
- Cyanide solutions used in electroplating
- Crystallized picric acid

Definition

Your waste is reactive hazardous waste if it:

- is normally unstable and readily undergoes violent change without detonating (the extremely rapid decomposition of an explosive material),
- reacts violently, forms potentially explosive mixtures, or generates toxic gases, vapors or fumes that pose a threat to human health when mixed with water, or
- is a cyanide or sulfide bearing waste.

Dangerous Waste Number, Designation, and QEL

- Dangerous Waste number is D003
- Designation is DW
- QEL is 220 pounds

Reactive Waste Examples

Business (or Organization)	Chromic acid Cyanides	Hypochlorites	Lithium batteries	Organic peroxides	Perchlorates	Permanganates	Potassium ferricyanide	Sulfides
Chemical Manufacturers	✓	✓	✓	✓	✓	✓	✓	✓
Electroplating	✓	✓	✓	✓	✓	✓	✓	✓
Formulators		✓	✓	✓	✓	✓	✓	✓
Laboratories	✓	✓	✓	✓	✓	✓	✓	✓
Photofinishing		✓						
Military Establishments			✓					
Dangerous Waste Number	D003 for all Reactive Wastes							

Is your waste hazardous under the Toxicity Characteristic Leaching Procedure (TCLP)?

Examples

- Rinsewater from the cleaning of application equipment used for TCLP pesticides
- Photoprocessing wastewaters containing silver and cadmium
- Lead dross from spent lead-acid batteries
- Printing ink sludges containing chromium or lead

Definition

Your waste is a **toxicity characteristic** hazardous waste if:

- the waste is tested by a qualified laboratory using the Toxicity Characteristic Leaching Procedure (TCLP), **and**
- one or more of 40 toxic constituents is found in the leachate, **and**
- the concentration of the toxic constituent is at or above the regulatory level for that constituent.

Dangerous Waste Number, Designation, and QEL

- Dangerous Waste Numbers are found in the Toxicity Characteristics List in the regulations (see the table below for examples and the regulations for a complete list).
- Designation is DW.
- QEL is 220 pounds.

Toxicity Characteristic Waste Examples

Business (or Organization)	Arsenic	Benzene	Cadmium	Chromium	Carbon tetrachloride	Chloroform	Creosol	Heptachlor	Lead	Mercury	Pentachlorophenol	Silver	2,4 D
Automotive Repair		✓	✓	✓				✓					
Chemical Manufacturers	✓	✓	✓	✓				✓	✓			✓	
Cleaning Agents and Cosmetics							✓						✓
Educational and Vocational Shops		✓	✓	✓	✓			✓					
Electroplating		✓	✓	✓	✓	✓		✓	✓			✓	
Formulators	✓	✓		✓	✓	✓		✓			✓		✓
Furniture/Wood Manufacturing and Refinishing		✓		✓	✓	✓	✓				✓		
Laboratories		✓		✓	✓	✓			✓				
Motor Freight Terminals and RR Transportation		✓		✓	✓	✓		✓					
Pesticide Application	✓	✓		✓	✓			✓					✓
Photofinishing			✓	✓				✓				✓	
Printing and Graphic Arts			✓	✓				✓					
Wood Preserving	✓						✓			✓			
Dangerous Waste Number	D004	D018	D006	D007	D019	D022	D026	D031	D008	D009	D037	D011	D017

Is your waste a criteria waste that is toxic or persistent?

Examples

- Epoxy resins
- Waste paint mixtures
- Used motor oil contaminated with solvent or carburetor cleaner
- Waste products with “poison” labels

Definition

Your waste mixture is a **criteria waste** if it hasn't been designated as hazardous waste under any of the earlier questions, and after testing by a qualified laboratory, or by your own knowledge, you find:

- it falls into a **toxic** category,
- it contains chemicals that are **persistent** in the environment.
(Solid, low-level toxic or persistent wastes are “special” wastes that could possibly be taken to a solid waste landfill if certain requirements are met.)

Dangerous Waste Number, Designation, and QEL

- Dangerous Waste Number is:
 - WT01 or WT02 for a **toxic** mixture;
 - WP01, WP02, or WP03 for a **persistent** mixture.
- Designation is DW, or EHW¹, depending on the concentration.
- QEL is 220 pounds, or 2.2 pounds for WT01.

Business (or Organization)		Mixture Waste Examples								
		Waste pesticide	Waste lab chemicals	Products labeled “poison”	Spent solvents	Contaminated motor oil	Paint booth washwater	Epoxy resins	Metal cutting oil	Oil with freon Isopropyl
Automotive Repair				✓	✓	✓	✓	✓		✓
Construction				✓	✓	✓	✓			
Educational and Vocational Shops		✓	✓	✓	✓	✓	✓	✓	✓	
Electroplating			✓			✓				
Furniture/Wood Manufacturing and Refinishing			✓	✓		✓	✓			
Laboratories and Hospitals		✓	✓							
Motor Freight Terminals and RR Transportation			✓	✓	✓	✓				
Pesticide Application	✓		✓			✓				
Dangerous Waste Number		WT01	WT01	WT01	WT01	WT02	WT02	WT02	WP02	WP02
		Toxic						Persistent		

Did you answer “no” to all the questions in Part A?

If so, the waste is probably not regulated as hazardous, but check with hazardous waste staff at the Department of Ecology to be absolutely sure. Hazardous waste transporters and operators of waste management facilities will often help their customers identify hazardous wastes. Your trade association may be another source of information. Because the Dangerous Waste Regulations are complex, we encourage you to ask for help in this very important first step of waste management.

PART B:
**What are your
generator
requirements?**

The more waste you generate or accumulate, the more regulatory requirements you must follow. Discover if you are a **“fully” regulated generator** (subject to most if not all generator requirements) or if you are a **small quantity generator** (subject to far fewer requirements) by answering all Part B questions below.

**Do you have any
wastes with a QEL of
220 pounds?**

↪ What is the total amount you generate per month of all wastes with a QEL of 220 pounds?

= _____

220 lb.= roughly



↪ What is the maximum amount on-site at any one time of all wastes with a QEL of 220 pounds?

= _____

If the total amount generated exceeds 220 pounds **or** the maximum amount on-site exceeds 2200 pounds, you do **not** qualify for the reduced set of requirements for small quantity generators. **You are a regulated generator.**

**Do you have any
wastes with a QEL of
2.2 pounds?**

↪ What is the total amount you generate per month of all wastes with a QEL of 2.2 pounds?

= _____

2.2 lb.= roughly



↪ What is the maximum amount on-site at any one time of all wastes with a QEL of 2.2 pounds?

= _____

If either of these totals exceed 2.2 pounds, you do **not** qualify for the reduced set of requirements for small quantity generators. **You are a regulated generator.**

What are your responsibilities?

Small Quantity Generator

- ✓ Identify your hazardous wastes and keep track of how much you generate or accumulate on the premises **each month**.
- ✓ Manage your waste in a way that does not pose a threat to human health or the environment.
- ✓ Ensure that your hazardous wastes are treated, recycled, or disposed of on the premises, or off-site (Checklist Fact Sheet 8) at a facility approved in your Local Moderate Risk Waste Plan, such as a:
 - permitted hazardous waste facility,
 - municipal or industrial solid waste facility, with local health department approval, or
 - legitimate recycler.Call your county's solid waste or planning department for details.
- ✓ If you have obtained a generator RCRA Site Identification Number (Checklist Fact Sheet 2), file an annual report with Ecology (Checklist Fact Sheet 3).

If you don't follow these four steps, you become subject to the requirements of a “fully” regulated generator (see below).

Regulated Generator

- ✓ Identify your hazardous wastes (this Checklist Fact Sheet)
- ✓ Obtain a RCRA Site identification number (Checklist Fact Sheet 2)
- ✓ Report annually (Checklist Fact Sheet 3)
- ✓ Perform preventive maintenance (Checklist Fact Sheet 4)
- ✓ Properly accumulate hazardous waste (Checklist Fact Sheet 5)
- ✓ Plan for emergencies (Checklist Fact Sheet 6)
- ✓ Use proper containers and manage them correctly (Checklist Fact Sheet 7)
- ✓ Arrange for proper transportation and disposal (Checklist Fact Sheet 8)
- ✓ Manifest shipments of hazardous waste (Checklist Fact Sheet 9)
- ✓ Keep records of hazardous waste activities (Checklist Fact Sheet 10)

Endnotes

¹Extremely Hazardous Waste (EHW) and Acute Hazardous Waste (AHW) pose a greater threat to human health and the environment than Dangerous Waste (DW). EHW is restricted from land disposal and may have a QEL of 2.2 pounds instead of 220 pounds. AHW also has a 2.2 pound QEL. Most businesses generate DW and not EHW, but pesticide applicators and generators discarding products with poison labels should pay special attention to this category. If you are not sure if your waste is DW or EHW, or you do not know if the QEL is 220 pounds or 2.2 pounds, call a hazardous waste specialist at your nearest Ecology regional office.

²If you know some of the components of your waste mixture and their concentrations, it is possible to determine if it is a hazardous waste without testing. Contact the nearest Ecology regional office for assistance.



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While this Fact Sheet summarizes the waste identification requirements of the *Dangerous Waste Regulations* (Chapter 173-303 WAC), it does not replace them. Always refer to the regulations themselves for more detail or call a hazardous waste specialist at your nearest Ecology regional office.

Spokane	(509) 329-3400
Lacey	(360) 407-6300
Bellevue	(425) 649-7000
Yakima	(509) 575-2490

This is Checklist Fact Sheet 1 in a series of 10.

If you have special accommodation needs or want more information, please contact the Hazardous Waste and Toxics Reduction Program at (360) 407-6700 (voice), dial 711, or call (800) 833-6388 (TTY).