

Shoptalk

Winter 1992
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A quarterly
publication
of the Solid and
Hazardous Waste
Program

Shoptalk Begins Second Year

Happy New Year! We are proud to bring a second year of *Shoptalk* to hazardous waste generators statewide. For over one year now, *Shoptalk* has been a tool that businesses can count on for understandable and up-to-date information about the hazardous waste regulations and waste reduction techniques. You have a better feel for who Ecology is, what we want from you and why we want it.

Since hazardous waste regulations were adopted by Washington state in 1978, more than 5000 generators have become part of the regulatory system, over 2000 in the last two years alone. With still thousands more waste-generating businesses in the state of all shapes and sizes, many more will be doing the right thing with their hazardous wastes in 1992.

We realize that businesses are faced with regulations from all sides, that hazardous waste regulations are complex and compete with other business concerns. But we have been asked by the

legislature and the citizens of Washington to do a job. We believe in that job, and more and more generators are beginning to acknowledge that the regulations exist for good reasons, that it makes sense to comply with them, and that one of the best ways to comply is to generate less waste in the first place.

Ecology wants to help protect your health and the environment. We want to level the playing field by making sure all businesses are playing by the same rules. We want to form a partnership with generators — with businesses and institutions recognizing the importance of the regulations and Ecology recognizing the concerns and frustrations of generators. We'd like to reach every hazardous waste gener-

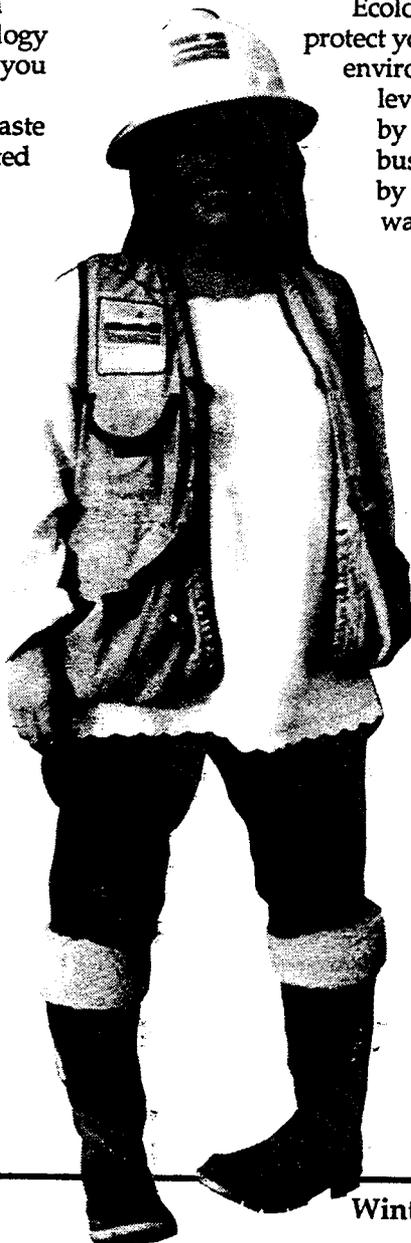
ator in the state, from pesticide applicators to auto shops, from parks to hospitals, from state agencies to public works departments. We're getting there.

In many ways it is *you*, the generators, who are making our efforts successful. You're asking questions, requesting information, attending workshops and trade fairs. You're telling us what you need to know to comply with the hazardous waste regulations so we can create products like the new *Step by Step* fact sheets for hazardous waste generators.

To help make *Shoptalk* even better, we need you to take the time to fill out the survey inside. It won't take very long, and your answers will go a long way toward helping us understand what your current hazardous waste needs are. Our New Year's resolution is to provide you with the help you need to do your part to comply with the regulations and information on ways to reduce your waste. We hope yours is to do your part to help make the environment a cleaner and safer one for everyone.

Darin Rice

Darin Rice,
Editor



*Hazardous
Waste
Inspector
Esperanza
"Pinky" Feria
of the
Tumwater
office prepares
for a day of
inspections.*

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Recycling Credits Save You Money

Most businesses know that recycling valuable spent material can save money on raw materials and reduce hazardous waste disposal costs. But, if you generate more than 2,640 lbs of hazardous waste per year, recycling can also save you money on hazardous waste planning fees.

The 1990 Hazardous Waste Reduction Act (HB 2390) set an ambitious goal of 50% statewide hazardous waste reduction by 1995 by requiring certain hazardous waste generators and hazardous substance users to prepare pollution prevention plans and pay hazardous waste planning fees (see Shoptalk Vol 1, No. 2). The goal is to encourage voluntary reduction whenever economically and technically practicable.

Businesses that generate more than 2,640 lbs. of hazardous waste per year (or about one half of a 55-gallon drum per month) and facilities required to report under SARA Title III, Section 313 must prepare plans. For the hazardous waste generators, Ecology uses the 2,640 lb. threshold to determine who plans, and to calculate the size of the planning fee. The fee is calculated based on the amount of dangerous and extremely hazardous waste reported to Ecology on the annual dangerous waste report (Form 4).

When Ecology reviews the Form 4 to determine who plans and the amount of your facility's fee, credits are given credit for on-site recycling. The amount recycled is subtracted from the total amount of hazardous waste generated per year. Therefore, you could potentially "fall out" of the planning requirements or be assessed a smaller fee by accurately reporting wastes that are recycled.

For example, if you generate 5,500 lbs. of hazardous waste per year and 3,500 lbs of it is recycled, your new hazardous waste planning threshold is 2,000 lbs.

Total Waste	5,500 lbs
Recycled Credit	<u>3,500 lbs</u>
Threshold lbs.	2,000 lbs

Now, with the new threshold of 2,000 lbs you would not be required to prepare a pollution prevention plan because it falls below Ecology's 2,640 lb. threshold.

In years past, Ecology could only track on-site recycling. But did you know that over 90% of Washington State's recycled waste is sent off-site for processing? To give you full credit for all your recycling efforts, Ecology has developed a new recycling credit form. To get credit for the waste you recycle on-site and off-site, fill out the FORM 4 and the newly attached recycling credit form.

Note: Recycling for the purpose of this act does not include burning for energy recovery. While burning for energy recovery may be preferable to disposal, burning for energy recovery does not count as recycling for fee calculation or planning purposes.

Remember, recycling credits only apply to the Hazardous Waste Reduction Act and do not apply to the Dangerous Waste Regulations.

To learn more about the new Recycling Credit Form call 1-800-874-2022

Recycling Events and Resources

✓ **April 19 Inland Northwest Waste Information Expo '92**, Spokane, WA, [phone number (509) 456-4478

These materials are available on loan from the Waste Reduction, Recycling and Litter Control Program Resource Center (206) 438-7585:

✓ **In Living Color: Painting Challenges for the '90s**

A national waste reduction teleconference for industrial painting; video (three tape set) or speaker's notes

✓ **Waste Reduction Guides** for dry cleaning, printing and photo-finish, Alaska Health Project

Ecology Offers Generator Workshops

Its time again for Ecology's Hazardous Waste Generator Workshops. Folks from Ecology invite you to attend a free workshop on hazardous waste reporting requirements. Learn what's new with hazardous waste and how to fill out your 1991 Annual Dangerous Waste Report. Meet and talk to Ecology staff from your regional office, and from the Hazardous Waste Information and Community Right-to-Know programs.

The four hour workshops will include discussions on a variety of topics, including the new Recycling Credit Form.

Due to limited space, we request you limit your attendance to two people per company. For reservations call the numbers listed below.

Spokane, January 22, 1992
(8:00 am to 12:00 noon)
Spokane Fair Grounds
Agriculture Center
North 222 Havana
(509) 456-2926

Pasco, January 23, 1992
(8:30 am to 12:30)
Columbian Basin Community
College, Room L-102
2600 North 20th Avenue
(509) 575-2490

Tacoma, January 29, 1992
(12:00 noon to 4:00 pm)
Tacoma City Council Chambers
Tacoma Municipal Building, 1st Flr.
747 Market Street
(206) 753-2353

Everett - January 30, 1992
(8:30 am to 12:30 pm)
Forest Park - Flora Hall
802 Mukilteo Boulevard
(206) 649-7000

Additional workshops are being given by Ecology's Southwest Regional Office at the following locations. Call (206) 753-2353 for information.
Port Townsend, February 6, 1992
Olympia, February 10, 1992
Hoquiam, February 11, 1992
Camas/Vancouver, February 12, 1992

What To Expect During An Inspection

If you've never been inspected by Ecology, the first time can be a little unnerving. People think they are in trouble or have committed a violation. Often the first reaction is defensiveness. "Are we in trouble?" or "What did we do wrong?" are common reactions to our presence.

Why Do We Do Inspections?

Waste that is mismanaged can have serious human and environmental health effects. Proper handling of hazardous waste reduces these hazards. Hazardous waste laws were passed on the impetus of tragic environmental disasters like Love Canal and Times Beach, where toxic wastes polluted the environment and threatened the health of nearby residents. They are designed to protect you, your children and future generations from similar problems in the future. They allow Ecology to evaluate how well businesses manage their waste.

Who Is Inspected?

Some inspections are initiated in response to complaints received by Ecology, but the most are routine compliance inspections of generators that have obtained an EPA/State Identification number.

What To Expect?

Even though inspectors may have different personal styles, they all share the goal of assisting you in managing your waste properly so that together we can protect human health and the environment.

Because businesses are unique in the products they produce, the wastes they generate and how they manage those wastes, all inspectors ask lots of questions. If an inspector uses language you don't understand, ask questions. Our goal is to assist you, and that can't be met if we don't speak the same language. Get clarification if you are not sure what is being asked or expected.

The Production Area

Questions often start in the production area: What does that machine do? What type of chemicals are used? Do you have any Material Safety Data Sheets (MSDS) for the chemical products that you use?

We will ask where you store your waste, who picks up your waste, and how often. If we see an area where waste is being mismanaged, we will advise you on how to correct the situation and why you are "out of compliance." For instance, if we see a 55 gallon drum on your property we will probably ask you what is in the drum. We will check to see if it is correctly labeled. If we observe any problems, we will inform you of the specific steps you need to take to correct the situation.

Paperwork

In addition to walking through your business and observing the physical processes, we will ask to review any documents related to the handling of dangerous waste. These documents include manifests, your Form 2, waste analysis profiles, and personnel training plans, contingency plans, land disposal restriction notification, etc. that are applicable. It's important for you to keep your records organized and accessible. The review of records is usually followed by a sitdown, where the inspector will discuss with you the violations (if any) observed and how to correct them.

Dual Role: Education and Enforcement

Inspectors have a dual job. We are as much educators as we are regulators. While it is our job to ensure compliance with the regulations, we are also at your business to provide you with education and technical assistance on interpreting and understanding the regulations. Get the most out an inspection and ask questions about the regulations that apply to your business, or call with your questions before we show up.

Finally, will you be fined or penalized for violations that we observe? Probably not. Fines and penalties are most often the result of serious violations or followup inspections where previous violations were not corrected; they rarely occur after the first Ecology visit. This does not mean that fines and penalties will never occur on the first inspection, it just isn't as likely.

Auto Repair Haz Waste Workshops Planned

Are you an automobile repair technician or mechanic? Would you like to know how to identify and safely handle hazardous waste or find out about safer alternative products?

The Washington Automotive Services Association is holding workshops in February and March.

The workshops are targeted at the people on the shop floor, people who use and dispose of hazardous substances on a daily basis.

Workshops are planned in Yakima (2/18), the Tri-Cities (2/19), Spokane (2/20), Vancouver (2/25), Tacoma (2/26), South Seattle (2/27), North Seattle (3/4) and Mt. Vernon (3/5). For more information, call the Association's Seattle office at (206) 581-0755.

The workshops are supported in part by a Public Participation Grant from Ecology, using funds from state taxes on hazardous substances.

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.

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

Questions and Answers

Q What do you mean by the term "generator status"?

A Generator status is usually one of three categories generators fall into depending on how much waste they generate — small quantity generator status for those that always produce less than 220 lbs. of hazardous waste per month, medium quantity generator status between 220 and 2200 lbs., and large quantity generator status for over 2200 lbs. per month.

Q Can the use of recycling credits on my annual report actually "lower" my generator status?

A No. While recycling credits may reduce your hazardous waste planning fees by allowing acquired on-site recycled waste amounts to be deducted from your annual report waste total, you cannot use this "revised" total to lower your generator status. The Form 4 must still include *all* waste generated or accumulated.

Q What's so important about becoming a small quantity generator instead of a medium or large quantity generator?

A The more waste you generate, the more legal responsibilities you have, and the more costs. For example, small quantity generators

need to follow only a few straightforward rules and are not required to have an emergency coordinator, a personnel training plan, a written contingency plan for emergencies, and a variety of other requirements that medium or large quantity generators need to follow.

Q I never generate more than 30 pounds of hazardous waste a month, but I've got two old, full 55-gallon drums of hazardous waste on-site. Do I need to get into the "system" or am I a small quantity generator?

A Because the two drums represent a regulated amount of hazardous waste (around 880 lbs.), you need to get into the system by filling out a Form 2 (call 206/459-6387). After receiving your State/EPA ID number, legally dispose or recycle the waste using a licensed waste hauler. If you do not generate over 220 pounds in a month or accumulate over 220 pounds at any one time you are a small quantity generator. When your generator status has changed from medium to small quantity generator and you wish to withdraw your ID number send in a Form 2, "Notification of Dangerous Waste Activities", indicating you wish to withdraw your ID number. Note: An annual report is required for any partial year your ID number is active.

Q I still don't understand what you mean by "hazardous waste". Isn't it just radioactive stuff from Hanford?

A No. Hazardous wastes can be products or other materials discarded by the average business that can harm human health and the environment. Some examples include used antifreeze, discarded pesticides, waste solvents, waste ink, spent plating bath solutions, and used photo finishing chemicals.

Q What is meant by the term "cradle to grave liability"?

A Cradle to grave liability means that financial and legal responsibility for a hazardous waste remains with the person or business who first generated that waste, from the time it becomes a waste until it is safely and legally disposed of.

Shoptalk

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

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Shoptalk Survey

We would like the readers of *Shoptalk* to let us know how well we're doing in getting out information about hazardous waste management.

Please take a few minutes to complete this survey, put a stamp on it, fold and tape it with the mailing address out, and return it to Ecology's Solid and Hazardous Waste Program. Feel free to make copies of the survey if more than one person in your company would like to respond.

The survey has four sections: Future *Shoptalk* subjects, *Shoptalk* readability, other educational tools, and the *Shoptalk* reader.

Section 1: Future *Shoptalk* topics

Of the hazardous waste topics listed below, which are the most *confusing*? Check up to ten items from numbers 1-41

- ✓ Identifying your waste
 - (1) ___ "listed" hazardous wastes
 - (2) ___ hazardous waste "characteristics"
 - (3) ___ "criteria" hazardous wastes
 - (4) ___ exempt wastes
 - (5) ___ the Toxicity Characteristic Leaching Procedure (TCLP)
- ✓ Finding your level of responsibility
 - (6) ___ small quantity generator (<220 lbs/month)
 - (7) ___ medium quantity generator (220-2200 lbs/month)
 - (8) ___ large quantity generator (>2200 lbs/month)
 - (9) ___ quantity exclusion limit (QEL)
- Getting into the "system"
 - (10) ___ EPA/State ID numbers
 - (11) ___ annual reports
- ✓ Managing your hazardous waste
 - (12) ___ on-site accumulation areas
 - (13) ___ on-site accumulation limits
 - (14) ___ on-site accumulation start dates
 - (15) ___ container management
 - (16) ___ labeling hazardous waste containers
 - (17) ___ incompatible wastes
- ✓ Being prepared for emergencies
 - (18) ___ preventive maintenance
 - (19) ___ arrangements with local authorities
 - (20) ___ emergency procedures
 - (21) ___ personnel training requirements
 - (22) ___ written contingency plans
- ✓ Transporting and disposing of hazardous waste
 - (23) ___ transportation requirements
 - (24) ___ manifests (shipping papers)
- ✓ Record keeping
 - (25) ___ what to keep
- ✓ Other regulations
 - (26) ___ discharging hazardous waste to the sewer (permit-by-rule)
 - (27) ___ SARA Title III "Community Right-to-Know", and Toxic Release Inventories
 - (28) ___ pollution prevention plans
 - (29) ___ land disposal restrictions
 - (30) ___ new hazardous waste legislation
- How to choose:
 - (31) ___ an environmental lab
 - (32) ___ an environmental consultant
 - (33) ___ a transporter
 - (34) ___ a storage facility
 - (35) ___ a treatment facility
 - (36) ___ a disposal facility
 - (37) ___ a recycler

- ✓ Waste reduction and recycling
 - (38) ___ general waste reduction and recycling
 - (39) ___ definition of waste reduction, recycling, reuse, reclamation
 - (40) ___ case studies
 - (41) ___ other (please specify)

Section 2: *Shoptalk* readability

- ✓ On a scale of 1 to 10, how valuable is the information presented in *Shoptalk*? (Circle a number)
 - (42) 1-----2-----3-----4-----5-----6-----7-----8-----9-----10
not valuable very valuable
- ✓ On a scale of 1 to 10, how understandable is the information presented in *Shoptalk*? (Circle a number)
 - (43) 1-----2-----3-----4-----5-----6-----7-----8-----9-----10
not understandable very understandable
- ✓ Rank the different sections of *Shoptalk*, 1, 2, 3, or 4 (1-best; 4-worst)
 - (44) ___ lead article
 - (45) ___ waste reduction and recycling
 - (46) ___ generator news articles
 - (47) ___ questions and answers

Section 3: Other educational tools

- ✓ Using the following scale, please rate each educational tool listed below for its value to you. Rate only those items you have actually used.
 - 1 = extremely valuable
 - 2 = valuable
 - 3 = somewhat valuable
 - 4 = not valuable
- (48) ___ industry-specific waste reduction and recycling fact sheets
- (49) ___ *Shoptalk*
- (50) ___ pollution prevention planning workshops
- (51) ___ annual waste reduction symposium
- (52) ___ on-site visits by regional waste reduction and recycling staff
- (53) ___ telephone conversations with regional waste reduction and recycling staff
- (54) ___ "Pollution Prevention Planning Guidance Manual"
- (55) ___ Pollution Prevention Networks
- (56) ___ Step-by-Step: fact sheets for hazardous waste generators
- (57) ___ Guide for Hazardous Waste Generators
- (58) ___ Ecology annual report workshops
- (59) ___ on-site visits from hazardous waste inspectors
- (60) ___ telephone conversations with regional hazardous waste staff
- (61) ___ Technical Information Memoranda

Section 4: The *Shoptalk* reader

Who at your company receives *Shoptalk*, and who reads it?

✓ Check all the answers that apply.

<u>Receives</u>	<u>Reads</u>	
(62) ___	(63) ___	CEO, President
(64) ___	(65) ___	Environmental/Safety Director
(66) ___	(67) ___	management
(68) ___	(69) ___	line workers
(70) ___	(71) ___	others: _____

✓ How do YOU usually use *Shoptalk*?

(72) ___ read it all
(73) ___ scan it for useful information
(74) ___ save it for later use
(75) ___ pass it along to others

✓ (76) ___ Are there any other ways we can make *Shoptalk* better?

✓ What category best describes you or your company?

(77) ___ hazardous waste generator:
(78) ___ drycleaning
(79) ___ auto repair and maintenance
(80) ___ printing, photo processing
(81) ___ petroleum refining
(82) ___ local, state or federal government agency
(83) ___ other (please specify)

(84) ___ hazardous waste treatment, storage, or disposal facility

(85) ___ local, state, or federal government agency (non-generator)

(86) ___ environmental activist

(87) ___ concerned citizen

(88) ___ environmental consultant

Please supply the following information about yourself so that we'll have a clear picture of our audience.

✓ Sex: (89) ___ male (90) ___ female

✓ Age: (91) ___ 18-25 (92) ___ 46-55
(93) ___ 26-35 (94) ___ 56-65
(95) ___ 36-45 (96) ___ 66+

✓ Highest level of education:

(97) ___ grade school (100) ___ college graduate
(98) ___ high school (101) ___ vocational-technical school
(99) ___ some college (102) ___ graduate school

Thank you for taking time to fill out and mail this survey. Your efforts will help us improve. Watch for a summary of the survey results in a future issue of *Shoptalk*.

Place
stamp
here

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