



Shoptalk

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publication
of the Solid and
Hazardous Waste
Program

Tracking Your Waste

Keeping records of how your hazardous wastes are handled is more than a paper chase... it is a requirement designed to protect you from future liability. When accusations are being made about an abandoned drum at the end of some logging road, or that a waste that you have been sending to the dump is actually regulated, you want to be able to say, "I have records to show that my hazardous wastes are handled correctly." Good records can help you avoid paying for "final" disposal a second time or for cleanup of a contaminated site, even penalties. The following tips will point you in the right direction:

Is Your Waste Hazardous?

Keep test results from analytical labs, on-site testing or records of any information about your waste which has been used to designate your wastes. Remember to redesignate when components or processes change.

How Much HW Was Generated?

Keep generation and accumulation records which tell when a waste was created and how long it has been accumulating. For example, when a waste first enters a container, put that day's date on it. You also need to record the dates and amounts of hazardous waste you recycle at your site.

What Are You Doing to Keep Your Site Safe?

Keep a log of the weekly inspections of your accumulation area. And be sure to put your emergency and contingency plans down on paper. Don't put off providing the training, making the contacts with emergency services and other items that you have planned.

What Happened to the HW After it Left Your Site?

Where did it go? Who took it? Did it really get to its final destination? Was it appropriate disposal for this waste? These are all questions that good records can answer. Keep the manifest forms, both the generators' copy you retain when the waste hauler picks up your waste and the copy that is signed and returned

from the facility that receives your waste. If the signed copy does not come back to you, do your best to find out what happened and send a manifest exception report to Ecology. (Be sure to keep your copy.) Also keep any Land Disposal Restriction certificates and notifications.

If you are a small quantity generator and not required to manifest your waste, be sure to keep all receipts and bills of lading and make sure they include adequate information about your waste and its disposition.

Are You Keeping Ecology Informed?

Keep copies of your notification form (Form 2), your annual reports (Form 4) and any other information regarding your waste that you provide Ecology or EPA.

How Long Should You Keep Records?

Forever! Although the law requires you to keep records for 5 years, it is wise to keep them for as long as possible. This information can be valuable when there are questions about the history of the site. (You want to be able to demonstrate that you are not responsible for a contamination problem.) It is also useful during real estate transactions.

Hulbert Pontiac-Cadillac is recognized in Olympia as a business which strives to protect the environment. Here, Steve Hulbert checks hazardous waste records.

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Recover, Reuse or Reclaim Refrigerants

Chlorofluorocarbons (CFCs) are chemically stable compounds used in motor vehicle air conditioning systems. If CFCs are vented, they drift slowly upward into the atmosphere destroying the ozone layer that protects us from ultraviolet radiation. It takes 75 to 150 years for CFCs to break down once they're released. Increased exposure to UV rays may cause skin cancer, cataracts, and damage to the immune system.

Historically, little has been done to reduce CFC losses from refrigeration and air conditioning systems. Virgin CFC was inexpensive, leaks were ignored and venting to the atmosphere was a common practice. Now we know better. CFCs must be captured and recycled!

CFC Release is Prohibited

Starting July 1, 1992, the federal Clean Air Act prohibited the release or disposal of refrigerants to the environment from appliances or industrial process refrigeration. These refrigerants can be recovered and re-used or reclaimed to new standards.

Requirements for Servicing Motor Vehicle Air Conditioners:

January 1, 1992

- ✓ Shops servicing more than 100 motor vehicle air conditioners per year must recycle CFC refrigerants.
- ✓ Technicians must be trained, certified, and use approved refrigerant recycling equipment.
- ✓ Technicians must complete an approved refrigerant recycling and certification course.
- ✓ Shops that serviced less than 100 motor vehicle air conditioners in 1990 are considered small shops. (To qualify for an extension, a shop must have informed EPA by January 1, 1992 that it qualifies as a small shop.)
- ✓ Recovery and recycling equipment must be approved by EPA.

November 15, 1992

Sales of small containers of refrigerant (less than 20 lbs.), can only be sold to certified technicians. *One proposal is that people buying small containers show proof of certification, and sellers maintain sales records.*

January 1, 1993

All service entities, including small shops, must certify to EPA:

- ✓ that they have acquired refrigerant recycling equipment;
- ✓ are properly using the refrigerant recycling equipment; and
- ✓ that only properly trained and certified technicians will operate the equipment.

New Developments

Information on CFCs is continually evolving. Alternative technologies and substitute refrigerants are being researched. These include alternatives for solvents, foam blowing, aerosols, pesticides, adhesives, and coatings. According to an EPA representative, additional information will be out before the end of the summer. We'll continue to keep you informed.

Recycling CFCs Made Easier

Chlorofluorocarbons (CFCs) are chemicals commonly used in refrigeration and air conditioning units. Although they are chemically stable, non-flammable, and non-corrosive they pose a serious threat to the environment because of their ability to destroy ozone in the upper atmosphere. Until recently, state hazardous waste regulations required generators of spent CFCs to follow hazardous waste designation, manifesting and transportation requirements.

Because of the importance of making sure CFCs get recycled, on May 19, 1992 Ecology put special exemptions in the Dangerous Waste Regulations for generators who collect and recycle CFC refrigerants. These exemptions are a result of an emergency rule. A permanent rule change will follow but is not expected to be substantially different from the emergency rule.

Under the emergency rule, regulated hazardous waste generators (those generating more than 220 lbs. of hazardous waste per month or required by Ecology to have an EPA/State ID number) are affected by the rule change. These businesses are required to keep certain records of the CFCs they

Help Is Available

CFC Vendor and Resource Lists

A vendor list that includes freon recovery equipment sources is available from the Department of Ecology by calling 1-800-RECYCLE.

CFC Technician Training Classes (HVAC)

- ✓ Tumwater - Refrigeration Services Engineers Society (RSES), (206) 754-4030. Contact Jennie or Vaughn Murphy.

RSES also offers CFC certification seminars. According to an EPA representative, this training will allow existing businesses to be "grandfathered" in to comply with the EPA requirements.

- ✓ Spokane - Inland N.W. HVAC Association, 1-800-786-3148.

Automotive Air Conditioning Training Classes

- ✓ National Institute for Automotive Service Excellence (ASE) Contact Dan Flanagan at (206) 325-2100 for information on testing programs.
- ✓ Northwest Air Conditioning. Call 1-800-733-1596.

generate but are not required to manifest and transport as hazardous waste the CFCs which are being reclaimed or recycled. CFCs not reclaimed or recycled must still be handled as hazardous waste. *Venting CFCs to the atmosphere is considered illegal disposal of a hazardous waste.*

Small quantity generators (those generating less than 220 lbs. of hazardous waste per month) are still required to recycle on-site or ensure the delivery of all hazardous waste to an authorized facility, such as a permitted disposal facility or a legitimate recycler and comply with any local requirements.

For more information on the conditional exemption for spent CFC refrigerants, contact your regional Ecology hazardous waste specialist at the number listed below.

Air Quality Permits on the Horizon

Generators of hazardous waste should be aware that recent changes in air pollution regulations will affect smaller commercial businesses as well as larger industries. The 1990 federal amendments to the Clean Air Act require all states to develop a renewable permitting program for sources of air pollution. The amendments add 189 toxics to the list of hazardous pollutants that will be regulated through the permits. These new requirements will include impact not only large industries and small businesses which emit toxic substances. Dry cleaners, electroplaters and printers are examples of some of the businesses expected to be permitted under the new regulation.

For more information on the draft rule, the upcoming changes in permit requirements, or public involvement opportunities, contact the Operating Permit Section of the Air Quality Program at (206) 438-8606.

EPA Makes Decision on Used Oil

With EPA's May 1, 1992 decision *NOT* to list used oil as hazardous waste or include used oil filters as hazardous, there will be little change in the way generators in Washington State should manage these wastes.

Used oil doesn't need to be handled as hazardous waste as long as:

- ✓ it is recycled (recycling includes burning for energy recovery), and
- ✓ it has not been mixed or contaminated with hazardous wastes (such as chlorinated solvents found in brake cleaner and carburetor cleaner).

Other wastes that can be managed like used oil include crude-based products like transmission fluid, hydraulic fluid, gear lube oils, metalworking oils, and differential fluid. These can be mixed together, but add nothing else along with these or you run the risk of contaminating a batch of used oil and turning it into a hazardous waste.

Used oil filters from cars and light duty trucks are exempt from state and federal hazardous waste management requirements (including testing). To be exempt, filters need to be handled in *one* of the following ways:

- ✓ puncture and drain (for 24 hours),
- ✓ or crush and collect oil,
- ✓ or dismantle and drain.

Generators of heavy duty filters and those plated with an alloy of tin and lead (terne-plated) need to determine whether those filters are hazardous or not.

Ecology strongly recommends that filters be recycled. Recycling prevents the release of waste oils into our landfills and allows the scrap metals to be reused. However, with permission from your local landfill, drained filters can be disposed of with regular garbage. For a list of companies that will recycle your used oil filters, contact your nearest Ecology regional office.

Changes for Shoptalk

A big "thank you" to all Shoptalk readers who took the time to return the Winter '92 survey. Some changes planned for the Fall issue are a result of your suggestions.

You requested more information on and examples of waste reduction and recycling of hazardous wastes. This will be possible with an expanded format. Debbie Van Scotter will be Associate Editor for a new "newsletter within a newsletter" which will provide this and other features.

You also requested stories about businesses which have had success in hazardous waste management. With the extra space available we hope to be able to include stories of this type on a regular basis.

But finally, the language of Shoptalk will not change. As you have requested, Shoptalk will continue to be a place where you can find out about hazardous waste management, reduction and recycling in a readable style.

If you read fine print, you may have noticed that Susan Nelson is now editor. Darin Rice, our founding editor has moved on to new challenges, one of which is the automotive shop sweeps which were featured in the Spring '92 issue. He will continue to contribute to Shoptalk.

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 should I do if some of my records are missing or I haven't maintained them in the past?

A If you know the names of the companies that took your waste, you should contact them to see if they have records that may be copied. If a past inspection by Ecology documented the existence of certain records, you should call the Ecology regional office for your area and ask to review your file. You can also request a copy of past Generator Annual Dangerous Waste reports (Form 4) from the HW Information Unit in Olympia by calling (206) 459-6387.

Q Can you give me some tips on how to count my hazardous wastes to determine if I'm over the 220 lb. small quantity generator limit?

A Yes.

First, add together the total of all hazardous wastes you generate *in a given month*. For example, you generate 50 lbs. of waste A in June and 50 lbs. of waste B in June for a total of 100 lbs.

Second, take this 100 lbs. and add to it the total of any other hazardous wastes you have *accumulated on site*; for example, the partially filled 55-gallon drum (110 lbs.) of waste that's in the back of your shop.

Third, add the totals and see if the number is greater than 220. In this case, 100 lbs. plus 110 lbs. equals 210 lbs., so you would remain under the small quantity generator limit. Remember, small quantity generators never generate more than 220 lbs. per month *and* never have more than 220 lbs. of hazardous waste on site.

Other tips:

Make sure it is a *waste* before you count it. For example, parts washer solvent isn't a waste until it is too dirty for further use or exchanged with a fresh tank from your waste hauler (whichever occurs first), and used antifreeze isn't a waste if it will be reused *as is*.

Make sure it needs to be counted. For example, shop rags that are laundered and meet minimum handling requirements do not need to be counted; neither does used oil that is not contaminated with a solvent or other hazardous waste and is recycled.

In general, wastes that you recycle on-site need to be counted toward your monthly total. If you recycle the same waste more than once during a month, the waste only needs to be counted once. However, all wastes generated by the recycling process need to be counted. For example: sludge and filters.

Q I'm hearing that HCFCs are safer than CFCs. Is this true?

A HCFCs (hydrochlorofluorocarbons) are variations of CFCs and are also used as refrigerants. Some HCFCs have been rated only 1/20 as destructive to ozone as their counterpart CFCs. They may be a safer alternative while the production and use of CFCs and HCFCs are phased out internationally. Check with your supplier for additional information on substituting HCFCs for CFCs. Spent HCFCs are subject to the emergency rule adopted by Ecology in May 1992 (see Shoptalk, page 2).

You should also ask about a new crop of refrigerants called HFCs. These contain no chlorine and from what we know, are less of a threat to the ozone layer than either HCFCs or CFCs.

Shoptalk

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

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