



Shoptalk

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A quarterly
publication for
hazardous waste
generators

New Rule Changes Waste Disposal Options

In January, Ecology amended the Dangerous Waste Regulations to allow certain categories of wastes to be discharged to municipal waste water treatment plants. This is known as the Domestic Sewage Exclusion.

Generators must meet stringent guidelines to qualify for this exclusion. In fact, it may not be the best way for you to dispose of your hazardous wastes. Instead, look for opportunities to prevent pollution at the source. Limit the use of hazardous materials to minimize the amount of hazardous waste generated by your business. This could eliminate your need for a discharge authorization or permit. Also, by reducing the toxicity

of waste sent to the sewer, you may increase the possibility of obtaining permission to discharge.

Why Did the Rule Change?

Local waste water treatment plants have the ability to treat some dangerous wastes so they no longer threaten human health and the environment.

What Wastes Can Be Discharged?

Under the new regulation, only wastes that are treatable and authorized can be discharged. Local sewage utilities may have different requirements for the type and quantity of wastes they can accept for disposal, so standards will vary. Many wastes will have to be treated before they are discharged to a municipal sewage treatment plant.

Who qualifies for the Exclusion?

The new rule applies only to generators who discharge to a municipal sewage treatment plant. Businesses with drains leading to septic tanks or storm drains may not discharge waste under this exclusion. If you don't know where

your drains lead, contact your local utility.

To qualify for the exclusion:

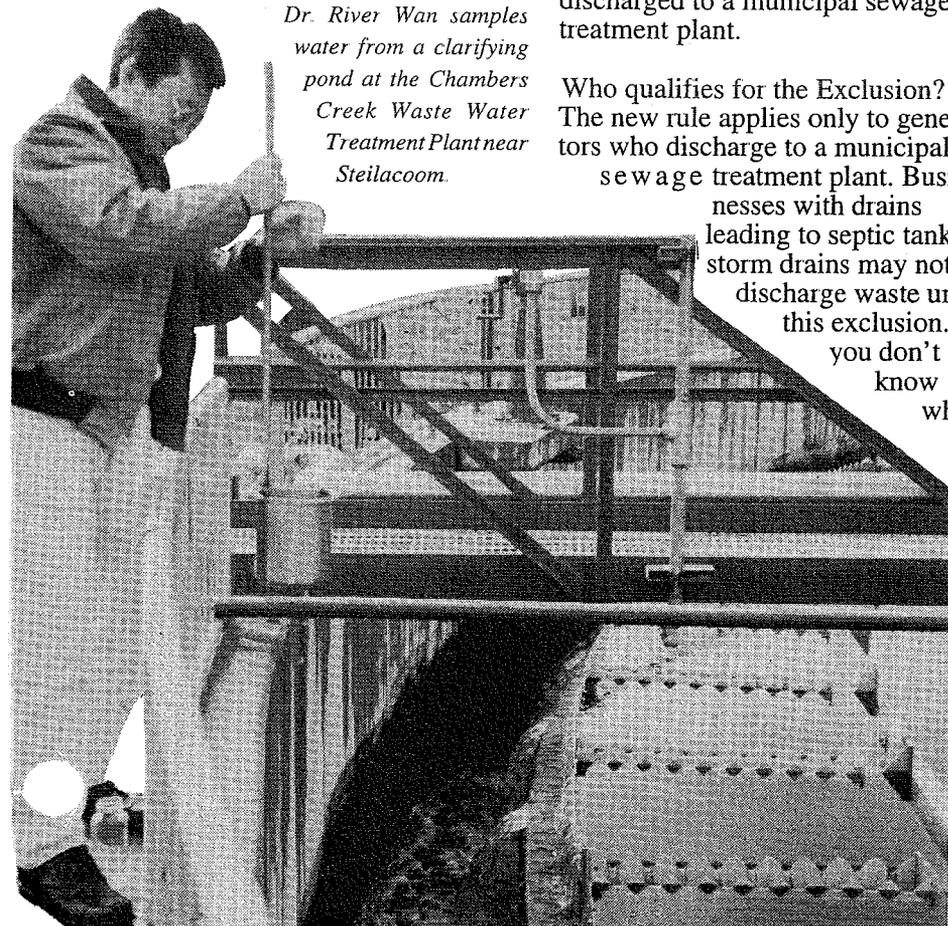
- ✓ Your facility must have a discharge permit from Ecology, or a pretreatment permit or authorization letter from a delegated pretreatment program.
- ✓ The waste must be described specifically, and named in the permit as authorized for discharge.
- ✓ The waste must be treatable in the local waste water treatment plant.
- ✓ The waste must not be prohibited for discharge under any pretreatment standards.

Everett, Lynnwood, Pierce County, Richland, Seattle/Metro, Spokane, Tacoma, and Vancouver currently have pretreatment programs and are able to issue permits. Generators who apply directly to these local sewage utilities will be issued pretreatment permits or authorizations to discharge if their waste can be accepted by the utility, and is shown to be treatable. Ecology's Water Quality Program may issue state waste discharge permits for businesses located outside of the areas with pretreatment programs.

Skip the Sewer

Not every generator will qualify for the exclusion. Ecology recommends that you decrease discharges by substituting less toxic products for hazardous materials. Then, find ways to reuse, recycle, or treat any remaining wastes or waste waters to make them non-hazardous.

Dr. River Wan samples water from a clarifying pond at the Chambers Creek Waste Water Treatment Plant near Steilacoom.



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What To Expect from a Compliance Inspection

What comes to mind when you hear the word "inspection"? Many generators get nervous when an Ecology staff person comes to their facility to conduct a compliance inspection. It is true that hazardous waste inspectors evaluate your facility according to the way it meets the laws outlined by the Dangerous Waste Regulations. But inspectors are also there to help you meet compliance standards, to make it easier for you to reduce risks to employees and the environment, and to offer positive feedback on what you are doing right.

Hazardous waste inspectors try to understand the difficulties and challenges of running a business. However, it's part of their job to make sure that threats to the water, air, soil, workers, and public health are avoided before they become accidents, environmental disasters or expensive cleanup operations.

You can always expect inspectors to be professional and courteous. They come to your place of business to provide information. Inspectors help by giving feedback on the steps you take to comply with the state and federal requirements for waste management.

The On - Site Inspection

Inspectors usually visit businesses without notifying you in advance. This helps them get a true picture of the waste management practices used at the facility. When an inspector shows up at your door, it may take two to three hours to complete the inspection. Large facilities or businesses with complex operations will take even longer.

Compliance inspections include four basic steps: an initial conference, a site tour, a records review, and an exit interview. During the initial conference, an inspector shows their Ecology identification to your business or environmental manager, and then explains the purpose and scope of the visit. The inspector will also describe what to expect from this visit, answer any questions, and quickly get to work.

The tour of your business involves looking at operations and identifying where wastes may be generated, accumulated, treated, recycled, or disposed. The inspector will take photographs, make notes, and may ask you for a sample of a particular waste.

Records are an important part of assuring that wastes are properly identified, classified and managed. The inspector will want to review your waste designation records, shipping manifests, notifications and annual reports. Depending upon how much hazardous waste your company generates or manages, the inspector may also want to look at internal inspection logs, spill and emergency response plans, and personnel training records.

At the end of the visit, the inspector will go over his or her observations. The inspector will also offer ideas to help solve any problems and answer your questions.

Back at the Office

The inspector prepares a report to document the inspection. A letter is then sent to you that summarizes any noted violations, and outlines information to explain specific problems. The inspector will also state what needs to be done, and will set deadlines for expected results.

You should feel free to call the inspector to ask questions about the inspection or to discuss difficulties with meeting deadlines. Ecology staff are willing to work with you as you make progress toward compliance.

Information collected or prepared by an inspector becomes part of the public record. You may review Ecology files for your company at any time at the appropriate regional office.

Possible Enforcement

Problems identified by inspectors may represent serious threats to human health and the environment. There are significant consequences if violations go uncorrected. Penalties and enforce-

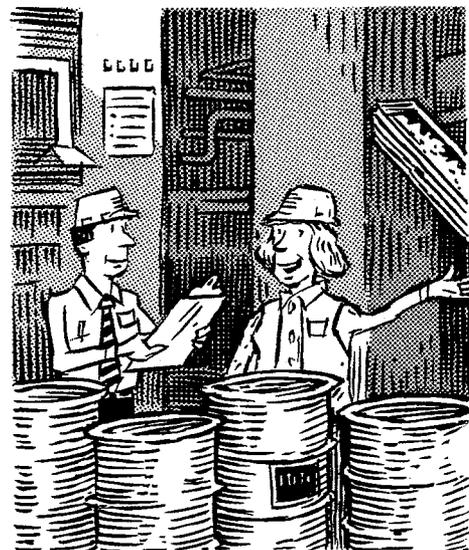
ment orders may be issued. Businesses typically are given opportunities to make corrections before an order or penalty is issued. Historically, fewer than five percent of all inspections actually result in formal enforcement actions.

Looking Ahead

Ecology staff are offering more assistance to small and medium quantity generators. These businesses typically do not have the budget to hire environmental managers, and yet need reliable information on pollution prevention and hazardous waste management. We are increasing the number of contacts with generators by:

- ✓ scheduling technical assistance visits to companies just entering the system
- ✓ conducting annual hazardous waste generator workshops
- ✓ providing group presentations
- ✓ coordinating joint assistance visits with toxics reduction specialists
- ✓ providing assistance to county Moderate Risk Waste specialists.

Hazardous waste specialists are available to help you. Call your nearest regional office with questions about the inspection process, or any other aspect of hazardous waste reduction and management.



Southwest WIN Expo '94

Don't miss the 1994 Southwest Waste Information Expo to be held May 9 and 10 at the Red Lion Hotel in Vancouver, WA. This year's event features 24 technical workshops and a trade show with the latest products and services in waste reduction, waste management, and recycling.

Registration is \$10 to attend the evening workshop on May 9, or \$25 for both the May 9 evening workshop and the daytime workshops on May 10. Register with Laura Schleyer at (206) 407-6355.

Bookshelf

These materials are available from Ecology. Call 1-800-633-7585 or (206) 407-6719

Technical Information Memorandum 82-5, Effective Date of the 90-Day Storage (Accumulation) Requirement (Revised 10/93)

This TIM clarifies issues related to the start of either the 90 day or the 180 day storage time requirement.

Waste Reduction for Vehicle Maintenance Shops (July, 1992)

This booklet offers guidelines for identifying waste reduction and recycling options for the automotive industry.

Leasing Equipment for Pollution Prevention (93-BR-04) This information sheet provides guidelines for leasing pollution prevention equipment, and includes a list of leasing companies.

Technical Information Memorandum 89-1, Counting Spent Solvents and the Closed Loop Exclusion This TIM outlines the reporting requirements for recycled spent solvents.

Dangerous Waste Regulations, Chapter 173-303 WAC This revision includes the rule amendments adopted in December, 1993.

Regulation of Dangerous Wastes Being Recycled (91-46, Revised February, 1994) This booklet clarifies those sections of the regulations pertaining to recycling.

Pollution Prevention Strategy: How to Choose a Vendor

How does your business protect the environment while maintaining or increasing economic growth? One way is to choose a vendor who will help you meet your pollution prevention goals.

This can be a challenge. You need to protect your company from potential liability and purchasing problems. New products and services continually change and increase the options for you to use in your company. Your job is to determine which products, processes, and services your company needs to be competitive in your trade, and to comply with the regulations. Ecology has put together a vendor data base that can help you find pollution prevention opportunities. Use the following guidelines to help you choose a vendor:

Before talking to a vendor, list all your needs and any questions that you might have about specific products, processes, or services. If you are not satisfied with the information a vendor provides, look elsewhere for someone who can show that they can meet the needs of your business.

Find out if the vendor uses alternative products or processes that eliminate, reduce, reuse, or recycle hazardous substances to minimize the amount of hazardous waste generated. Specifically ask if their products will designate as a federal hazardous or state dangerous waste after use. Research trade magazines for the best alternative products, processes, or equipment which will meet your present and future needs. Evaluate material safety data sheets (MSDS). Vendors must provide them at your request. Inspect labels to find products that do not contain dangerous chemicals. Look for products that will not jeopardize employee health.

Find out how long the company has been in business. Does the product or service have a proven track record? Can the vendor provide references? Check with your Better Business Bureau, trade association, or

the Office of the Attorney General to confirm that the company is reliable. Ask for a list of companies that use the same product and/or services for the same purpose. Ask the referenced companies if they are satisfied with the product and service performance, and if they have noted any problems.

Make sure the product is suitable for your use. Ask for a sample or demonstration in order to determine the effectiveness for your specific application. Confirm that you can return any unused product to the vendor if it does not suit your needs.

Verify that the vendor will provide operator training and a training manual for the equipment or product. This will help ensure that the employees assigned to work with the equipment or product have the skill to use it effectively, safely and correctly.

If you are researching a TSD or waste hauler, make sure the business is currently in compliance with the regulations and has a good compliance history. Contact a regional hazardous waste or toxics reduction specialist to determine if the company has any current or past violations. The vendor should also know this information. If the vendor has a history of compliance problems you may want to look for someone with a better compliance record. There may be liability, product, or service problems with the way they conduct business.

Many local government moderate risk waste coordinators have information on vendors in their area. A toxics reduction staff person at your nearest regional office can help you locate the resources you need to find a vendor to support your pollution prevention efforts.

Case Study: Auto Shop Built to Protect the Environment

Ed Cushman of C & H Foreign Auto in Spokane saw the construction of his new maintenance shop as an opportunity to reduce the amount of hazardous substances used by his business, to minimize the amount of hazardous waste generated in shop operations, and to protect his employees from exposure to hazardous materials.

Cushman originally planned to close off all of the shop's drains and go to a "dry shop". Cushman explains, "I woke up in the middle of the night thinking about eastern Washington's snowy winters, and wondered where all the water from the melting snow would go. I decided to install a system that would settle out dirt and separate out oil, grease and other waste particles before discharging to the local sewer."

C & H Foreign Auto's innovative system of controlling waste water includes a drain/sand trap system with three tanks. The tanks use gravity to settle out particles from the water. The new system also includes an oil skimmer. To keep his shop floor clean, Cushman purchased a large, automatic floor scrubber. The scrubber recycles all water used, and the dirt is collected and disposed of as solid waste. Cushman urges shop employees to reduce spillage. All material drained from vehicles is collected to keep the amount of waste on the floor to a minimum.

Cushman understands that source reduction is the key to reducing hazardous waste. He is testing a less hazardous solvent substitute to be used in the shop's parts washers. Parts are first cleaned in a spray cabinet parts washer unit. A mildly caustic detergent is added to the cleaning water. Then, the parts are cleaned in the solvent tank. A micro-membrane filter attached to the washer unit extends the life of the solvent by many months, decreasing the number of times the solvent needs to be replaced. Cushman is also testing a non-chlorinated carburetor cleaner.

Loans Available for Pollution Prevention

The Cascadia Revolving Loan Fund is a non-profit, community development loan fund that provides loans and technical assistance to entrepreneurs. This year it will provide up to eight loans ranging from \$5,000 to \$100,000 to help small businesses purchase equipment that will help prevent pollution.

Contact Patty Grossman or Terry Shapiro at (206) 447-9226 for more information

C & H Foreign Auto has sent used motor oil for off-site recycling for many years. Employees collect used oil in a 250-gallon above ground tank that is located inside the shop. Used antifreeze and brake fluid is collected separately, and also sent off-site for recycling.

"When I consider an alternative product or process, I look at the cost

of the new product or machine, worker safety, the effectiveness of the new equipment or cleaning agent, and whether or not hazardous waste will be generated," explained Cushman. He sees pollution prevention as the best way to maintain his small quantity generator status while his business continues to grow.

How to Report On-Site Recycling

Medium or large quantity generators, and small quantity generators with an EPA/State Identification Number, who recycle or reclaim solvents on-site through distillation or another method must report the amount recycled on the Form 4. Any residues from the recycling operation, such as filters, still bottoms or sludges that designate as a hazardous waste must also be reported. Refer to pages 16 and 17 of the Form 4 instruction booklet for an example of reporting on-site recycling.

For generators who recycle more often than once a month, the amount to be reported each month can be determined by following the method listed in Technical Information Memorandum 89-1, *Counting Spent Solvents and the Closed Loop Exclusion*:

- ✓ Determine the maximum stock of spent solvent that is recycled at least once that month.
- ✓ Determine the amount of solvent needed to make up the solvent lost to

evaporation, spills, or mishandling. ✓ Add the maximum stock and make up. Report this amount on your Form 4. Write "R" in the Status column.

In all cases, residues that are hazardous waste must be reported on a separate page when manifested, without an "R" in the Status column. Additional recycling by the receiving facility may be reported as a percentage equal to the amount reclaimed. Write the percentage in Column "K".

Hazardous material left in a distillation unit must be counted as hazardous waste, and is counted toward the total that determines generator status. The amount reported as recycled on-site will be credited the same way as off-site recycling when pollution prevention planning fees and waste thresholds are calculated.

Questions?
Call Holly Sullivan
at (206) 407-6733.



Make Weekly Inspections Work for You

Performing weekly hazardous waste inspections is one of the simplest ways you can protect your facility from a leak or spill, as well as meet new container regulations. If done correctly, your effort will prevent potential releases to the environment before they occur, ensure that wastes are identified properly, and see that wastes are shipped off-site before your accumulation time is up.

Many generators understand the value of these inspections, but may not know exactly what to look for and what to write in their inspection log.

Copy the sample inspection log printed below, or use it as a guide to help you develop a site-specific log for your facility.

Be aware that section -630 of the Dangerous Waste Regulations was just amended to include specific requirements for container inspection logs. Inspection logs must:

- ✓ show that inspections occurred at least weekly
- ✓ demonstrate that facility staff looked for leaking, deteriorating containers and containment

- ✓ include the date and time of the inspection
- ✓ note any observations, along with the date and nature of any repairs or remedial actions taken
- ✓ include the printed name and handwritten signature of the inspector. Inspection logs must be kept on file at the facility for at least five years.

The sample log meets all of the requirements listed above. It also includes additional checks for specific container management standards required by the Dangerous Waste Regulations.

Weekly Facility Inspection Checklist

Inspection for the week of _____

Accumulation

- _____ Are all drums and containers marked with a hazardous waste label?
- _____ Are all drums and containers marked with a risk label, if appropriate?
- _____ Are all drums marked with the accumulation start date?
- _____ Are there any drums that are near or have exceeded the 90/180 day timeframe?
- _____ Are all drums marked with the proper waste code(s)?
- _____ Are all containers closed?
- _____ Are all drum labels visible and readable?
- _____ Are all drums and containers in good condition?
- _____ Is there 30 inches of aisle space between rows of containers?
- _____ Are any drums leaking?

Sumps

- _____ Are sumps clean and free of contamination, spills, leaks, and standing water?

Safety Equipment

- _____ Are fire extinguishers charged?
- _____ Are spill kits stocked?
- _____ Is the first aid cabinet stocked?
- _____ Is the emergency shower and eye wash station functioning properly?
- _____ Are the emergency communication devices operating properly?
- _____ Is emergency response information posted near all communication devices?

Secondary Containment

- _____ Is the secondary containment free of cracks or other failures?

Comments:

Describe the actions that you took to correct the deficiencies noted above, and the date the actions were taken. _____

Printed Name _____ Signature _____
Date _____ Time _____

Q I have a letter of authorization from my local sewer utility that says I can discharge some of my hazardous waste to the municipal waste water treatment plant. Do I have to count this waste toward my generator status?

A Yes. Under the Domestic Sewage Exclusion, waste must be managed according to standards set by the Dangerous Waste Regulations until it enters the sanitary sewer system. All of the generator requirements such as proper designation of wastes, on-site accumulation standards, record keeping, counting and reporting still apply.

Q I own and operate two business located on opposite sides of town. Both businesses generate used oil. Since I am the owner and generator at both locations, can I bring the used oil from my east side shop to my west side location in order to burn the used oil in a space heater located there?

A Only "on-spec" used oil generated at your east side shop can be burned at the west side location. To be considered "on-spec", the amount of hazardous materials in the used oil cannot exceed any of the following levels: arsenic - 5 parts per million (ppm), cadmium - 2 ppm, chromium - 10 ppm, lead - 100 ppm, total halogens - 4000 ppm, PCBs - 2 ppm. The flash point must stay below 100°F. Call a hazardous waste specialist for more information.

Southwest Regional Office Moves

Ecology's Southwest Regional Office has moved to the St. Martin's College Campus in Lacey. To reach regional office staff at their new location:

By mail: Send correspondence to
P.O. BOX 47775
OLYMPIA, WA 98504-7775

By phone: contact regional office reception at (206) 407-6300 (Voice) or (206) 407-6305 (TDD)

By fax: dial (206) 407-6305

Emergency 24-Hour Spill Response
Number: (206) 407-6300.

Pollution Prevention: call Hugh O'Neill
at (206) 407-6339.

Hazardous Waste Compliance: call
(206) 407-6300 and ask for a hazardous
waste inspector. Identify the county
where your facility is located.

Hazardous Waste New Notifiers: call
Esperanza (Pinky) Feria at (206) 407-
6356.

Ecology Contacts

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 office and ask for a hazardous waste specialist. For information on reducing or recycling hazardous waste, ask for the toxics reduction staff, also at the following numbers:

Bellevue: (206) 649-7000

Lacey: (206) 407-6300

Yakima: (509) 575-2490

Spokane: (509) 456-2926

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Editor: Shirley Levig

Technical Editor: Chipper Hervieux

Contributors: Jan Brydsen, Tom Cusack, Camille Frensdorf, Bob Goldberg, Tamie Kellogg, Vern Meinz, Jim Sachet, Tim Schlender, Kay Seiler, Jeannie Summerhays

Distribution: Cathy Bouge (206) 407-6719

Washington State
Department of Ecology
Hazardous Waste and
Toxics Reduction Program
P.O. Box 47600
Olympia, WA 98504-7600



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