



Shoptalk

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A quarterly
publication for
hazardous waste
generators

Spokane Business & Industrial Park Environmental Program

At the Spokane Business and Industrial Park, owner Pentzer Development Corporation and 100 tenants work together to evaluate and address environmental issues. The Park is one of the largest in the country and has operated for thirty years. In 1992 Sarah Hubbard-Gray became the Park's environmental manager. Along with investigating possible historic environmental issues, she recognized the importance of working closely with the Park tenants. The tenants helped to identify and resolve existing environmental issues. For Hubbard-Gray, working with the tenants meant maintaining environmental compliance and preventing any future problems. She has developed a comprehensive environmental program that has won awards from the Association of Washington Businesses and the Washington Department of Ecology.

Pentzer Development Corp., through Hubbard-Gray's guidance, established a definitive approach with Park tenants regarding the attainment and maintenance of compliance with

environmental requirements. The major elements of this program are unique in detail and in the level of tenant support offered; they include:

Environmental requirements on the standard lease were expanded. New and existing tenants are screened to evaluate their environmental risk. Lower risk tenants must conduct an annual self audit and higher risk tenants must have annual third party audits conducted.

Clean Choice Network is the tenant outreach program which has included: informational meetings on environmental issues; an environmental newsletter; a "library" of regulatory and pollution prevention information; and limited environmental technical assistance.

Spill Prevention and Control programs were developed. A Park maintenance crew was trained and equipped with spill response kits. The Park has a first response capability to contain spills. Mobile Vehicle Wash System allows outdoor vehicle washing in compliance with water quality state waste discharge requirements.

Pentzer Development Corp. with the help of Sarah Hubbard-Gray, took a unique approach to manage historical environmental problems and prevent new ones. The traditional landlord-tenant relationship was modified to form a partnership for management of environmental issues.

Many businesses in the Park have increased recycling, reduced waste, and improved regulatory compliance. For example, Spokane Packaging modified its foam packing to eliminate a hazardous waste stream. They installed a new printing process which reduces wash water discharge by 80%, and are purchasing a filter system to remove color and pigment from wash water. Another tenant, Apex Industries, reduced the amount of hazardous waste generated, improved secondary containment of hazardous substances, and controlled equipment leakage.

Sarah Hubbard-Gray and Gordon Cudney of Apex Industries check an automatically closing funnel
Photo by Jan Brydsen.



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Toxics Release Inventory Reporting Changes:

Alternative Threshold Amount Added and Chemical List Expanded

The Toxic Chemical Release Inventory (TRI) list of chemicals has been expanded by 280 chemicals and 6 chemical categories. Over 600 chemicals and categories are now reportable under TRI. The additional chemicals must be reported on the 1995 Form R which is due on July 1, 1996.

TRI reporting requirements, under the federal Emergency Planning and Community Right-to-Know Act, apply to facilities that meet all of the following criteria:

1. Have 10 or more full-time employees;
2. Conduct manufacturing operations (Standard Industrial Classification Codes 20-39); and
3. Either manufacture or process 25,000 pounds or otherwise use 10,000 pounds of a listed chemical during the calendar year.

A majority of the chemicals added to the toxic chemical list are active ingredient pesticides. Currently, only the manufacturers of those chemicals would be covered under the reporting requirements.

Beginning the 1995 reporting year, an alternate reporting threshold has been established for facilities that release and/or transfer less than 500 pounds of a reportable chemical. Facilities that meet this criteria file an abbreviated form instead of Form R.

Other changes include: delisting of acetone, delisting of non-aerosol forms of sulfuric acid, delisting of ammonium sulfate (solution); and revising the listing for ammonia.

To request the publication, *Toxics Release Inventory: Reporting Modifications Beginning with 1995 Reporting Year*, or for more information about Form R and TRI, contact Idell Hansen at (360) 407-6727, the Hazardous Substance Information Office at 1-800-633-7585, or your Ecology regional office listed on page 6.

Dangerous Waste Regulations Will Be Changing

Ecology recently proposed changes to the Dangerous Waste Regulations. They are designed to help businesses manage hazardous wastes less expensively, while still protecting the environment. Public hearings were held during early July with comments received through July 21, 1995. Ecology will review all of the comments before the changes become final later this year.

Ecology director, Mary Riveland, expects several improvements from the new rules:

- ✓ It will be easier to identify dangerous waste since the rules remove overlapping testing requirements.
- ✓ Certain "special" wastes may be safely managed by disposal in state-of-the-art municipal landfills with less expense.
- ✓ Small businesses' waste management will be simplified.

Many businesses will be affected by the proposed changes, some are highlighted below:

Risk-based management standards

◦ **Special wastes** are a group of state-only dangerous wastes of relatively lower toxicity than many of the listed and characteristic wastes. If you have special wastes and you meet certain conditions for managing these wastes, then you may be eligible for the new *conditional exclusion*. The exclusion makes you subject to fewer dangerous waste management requirements.

◦ **Fish bioassay testing requirements** and the fish data for book designation have been updated. The stringency of the fish bioassay testing level will be reduced to make it comparable to rat bioassay. Some wastes now regulated as dangerous wastes will no longer be subject to the Dangerous Waste Regulations.

Simplified requirements

◦ **State toxicity designation** procedures will be simplified. A quantity exclusion limit of either 2.2 pounds for Extremely Hazardous Waste or 220 pounds dangerous waste replaces the complicated "Nevada graph" sliding scale (where toxicity is related to quantity of waste).

◦ **Carcinogens** will be regulated through the toxicity and persistence criteria. The separate "list" of carcinogens will be eliminated.

◦ **State-only solid corrosives** will have a separate waste code-WSC2. State and federal wastes will no longer have the same waste codes.

Consistency with the federal rule

◦ **F-listed wastes (F001-F005)** will be regulated at the ten percent federal regulatory threshold. However, solvent constituents at less than 10% concentration that present a hazard to the environment will still be regulated by the dangerous waste regulations through the toxicity or persistence criteria.

◦ Accumulation Limit Increases

Generators will now be able to accumulate up to 2200 pounds of dangerous waste and still maintain their small quantity generator (SQGs) status. This change should encourage small quantity generators to use facilities that recycle, treat, or dispose of dangerous waste. Storing larger volumes of waste will put SQGs in a better position to contract services for their waste and will make using commercial waste management services more cost effective.

To receive a copy of the preamble discussion that describes the changes in more detail, please call Bert Ponton at (360) 407-6752.

FREE PAPERS

These Ecology materials are available at no cost. To order call 1-800-633-7585 or (206) 407-6752

Best Management Practices Manual for Automobile Dealerships, #95-405A Auto wastes and containers

Best Management Practices Manual for Automobile Dealerships, #95-405B Waste processes

Sources of Treatability Data, #95-404 Used to find the treatability of hazardous waste under the Domestic Sewage Exclusion (WAC 173-303-071)

Washington State Agency Environmental Resource Guide, #95-409 A multi-Agency listing of staff with knowledge and expertise in pollution prevention.

Guidance on Dangerous Waste Annual Reporting for Medium Quantity and Large Quantity Generator Automotive-Related Shops, #95-415 Guide to help auto body, auto service, engine rebuilders, and radiator repair shops report common dangerous waste streams on the new 1995 Dangerous Waste Annual Report forms.

Hazardous Waste Planning Fee - 1995, #94-410 Fact sheet on the 1995 Hazardous Waste Planning Fee with details on who pays the fee and how the fee is assessed.

Dangerous Waste Regulation Amendments, #95-1251-HWTR Short Focus Sheet on proposed new rules to update the Dangerous Waste Regulations, Chapter 173-303 WAC.

Cost Analysis for Pollution Prevention, #95-400 Guide to help compare the total costs of a current process to the total costs of a pollution prevention alternative by using the net present value.

Regulation of Dangerous Wastes Being Recycled (#91-46, Revised February, 1994) This booklet clarifies those sections of the *Dangerous Waste Regulations* that pertain to recycling.

Recycling Dangerous Waste Can Reduce Generator Status

Recycling is becoming an increasingly important way to manage hazardous wastes. Recycling not only helps the environment, but can lower waste disposal costs, reduce the cost of raw materials, reduce liability, and enhance the public's image of a business.

In some cases, a company's generator status and regulatory burden may be reduced through recycling. This is because certain materials are not wastes if they can be directly reused.

- Examples of direct reuse include:
 - ✓ use as an ingredient in an industrial process to make a product
 - ✓ use as an effective substitute for a commercial product
 - ✓ returning the material to the original process from which it is generated. (The material must be returned as a substitute for raw materials.)

Direct reuse means that the material is reused on-site without first undergoing reclamation. Reclamation is defined as the processing of a material in order to recover useable products or to regenerate the material. *If a solvent used to rinse paint mixers is directly reused as an ingredient in the manufacture of paint and no filtering or distillation is required, then it is not a waste, and does not have to be counted.*

Reclamation of most materials means they must be counted before recycling, but there are some exceptions. These three types of materials are not counted as hazardous wastes when recycled after reclamation:

- ✓ unused commercial chemical products
- ✓ by-products that are characteristic or criteria wastes
- ✓ sludges that are characteristic or criteria wastes (includes wastewater and air pollution control sludges.)

☉ For details order booklet at left.

Pollution Prevention Reporting Made Easier

This year Ecology customized forms for reporting annual progress in pollution prevention. Each company's name, address, ID number and reported reduction goals were pre-printed on the **Annual Progress Report Forms**.

Customizing the forms saved money, made it easier for companies to respond, reduced Ecology's review time, and will improve the accuracy of Ecology database information.

✓ After completing the form, fold in half, tape shut and mail back to Ecology. The forms are self-mailing for the return trip.

Businesses required to prepare pollution prevention progress reports were sent the forms in late June, they are due on September 1. If you are unsure whether or not you must report pollution prevention progress or have any questions, please call a toxics reduction staff person at your Ecology Regional Office listed on page 6.

Conference On International Environmental Standards

The International Organization for Standardization will hold a fall conference about their development of an environmental management standard to create a cleaner, safer, healthier world by encouraging the market to drive environmental stewardship.

The new standard will consider both the nature of environmental management at a company and the environmental aspects of its products. The Washington State Department of Ecology, the U.S. Environmental Protection Agency and the Northwest Pollution Prevention Research Center are co-sponsors of the conference scheduled for Nov. 6 and 7, in Bellevue.

To get on the mailing list for a conference application, call (800) 633-7585 in Washington, or (360) 407-6893 from out-of-state.

Case Study: Midway Cleaners

Midway Cleaners in Kent is a dry cleaning establishment with an eye to the future. Owner Michael Park was one of the first to take advantage of a Cascadia Revolving Fund loan to finance pollution prevention improvements.

The loan paid for a closed unit dry cleaning machine. This machine reduces his use of perchloroethylene (perc), a hazardous degreasing solvent used to clean clothes. Park expects to see a drop in the amount of perc used from 450 gallons a year to about 70 gallons a year. He'll save big on purchasing and disposal costs.

Governor's Award for Outstanding Achievement in Pollution Prevention

The 1995 award winners were announced this spring. Recipients are distinguished by their significant accomplishments in reducing pollutants at the source, and by leadership in their industry and in their community. The winners are: **Earthguard**, an environmentally sensitive yardlife system, Redmond **K2 Corporation**, a ski manufacturing facility, Vashon **Naval Undersea Warfare Center**, Division Keyport

Governor's Award for Continued Excellence in Pollution Prevention

Previously recognized through this award program, recipients have continued to demonstrate excellence and leadership:

The Boeing Corporation, Seattle **Cascade Pest Control**, structural pest control services, Bellevue

Honorable Mentions

Fat City German Car, Inc., auto repair and service, Seattle **Bemis Company, Inc.**, flexible packaging manufacturer, Vancouver **Circuit Technologies, Inc.**, manufacturer of printed circuit boards, Redmond

Washington Army National Guard, Tacoma

U.S. Army Corps of Engineers, Granite Goose Project, Pomeroy

Pollution Prevention Loan \$\$ Available

Do you have a business that could benefit from pollution prevention strategies? If you have good ideas, but little money to invest, there's a great new loan program for waste reduction activities.

The Cascadia Revolving Fund in Seattle has loan money available. The Cascadia Pollution Prevention lending project can provide both financing and technical assistance to small businesses. Cascadia will lend to qualified businesses unable to obtain bank loans because they have insufficient equity, limited cash flow; or banks chose not to lend to them because small loans aren't profitable. Collateral is required, and it takes about three months for loan approval. Interest rates range vary.

Cascadia wants to provide businesses with a chance for survival and growth. For pollution prevention loan information call Josh Drake at (206) 447-9226.

Innovative Settlements in Enforcement Actions

In an effort to work together with industry to resolve environmental compliance issues, Ecology has promoted innovative settlement agreements with businesses cited for not complying with the regulations. The goals are to:

- ✓ encourage compliance through cooperative problem solving;
- ✓ promote efficient commitment of private and state resources; &
- ✓ develop a cooperative working relationship between industry and Ecology.

This type of settlement agreement has been quite successful in improving both the effectiveness of compliance and Ecology's relationship with industry. Generally, these agreements involve a reduction in monetary penalties destined for the State General Fund, the dedication of company resources to improving environmental compliance, and a commitment by the affected business to accomplish specific goals within a limited amount of time.

In 1993, Ershigs, Inc., a Bellingham manufacturer of corrosion resistant equipment, entered into such an agreement with Ecology. The terms of the agreement combined the reduction of the original financial assessments with a requirement that Ershigs, Inc. perform these tasks

over a two-year period:

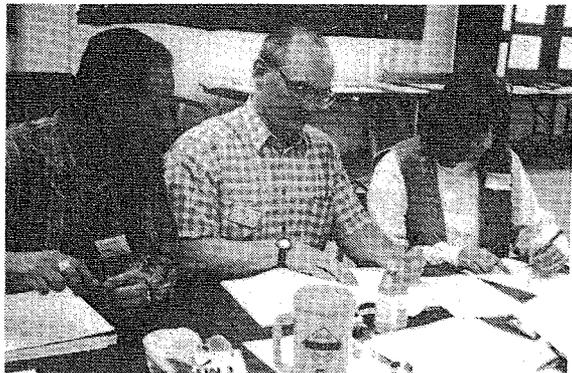
- ✓ Compile and publish information concerning Ershigs' experience with various alternatives to the use of acetone. Plus, publish eight environmental newsletters.
- ✓ Sponsor three forums on hazardous waste management and pollution prevention planning.
- ✓ Institute an enhanced training, inspection, and compliance program.

By following the settlement, Ershigs' investment in environmental compliance resulted in benefits to Washington's fiberglass industry as well as to its own operations.

Ershigs and Ecology agreed that communication was the key to success. A project coordinator from each settlement participant had the responsibility to ensure completion of the terms in the agreement. Dave Misko (Ecology) and Jeff Benz (Ershigs) worked closely on the requirements and their timely completion. Their efforts were instrumental to the overall success of the agreement.

Businesses wanting to enter into this type of settlement with Ecology must have a high level of commitment. Both project coordinators agree that by working together, Ecology and Ershigs came up with a better solution and resolution than either would have achieved separately.

Hazardous Waste Generator Workshops: Where Generators Learn



Above: A group of this year's 350 workshop participants solve problems together.

Guidance on Dangerous Waste Annual Reporting for Automotive Related Shops
Automotive related shops may be interested in Ecology's special guidance document to help them in filling out the revised Dangerous Waste Annual Report. This information will be useful to auto body, auto service, engine rebuilder and radiator repair shops. The guidance explains reporting requirements for auto shops in the medium and large quantity generator categories.

The guidance identifies many of the most common waste streams generated by automotive businesses. For selected wastes, the guidance shows how to answer the questions on the Generation and Management Form, which replaces the old Form 4. It also identifies certain wastes which are conditionally exempt from reporting if shop owners follow best management practices.

This guidance simplifies and streamlines completion of the new 1995 Annual Report. The new forms are for reporting dangerous waste generation and management activities conducted during 1995. Completed forms are due on March 1, 1996. To request a copy of *Guidance on Dangerous Waste Annual Reporting for Medium and Large Quantity Generator Automotive Related Shops*, call 1-800-874-2022, or your Ecology regional office listed on page 6.

For the past several years Ecology has been helping generators understand the basic hazardous waste requirements by conducting annual hazardous waste workshops.

Not Just Lectures

This Spring there were 350 workshop participants. They came prepared to participate. These weren't "sit back and listen" workshops, but interactive. Participants worked in small groups to discuss hazardous waste management issues. Participants said that the small group approach increased how much they learned about the regulations and helped to build networks of businesses facing and solving similar challenges.

Workshops were described as well run, clear and valuable. Participants met Ecology staff, and had their questions answered.



Above: Ecology's Pinky Feria assists Asha Mhatra of City of Olympia LOTT at a workshop in Lacey.

Increased Generator Contact Pilot Project
Hazardous Waste and Toxics Reduction staff at Ecology's Central Regional Office in Yakima are working on a voluntary compliance project to visit all regional hazardous waste generators in one year.

Staff make the announced visits to provide technical assistance; the visits are not enforcement related. Staff do not leave the generator's facility with any written record of the visit, except to keep track of who was visited. The visits focus on providing solutions to compliance problems through a "to do" list, providing vendor information, identifying pollution prevention opportunities, providing hotline information and a "who to call list". Compliance topics include labeling, storage, waste codes, paperwork, and waste stream identification.

The first visits were made in late 1994 in Okanogan County after Ecology coordinated with the Okanogan Environmental Concerns Committee. The committee helped develop and evaluate the approach, it has members from the major industries of Okanogan County (agriculture, wood products, local government, small business.)

This pilot project will be examined to see if Ecology and the business community find it successful. Each generator visited receives an evaluation form to anonymously return.

Respondents thus far feel that the purpose of the visits was clear. They had a chance to discuss concerns and issues with staff and to receive useful information. The visits made respondents: more comfortable with Ecology, better able to understand the dangerous waste regulations, and more likely to look into waste reduction techniques.

Respondents' comments included:

"I feel you are on the right track, it encourages the user to get involved with your people, not hide from them."

"The person who came here was informative and had great suggestions on how to reduce waste and save money."

"We appreciated their visit and their attitude. We, like most businesses I think, are very willing to comply when it is pointed out to us those things that we were not doing right."

For more information, please call Brian Dick in Yakima, (509) 575-2477.

Readers Report Views in *Shoptalk* Phone Survey

This spring a randomly selected sample of *Shoptalk* subscribers gave us their opinions in a telephone survey. According to the responses, Ecology is providing useful services in a courteous way people say they appreciate. Here are some of the survey results:

Newsletter

Shoptalk readers all said the newsletter is easy to understand and most said it has the information they want and need. Sections respondents liked best were: announcements; waste reduction & recycling; and annual reporting requirements. Several respondents were surprised that publications listed on the Bookshelf section are FREE and prepared especially to help generators. The section was renamed "Free Papers" to clarify its purpose. There were many suggestions for future article topics - look for them in future issues. Several respondents requested an industry-specific automotive issue, so we are considering writing one.

Staff and Services

Respondents who had been visited by Ecology staff said the visits were useful or very useful (96%.) Those who had attended workshops gave them a big thumbs up, with 93% describing them as useful. When respondents called Ecology for help, they say they got

it! Ninety-five percent of respondents said telephone help was useful. Guidance manuals and publications also got high marks, with 83% ranking them as helpful. We used a suggestion for adding pre-printed labels to mailings.

Many respondents remembered Ecology staff who had offered exceptional help. Staff were described as "very helpful", "polite", "friendly", with an "improved attitude", "consistently excellent assistance" and "brilliant pollution prevention ideas".

Follow-up

Survey results, which were circulated to all staff, will be used to increase services respondents found useful and to evaluate suggestions. Thank you to those who agreed to be interviewed. Special thanks to Senior Environmental Corps volunteers Harry Johnson, Victor Hill and Raymond Price who helped conduct the survey. To express your views on this topic please call Bonnie Meyer at (360) 407-6740.

Growth and the Pacific Northwest Environment is the theme of the Pacific Northwest International Section of the Air and Waste Management Association (PNWIS) annual meeting, coming to Spokane November 15, 16 and 17. For details about this year's meeting, call (509) 456-4727, extension 117.

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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If you have special accommodation needs or require this document in alternative format, please contact Dave DuBreuil at (206) 407-6721 (Voice) or (206) 407-6006 (TDD).

Shoptalk

Shoptalk is produced quarterly by the Hazardous Waste and Toxics Reduction Program, Washington State Department of Ecology (206) 407-6740

Editor: *Bonnie Lynn Meyer*

Technical Editor: *Chipper Hervieux*

Contributors: *Christa Boedigheimer, Jan Brydsen, Brian Dick, Josh Drake (CRF), Pinky Feria, Idell Hansen, Lynn Helbrecht, Judy Kennedy, Dave Misko, Joanne Phillipson.*

Distribution/Mailing List Changes: *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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