



Autumn 1995
Vol. 5, No. 3

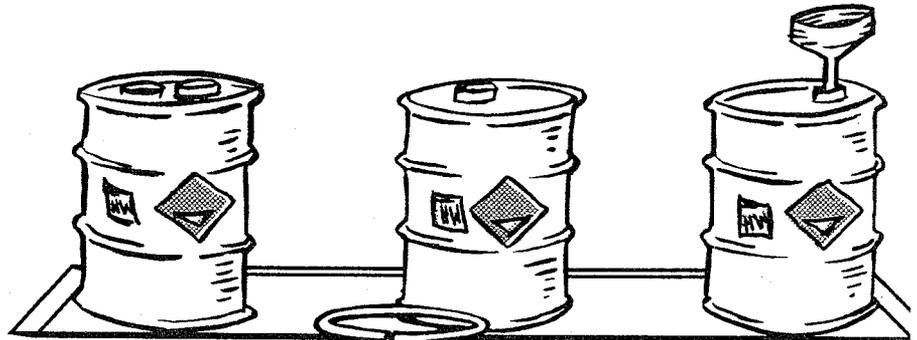
Shoptalk

A quarterly publication for hazardous waste generators

Table of Contents:

EPA Air Emissions	
Reg. Changes	2
Oil Recycling Pays Off	2
Free Info	3
Green Lights	3
Tips for Painters	3
Case Study <i>Parker Paint</i>	4
Hazardous Waste Generator Workshops	5
Questions & Answers	6

Find and Fix the Flaws



A.

B.

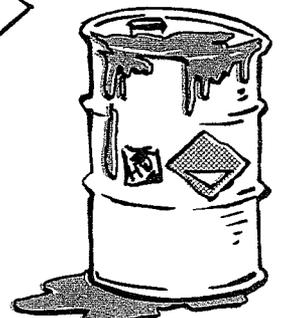
C.



D.



E.



F.

Be a Drum Detective

When an Ecology inspector looks at your hazardous waste storage area, do you know if your storage methods will be something you can be proud of? Do you know the most common types of 55 gallon barrel storage problems? Barrels are excellent for storing wastes, but Ecology inspectors often find them in an unsafe condition. Every barrel at your business must conform with some important rules *Take the barrel test* and check your answers to the ones below.

If you were able to see a solution to the sorry state these drums at right were stored, then you are already on your way to having a safe storage strategy.

If you get all six right, congratulations on your hazardous waste management savvy. If you don't, then review the answers. Make sure you have no bad barrels at your business. When containers are labeled correctly, with start dates and contents, hazardous waste management goes smoothly. For assistance please call your Ecology regional office listed on page 6.

Answers:

- A) **Bung is out.** Always tighten down bung after opening.
- B) **Ring Seal is off.** The ring-seal must be tightly in place after opening.
- C) **Funnel is sticking out of opening.** Always remove funnel and replace bung after use.
- D) **Mixed wastes and no secondary containment.** Separate different types of wastes, mixing means fewer recycling or reuse opportunities. Your secondary containment is a backup system to avoid releases of hazardous materials into the environment.
- E) **No Smoking areas** must be strictly enforced around dangerous wastes. Dangerous wastes are DANGEROUS, this waste is labeled as flammable so cigarettes in this area are a real hazard.
- F) **Leaking containers** like this indicate long term carelessness. Cleanup spills promptly and check often for leaks.

Oil Recycling Efforts Pay Off

Many businesses are helping to keep our state clean and save energy by recycling oil. Oil recycling has become so much a part of the way we do business we don't often think about the great benefits the activity has for all of us.

✓ For every gallon of used oil refined you can get 2.5 quarts of lubricating oil. Compare this to the 42 gallons of crude oil needed to make the same 2.5 quarts of lubricating oil.

✓ When used oil is made into clean new oil it takes three times less energy compared to refining crude oil.

✓ By recycling used motor oil we keep it out of the environment. Oil may have toxic metals in it such as, lead, cadmium, arsenic, and chromium.

✓ Shops which cannot recycle their used oil are using it in clean burning, EPA approved, used oil heaters.

Education Fee

Ecology has changed the way it collects the Hazardous Waste Education Fee. The 35\$ fee is assessed to *hazardous waste generators*, defined as persons who generate some quantity of waste. Any facility that generated no waste during the billing period can go through a certification process and the fee will be waived.

The fee is now collected by Ecology. The fee was due June 30. Delinquent fee payers had until September 30 to send in their fees. If you missed this deadline send in your fee right away.

Fees are used to provide technical assistance and compliance education on hazardous waste management and pollution prevention. Ecology provides some assistance directly and also helps fund county programs that help small businesses. They develop written materials, hold workshops, provide advice and consultation services and hold special waste collections.

EPA Air Emission Rules May Affect Large Quantity Generators

If your business generates organic wastes, such as used solvents, then you may be affected by new air emissions rules adopted by the United States Environmental Protection Agency (EPA) under the Resource Conservation and Recovery Act (RCRA). The new rules affect how federally recognized large quantity generators, and hazardous waste management facilities, manage their organic wastes in tanks, containers, and surface impoundments. The new management standards are intended to significantly reduce the amount of organic emissions that escape these units.

EPA has also made changes to require large quantity generators to comply with standards to reduce emissions from process vents (such as those associated with solvent distillation operations) and equipment leaks. Previously, these RCRA air emission rules applied only to hazardous waste treatment, storage and disposal facilities.

If your business is a large quantity generator with organic wastes, such as used solvents, and you accumulate, recycle, or treat the waste, then the air emissions rules are likely to apply.

For further information about the rule itself or to receive a fact sheet, please contact the RCRA hotline, at 1-800-424-9346.

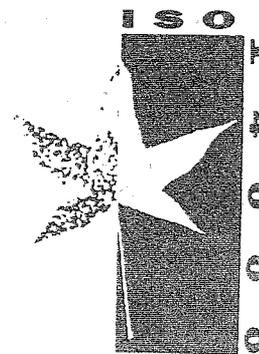
NW WIN EXPO

This year come to the seventh annual Northwest Waste Information Expo. Network and find out about new technologies and advances in waste management and pollution prevention.

The event will be held October 17 - 18, 1995, in Bellevue. Call Greg Elkerton at (206) 467-9682 for more information.

Your Comments on Dangerous Waste Rule Amendment Now Under Review

Thanks to all of you who commented on the proposed changes to the rules. Ecology received comments and postcards from more than 600 people and organizations. Ecology staff are responding to all of the comments. Final rule should be ready in November.



Environmental Management for the 21st Century

International Standards Initiative will present this conference on ISO 14000, international environmental standards, November 6-7, 1995, at the Meydenbauer Center in Bellevue. This conference is geared for professionals interested or involved in environmental management, regulatory, quality, legal, policy, or risk management issues who want to be prepared to meet new International guidelines.

Market-driven Environmental Management Systems are fast becoming a requirement for doing business in some areas. Topics covered will include: general principles of environmental auditing, the technical perspectives of life cycle assessment, and principles and issues of environmental labeling.

For information contact the International Standards Initiative at (206) 392-7610

FREE INFO

These Ecology materials are available at no cost. To order call 1-800-633-7585 or (206) 407-7472

Assessing Dangerous Waste Secondary Containment, # 95-420

Secondary containment is used to capture and contain releases and spills of dangerous wastes from primary containment structures, thus preventing their release into the surrounding environment. If you are responsible for assessing the adequacy of secondary containment used at your facilities a new publication is available to help you,

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 rebuilder, 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.

Floor Drains and Waste Don't Mix #94-117 This short publication gives information on why floor drains should be sealed, and outlines steps to follow that will keep existing drains from polluting the environment.

Discussion Paper on Used Oil Burned in Space Heaters (September 1990) This document explains the current state used oil regulations, and answers specific questions on burning used oil in space heaters.

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.

Green Lights

Green Lights is a voluntary program to help businesses cut their electricity costs through lighting upgrades. Green Lights is sponsored by the U.S. Environmental Protection Agency (EPA). It is a partnership of corporations, utilities, manufacturers, government organizations, associations, environmental and other groups who have come together to create a cost-effective and environmentally beneficial solution promoting the widespread use of energy efficient lighting.

New lighting is an opportunity to decrease costs and prevent pollution, not just an overhead cost. By changing their lighting, participants are seeing energy use reductions of up to 50% with average 30% returns on their investments. When energy use goes down, this equates to less air emissions from power plants and improved fish habitat and stream flow in areas with dams generating hydroelectricity.

Utility energy conservation programs involving incentives and rebates operate independently from Green Lights, but they usually function to support and encourage Green Lights concepts. Green Lights in turn is very supportive of these programs and encourages them. One software item available from Green Lights is a listing of all lighting incentive/rebate programs with information on who to contact for more information.

Green Lights is voluntary, but participants sign a memo defining their commitments and EPA's support. This support can include help with lighting technology, financing decisions, and public recognition opportunities. Partners agree to update their lighting within five years if it's profitable and quality is maintained or improved.

Some local Green Lights participants include: Boeing, Microsoft, SeaTac Airport, Westin Hotels, Albertsons, Larry's Markets, Puget Sound Power, Virginia Mason Medical Center, and Tinyman's. For more information call Ron Radke at the U.S. EPA (206) 553-2148.

Tips for Painters

There are as many reasons to paint items as there are things to paint. If you use paints here are some tips to help reduce waste and protect your health and the environment. The most important starting point is to make sure all operators get the training they need.

Use these painting techniques:

- ✓ Get the most out of every drop of paint:
 - keep lids tight on all cans of solvent and paint
 - use water based primers and topcoats, whenever possible
 - use the smallest paint cup practical
 - use a computerized paint mixing system and other automations
 - for spray guns:
 - use special gun washers that minimize the amount of solvent
 - use the most efficient gun type or other application system for each situation
 - practice to reduce the amount of over spray
- ✓ Make sure you have a paint booth filter system for capturing particulates
- ✓ Use up whats at hand before buying new finishes
- ✓ Buy only as much paint as you know you'll need for small jobs
- ✓ Buy in bulk if you can use it up
- ✓ Try to mix batches with just enough and no more for each job
- ✓ Never evaporate paint waste or shoot it into the air
- ✓ If you use toxic products, make sure your paint and paint wastes don't end up in the environment (air, sewer, ground)
- ✓ If you are doing a job for someone else, give them small amounts of what would otherwise be waste paint to use for future touch-ups
- ✓ See if you can reduce the number of different coatings used
- ✓ Consider dedicated guns and lines for each coating
- ✓ Check with your industry associations for more ideas
- ✓ Consult your sewer authority before discharging rinsate
- ✓ Handle non-latex paint wastes as hazardous waste

Case Study - *Parker Paint*

At Parker Paint's manufacturing plant in Tacoma, hazardous waste generation has dropped from 100,000 pounds per year to just 5,000 pounds per year. They have sought out and used many sensible pollution prevention solutions to achieve this 95% reduction. Much of the credit is the contagious zeal for pollution prevention practiced by company Environmental Affairs Manager, Tracy Johnson. "I believe the key to our success so far is our people. Employees at all levels at Parker have embraced our pollution prevention ethic," says Johnson.

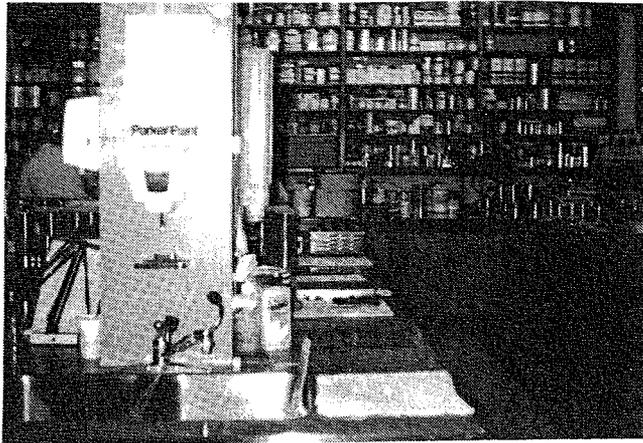
Dave Johnson and Dan Pelton of the maintenance department have shown outstanding leadership. According to Johnson, "the maintenance department has come up with creative solutions to the challenges put forth by the pollution prevention program at Parker."

With help from Ecology's toxics reduction staff, and the good work of the maintenance department, Parker has reduced its hazardous waste generation down to just one sludge waste stream.

Highlights of Parker's pollution prevention program include: an internal tracking system, a solvent reuse program that has vastly cut the amount of solvent going to the recycling still; providing secondary containment for the whole plant in case of spills, stormwater management via closing off all drains, using filtered stormwater as an ingredient in latex paint, and installation of a cooling tower which saves 5000 gallons of water a day.

Parker has enjoyed a good working relationship with Ecology, as well as other state and local agencies. Bob Goldberg and other Ecology staff have been helping Parker with their P2 program for two years. The latest project at the facility is a pilot paint stewardship program that will take 1650 gallons of leftover paint from contractors and process it into new Parker Paint products.

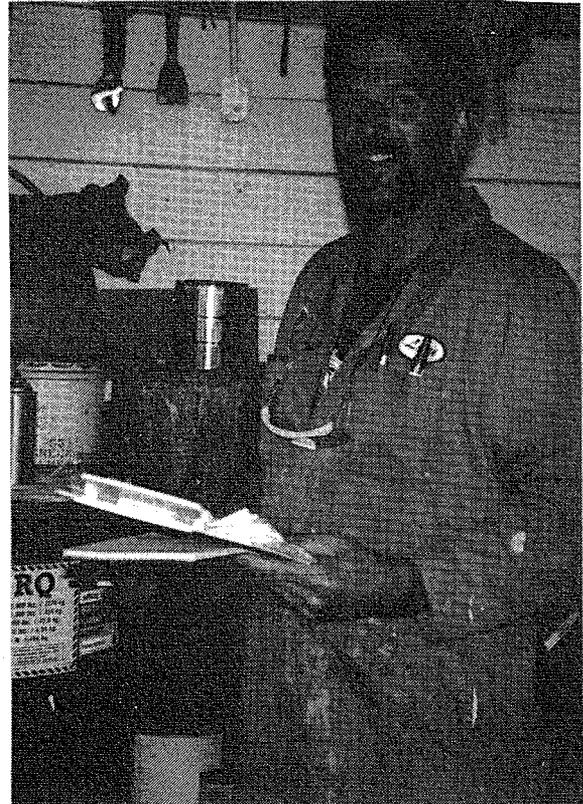
If you have questions about Parker's success, Tracy Johnson can be reached at (206) 473-1122.



Keep Learning
Chemists at Parker continually look for ways to improve their product. The Research and Development program aims to make products safer for employees and customers.

Know What You Use

An important aspect of Parker's pollution prevention program is the Internal Tracking System. Management can measure progress in terms of materials and costs. Each item is assigned a code and number. Staff keep a record of what is made, when and where. Notice the careful labeling on the drum. Parker takes secondary containment an extra step, the whole facility is designed to provide secondary containment should a spill occur anywhere. Larry Holm, Parker's front line spill cleanup person makes sure profiles match and does inventory tracking from satellite waste disposal area.



Find Ways to Recycle

To Parker's 250 employees, no item is just waste. There are pallet, cardboard, and office paper recycling programs which has saved over \$30,000 in two years. Even the paper bags raw materials come in were tested to ensure they can be part of the local paper recycling program. Michael Jones, Canning Foreman recycles cardboard.

Reminder about Annual Reports

All generators with RCRA Site ID numbers should already be aware that the 1995 Dangerous Waste Annual Report Forms are different than the previous years' forms (Form 4 and Form 5). You should have received the new forms last December, enclosed with your 1994 forms. If you have not yet read through the new forms, don't delay any longer. You must know what kind of information you should now be collecting in order to be ready to complete your 1995 dangerous waste annual report which is due March 1, 1996.

Key Changes to the Annual Report

- ✓ Report has a new format and asks for some new types of information, as explained in the reporting instructions.
- ✓ Small Quantity Generators (SQG) will have reduced paperwork.
- ✓ Medium Quantity Generators (MQG) report total yearly generation of individual "waste streams," reporting manifested shipments is optional.

The new forms are designed to streamline the reporting process, while collecting waste generation information which is vital to Ecology and the U.S. Environmental Protection Agency (EPA).

To help you get started with the new forms, Ecology will be providing annual reporting information at the hazardous waste generator workshops in December of 1995, and January and February of 1996. Workshop schedules will be mailed in early November. If you have questions about the new forms, or the workshops, or if you need copies of the 1995 annual report forms, call Ecology at (360) 407-6736.

New Dangerous Waste Information Management System

Did you know that Ecology received almost 7000 Dangerous Waste Annual Report Forms for the 1994 reporting year? All forms, which are submitted by sites with RCRA site ID numbers, must be checked and computerized.

Ecology has developed a new Dangerous Waste Information Management System. Using this system the new annual report forms will be processed more quickly and efficiently.

Reporting Streamlined

The information system will make reporting easier, particularly for small quantity generators (SQG). For the first year only, all generators will be required to complete the General Site Information Form (GSI). In the second, and all future years, generators will be sent a preprinted Registration Verification Report (RVR), to replace the GSI portion of the annual report. Generators will then simply mark changes on the RVR, sign it, and return it to Ecology.

If your site qualifies as a SQG, the signed RVR will satisfy your dangerous waste reporting requirements for the year. Medium and large quantity generators will be required to complete additional forms.

Annual Reporting for Vehicle Repair, Engine Rebuilders, and Radiator Shops. Special two hour workshops for these and other small and medium quantity hazardous waste generators. Call Jan Brydsen for details and to register, (509) 456-2876. FREE.

Dec. 5,	Ellensburg
Dec. 5,	Moses Lake
Dec 6,	Pasco (Tri-Cities)
Dec 6,	Walla Walla
Dec. 7,	Pullman
Dec. 7,	Spokane (2)
Dec. 12,	Colville
Dec. 12,	Yakima (2)
Dec. 13,	Okanogan
Dec. 13,	Wenatchee

Hazardous Waste Generator Workshops

Ecology is hosting workshops to help hazardous waste generators learn about compliance issues. Attend to learn about new reporting forms, find out answers to compliance questions and to ensure that your business keeps within all guidelines and regulations.

Eastern and Central Regions:
Call Jan Brydsen at (509) 456-2876 to preregister. FREE.

Yakima Jan 10, 8:30-4:00pm
Spokane Jan. 23, 9:00-5:00pm
Tri Cities Jan. 25, 9:00-5:00pm
Okanogan Jan 15, 6:00-9:00pm
Wenatchee Jan 16, 6:00-9:00pm
Goldendale Jan 17, 6:00-9:00pm

Southwest Region:

To register please call (360) 407-6357

Two hour workshops for the smaller generator, cost is \$10
Jan. 16 Aberdeen
Jan. 17 Chehalis
Jan 18 Vancouver
Jan 22 Tacoma

Half day workshops will be held quarterly cost is \$15 in advance, or \$20 at the door. Discount for prepayment of future sessions.

Jan. '96 topics: annual reports, manifests, regulation changes and site regulatory status.
Feb 13 Lacey sessions 1 & 2
Feb 15 Lacey sessions 1 & 2

Northwest Region:

Hazardous Waste Management To register call Victoria Sutton at (206) 649-7085, small fee required. Half day workshops, + optional 2 hr annual reporting review.

Mt Vernon, Jan. 30
Everett, Feb. 1
Bremerton, Feb. 6
Seattle, Feb. 8

Questions and Answers

Q I use a lot of cleaning solvents from spray cans. They are getting expensive and don't seem to last long. Is there something better?

A Many shops are phasing spray cans out of use. First make sure all cans are used-up. If you have aerosol cans that are full of product, but that have lost their propellant charge, the best option is to return the defective product to the vendor for exchange.

Otherwise, you may puncture and drain the contents for use manually or perhaps in another container that can be air-pressurized. Some businesses purchase products such as spray cleaners in bulk and buy durable reusable spray containers to use for the actual application. This is a good option for replacing many aerosols and often saves money as well as eliminating the generation of waste aerosol cans.

- ✓ Review the different uses and types of aerosol products found at your facility. You may find that you do not need to buy as many different products to cover the necessary applications.
- ✓ Check with your local recycler to find out if they will accept empty aerosol cans with other steel/tin cans for recycling.

✓ Partially used cannisters that must be disposed should be designated to determine if they are hazardous waste. Some counties have hazardous waste turn-in events for businesses and you might be able to bring your containers there.

Q It's important for our fleet to look clean so we wash our vehicles often. What's the best way to deal with all the dirt and oil we are washing off?

A Ecology's Water Quality publication, "Vehicle and Equipment Washwater Discharges," R-95-56 explains best management practices. Most sewer utilities will agree to give you a permit to use sewers for washwater, make sure you ask for a permit.

- ✓ Never allow washwater to go down storm drains.
- ✓ If possible, wash vehicles in a building or covered area.
- ✓ If a building isn't available wash over a paved surface only and collect and contain all water.
- ✓ Make certain your washing operation is well away from drains that lead to a storm drain, dry well or septic tank.
- ✓ Consider a closed loop water recycling system- it saves water and reduces disposal costs.

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: (360) 407-6300
Yakima: (509) 575-2490
Spokane: (509) 456-2926

The Department of Ecology is an equal opportunity agency and does not discriminate on the basis of race, creed, color, disability, age, religion, national origin, gender, marital status, disabled veteran's status, Vietnam Era veteran's status or sexual orientation.

If you have special accommodation needs or require this document in alternative format, please contact Dave DuBreuil at (360) 407-6721 (Voice) or (360) 407-6006 (TDD).

Shoptalk

Shoptalk is produced quarterly by the Hazardous Waste and Toxics Reduction Program, Washington State Department of Ecology (360) 407-6740

Editor: *Bonnie Lynn Meyer*
Technical Editor: *Chipper Hervieux*
Contributors: *Mark Benedict, Jan Brydsen, Bob Goldberg, Bob Lemcke, Jim Pearson, Joanne Phillipson, Ron Radke (EPA), Janet Rhodes, Dave Saunders, Tim Schlender, Vicki Sutton.*

Distribution/Mailing List Changes: *Cathy Bouge*
(360) 407-6719

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

BULK RATE
U.S. POSTAGE PAID
Washington State
Department of Printing

Check out our FREE
publications on p. 3