



ShopTalk

Spring 1996
Vol. 6, No. 2

A quarterly publication for hazardous waste generators

Getting Container Labeling Right

Have you ever opened the refrigerator and pulled out a mystery item? It could be edible or disgusting. You can't know until you open the container. Don't let this happen when you deal with hazardous materials.

Label all hazardous wastes and hazardous materials at your facility. There are some excellent reasons for being a careful labeler:

- ✓ Preserving your chance to recycle. Recycling is usually possible only if you are 100 percent sure of what is in a container.
- ✓ Disposing of waste is costly. If the material is a hazardous waste you will have to arrange for disposal. Disposal costs are often higher for mixed wastes. If you aren't sure what is in a container, you may not be able to dispose of it until you have performed expensive testing.

- ✓ Preserving your investment. An unmarked container may contain expensive product. Mislabeled containers could cause you to waste material you paid good money for.
- ✓ Avoiding product contamination. Accidental material mix-ups can destroy product quality and waste whole batches of otherwise usable material.
- ✓ Labeling is required by the *Dangerous Waste Regulations*.

What Does Ecology Require?

You must use containers designed to safely hold your waste. Keep the container closed unless you are adding or removing material.

When you accumulate a hazardous waste, clearly mark the container with the words "Dangerous Waste" or "Hazardous Waste".

Mark each container with a label or sign that identifies the major risk(s) from the waste. The sign or label must be clearly visible to employees, emergency response personnel and the public.

Ecology technical assistance specialists and compliance inspectors help businesses make sure containers are properly labeled and securely stored.

You may use labels that meet the guidelines set by the US Department of Transportation or the National Fire Protection Association to meet local, state and federal requirements. For example, the NFPA diamond-shaped labels include indicators on human health effects, flammability, reactivity and personal protection requirements.

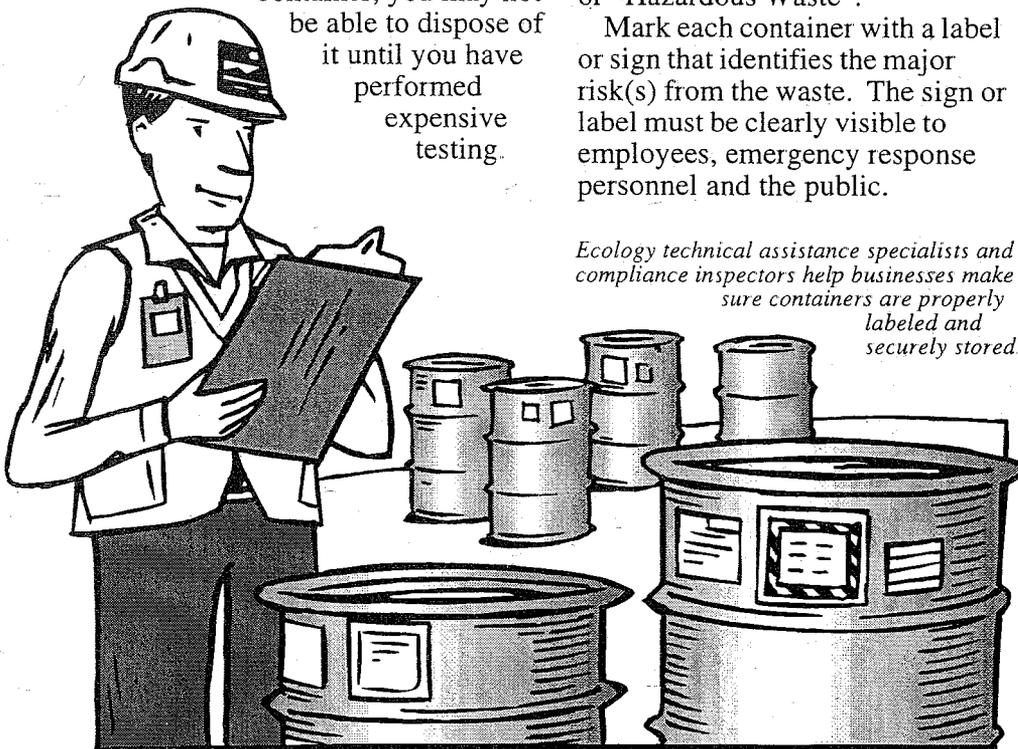
Mark the accumulation start date on each waste container. The accumulation period begins on the date that:

- ❖ you first generate the waste and put it into a container, or
- ❖ you accumulate more than 55 gallons of non-acute dangerous waste in a satellite accumulation area.

When you transfer a hazardous waste from one container to another, make sure to label the new container. Even if the new container is only for temporary storage — label it. Keep the original accumulation start date.

Also be sure to remove old labels from empty containers. The legal definition of empty is very specific. To be considered "empty", a container that holds less than 110 gallons must be drained so that less than one inch of waste - or 3 percent of the total capacity - remains in the drum.

(continued on page 2)



Inside:

Dust Control	2
New Requirements for Recycled Used Antifreeze	2
Case Study - K2	3
Win the Governor's Award for Pollution Prevention	3
Questions and Answers	4

Container Labeling

(continued from page 1)

The *Regulations* list specific rinsing instructions if the container once held acutely hazardous waste or pesticides bearing a warning label.

Watch Out for Products Too

Ecology suggests that you store all products in properly labeled containers. People often transfer product into a small container to make it easier to use for a specific project. Even if the container has little space for labeling, still label it. Marking the container with the product name and concentration/dilution ratio makes it possible for you to use up what is left before tapping into your inventory. Without a label you end up wasting the product, and you may be stuck with dangerous waste.

Call a hazardous waste specialist at your local regional office for more specific information on container labeling and storage requirements.

Free Training for Lithographic Printers

On May 17, Ecology will sponsor a satellite video conference entitled, "Green and Profitable Printing". The televised training session will show from 7:30 a.m. - 9:30 a.m. at a number of locations around the state.

The training will emphasize pollution prevention techniques for small lithographic printers, along with other topics on environmental management.

Call Judy Beitel at (360) 407-6878 to get information on conference site locations and to pre-register for the training.

Used Oil and Dust Don't Mix

Dust is often a problem in Washington State, especially in dry weather. Don't let your dust control system be a problem too.

The use of used oil for dust suppression or weed abatement is prohibited in Washington. Do not use products that list used oil as an ingredient. This practice pollutes drinking water sources, lakes, rivers and streams. One gallon of used oil can pollute up to one million gallons of water.

To control dust without using chemicals:

- ✓ Develop property in phases to minimize exposed soil.
- ✓ Soak unpaved areas with water that is too muddy to use elsewhere. Make sure it does not run off-site.
- ✓ Use wind fencing.
- ✓ Plant vegetative cover.
- ✓ Restrict traffic on-site.
- ✓ Reduce vehicle speed.
- ✓ Cover piles of dirt.
- ✓ Pave or otherwise improve the site.

Manufacturers market a variety of chemical dust suppressants that can be used if these other options are not practical. Preferably, restrict use of chemical dust suppressants to unpaved roads with low traffic volume. The chemical must not pollute surface or ground water if it should eventually migrate from the application site.

Toxics reduction specialists in Ecology's regional offices have the most current information on safe methods of dust suppression. Call them at the phone numbers listed below:

Bellevue: (206) 649-7000
Lacey: (360) 407-6300
Yakima: (509) 575-2490
Spokane: (509) 456-2926

Requirements Change for Recycled Used Antifreeze

Ecology has issued new guidance for the management of used antifreeze that is being recycled. With help from the automotive repair and antifreeze recycling industries, Ecology recently updated management standards for used antifreeze. These changes will be proposed as amendments to the *Dangerous Waste Regulations* in late 1996 or 1997.

Highlights of the changes include:

- ✓ Used antifreeze sent for recycling does not count toward monthly generator waste totals and does not have to be reported on your annual report.
- ✓ Used antifreeze sent off-site for recycling needs no manifest.
- ✓ Small quantity generators may transport their used antifreeze to a recycling or disposal service.
- ✓ Any amount of used antifreeze intended for recycling can be accumulated on-site for any length of time. Follow the Best Management Practices listed in the Winter 1996 issue of *Shoptalk* to minimize risks to the public and the environment.
- ✓ Keep volumes of accumulated waste low by properly and routinely recycling the waste.
- ✓ Antifreeze that is not recycled is considered dangerous waste.
- ✓ Generators must keep proof of recycling for at least five years.
- ✓ Generators must manage their used antifreeze in a way that does not threaten human health or the environment.

People who choose not to recycle their used antifreeze, but dispose of it instead, are subject to all the applicable requirements of the *Dangerous Waste Regulations*. Burning used antifreeze for energy recovery or mixing used antifreeze with used oil is **not** considered recycling. These disposal methods are subject to full regulation.

Call 1-800-633-7585 to request a copy of the guidance letter that explains the new requirements.

Case Study - K2 Corporation



with reusable cloth towels. The cloth towels are centrifuged to remove any recyclable solvent before the towels are sent to a commercial laundry.

K2 is located on an island with only one water source, so the

K2 Corporation employees, Sherrod Hitch (front) and Diana Healey (back), complete a final finish inspection on a snowboard as part of the manufacturing process.

company is sensitive to the amount of water used and the quality of its discharge. K2 switched from a water-cooled molding process to one that is air-cooled, saving 300,000 gallons of water annually.

These changes directly benefit K2's 700 local employees. K2 also reaches out to help the environment by donating money to groups that protect the environment, especially rainforests. Contributions totaled nearly \$50,000 between 1993 and 1994.

For more information on the pollution prevention methods listed in this story, contact a toxics reduction specialist in your regional office.

Vashon Island's K2 Corporation manufactures snow skis, snowboards, in-line skates and accessories for sale worldwide. Since their business depends on the enjoyment of a high-quality outdoor environment, all employees are dedicated to environmental protection. K2 was a winner of the 1995 Governor's Award for Outstanding Achievement in Pollution Prevention.

Process improvements made it possible for K2 to achieve two important goals: manufacture a better product and eliminate the generation of some dangerous wastes. For example, K2 changed half of the 1994 ski models to one-color bases. This cut in half the company's use of silk-screen inks and solvents. K2 stopped using another solvent product, related to gluing in ski tops, by molding together the tops and bases. These types of changes have dropped regulated air emissions by 68 percent since 1991.

Since 1986, K2 has recycled more than 172,000 pounds of solvent in an on-site distillation unit. K2 replaced paper towels

Win the Governor's Award for Pollution Prevention

In June, Governor Lowry will recognize leadership in pollution prevention by awarding the Governor's Award for Outstanding Achievement in Pollution Prevention.

This prestigious award recognizes businesses with broad achievements in pollution prevention. Applicants must show that their program is a winner by demonstrating innovation, reductions achieved, benefit to the environment, health and safety improvements, economic benefits, commitment and leadership.

Previously recognized award recipients may apply for continued excellence awards. All Washington State-based businesses and government facilities may submit applications by **April 19, 1996**. To receive an application call (360) 407-6719. If you have specific questions or would like more information, call (360) 407-6740.

Free Information

To order, call 1-800-633-7585 or (360)407-7472.

Transporting Hazardous Waste and Hazardous Materials: Information for Small Quantity Generators, #96-400, answers basic questions about transporting hazardous waste.

Hazardous Waste Services Directory, #91-12s, includes a list of antifreeze recyclers.

FOCUS: Clean Air Guidelines for Building and Construction Projects, #95-1004, suggests ways to safely minimize dust at outdoor worksites.

FOCUS: Used Oil Disposal Prohibitions #F-SHW-92-112, explains legal methods of used oil disposal.

Hazardous Waste Generator Checklist, #91-12b, Rev. 1/96, summarizes generator requirements under the *Dangerous Waste Regulations*.

Questions and Answers

Q I received a solvent sample from a vendor. I tried the product, but it doesn't work well. How do I dispose of what is left?

A First, think of the sample as a product — maybe someone in your shop has a use for it. You may also find another business that can use it. Depending on the amount, consider listing the solvent through the materials exchangers at the Industrial Materials Exchange, (206) 296-4899, or the National Materials Exchange Network, (509) 466-1532. If these fail, try to send the product back to the vendor. Unless you can use it, the solvent is now a waste. You are responsible for proper disposal. Small quantity generators can take samples to a permitted moderate risk waste facility, a treatment, storage and disposal facility, or a recycling facility.

Next time, don't accept the sample without a return privilege from the vendor.

Q Can I air dry my shop rags drenched with hazardous solvent?

A No, you cannot let them air dry. This practice is illegal.

Safely manage your shop rags by wringing them out and reusing the solvent.

Keep dirty shop rags in a covered container until the laundry service picks them up. The rags must be treated as dangerous waste unless you send them to a permitted laundry facility.

To minimize this problem, use non-hazardous solvents and products where possible. If you use disposable wipers, segregate the hazardous shop rags for easier laundering or disposal. Read Ecology Focus sheet #92-116, *Used Shop Towels* to obtain specific information on managing used shop rags.

Q Have there been any recent changes to the biological and chemical testing methods? My information seems kind of old.

A The Hazardous Waste and Toxics Reduction Program is updating the *Dangerous Waste Biological Testing Methods*, publication #80-12, and the *Dangerous Waste Chemical Testing Methods*, publication #93-51, to reflect recent amendments to Washington's hazardous waste regulations. If you, your consultant or your laboratory are interested in these changes, call Stacie Singleton at (360) 407-6753.

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 and Affirmative Action employer and shall not discriminate on the basis of race, creed, color, national origin, sex, marital status, sexual orientation, age, religion or disability as defined by applicable state and/or federal regulations or statutes. If you have special accommodation needs or want more information, please contact the Hazardous Waste and Toxics Reduction Program at (360) 407-6700 (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) 407-6759. E-mail address <http://bmey461@ecy.wa.gov>

Editors: *Bonnie Meyer and Shirley Levig*

Layout: *Joan Morris*

Technical Editor: *Chipper Hervieux*

Contributors: *Bob Burmark, Christa Boedigheimer, Darin Rice, Jim Sachet, Stacie Singleton, Tim Schlender*

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

See New Antifreeze
Standards on page 2