

# ShopTalk

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## Is It A Product Or A Waste?

Are the materials described below products or wastes?

- ✓ A large painting contractor has over forty containers of unused paint and used thinner. He stores them outside his main shop and says he plans to remix them or use them "as is" on future jobs.
- ✓ A chrome plating company keeps eight drums of spent hydrochloric acid in its storage area. The manager says they can regenerate the acid and use it again for parts cleaning and stripping.

✓ Seventeen various-sized containers of lube oil, cutting oils, machine coolant and paint are kept

behind a machine shop. The operator bought them as a "lot" at an auction. He uses some of the cutting oils, but has not yet found a use for the rest.

Normally, it is relatively easy to tell when something is a waste — the business operator says it is. In the examples above, the operators plan to eventually use the materials. The *Dangerous Waste Regulations* allow generators to reuse or recycle materials without calling them dangerous wastes.

Ecology staff occasionally come across materials that have been stored for several years without any attempt to use them. When this happens, inspectors ask a series of questions to

decide if the materials are still useable or if they have become dangerous wastes.

*Southwest Regional Office Hazardous Waste Specialists Nicky Rushing (right) and Joe Cason (left) go over a checklist from a recent inspection. As compliance inspectors, they often need to decide if a material is a product or a waste.*

Are there signs of spills or releases?

Spills and leaks indicate containers have been neglected, attacked by the weather or are corroding.

Does the owner know what the materials are?

Product labels, Material Safety Data Sheets, and sales brochures list what materials are as well as their age, hazards and if they can be reused or recycled.

Are the materials managed in the same way as other products kept on-site?

Materials should be kept indoors in sealed, labeled containers. This shows that the owner values them.

How old are the materials and what condition are they in?

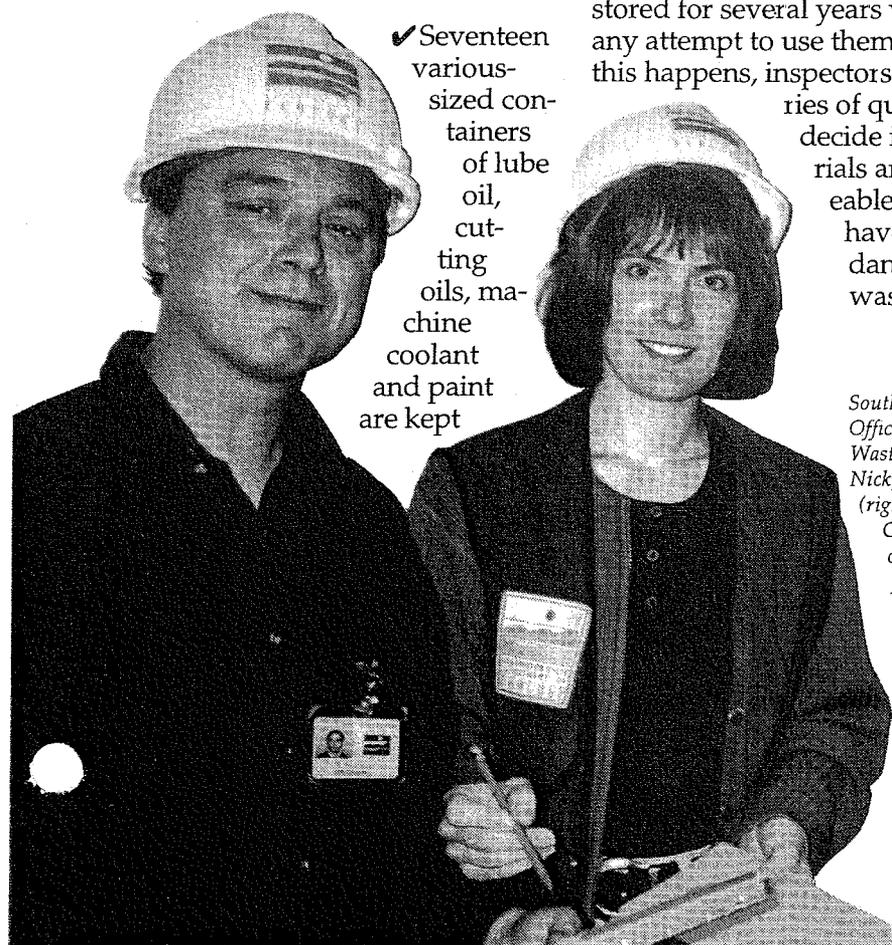
Materials can deteriorate with age and exposure to the elements. They should not be past the product shelf life or contaminated with rust or water, which makes reclamation difficult and expensive.

Can the business show that it has the ability to use or recycle the materials?

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## Is It A Product or A Waste? (continued)

A business shows a pattern of use or recycling by having the equipment or contracts in place, or by keeping records showing that reuse occurs. Generators must show that 75 percent of an accumulated material has been legitimately recycled over the course of a calendar year. If this is not possible, the material becomes a solid waste and possibly an illegally stored dangerous waste. All dangerous waste must be properly managed under the conditions of the *Dangerous Waste Regulations*.

The answers to these questions can uncover a situation that could threaten the environment. If there is little evidence to support a claim that materials can or will be used as products, Ecology may declare them to be wastes. The owner of the materials must then determine whether they are dangerous wastes and manage them accordingly.

Questions? Call your local Ecology regional office listed on page 4 and ask for a Hazardous Waste Specialist.

## Applications Delayed for Public Participation Grants

Trade associations and other non-profit groups interested in educating people to prevent hazardous waste will have to wait this year to apply for Ecology's Public Participation Grants.

The application period will begin October 1 and run through November 15.

For more information, call Kathy Seel at (360) 407-6061.

## Illegal Drug Labs Target Businesses

All over Washington, businesses report the theft or disappearance of chemicals and hardware that can be used to manufacture illegal drugs. Drug labs mostly produce methamphetamine, also known as crystal, crank, ice or speed. It is a powerful and addictive stimulant.

The Washington State Patrol reports that its Statewide Incident Response Team has responded to more illegal drug labs in the first four months of 1997 than in all of 1996. Similar figures are reported by the Ecology staff who dispose of the chemicals found at illegal drug labs.

Many businesses keep items on hand that can be used to manufacture methamphetamine. Make sure to keep any of the items listed below in a secure place.

Commonly found over-the-counter items include:

- ✓ solvents
- ✓ coffee filters
- ✓ pseudoephedrine (Sudafed)
- ✓ blenders
- ✓ lithium batteries

The chemicals required to make this drug include:

- ✓ acetone
- ✓ acetic anhydride
- ✓ anhydrous ammonia (gas)
- ✓ ephedrine
- ✓ ether
- ✓ hydrochloric acid
- ✓ hydriodic acid
- ✓ hydrogen chloride (gas)
- ✓ lithium (metal)
- ✓ methanol
- ✓ methyl ethyl ketone
- ✓ pyridine
- ✓ sodium (metal)
- ✓ sodium hydroxide
- ✓ sulfuric acid
- ✓ thionyl chloride
- ✓ toluene

Laboratory areas can supply a drug lab with hardware, specifically:

- ✓ condensers
- ✓ reaction flasks
- ✓ vacuum flasks
- ✓ funnels
- ✓ heating mantles
- ✓ rheostats
- ✓ vacuum pumps

Contact your local law enforcement agency if you believe any of these items have been stolen from your business.

## Do You Pay Too Much for Waste Management?

Some businesses pay more than they should to manage their dangerous waste. The *Dangerous Waste Regulations* give breaks to generators who reuse or recycle their waste.

Many firms do not know about these allowances so they dispose of their waste instead of reusing or recycling it. One Washington chemical manufacturing company found that its spent catalyst would not be regulated as a dangerous waste if it was reclaimed. This saved the company a large amount of money.

Ecology's guide, *Regulation of Dangerous Wastes Being Recycled*, publication #91-46, pulls together the sections on dangerous waste recycling from the *Dangerous Waste Regulations* and presents them in a simplified form. To get your copy, call Ecology at 1-800-633-7585, (360) 407-7472 or contact your nearest regional office.

## Single Industry Campaign Update: Integrated Pest Management in Schools Project

This spring, Master Gardeners and Master Home Environmentalists volunteered to visit over fifty schools to help grounds and custodial staff use an Integrated Pest Management approach to control weeds, insects and rodents.

Integrated Pest Management stresses the use of a variety of reliable, cost efficient and environmentally safe methods. Users of this technique closely monitor a pest situation before deciding if it needs to be treated, and then choose the method that will work best. Chemicals are usually used as a last resort.

Ecology helped train the volunteers who visited schools in Grant, King, Pierce and Spokane Counties. In addition, project staff developed sample school policy guidelines, fact sheets about pests and pesticides, and information on how to evaluate the costs and risks of pest control methods.

The volunteers walked through and around school buildings to help point out potential food sources, entryways and nesting areas for pests. The volunteers also collected information to create a snapshot of pest management practices in schools.

Participating schools were interested in finding ways to avoid unneeded exposure to toxic chemicals and the high costs of buying and using them.

According to Dan Bishop, principal at Evergreen Primary in University Place near Tacoma, "The key value of the program is that it raises staff awareness of how some kinds of practices that are now used or considered for controlling pests could be harmful to staff, students and the environment."

For more information on this project, contact Peggy Morgan at (360) 407-6739.

## Domestic Sewage Exclusion

In response to questions from generators, Ecology has further defined the types of hazardous waste businesses can discharge to a sewage treatment plant. This clarification of the Domestic Sewage Exclusion further protects wastewater treatment plants and keeps hazardous wastes from polluting the water, land and air.

Now, only wastewaters containing **state-only toxic waste**, like ethyl alcohol, or **highly dilute listed waste**, like acetone, may be considered for a discharge permit. Both will be subject to pretreatment standards. State-only toxic wastewaters must also be treatable by the receiving sewage treatment plant.

A written permit, discharge authorization or temporary permit is still required for all sewered hazardous wastes. These permits are issued by Ecology's Water Quality Program or an authorized wastewater treatment facility.

Before being considered for a permit, pollution prevention measures — like source reduction or recycling — must be applied to the greatest extent feasible. For example, a business probably would not receive a permit to send antifreeze to the sewer since antifreeze can be purified and reused. Many wastes will no longer need to be discharged to sewers at all after waste reduction measures are applied.

Environmental specialists at a nearby regional office can help you find ways to apply waste reduction measures to sewer discharges and meet hazardous waste requirements.

Ecology's latest publication on this topic, *Domestic Sewage Exclusion*, publication #94-136, Rev. 6/97 is also available. Call 1-800-633-7585, (360) 407-7472 or your local regional office to request a copy.

## Ecology Helps Businesses Protect the Environment

In the spring issue of *Shoptalk*, we reported how Ecology and businesses have worked together to improve the way hazardous waste is managed in our state.

Two goals of the Hazardous Waste and Toxics Reduction Program have been to contact more businesses and to clean up contaminated sites. With help from Washington generators, we have met both goals.

In 1996, program staff visited 1282 businesses. Hazardous Waste Specialists conducted 431 compliance inspections while Toxics Reduction Specialists made 851 non-enforcement, technical assistance visits. A total of 3697 generators attended one of our 80 workshops.

Additionally, we safely closed 54 hazardous waste management

units that could have harmed human health or the environment. The payoff for this effort was the clean up of 9655 cubic yards of soil and 35,616 pounds of contaminants, made up mostly of petroleum products.

As a result of these activities, a smaller amount of hazardous waste is generated each year, safer management practices are used for waste that is generated, and fewer sites are becoming contaminated.

Ecology continues this effort in 1997. Contact your nearest regional office to ask for help from one of our environmental experts or to get information on the generator workshops scheduled for later this year.

## Questions and Answers

**Q** Can I control dust at my worksite by applying used oil to the unpaved roads?

**A** No. Washington State has banned the use of used oil as a dust suppressant since 1992. Used oil usually contains heavy metals like cadmium, chromium and lead, and toxic chemicals like benzene. It may also be contaminated with solvents and antifreeze. Used oil poured onto the ground can pollute water and will contaminate soil.

**Q** Since I can't use used oil, how can I keep the dust down?

**A** There are many ways to control dust that don't involve using chemicals. Lower speed limits, restrict travel by heavy equipment, and upgrade unpaved roads by adding surface gravel. Applying water may also help, especially for temporary dust problems at job sites.

**Q** Are any chemical suppressants safe to use?

**A** That depends on the ingredients used to make the product. Ecology does not regulate products manufactured for dust control. They are legal to use as

long as they do not contain any used oil or dangerous waste.

When used following the manufacturer's instructions, and away from environmentally sensitive areas, these products are usually safe.

It is a good idea to follow these steps before using any dust control chemical:

- ✓ Obtain and carefully review Material Safety Data Sheets.
- ✓ Ask the vendor if a product would designate as dangerous waste when applied to the ground, after drying or curing, or as a result of biochemical decay.
- ✓ Ask the product manufacturer for toxicity test results, including mammal and fish bioassays.

A regional Toxics Reduction Specialist can help you find a dust control method that will work for you and have the least impact on the environment.

*Techniques for Dust Suppression*, Ecology publication #96-433, describes different chemical dust suppressants and their environmental safety. Request a copy by calling 1-800-633-7585, (360) 407-7472 or your local regional office.

Ecology also has a vendor list for dust control products with product-specific environmental information. To receive a copy of this list, call Mark Benedict at (509) 575-2803.

## 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:* (425) 649-7000

*Lacey:* (360) 407-6300

*Yakima:* (509) 575-2490

*Spokane:* (509) 456-2926

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## Shoptalk

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