



# ShopTalk

Winter 1998  
Vol. 8, No.1

*A quarterly publication for hazardous waste generators*

## Pollution Prevention Relieves Long-Term Burden

Liability for hazardous waste begins as soon as it is generated and can last forever. Under state regulations, generators are responsible for the hazardous waste generated from the time the waste is created until after it has been accepted at a treatment, storage, disposal, or recycling facility. This is known as "cradle-to-grave" responsibility. Under Federal Superfund laws generators can be held liable for cleanup costs if mismanagement occurs. The Dangerous Waste Regulations are designed to help generators prevent releases to the environment. They also help ensure releases are controlled, contained, and, if necessary, remediated or cleaned up.

### Waste Transported Off-Site

Generators can directly control how waste is handled only while it is stored on-site. Most

waste is transported off-site. If there is an accident, the generator can be held liable for any release that occurs while the hazardous waste is in transit. That's why generators should use only reputable, knowledgeable transporters that ship wastes in accordance with the Dangerous Waste Regulations and Department of Transportation regulations. Make sure the waste is taken to a legitimate recycler or a permitted treatment, storage or disposal facility.

### What Can A Business Do?

The best solution is to generate less, or better still, *no* hazardous waste. If you don't create a potential environmental hazard, you won't have as many worries about long-term liability. Ecology toxics reduction staff can suggest ways to reduce or eliminate dangerous waste generation by improving processes and selecting safer products.

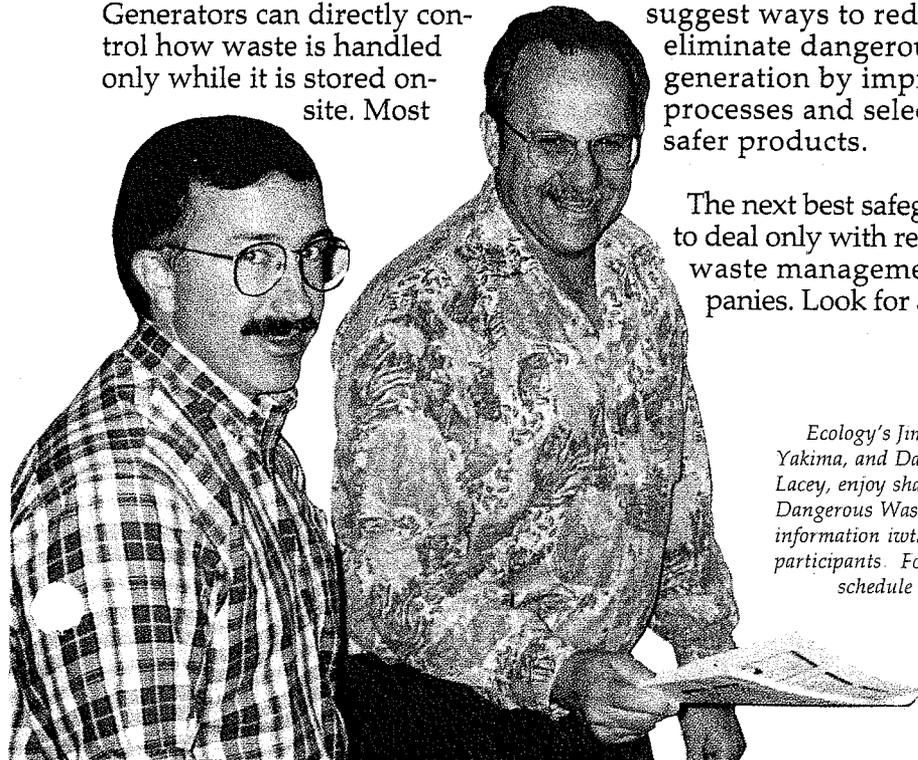
The next best safeguard is to deal only with reputable waste management companies. Look for a good

safety record and the ability to pay for correcting mistakes. Make sure they have insurance or bonds to cover the cost of cleaning up any major spills.

### Ask for Help

Investigate before doing business. Call your regional Ecology office (listed on the back page) or the environmental agency of the state where the treatment, storage, or disposal facility is located. Make sure you select transporters and facilities that have EPA or state-issued identification numbers. Ecology cannot recommend specific businesses, but can provide the compliance history of a business that you are considering using.

If you don't create dangerous waste, you don't create liability. Remember that you have "cradle-to-grave" responsibility.



*Ecology's Jim Pearson, Yakima, and Dave Saunders, Lacey, enjoy sharing Dangerous Waste Regulation information with workshop participants. For workshop schedule see page 2.*

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## Electronically Submit Annual Reports

Ecology's new computer software package, **TurboWaste**, can assist generators in preparing and submitting annual report data. Instead of filling out the Generation and Management, Waste Received, and Off-Site Identification Annual Report forms, generators can enter hazardous waste data directly into the software. The information can then be sent to Ecology on disk or over the Internet.

### Benefits of TurboWaste:

- ✓ Saves time and money
- ✓ Works for large and small companies
- ✓ Companies that don't have an automated information system can enter annual reporting data directly into the program
- ✓ Companies with annual reporting information in data files can directly transfer these data files into the program
- ✓ Easy to use because the screen display and print features are identical to the forms currently used
- ✓ Designed for multi-year and multi-site reporting
- ✓ Can be used to enter manifest shipment information
- ✓ The annual reporting data submitted is error-free because the software prompts you when corrections are needed
- ✓ Includes a series of reports to assist in managing waste information
- ✓ Calculation feature automatically totals waste and shipment amounts.

TurboWaste is FREE from Ecology's Internet homepage at <http://www.wa.gov/ecology/hwtr>

Copies of the software on CD ROM are available for \$10. For more information, see Ecology's Internet homepage, or call 1-800-874-2022 (in-state) or (360) 407-6170.

## Dangerous Waste Regulation Changes

Some changes to the Dangerous Waste Regulations will go into effect in February 1998. The change that may affect the largest number of people is adoption of the United States Environmental Protection Agency's Universal Waste Rule for all hazardous waste batteries and thermostats that contain mercury.

The changes mean that hazardous waste batteries and thermostats containing mercury now:

- ✓ Do not have to be counted or manifested
- ✓ May be accumulated for up to one year
- ✓ Must be clearly labeled as universal waste, for example, "universal waste batteries"
- ✓ Must be managed to prevent releases
- ✓ Must be sent to a recycling, treatment, storage, and/or disposal facility.

**NOTE: Universal waste cannot be satellite accumulated.**

More information on this and other rule changes will appear in future issues of *Shoptalk*. If you have questions about the rule changes, call your regional office listed on the back page. For a copy of the amended Dangerous Waste Regulations, Chapter 173-303 WAC, call Dave Zink at (360) 407-6752.

## Free Publications

*You Auto Recycle*, #97-433 - Vehicle recycling manual.

*Drilling for a Greener Practice*, #97-436 - Dental waste management manual.

*Save Money Through Smart Machine Coolant Management*, #97-404.

For copies of these publications, call 1-800-633-7585, or (360) 407-7472 or contact your local Ecology regional office.

## 1998 Annual Generator Workshops Open

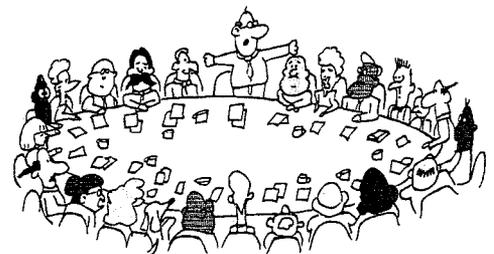
Ecology's annual workshops are back. The workshops are designed to help businesses that generate dangerous waste. Topics include waste designation, container management, and annual reporting. A \$35 registration fee (\$40 at the door) will be charged to cover the cost of room rental, materials, and lunch. Registration will open at 7:45am and the workshops will run 8:30am to 5:00pm at these locations:

Tues, Jan 6	Silverdale
Thurs, Jan 8	Mount Vernon
Tues, Jan 13	Longview
Thurs, Jan 15	Tacoma
Tues, Jan 20	Seattle
Thurs, Jan 22	Bellevue
Tues, Jan 27	Spokane
Thurs, Jan 29	Ephrata
Tues, Feb 3	Yakima
Thurs, Feb 5	Tri Cities

One college credit is available through Eastern Washington University for an additional \$35. It is pass/fail, and a three-page paper is required. Or, 0.8 Continuing Education credit is available for an additional \$12. Participants can register for credits at the workshop.

Workshops are filling up fast so make reservations now. Call (360) 407-6718 to register for the workshops or for exact locations. For more information, visit Ecology's website at:

<http://www.wa.gov/ecology/hwtr>



## Case Study: Busch Collision, Issaquah

Jim Busch, owner of Busch Collision, considers the environmental impact of all his business decisions. Busch's leadership in the autobody repair industry helped him win the 1997 Governor's Award for Outstanding Achievement in Pollution Prevention.



Jim Busch  
accepts award  
from Governor  
Locke.

Jim Busch  
chairs the  
Automotive

Service Association's National Environmental Task Force. He has written articles about hazardous waste reduction that have appeared in the *Autobody Craftsman Association* newspaper and *Automotive Service Association* publications. Always looking for ways to reduce his shop's wastestreams, he also wants to share what he has learned with the rest of the industry.

Busch Collision developed a prototype on-site recovery and recycling system that has allowed the shop to reuse antifreeze on a continual basis. "Just-In-Time" ordering ensures that leftover paint and materials never become a problem. Paint waste is also reduced through the use of a computerized mixing system. The shop's six employees receive incentives of cash awards for their recycling efforts. Annual training in hazardous waste management is a priority at Busch Collision.

## New Methylene Chloride Exposure Limits

New OSHA limits for methylene chloride exposure went into effect December 1, 1997. Many businesses are affected, so it might be wise to check the products you use. Methylene chloride is a common ingredient in many blanket roller washes, some adhesives, paint strippers, polyurethane foam blowing agents, degreasers and cold cleaners. Construction companies often use products that contain methylene chloride. Workers may be exposed while stripping paint or other coatings, applying foam, using epoxy paint, cleaning with solvents, or spraying adhesives. Workers are likely to be exposed to higher levels of methylene chloride when working in small, enclosed spaces that are not well ventilated.

Permissible exposure limits for an 8-hour period were lowered from 100 parts per million (ppm) to 25 ppm. The short-term exposure limit, measured over a 15-minute period, has been lowered from 500 ppm to 125 ppm. If a worker's exposure exceeds these limits, the facility must comply with several requirements: air monitoring, medical surveillance, personal protective equipment, and training. The best way to avoid the new requirements is to work with suppliers to choose methylene chloride-free products.

Call the Department of Labor and Industries for assistance or more information at (360) 902-5590. OSHA Methylene Chloride fact sheets are available on the Internet at: [http://www.osha-slc.gov/ergo/Facts/meth\\_facts.html](http://www.osha-slc.gov/ergo/Facts/meth_facts.html)

## National Training & Education Center Opens

The new Hammer Training Center in the Tri-Cities is open to provide state-of-the-art, hands-on hazardous materials training. The facility has true-to-life props to simulate emergencies and hazardous conditions. Props include: a 90-day storage pad with containment and simulated hazardous waste containers, a daylight view of a tank farm, a simulated characterization and remediation waste site, and a laboratory mock-up. There are conference rooms with video taping available, a computer room, 10 classrooms and a resource center. For more information contact Det Wegener (509) 373-2021, fax (509) 373-6070, or e-mail: [detlev\\_l\\_wegener@rl.gov](mailto:detlev_l_wegener@rl.gov)

## Ecology Tidbits

- ✓ Ecology/HWTR Management:  
**Ecology Director:** Tom Fitzsimmons; **Program Manager:** Greg Sorlie; **Regional Directors:** Southwest Region, Sue Mauermann; Northwest Region, Mike Rundlett; Central Region: Polly Zehm; Eastern Region: Tony Grover.
- ✓ Ecology's **Vancouver Field Office** opened in November. Eleven full-time staff provide a range of services which include issuing environmental permits, conducting inspections, and offering technical assistance on air, water, and hazardous waste issues.

The Vancouver Office was established to improve customer service to businesses and communities in Clark and Skamania counties. Visit the new facility at 2108 Grand Boulevard or call (360) 690-7171.

Watch for the opening of Ecology's **Bellingham Field Office** soon.

**Q** I want to try pollution prevention. Are there any easy, low-cost ways to avoid generating and being responsible for hazardous waste?

**A** Yes. Here are just a few general ideas to help get you started:

### Control Inventory

Some methods to improve inventory control include:

- ✓ Manage all inventory at one central location.
- ✓ If materials have a limited shelf life, buy them in smaller containers instead of in bulk.
- ✓ Use "Just-In-Time" inventory control to reduce waste from expired and discontinued material.
- ✓ If you need or want to get rid of surplus usable materials, try free waste exchange programs such as the Industrial Materials Exchange in Seattle, at (206) 296-4899.
- ✓ Return surplus material to your supplier.
- ✓ Purchase materials in returnable containers or recycle the containers.

- ✓ Make sure your supplier allows return of damaged containers or products.

### Investigate Raw Material Modifications

If you use a hazardous product, look for a non-hazardous substitute. When you choose a safer substitute you provide safer working conditions, generate less hazardous waste, and reduce your liability. Many companies have successfully switched to safer paints without heavy metals and with lower volatile organic compound (VOC) emissions. Other facilities have switched to less hazardous non-chlorinated solvents.

### Prevent Spills and Leaks

Regularly maintain seals, update equipment, and monitor for leaks. Consider using double-wall containers, and installing flow meters, flood dams, volumetric measuring devices, and/or sensors for early leak detection. Add pressure relief valves, insulate and reinforce piping, and use drip pans.

Call a Toxics Reduction Specialist at your Ecology regional office for specific advice about your processes.

### 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

*Shoptalk* is produced quarterly by the Hazardous Waste and Toxics Reduction Program, Washington State Department of Ecology (360) 407-6740.  
E-mail address: [bmey461@ecy.wa.gov](mailto:bmey461@ecy.wa.gov)

Production Team: *Bonnie Meyer, Dave Zink, Cathy Bouge*  
Technical Editor: *Chipper Hervieux*  
Contributors: *Jean Rushing, Alice North, Jim Pearson, Bonnie Meyer, Chipper Hervieux, Iloba Odum, Jan Brydsen, Joan Morris*  
Distribution/Mailing List Changes: *Cathy Bouge*  
(360) 407-6719

*Shoptalk is run on an alcohol-free press using vegetable-based inks. Our paper has 50% recycled content, with 20% post-consumer waste.*

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

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