



*A quarterly publication for hazardous waste generators*

## One Plan Doesn't Fit All: Hazard Communication Plan vs Personnel Training Plan

If an Ecology Dangerous Waste Inspector visits your business, he or she will probably ask to see a copy of your Personnel Training Plan. If your impulse is to reach for your Hazard Communication Plan, you will be disappointed to learn that this plan doesn't meet the Dangerous Waste requirements. While these two plans are similar, they have very different purposes.

The Department of Labor and Industry's Hazard Communication Plan emphasizes products and informs employees of the health and safety risks of chemicals. It also informs employees of the types of protective clothing they need to wear to reduce their exposure to those risks.

The Personnel Training Plan described in the Dangerous Waste Regulations takes off where the Hazard Communication Plan ends. In the training plan, emphasis is placed on the wastes that are generated and how to minimize employee exposures and environmental risks. This plan describes how

employees will be trained to do their jobs in compliance with the Dangerous Waste Regulations.

While the Personnel Training Plan is a requirement for all large quantity generators, it makes good business sense for generators of all sizes. Training employees to comply with the regulations reduces your company's liability and can prevent costly accidents and injuries.

If you don't have a Personnel Training Plan, refer to the following steps to get started.

**Step 1:** Identify positions that handle dangerous waste. Include those positions that:

- ✓ Add or remove waste from containers
- ✓ Operate a recycling still or evaporator
- ✓ Transfer waste from one area or container to another
- ✓ Inspect dangerous waste accumulation areas
  - ✓ Label containers
  - ✓ Prepare waste for transport

**Step 2:** For each position identified, write job descriptions that include the dangerous waste activities that are performed in that position.

**Step 3:** Identify the relevant training needs for each position. The level of training needed depends on the tasks done by the worker, with Level III being the most extensive.

**Level I:**

- ✓ Adds or removes waste from containers

**Level II:**

- ✓ Operates a recycling still or evaporator
- ✓ Transfers waste from one area or container to another
- ✓ Inspects dangerous waste accumulation areas

**Level III:**

- ✓ Responds to emergencies

**Step 4:** Train employees to do their job in compliance with the Dangerous Waste Regulations.

**Step 5:** Document and keep training records.

Preparing a Personnel Training Plan is only the first step. It is important to follow through and make sure that your employees receive the appropriate training for their jobs. If you need information about available training courses, call Dave Zink at (360) 407-6752 and request a list of companies that provide Health and Safety Training.



*Students conduct a hands-on experiment to familiarize themselves with the characteristics of hazardous materials & wastes.*

*Training provided by  
CADRE, Inc. of  
Woodinville, WA*

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## Light at the End of the Tunnel- WA's Universal Waste Rule

Universal wastes are common wastes (batteries, for example) from businesses, institutions and households. They designate as a dangerous waste but can be managed under streamlined management rules. These rules are less stringent than the full dangerous waste regulations, but are still protective of human health and the environment.

Hazardous waste lamps are proposed to be included as Universal Waste. Hazardous waste lamps contain mercury and in some cases, lead. The Environmental Protection Agency (EPA) issued a new rule on the management of hazardous waste lamps, including fluorescent tubes and high intensity discharge lamps, on July 6, 1999. EPA ruled that these lamps can be managed as Universal Waste, effective January 6, 2000. Ecology is proposing to add hazardous waste lamps to its Universal Waste Rule. Currently, only batteries and mercury-containing thermostats can be managed as Universal Waste in Washington.

Handling hazardous waste lamps as Universal Waste will help to eliminate mercury and lead from municipal landfills and incinerators.

There will be two options for the ultimate management of the lamps as Universal Waste: (1) recycling or (2) treatment and disposal at a permitted facility. Generators will benefit by managing the lamps as Universal Waste because the lamps will not have to be manifested, the accumulation time limit will be longer, and regulated generators of the lamps will not have to count them towards their generator status.

The addition of hazardous waste lamps to Washington's Universal Waste rule is expected in April 2000. In the meantime, the interim policy for fluorescent tubes, dated January 26, 1995, is still in effect. If you have any questions, call Leslie Morris at (360) 407-6462.

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## Are You Storing Chemicals Safely?

Are you confused about how to properly store and manage your chemical products and wastes? Wouldn't it be great to have someone assist you in cleaning out excess chemicals from your storage room?

During the past year, Department of Ecology staff provided this type of technical assistance to 175 middle and high school science teachers across the state.

The free assistance included:

- ✓ Rearranging chemicals and wastes into compatible storage systems.
- ✓ Setting priorities for disposal of excess chemicals.
- ✓ Separating discarded chemicals into Department of Transportation (DOT) hazard classes for transportation and disposal.
- ✓ Educating teachers about managing dangerous wastes properly and better management practices in their laboratories.

In the end, the team found about 20 tons of chemicals in need of disposal.

Ecology can help your business learn to properly store and manage laboratory chemicals, too. Staff can also help you find less toxic chemicals or processes for your specific businesses. For more information call Camille Martin at (509) 456-6369.

### *Safe Chemical Storage:*

- ✓ *Keep acids away from bases.*
- ✓ *Keep oxidizers (nitric acid, nitrates, peroxides, chlorates) and organics away from inorganic reducing agents (metals).*
- ✓ *Keep flammables and corrosives in appropriate storage cabinets.*
- ✓ *Do not store paper or other combustibles near flammables.*
- ✓ *Use secondary containment and lipped shelving that is secured.*
- ✓ *Have a fire suppression system available.*

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## Energy Savings for Small Businesses

For small businesses, there are few corners that can be cut without sacrificing quality or service. Where can costs be cut? Well, it's simple. Save energy. THE ENERGY STAR® Small Business program provides FREE technical support and financial information to businesses that would like to cut costs through energy efficiency. These folks offer creative advice on energy-use via a hotline, 1-888-STAR YES, and a web site, [www.epa.gov/smallbiz](http://www.epa.gov/smallbiz).

At the website you'll find a "Tech Room," a "Financial Resource Directory," success stories, a list of partners, and a place to subscribe to the free electronic newsletter.

Inside the "Tech Room" you can download files that will help you get started on energy upgrades. If you need more information tailored to your situation, you can call the hotline. The Financial Resource Directory lists organizations that provide financial assistance.

You can also subscribe to the free newsletter. It will provide you with the latest news, tips, and advice on reducing energy costs.

A local source of technical assistance for energy conservation is the WSU Energy Extension Service. You can call them at (360) 956-2053.

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## Northwest Environmental Conference/Trade Show

The Northwest Environmental Conference will be held at the Jantzen Beach Double Tree Hotel, November 2-3, 1999. This year's conference will provide a broad spectrum of information on the latest environmental issues and an 8-hour Hazwoper Refresher course. The conference is presented by Associated Oregon Industries, American Electronics Association, Oregon Department of Environmental Quality, Northwest Environmental Business Council, and Department of Ecology.

For more information, call Ewe-Me and Company at (503)644-1222 or visit the website at <http://www.aoi.org/nwec/>

1999 Governor's Pollution Prevention Award Winners

Governor Gary Locke presented awards to the winners of the 1999 Governor's Award for Outstanding Achievement in Pollution Prevention on September 20, 1999, in a special ceremony in Olympia. "I applaud these organizations for working together with government to create partnerships for environmental protection," said Locke. "It is a real pleasure to participate in an award program where many of the achievements are the result of cooperation between the public and private sectors."

Winners were applauded for their successful efforts to prevent pollution by reducing the amount of hazardous substances used and the amount of dangerous waste generated.

The winners distinguished themselves by using innovative methods to ensure a clean environment for their employees and their community. Congratulations to these leaders:

- ☙ Apollo Spas, Spokane
- ☙ Birmingham Steel, Seattle
- ☙ Canyon Creek Cabinet, Monroe
- ☙ Eden Advanced Pest Technologies, Olympia
- ☙ Elliott Bay Marina, Seattle
- ☙ EnviroStars Cooperative, Seattle
- ☙ Hytek Finishes Company, Kent
- ☙ Omega Pest Management, Bremerton

If you would like to be included on a mailing list for this award program, email Cathy Bouge at [cbou461@ecy.wa.gov](mailto:cbou461@ecy.wa.gov).

1999 Governor's Award Winner Close-up: Apollo Spas

Apollo Spas, Spokane, used innovative pollution prevention and process changes to reduce its annual total pounds of styrene resin usage from 186,000 to slightly over 2,000 pounds. Styrene emissions to the air were reduced 99 percent. These improvements led them to be selected for the 1999 Governor's Award for Outstanding Achievement in Pollution Prevention.

In traditional spa manufacturing, sheets of acrylic are layered onto a mold and layers of resin and glass fibers are applied. After sufficient layers build up, the mold must cure for 24-30 hours.

During this time, styrene molecules link to form polystyrene, which provides strength. Styrene molecules are also released to the air, where they become a source of air pollution.

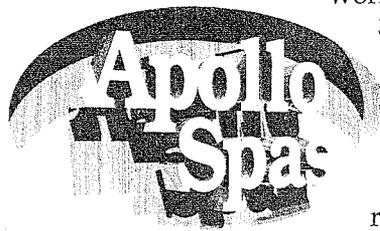
Apollo Spas began looking for ways to reduce styrene usage. They selected a system in which a large oven heats a sheet of ABS plastic and the heated sheet is rolled out over a mold. A vacuum is applied and the tub shape is formed and coated with resin layers.

Apollo Spas found a vendor with a resin formulation that uses urethane instead of styrene. This new resin has twice the tensile strength of the resin it replaced with half the layers required.

Owner Colin Taylor, who has worked in the industry for 30 years, says "It's a complete change in how we do business." Co-owner Steve McDonald says, "We have reduced curing time from 30 hours to 20 minutes. The product is six times better than the old product made in the traditional manner. The environment, the company, the workers and the community win with this system."

Although the transition hasn't been completely painless, the switch cost the company about \$200,000 and has taken nearly three years to fine-tune. The company expects to recoup its investment with quicker production time, reduced environmental compliance burden, and reduced overhead.

If you would like to know more about the success at Apollo Spas, call John Blunt at Ecology at (509) 456-6170.



Would you like to increase your company's profits by reducing the amount you spend to manage your waste? Would you like to reduce the amount of paper work that Ecology requires you to do? If the answer to either of these questions is "yes", then plan to attend one of Ecology's Generator Workshops in January and February of 2000. Learn how to:

- ☛ Achieve the benefits of lower generator status.
- ☛ Use a process called "designation" to identify the hazards associated with your wastes.
- ☛ Manage your waste properly.
- ☛ Complete your annual report quickly and correctly.
- ☛ Avoid common compliance violations.
- ☛ Minimize purchase of hazardous materials to avoid generating dangerous waste.
- ☛ Reduce waste to increase profits.

These all-day workshops are scheduled as follows:

DATE	LOCATION
January 4	Spokane
January 6	Yakima
January 11	Tacoma
January 13	Vancouver
January 19	SeaTac
January 20	SeaTac
January 25	Mt. Vernon
January 27	Silverdale

Come and get your questions answered in a casual, friendly atmosphere. The full-day training, lunch and a workbook are available for only \$40. Pre-registration is required; space is limited so register early. For information on how to register, call (360) 407-6718 or check Ecology's web site [www.wa.gov/ecology/hwtr](http://www.wa.gov/ecology/hwtr) for the most current workshop details.



**Q** When am I required to fill out Ecology's Notification of Dangerous Waste Activities (Form 2)?

**A** If you generate, transport, or receive regulated quantities (over 220 pounds monthly for most types of waste) of dangerous waste, you must notify the Washington State Department of Ecology of your activity. To do this, you need to file a Notification of Dangerous Waste Activities (Form 2) with Ecology.

After you submit the Form 2, your site will be given a RCRA Site ID number. You should notify Ecology of any changes to your company's name, mailing address, or ownership (using a Form 2 or Annual Report Verification Form - see next question). A Form 2 is required for changes in location or dangerous waste activities, such as if you become a transporter. Also, if your waste generating activities stop, or your company closes, you'll need to send in a Form 2 to cancel or withdraw the number.

Remember: your RCRA Site ID Number is assigned to a specific geographic location. So, if your company moves to a new location, you'll need to send in the following two notifications:

- 1. One form to apply for a RCRA Site ID number for the new location

2. A second form to cancel the old RCRA Site ID number. Form 2 can be downloaded from Ecology's web site [www.wa.gov/ecology/hwtr](http://www.wa.gov/ecology/hwtr).

**Q** Can my Dangerous Waste Annual Report Verification Form be used in place of the Form 2?

**A** Yes. Ecology will now allow you to report changes in your company's name, mailing address, and company ownership on your Dangerous Waste Annual Report Verification Form (VF) instead of requiring you to submit a Form 2.

This is a new policy which was introduced in order to reduce paperwork for generators and transporters since the VF collects the same basic information as the Form 2. This policy follows the efforts of the Environmental Protection Agency (EPA) to reduce the regulatory burden of paperwork. It is effective immediately and will be included in the next update of the State Dangerous Waste Regulations.

**Please note: ID number cancellations or withdrawals, and location and waste activity changes still require a Form 2.**

If you would like to receive Shop-talk by e-mail, send your e-mail address to Sonja Hutchinson at [sohu461@ecy.wa.gov](mailto:sohu461@ecy.wa.gov)

### 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

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

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