



Shoptalk

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 publication
 of the Solid and
 Hazardous Waste
 Program

Site Visits Available To "New Notifiers"

There is one thing about the hazardous waste regulations that everyone agrees on: they're hard to understand. So if you are a generator new to the "system" wondering what to do next or how to understand the hazardous waste rules, Ecology has the answer. (For a discussion of the "system" see the Spring 1991 issue of *Shoptalk*.)

Ecology has dedicated staff in each of its four regional offices across the state just to help these businesses learn how the regulations apply to them and how the system works. They're called "new notifier" inspectors, but they're really more like instructors who are ready and willing to visit and assist you.

Learn the Rules

Do I really want to call Ecology for an inspection? Yes. New notifier site visits are a great way for generators to learn the right way to manage their hazardous wastes. They can help you identify hazardous wastes, tell you if you're labeling containers and accumulating wastes correctly, and generally help you figure out if you're complying with the hazardous waste regulations.

Plus, these inspectors can put you in contact with Ecology's Hazardous Substance Information Office, your county's moderate risk waste coordinator, or the Waste Reduction, Recycling and Litter Control (WRRLC) Program—places where you can get

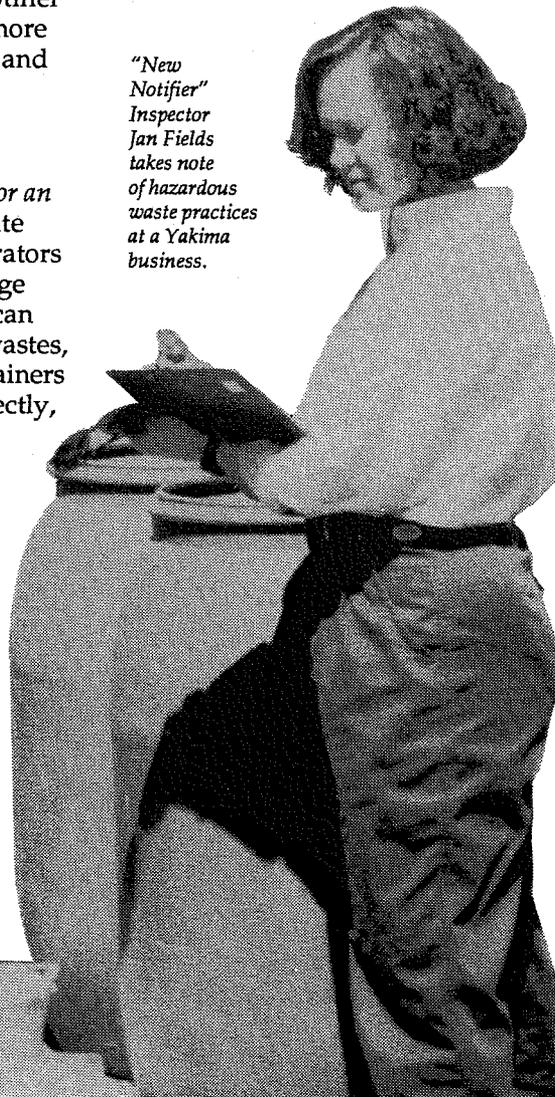
more
 information
 about

disposal options, waste reduction and recycling techniques, and education opportunities that may help save you money and help the environment.

Straight Talk

To get the most out of one of these visits, Ecology encourages you to show the inspector all of your waste processes and waste streams—even if you think you're doing something wrong. Remember, the emphasis is on education, not penalties. This is your chance to relax and learn the

"New Notifier" Inspector Jan Fields takes note of hazardous waste practices at a Yakima business.



rules. Ask questions, take notes and talk with the inspector—that's what they're there for. Afterward, you will receive a letter explaining the results of the visit.

Schedule a Visit

The first priority for Ecology's new notifier inspectors is to help businesses that recently received an EPA/State ID number. ID numbers are required for businesses that typically generate more than 220 pounds of hazardous waste per month (about one-half of a 55-gallon drum) and can be obtained by filling out a Form 2. Call (206) 459-6387 to request one.

If your business received an ID number within the last several months, an inspector will make an appointment to visit your business for a firsthand look at how you manage hazardous waste. If you received an ID number after January 1, 1991, and haven't heard from an Ecology new notifier inspector and would like a site visit, contact the inspector at your nearest regional office:

✓ Laurence Ashley Bellevue, (206) 649-7000

✓ Dave Saunders Tumwater, (206) 753-2353

✓ Jan Fields Yakima, (509) 575-2490

✓ Jan Brzoska Spokane, (509) 456-2926

Inside:

Waste Reduction Tips	2
CFC Update	2
Community Colleges	3
Fees Help Businesses	3
Fact Sheets Available	3
Questions and Answers	4

Are You in the Information Loop?

Staying current with rapid change is a challenge, especially when your business wants to start a waste reduction program. Learn how to save money and treat the environment right using resources available at little or no cost.

✓ **Talk to vendors.** You probably already rely on them for product and market information. Ask them for descriptive brochures, guide books, instruction manuals, or handouts about waste reduction, too.

✓ **Get involved with a trade association.** Review trade association newsletters for articles, trade shows, vendor fairs, and waste reduction workshops. To find a trade association, talk to others in your industry or call the **Business Assistance Center** at (206) 753-5632.

✓ **Find a workshop.** If your trade association doesn't know of a waste reduction workshop, ask them to sponsor one. Organizations such as the Washington Environmental Training Resource Center (1-800-562-0858), the Waste Information Network (206/684-2330 in Seattle, 509/456-5055 in Spokane), and Ecology's Waste Reduction, Recycling and Litter Control (WRRLC) Program present or sponsor such workshops.

✓ **Use your local library.** It's worth the effort. Scan the computerized periodicals index that lets you quickly scan magazine titles and articles and spot trends and innovations in your industry. Search your industry type, such as "painting," "drycleaning," etc., and general topics like "hazardous substances" or "hazardous waste." A series of related articles may indicate a hot new innovation or legal consideration. Magazines such as *American Paint and Coatings*, *Graphic Arts Monthly*, *Industry Week*, *Chemical Week*, *Occupational Hazards*, *Safety and Health*, *Iron Age*, *Road and Truck*, *Pulp & Paper*, *Oil & Gas*, and *Electronic Business* have published articles on hazardous substance issues in the past year.

✓ **Check out videos.** Use videos to educate yourself or to help in employee training. Videos designed to provide waste reduction ideas and share success stories can be powerful motivators. Follow the showing of a video with specific information about your facility and a discussion of ideas for pollution prevention. You can borrow a copy of any of the videos below by contacting Denise Christianson at (206) 438-7585.

- **Hazardous Waste Reduction: It's Your Business** discusses the steps needed to begin dealing with waste responsibly by highlighting several businesses that have been successful in minimizing their wastes and saving money. The video's fast pace and humorous tone have made it popular as part of employee training programs for businesses and public agencies (8 minutes).

- **Pollution Prevention: Reducing Waste in the Workplace** introduces specific techniques that supervisors and employees can use to reduce waste generation. It identifies sources of waste and shows simple, low-cost steps that will enhance production and decrease pollution in a variety of industries (23 minutes).

- **Pollution Prevention: The Bottom Line** presents corporate examples of waste prevention practices that save money; it's an excellent tool for companies beginning a pollution prevention program or seeking to increase public awareness of an existing program (24 minutes).

Request waste reduction and recycling publications, fact sheets, how-to manuals and success tips from Ecology by calling 1-800-RECYCLE. For waste reduction technical assistance, call your nearest regional Ecology office.

CFCs Are Regulated

If you repair air conditioners or refrigeration units, you know that over time, chlorofluorocarbon (CFC) refrigerants become contaminated and unusable without some type of reclamation.

Most generators, however, are not aware that spent CFCs are subject to regulation in Washington as hazardous waste. CFCs are regulated as hazardous waste from the time they become "spent" (for example, when service to the air conditioner begins) to the time they are reclaimed or recycled. Evaporating or venting spent refrigerants to the air is illegal and subject to enforcement action by Ecology.

Upcoming federal and state CFC requirements under Air Program laws will affect businesses. Federal air law beginning January 1, 1992, requires:

✓ shops and personnel performing more than 100 air conditioning repairs per year to recycle refrigerants and become trained and certified using proper equipment. Proof must be provided to EPA; and

✓ suppliers of CFCs to restrict sales to only those businesses with proper credentials.

State air law beginning July 1, 1992, requires:

✓ all businesses in Washington that repair or dispose of any unit containing CFCs to capture and recycle the CFCs; and

✓ the sale of CFCs in containers designed for consumer recharge of motor vehicle air conditioners be prohibited.

Call your nearest Ecology regional office for more information about hazardous waste management requirements; Ecology's Air Program in Lacey about new state air legislation requirements (206) 493-9362; or EPA Region 10 in Seattle about federal requirements (206) 553-0205.

Community Colleges Gear Up

Businesses are impacted by environmental regulations every day. Where can they go to learn what they need to comply? Community colleges across the state may be the answer. They've worked with business and industry in their area to put together hazardous materials ("hazmat") management courses tailored to reflect the regulatory needs of the local area. Hazmat courses offer a wide range of options:

- ✓ **small businesses** have an inexpensive way to send one or two employees to learn about a particular subject that affects their business, like hazardous waste storage requirements, safety and transportation, or health effects and industrial hygiene;
- ✓ **medium-size companies** that are impacted by multiple regulations but can't afford a full time environmental hazardous waste specialist can send different employees to specific courses that help them do their job better;
- ✓ **large companies** can benefit by hiring graduates from the two-year hazmat degree programs at a number of community colleges statewide.

Community colleges may also offer seminars for managers and

one-day workshops offering professional certification. Each college is unique in its approach, but all focus on the needs of businesses and students, including convenience (most courses are held in the evening) and affordability (a typical quarter-long course costs between \$180 and \$300).

If you have any questions about a hazmat program near you, call your local community college or Chadrick Morse, Green River Community College, at (206) 833-9111 ext. 757.

Fact Sheets Available Soon

If you liked the *Hazardous Waste Checklist* in the first issue of *Shoptalk*, then Ecology has good news.

New, easy-to-read fact sheets designed to help businesses comply with the regulations will be available beginning in mid-August 1991. Some of the specific industries addressed include auto repair, dry cleaners, pesticide applicators, photofinishers, electroplaters and printing and graphic arts. To request fact sheets, fill out and mail the order sheet to the address below.

Fees "Returned" to Businesses

All businesses in Washington that generate hazardous waste pay an annual \$35 Hazardous Waste Education fee. What is done with this money? The fees are used by Ecology to provide technical assistance and compliance education, either directly or through grants to counties and cities, to businesses who generate small quantities of hazardous waste.

To learn more, contact your county or city health, planning or public works department, or the Ecology moderate risk waste coordinator in the regional office nearest you.

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 regional office and ask for a hazardous waste specialist.

Bellevue: (206) 649-7000
Tumwater: (206) 753-2353
Yakima: (509) 575-2490
Spokane: (509) 456-2926

Please tear along perforation, insert in an envelope, stamp and send to:

Washington State Department of Ecology; Solid and Hazardous Waste Program; Mail Stop PV - 11; Olympia, WA 98504-8711

Listed below are the available fact sheets:

✓ *Hazardous Waste: More Common Than You Think* answers the basic question "Do I Generate Hazardous Waste?" Typical businesses types, common hazardous wastes and where to go for more information are discussed

✓ *Basic Do's and Don'ts* for hazardous wastes common to:

- automotive repair
- photofinishing
- dry cleaning
- electroplating
- printing and graphic arts
- pesticide application

✓ *Hazardous Waste Generator Checklist* summarizes the regulatory responsibilities of a hazardous waste generator

✓ *Checklist Fact Sheets* describe each section of the Checklist:

- #1: identify your waste and generator requirements
- #2: obtain an EPA/State ID number
- #3: report annually
- #4: perform preventive maintenance
- #5: properly accumulate hazardous waste
- #6: plan for emergencies
- #7: use proper containers and correctly manage them
- #8: arrange for proper transportation and disposal
- #9: manifest shipments of hazardous waste
- 10: keep records of hazardous waste activity

✓ *Services Directory* to help you find waste haulers, laboratories, recyclers and other services

✓ *Glossary* of key hazardous waste terms

✓ *Subject Index* provides you with references, contacts and other materials available for many of your hazardous waste questions

Send me the entire packet for my industry (circle one of the industries under Basic Do's and Don'ts).

Send me only the individual fact sheets that I've circled.

Questions and Answers

Q What should I do with my dirty shop rags?

A Solvent-soiled paper and cloth shop rags are typically regulated as hazardous waste. Draft guidance issued by Ecology holds that it's best to have such cloth shop rags laundered, but they need to be managed as hazardous waste up to the point they are washed. This means keeping them in closed containers, identifying the solvent(s) that contaminated them, keeping track of the amount you have and how long they've been on-site (and manifesting, transporting, recordkeeping, etc. for regulated generators). Excess solvent should be removed from rags prior to laundering by wringing or centrifugation.

The guidance suggests laundering only at a facility that meets Ecology's permit-by-rule requirement and has a wastewater pretreatment permit. If you choose to dispose of solvent-soiled rags instead, send them to a permitted hazardous waste management facility.

To receive a copy of this draft guidance, call Patricia Holler at (206) 459-6597. Comments are encouraged and should be received by August 9, or as soon as possible thereafter.

Q How much can I rely on my vendor in making waste management choices?

A It depends. You should do your homework—remember that the liability for hazardous wastes that you generate stays with you even after your wastes are picked up and gone. Pay attention to out-of-state vendors who say a waste is not hazardous—it may not be hazardous in their state but actually be regulated as hazardous in Washington. Watch out for half truths; for example, some citrus-based solvents advertised as non-hazardous in fact still have enough petroleum products in them to designate as hazardous waste. To check or confirm regulatory advice provided by a vendor, call a hazardous waste specialist at your nearest regional office.

Q Where do I get hazardous waste labels and manifest forms?

A Neither Ecology nor EPA supplies hazardous waste labels or manifest forms. To find hazardous waste labels, look in the Yellow Pages under "safety equipment" for companies such as:

✓ *Rice Safety Equipment*, Seattle, WA
1-800-326-8314 or Spokane, WA
1-800-541-8684

✓ *Safety and Supply*, Seattle, WA
(206) 762-8500 or Spokane, WA
(509) 534-0661

Some known suppliers of manifest forms are:

✓ *Ness Press & Design*, Olympia, WA
(206) 352-8123

✓ *Labelmaster*, Chicago, IL
1-800-621-5808

Q I live in a rural area and have trouble getting a transporter for my waste. Any suggestions?

A If you join together with other businesses nearby that have similar wastes, you'll probably find that the total volume of your wastes make it worthwhile for transporter pick-up. Remember—competitors can organize! Why not meet regularly to talk about how to understand and comply with the regulations?

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Shoptalk welcomes your questions and comments. Please address them to:

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