



Pollution Prevention Planning

Request for Inactive Status

What is Inactive Status?

Facilities required to report hazardous substances to the United States Environmental Protection Agency (USEPA) [Toxics Release Inventory](#) (TRI) are often required to develop and submit [Pollution Prevention Plans](#) to the Washington State Department of Ecology (Ecology). Some of these facilities may be exempted from the planning requirement if there are no feasible opportunities to replace or reduce the hazardous substances of concern and they generate less than 2,640 pounds of dangerous waste per year. Facilities that qualify for exemption are said to be in *inactive status*.

Facilities may remain inactive until feasible alternatives become available that allows the removal or reduction in use of TRI hazardous substances. Ecology staff review the status of inactive planning facilities at scheduled intervals and if viable alternatives have become available may reactivate the planning requirements.

How Do I Request Inactive Status?

Fill out this form. The amount of information you need to submit will depend on the size and complexity of your facility. Guidance and examples for answers are provided in gray shading.

You may electronically submit the completed form with a cover letter requesting inactive status to your regional Toxics Reduction contact staff. Or you may submit the form and cover letter to the appropriate contact staff at an Ecology regional office in your area (see addresses below). Ecology will review the information and make a determination of eligibility for inactive status. You may be called for clarification or more information and a site visit may be required. You will be notified of the final decision in writing.

Central Regional Office
15 W Yakima Ave #200
Yakima WA 98902-3452
509-575-2490

Eastern Regional Office
4601 N Monroe
Spokane WA 99205-5301
509-329-2400

Northwest Regional Office
3190 160th Ave SE
Bellevue WA 98008-5452
425-649-7000

Southwest Regional Office
PO Box 47775
Olympia WA 98504-7775
360-407-6300

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Sample Application

Use the guidance in gray shading when filling out the form.

Please note: the example answers used below are to help you understand the type of information we are looking for and should not be construed as answers that would automatically result in approval.

Hazardous substance reported to TRI:	<i>Example: Mercury</i>	<i>Another example: TCE</i>
Source of hazardous substance:	<i>Example: Coal supply</i>	<i>Another example: Cleaning solvent</i>
Concentration of hazardous substance in source material:	<i>Example: 1000 ppm</i> <i>Another example: 30% - based on a sample from 2005</i>	

1. Using the table below, list the total amounts of the basic raw material or fuels that contain this hazardous substance and the total hazardous substance used for the last three years. (Specify pounds, tons, gallons, etc.)

	Year 1	Year 2	Year 3
Total basic raw material used	<i>Ex. 10,000 lbs</i>	<i>Ex. 12,000 lbs</i>	<i>Ex. 14,000 lbs</i>
Total hazardous substance used	<i>Ex. 10 lbs</i>	<i>Ex. 12 lbs</i>	<i>Ex. 14 lbs</i>

2. What purpose does this hazardous substance serve? Be specific.

Examples:

Our fabrication shop receives a steel alloy containing manganese, which is added to make the steel easier to form or to increase strength. Our customers specify the steel alloy they want. Without steel we are out of business.

Mercury is a naturally-occurring element in the coal we use as fuel for producing cement. The mercury is not a necessary constituent in our process.

We process potatoes and use ammonia in our refrigeration system.

3. What have you done to research alternative basic materials or fuels that do not contain the hazardous substance and how feasible would it be to implement the alternatives?

Examples:

We manufacture airplane wing parts with aluminum and 3% copper alloy. We researched other alternatives, but current aerospace safety standards require the 3% copper for tensile strength, reduced wing weight, and resistance to corrosion. However, we recycle all of our scrap metal.

We have evaluated phosphoric acid (removed from TRI reporting requirements in 2001) as an alternative for the nitric acid, but we learned that aqueous phosphoric acid waste water is detrimental to the health of our local publicly owned treatment works (POTW) treatment system. Aqueous nitric acid wastewater apparently is more beneficial and preferred by the POTW. We also tried other potential non-hazardous substances accepted in the food industry, along with reusing the rinse water but none have performed well enough to meet our sanitation standards.

There are other fuel sources available: diesel, natural gas, and electricity. Since our source of coal is local the cost is low compared to the other fuel sources. Quite simply it is economically beneficial for us to use coal to help keep the cost of our products low and stay competitive in the market.

Another refrigerant would greatly increase our costs and would require a complete retrofit of our cooling system.

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4. Describe efforts your company has made to prevent or reduce the release of this hazardous substance to the environment.

Examples:

After our airplane wing parts made of aluminum copper alloy are computer numeric controlled (CNC) machined, we recycle all metal shavings for which we receive top dollar. Recycled metal is valuable. Due to the high value of this material, none of it gets into the environment.

In addition, this facility automated and implemented cleaning-in-place procedures that have reduced the use of nitric acid, minimized the amount of cleaning needed, and reduced the amount of waste water generated. The waste water is directly discharged to the local POTW and must meet water quality discharge limits prescribed in our Ecology State Waste Discharge Permit. This facility is in compliance with the parameters of the permit.

Our primary concern with mercury is reducing releases to the environment via emissions from our stacks. We maintain the stack scrubbers to assure they are meeting efficiency standards. In addition, this facility is permitted and monitors emissions as prescribed by an Air Quality permit.

Energy-saving retrofits to the cooling system, plus regular maintenance minimizes loss or releases to the environment.

If you need this document in a format for the visually impaired, call the Hazardous Waste and Toxics Reduction Program at 360-407-6700. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.