



Shoptalk

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of the Solid and
Hazardous Waste
Program

Paint: A Common Waste Stream

From the aerospace industry applying coatings to airplanes, to the home owner painting a deck chair — millions of gallons of paint are used each year in Washington. Significant strides have been made to reduce environmentally damaging products and practices — the development of latex paints and phase out of CFC propellants are two examples. However, paint and paint wastes are still finding their way to landfills, down drains, or evaporating.

Reasons for Concern

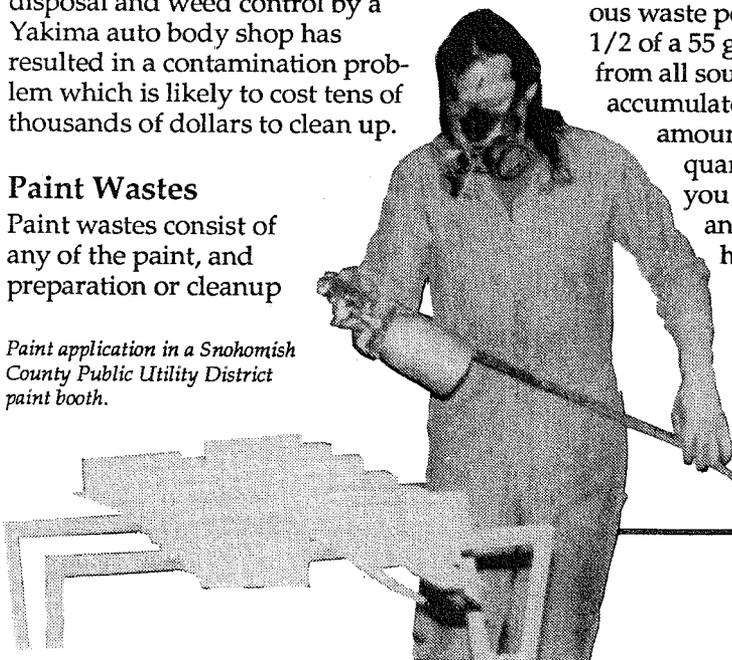
Paints, lacquers, solvents and clean-up wastes may contain ingredients that are flammable, toxic or cancer-causing. Many oil-based paints, for example, contain pigments, drying and fixing agents that contain heavy metals and solvents. While much safer than oil based products, latex paints may contain mercury and lead. When not properly handled and disposed of, paint waste can seriously degrade air, soil, ground and surface waters.

An example: dumping paint waste and solvents on the ground for disposal and weed control by a Yakima auto body shop has resulted in a contamination problem which is likely to cost tens of thousands of dollars to clean up.

Paint Wastes

Paint wastes consist of any of the paint, and preparation or cleanup

Paint application in a Snohomish County Public Utility District paint booth.



materials which are to be recycled or discarded, and can include anything from sand blast grit created when removing old coatings to solvents used in clean up of equipment and "empty" paint cans. Some of these wastes can pose a threat to worker safety, public health and the environment and require special attention.

Do Hazardous Waste Regulations Apply?

Determining how to apply hazardous waste regulations (Ch. 173-303 WAC) involves considering these two questions: *does the waste contain hazardous ingredients?* and *how much waste is there?*

Determining if your waste contains hazardous ingredients and how these ingredients pose a threat (designation) can be a complex process, but most oil-based paints, solvents and lacquers will designate simply because they are ignitable (will ignite at 140 degrees F). See the Q/A about designation on page 4.

In general, you are considered a small quantity generator if you generate less than 220 pounds of hazardous waste per month (about 1/2 of a 55 gallon drum) from all sources and don't accumulate more than that amount. As a small quantity generator you must designate and properly handle hazardous waste according to your county's hazardous waste plan. If you do this then you are exempt from most of the paper-

work and reporting requirements in the hazardous waste regulations.

If the total of all the hazardous waste you generate is more than 220 pounds or you accumulate more than 220 pounds then you are a regulated generator and the hazardous waste regulations apply. Contact your nearest Ecology regional office (phone numbers are on page 3) for information on how to notify and what requirements apply to you.

Who is the Generator?

Sometimes the question arises about who is responsible for complying with the hazardous waste regulations when several businesses are involved on a project. If the painting occurs on your site of business, you are considered the waste "generator." However, contractors are still responsible for properly managing wastes they produce in the course of doing business.

Waste Reduction & Recycling

There are many advantages to using waste reduction and recycling techniques. A short list includes reducing your liability and costs for waste handling and disposal. By recycling you can reuse expensive materials and qualify for reduced hazardous waste planning fees (see Winter '92 Shoptalk). See "Reduce Paint Waste" on page 2 for more on waste reduction and recycling.

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Reduce Paint Waste

So you're a painter and you have leftover paint and some waste from cleanup. Some of it could be hazardous! How can you avoid potential problems and reduce the amount of hazardous waste you generate? Here are some tips for dealing with latex (water-based) and oil (solvent-based) leftover paint and cleanup waste.

Substitute

When using paint on a project, the first thing to consider is: Am I using the least hazardous substance to do the job? A water-based paint is much safer and easier to handle, apply, clean-up, and dispose of than a solvent-based paint. Paint suppliers can help select water-based paints for many applications.

Reduce

Buy smart, don't over-buy! Calculate how much you need, as accurately as possible. Your distributor can help size the project. Not only will you use less resources and generate less waste, you will save money too.

Apply the paint efficiently.

Specific equipment is available to improve efficiency. Your supplier can help identify the best piece of equipment for your specific application.

Reuse

Use up the paint on the project for which it was purchased or save it for the next project — if not as a finish coat, then as a primer coat. Give leftover paint away to someone who will use it. Community groups may be looking for free paint, but please don't drop it off without contacting them first.

Recycle

Certain manufacturers may be willing to take back the leftover paint. This option is usually only

possible with unopened containers, however, you won't know unless you ask. Community wide paint recycling projects in the Puget Sound Region are currently in the planning stages. If you have leftover paint which may be recyclable and would like to show support for a recycling program in your community, please contact your regional Ecology moderate risk waste coordinator. You can reach your regional moderate risk waste coordinator by calling the nearest Ecology office. Phone numbers are listed in the "Remember" section on page 3.

Cleanup

The waste generated during cleanup can be reduced significantly by following some simple steps. For most application processes, the initial removal of contaminants and solids can be done in a "first" wash bucket. A second bucket is then used for further cleaning. The dirty wash water from the "first" wash bucket should be reused as long as possible.

For cleaning up solvent based paint, let the paint solids settle to the bottom and reuse the solvent wash. If you are still generating large volumes of waste solvent, you may be able to recycle the solvent with a distillation unit (still). Remember, the residual solids from the bottom of the still will designate as a hazardous waste which requires disposal through a hazardous waste management company.

Mishandling paint waste can cause significant environmental and health damage. For example, the compounds normally found in paint can affect aquatic life and potentially contaminate our drinking water. We encourage you to follow these safe procedures for handling paint waste. Call Ecology's 1-800-RECYCLE for additional information.

Ecology Gears Up For Automotive Campaign

With thousands of hazardous waste generators statewide, it is difficult to reach each with a detailed message about the importance of regulatory compliance. So, Ecology's Hazardous Waste Program is trying a new approach. Ecology is piloting a "single industry" campaign, emphasizing education, which targets one high priority industry at a time. The automotive repair industry is first because of the large number of businesses statewide and types of hazardous waste generated. The goal of the campaign is for Ecology to better understand the day-to-day realities of waste management in auto repair shops and for auto repair shops, in turn, to understand what it takes to comply with the regulations.

The automotive campaign started in January and will run for about a year. There will be three main phases:

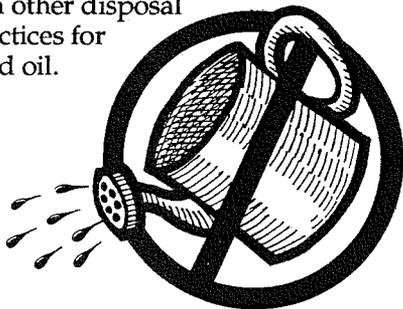
A joint Ecology/Automotive Industry work group has been formed to discuss the waste management concerns of both groups.

Ecology, in conjunction with automotive associations, will work with particular automotive business types (such as service stations, radiator shops, and general repair) to create special education packets for each business type.

The education packets will be distributed to auto repair shops this summer during site visits called "shop sweeps". These brief, 45 minute audits will be educational in nature rather than enforcement oriented. They are designed to show repair shops how to manage their wastes in compliance with hazardous waste regulations and help shops become prepared for any future inspections.

Used Oil Disposal Prohibitions

Used oil has been disposed of in many undesirable ways: used for dust suppression on roads and driveways, or weed control along fence lines; poured on the ground out back, or into the ditch along the road; or, poured directly into streams or storm drains. It is already illegal to discharge used oil to surface waters. Now a new state law (Chapter 70.951 RCW) prohibits certain other disposal practices for used oil.



- ✓ **Effective January 1, 1992**
it is illegal to Apply used oil for dust suppression or weed control.
- ✓ **Effective July 1, 1992**
it will be illegal to sell or distribute absorbent-based oil collection kits which are intended for home use. The oil absorbed in these kits cannot be recycled.
- ✓ **Effective January 1, 1994**
it will be illegal to dispose of used oil in a solid waste landfill. Used oil must be delivered to a used oil collection center for recycling, treatment or disposal.
Even though the effective date for prohibiting disposal of used oil in land fills is in 1994, there are already state and local regulations which prohibit or restrict this practice.
So what *can* you do with used oil? Recycle! But be sure as you collect your used oil that you don't spoil it for recycling by mixing in other wastes.
To find out about used oil collection opportunities in your community call 1-800-RECYCLE.

Pesticide Applicators Visited

Approximately 125 (about 10%) of the commercial and public pesticide applicators in Washington will be contacted by Ecology in a pilot survey which is currently underway. Ecology's purpose is two-fold; to help applicators understand how the Dangerous Waste Regulations apply to their operations; and, help applicators find ways to better manage their wastes. The survey began last spring and will continue through this summer.

Pesticide application services being contacted for on-site visits include lawn and yard care, golf courses and parks, right-of-way, wood treatment, forestry, agriculture, and others.

Mismanagement of pesticide wastes can lead to serious health and environmental contamination problems. Over 100 hazardous waste cleanup sites statewide are believed or known to be caused by pesticides. Some of these began as small disposal areas but have evolved into Federal Superfund hazardous waste sites. The survey emphasizes various methods of pesticide waste reduction and management in order to help avoid the creation of more hazardous waste sites.

To request literature on pesticide waste management and regulation, or more information about the pesticide hazardous waste generators survey, contact these Solid and Hazardous Waste Program staff:

- ✓ **Spokane:** Viki Leuba
(509) 625-5179
- ✓ **Tumwater:** Jay Johnson
(206) 753-3028
- ✓ **Yakima:** Greg Schuler
(509) 454-4329
- ✓ **Bellevue:** Don Seeberger
(206) 649-7131
- ✓ **Olympia:** Dave Rountry
(206) 459-6283

New Guidance Document Available

A new guidance document is available to businesses recycling their hazardous waste.

Regulation of Hazardous Wastes Being Recycled explains how the Dangerous Waste Regulations (WAC 173-303) apply to wastes which are being recycled. To request a copy please write or call: *Ecology Publications*, PO Box 47600, Olympia, WA 98504-7600, Phone (206) 438-7472.

Governors Award for Pollution Prevention

Businesses and organizations which have demonstrated the value of pollution prevention are eligible to receive the 1992 *Governors Award for Outstanding Achievement in Pollution Prevention*. Winners in each of four categories (small, medium and large businesses, and government facilities) will be presented with a plaque from the Governor and will receive recognition in Ecology publications. The deadline for applications is 5/22/92. Applications are available by calling 1-800-RECYCLE.

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

Q I recently received a State/EPA ID number. What kind of hazardous waste records should I keep, and for how long?

A Regulated generators of hazardous waste should keep copies of Ecology Form 2's, Generator Annual Dangerous Waste Reports (Form 4's), Uniform Hazardous Waste Manifests, exception reports, land disposal certificates and notifications, inspection records, laboratory test results, spill logs, and on-site recycling records for a minimum of five years. Ecology recommends that generators save these records longer, if possible, as they can be useful when selling your property or answering questions about its history.

Many small quantity generators who do not have ID numbers use waste haulers. We advise them to save all receipts or bills of lading.

Shoptalk readers:

In order to reduce waste and keep postage costs down, we have recently removed a number of duplicate addresses from our mailing list.

If you are still receiving unwanted copies of *Shoptalk*, your address is incorrect, or if you have a large facility and need more than one copy, please let us know. In any case, return all the labels to *Shoptalk* (address below) with a note indicating the problem.

Q What do you mean when you say a generator must "designate" their waste?

A Designation is the procedure generators use to determine whether or not their waste is considered hazardous. Wastes are "designated" as hazardous based upon the hazardous qualities of the waste and concentrations of hazardous substances within the waste. These hazardous qualities include, among others, being ignitable, reactive, corrosive, toxic, or carcinogenic. Hazardous waste generators determine which "Dangerous Waste Numbers" (4 digit codes) apply to their waste and use these numbers on all paperwork associated with the management of their waste.

Designation is an important and complex part of complying with the rules and is outlined in WAC 173-303-070. The fact sheet titled *1 - Identify Your Waste and Generator Requirements* provides a more detailed explanation of designation. This fact sheet is available from the Ecology Publications Office, phone number (206) 438-7472. Regional Ecology hazardous waste staff can also answer questions and send you helpful materials. Hazardous waste transporters and operators of waste management facilities will often help their customers identify hazardous wastes. Your trade association may be another source of information.

Q I recently paid a \$35 Hazardous Waste Education Fee to the Department of Revenue. What is the purpose of the fee, and how do I benefit?

A Ecology uses the fees to provide technical assistance and compliance education on hazardous waste management and waste reduction to small businesses throughout Washington state. This assistance is provided either directly to the business by Ecology or by returning money to counties to implement programs to help small businesses. These include developing written material, holding workshops, providing advice on local compliance issues, on-site consultations for businesses, and establishing collection sites for selected small business waste streams.

Shoptalk

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

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