



# Shoptalk

Dangerous Waste & Pollution Prevention  
Newsletter

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## Accommodation Requests

To request ADA accommodation, including materials in a format for the visually impaired, call Ecology at 360-407-6700 or visit [ecology.wa.gov/accessibility](http://ecology.wa.gov/accessibility). People with impaired hearing may call Washington Relay service at 711. People with speech disability may call TTY at 877-833-6341.

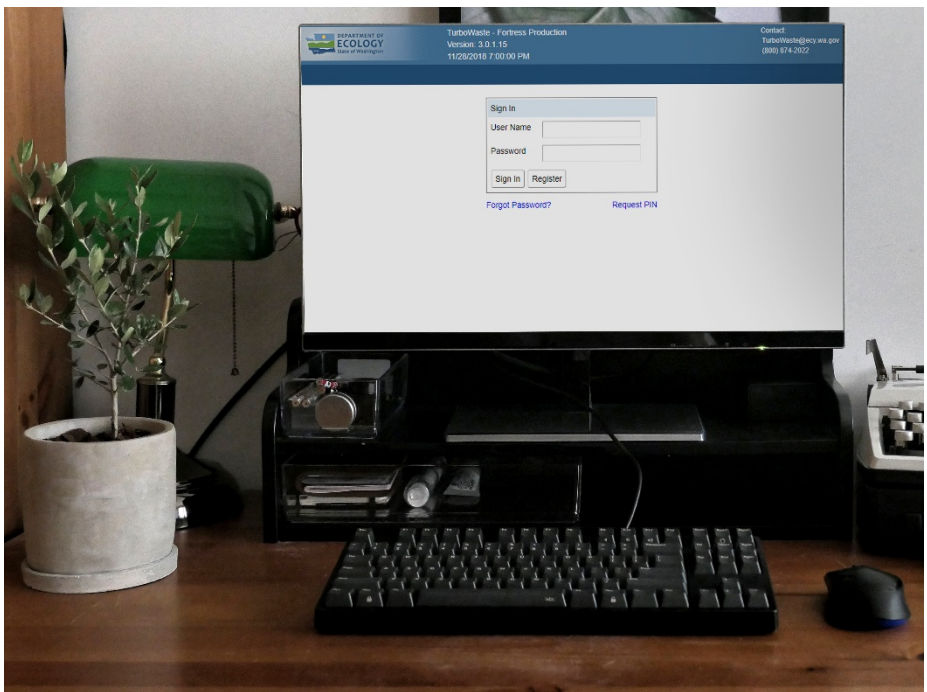
## Reporting season is here—and so is the new TurboWaste

*By Shawna Griffin*

Reporting season is here—and that means it’s time to submit your Dangerous Waste Annual Report. This year we rebuilt TurboWaste to make it easier for you to submit reports. You may notice a new look and feel, and we think you will find it easier to navigate the reporting process.

### Different forms and fields

We simplified and updated our forms to meet new requirements. You may notice that we added some fields, took some out, and rearranged some of the existing sections.



## Hazardous Waste & Toxics Reduction Program

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Read the new forms carefully—we've added questions that may apply to your facility. We explain each of the new questions in [the annual reporting guide](#) and in the help links within TurboWaste.

### Changes to the dangerous waste notification form

Updates to the notification form add requirements depending on the activities at your site.

Make sure to indicate these on your site identification forms if they apply:

- Received dangerous waste from off site.
- Acted as a recognized trader.
- Acted as a manifest broker.
- Imported or exported spent lead acid batteries.

We are here to help—call us if you have questions.

### Changes for large quantity generators

If you are a large quantity generator (LQG), you will not need your electronic signature account for 2018 dangerous waste annual reports. Please use [TurboWaste<sup>1</sup>](#) to submit your report.

In previous years, LQGs had to submit their dangerous waste annual reports using their electronic signature account (also known as the HWTR signing portal or the cross media electronic reporting rule, CROMERR).

This year LQGs don't need to go through that process. There will be a different process for 2019 annual reports—stay tuned for more information.

### How to get help

#### Dangerous Waste Annual Report and Notification Help

- 800-874-2022
- [turbowaste@ecy.wa.gov](mailto:turbowaste@ecy.wa.gov)

#### Dangerous waste compliance help

If you need help with compliance, [contact your regional office.](#)<sup>2</sup>

### Due dates

**Dangerous Waste Annual Reports are due March 1.** Beginning January 1 you can go into TurboWaste and start submitting reports.

### Tell us how we are doing

Submit TurboWaste feedback to [turbowaste@ecy.wa.gov](mailto:turbowaste@ecy.wa.gov). We'd like to hear how the system does or doesn't work for you so we can continue to improve.

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<sup>1</sup> <https://fortress.wa.gov/ecy/turbowaste/SignIn.aspx>

<sup>2</sup> <https://ecology.wa.gov/About-us/Get-to-know-us/Contact-us/Regional-contacts>

## What’s my federal generator status?

By Erin Jesky

As you file your dangerous waste annual report this year, you’ll need to determine your federal generator status—this is different than the generator status we use in Washington to determine your responsibilities under the dangerous waste regulations. It's possible that your state and federal statuses will be different. Once you log into TurboWaste to submit your report, you will need to enter both generator statuses.

### State

In Washington, generators are either an SQG (small quantity generator), MQG (medium quantity generator), or LQG (large quantity generator). [Learn more about these generator categories.](#)<sup>3</sup> If you are an XQG (no regulated waste generator) in Washington, you will automatically be an NQG (not a generator) in federal reporting terms.

### Federal

RCRA, the Resource Conservation and Recovery Act, divides generators into three slightly different categories. The generator thresholds don’t include Washington state-only waste.

To determine your federal generator status, consider the highest amount of waste you generated in any month during the reporting year, and compare it to the chart below.

Federal Generator Status	Non-acute RCRA hazardous waste	Acute RCRA hazardous waste
<b>Federal Large Quantity Generator (LQG)</b>	Generate 2,200 pounds (1,000 kilograms) or more.	Generate 2.2 pounds (1 kilogram) or more of wastes with these codes: all P codes,* F020, F021, F022, F023, F026, F027
<b>Federal Small Quantity Generator (SQG)</b>	Generate between 220 and 2,200 pounds (100-1000 kilograms).	There is no SQG status for acute RCRA hazardous waste. If you have more than 2.2 pounds in any month, you are an LQG.
<b>Federal Very Small Quantity Generator (VSQG)</b>	Generate 220 pounds (100 kilograms) or less.	Generate 2.2 pounds (1 kilogram) or less of wastes with these codes: all P codes,* F020, F021, F022, F023, F026, F027

Table 1: Federal generator status chart

\*Any residue or contaminated soil, water, or debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste listed in sections 261.31 or 261.33(e) has the same limits as in the *Non-acute* column.

<sup>3</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Dangerous-waste-basics/Generator-status>

# Changes to dangerous waste regulations

By Rob Rieck

On August 9, 2018, Ecology proposed amendments to the Dangerous Waste Regulations, Chapter 173-303 of the Washington Administrative Code (WAC). We expect to adopt new rules January 2019.

## What the rule changes include

The proposed revisions include recent changes to the federal hazardous waste regulations and changes initiated by the state. A major change is adoption of most parts of the federal Generator Improvements Rule. In response to public comments we received on the draft rules, Ecology made changes to the final rule, including but not limited to:

- Definitions for authorized representative and weekly inspections.
- Requirements for designation of unknown solid wastes discovered on the generator's site.
- Reporting waste episodic generation.
- Large quantity generator (LQG) contingency plan requirements for facilities with 24-hour emergency response capabilities.
- Requirements on lettering size of hazardous/dangerous waste labels and on hazard labels. An exception to this labeling rule is provided for containers 1 gallon (or 4 liters) and under.
- Clarifications on unclear language.

[Read more about this rulemaking process](#).<sup>4</sup> Also, [subscribe to our dangerous waste emails](#)<sup>5</sup> to stay updated on meetings and other dangerous waste rulemaking activity.

## Pharmaceutical waste rule not adopted

We had also intended to adopt dangerous waste pharmaceutical regulations similar to Environmental Protection Agency's (EPA) 2015 proposed hazardous waste pharmaceutical rule. We decided not to adopt those regulations at this time, since we discovered there could be significant changes between EPA's proposed rule and the final adopted regulations. We intend to restart our rulemaking process for this set of rules in the near future, since EPA has now adopted a final hazardous waste pharmaceutical rule.

## Rule adoption process

We accepted formal comments on the proposed changes August 9 through October 5. Ecology prepared a concise explanatory statement (CES) containing Ecology's response to comments and explaining how rule language changed between proposal and adoption. The CES will be available when we adopt these amendments. We held public hearings online on September 26 and in-person on September 28, at Ecology's Northwest Regional Office in Bellevue.

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<sup>4</sup> <https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC-173-303-Feb17>

<sup>5</sup> <http://listserv.ecology.wa.gov/scripts/wa-ECOLOGY.exe?SUBED1=DW-RULES&A=1>

## Generator improvements rule online training

By Rob Rieck

Overview of Chapter 173-303 WAC Amendments Webinar

March 20, 2019 | 10 a.m. – 12 p.m. PST

[Join the webinar online](#)<sup>6</sup>

Event Number: 803 549 071

Event Password: Ecology1

[Join the webinar via phone](#)

For audio only, call:

- 1-877-668-4493.
- Enter the access code.

**Access code:** 803 549 071

Toll-free [dialing restrictions \(pdf\)](#).<sup>7</sup>

We expect to adopt amendments to the dangerous waste regulations, chapter 173-303 WAC, January 30, 2019. We realize some generators need more time to come into compliance with the new rules, so we will extend the effective date to 90 days after adoption, around April 30, 2019.

Generators should expect to hear about:

- Major reorganization of the generator rules.
- Changes to tank and container labeling rules.
- Allowances for episodic generation.
- Another dangerous waste disposal option for small quantity generators.
- Electronic manifesting.
- An exemption for solvent-contaminated shop towels.
- Several other exciting topics.

Stay informed

Subscribe to our dangerous waste [rulemaking email list](#).<sup>8</sup>

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<sup>6</sup> <https://watech.webex.com/watech/onstage/g.php?MTID=ef873f247227ac5b1b7ab07c1ed6519e2>

<sup>7</sup> [http://www.webex.com/pdf/tollfree\\_restrictions.pdf](http://www.webex.com/pdf/tollfree_restrictions.pdf)

<sup>8</sup> <http://listserv.ecology.wa.gov/scripts/wa-ECOLOGY.exe?SUBED1=DW-RULES&A=1>



## Mercury switch removal program—going forward

By Jeffrey Gutschmidt

Since 2006 Washington's participation in the Mercury Switch Removal (MSR) program has prevented over 612 pounds of mercury from entering the environment. We're still calculating, but it looks like we collected 28 pounds of mercury or more in 2018. The program provides auto recyclers \$3 for each mercury switch or pellet they remove. Currently 175 auto recyclers in Washington participate.

Washington consistently outperforms many other states, leading the nation in mercury collections for 2016. Nationally the program collected over 92,000 pounds of mercury as of March 31, 2018.

### Extending the program

Even though vehicles manufactured after 2004 don't have mercury switches, years of collection work remain. Some unexpected factors have kept old cars on the road longer and delayed recyclers from processing them:

- Rebate systems for older cars.
- Mild winters.
- Fluctuations in the price of steel.
- The economic recession.

Our modeling predicts that enough mercury switches remain to be collected to justify extending our participation through 2021. Though Washington's MSR participation is slated to end in 2019, we are asking the legislature to extend it to 2021 (to match the federal program).



*Crushed cars from an auto recycling facility.*



*Mercury-containing ampule from an automotive mercury switch.*

### How did MSR start?

The MSR work resulted from a settlement between EPA, big automakers, and steel manufacturers. MSR helps meet National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements and mitigates pollution generating activities.

[Learn more about the Mercury Switch Removal Program.](https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Mercury/Automotive-mercury-switch-removal)<sup>9</sup>

<sup>9</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Mercury/Automotive-mercury-switch-removal>

# Pre-Impregnated Resin Composites Guidance and Interim Policy Now Available

By Erin Jesky

Ecology has new guidance and an Interim Policy for pre-impregnated composite fiber material (prepreg) waste. Prepreg is widely used in the advanced composite industry – most often in aircraft and aerospace sectors. It's also used in automotive and recreation industries.

The new guidance covers allowable practices and includes information about designating your prepreg wastes.

[Dangerous waste guidance of pre-impregnated resin composites](#)<sup>10</sup>

## Interim Policy

The Interim Policy for Prepreg Waste provides a conditional management and disposal option for oven-cured prepreg waste that is not a federal hazardous waste under 40 CFR part 261. You may choose to manage some or all of your prepreg waste under the [Dangerous Waste Regulations](#)<sup>11</sup> or under the [interim policy](#).<sup>12</sup>

If you manage prepreg under this policy, you can:

### Avoid

- State-only designation.
- Counting it toward your generator status.
- Reporting it on the dangerous waste annual report.
- Counting it toward pollution prevention planning and fees.

### Take advantage of

- A 180-day accumulation period for cured prepreg (instead of 90 days) for large quantity generators. The accumulation period starts once the quantity of cured prepreg exceeds 2,200 lbs.
- Disposal at solid waste landfills that meet Chapter 173-351 WAC requirements.
- Uniform Hazardous Waste Manifest not required.

You must follow all of the guidelines in the *Interim Policy for Prepreg Waste* to take advantage of these benefits.

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<sup>10</sup> <https://fortress.wa.gov/ecy/publications/SummaryPages/1804028>

<sup>11</sup> <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-303>

<sup>12</sup> <https://fortress.wa.gov/ecy/publications/SummaryPages/1804029>

### 2018 Safer Choice Partner of the Year Awards

By Saskia van Bergen

Congratulations to Pacific Lutheran University (PLU) and Local Hazardous Waste Management Program (LHWMP) for winning the [EPA Safer Choice 2018 Partner of the Year award](#).<sup>13</sup>

PLU's [webpage](#),<sup>14</sup> [video](#),<sup>15</sup> and other outreach projects earned them a spot on the award list. Because of their student-led efforts, the on-campus store only sells Safer Choice-certified products.

LHWMP's 2017 outreach efforts included educating the community about safer choice by handing out flyers, posters, and green chemistry cleaning kits.



### Upcoming green chemistry training opportunities

OSHA 7225 Transitioning to Safer Chemicals

April 30, 2019 - May 1, 2019, Seattle

September 5-6, 2019, Spokane

December 11-12, 2019, Seattle

[Register online](#)<sup>16</sup>

This course will guide participants through OSHA's substitution planning process for understanding and evaluating chemical use, identifying and assessing alternatives, and implementing safer alternatives. OSHA 7225 is for professionals at all levels of chemistry understanding who play a role in product and materials selection.

[Watch a recorded webinar about the training](#).<sup>17</sup>



<sup>13</sup> <https://www.epa.gov/saferchoice/safer-choice-partner-year-award-winners-2018>

<sup>14</sup> <http://plusaferchoice.com/>

<sup>15</sup> <http://plusaferchoice.com/bring-safer-choice-to-your-community/>

<sup>16</sup> <https://osha.washington.edu/osha/course/transitioning-safer-chemicals>

<sup>17</sup> <https://www.youtube.com/watch?v=Re-6YTR3ltg&index=11&list=PL8BmI4b96dKbkhgkrMrXS85VjNXprJdFv&t=3s>



## Hazardous Waste & Toxics Reduction Program

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### Green Chemistry Online Certificate Program

Graduates of this 3-course program will make a difference after learning to design safer chemicals and industrial processes. Today businesses face increasing market and regulatory pressures to use less toxic chemicals in their manufacturing processes and products. They need professionals who can provide innovative solutions and more sustainable substitutes.

**Program Dates:** September 23, 2018 - June 5, 2020

[Register for the three courses:](#)<sup>18</sup>

#### COURSE I: Sustainability, Toxicology, and Human Health

September 23, 2019 - December 6, 2019 | Cost: \$910 | CEUs: 5

Overview of fundamental principles of toxicology, human health, and material science. Participants will review their own business' sustainability drivers and barriers while investigating the health and environmental hazards that contribute to human disease.

#### COURSE II: Principles of Green Chemistry

January 6, 2020 - March 13, 2020 | Cost: \$910 | CEUs: 5

Fundamental principles of green chemistry, including the human and ecological reasons for considering less toxic alternatives and the various green applications to chemical design. Overview of new tools and cutting edge research for the design of 21st century chemicals that minimize hazards to health and the environment.

#### COURSE III: Assessment Tools for Safer Chemical Decisions

March 30, 2020 - June 5, 2020 | Cost: \$910 | CEUs: 5

Decision-making tools and methods used for comparative chemical hazard assessments. Participants will have an opportunity to use these tools through the completion of a culminating project.

## How can we make shoptalk better?

Let us know how we can improve by emailing [shoptalk@ecy.wa.gov](mailto:shoptalk@ecy.wa.gov).

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<sup>18</sup> [https://osha.washington.edu/pages/green-chemistry-chemical-stewardship-online-certificate-program?inf\\_contact\\_key=474edc155f620dfb17ef73a9c03836e6175e504f5759db6196b80bd4a4f2c6af#Registration](https://osha.washington.edu/pages/green-chemistry-chemical-stewardship-online-certificate-program?inf_contact_key=474edc155f620dfb17ef73a9c03836e6175e504f5759db6196b80bd4a4f2c6af#Registration)