



Shoptalk

Dangerous Waste & Pollution Prevention
Newsletter

WINTER 2020



TurboWaste is changing! Learn about the updates.

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Have questions about episodic waste? You're not alone.

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DEPARTMENT OF
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About Shoptalk



What is Shoptalk?

Shoptalk is a Washington State Department of Ecology publication. In this newsletter, we share articles to help Washington state businesses with dangerous waste compliance and pollution prevention.



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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. People with impaired hearing may call Washington Relay service at 711. People with speech disability may call TTY at 877-833-6341.

Shoptalk is back!

We have been on a bit of a hiatus for the last year ... but now we are back in action!

As we welcome in a new year, we've made the resolution to make Shoptalk the best that

it can be. Having said that, you might notice some changes in this issue. We think you'll like what we have in store for you this year. If you have thoughts, feedback, or ideas on how we can improve, [let us know!](#) ♦



Need help with reporting?

Important dates



Jan. 1: Start submitting your report in TurboWaste.



Mar. 1: Annual Reports are due.

Annual Report and notification help



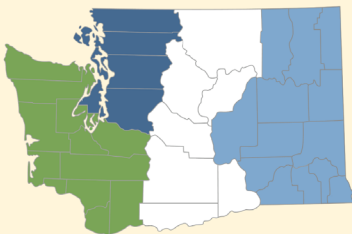
800-874-2022



turbowaste@ecy.wa.gov

Dangerous waste compliance help

For compliance help, contact your regional office:



ecology.wa.gov/regionaloffices

Reporting season has arrived—and that means it's time to submit your **Dangerous Waste Annual Report.**² This year, you may notice some changes to our online reporting tool, TurboWaste: we added new security and updated our forms.

Protecting your information

[SecureAccess Washington \(SAW\)](#)³ and the Electronic Signature Agreement (ESA) both add layers of security.

TurboWaste has a new home in SAW.

All dangerous waste reporters must apply for the TurboWaste service in SAW. If you are an existing SAW user, you can add this service to your account.

Electronic signatures are required.

All authorized representatives must submit an ESA. This applies to all generators submitting Dangerous Waste Annual Reports and notifications electronically.



New year, new TurboWaste

Gear up for GIR additions

We updated our forms to adhere to the new Generator Improvements Rule (GIR) additions. You will notice that form fields have changed in some sections. New

questions may apply to your facility. We explain each of the new questions in the annual reporting instructions and in the help links within TurboWaste.

How to get help

Check out our

instructions on how to [register for TurboWaste and get an ESA](#).⁴ We're here to help you be successful. Please email the Annual Report Team at turbowaste@ecy.wa.gov if you need help.



—Jeri Brining

Episodic generation

Sometimes you have a one-time event that causes your facility to generate more waste than usual. An event, or “episode,” like this may qualify under new rules that won’t cause your generator status to go up.

Here are some of the most frequently asked questions about the new [episodic generation rule](#):⁵

What is an episodic event?

An episodic event occurs when a waste event increases waste generation above your usual generator status. Only small quantity generators and medium quantity generators can notify of an episodic event. It must be due to an activity that doesn’t

occur as part of your typical waste generation (for example, a typical event may be an annual tank cleanout).

What types of episodic events are there?

There are two types of episodic events—planned and unplanned. Check out the infographic (right) to learn about these two types of events.

Whether your event is planned or unplanned, you must notify us of the event.

How do I notify Ecology of an episodic event?

For planned events:

Be sure to [notify us](#)⁶ after you have identified the project that will make the waste, but not after you have started to generate the waste.

Notify by submitting a pre-printed Site ID Form⁷ along with the Episodic Addendum⁸ at least 30 days before your first planned event. Your event must happen at least 30 days after we receive a complete notification—be sure to account for mail travel time and any changes that we might ask you to make.



Planned

vs

Unplanned

Non-routine tank cleanouts



Short-term construction or demolition projects



Removing excess chemical inventory



Equipment maintenance during plant shutdowns



Accidental spills



Product recalls



Production process upsets



Acts of nature like floods, earthquakes, or wildfires

For unplanned events:

If you have an unplanned event like a spill, notify our [Hazardous Waste regional staff](#)⁹ by fax or email within three days of the event, and follow up with a Site ID Form within 30 days.

Will an episodic event affect my generator status?

You can take steps to manage your episodic waste without affecting your generator status. Your generator status depends on the proper submittal of notifications

to Ecology. This status can remain the same; however, you may have to pay a pollution prevention fee and make a plan for reducing your waste in the future.

What do I do with waste from my episodic event?

Store episodic waste separately from the rest of your waste, and label it as “Episodic Dangerous Waste” or “Episodic Hazardous Waste.” Mark it with the date the episodic event began. Use a dangerous waste transporter to

send your episodic waste to a permitted treatment, storage, and disposal facility within 60 days of the event, regardless of your generator category.

Still have questions?

- Learn more in our recent publication, [Focus on: Episodic Generation](#).¹⁰
- [Email the Annual Report Team](#)¹¹ (or call at 1-800-874-2022) for help with your documents. ♦

—Ruth Froese and Eric McConnell

Is your contingency plan up to date? New requirements for large quantity generators aim to improve emergency response¹² at your business. All large quantity generators writing a new contingency plan, or amending the current one, must create a quick reference guide of the plan.

What's in a quick reference guide? Here are a few things you must include:

- Waste types, hazards, and estimated amounts of hazardous substances on site.
- A facility map of dangerous waste generation points, all satellite and central accumulation areas, and areas of waste treatment or recycling.
- A street map of the facility location that



Are you prepared for an emergency?

shows its proximity to surrounding businesses, schools, and residential areas.

- Emergency contact information with a 24-hour phone number.

You must share the quick reference guide, and any subsequent updates, with your state and local emergency responders. Keep a

record of the emergency responders' receipt of the contingency plan and quick reference guide. Remember, your contingency plan—and especially your quick reference guide—help emergency responders swiftly and safely resolve emergencies at your business. Help them help you. ♦

—Eric McConnell

Are your consolidation practices solid?

Small quantity generators may now send their dangerous waste to large quantity generators if both generators meet the specific requirements.¹³ **Both businesses must be under the control of the same person, not a third-party vendor, contractor, or consultant.**

The receiving business (large quantity generator) is responsible for notifying and recording this activity for both facilities.

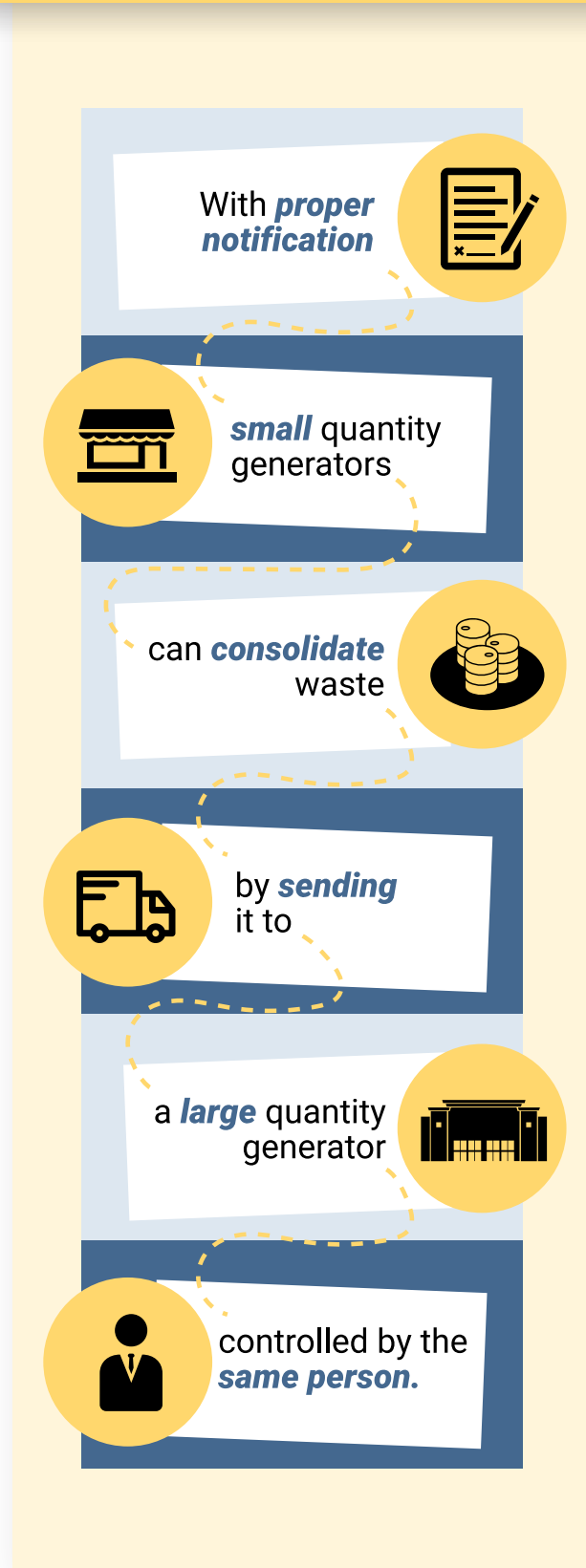
Notify us at least 30 days before the first shipment between facilities.

To manage your small quantity generator waste under large quantity consolidation, mail these forms to Ecology:

- A pre-printed Site ID form.¹⁴
- The [Consolidation Addendum](#).¹⁵

Before shipping, label all wastes. The 90-day accumulation date is applied by the large quantity generator once they receive the waste. The time limit starts when the waste arrives at the large quantity generator. The large quantity generator facility must keep records of all wastes received from their small quantity generator facilities. ♦

—Eric McConnell





Coming soon: Changes to dangerous waste pharmaceutical regulations

More changes to Washington's Dangerous Waste Regulations¹⁶ are in the works. These changes will incorporate new federal hazardous waste rules, including rules for pharmaceutical and

nicotine waste.¹⁷ EPA adopted new management standards for these wastes in early 2019. We plan to adopt some of these rules in fall of 2020.

Until the new management standards for pharmaceutical waste

take effect, our [Interim Pharmaceutical Waste Policy](#)¹⁸ will remain an option for healthcare facilities in Washington.

We hosted [a webinar](#)¹⁹ providing an early look at our proposed changes. We expect to release the official draft rule for comments this spring.

Give us feedback on the

Put a label on it

Do you know about the new rule changes²⁴ for labeling dangerous waste containers? If your business generates dangerous waste, be aware of these updates:²⁵

- Containers must be labeled as “Hazardous Waste” or “Dangerous Waste.” **Markings should be readable from 25 feet away or letters should be at least a half-inch tall.**
- Hazard markings must clearly indicate the hazards of the container’s contents (examples include flammable, corrosive, toxic, or reactive). **Markings should be readable from 25 feet away or letters should be at least a half-inch tall.**
- Containers one gallon (or four liters) and under can be marked with smaller print.

These rules are important to all facilities accumulating dangerous waste in containers. Different rules apply if you accumulate dangerous waste in tanks, containment buildings, or drip pads. To learn more about labeling, check out Focus on: Labeling Dangerous Waste.²⁶ ♦


—Eric McConnell



proposed rules²⁰ by sending us an email.²¹

For more information on the upcoming rulemaking, visit our FAQ webpage.²² You can also sign up for email updates²³ about this rulemaking. ♦

—Lauren Smith



The perks of PERC replacement

If your dry cleaning business uses perchloroethylene (PERC),²⁷ you could get up to \$20,000 from Ecology for switching to a safer alternative. We've teamed up with local governments to help Washington dry cleaners replace PERC equipment,²⁸ and financial support is key in helping businesses move
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away from this toxic chemical.

If you're interested in getting reimbursed, talk to one of our representatives before purchasing your new equipment. Here is what you can get for investing in new equipment:

- Up to \$20,000 for switching to professional wet cleaning.
- Up to \$10,000 for switching to hydrocarbon.

Who's making the switch?

There are roughly 100 Washington dry cleaners in the state still using PERC, and 46 of them are already making the switch. We visited each business still using PERC, and about two thirds of them showed interest in switching to a safer cleaning alternative.

Why be concerned about PERC?

PERC is a dry cleaning

solvent that has been popular since the 1960s. Today, we know PERC can cause cancer, and it degrades into more hazardous chemicals in the environment.

Because of this, many dry cleaning businesses became toxic cleanup sites.

PERC is regulated as a federal and state listed dangerous waste for its toxic properties.

Moving away from PERC will reduce the risk of future environmental contamination and make the dry cleaning workplace safer. Making the switch may also reduce your dangerous waste regulatory requirements.

This project is part of a larger Product Replacement Program approved by Washington's Legislature

in 2019. The program currently focuses on PERC and firefighting foam. It may expand incentives to include other priority chemicals and products.

Visit our [Replace PERC website](#)²⁹ to learn how to get started, or [email us](#)³⁰ to see if your business qualifies for reimbursement. ♦

—Jeffrey Wangsao

Why ditch PERC?



Get reimbursed.

Up to:
• \$20,000 for professional wet cleaning.
• \$10,000 for hydrocarbon.



Improve workplace health.

PERC is toxic and known to cause cancer.



Avoid a costly cleanup.

Eliminate your risk of spills to the environment.

Upcoming events and trainings



Conference

Northwest Chapter Hazardous Materials Management Conference

Where: Portland, OR
When: April 21–23, 2020



Conference

Green Chemistry & Engineering Conference

Where: Seattle, WA
When: June 16–18, 2020



Training

Online Green Chemistry & Chemical Stewardship Program

Where: Anywhere
When: Sept. 28, 2020 –
June 4, 2021

Endnotes

- 1 shoptalk@ecy.wa.gov
- 2 <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Dangerous-waste-reporting-requirements/Dangerous-Waste-Annual-Report>
- 3 <https://secureaccess.wa.gov/myAccess/saw/logout.do>
- 4 <https://apps.ecology.wa.gov/publications/SummaryPages/1904017.html>
- 5 <https://apps.leg.wa.gov/wac/default.aspx?cite=173-303-173>
- 6 <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Dangerous-waste-reporting-requirements/Notification-of-Dangerous-Waste>
- 7 The pre-printed Site ID form can be found on your TurboWaste account page. If you don't have access to TurboWaste, contact the Annual Report Team.
- 8 <https://apps.ecology.wa.gov/publications/SummaryPages/ecy070602.html>
- 9 <https://ecology.wa.gov/About-us/Get-to-know-us/Contact-us>
- 10 <https://apps.ecology.wa.gov/publications/SummaryPages/1904019.html>
- 11 turbowaste@ecy.wa.gov
- 12 <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-201>
- 13 <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-200>
- 14 The pre-printed Site ID form can be found on your TurboWaste account page. If you don't have access to TurboWaste, contact the Annual Report Team.
- 15 <https://apps.ecology.wa.gov/publications/SummaryPages/ecy070603.html>
- 16 <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303>
- 17 <https://www.epa.gov/hwgenerators/final-rule-management-standards-hazardous-waste-pharmaceuticals-and-amendment-p075>
- 18 <https://apps.ecology.wa.gov/publications/SummaryPages/0704024.html>
- 19 <https://ecology.wa.gov/DOE/files/89/891643dc-fc8c-41b3-b149-6bcefa46947c.pdf>
- 20 <https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC173-303>
- 21 hwtrrulemaking@ecy.wa.gov
- 22 <https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC173-303-FAQ>
- 23 <http://listserv.ecology.wa.gov/scripts/wa-ECOLOGY.exe?SUBED1=DW-RULES&A=1>
- 24 <https://apps.leg.wa.gov/wac/default.aspx?cite=173-303>
- 25 <https://apps.ecology.wa.gov/publications/SummaryPages/1904023.html>
- 26 <https://apps.ecology.wa.gov/publications/SummaryPages/1904023.html>
- 27 <https://apps.ecology.wa.gov/publications/SummaryPages/1904008.html>
- 28 <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Dry-cleaners/Replace-PERC>
- 29 <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Dry-cleaners/Replace-PERC>
- 30 ProductReplacement@ecy.wa.gov

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