

Shoptalk

Dangerous Waste & Pollution Prevention
Newsletter

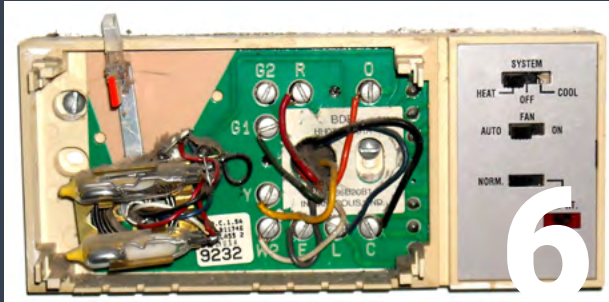
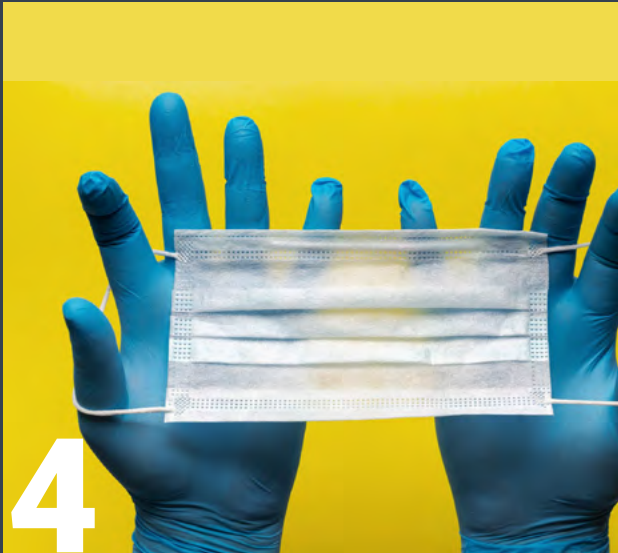
SPRING 2020

A photograph of a mechanic in a dark uniform working on the underside of a car that is elevated on a yellow hydraulic lift. The garage is filled with various tools, equipment, and automotive products. In the background, there are shelves with tires, a red Snap-on toolbox, and a Shell service station sign. The overall scene is a typical automotive repair shop.

Get the latest updates on COVID-19 and dangerous waste.

Are all used shop towels dangerous waste? Find out.

Publication #20-04-002



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Spring cleaning! No, wait—COVID-19...

That's right—we had originally planned for this to be a lighthearted spring cleaning-themed issue of Shoptalk. However, circumstances have changed drastically since we started writing articles for our May issue.

Now, businesses want to know how the Coronavirus will affect them.

How will they be regulated during the stay-home order? How can they prevent the spread of the virus at their business?

We answer these questions and many others in this issue of Shoptalk. Stay safe and healthy out there, everyone. ♦

RUTH FROESE



CLICK HERE
FOR COVID-19
UPDATES.

About Shoptalk



Publication information

Publication: 20-04-002
Issue: May 2020

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.



Is COVID-19 changing how we regulate dangerous waste?

As [Coronavirus \(COVID-19\)](#)¹ continues to affect our personal lives, you may also be concerned about how it will affect your business operations. Without key personnel on site, it may be difficult to fulfill requirements of the [Dangerous Waste Regulations](#).² At Ecology, we recognize the need to approach regulatory work in new ways. Our [COVID-19 dangerous waste webpage](#)³ has the latest updates.

Changes to enforcement

Federal

EPA published a [temporary policy](#),⁴ retroactive to March 13, 2020. It will be lifted as soon as normal operations can resume.

State

State requirements remain the same, but we will follow EPA's guidance closely while exercising **reasonable discretion** when deciding whether to pursue violations that may be linked to the current COVID-19 pandemic.

Here's what you need to do

- Continue to safely manage and operate facilities to protect public health and the environment.
- Expect delays to routine inspections and site visits. Be aware that compliance and enforcement efforts will continue during this time.

Do you anticipate compliance issues due to COVID-19?

Contact [your regional Ecology office](#)⁵ and ask to speak with a **dangerous waste compliance specialist**.

What about pollution prevention?

Are you interested in reducing how much dangerous waste you generate? Toxics Reduction staff are still here to help answer your questions about toxic chemical use, dangerous waste generation, and facility operating costs. If you need help, [please reach out to us](#).

If you have other questions, check out our [COVID-19 dangerous waste webpage](#).³ We update this page regularly as circumstances change. ♦

MEGAN HILLYARD & RUTH FROESE



Six steps to clean your business to prevent the spread of COVID-19



1

Clean frequently touched surfaces.

Before you disinfect a surface, use an all-purpose cleaner with safer ingredients to remove dirt and dust.

2

Do you really need to disinfect?

Is the surface frequently touched? If not, just clean it—there's no need to disinfect.

3

Choose safer products.

Look for labels like Cradle to Cradle, Safer Choice, Green Seal, or Ecology labels.

4

Use products as directed.

Never apply cleaning products to yourself or others. Follow the directions provided on the product label.

5

Follow contact time on package.

Contact time is the length of time the product must stay on the surface visibly wet to be effective against the virus.

6

Wash your hands after disinfecting.

After using the cleaning or disinfecting product, wash your hands with soap and water for 20 seconds.



Bonus! Stay informed and share with others.

1. Washington Department of Health [COVID-19 information](#).⁶
2. University of Washington's resource on [safer disinfecting strategies](#).⁷

3. EPA's list of [registered disinfectants for use against SARS-CoV-2](#).⁸

4. Centers for Disease Control and Prevention [resources for businesses and employers](#).⁹ ♦

LAUREN TAMBOER

CHECK OUT THE FULL BLOG POST!

Recycling mercury-containing thermostats

Got construction? Look out for old thermostats!

Springtime is usually construction time; however, many construction projects are on hold due to COVID-19. If you do have the opportunity to work on a construction site this spring—or even if you're just in the midst of planning a construction project—remember to check for old mercury-containing thermostats. These thermostats require special attention so that the mercury inside is managed properly.

Why focus on these old thermostats?

One thermostat can contain up to 18 grams of mercury (that's just over 3½ teaspoons). Although that might not sound like a lot, **each year** in Washington, that adds up to an estimated 412 pounds of improperly handled mercury from thermostats. If mercury is thrown into the trash and sent to our landfills instead of being properly managed, it can negatively impact human health and the environment.

The type of mercury found in thermostat switches is a known neurotoxin. Some of the possible health effects—even from low levels of exposure to this type of mercury—include tremors, insomnia, headaches, changes in nerve response, and poor performance on tests of mental functions. High levels or prolonged exposure may also result in kidney damage, respiratory failure, or even death.

Moving in a positive direction

A ban on sales of mercury-containing thermostats took effect in Washington state in 2006. Many major manufacturers (like Honeywell and GE) have phased out mercury in thermostats since then and moved toward digital thermostats, which don't require mercury components.

What to do with the waste?

If they are not recycled, mercury-containing thermostats must be

Negative human health effects of mercury:



1. Tremors



2. Kidney damage



3. Headaches



4. Respiratory issues



5. Insomnia



6. Confusion



7. Death



One thermostat
can contain up to
18 grams
of mercury.



In Washington,
412 lbs
of mercury are improperly
disposed each year.

designated and managed as dangerous waste, or conditionally regulated as universal waste under the [Dangerous Waste Regulations](#).¹⁰

The good news is that there is a national program dedicated to the recycling of thermostats: [Thermostat-Recycle.org](#). There, you will find information related to the regulation of mercury-containing thermostats, as well as a location finder

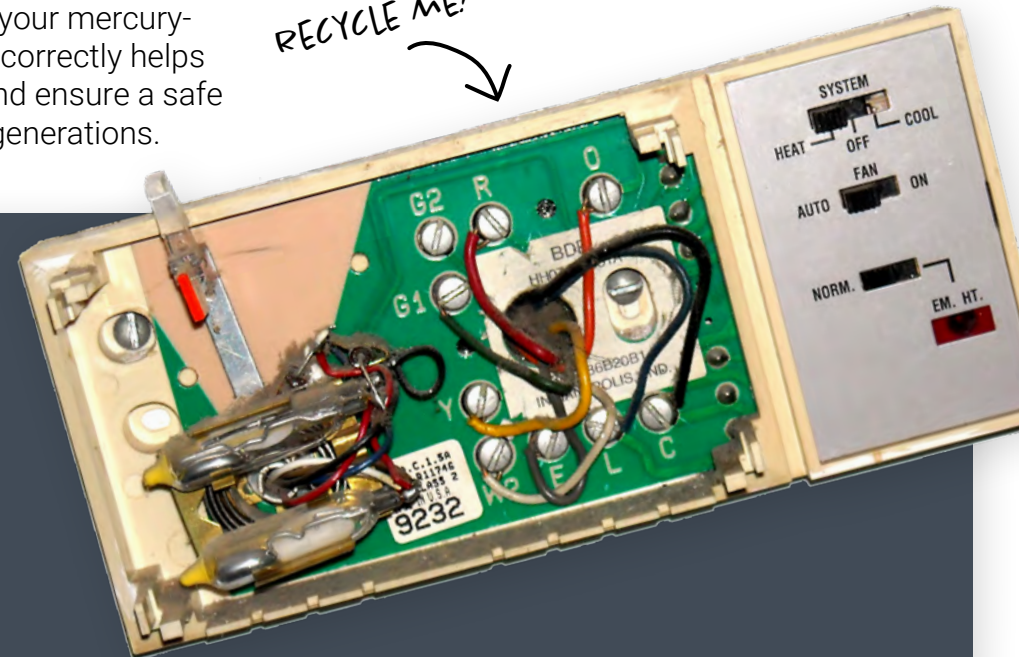
for facilities that accept thermostats (from both businesses and residences) and recycle them, **free of charge**.

If you are a business, recycled thermostats do not count toward your generator status. **If you are a homeowner**, managing your mercury-containing thermostats correctly helps protect human health and ensure a safe environment for future generations.

[Thermostat-Recycle.org](#) offers a great opportunity to manage old thermostats correctly for free! ♦

ANDY MAHER

RECYCLE ME!



Resources:

- **Publication:** [Focus On The Universal Waste Rule—Mercury-containing Equipment](#)¹¹
- **Website:** [Common Dangerous Waste—Mercury](#)¹²
- **Website:** [Thermostat Recycling Corporation](#)¹³
- **Publication:** [Washington State Mercury Chemical Action Plan—February 2003](#)¹⁴

Help abandoned waste find a home

As a property owner or site manager, if you discover abandoned waste on your property, you must designate and manage it properly.

So you found abandoned waste—now what?

Abandoned waste must be [designated](#)¹⁵ promptly after it is discovered. Often, lab analysis is the only way to designate abandoned waste, since you may not know what it is or how it was generated. **If sampling is required for designation, you must begin procedures to sample and test the waste within 24 hours of discovering it.**

A new resource is here to help

We recently published [Focus on: Unknown wastes](#)¹⁶ to help generators manage abandoned wastes and other types of unknown waste that require sampling. This resource explains how you can follow the Dangerous Waste Regulations to safely manage unknown waste. This means separating the waste in a central accumulation area and labeling the containers with the date of discovery and the words **“Waste Pending Analysis.”** Containers must be closed and in good condition.

What to do with the results

If sample results determine that the waste is dangerous waste, then the date of discovery is the start date for any accumulation time limits. Manage the waste following all of the rules for your [generator category](#),¹⁷ such as labeling containers “Dangerous Waste” or “Hazardous Waste,” and applying all the appropriate hazard labels. ♦

TAMI APPLEBEE

If abandoned waste designates as dangerous waste, the date of discovery is the start date for any accumulation time limits.

Be safe! If you find abandoned waste that is leaking, [report the release](#).¹⁸ If you and your staff are not equipped to safely stop and clean up the leak, you may need to contact a private contractor.

Go lean to save some green!

Impact Washington¹⁹ and the Washington State Department of Ecology²⁰ offer a deeply discounted (up to 80% off) consultation and training program to local manufacturers. By using lean and green tools that improve efficiency and the environment, this program may enhance the competitiveness and resilience of your business.

What to expect:

- Lower employee health risks.
- Reduced waste and lower operating, raw material, and utility costs.
- Better process flow, product quality, supply chains, and productivity.
- Better worker morale, safety, and environmental performance.

We will tailor services to your needs by:

- Helping you meet business goals and targets.
- Supporting process improvement and training events.
- Developing a marketing plan and sales support.
- Compiling a summary report of cost and waste reductions.

Companies that participated have jointly saved over \$2 million. See what the team from AccraFab has to say in this video!²¹

◆  HUGH O'NEILL

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Facility aisle space

'Tis the season for spring cleaning! At home, this usually means donating old clothes or cleaning out the garage, but it may also be a good time to do some spring cleaning at your work site. Here's a simple tip to help improve worker safety.

Do your aisles feel a bit tight? Medium and large quantity generators must maintain aisle space to any facility area for emergency preparedness. This improves ease of movement within your facility when time is of the essence, allowing responders, emergency equipment, or spill control equipment to move quickly and safely. Right now, maintaining aisle space also helps employees practice proper social distancing at your facility.

If you are unable to meet this requirement, [contact one of our compliance specialists²²](#) for help. ♦

ERIC MCCONNELL

Update on vaping waste

Guidance on how to handle vaping waste is changing quickly as we learn more about nicotine vaping solutions, e-cigarette cartridges, and other nicotine-containing products. There have been a number of rule and policy changes in the last year, so read on to make sure your vaping waste disposal practices are up to date!

Designate and dispose

When vaping products become waste, they usually [designate](#)²³ as dangerous waste. We published an [interim policy](#)²⁴ to help vaping retailers comply with the [Dangerous Waste Regulations](#)²⁵ when managing vaping waste. Retailers disposing of expired or banned flavored

vapor products under the interim policy must use an approved hazardous waste contractor.

Do not put nicotine-containing products in the trash, burn them, or pour them down the drain.

A quickly changing industry

Washington State Board of Health recently adopted a [second emergency rule](#)²⁶ to ban the sale of vapor products containing vitamin E acetate for 120 days. In addition, the U.S. Food and Drug Administration issued [federal restrictions](#)²⁷ on certain flavored cartridge-based e-cigarettes.

With all of these recent changes, **we will keep our interim policy in effect until**

Washington state adopts the Federal Pharmaceutical Rules anticipated in fall 2020. These [proposed rules](#)²⁸ include regulations that will cover the disposal of electronic nicotine delivery systems.

What to do for now

Nicotine vaping wastes must be disposed of in compliance with Washington's Dangerous Waste Regulations or under the interim policy conditions. The interim policy also covers THC-containing vapor wastes. Check out our webpage on [vaping and e-cigarettes](#)²⁹ for more information.

What about batteries?

Used lithium ion batteries from vaping devices may also designate as dangerous waste. Retailers can manage batteries removed from electronic nicotine delivery systems as dangerous waste or universal waste. Learn more in this [fact sheet](#).³⁰ ♦

TAMI APPLEBEE

SEPT. 27, 2019

OCT. 10, 2019

Nov. 5, 2019

JAN. 2, 2020

MAR. 19, 2020

The Governor's executive order 19-03 banned the sale of flavored vaping products.

Washington State Board of Health approved the emergency rule banning the sale of flavored vaping products for 120 days.

Ecology implemented an interim policy to help retailers dispose of vaping waste.

U.S. Food and Drug Administration issued federal restrictions on certain flavored e-cigarettes.

Washington State Board of Health adopted a second emergency rule banning the sale of vapor products with vitamin E acetate for 120 days.

New labels for your dangerous waste

Good news! We created new waste labels that will help your facility comply with the Dangerous Waste Regulations. Check out our [free labels webpage](#)³¹ to download and print these new labels.

We already offered the most commonly used labels, but now there are options for more specific scenarios like:

- Episodic waste.
- Satellite accumulation areas.
- State-only waste.
- Waste pending analysis.

We also created new labels for additional waste types:

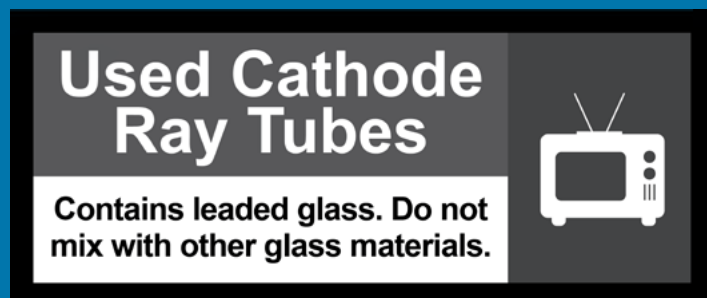
- E-waste.
- Cathode ray tubes.
- Spent antifreeze.

If you haven't seen our [labeling webpage](#),³² it's a great resource with many more labels that you can download and print for free. Be sure to print one label per 8 ½ x 11" landscape page.

A labeling requirement for half-inch tall letters took effect last year. This ensures employees and emergency personnel can read them from a distance.

To learn more about labeling requirements, check out [Focus on: Labeling Dangerous Waste](#).³³ ♦

RUTH FROESE



New exclusions for solvent-contaminated wipes

Did you know you might not need to count solvent-contaminated wipes toward your generator category?³⁴ Often, these wipes (for example, used shop towels) designate as dangerous waste, but you may be able to manage them under an exclusion. Solvent-contaminated wipes can be:

- Reusable wipes that will be laundered.
- Disposable wipes.

The Dangerous Waste Regulations define solvent-contaminated wipes³⁵ and explain how to manage wipes when using the exclusions. These exclusions replace our old guidance on used shop towels. **Keep in mind that some wipes are not eligible, depending on the type of contaminants.**

Common examples of wipes are:

- Paper towels
- Cloth rags
- Cotton swabs
- Shop towels

These wipes can designate as dangerous

waste if they are contaminated with solvent from cleaning up a spill or from cleaning machinery, equipment, or parts. Examples of eligible solvents include:

- Methyl ethyl ketone
- Toluene

If your wipes are eligible and you follow all the conditions in the exclusions, the weight of the wipes does not count toward your monthly generator category³⁶ and you do not need to report it on your Dangerous Waste Annual Report.³⁷ You don't have to use the exclusions just because your wipes are eligible; you can still choose to manage them as dangerous waste.

For more guidance on whether your wipes qualify and what management and recordkeeping requirements apply, read Focus on: Conditional exclusions for solvent-contaminated wipes,³⁸ or contact one of our compliance specialists³⁹ for help. ♦

TAMI APPLEBEE

Want to read more about exclusions in the Dangerous Waste Regulations?

- Find the definition for solvent-contaminated wipe at [WAC 173-303-040](#).⁴⁰
- Find the exclusion for reusable, laundered wipes at [WAC 173-303-071\(3\)\(rr\)](#).⁴¹
- Find the exclusion for disposable wipes at [WAC 173-303-071\(3\)\(ss\)](#).⁴²



Upcoming events and trainings

FREE!

COVID-19 event update

Most in-person events have been canceled due to COVID-19. However, some events will be hosted online.

The [Green Chemistry & Engineering Conference](#)⁴³ recently decided to shift to an online format. This event is now free to anyone interested in attending.

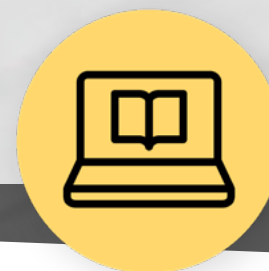
* The following information and references are provided as a convenience only. Any reference in this publication to persons, organizations, services, or activities does not constitute or imply endorsement, recommendation, or preference by the Washington State Department of Ecology.



Conference

Green Chemistry & Engineering Conference

Where: Online
When: June 15–19, 2020



Training

Online Green Chemistry & Chemical Stewardship Program

Where: Online
When: Sept. 28, 2020



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Endnotes

- 1 <https://www.cdc.gov/coronavirus/2019-ncov/index.html>
- 2 <https://apps.leg.wa.gov/wac/default.aspx?cite=173-303>
- 3 <https://ecology.wa.gov/COVID19DW>
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- 12 <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Mercury>
- 13 <https://www.thermostat-recycle.org/>
- 14 <https://fortress.wa.gov/ecy/publications/summarypages/0303001.html>
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