Shoptalk

Dangerous Waste & Pollution Prevention Newsletter

FALL 2020

Remote compliance inspections: A new type of inspection in response to the pandemic. **5**

Some hand sanitizers are dangerous waste. Find out which ones in this issue. **8**

DEPARTMENT OF ECOLOGY
State of Washington

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Accommodation requests
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WHAT'S **NEW** WITH **DANGEROUS WASTE** TODAY?

Four things to know about remote compliance inspections

MEGAN HILLYARD

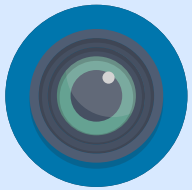
In response to the COVID-19 pandemic, we're starting a new remote compliance inspection program for some facilities. Dangerous waste inspectors can now evaluate your business via video conference instead of visiting in person. They may work with you through phone calls, electronic records submission, and video. Here are four important things to know:

1. The main difference: It's mostly virtual.

Before COVID-19, inspectors would typically meet with you in person to evaluate dangerous waste activities. Inspections included a records review, a site tour, and a regulatory compliance discussion. These activities will still be part of our remote inspection process; however, you can expect these interactions to look and feel a bit different as we all adjust to exchanging information virtually.

2. Preparation looks pretty similar.

In many ways, how you prepare for an inspection[1] remains the same; however, we work with you to schedule the inspection instead of arriving unannounced. Expect to spend more time communicating with inspectors to ensure we have compatible technologies and to schedule a time for the inspection. We may use technology like secure file transfer and video conferencing tools.



3. We may ask you to take us on a virtual tour.

We might ask for a site tour using the video conference tools available to you. The livestream video(s) will not be recorded, but inspectors may ask to take still photos of certain areas. Up to three inspectors may be present. The lead inspector will ask to see areas where you generate and keep dangerous waste (like satellite accumulation areas, central accumulation areas, or locations where you treat dangerous waste on site).

4. If needed, we'll follow up in person later.

After you've had a remote inspection at your facility, we may still conduct an on-site visit. Inspectors are strictly following all public health guidelines when making decisions about when it is safe to conduct a follow-up on-site inspection. While remote inspections are a good option during the pandemic, we're still conducting in-person inspections for many facilities.

Stay Informed

Do you have questions about dangerous waste management or compliance concerns[2] during the pandemic? Contact your regional Ecology office[3] to speak to a hazardous waste specialist. ◆

Changes to dangerous waste regulations

ROB RIECK

We just adopted changes to the Dangerous Waste Regulations (WAC 173-303[4]) on Sept. 30 that will take effect Oct. 31, 2020. Some of these new rules make our state's dangerous waste regulations consistent with federal regulations, while others are state-only changes. Washington has more rules about dangerous waste to be more protective of human health and the environment.

Pharmaceutical waste changes

One of the biggest changes this September was adopting the federal Hazardous Waste Pharmaceutical Regulations.[5] This change tailors regulations to health care facilities, such as hospitals, walk-in clinics, long-term care facilities, pharmacies, and veterinary clinics. It better aligns rules related to how pharmaceutical wastes are managed in other health care settings. Check out our article on pharmaceutical waste for more information.

Changes to e-manifest and airbag rules

There are also new rules for electronic manifests.[6] These changes set the methods EPA uses to establish and revise fees for facilities using e-manifests.

In response to federal guidance, we added new rules for managing recalled airbags as well. Airbags removed from vehicles are a dangerous waste because they are ignitable and reactive. They can explode and injure people. This rule[7] makes removing and collecting airbag waste safer.

Want to know more about these new rules?

You can read about this rulemaking process[8] or subscribe to our dangerous waste emails[9] for more information on dangerous waste rulemaking. ◆

Prioritizing proper waste packaging

ANDY RIPPERT

Make sure your waste that goes to a treatment, storage, and disposal (TSD) facility is appropriately marked, packaged, and otherwise ready for transportation and processing. This is your responsibility, not your waste service provider's responsibility.

Commercial TSDs in our state have seen an increase in mispackaged wastes. In one case last year, a container even caused a fire!

We want to help you understand how to meet packaging requirements and keep your workers safe. You may receive a letter reminding you of these requirements to improve compliance and working conditions for those who process our dangerous wastes.

In the meantime, check out this self-guided training[10] or refer directly to the federal regulations[11] about preparing dangerous materials for transport. ◆

Some hand sanitizers may be dangerous waste

STACEY CALLAWAY

What's in your hand sanitizer?

Hand sanitizers are everywhere. As the COVID-19 pandemic continues, more hand sanitizer brands have become available, and they are not all the same. Some hand sanitizers contain a hazardous ingredient.

Many hand sanitizers use ethanol or isopropyl alcohol as active ingredients to disinfect bacteria and viruses. However, earlier this summer, the Federal Drug Administration (FDA) conducted testing and found several companies mislabeled their products. The FDA urged consumers not to use certain hand sanitizers[12] because the active ingredients were a mix of ethanol and methanol, and in some cases contained as much as 83% methanol.

Methanol is a volatile, colorless, flammable liquid with a distinctive alcoholic odor. It is commonly used to make formaldehyde, solvents, foams, and adhesives. Methanol is toxic to humans and should not be applied on the skin. Methanol can be absorbed through the skin and processed in the body. Mild exposure can cause dermatitis. Significant exposure can cause:

- Nausea
- Vomiting
- Headache
- Blurred vision
- Blindness
- Seizures
- Coma
- Death

My hand sanitizer contains methanol. Now what do I do?

If your hand sanitizer is on the FDA's list of products you should not use,[13] try to return it to the manufacturer or dispose of it as dangerous waste. **Do not flush or pour the hand sanitizer down the drain or throw it in the garbage.**

When disposed, hand sanitizers containing methanol may designate as ignitable dangerous waste (D001) and as a discarded chemical

product (U154). Contact a hazardous waste specialist[3] if you have questions about how to designate or manage sanitizer waste.

What about other disinfectants, like wipes?

Disinfectant wipes may designate as dangerous waste depending on the chemicals added to the wipes. Check your safety data sheets and follow the designation procedures to determine the best way to dispose of your wipes. Remember, wipes that designate for state criteria—even if they don't contain solvents—may be eligible for the solvent-contaminated wipes exclusion.[14] ◆

Check out these helpful articles for more information about methanol in hand sanitizer:

- FDA Updates on Hand Sanitizers Consumers Should Not Use[12]
- Is Your Hand Sanitizer on FDA's List of Products You Should Not Use?[13]
- American Association of Poison Control Centers[15]

If you still have questions, contact a hazardous waste specialist[3] at your regional Ecology office.

New rules for pharmaceutical waste at healthcare facilities

TAMI APPLEBEE & JENNY YOO

Here in Washington, we're adopting a federal rule called Management Standards for Hazardous Waste Pharmaceuticals[16] (commonly called Subpart P). Washington's version will apply to waste pharmaceuticals that are either federal hazardous waste or Washington state-only dangerous waste. This rule will take effect October 31, 2020.

No more interim policy

The Interim Pharmaceutical Waste Policy will no longer be an option for healthcare facilities in Washington starting October 31, 2020. The conditional exclusion that some healthcare facilities used for state-only dangerous waste pharmaceuticals will now only apply to wastes confiscated by Washington law enforcement agencies.

Does this change your generator category?

Before determining generator category, remember to verify if the special requirements apply to your dangerous waste pharmaceuticals. If your healthcare facility previously used the Interim Policy and conditional exclusion, you must now count dangerous waste pharmaceuticals to determine how these new special requirements apply.

After counting both pharmaceutical and non-pharmaceutical dangerous waste, if your facility is still a small quantity generator, you'll have choices in how to manage your dangerous waste pharmaceuticals.

If the special requirements apply, you only count your nonpharmaceutical dangerous waste to determine your generator category and the applicable dangerous waste regulations.

We're here to help

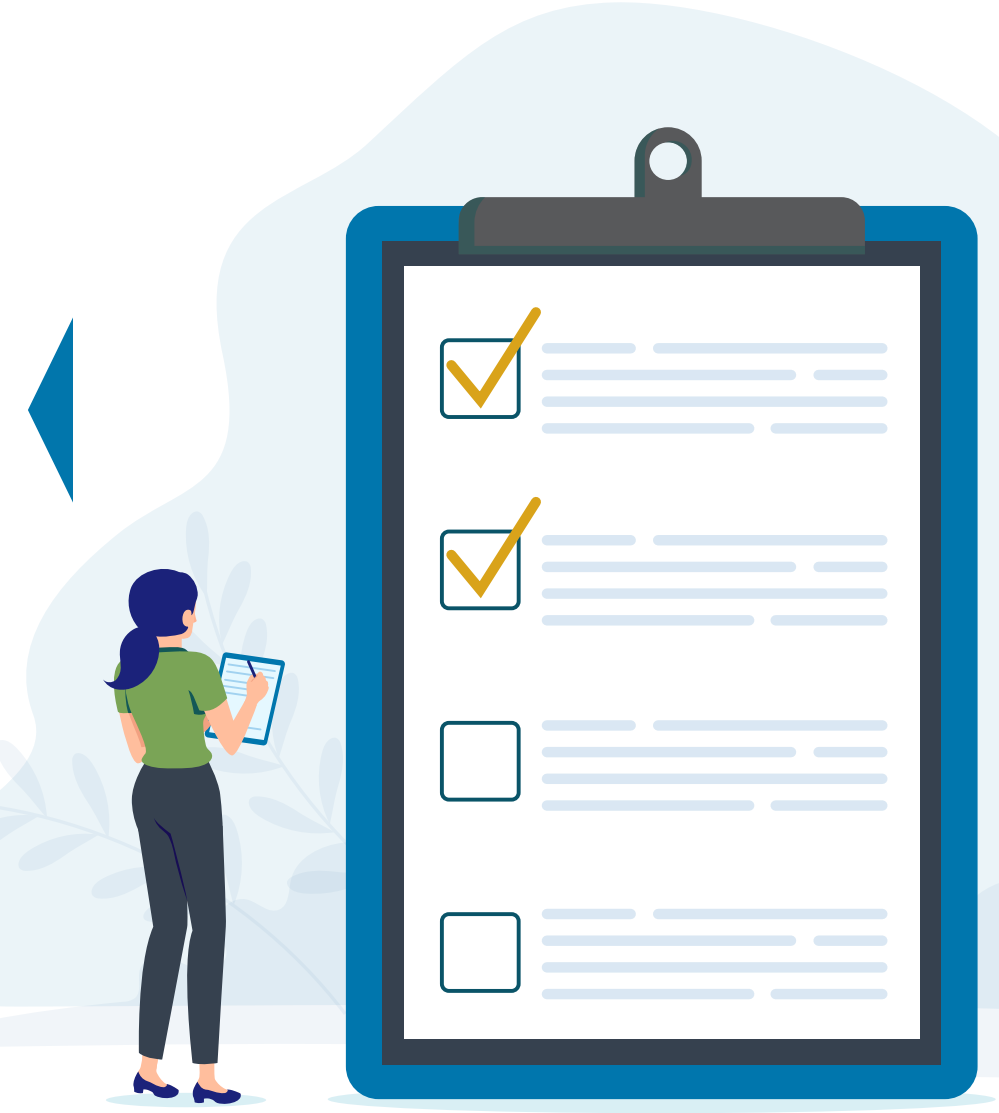
For more information on these new requirements for managing dangerous waste pharmaceuticals, go to our rulemaking web page.[8] You can also contact a hazardous waste specialist at your regional Ecology office[3] with questions. We will share more guidance on our pharmaceutical waste webpage[17] as it becomes available. ◆

All health care facilities are prohibited from discharging dangerous waste pharmaceuticals to the sewer under the new rule.

Does this apply to me?

The new rule defines “health care facility.” This may affect you if you work at one of these types of facilities:

- Ambulance services
- Ambulatory surgical centers
- Chiropractors
- Dental providers
- Health clinics
- Hospitals
- Long-term care facilities
- Long-term care pharmacies
- Medical clinics within larger facilities
- Optical providers
- Psychiatric hospitals
- Physicians’ offices
- Pharmacies
- Retailers of pharmaceuticals
- Veterinary clinics
- Veterinary hospitals



PFAS chemicals added to the Toxics Release Inventory list

DIANE FOWLER

EPA added 172 new types of per- and polyfluoroalkyl substances (PFAS) to its list of chemicals covered by the Toxics Release Inventory (TRI). Businesses must complete this toxics inventory as part of the Emergency Planning and Community Right-to-Know Act. If your business reports under TRI, remember to track and collect data on the new PFAS chemicals during 2020. **Reports for these chemicals will be due July 1, 2021.**

In general, chemicals covered by TRI are those that cause:

- Cancer or other chronic human health effects.
- Significant adverse acute human health effects.
- Significant adverse environmental effects.

The current TRI chemical list contains 767 individually listed chemicals within 33 chemical categories. This includes the newly added PFAS chemicals.

If your business is in a TRI-covered industry, prepare by determining if PFAS are present in the products you manufacture, import, process, or use. **If you meet the 100-pound PFAS reporting threshold, you'll need to track and collect data on these chemicals in 2020.**

Visit EPA's website[18] to learn more about TRI's reporting requirements. ◆

Changes to EPCRA reporting system

DIANE FOWLER

Tier Two Online will have a new look in 2021. If your business reports under the Emergency Planning and Community Right-to-Know Act (EPCRA), expect to see changes in the online system. Improved navigation will make it easier to report. We also have new data fields to complete.

You'll notice changes beginning January 1, 2021, when you complete your 2020 reports. **Remember, 2020 reports are due March 1, 2021.**

What's new

- **Expanded chemical hazard categories.** There are now 24 hazard categories instead of five. These expanded hazard categories will help us align more closely with the federal reporting form and provide detailed chemical hazard information that will help first responders.
- **New format for geolocation information.** Geolocation data is now in decimal degrees, the format used by most mapping programs (including Google Maps).
- **New look-up feature.** This will help you locate your business's North American Industry Classification System (NAICS) code. This code is used to identify business type or classification. NAICS codes are updated every five years, and Tier Two Online will include the latest update.
- **Improved online navigation and expanded help menus.** These will help you complete your online report.

How to prepare

If your business reports Tier Two in Washington, prepare by reviewing your safety data sheets for each chemical or product you'd typically report. You'll need to enter the hazard categories from each SDS into the new reporting fields for your online reports.

If you'd like to sign up for electronic reporting through Tier Two Online, visit our EPCRA online reporting webpage.[19] ◆

SMALL CHANGES, **BIG** RESULTS: DANGEROUS WASTE **SUCCESS STORIES**

The past, present, and future of waste in Washington

AMY CORREA

The past

How we've dealt with our waste over the past 50 years has changed a lot! Before 1970, more than a thousand landfills and open dumps littered our state. Sometimes, we burned waste or let it pollute our soil and water. It was a time when we didn't fully understand the consequences of these actions.

Washington legislators passed the first laws aimed at preventing and cleaning up pollution in 1969. These same principles still guide how we address waste and prevention today.

The present

Thanks to decades of hard work prompted by these laws, we've seen improvement: communities, human health, and the environment are all safer from waste and toxic materials. However, we know our state's growing population will cause more consumption and pollution. To stay ahead of the problem, we must continue looking forward and taking action.

The action

The State Solid & Hazardous Waste Plan[20] is one tool we use to plan for future pollution. We update this plan about every five years with input from the public. The plan covers current and upcoming challenges and actions to help us make progress toward specific goals.

The plan's goals and actions address:

- Managing dangerous waste and materials.
- Managing solid wastes and materials.
- Reducing impacts of materials and products.
- Measuring progress.
- Providing outreach and information.

Public comments welcome

We will publish the latest plan update in 2021. In the meantime, we welcome your comments on the draft plan. To learn more or provide input, **please visit the Ecology website[21] or sign up to receive email updates.[22]**

The future

We don't know exactly what the future will bring, but we all have a part to play in creating the future we want. This plan helps us think about what we can do to get there. ◆

Switching to safer paints

IFEANYI ISIGWE

Did you know the type of paint you use could make a difference in employee safety, waste disposal costs, and protecting the environment? There are two different types of paint, and one is much more toxic than the other—this toxicity can have unanticipated costs later down the road.

A tale of two paints

Paints are either solvent based or water based. Decades ago, almost all paints were solvent based because solvents (organic compounds) make a hard, scratch-resistant finish. However, advances in paint formulation mean water-based paints can now achieve a similar finish.

The solvents used in paints have negative impacts on human health and the environment. High levels of volatile organic compounds (VOCs) in these paints can cause:

Health impacts for workers:

- Eye, nose, and throat irritation
- Respiratory issues
- Headaches
- Nausea
- Liver damage
- Kidney damage
- Cancer

Environmental impacts:

- Smog
- Ozone depletion
- Climate change

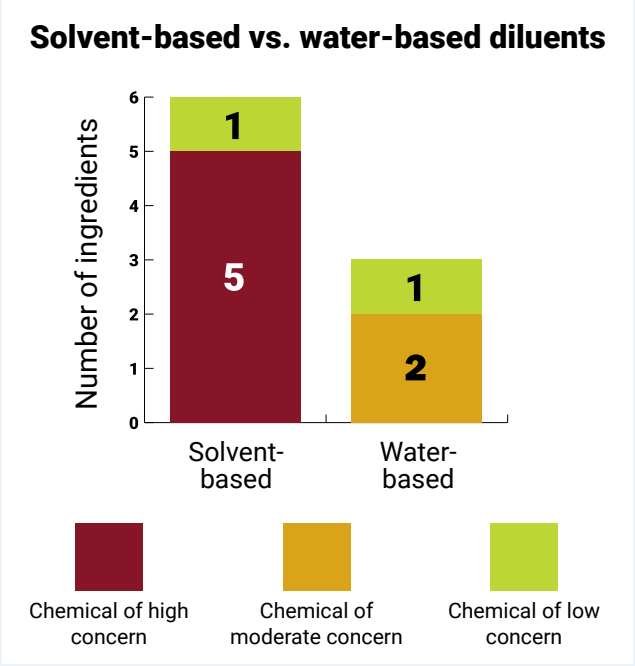
The safer alternative is water-based paint. It's low in VOCs, making it an environmentally friendly alternative without the health concerns associated with VOCs. Bonus: water-based paints are easier to clean and dry faster than their solvent-based counterparts.

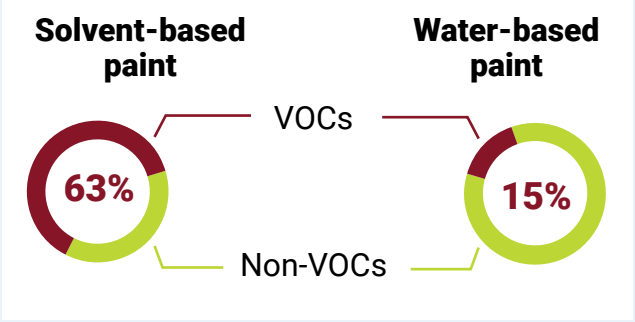
Putting paints to the test

We recently worked with USNR, a wood equipment manufacturer in Woodland, Washington, to assess the chemical hazards of their paints. The results confirmed that water-based paint is significantly less toxic than solvent-based paint. The solvent-based paint in this assessment contained five chemicals of high concern, while the water-based paint contained no chemicals of high concern.

After learning this, USNR switched to water-based paint at all of their locations nationwide. Switching to this safer paint allowed the company to reduce VOC emissions and environmental liabilities significantly. They also reduced their overall paint material waste output, which helped them save money in waste disposal costs.

Water-based paints are an easy and safe alternative to solvent-based paints. Assess the paints at your business to determine if switching to water-based paints would work for your operations. Want help with a paint assessment? Contact one of our toxics reduction specialists[23] to learn more about how to switch to safer alternatives.[24]





Safer solvents for your business

CRAIG MANAHAN

Is your business looking for safer solvent chemicals to promote a healthier workplace? You may be wondering if alternative solvents are actually safer for people and the environment. We had the same question, and a chemical hazard assessment of six common solvent alternatives gave us some answers.

The concern

We tested solvent alternatives that could replace dangerous solvents like methylene chloride and n-propyl bromide. These two solvents are harmful to human health, contributing to:

- Carcinogenicity.
- Reproductive health issues.
- Developmental health issues.

Due to these health concerns, both methylene chloride and n-propyl bromide are designated as chemicals of high concern.

The test

We used the GreenScreen® for Safer Chemicals Methodology,[25] which is a standardized method for evaluating the hazards of chemicals. This method compares hazard levels with an overall "Benchmark" score. Chemicals receive one of the following scores:

- **Benchmark 1:** Avoid—chemical of high concern.
- **Benchmark 2:** Use, but search for safer substitutes.
- **Benchmark 3:** Use, but still opportunity for improvement.
- **Benchmark 4:** Prefer—safer chemical.

What we tested

The project aimed to identify alternative solvents that scored at least a Benchmark 2. We determined which chemicals to test by searching product formulations and asking companies about their use of solvents and potential alternatives. From this list, we removed solvents that were likely to score a Benchmark 1. This left us with six solvent alternatives to test.

The results

Check out the list of chemicals and their scores in the table below:

Chemical	CAS	Score
Methyl acetate	79-20-9	Benchmark 2
Cyclohexane	110-82-7	Benchmark 2
Diethylene glycol	111-46-6	Benchmark 2
Triethylene glycol	112-27-6	Benchmark 2
Ethyl acetate	141-78-6	Benchmark 2
n-Heptane	142-82-5	Benchmark 2

The full assessments are available in the Interstate Chemicals Clearinghouse chemical hazard assessment database[26]—a database that provides the results of chemical hazard assessments for free.

Want to learn more?

If your business is interested in switching to one of these chemicals, or if you want help using other safer chemicals at your workplace, we're here to help. You can contact a toxics reduction specialist in your area[3] or email the Safer Chemicals team at Safer.Chem@ecy.wa.gov.[27] ◆

Reduce waste, save money: Reusable canisters making a difference at Joint Base Lewis-McChord

JUSTIN MEYER

The 404th Army Field Support Battalion on Joint Base Lewis-McChord clean brakes on military vehicles. With our help, their facility recently tried a new way of delivering brake cleaner to brake systems: instead of using single-use aerosol cans, they used reusable canisters pressurized with compressed air and filled from a bulk container of brake cleaner product.

How these changes made a difference

By making the switch to reusable canisters and buying brake cleaner in bulk, this facility:

- Reduced supply costs.
- Generated less dangerous waste.
- Had less impact on dangerous waste landfills.

Before switching, they used hundreds of cans of brake cleaner each year. The cans designated as dangerous waste. By switching to the reusable bulk product, the facility saves $1,900 per year. They save this money through lower purchasing costs and reduced dangerous waste

disposal costs. The facility generates 127 fewer pounds of dangerous waste a year. Their reusable metal canisters are more sustainable than disposable aerosol cans that all have to be sent to the landfill.

Product selection and future efforts

The battalion discovered this new method when they decided to explore safer alternatives to brake cleaners. While they didn't switch the cleaning solution to an alternative, they were able to make these other meaningful changes.

Still looking for a good alternative

Our Product Replacement Program surveyed the facility technicians about the performance of the safer alternative brake cleaners. That information will help us improve future brake cleaner replacement projects.

We will also be funding a degreaser replacement project to help remove the most dangerous chemicals from degreasing operations. This effort is currently in development, so stay tuned.

If your business is interested in participating in future pilot programs, contact Justin Meyer at Justin.Meyer@ecy.wa.gov.[28] ◆

NEW OR UPDATED **RESOURCES**: **HELPFUL GUIDANCE** FOR DANGEROUS WASTE GENERATORS

Guides

- Guide to Dangerous Waste by Generator Category[29]
- Counting Dangerous Waste Under the Dangerous Waste Regulations[30]
- Shop Guide for Dangerous Waste Management[31]
- Guide to Dangerous Waste Training[32]
- Biological Testing Methods for the Designation of Dangerous Waste[33]

Reports

- Product Replacement Program: 2019–2020[34]

Forms

- Dangerous Waste Emergency Information[35]
- General Facility Inspection Log[36]
- Large Quantity Generator Tank Inspection Log[37]
- Medium Quantity Generator Tank Inspection Log[38]

Focus sheets

- Focus On: Treatment by Generator[39]

Posters

- Collect, Empty, and Dispose of Separator Water[40] (also available in Spanish[41] and Korean[42])
- Check your Central Accumulation Area[43]
- Inspect Your Dangerous Waste Drums[44]

Non-Ecology publications

- Employers Guide to COVID-19 Cleaning and Disinfection in Non-Healthcare Workplaces[45]

UPCOMING
EVENTS & TRAININGS

* 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.

Transitioning to Safer Chemicals

Where: Online

When: Nov. 19–20, 2020

Sign up

Green Chemistry Challenge Awards

What: Nominate your green chemistry technology.

Deadline: Dec. 4, 2020

Sign up

Green Chemistry & Chemical Stewardship Online Certificate Program

Where: Online

When: Sept. 2021–June 2022

Sign up

The University of Washington is offering a $100 discount for participants in Washington state. Tribal, BIPOC, and underserved community members are encouraged to register. If additional support is needed, please contact ce@uw.edu.

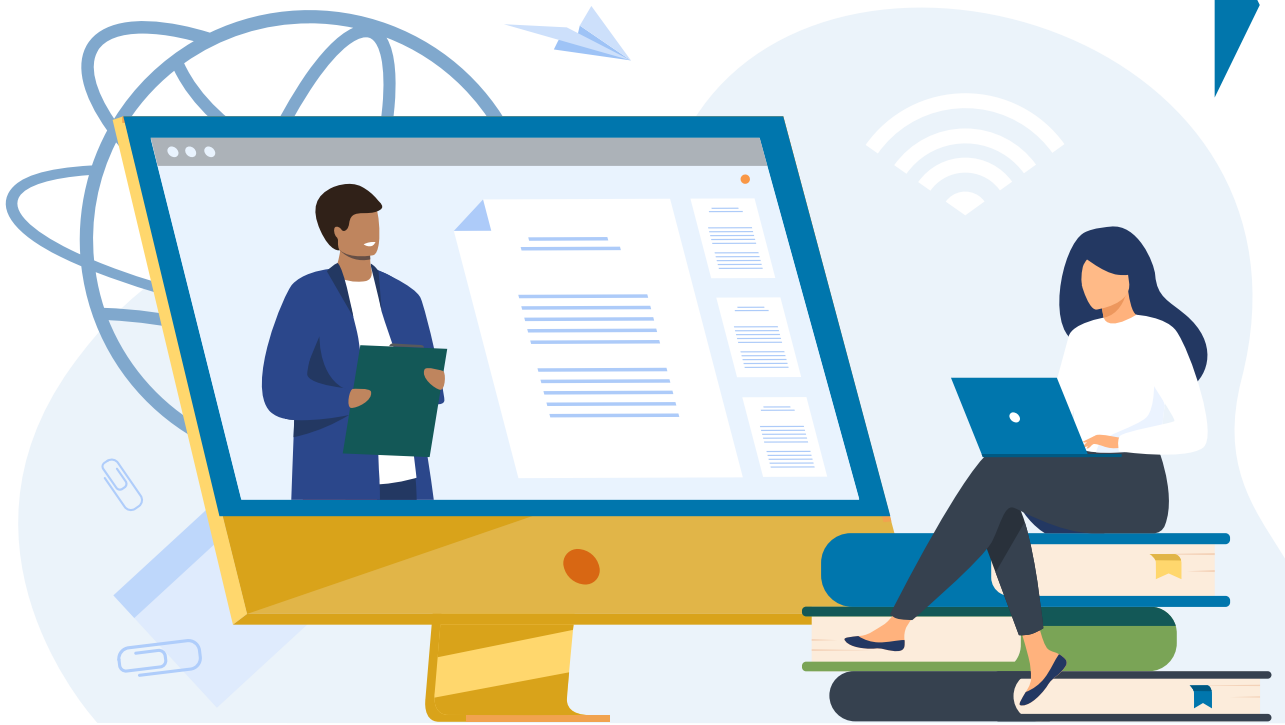


IMAGE CREDITS

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ENDNOTES

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