

Shoptalk

Dangerous Waste & Pollution Prevention
Newsletter

WINTER 2021

**Millions of airbags
recalled—learn how to
manage the waste.**

6

**Get reporting
deadlines on
your calendar!**

8



DEPARTMENT OF
ECOLOGY
State of Washington

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

Receiving facilities: Remember, eManifest is going fully electronic

JON JENNINGS

In the last few years, EPA updated the federal Resource Conservation and Recovery Act (RCRA) rules for hazardous waste manifesting requirements.¹ They also created eManifest, their national system for tracking hazardous waste shipments electronically.

This database system serves as the central point for all paper and electronic manifest submissions. Here in Washington, we recently adopted the eManifest requirements into our state dangerous waste rules.²

What does this mean for your business? EPA will no longer accept paper manifests from receiving facilities starting June 30, 2021.

After June 30, 2021, receiving facilities will have two options for submitting their manifests to EPA's eManifest system:

1. Send an image file of page one of the manifest and any continuation sheet to EPA, or
2. Send a data file and an image file of page one of the manifest and any continuation sheet to EPA.

If you still have questions or you're having trouble using the eManifest system, EPA has multiple resources and [points of contact](#)³ available on their [eManifest website](#).⁴ ♦



Managing airbag waste

KATY HARVEY & STACEY CALLAWAY

In 2015, the National Highway Traffic Safety Administration (NHTSA) issued a massive recall of Takata-manufactured airbags due to faulty components. This recall affected millions of vehicles from more than a dozen manufacturers. According to a 2020 report, more than 15 million vehicles with defective airbags remain on U.S. roads.

Can I use the conditional exclusion?

If your facility removes defective airbags from vehicles in Washington, you can now manage this waste stream under [a conditional exclusion](#).⁵ This means you won't need to manage the airbags as dangerous waste if you comply with exclusion conditions.

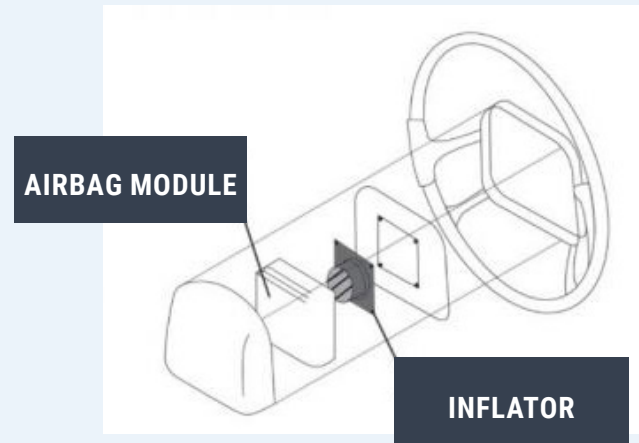
What makes an airbag dangerous waste?

Undeployed airbags contain a propellant inside the inflators—this is what makes them designate as ignitable (D001) and reactive (D003) dangerous waste. When deployed in a car accident, the airbag uses up the propellant and removes the reactivity and ignitability characteristics.

What is the difference between an airbag module and an inflator?

An airbag module contains the airbag inflator and an inflatable bag assembly. Inflators are small canisters that house the explosive propellant and initiator.

The diagram on the right shows the placement of an airbag and inflator in a steering column.



How do I comply with the airbag exclusion?

Facilities responsible for removing defective airbags—like car dealerships, automotive repair shops, and junk yards—are called **airbag handlers**. If you fit this definition and want to use the conditional exemption, you must:

- Accumulate fewer than 250 modules/inflators (combined) at one time **and** for no longer than 180 days, whichever comes first.
- Use appropriate containers⁶ for the dangerous waste (D001, D003), and label them “Airbag Waste—Do Not Reuse.”
- Keep records⁷ for five years.
- **Not** reuse defective or recalled airbag modules or inflators.
- **Not** deploy the airbags on site.

What are the disposal options?

Airbag handlers must send waste modules/inflators directly to one of the following:

1. An **authorized airbag collection facility** (that is under the control of a vehicle manufacturer or their authorized representative, such as a certified auto parts dealer).
2. A **permitted treatment, storage, and disposal facility** (TSDF).

Airbag collection facilities and TSDFs that accept modules/inflators under this exclusion become the generator of the waste.

What are the requirements for airbag handler-transporters bringing the airbags to an airbag collection facility?

Airbag handler-transporters must follow U.S. Department of Transportation regulations. Hazardous waste manifests **aren't** required and the waste **doesn't** have to be shipped by a hazardous waste transporter.

Resources

- [EPA FAQs about the Regulation of Airbag Waste](#)⁸
- [Find Out If Your Air Bag Is Under Recall](#)⁹
- [Car And Driver—Everything You Need to Know](#)¹⁰
- [2018 EPA Memo Regulatory Status of Automotive Airbag Inflators and Fully Assembled Airbag Modules](#)¹¹



A new year means it's time to submit annual reports

SHAWNA GRIFFIN

Reporting season has arrived—and that means it's time to submit your [Dangerous Waste Annual Report](#).¹² Reports are due by March 1.

What's new this year?

Pharmaceutical requirements. In October 2020, we adopted the [Special requirements for management of dangerous waste pharmaceuticals](#)¹³ (WAC 173-303-555). If you are subject to these rules, you must [notify us](#)¹⁴ **before** you submit your report.

Used oil report. If you are a used oil processor or refiner, you will find the Used Oil Report is now an addendum in TurboWaste.

Management method codes. We now require a [recycling percentage](#)¹⁵ for each waste stream managed off site under:

- **H010:** Metals recovery (retorting, smelting, chemical, etc.)
- **H020:** Solvents recovery (distillation, extraction, etc.)

You can find this information in the documentation provided by your designated facility (for treatment, storage, disposal, and recycling).

Protecting your information

[SecureAccess Washington \(SAW\)](#)¹⁶ and the Electronic Signature Agreement (ESA) both add layers of security. All dangerous waste reporters must apply for the TurboWaste service in SAW. If you already use SAW, 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.

How to get help

Check out our instructions on how to [register for TurboWaste and get an ESA](#).¹⁷ We're here to help you succeed. Please contact the Annual Report Team at 800-874-2022 or turbowaste@ecy.wa.gov if you need help. ♦



Deadline reminders

DIANE FOWLER

2020 Tier Two reports are due March 1, 2021.

If your business reports under the Emergency Planning and Community Right-to-Know Act (EPCRA), your Tier Two reports are due March 1, 2021. If you'd like to sign up for electronic reporting through Tier Two Online, visit our [EPCRA online reporting webpage](#).¹⁸

2020 TRI reports are due July 1, 2021—these include newly added PFAS chemicals.

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 chemical inventory as part of EPCRA. Reports for these chemicals are due July 1, 2021.

[Visit EPA's website](#)¹⁹ to learn more about the TRI reporting requirements. ♦



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

Founder's Choice saves thousands by reducing waste

HUGH O'NEILL & IFEANYI ISIGWE

A custom kitchen and bath cabinetry company called [Founder's Choice](#)²⁰ recently learned how to save \$112,000 per year in operations costs. They found these cost savings through working with the Department of Ecology and [Impact Washington](#).²¹ And the best part? They reduced their yearly waste and emissions by about 15,000 pounds.

What improvements did they make?

Founder's Choice saved money by:

- Providing efficiency training for staff.
- Identifying and purchasing more effective equipment.
- Recycling and reusing certain materials.
- Improving air compressor use.
- Installing LED lighting.
- Improving and refining the manufacturing process.

How did they cover the cost?

This Pierce County company funded the improvements with grant money. First, they reached out to the [City of Tacoma](#)²²

and the [Tacoma-Pierce County Economic Development Board](#).²³ They recommended applying for a \$25,000 grant from Ecology and more than \$100,000 in grants from a state [Job Skills Program](#).²⁴

Starting in late 2019, Founder's Choice collaborated with Ecology and Impact Washington consultants (at a vastly reduced rate thanks to grant money) to discover these efficiencies. Lean and green projects like this help companies reduce operating costs, raw material use, risks and liabilities, wastes, and environmental impacts.

Want to save money and improve your business?

Ecology and Impact Washington have funding for approximately four to six more improvement projects that have projected completion dates before Sept. 30, 2021. To find out more about these grant opportunities, visit the [Impact Washington grants page](#).²⁵ ♦



Top five pollution prevention resources for your business

LEATTA DAHLHOFF

It's a new year—many look at this time of year as an opportunity to reflect on the past and set new intentions for the future. For dangerous waste generators, maybe now's the time to revisit your pollution prevention plan. If this seems too daunting, here are five resources that can help:

1. **Ecology—Cost Analysis of Pollution Prevention**²⁶

Regular planning helps you measure your efforts over time. Our Toxics Reduction Specialists use multiple data collection points to help your business [find pollution prevention opportunities](#)²⁷ and turn them into results. [Contact a regional Toxics Reduction Specialist](#)²⁸ to get help with your plan.

2. **EPA—Pollution Prevention (P2) Resources for Business**²⁹

Pollution prevention pays! Increasingly, the nation's leading corporations understand the value of pollution prevention—as an environmental strategy, a sustainable practice, and a fundamental principle.

Here are two tools that EPA provides:

- [TRI's P2 Search Tool](#)³⁰ now helps identify P2 successes and compare P2 performance at both the facility and corporate level.
- [Technical Assistance Programs \(TAPs\)](#)³¹ provide businesses with cutting edge environmental management assistance and help identify measures that reduce or eliminate pollution at its source.

3. **Pacific Northwest Pollution Prevention Resource Center**³² (PPRC)

PPRC recognizes that different organizations have different and changing needs. They offer a range of assistance programs tailored to help your business solve specific sustainability issues.

What's a Pollution Prevention Plan?

Many businesses in Washington must write and submit a pollution prevention plan to Ecology. In this plan, businesses explain how they aim to use fewer hazardous substances and reduce their output of dangerous waste. Even when this isn't required, many businesses still write plans that include some sort of waste minimization portion. Since it's a new year, now is a great time to refresh your goals and identify new opportunities.

[Pollution Prevention Assessment/Walkthrough](#)³³ Take a holistic look at how your business can prevent pollution and save money.

[Spray Paint Efficiency](#)³⁴ Help your painters and paint managers save money and improve worker safety through a one-day training program.

[Bilingual Spray Efficiency Training](#)³⁵ Take trainings offered in Spanish and English providing necessary 6H certification, saving painters money and materials, and improving worker safety.

4.

EnviroStars³⁶

The EnviroStars program provides environmental assistance and recognition for Washington businesses. It's funded by participating cities, counties, and utilities, as well as grants.

5.

WSU Energy Program³⁷

Operating much like a consulting firm, the Washington State University (WSU) Energy Program provides energy services, products, education, and information—all focused on advancing the environmental and economic wellbeing of customers. WSU Energy Program customers include businesses of all sizes and types, utilities, governments, tribes, universities, consumers, and many others. ♦



NEW OR UPDATED **RESOURCES** FOR DANGEROUS WASTE GENERATORS



Guides

[Shop Guide for Dangerous Waste Management](#)³⁸

[Guía para Talleres Manejo de Desechos Peligrosos](#)³⁹

[Dangerous Waste Pharmaceuticals Guide](#)⁴⁰

[Keeping your home and family healthy: Reduce your exposure to PFAS](#)⁴¹

[Guide to On-Site Distillation](#)⁴²



Reports

[Toxics Reduction Program Progress Report: Oct. 2019 – Sept. 2020](#)⁴³

[The State Solid and Hazardous Waste Plan 2021 – 2026: First Draft Update](#)⁴⁴



Forms

[Site ID Form](#)⁴⁵

[Site ID Form Addendum: Used Oil Report](#)⁴⁶



Focus sheets

[Focus On: How to Develop a Written Contingency Plan](#)⁴⁷

[Focus On: Reporting Dangerous Waste Spills](#)⁴⁸

[Focus On: Treated Wood Exclusion](#)⁴⁹



Posters

[Inspeccione Sus Tambores De Desechos Peligrosos](#)⁵⁰

[Revisa Sus Áreas De Acumulación Central](#)⁵¹



Other

[Find Your Competitive Edge with Lean/ Green Operations](#)⁵²

[Better Brakes Law Policy Statement on Reporting Requirements for OESC Friction Material](#)⁵³



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.

Green Chemistry & Chemical Online Certificate Program

When: Sept. 2021–June 2022

Where: Online

Green Chemistry and Engineering Conference (Now virtual!)

When: June 14–18, 2021

Where: Online

Lean & Green Coaching and Project Support Program

When: Feb. 2021–Sept. 2021

Where: Online

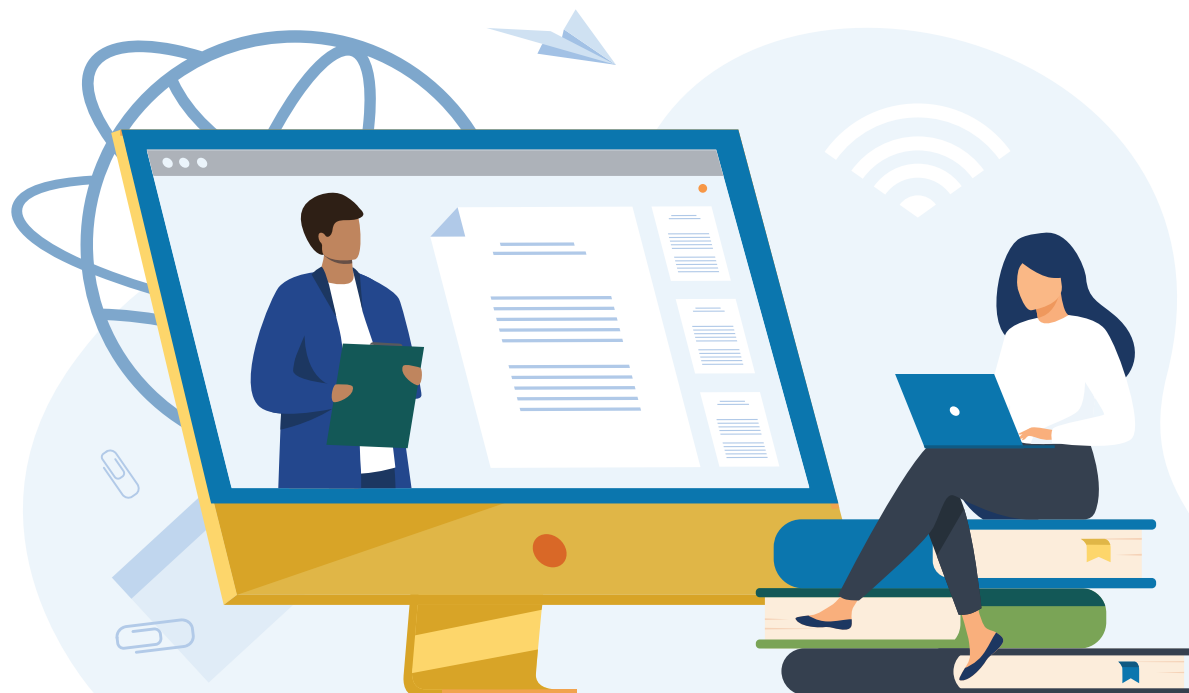


IMAGE CREDITS

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ENDNOTES

- 1 Changes to federal RCRA regulations, which include the eManifest deadlines are in 40 CFR § 264.71(j)(1) and (2).
- 2 Updates to WAC 173-303-370(1)(e)(i) and (ii) to reflect federal eManifest requirements were adopted in September 2020, and may not be reflected on the web version of the rule yet. To view the adopted changes, check out [Agency Filings Affecting This Section](#) and [WSR Filing Number 20-20-045](#).
- 3 <https://www.epa.gov/e-manifest/forms/contact-us-about-hazardous-waste-electronic-manifest-system>
- 4 <https://www.epa.gov/e-manifest>
- 5 WAC 173-303-071(3)(tt): <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-071>
- 6 Includes containers that meet US Department of Transportation requirements for shipping airbag modules or airbag inflators per 49 CFR part 173. For questions about shipping hazardous materials under DOT regulations, contact DOT's Hazardous Materials Information Center. <https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center>
- 7 Records include off-site shipment and confirmation receipts like receiving facility information, amount and types of airbag waste, and dates. Records must be made available on request.
- 8 <https://www.epa.gov/hw/frequent-questions-about-regulation-airbag-waste>
- 9 https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/12832a-takata_airbag_consumer_basic_fact_sheet_060518_v7b-tag.pdf
- 10 <https://www.caranddriver.com/news/a14499263/massive-takata-airbag-recall-everything-you-need-to-know-including-full-list-of-affected-vehicles/>
- 11 https://www.epa.gov/sites/production/files/2018-08/documents/airbags_memo_signed_7-19-18.pdf
- 12 <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Dangerous-waste-reporting-requirements/Dangerous-Waste-Annual-Report>
- 13 <https://apps.ecology.wa.gov/publications/SummaryPages/2004049.html>
- 14 <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Dangerous-waste-reporting-requirements/Notification-of-Dangerous-Waste>
- 15 <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Dangerous-waste-reporting-requirements/Dangerous-Waste-Annual-Report/Recycling-credits>
- 16 <https://secureaccess.wa.gov/myAccess/saw/logout.do>
- 17 <https://apps.ecology.wa.gov/publications/SummaryPages/1904017.html>
- 18 <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Emergency-Planning-Community-Right-to-Know-Act/Tier-Two-reporting>

19 <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities>
20 <https://wwwFOUNDERSCHOICE.com/>
21 <https://www.impactwashington.org/>
22 https://www.cityoftacoma.org/government/city_departments/community_and_economic_development/economic_development_services
23 <https://www.edbtacomapierce.org/>
24 <https://www.sbctc.edu/for-employers/job-skills.aspx>
25 <https://www.impactwashington.org/grants.aspx>
26 <https://apps.ecology.wa.gov/publications/SummaryPages/95400.html>
27 <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Preventing-hazardous-waste-pollution/Technical-assistance-for-business/Efficiency-services-for-manufacturing-industries>
28 <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Preventing-hazardous-waste-pollution/Technical-assistance-for-business/Meet-our-team>
29 <https://www.epa.gov/p2/p2-resources-business>
30 <https://enviro.epa.gov/facts/tri/p2.html>
31 <https://www.epa.gov/p2/p2-resources-business#tech>
32 <https://pprc.org/>
33 <https://pprc.org/2017/pprc/pollution-prevention-assessment/>
34 <https://pprc.org/2012/projects-2/projects/spray-painting-training-efficiency/>
35 <https://pprc.org/2016/pprc/bilingual-spray-efficiency-training-spanish-english/>
36 <https://envirostars.org/>
37 <http://www.energy.wsu.edu/>
38 <https://apps.ecology.wa.gov/publications/SummaryPages/0904015.html>
39 <https://apps.ecology.wa.gov/publications/SummaryPages/0904015ES.html>
40 <https://apps.ecology.wa.gov/publications/SummaryPages/2004049.html>
41 <https://apps.ecology.wa.gov/publications/SummaryPages/2004043.html>
42 <https://apps.ecology.wa.gov/publications/SummaryPages/2004030.html>
43 <https://apps.ecology.wa.gov/publications/SummaryPages/2004051.html>
44 <https://apps.ecology.wa.gov/publications/SummaryPages/2004057.html>
45 <https://apps.ecology.wa.gov/publications/SummaryPages/ECY070133.html>
46 <https://apps.ecology.wa.gov/publications/SummaryPages/ECY070632.html>
47 <https://apps.ecology.wa.gov/publications/SummaryPages/2004029.html>
48 <https://apps.ecology.wa.gov/publications/SummaryPages/2004036.html>
49 <https://apps.ecology.wa.gov/publications/SummaryPages/0304038.html>
50 <https://apps.ecology.wa.gov/publications/SummaryPages/2004046es.pdf>
51 <https://apps.ecology.wa.gov/publications/SummaryPages/2004039ES.html>
52 <https://apps.ecology.wa.gov/publications/SummaryPages/2004053.html>
53 <https://apps.ecology.wa.gov/publications/SummaryPages/2004050.html>

