

# Shoptalk

SUMMER 2022



WE'RE  
TRANSITIONING  
BACK TO  
**IN-PERSON  
INSPECTIONS.**

**TRACKING  
DANGEROUS  
WASTE  
SHIPMENTS  
WITH  
E-MANIFEST.**



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

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# About Shoptalk

## Publication information

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## Accommodation requests

To request an ADA accommodation, contact Ecology at 360-407-6700 or [hwtrpubs@ecy.wa.gov](mailto:hwtrpubs@ecy.wa.gov), or visit [ecology.wa.gov/accessibility](http://ecology.wa.gov/accessibility). For Relay Service or TTY, call 711 or 877-833-6341.

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

# Transitioning back to in-person activities

KATELYNN PIAZZA

## In-person compliance inspections: what to expect

Earlier in the COVID-19 pandemic, our dangerous waste compliance inspectors conducted many of their evaluations remotely. Since the Governor relaxed pandemic restrictions, we're resuming in-person inspections.

Inspectors conduct the majority of their site visits unannounced—but due to the pandemic, they may reach out before they arrive. They'll ask about recent COVID cases at your site and discuss your safety protocols. On the day of the inspection, the inspector will:

- Follow Ecology's current policy on wearing masks and social distancing.
- Ask to speak to someone about how the facility generates, designates, and manages dangerous waste.
- Tour the facility and document their observations with notes and photos. This includes looking at production areas, points of waste generation, and accumulation areas.

To limit their time on site, the inspector might review records electronically before or after the on-site inspection.

Visit our website to learn more about how to [prepare for an inspection](#).<sup>1</sup>

## Visit us at the office

Our offices are open to the public again! If you want to visit us in person, we encourage you to call your [region's office](#)<sup>2</sup> in advance to schedule an appointment. This ensures Ecology staff are available to meet with you.

All visitors must complete an online health screening prior to visiting an Ecology office. Our [COVID-19 webpage](#)<sup>3</sup> offers the latest information related to our business practices and any operational changes. ♦



# PERC equipment replacement program

LIZ KUNZ AND ERICH EBEL

**Are you a dry cleaner shop owner, tired of burning your eyes with stinky perchloroethylene (PERC) solvent fumes and paying for expensive waste disposal? Take advantage of our dry cleaner equipment replacement program and ditch PERC for good!**

Since 2019, Ecology has offered reimbursement of up to \$10,000 to replace your PERC machine with high-flash hydrocarbon (HFH) or up to \$40,000 for professional wet cleaning (PWC) equipment.

[Replacing your PERC machine](#)<sup>4</sup> has many benefits, including reduced exposure to carcinogenic chemicals, lower waste

disposal costs, and less potential for spills to the environment.

Here's how the program works:

1. **Sign up** with Ecology, and a specialist will visit your store to survey the chemicals you have on site.
2. **Decommission** and scrap your PERC machine under Ecology oversight. If your shop is closing or you are no longer using PERC, contact us today about a decommission-only option.
3. **Dispose** of all PERC, equipment containing PERC, and waste properly. Keep copies of your disposal records to submit to Ecology for reimbursement.
4. **Purchase** and install an HFH or PWC machine, and work with your vendor or a bank for payment.
5. **Complete** a form and submit your invoices and disposal receipts to us—then we'll send you a check for up to the amounts stated above.

Call Product Replacement Coordinator, Sean Smith, at 425-324-0328 or email [Sean.Smith@ecy.wa.gov](mailto:Sean.Smith@ecy.wa.gov) to get started today! ♦



# Tracking dangerous waste shipments with e-Manifest

SHAWNA GRIFFIN

E-Manifest is EPA's system to help you electronically track dangerous waste shipments. With e-Manifest, you can:

- Create, edit, sign, and print manifests.
- Track and get accurate and timely information on waste shipments.
- Increase cost savings.

## Getting started

1. Update your information in [TurboWaste](#).<sup>5</sup>
2. Register for e-Manifest on EPA's [RCRAInfo website](#).<sup>6</sup>

For registration questions, email [emanifest@epa.gov](mailto:emanifest@epa.gov) and write "registration" in the subject line.

## What can you do to ensure good data in e-Manifest?

- Review your manifest before signing at pick up.
- Know how your [waste designates](#)<sup>7</sup> and record it accurately.
- Review your data and correct errors.

## Additional resources

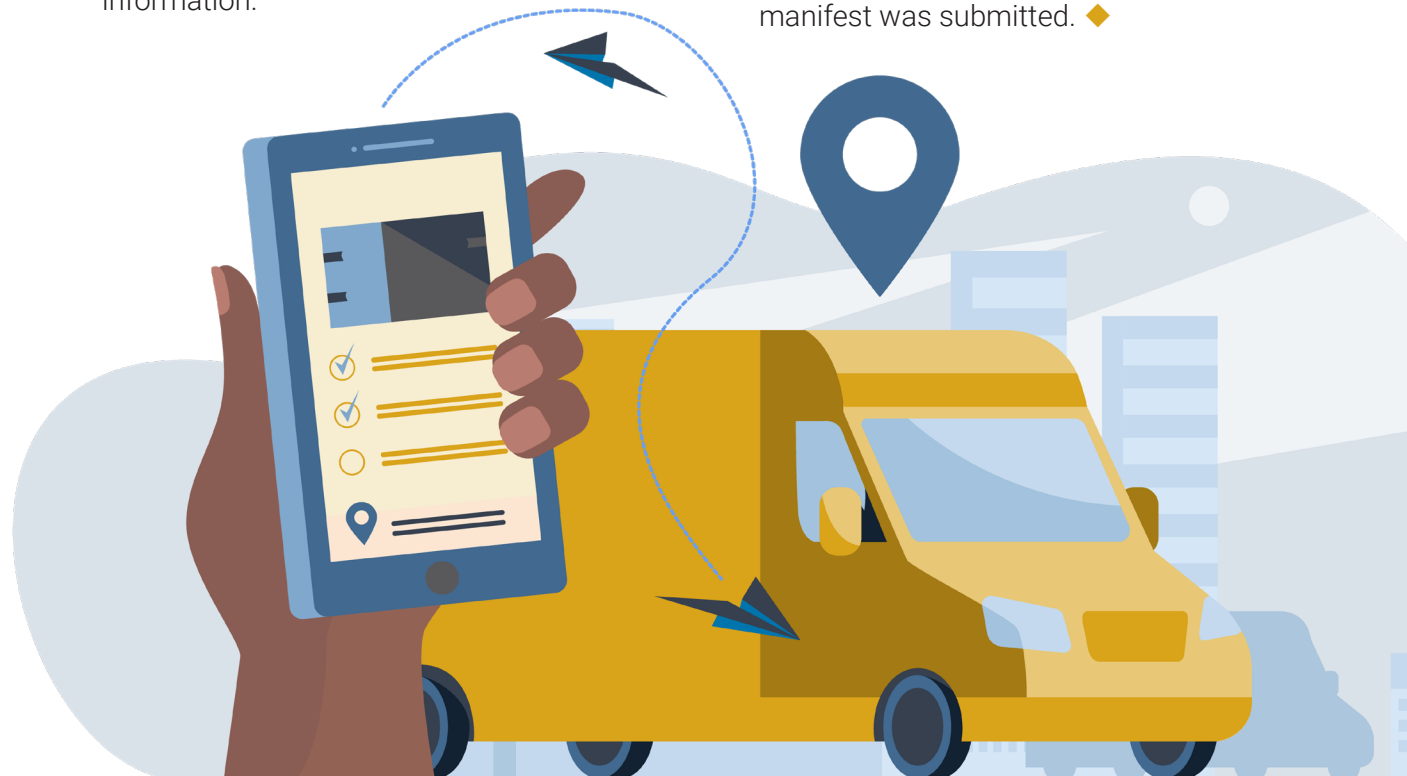
Subscribe to the Daily Digest email for additional information about e-Manifest, including upcoming webinars, rule changes, and public comment periods. Email [listmanager@lists.epa.gov](mailto:listmanager@lists.epa.gov) and write "Set e-Manifest digest" in the body of the email.

Visit the [e-Manifest website](#)<sup>8</sup> for more information.

## Looking for a missing manifest?

If you're an industry user registered with EPA, you can search manifests on the RCRAInfo website.

If you **aren't** an industry user, you can view a manifest without registering on RCRAInfo by waiting 90 days after the manifest was submitted. ♦



# Exception reports: when and who to notify

LAUREN SMITH

**Uniform hazardous waste manifests provide a record of your waste shipments and proof that your dangerous waste reached its designated facility. The designated facility must send you a signed copy of your manifest (in Item 20 of the form) documenting they received the waste.**

If you don't get the final signed copy of your manifest within the timeframes listed below, take these steps:

- Within **35 days**: Contact your transporter or designated facility for the status of the dangerous waste shipment.
- Within **45 days**: [Submit an exception report to Ecology](#).<sup>9</sup>

Track your dangerous waste shipments to ensure you receive all signed copies of your manifests within the required deadlines. Keep all your manifests on site for at least five years from the date the initial transporter accepted the waste.



## Required documents

If a signed manifest is not received, medium and large quantity generators must submit the following documents:

- A copy of the manifest (sometimes called the transporter copy).
- A cover letter explaining the efforts you made to determine what happened to your shipment and the results of those efforts.

## Where to send reports

Submit exception reports via mail or email to your [last compliance inspector](#)<sup>10</sup> or your [region's office](#).<sup>11</sup>

If sending to your region's office via:

- Mail, write "Attention Hazardous Waste Program" on the envelope.
- Email, send to:
  - **Central Region Office:** [crohwtr@ecy.wa.gov](mailto:crohwtr@ecy.wa.gov)
  - **Eastern Region Office:** [erohwtr@ecy.wa.gov](mailto:erohwtr@ecy.wa.gov)
  - **Northwest Region Office:** [mindy.collins@ecy.wa.gov](mailto:mindy.collins@ecy.wa.gov)
  - **Southwest Region Office:** [swrohwtresource@ecy.wa.gov](mailto:swrohwtresource@ecy.wa.gov)

OR

- **Ecology's Industrial Section:** Contact your last inspector.
- **Ecology's Nuclear Waste Program:** [kathy.conaway@ecy.wa.gov](mailto:kathy.conaway@ecy.wa.gov)

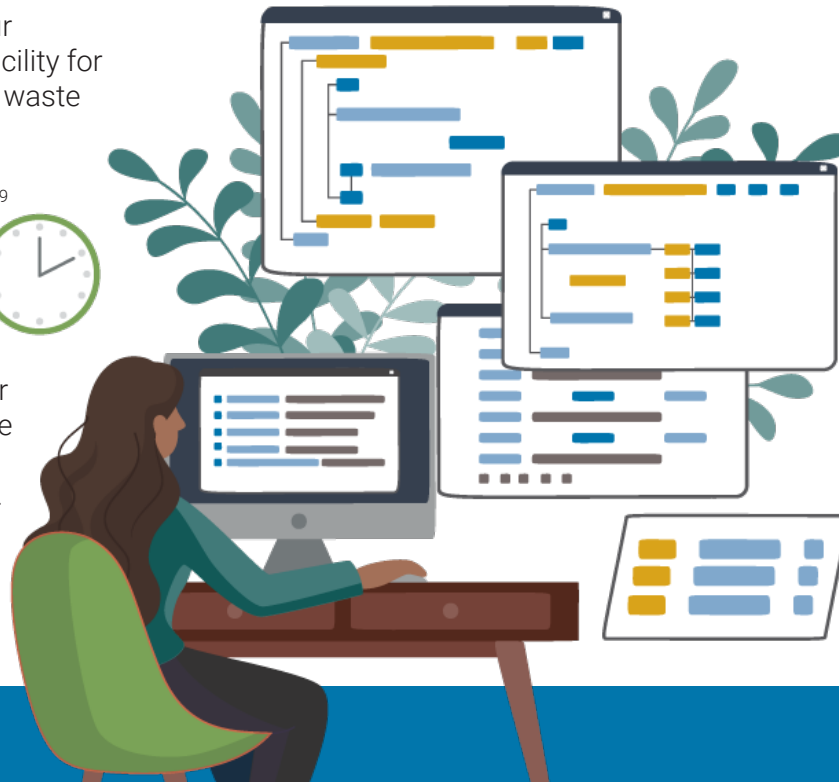
## Do records in EPA's e-Manifest system count?

Yes, signed copies in e-Manifest are official copies of the record.

If you use e-Manifest for recordkeeping, ensure your signed manifests are available in e-Manifest and can be provided upon request.

Resources:

- [Keeping Records](#)<sup>12</sup>
- [Uniform Hazardous Waste Manifest: Instructions, Sample Form and Continuation Sheet](#)<sup>13</sup>
- [E-manifest user registration FAQ](#)<sup>14</sup>





An overhead view of three men in a warehouse. They are standing in an aisle between tall metal shelving units filled with cardboard boxes. The man on the left is wearing a brown and tan work jacket and dark pants. The man in the middle is wearing a green quilted vest over a plaid shirt, a white knit beanie, and dark pants. The man on the right is wearing a brown and tan work jacket, a red baseball cap, and dark pants. They are all looking at a tablet held by the man in the middle. The floor is a dark, polished concrete.

## New PFAS chemicals added to TRI

DIANE FOWLER

**2021 TRI reports are due July 1, 2022—this includes reports for newly added PFAS chemicals that are reportable this year. Remember to track additional PFAS chemicals now for next year's report.**

EPA added new types of per- and polyfluoroalkyl substances<sup>15</sup> (PFAS) to its list of chemicals covered by the Toxics Release Inventory (TRI) for 2021. If your business is in a TRI-covered industry<sup>16</sup> and the products you manufacture, import, process, or use contain the new types of PFAS, you must report these chemicals by July 1, 2022. The reporting threshold for PFAS is 100 pounds.

Businesses must complete this chemical inventory as required under the Emergency Planning and Community Right-to-Know Act<sup>17</sup>.

Additional PFAS<sup>18</sup> are on the list for 2022. You must track and collect data on these chemicals this year. Report these PFAS by July 1, 2023.

EPA may add new chemicals to the TRI list annually. The current TRI toxic chemical list<sup>19</sup> contains 775 individually listed chemicals and 33 chemical categories, including 180 individually listed PFAS chemicals.

Visit EPA's TRI website<sup>20</sup> to learn more about the reporting requirements. ◆

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

# Coaching for process, energy, and environmental improvement

HUGH O'NEILL

It's hard to see opportunities for process improvement and cost reduction when you're focused on running a business day to day. Break out of your usual routine, use new tools, and see your operations from a new perspective. The Lean and Green Project Support Program is online and helps you learn new skills, find low-cost opportunities to reduce utility bills and environmental impacts, and increase profits.

You will use simple continuous improvement tools to uncover opportunities and inefficiencies in your facility that fall outside of traditional approaches. You can also get help navigating regulatory and permitting issues. Results may lead to:

- Pollution prevention.
- Energy reduction.
- Improved worker morale and engagement.
- Improved public and customer image.
- Reduced operating costs.
- Improved process efficiency.

## Program details

The program offers two tiers of support that address **W.A.S.T.E. (Water, Air, Solid Waste, Toxins, Energy)**. Ecology or Impact Washington can help you select the right project for your company.

1. **W.A.S.T.E. Walk:** Designed for smaller companies and involves less time (4 hours of class and 12 hours of coaching, plus time on your own to work on your project).
2. **W.A.S.T.E. Project:** Designed for larger companies with dedicated resources for environmental or process improvement initiatives (10 hours of class and 40 hours of coaching, plus time on your own to work on your project).

## Dates

**W.A.S.T.E. Walk:** Aug. 30–Nov. 10, 2022 (every other week for three months).

**W.A.S.T.E. Project:** Sept. 13–March 9, 2023 (weekly for six months).

Receive a Lean and Green certificate from the Washington State Department of Ecology upon completing the program and project.

Fill out the [interest form](#)<sup>21</sup> to participate.

## For more information, contact:

**Brion Hurley, Program Lead and Coach:**

A Lean Six Sigma Master Black Belt with Business Performance Improvement.

He spent 18 years in the aerospace industry and has spent the past 10 years working on sustainability projects to reduce private sector energy and environmental impacts and improve nonprofit operations. Contact [brion@biz-pi.com](mailto:brion@biz-pi.com). ♦



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



## Guides

A Guide for Auto Body Shops ([English](#)<sup>22</sup> and [Spanish](#)<sup>23</sup>)

[Automotive Degreaser Replacement Fact Sheet](#)<sup>24</sup>

[PERC Fact Sheet \(Korean\)](#)<sup>25</sup>

[Focus on: Episodic Generation](#)<sup>26</sup>

[Designation Checklist](#)<sup>27</sup>



## Reports

[Toxics Reduction Program: 2021 Annual Report](#)<sup>28</sup>

[Toxics Reduction Program: 2021 Annual Report Overview](#)<sup>29</sup>

2022 Public and Community Survey Results: Safer Products for Washington Program ([English](#)<sup>30</sup> and [Spanish](#)<sup>31</sup>)

[Regulatory Determinations Report to the Legislature: Safer Products for Washington Cycle 1 Implementation Phase 3](#)<sup>32</sup>



## Forms

[Fluorescent Light Ballast Replacement Application](#)<sup>33</sup>



# IMAGE CREDITS

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4. Book stack vector created by Pch.Vector. [www.freepik.com](http://www.freepik.com)

# ENDNOTES

- 1 [www.ecology.wa.gov/InspectionPrep](http://www.ecology.wa.gov/InspectionPrep)
- 2 <https://ecology.wa.gov/About-us/Contact-Us/Find-a-location>
- 3 <https://ecology.wa.gov/coronavirus>
- 4 <https://ecology.wa.gov/Waste-Toxics/Reducing-toxic-chemicals/Product-Replacement-Program/Replace-PERC>
- 5 <https://ecology.wa.gov/TurboWaste>
- 6 [RCRAinfo.epa.gov](http://RCRAinfo.epa.gov)
- 7 <https://ecology.wa.gov/Designation>
- 8 <https://www.epa.gov/e-manifest>
- 9 <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-220>
- 10 <https://apps.ecology.wa.gov/StaffSubjectSearch/employeeSearch/staff>
- 11 <https://ecology.wa.gov/About-us/Contact-Us/Find-a-location>
- 12 <https://ecology.wa.gov/DWRecords>
- 13 <https://www.epa.gov/hwgenerators/uniform-hazardous-waste-manifest-instructions-sample-form-and-continuation-sheet>
- 14 <https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest?msckid=59c2904ec0f711ec86f5e4e460c22628#user>
- 15 <https://www.epa.gov/toxics-release-inventory-tri-program/addition-certain-pfas-tri-national-defense-authorization-act>
- 16 [https://ordspub.epa.gov/ords/guideme\\_ext/f?p=guideme:gd:::::gd:naics\\_codes](https://ordspub.epa.gov/ords/guideme_ext/f?p=guideme:gd:::::gd:naics_codes)
- 17 <https://www.epa.gov/epcra>
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- 20 <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities>
- 21 <https://www.impactwashington.org/lean-and-green-program-form.aspx>

22 <https://apps.ecology.wa.gov/publications/SummaryPages/2204020.html>  
23 <https://apps.ecology.wa.gov/publications/SummaryPages/2204020ES.html>  
24 <https://apps.ecology.wa.gov/publications/SummaryPages/2204019.html>  
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