



Shoptalk

WINTER 2024

In this issue

IT'S REPORTING SEASON!
GET THE DETAILS

HOW TO SAVE MONEY ON
WASTE DISPOSAL



Publication #24-04-001
February 2024

Contents

WHAT'S NEW WITH DANGEROUS WASTE TODAY?	3
Dangerous waste annual reports due March 1	4
Tier Two reports are due March 1	7
New chemicals added to the Toxics Release Inventory list	8
How to save money on waste disposal	10
SMALL CHANGES, BIG RESULTS: OPPORTUNITIES AND SUCCESS STORIES.....	11
Product Replacement Program successes	12
Free competition between laboratories with cold storage	13
HELPFUL GUIDANCE FOR DANGEROUS WASTE GENERATORS	14
UPCOMING EVENTS & TRAININGS	16
ENDNOTES	18

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

Dangerous waste annual reports due March 1

SHAWNA GRIFFIN

Reporting season has arrived—it's time to submit your Dangerous Waste Annual Report¹ by March 1, 2024.

What's new this year?

You can read our [Dangerous Waste Annual Reporting Guide](#)² to get all the details on this year's updates. Here are some highlights.

Updated universal waste section

The federal reporting requirements and the state-only reporting requirements for universal waste activities are separate questions in this year's Dangerous Waste Annual Report.

Biennial report year

If your site is a large quantity generator, designated facility, or a recycling facility, we'll send your data to EPA for the 2023 National Hazardous Waste Report. This is known as the [Biennial Report](#).³

We submit your data to EPA on your behalf, but you're responsible for data accuracy. You can ask us to review your data before you submit your report.



Before you submit your report, verify the following:

- All ID numbers and names of facilities you sent your waste to or that you received waste from are valid.
- Manifest data is complete and free of typos.
- Management Method Codes reported are the initial codes reported on the manifest.
- On-site management codes show the actual waste management process at your site.
- Source codes entered are accurate for each waste stream.

Updated management method codes

- **New codes:** H042, H113, H136, H137.
- **Retired Code:** H135. You cannot use this code in your 2023 report.

Updated validation

Select “**Section 10a11: Receives waste from offsite**” if you are:

- A large quantity generator consolidator.
- A treatment, storage, and disposal facility.
- A recycler.
- A [destination facility](#).⁴

How to get help

- Check out our instructions on how to [set up your TurboWaste account](#).⁵
- See our [Dangerous Waste Annual Reporting Guide](#)⁶ for instructions on reporting.
- Manage and view your manifest data by registering for e-Manifest on [EPA's RCRAInfo website](#).⁷
- If you have trouble accessing SecureAccess Washington (SAW), please [contact SAW's Help Team](#).⁸
- Email the Annual Reporting Team at turbowaste@ecy.wa.gov if you need help submitting your report in TurboWaste. ◆

[This page has been intentionally left blank.]

Tier Two reports are due March 1

DIANE FOWLER

Tier Two is an annual inventory of hazardous chemicals and extremely hazardous substances (EHS) used or stored in the workplace that meet or exceed reporting threshold amounts. It's part of Hazardous Chemical Inventory Reporting, commonly known as Tier Two—one of the key reports required under the [Emergency Planning and Community-Right-to-Know Act \(EPCRA\)](#).⁹

Submitting your report

Submit your annual report through Tier Two Online. If you're an existing [SecureAccess Washington](#)¹⁰ user, add this service to your account. If you don't have an account yet, you must [sign up for one](#).¹¹ Each person accessing Tier Two Online must do so through their own SAW account.

Tier Two Online limits access so only users from the business can report. We don't allow consultants to report for your business through Tier Two Online.

If you no longer meet the reporting requirements, please let us know by filling out an [exemption form](#).¹²

How to get Tier Two help

For more information, and to learn how to set up your Tier Two online account, please visit our [Tier Two reporting](#)¹³ webpage. You can contact the EPCRA reporting team at TierTwoOnline@ecy.wa.gov or 800-633-7585, option 1. ♦



New chemicals added to the Toxics Release Inventory list

DIANE FOWLER

EPA added nine new types¹⁴ of per- and polyfluoroalkyl substances (PFAS) and 12 additional chemicals¹⁵ to the Toxics Release Inventory (TRI) list for 2023. Reports for these newly added chemicals are due July 1, 2024.

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

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

EPA can add new chemicals to the TRI list annually. The [current list](#)¹⁶ contains 877 chemicals and 33 chemical categories. This includes 189 unique PFAS chemicals.

If your business uses PFAS containing products, determine if the newly added chemicals are present in the products you manufacture, import, process, or use. If you meet the reporting threshold, submit reports for these chemicals by **July 1, 2024**. Visit [EPA's website](#)¹⁷ to learn more about TRI's reporting requirements.

New PFAS chemicals added for 2023

Chemical name	CAS number
Acetamide, N-(2-aminoethyl)-, 2-[(γ-ω-perfluoro-C4-20-alkyl) thio] derivatives, polymers with N1, N1-dimethyl-1,3-propanediamine, epichlorohydrin and ethylenediamine, oxidized	CAS 2742694-36-4
Acetamide, N-[3-(dimethylamino) propyl]-, 2-[(γ-ω-perfluoro-C4-20-alkyl) thio] derivatives	CAS 2738952-61-7
Acetic acid, 2-[(γ-ω-perfluoro-C4-20-alkyl) thio] derivatives, 2-hydroxypropyl esters	CAS 2744262-09-5
Alcohols, C8-16, γ-ω-perfluoro, reaction products with 1,6-diisocyanatohexane, glycidol and stearyl alcohol	CAS 2728655-42-1
Ammonium perfluorobutanoate	CAS 10495-86-0
Perfluorobutanoate	CAS 45048-62-2
Perfluorobutanoic acid	CAS 375-22-4
Potassium heptafluorobutanoate	CAS 2966-54-3
Sodium perfluorobutanoate	CAS 2218-54-4

PFAS chemicals have a 100-pound reporting threshold for reporting year 2023.

Twelve additional chemicals added for 2023

Chemical name	CAS number
Dibutyltin dichloride	CAS 683-18-1
1,3-dichloro-2-propanol	CAS 96-23-1
Formamide	CAS 75-12-7
1,3,4,6,7,8-Hexahydro-4,6,6,7,8,8-hexamethylcyclopenta[g]-2-benzopyran	CAS 1222-05-5
n-hydroxyethylethylenediamine	CAS 111-41-1
Nitrilotriacetic acid trisodium salt	CAS 5064-31-3
p-(1,1,3,3-Tetramethylbutyl) phenol	CAS 140-66-9
1,2,3-trichlorobenzene	CAS 87-61-6
Triglycidyl isocyanurate	CAS 2451-62-9
Tris(2-chloroethyl) phosphate	CAS 115-96-8
Tris(1,3-dichloro-2-propyl) phosphate	CAS 13674-87-8
Tris(dimethylphenol) phosphate	CAS 25155-23-1

EPA classified one of the chemicals, 1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethylcyclopenta [g]-2-benzopyran, as a persistent, bioaccumulative, and toxic (PBT) chemical. It's also a chemical of special concern with a 100-pound reporting threshold.

The other 11 chemicals are reportable at 25,000 pounds for manufacturing, importing, or processing, or 10,000 pounds for a chemical that is otherwise used.

Plan now for the 2024 reporting year

EPA has classified all PFAS as [Chemicals of Special Concern](#)¹⁸ because they remain in the environment for long periods of time, are not easily destroyed, and build up or accumulate in body tissue. Chemicals of Special Concern also include certain PBT chemicals like lead, mercury, and dioxins.

When reporting under TRI in 2024:

- PFAS will no longer be eligible for the de minimis exemption.
- PFAS will no longer be reportable on Form A.
- There will be limits on range reporting.
- Purchasers will be notified of any amount of PFAS in products they buy.

These changes are effective January 1, 2024, with reports due July 1, 2025.

[Read the final PFAS rule.](#)¹⁹ ◆

How to save money on waste disposal

CHRISTA COLOUZIS

Imagine this: You're cleaning and organizing your stock area and discover 865 buckets of expired adhesives and sealants. You realize they aren't just garbage, so you call a few hazardous waste disposal companies to get disposal quotes—and you're shocked. For proper disposal, one company quotes you \$43,000 and the other, \$116,000.

When this happened to a Washington business owner, he reached out to Ecology. "Am I going about this wrong? I literally can't afford to dispose of the glue the correct way. But I need it gone, and I want to do it right. What can I do?"

We responded with technical assistance. And as it turns out, this company strives to use safer products, so many of their adhesives were not dangerous waste and could be solidified without evaporation and put into the trash—legally.

The business owner used the product safety data sheets to designate each waste and determine which were hazardous and which were not. [Designating waste](#)²⁰ this way is called using **generator knowledge**. It turned out that 604 of the 865 containers were not dangerous waste and could be hardened without evaporation and then landfilled.

This business organized a "glue hardening day" for those 604 buckets. They will dispose of the remaining 261 containers as hazardous waste through a third hazardous

waste disposal company. The quote for proper disposal was \$25,000.

The lessons?

- Designate your wastes—it may not be as bad as you think!
- Use safety data sheets to your advantage.
- Get **multiple** quotes.
- Contact us for technical assistance.

We provide dangerous waste designation guidance. For more information, see our webpage: [Dispose, recycle, or treat dangerous waste](#).²¹ ♦



SMALL CHANGES, **BIG** RESULTS:
OPPORTUNITIES AND
SUCCESS STORIES

Product Replacement Program successes

SEAN SMITH

We're making progress replacing and disposing of products with toxic chemicals—thanks to our innovative Product Replacement Program (PRP). The PRP tackles some of the most harmful chemicals found in everyday products.

PERC in dry cleaning: Thanks to the perchloroethylene (PERC) replacement program, many dry cleaners have happily switched to safer alternatives. Now, these facilities are healthier for business owners, their staff, and customers.

PFAS in firefighting foam: We're examining five options to help Washington's municipal fire departments safely dispose of toxic firefighting foam. We anticipate selecting a disposal option this spring and launching the disposal program soon after. This program will help prevent contamination of our soil and water. We've already provided six commercial airports with state-of-the-art equipment that allows them to test their fire suppression systems without putting harmful foam on the ground.

Solvents in auto degreasers: We reimburse some auto repair shops that switch from solvent-based degreasers to water-based alternatives, making their work safer and more eco-friendly.

Bisphenols in receipt paper: We're addressing the issue of bisphenols in thermal receipts, helping businesses adopt bisphenol-free options before the restriction takes effect in 2026.

Flame retardants in recreational foam: Many gymnastic tumbling pits use foam blocks treated with toxic flame retardants. We're working on a pilot program to replace these blocks with non-toxic alternatives.

PCBs in schools: Although polychlorinated biphenyls (PCBs) were banned decades ago, they can still be found in old buildings and products, such as light ballasts in schools. That's why we have a replacement program for public, private, and tribal K-12 schools to get rid of light ballasts containing PCBs.

The PRP is reducing the use of harmful chemicals in Washington, which means cleaner air and water, and a safer environment for generations to come. If you have questions and want to see if your business, school, or organization qualifies for one of our replacement programs, please visit [our PRP website](#).²²

Waste disposal options: Small and medium quantity generators participating in the PRP may qualify to manage their wastes under the Alternative Standards for Episodic Generation. For more information about planned events, please refer to Ecology's [Episodic generation of dangerous waste webpage](#).²³ ◆

Product replacement projects



PERC in dry cleaning



PFAS in firefighting foam



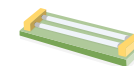
Solvents in auto degreasers



Bisphenols in receipt paper



Flame retardants in recreational foam



PCBs in schools

Free competition between laboratories with cold storage

SASKIA VAN BERGEN

Does your lab use ultra-ultra-low temperature freezers (-80 to -150 °C), ultra-low temperature freezers (-70 °C to -80 °C), lab freezers (-40 °C to -20 °C), or refrigerators? If so, consider participating in the Freezer Challenge run by the [International Institute for Sustainable Laboratories \(I2SL\)](#)²⁴ and [My Green Lab](#).²⁵ The competition ends on **July 1, 2024**.

This challenge encourages laboratories to recognize the benefits of good cold storage management, such as:

- Removing unneeded, unwanted, or non-viable samples from refrigeration units.
- Reducing costs associated with maintaining refrigeration units.
- Improving researcher access to laboratory samples and reagents.
- Developing ongoing cold storage management practices that support energy efficiency and maximize space.

Learn more in [this video](#)²⁶ or on [the competition webpage](#).²⁷ ◆



HELPFUL **GUIDANCE** FOR
DANGEROUS WASTE GENERATORS



Reports:

[Product Replacement Program: 2021–2023](#)²⁸
[Toxics Reduction Program 2022 Annual Report](#)²⁹



Guides:

[Focus on: Treatment by Filtration](#)³⁰
[Toxic Substances and Environmental Justice](#)³¹



Brochures:

[Pollution Prevention Technical Assistance for You](#)³²
[The Connection Between Tires, Fish, and Us](#)³³



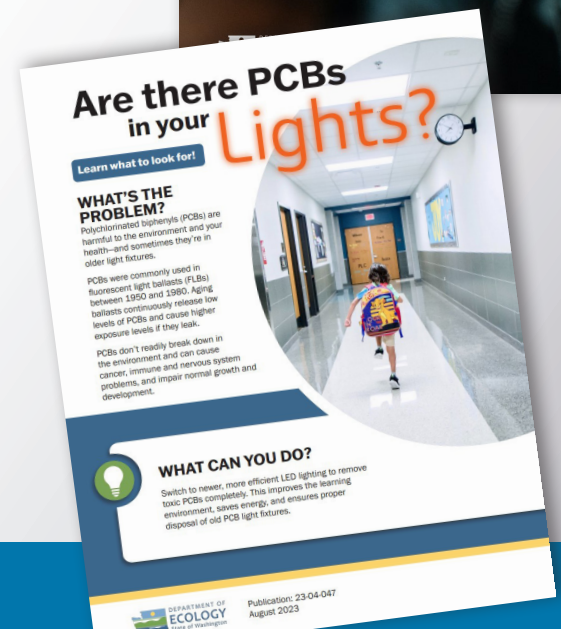
Fact sheets:

[Safer Metalworking Fluids](#)³⁴
[Are There PCBs in Your Lights?](#)³⁵



Posters:

[Five Steps to Switching Auto Shops to Safer Cleaners](#)³⁶



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: OSHA 7225

About:

This course will provide participants with information about and hands-on experience with the process for transitioning to safer chemicals, as well as the key methods, tools, and databases that can assist in this process.

When:

May 6–7, 2024

or

Nov. 12–13, 2024

[Sign up](#)

[Sign up](#)

ENDNOTES

- 1 <https://ecology.wa.gov/DWReport>
- 2 <https://apps.ecology.wa.gov/publications/SummaryPages/2004056.html>
- 3 <https://rcrapublic.epa.gov/rcrainfoweb/action/modules/br/main/broverview>
- 4 Destination facilities are facilities that treat, dispose of, or recycle a particular category of universal waste and are subject all applicable requirements that apply to any hazardous waste treatment, storage and disposal facilities (See 40 CFR sections 273.9 and 273.60).
- 5 <https://apps.ecology.wa.gov/publications/SummaryPages/1904017.html>
- 6 <https://apps.ecology.wa.gov/publications/SummaryPages/2004056.html>
- 7 <https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>
- 8 <https://secureaccess.wa.gov/public/saw/pub/help.do>
- 9 <https://ecology.wa.gov/EPCRA>
- 10 <https://secureaccess.wa.gov/myAccess/saw/logout.do>
- 11 <https://secureaccess.wa.gov/>
- 12 <https://apps.ecology.wa.gov/publications/SummaryPages/ECY070645.html>
- 13 <https://ecology.wa.gov/TierTwo>
- 14 <https://www.epa.gov/toxics-release-inventory-tri-program/addition-certain-pfas-tri-national-defense-authorization-act>
- 15 <https://www.epa.gov/chemicals-under-tsca/epa-adds-12-chemicals-toxics-release-inventory>
- 16 <https://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals>

17 <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities>
18 <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-J/part-372/subpart-B/section-372.28>
19 <https://www.govinfo.gov/content/pkg/FR-2023-10-31/pdf/2023-23413.pdf#page=1>
20 <https://ecology.wa.gov/Designation>
21 <https://ecology.wa.gov/DWdisposal>
22 <https://ecology.wa.gov/ProductReplacement>
23 <https://ecology.wa.gov/EpisodicGeneration>
24 <https://www.i2sl.org/>
25 <https://www.mygreenlab.org/>
26 <https://vimeo.com/781249500/35f4c2b23f>
27 <https://www.freezerchallenge.org/the-challenge.html>
28 <https://apps.ecology.wa.gov/publications/SummaryPages/2304056.html>
29 <https://apps.ecology.wa.gov/publications/SummaryPages/2304021.html>
30 <https://apps.ecology.wa.gov/publications/SummaryPages/2304048.html>
31 <https://apps.ecology.wa.gov/publications/SummaryPages/2304069.html>
32 <https://apps.ecology.wa.gov/publications/SummaryPages/2304049.html>
33 <https://apps.ecology.wa.gov/publications/SummaryPages/2304058.html>
34 <https://apps.ecology.wa.gov/publications/SummaryPages/2304015.html>
35 <https://apps.ecology.wa.gov/publications/SummaryPages/2304047.html>
36 <https://apps.ecology.wa.gov/publications/SummaryPages/2304063.html>

ABOUT SHOPTALK

Publication information

Publication: 24-04-001

Issue: February 2024

Accommodation requests

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