

Shoptalk

SUMMER 2024

In this issue

**NEW FEDERAL LIMITS FOR
PFAS IN DRINKING WATER**

**FIVE WAYS TO REDUCE TOXIC
CHEMICALS AT YOUR BUSINESS**



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Contents

WHAT'S NEW WITH DANGEROUS WASTE TODAY?	3
EPA Sets Maximum Contaminant Levels in Drinking Water for "Forever Chemicals"	4
Use Central Accumulation Areas to Your Advantage!.....	6
Do You Have Investigation-Derived Waste?.....	7
Did You Know Small Businesses Can Use E-Cycle Washington for Free?.....	8
Updated PFAS Disposal Guidance.....	10
SMALL CHANGES, BIG RESULTS: OPPORTUNITIES AND SUCCESS STORIES.....	11
Five Ways to Reduce Toxic Chemicals at Your Business	12
HELPFUL GUIDANCE FOR DANGEROUS WASTE GENERATORS	13
UPCOMING EVENTS & TRAININGS	15
ENDNOTES	17

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

EPA Sets Maximum Contaminant Levels in Drinking Water for “Forever Chemicals”

CHRISTA COLOUZIS AND MICHELLE MYERS

In April 2024, EPA set [new federal limits](#)¹ for five “forever chemicals” in drinking water. The new limits, called Maximum Contaminant Levels (MCLs), are as follows:

- **PFOA:** 4.0 parts per trillion (ppt)
- **PFOS:** 4.0 ppt
- **PFNA:** 10 ppt
- **PFHxS:** 10 ppt
- **GenX:** 10 ppt

To get an idea of just how low 4.0 ppt is, imagine that just one drop of that chemical would contaminate five Olympic-sized swimming pools of water.

What are PFAS?

PFAS is short for per- and polyfluoroalkyl substances. These human-made “forever chemicals” don’t break down naturally. Since the 1950s, PFAS have been widely used because they resist heat, grease, and water. While some manufacturers are transitioning away from PFAS, these chemicals are still used in products such as:



Nonstick cookware.



Water-resistant fabrics (like raincoats, umbrellas, and tents).



Paints and coatings.



Stain-resistant coating (like carpets and furniture).



Personal products (like dental floss, nail polish, mascara, and shampoo).



Floor waxes and polishes.



Firefighting foam.

What harm do they cause?

PFAS are toxic at extremely low levels. They're linked to:

- Kidney and testicular cancers.
- Lowered birth weights.
- Reduced immune response.
- Thyroid and liver disease.
- Higher blood pressure and cholesterol.

Once PFAS are in us, it takes years for our bodies to get rid of them.

Is my drinking water safe?

Washington's public drinking water systems will be tested for PFAS before December 2025. If PFAS are found above a [state action level \(SAL\)](#),² customers must be notified within 30 days, and testing will happen more often.

If you're a private well owner, [consider having your water tested](#).³

What can I do?

- Use cast iron or stainless-steel cookware and retire your non-stick pots and pans.
- Buy products that are certified as safer.
- Avoid using stain- or water-repellent sprays.
- Leave your shoes at the door so you don't track toxic chemicals into your home via dirt and dust.

Here's [more information](#)⁴ about PFAS and reducing your exposure. ◆



Use Central Accumulation Areas to Your Advantage!

JIM PEARSON

When the dangerous waste rules changed in 2019, the term “central accumulation area” (CAA) was added to the regulations. The term CAA covers a variety of previously used informal terms—like final generator accumulation area, 90-day area, 180-day area, and large quantity generator (LQG) accumulation area.

CAAs are defined areas on site where dangerous waste is accumulated. Don't be afraid to use more than one CAA at your site. If you generate waste in different parts of your facility, you can have CAAs in each area. You don't need to use [satellite accumulation areas](#),⁵ although they can be useful.

“Central” doesn't mean a single, centrally located physical location. The term “central” means that generators may consolidate or centralize their dangerous waste from multiple locations. CAAs can be in any location at the generator site if they meet the conditions for the accumulation of dangerous waste.

Requirements for CAAs are generally the same as before 2019. Large quantity generators may accumulate waste in CAAs without a permit if they comply with the requirements of [WAC 173-303-200](#)⁶ and [WAC 173-303-201](#).⁷ Medium quantity generators may accumulate waste in CAAs without a permit if they comply with the requirements of [WAC 173-303-172](#).⁸

For more details about accumulating dangerous waste, see the [Dangerous Waste Regulations](#),⁹ our [Dangerous Waste Accumulation webpage](#),¹⁰ and our [Dangerous Waste Accumulation poster](#).¹¹ ♦



Do You Have Investigation-Derived Waste?

CHRISTA COLOUZIS

We've all seen them—drums left in a vacant lot surrounded by chain link fence. In many cases, these drums are full of investigation-derived waste (IDW). This waste includes the soil, water, and personal protective equipment generated when a business samples the site. Your business might sample to find out:

- **If** the site is contaminated.
- **Where** it's contaminated.
- **What** it's contaminated with.

IDW drums are a common issue because they're routinely left on site longer than allowed by law.

Plan for success

Before you sample your site, consider how the property was used in the past. If the property held a dry cleaner or gas station, odds are good that sampling will generate some dangerous waste. [Designate the waste](#)¹² at the point of generation to see if it is dangerous waste and to ensure proper management and disposal. If the site is contaminated with a listed solvent, the less-contaminated soils may qualify for solid waste disposal if you apply for a [contained-in determination](#).¹³

If you have dangerous waste from an investigation, you must ship it within the time limits that apply to your generator category (for example, 90 days for large quantity generators (LQGs) and 180 days for medium quantity generators). Remember, if these drums contain dangerous waste, they might impact your generator category. It only takes about five drums of dangerous waste soil to put you into the LQG category.

How to label waste pending analysis

Remember, the rules for labeling waste pending analysis have changed.

- Your label must say **“Dangerous Waste Pending Analysis.”**
- The **date** the waste went into the drum.
- The **possible hazards** associated with the waste (like corrosive, flammable, explosive, etc.).

This is different from hazard labeling for known wastes. At the unknown stage, list all the hazards you think might apply. For dangerous waste pending analysis, you can list more than one hazard. Anytime you have questions about how to handle dangerous waste or what is allowed by law, visit the [Hazardous Waste & Toxics Reduction website](#)¹⁴ or call us at 360-407-6700. We'd love to help! ♦



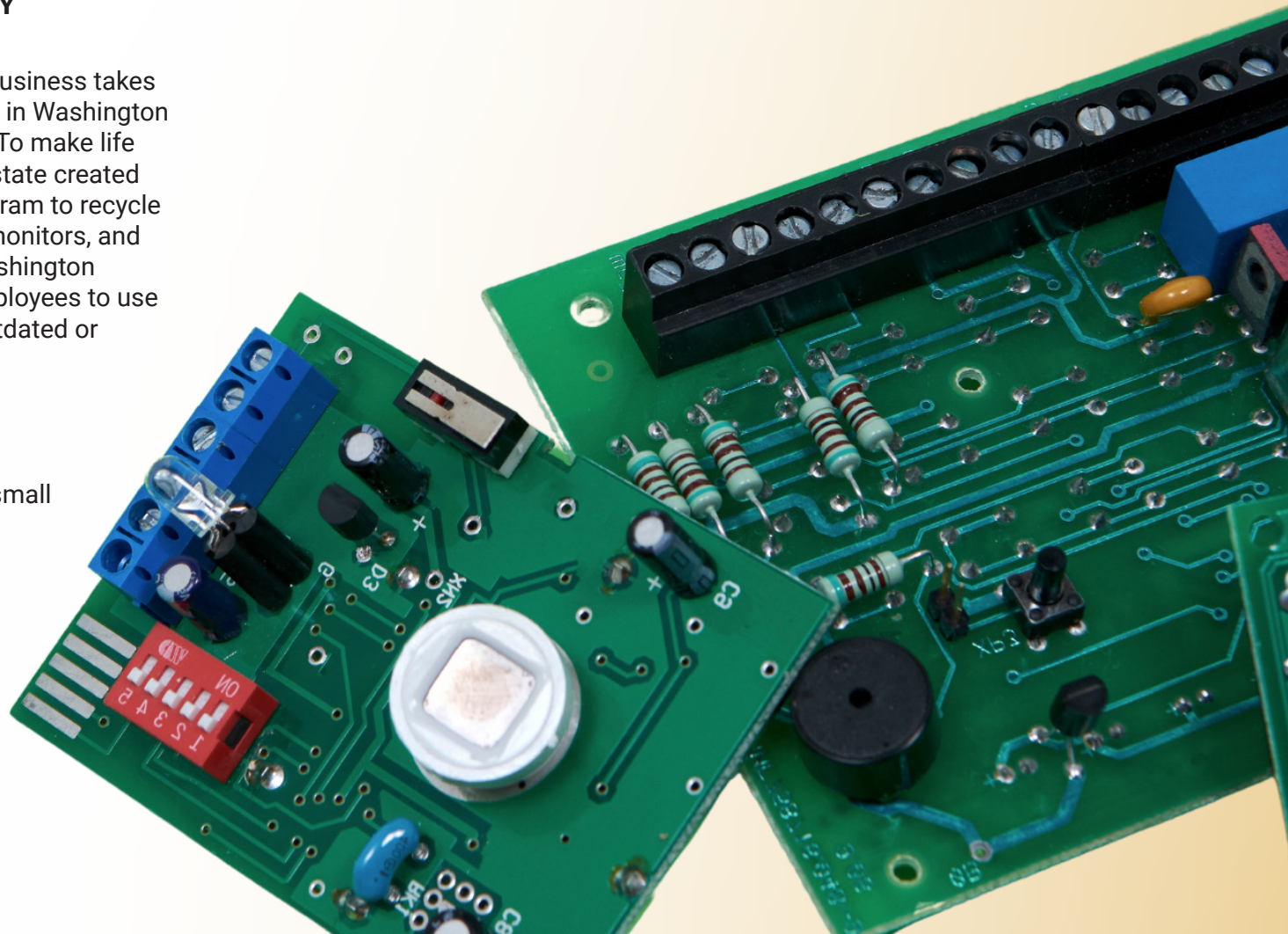
Did You Know Small Businesses Can Use E-Cycle Washington for Free?

WASHINGTON MATERIALS MANAGEMENT AND FINANCING AUTHORITY

Running and sustaining a small business takes work, and small business owners in Washington face numerous daily challenges. To make life easier for these businesses, the state created [E-Cycle Washington](#),¹⁵ a free program to recycle electronics such as computers, monitors, and televisions. We encourage all Washington businesses with less than 50 employees to use E-Cycle to responsibly recycle outdated or unwanted electronics.

How does it work?

There are over 220 drop-off sites across Washington State where small businesses can bring computers, monitors, and televisions, both working and nonworking. Small businesses can drop off up to 10 accepted electronics at these locations for free recycling.



What does my business need to do?

1. Find a drop-off location: Go onto the locator website (ecyclewa.org) and enter the city or ZIP code of your business. You will find the nearest drop-off location and the hours of operation. If no search results appear, try increasing the distance using the drop-down menu that appears after you search.
2. Go to the drop-off location during business hours and give them your accepted products for recycling. (Do not leave items at a drop-off site that is closed.)

Accepted Items:

- Televisions of all types and sizes.
- Computers, including laptops, desktops, and tablets.
- Monitors.
- E-readers and portable DVD players.

If your business needs to drop off 10 or more units for recycling, call the location first to ensure they have room or contact E-Cycle Washington for details at 206-706-5599 or info@wmmfa.net.

If you have unwanted electronics that aren't accepted by E-Cycle, call 1-800-RECYCLE or visit 1800recycle.wa.gov. There may be fees associated with recycling these items.

About E-Cycle Washington

E-Cycle Washington and the Washington Materials Management and Financing Authority (WMMFA) were created by a Washington State law. WMMFA is a "quasi-government" entity that doesn't profit from this program and is prohibited by law from charging for recycling. Since operations began in January 2009, E-Cycle has recycled over 465 million pounds of electronics. ♦



Updated PFAS Disposal Guidance

MYLES PERKINS

On April 8, EPA released updated guidance on destroying and disposing of PFAS and PFAS-containing materials. The [interim guidance](#)¹⁶ provides states with the most up-to-date information that accounts for recent research on the best ways to destroy, dispose of, or store PFAS-related wastes.

Although this guidance doesn't recommend a preferred disposal method, it does help you select the least impactful methods. EPA recognizes the need for more publicly available data to validate existing and new technologies that may be suitable for large-scale use.

This is an update to the 2020 disposal guidance that focused on three existing disposal options:

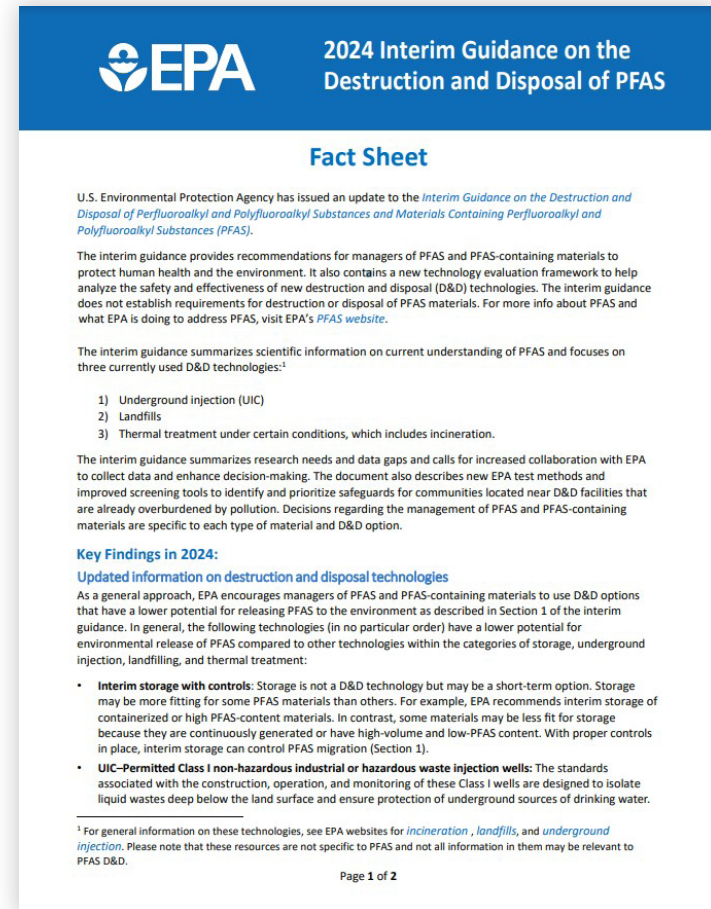
- Underground injections.
- Landfills.
- Thermal treatment.

This new guidance incorporates feedback from public comments, integrates new technologies from the public and private sectors, and highlights emerging technologies that warrant further evaluation.

EPA is accepting comments on the interim guidance for 180 days (until October 2024).

We're currently reviewing public comments on the draft [environmental impact statement](#)¹⁷ (EIS) for Ecology's [PFAS-containing firefighting foam disposal program](#).¹⁸

These comments and other resources like EPA's disposal guidance will inform updates to the EIS. ♦



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

Five Ways to Reduce Toxic Chemicals at Your Business

SASKIA VAN BERGEN

One way we're working to reduce pollution is through [laws](#)¹⁹ that restrict the use of certain toxic chemicals in products. But we also encourage and support the voluntary use of safer chemicals and products in businesses, schools, and other organizations. Check out these five ways you can reduce toxic chemicals at your business.

Ways we can help



1. Browse our website. We have general guidance for businesses on [how to find less hazardous products](#).²⁰



2. Replace specific products. Our product replacement program²¹ helps small businesses transition the products they use to less toxic options. For example, if you work at an autobody shop and use solvent-based degreasers, your organization could qualify for reimbursement to switch to water-based products.



3. Find safer chemical alternatives. For example, if you use solvent-based degreasers containing chemicals of concern and you want to replace them with a safer degreaser, we may be able to fund an opportunity with the [TURI](#)²² Cleaning Laboratory. They can test the performance of several safer options to find what would work for your application.



4. Get certified—and subsidized. Some manufactured products qualify for certification programs. If you manufacture these products, we can help you find ways to reduce or eliminate the use of hazardous chemicals in your products. Sometimes this process can be expensive, which is why we offer [subsidy programs](#)²³ to encourage businesses to certify their products.



5. Ask for support. If you are a business that submits a pollution prevention plan, you can ask your [pollution prevention technical assistance provider](#)²⁴ for support.

For more information, email us at safer.chem@ecy.wa.gov. ♦

HELPFUL **GUIDANCE** FOR
DANGEROUS WASTE GENERATORS



6PPD

[Focus On: Finding Solutions to 6PPD](#)²⁵



Ecology program reports

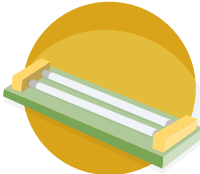
[Toxics Reduction Program: 2023 Annual Report](#)²⁶

[Pollution Prevention Assistance Partnership:
2021–2023 Biennium Report](#)²⁷



Food packaging regulations

[Washington State Waste & Toxics Reduction Laws](#)²⁸



PCBs

[Disposal Options and Requirements for
Polychlorinated Biphenyl Waste](#)²⁹



Resources for manufacturers

[Children's Safe Products Reporting Rule: Product Components](#)³⁰

[Resource for Complying with the Safer Products for
Washington Rule: Electric and Electronic Products](#)³¹



Toxic-Free Cosmetics Act

[A New Washington Law Could Impact Your Business!](#)³²

[Toxic-Free Cosmetics Act Guide: Restrictions for
Cosmetic Industry & Sellers](#)³³

[Chemicals in Cosmetics Used by Washington
Residents: Phase Two Results](#)³⁴

[How Can Apps Help Me Find Safer Products?](#)³⁵

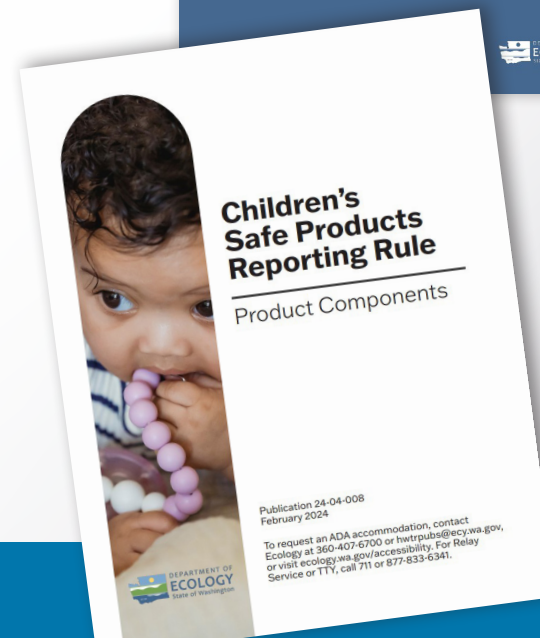


Waste management resources

[Focus on: Treatment by Aldehyde Deactivation](#)³⁶

[Focus on: Domestic Sewage Exclusion](#)³⁷

[Focus on: Treatment by Carbon Adsorption](#)³⁸



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:

Nov. 12–13, 2024

Link:

oshce.uw.edu/courses/course/7225web1124



ENDNOTES

- 1 [epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas](https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas)
- 2 doh.wa.gov/sites/default/files/2023-01/334-473.pdf
- 3 doh.wa.gov/sites/default/files/2022-09/331-700.pdf
- 4 apps.ecology.wa.gov/publications/documents/2004043.pdf
- 5 apps.ecology.wa.gov/publications/SummaryPages/1904029.html
- 6 app.leg.wa.gov/WAC/default.aspx?cite=173-303-200
- 7 app.leg.wa.gov/WAC/default.aspx?cite=173-303-201
- 8 app.leg.wa.gov/WAC/default.aspx?cite=173-303-172
- 9 apps.leg.wa.gov/WAC/default.aspx?cite=173-303
- 10 ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/dangerous-waste-basics/accumulation
- 11 apps.ecology.wa.gov/publications/documents/2004039.pdf
- 12 ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/dangerous-waste-basics/designation
- 13 ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contained-in-Determinations
- 14 ecology.wa.gov/about-us/who-we-are/our-programs/hazardous-waste-toxics-reduction
- 15 ecology.wa.gov/ECycle
- 16 epa.gov/pfas/interim-guidance-destroying-and-disposing-certain-pfas-and-pfas-containing-materials-are-not
- 17 ecology.wa.gov/waste-toxics/reducing-toxic-chemicals/product-replacement-program/afff-disposal/afff-eis
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- 21 ecology.wa.gov/waste-toxics/reducing-toxic-chemicals/product-replacement-program
- 22 [turi.org/Our_Work/Cleaning_Laboratory](https://www.wa.gov/Our_Work/Cleaning_Laboratory)
- 23 ecology.wa.gov/regulations-permits/guidance-technical-assistance/safer-alternatives/safer-chemicals-for-manufacturers/safer-product-certification-subsidy-program
- 24 ecology.wa.gov/regulations-permits/guidance-technical-assistance/pollution-prevention-services/toxics-reduction-assistance/meet-our-team
- 25 apps.ecology.wa.gov/publications/SummaryPages/2404028.html
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- 29 apps.ecology.wa.gov/publications/SummaryPages/2404027.html
- 30 apps.ecology.wa.gov/publications/SummaryPages/2404008.html
- 31 apps.ecology.wa.gov/publications/SummaryPages/2404015.html
- 32 apps.ecology.wa.gov/publications/SummaryPages/2404014.html
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- 34 apps.ecology.wa.gov/publications/SummaryPages/2404022.html
- 35 apps.ecology.wa.gov/publications/SummaryPages/2404005.html
- 36 apps.ecology.wa.gov/publications/SummaryPages/2404010.html
- 37 apps.ecology.wa.gov/publications/SummaryPages/2004041.html
- 38 apps.ecology.wa.gov/publications/SummaryPages/2404033.html

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