

Shoptalk

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Preparing for winter weather in the dangerous waste world

EPA issues its third e-Manifest rule



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

Dangerous waste designation basics

CHRISTA COLOUZIS

What does “**waste designation**” mean? And why is it so important to Ecology inspectors?

Those are great questions!

What is waste designation?

Waste designation is the process used to figure out if your waste is regulated as dangerous waste. So, when you want to get rid of something that might be dangerous waste, it's time to designate. The easiest way to designate your waste is to ask yourself the questions in our [Designation Checklist](#).¹ Your answers will tell you which codes apply to your waste.

What are waste codes?

Waste codes are important so that your employees package the waste correctly and your waste hauler transports the waste in compliance with U.S. Department of Transportation regulations. They also help ensure your waste is treated and disposed of safely. Those codes are on your waste manifest—you'll use the manifests and codes again in February when it's time to submit your [dangerous waste annual report](#)² to Ecology.

Can I have my waste hauler assign codes for me?

Waste haulers can assign the codes for you, and they can be a great resource. But guess what? If

they use the wrong code and something bad happens with the waste, the liability is all yours. That's right, [the law is clear](#)³ on the waste generator's “cradle to grave” responsibility.

Waste designation is important for safe waste handling and storage when you first generate your waste. You don't want to store liquid wastes that react with each other in the same secondary containment...or store shock-sensitive waste next to the paint shaker.

What will I need to get started?

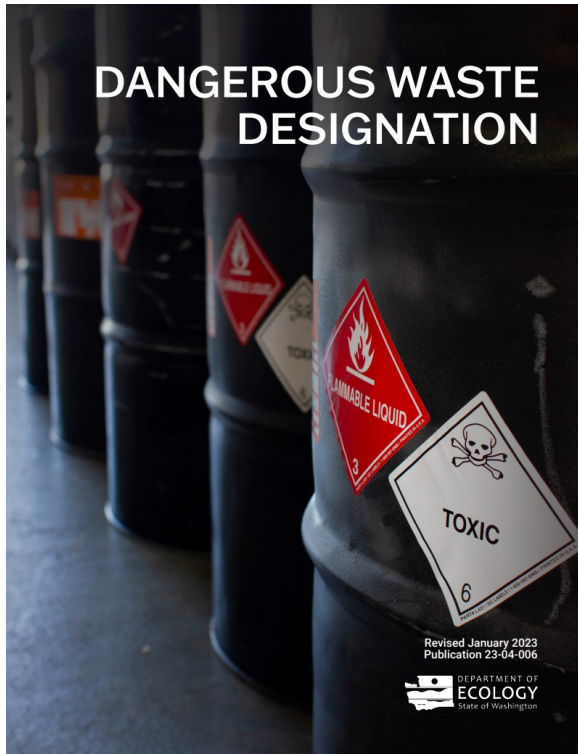
So, you have waste and the [Designation Checklist](#).⁴ You will also need:

1. Knowledge of the process that generated the waste.
2. The Safety Data Sheet (SDS) for each product used in the process.

The SDS tells you about any toxic chemicals that could be present in your waste. Your process knowledge helps you determine if those chemicals end up in the product you're making, the waste, both, or neither. If the SDS lists “trade secret” or “proprietary” ingredients, you may need to contact the manufacturer or [work with a laboratory](#)⁵ to get analytical test results about what your waste contains.

Where can I get more information about dangerous waste designation?

Guide: [Dangerous Waste Designation](#)⁶



Video: [Designate Your Waste—Is It Dangerous?](#)⁷



Webpage: ecology.wa.gov/designation



Two chemicals are now listed Superfund hazardous substances

DIANE FOWLER

On May 8, 2024, EPA named two of the most widely used per- and polyfluoroalkyl substances (PFAS) as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund. The two PFAS chemicals are perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS), and the new designation includes their salts and structural isomers.

Facilities must report PFOA and PFOS releases

The [final rule](#)⁸ requires any person in charge of a vessel or facility to immediately report PFOA and PFOS releases that meet or exceed the reportable quantity of one pound to all of the following entities:

- The National Response Center.
- State or Tribal emergency response commission (SERC/TERC).
- The local or Tribal emergency planning committee (LEPC/TEPC).

[EPCRA](#)⁹ section 304 also requires facilities to submit a follow-up written report to their SERC/TERC and LEPC/TEPC as soon as possible after the release.

Facilities must notify communities

Under CERCLA, owners or operators of any vessel or facility must “provide reasonable notice to potential injured parties by publication in local newspapers serving the affected area” of any release of these substances. Federal agencies that sell or transfer real property must also provide notice of the presence of hazardous substances in certain circumstances.

CERCLA is designed to address and prioritize sites that present risk to human health and the environment. It serves the communities most vulnerable to potential adverse health risks from exposure to contamination.

Disposing of PFOA/PFOS Waste

When disposing of waste that may contain PFOA/PFOS, remember you must determine if it has halogenated organic compounds at levels that could make it a state-only persistent dangerous waste.

For more information

[Designation of Perfluorooctanoic Acid \(PFOA\) and Perfluorooctanesulfonic Acid \(PFOS\) as CERCLA Hazardous Substances \(US EPA\)](#)¹⁰

[Questions and Answers about Designation of PFOA and PFOS as Hazardous Substances under CERCLA \(US EPA\)](#)¹¹



TurboWaste is transitioning to RCRAInfo

SHAWNA GRIFFIN AND ASHLEY HILLIS

If you use TurboWaste, [please take our 3–5 minute survey](#).¹² Read on for more information.

We're switching to RCRAInfo

Every year, we collect reports from about 4,500 dangerous waste generators across the state. We've been using TurboWaste as our dangerous waste reporting platform, but soon we'll move to EPA's [RCRAInfo reporting modules](#).¹³

Here's our expected timeline:

- **January–May 2025:** Use TurboWaste for the 2024 annual report cycle.
- **August–Dec. 2025:** Transition users into RCRAInfo.
- **January 1, 2026:** Begin using RCRAInfo for the 2025 annual report cycle.

We will email a reminder before each of these milestones. **Make sure your contact information is up to date in TurboWaste** because we will email your listed “site contact” with updates.

Why are we making this change?

In recent years, EPA upgraded its hazardous waste reporting system,

RCRAInfo, to gather both federal and state waste data. RCRAInfo uses modern database structures, security, and IT development approaches. Most states use this system to report—Washington is one of nine jurisdictions currently using a separate system to gather data.

Switching to RCRAInfo will simplify the reporting process.

Please take our survey

We know this change affects a lot of people. We want to make sure this transition runs as smoothly as possible, so we'd like your input.

If you currently use TurboWaste, [please take our survey](#).¹⁴ Your responses will help us provide useful guidance about transitioning to RCRAInfo.

More details

If you're curious about what the new RCRAInfo platform looks like, check out this [MyRCRAid training video](#)¹⁵ from the California Department of Toxic Substances Control. If you have questions, [reach out to our annual reporting team](#).¹⁶ ◆



Do you have hazardous materials outside? Here's how to prepare for the winter weather

LIZ KUNZ

Preparing for wet and cold weather is important to prevent damage and environmental hazards at your business. When you have hazardous materials outside, you need to decide whether to **recycle, dispose of, or move the waste** into a secure weatherproof building. Here are a few things to think about as you prepare for the upcoming winter weather.

Decide what to do with your waste

Assess outdoor stockpiles of scrap materials, equipment, vehicles, and chemicals (such as oils, lubricants, solvents, cleaning supplies, and paint). To decide what to do with your dangerous waste, ask yourself these questions:

- **Is the item still usable?** If so, can it be sold or given away through material exchanges such as [IMEX](#)¹⁷ or craigslist?
- **Has the item expired?** Do you no longer use the specific version or formulation of the item? Is the item broken or unusable?
- **Can the item be recycled?** For example, through a [recycling program](#),¹⁸ a county-based small business program, or a waste broker or hauler?

Find a recycling or drop-off site



Paint: [Find a PaintCare drop-off site](#)¹⁹



Electronic waste: [E-Cycle Washington](#)²⁰



Mercury-containing lamps: [Recycle lights for free | LightRecycle Washington](#)²¹



Dangerous waste haulers and used oil recycling facility search: [Waste service providers](#)²²



Moderate risk waste (SQGs only) and household hazardous waste drop-off locations: [Find a disposal site](#)²³

Move waste inside if possible

Consider reducing your overstock and the items in your boneyard to limit your liability. Keep the following in mind:

- **Exposure to heat and sunlight** can degrade materials, resulting in weakened or leaking containers, ruined inventory, and peeling paint.
- **Strong winds, wet snow, and ice** can damage temporary structures and blow over partially full containers.
- **Cold temperatures** can cause liquid waste to freeze, potentially cracking or bursting containers.
- **Heavy rains** can mobilize spills and drips of chemicals in the yard, which carries them into your stormwater drainage system, nearby creeks and wetlands, or dry wells.
- **Rain can accumulate** inside open containers, solubilize dried materials, and create contaminated water that must be [designated](#)²⁴ and disposed of properly. If stored outside, put empty drums on their side with bungs securely closed; if stored upright, rainwater can infiltrate a loose bung.

We can answer your questions

If you're still not sure what to do with your waste, we can help.

- Contact our [Pollution Prevention Assistance](#)²⁵ (PPA) program, a partnership made up of city, county, and state staff. This program assists [small quantity generators](#)²⁶ and businesses who aren't sure what generator category they belong in.
- [Medium and large quantity generators](#):²⁷ Contact our [Pollution Prevention](#)²⁸ (P2) Technical Assistance team, consisting of dedicated staff and engineers. ◆



EPA adds new chemicals to Toxics Release Inventory list

DIANE FOWLER

EPA added [seven new types](#)²⁹ of per- and polyfluoroalkyl substances (PFAS) and one new chemical category ([diisononyl phthalate \[DINP\]](#))³⁰ to the Toxics Release Inventory (TRI) list for 2024. If businesses use enough of a chemical to meet the reporting threshold, they report under TRI annually for any chemical that's listed on the TRI list. Reports for these newly added chemicals are due **July 1, 2025**.

Table 1. Newly reportable Toxic Release Inventory chemicals for the 2024 reporting year.

CAS or Category Number	Toxic Release Inventory Chemical Name
307-24-4	Perfluorohexanoic acid (PFHxA)
422-64-0	Perfluoropropanoic acid (PFPrA)
2923-26-4	Sodium perfluorohexanoate
21615-47-4	Ammonium perfluorohexanoate
82113-65-3	1,1,1-Trifluoro-N-[(trifluoromethyl)sulfonyl] methanesulfonamide (TFSI)
90076-65-6	Lithium bis[(trifluoromethyl)sulfonyl] azanide
2816091-53-7	Betaines, dimethyl(γ - ω -perfluoro- γ -hydro-C8-18-alkyl)
N125	All diisononyl phthalates (DINP), including these CAS numbers and names: <ul style="list-style-type: none"> • 111983-10-9 Bis(3-ethylheptan-2-yl) benzene-1,2-dicarboxylate • 14103-61-8 Bis(3,5,5-trimethylhexyl) phthalate • 20548-62-3 Bis(7-methyloctyl) phthalate • 71549-78-5 Branched dinonyl phthalate • 68515-48-0 Di(C8-10, C9 rich) branched alkyl phthalates • 28553-12-0 Diisononyl phthalate

*DINP category chemicals are reportable at 25,000 pounds for manufacturing, importing, or processing, or 10,000 pounds if "otherwise used."

The list is updated frequently

The National Defense Authorization Act or EPA may add new chemicals to the TRI list annually. The [current list](#)³¹ contains 884 chemicals and 34 chemical categories. This includes 196 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, 2025. Visit [EPA's website](#)³² to learn more about TRI's reporting requirements.

Changes to reporting rules

There have been many changes to PFAS reporting rules in recent years. Below is a summary of changes in effect for reporting year 2024 (reports due July 1, 2025):

- All PFAS added to TRI by the [2020 National Defense Authorization Act](#)³³ are designated as “chemicals of special concern” and have lower reporting thresholds (100 pounds).
- PFAS are not eligible for the de minimis exemption. This includes supplier notification requirements.
- Suppliers must notify purchasers of any amount of PFAS in products they buy.
- PFAS cannot be reported on Form A.
- There are limits on range reporting.

EPA has classified all PFAS as chemicals of special

concern because they remain in the environment for long periods, are not easily destroyed, and build up or accumulate in body tissue. Chemicals of special concern also include lead, mercury, and dioxins, which also persist in the environment, bioaccumulate, and are toxic.

For more information

[Federal Register: Changes to Reporting Requirements for Per- and Polyfluoroalkyl Substances and to Supplier Notifications for Chemicals of Special Concern; Community Right-to-Know Toxic Chemical Release Reporting](#)³⁴ ◆

EPA issues its third e-Manifest rule

JIM PEARSON

On July 26, 2024, EPA issued its [third e-Manifest rule](#).³⁵ This rule integrates hazardous waste exports, exception reports, discrepancy reports, unmanifested waste reports, and PCB manifesting requirements into the RCRAInfo data system.

Although the rule is not yet part of the dangerous waste regulations, you must still comply with it, and EPA will enforce it when necessary. This article will help you understand what you need to do to comply with this rule.

The new rule:

- Requires Washington Large and Medium Quantity Generators (federal Large and Small Quantity Generators) to register in RCRAInfo for access to e-Manifest to obtain their final signed manifest copies from the system. **Note: RCRAInfo accounts are for individuals and cannot be shared.**
- Requires entities to correct manifest data errors.
- Integrates exception reports, discrepancy reports, and unmanifested waste reports into e-Manifest.
- Incorporates hazardous waste export manifests into the e-Manifest system.
- Makes conforming changes to polychlorinated biphenyl manifest regulations under the Toxic Substances Control Act.
- Makes other technical corrections to remove obsolete requirements, correct typographical errors, establish definitions, and/or improve alignment with the e-Manifest program.

The rule goes into effect on **Jan. 22, 2025**. However, the following will not go into effect until Dec. 1, 2025:

- Requirements associated with the collection of hazardous waste export manifests in the e-Manifest system.
- Use of electronic manifests for hazardous waste export shipments.
- Use of electronic exception, discrepancy, and unmanifested waste reports.

Benefits

The e-Manifest system provides generators some benefits:

- Although generators can still use paper manifests, you don't need to keep manifest copies on site when you can see them in RCRAInfo.
- You can show your final electronic manifests (e-Manifests) in the e-Manifest system to Ecology inspectors.
- Manifest errors can be corrected online by you, your transporter, or your TSD.
- Manifests will be readily available to help complete your Dangerous Waste Annual Report.
- After Dec. 1, 2025, you will be able to submit exception, discrepancy, and unmanifested waste reports online, rather than sending them to Ecology.

Generator categories

When looking at information from EPA, remember that Ecology uses different names for your generator category. Where EPA uses the term SQG, Washington uses MQGs. And where EPA uses VSQG, Washington uses SQG.

EPA (Federal)	Ecology (Washington State)
LQG: Large quantity generator	LQG: Large quantity generator
SQG: Small quantity generator	MQG: Medium quantity generator
VSQG: Very small quantity generator	SQG: Small quantity generator

Washington LQGs and MQGs

LQGs and MQGs must have an e-Manifest account in RCRAInfo by **Jan. 22, 2025**. The account must be set up as either a site manager (preferred) or a certifier. To register, go to rcrainfo.epa.gov, create a free account as an industry user, and request access to your site or sites. Note: RCRAInfo accounts are for individuals and cannot be shared. Everyone at your site who needs to see or work with manifests must have their own account, but not everyone needs to be a site manager. Please see EPA's [e-Manifest User Registration webpage](#)³⁶ and [e-Manifest FAQs](#)³⁷ for more details. If you need more help, you can contact the e-Manifest Help Desk for Industry Users:

- 8:00 am – 6:00 pm ET
- Call Toll-Free: (833) 501-6826 or Direct Line: (970) 494-5508
- Email: helpdesk@epacdx.net

Washington Small Quantity Generators (SQGs)

Although EPA does not require Washington State SQGs (VSQG in federal terms) to register for e-Manifest, SQGs need to have an account to submit annual reports when Ecology transitions to RCRAInfo late next year. For more information, see our Shoptalk article in this issue: [TurboWaste is transitioning to RCRAInfo](#). Until registered in e-Manifest, SQGs must arrange with their receiving facilities to receive paper copies of completed manifests. ◆

Reminder: EPCRA Tier Two reports are due March 1

DIANE FOWLER

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

Submitting your report

Submit your annual report through Tier Two Online. If you're an existing [SecureAccess Washington \(SAW\)](#)³⁸ user, add this service to your account. If you don't have an account yet, you must [sign up for one](#).³⁹ Each person accessing Tier Two Online must do so through their own SAW account. Tier Two Online limits access so only the business's users 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](#).⁴⁰

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 webpage](#).⁴¹ You can contact the EPCRA reporting team at TierTwoOnline@ecy.wa.gov or 800-633-7585, option 1. ♦



HELPFUL **GUIDANCE** FOR
DANGEROUS WASTE GENERATORS

Publications



Boat paints

[Antifouling Paints in Washington State: Third Report to the Legislature](#)⁴²



Firefighting foam

[Best Management Practices for Deep Cleaning Fire Equipment Contaminated with PFAS-Containing Firefighting Foam in Washington State](#)⁴³



Toxic-Free Cosmetics Act

[Chemical Facts for Cosmetologists: Formaldehyde & Formaldehyde Releasers](#)⁴⁴



Waste management

[Focus on: Treatment by Separation](#)⁴⁵

[Focus on: Treatment by Evaporation](#)⁴⁶

[Guide to Universal Waste](#)⁴⁷

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.

PCB Awareness & Removal Workshop (Virtual)

About:

Join us to learn about PCBs (polychlorinated biphenyls) in buildings and their safe removal. Supported by the Washington State Department of Ecology, EPA, and in partnership with Pacific Rim Environmental, this comprehensive workshop will cover the dangers and risks of PCBs, their impact on health and the environment, and best practices for identifying, handling, and disposing of PCB-containing materials.

When:

[Nov. 19, 2024: 2–4 pm](#)⁴⁸

[Dec. 4, 2024: 2–4 pm](#)⁴⁹

ENDNOTES

- 1 <https://apps.ecology.wa.gov/publications/SummaryPages/1604028.html>
- 2 <https://ecology.wa.gov/DWReport>
- 3 <https://apps.leg.wa.gov/rcw/default.aspx?cite=70A.300>
- 4 <https://apps.ecology.wa.gov/publications/SummaryPages/1604028.html>
- 5 <https://ecology.wa.gov/LaboratorySearch>
- 6 <https://apps.ecology.wa.gov/publications/SummaryPages/2304006.html>
- 7 <https://www.youtube.com/watch?v=MuuQK8ILQM4>
- 8 <https://www.govinfo.gov/content/pkg/FR-2024-05-08/pdf/2024-08547.pdf>
- 9 <https://www.epa.gov/epcra>
- 10 <https://www.epa.gov/superfund/designation-perfluorooctanoic-acid-pfoa-and-perfluorooctanesulfonic-acid-pfos-cercla>
- 11 <https://www.epa.gov/superfund/questions-and-answers-about-designation-pfoa-and-pfos-hazardous-substances-under-cercla#requirements>
- 12 <https://forms.office.com/pages/responsepage.aspx?id=F-LQEU4mCkCLoFfcwSfXLQPFoZsz37tGmhrC9ulTs8FUOUQwSTFFRzBSS0xEMkFHQUJaM1M4S1AwSS4u&route=shorturl>
- 13 <https://www.epa.gov/enviro/rcrainfo-overview>
- 14 <https://forms.office.com/pages/responsepage.aspx?id=F-LQEU4mCkCLoFfcwSfXLQPFoZsz37tGmhrC9ulTs8FUOUQwSTFFRzBSS0xEMkFHQUJaM1M4S1AwSS4u&route=shorturl>
- 15 <https://www.youtube.com/watch?v=vEaIDVDEP-0>
- 16 <mailto:turbowaste@ecy.wa.gov?subject=Moving%20to%20RCRAInfo%20-%20follow%20up%20questions>
- 17 <https://kingcountyhazwastewa.gov/en/business-disposal/imex>
- 18 <https://ecology.wa.gov/waste-toxics/reducing-recycling-waste/our-recycling-programs>
- 19 <https://www.paintcare.org/drop-off-sites/>
- 20 <https://ecyclewa.org/>
- 21 <https://www.lightrecycle.org/>
- 22 <https://ecology.wa.gov/DWdisposal>
- 23 <https://ecology.wa.gov/FindSiteHHW>

24 <https://ecology.wa.gov/Designation>
25 <https://ecology.wa.gov/PPA>
26 <https://ecology.wa.gov/SQG>
27 <https://ecology.wa.gov/generatorcategory>
28 <https://ecology.wa.gov/P2A>
29 <https://www.federalregister.gov/documents/2024/05/17/2024-10568/implementing-statutory-addition-of-certain-per--and-polyfluoroalkyl-substances-pfas-to-the-toxics>
30 <https://www.epa.gov/toxics-release-inventory-tri-program/addition-diisononyl-phthalate-category-rule>
31 <https://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals>
32 <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities>
33 <https://www.epa.gov/toxics-release-inventory-tri-program/addition-certain-pfas-tri-national-defense-authorization-act>
34 <https://www.federalregister.gov/documents/2023/10/31/2023-23413/changes-to-reporting-requirements-for-per--and-polyfluoroalkyl-substances-and-to-supplier>
35 <https://www.epa.gov/e-manifest/final-rule-integrating-e-manifest-exports-and-other-manifest-related-reports-pcb>
36 <https://www.epa.gov/e-manifest/e-manifest-user-registration>
37 <https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest>
38 <https://secureaccess.wa.gov/myAccess/saw/logout.do>
39 <https://secureaccess.wa.gov/public/saw/pub/displayRegister.do>
40 <https://apps.ecology.wa.gov/publications/SummaryPages/ECY070645.html>
41 <https://ecology.wa.gov/TierTwo>
42 <https://apps.ecology.wa.gov/publications/SummaryPages/2404034.html>
43 <https://apps.ecology.wa.gov/publications/SummaryPages/2404042.html>
44 <https://apps.ecology.wa.gov/publications/SummaryPages/2404039.html>
45 <https://apps.ecology.wa.gov/publications/SummaryPages/2404044.html>
46 <https://apps.ecology.wa.gov/publications/SummaryPages/2404031.html>
47 <https://apps.ecology.wa.gov/publications/SummaryPages/2104017.html>
48 <https://www.eventbrite.com/e/pcb-awareness-removal-workshop-virtual-registration-950941881767?aff=oddtcreator>
49 <https://www.eventbrite.com/e/pcb-awareness-removal-workshop-registration-950925211907?aff=erelpanelorg>

ABOUT SHOPTALK

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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.

