

# **Pollution Prevention** Assistance Partnership

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2021-2023 Biennium Report

April 2024 Publication 24-04-016

# PUBLICATION INFORMATION

This document is available on the Department of Ecology's website at: https://apps.ecology.wa.gov/publications/summarypages/2404016.html

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### ACCESSIBILITY

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# MEET THE PARTNERSHIP

In 2007, the Washington State Legislature funded the Local Source Control partnership. This pollution prevention assistance program helps small businesses reduce and manage potential wastes to protect water, soil, and air quality.

In 2016, we renamed the partnership to Pollution Prevention Assistance (PPA). This new name emphasizes how the program benefits the public and businesses. The PPA connects and trains local, regional, and state specialists to solve pollution prevention problems at the source.

The PPA partnership includes specialists from local jurisdictions throughout Washington cities, counties, and health districts.

Through interagency agreements with the Department of Ecology:

- Local jurisdictions get funding to provide free, one-on-one technical assistance to small businesses.
- Local jurisdictions' specialists teach businesses how to:
  - Manage their wastes properly.
  - Help diagnose and fix stormwater-related issues.
- Specialists provide help with complicated regulatory issues.

The PPA partnership is not an enforcement program. Businesses aren't subject to fines or administrative orders from this program.

### WHAT IS POLLUTION PREVENTION ASSISTANCE?

**PPA** is a technical assistance program that helps small quantity generators prevent pollution.

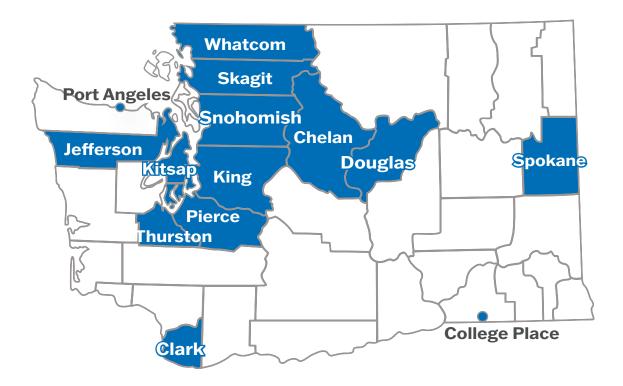
**The problem**: Small businesses often have limited access to expert help on stormwater management or hazardous waste handling and disposal. Hands-on assistance and regulatory advice are hard to find.

**The solution**: PPA specialists in participating jurisdictions offer free, on-site technical assistance to help small businesses identify and fix possible pollution concerns. This assistance and regulatory advice reduces health risks for employees and prevents pollution from harming Washington's environment and communities.

#### **PPA helps businesses**:

- Adopt safer material-handling and storage practices.
- Learn how to properly recycle and dispose of waste in their area.
- Use fewer toxic chemicals in their processes or replace them with safer alternatives.
- Plan for spill prevention and preparedness.
- Manage interior and exterior drainage systems to reduce impacts to stormwater.

### PARTNER JURISDICTIONS



During the 2021–2023 biennium, PPA partnerships included 65 specialists from 28 counties and health districts. PPA partners were in three critical areas: Puget Sound, the Columbia River Basin, and the Spokane River Basin.

Small businesses in other counties who are interested in participating in these programs can reach out to Ecology to get similar kinds of technical assistance.

### 2021-2023 PARTNER JURISDICTIONS

**Chelan County** Chelan-Douglas Health District

**Clallam County** City of Port Angeles

**Clark County** Clark County Department of Public Works Clark County Public Health City of Vancouver

**Douglas County** Chelan-Douglas County Health District

Island County Island County Public Health

Jefferson County Jefferson County Public Health

King County City of Bothell City of Issaquah City of Kirkland City of Redmond City of Renton City of Shoreline King County Water and Land Resources Division Seattle Public Utilities **Kitsap County** Kitsap Public Health District

**Pierce County** City of Lakewood City of Puyallup City of Sumner Tacoma-Pierce County Health Department

**Skagit County** Skagit County Department of Public Health

**Snohomish County** Snohomish Health District

**Spokane County** Spokane Regional Health District

**Thurston County** Thurston County Public Health

Walla Walla County City of College Place

Whatcom County City of Bellingham Whatcom County Health Department

### INDUSTRIES SERVED

PPA specialists serve most industries. During the 2021–2023 biennium, some of the most common industries served were:



Restaurants, cafes, and bars.



Automotive repair facilities including body shops.



Commercial and personal laundry services.



Gas stations with convenience stores.



Hotels (except casino hotels) and motels.



Supermarkets and other grocery stores.



Landscaping companies.



Elementary and secondary schools.

### TECHNICAL ASSISTANCE VISITS

In the 2021–2023 biennium, PPA specialists made 7,661 visits to businesses in Washington. Businesses with more complex or higher-priority issues often received multiple visits.

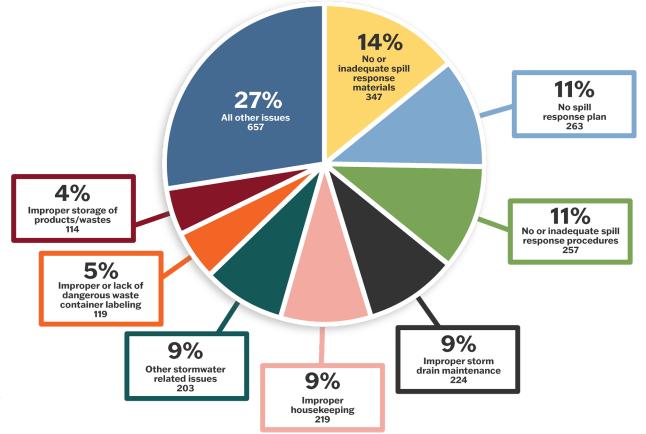
While some businesses contact the PPA partnership, most visits are initiated by specialists. Each partner runs their own local outreach program, which can include social media, emails, mailed letters, phone calls, community events, or drop-in visits. Because the PPA program is voluntary, specialists inform businesses of the program and promote the program's benefits when arranging a visit.

Specialists look closely at a business's practices and then offer solutions when practices could pollute the environment. They recommend ways to comply with local and state regulations and suggest safer alternatives to the hazardous materials the businesses use, store, and dispose of every day. This advice contributes to a safer environment for employees and customers—and often saves the business money.

### ISSUES AND RESOLUTIONS IN THE 2021-2023 BIENNIUM

Specialists found 2,599 issues in 28 categories. By the end of the biennium, they helped resolve 75 percent (1,942) of the issues. The eight most common issues were:

- No or inadequate spill response materials: 347 (14%)
- No spill response plan: 263 (11%)
- No or inadequate spill response procedures: 257 (11%)
- Improper storm drain maintenance: 224 (9%)
- Improper housekeeping: 219 (9%)
- Other stormwater-related issues: 203 (9%)
- Improper or lack of dangerous waste container labeling: 119 (5%)
- Improper storage of products/wastes: 114 (4%)



We consider some issues high priority because they have the highest risk of harming human health or the environment. The **top five high-priority issues** found are:

- Improper storage of products/wastes: 114 (4%)
- Improperly stored dangerous waste: 86 (3%)
- Discharging processed wastewater to storm drains: 76 (3%)
- Improperly stored containerized materials: 62 (2%)
- Waste not disposed of properly: 59 (2%)

Some issues can be remedied quickly, such as properly labeling containers or having a spill kit. Other issues can take more time and money, like rearranging storage areas to provide cover, or changing vehicle washing stations so that only rain goes down the storm drain.

In their non-enforcement role, specialists work with businesses to address issues in a way that makes sense environmentally and economically, even if that takes some time. Specialists work with resources from Ecology or other agencies to find innovative solutions. Unresolved issues are only referred to enforcement agencies if the business no longer makes efforts to address them and they pose a serious threat to human health and the environment. If businesses continue to work with their specialists, there shouldn't be enforcement actions for any identified issues.

### TRAINING FOR PPA SPECIALISTS

Specialists must understand and communicate the regulatory requirements for waste handling and processes. They must understand best management practices that apply to a wide range of businesses.

Ecology developed and continues to improve PPA specialist training:

- **2019–2021 biennium**: Ecology and the PPA training committee developed a self-training system for new specialists.
- **2021–2023 biennium**: 40 specialists completed the trainings and provided feedback.
- **2023–2025 biennium**: Ecology will review these modules based on that feedback.

New specialists must also participate in live virtual discussion panels every other month for their first year. These panels allow them to ask Ecology staff and experienced specialists questions and analyze scenarios they may encounter in the field.



All specialists have access to Ecology staff expertise, creating a broad system of information exchange and enhancing assistance to businesses. Ecology provides contact information for all the specialists and facilitates conversations through online and inperson events. Communication between partners and Ecology allows for collaboration across the partnership between new and experienced specialists. No specialists are on their own. We are one big team!

To support PPA specialists, we:

- Provide regular training opportunities to foster their continued education.
- Host semi-annual all-staff trainings to give specialists a chance to learn about best management practices and regulatory updates.
- Facilitate up to nine webinars per year. These webinars keep specialists up-to-date on changing regulations and introduce new topics. Partner jurisdictions or other agencies often present during the webinars, which allows for a wide array of topics and points of view.

### SMALL CHANGE VOUCHER PROGRAM

PPA's Small Change Voucher is a reimbursement program. We provide up to \$500 per business, per year for pollution prevention expenses. Because the voucher is flexible, partners can work with businesses to find tailored solutions to pollution issues. The voucher helps businesses make changes and protect the business, their employees, the public, and the environment.

#### SMALL CHANGE VOUCHER SUCCESS STORIES

#### **King County**

Located outside of Woodinville, near the Sammamish River, Viva Farms provides training on sustainable organic farming to resource-limited farmers. More than 1,000 farmers, 15 percent of whom are Spanishspeaking, have learned about sustainable organic farming through Viva Farms' bilingual programs. During a January 2023 PPA visit, King County specialists noticed that dangerous materials, like gasoline and fertilizer, weren't stored in secondary containment. In addition, they were stored outside, where containers can degrade and leak, exposing farmers, the public, and the environment to dangerous wastes or chemicals.

King County staff worked with Viva Farms to identify solutions and used the Small Change Voucher to reimburse the purchase of secondary containment and tarps. Today, Viva Farms stores their chemicals in large totes and uses tarps to create temporary storage areas outside so materials are protected from the rain. In addition to buying storage totes and tarps, using the Small Change Voucher helped build a relationship between King County and Viva Farms. King County continues to collaborate with Viva Farms to provide outreach on pollution prevention practices to farmers in training.





#### **City of Redmond**

A new manager at a local floor cleaner manufacturer discovered twelve waste drums at their facility. The PPA specialist requested that the manager dispose of the waste properly, but the business was concerned about cost. When the specialist told the manager about the Small Change Voucher, she was happy to learn that funds were available and said it would help make the case to her boss.

The PPA specialist worked with the manager over several months to address the disposal and other action items found during the initial PPA visit. After follow-up visits and email communication, the manager sent the PPA specialist the receipt for the disposal of the drums, and the specialist worked with her agency's accounting department for voucher reimbursement. The voucher incentive helped remove a barrier to proper disposal.





#### **Kitsap Public Health District**

In March 2023, Jakob Hughes of the Kitsap Public Health District visited Rolling Bay Automotive on Bainbridge Island. Throughout the site visit, Jakob and the site contact discussed how the business would benefit from an oil receiver. Instead of using open-topped drain pans to collect and move oil around the shop, an oil receiver is a closed container that would cut down on potential spills. While an oil receiver would help protect the environment, it didn't fit into the business's budget.

Jakob thought this would be a perfect use of the voucher program and issued a Small Change Voucher for an oil receiver along with the needed accessories, like drain funnels and pans. In April 2023, Jakob received copies of receipts and verified the equipment was in use. Kitsap Public Health District was able to immediately send the reimbursement check to the business, without needing to do additional paperwork through Ecology or the Office of Financial Management. As of this report, Rolling Bay Automotive continues use of these products at their shop.



### PARTNER SUCCESS STORIES PORT ANGELES: RUDDELL AUTO

In early June 2023, the City of Port Angeles performed a PPA visit at Ruddell Auto, the largest car dealership in the city. In addition to car sales, full-service maintenance and repair is performed on site. Along with other pollution prevention issues, they found a highpriority environmental issue: the dealership performed vehicle washes outside and discharged the resulting wash water into a nearby stormwater catch basin. Vehicles were washed in this area for several years.

The issue was mentioned to managers at the dealership. At the time, they didn't know that wash water from vehicle washes shouldn't enter the stormwater system. This was an excellent opportunity for education. Port Angeles PPA specialists explained the difference between stormwater and sanitary wastewater systems, and the importance of keeping wash water out of the stormwater system. The dealership's managers were attentive and receptive to the information.

The PPA specialists requested that Ruddell Auto quickly develop a plan to stop discharging wash water into the municipal separate storm sewer system and perform vehicle washes in an area that either drains into a sanitary sewer or into a water reclamation system. The PPA specialists thoroughly inspected the drainage infrastructure and found a better area for vehicle washes by identifying a concrete pad with a drain connected to the sanitary sewer. This area may have been originally designed for washing vehicles, but this was forgotten over time.

Ruddell Auto's managers were able to move vehicle washing operations within a few days, and all wash water is now discharged to the city's sanitary system.





#### **CITY OF VANCOUVER:** KASO PLASTICS

In March of 2023, PPA specialists Brett Raunig and Nicole Esposito visited a local plastic manufacturing company named Kaso Plastics.

During the site visit, they noted the business did not have secondary containment for hydraulic oil. The specialists also had housekeeping concerns about plastic chips around the loading dock. Brett and Nicole explained to the manager that the chips contaminate the catch basin and stormwater system located under the dumpster. They provided the company with secondary containment and guidance on the housekeeping needed to protect the stormwater infrastructure.

The manager appreciated the technical assistance visit and free secondary containment pallet.

On a follow-up visit, PPA specialists checked on the housekeeping progress and reminded the business of their stormwater responsibilities. In July, they received photos showing the hydraulic oil being properly stored on secondary containment pallets. The company also moved the dumpster, thoroughly cleaned the loading dock area, and placed a filter fabric insert into the catch basin.

Recently, the facility had to relocate the dumpster over the loading dock storm drain again. Now they know the regulatory requirements they need to meet and the environmental impact they could have. As a result, they increased their cleaning and filter replacement frequency. They also implemented a weekly sweep of their loading dock area to keep it free of small plastics and other debris.





#### **KITSAP** PUBLIC HEALTH DISTRICT

On April 25, 2023, the Kitsap Public Health District (KPHD) performed a PPA visit at Orchard Place in the Southworth area of Port Orchard. Orchard Place is a multi-business complex that is home to Blue Agave Mexican Grill and Alan's Country Cafe.

The restaurants share the same dumpster. Fats, oils, and grease (FOG) containers are located behind the complex, near a stormwater drain. The dumpster area was littered with garbage, built-up FOG, and unmarked 55-gallon drums. PPA specialist Thomas Jury worked with Kitsap County's stormwater division to test for contaminants. Test results were below regulatory limits, but the FOG and other garbage could still impact human health and the environment, especially if they reached the nearby Puget Sound.

The garbage debris, spilled FOG, and contaminated soil needed to be removed and disposed of properly. Thomas also asked the businesses to close the gate to the dumpster area and keep it locked to prevent future illegal dumping.

On May 22, 2023, Thomas followed up with the business managers. The two business owners worked together to hire a contractor. The contractor removed and properly disposed of the garbage and contaminated soil. Once all the debris was properly cleaned, Waste Management removed the dumpsters so they could clean underneath them. The contractor pressure washed the area, properly capturing all solids for disposal, and brought the site back into compliance.





### PRODUCT REPLACEMENT PROGRAM

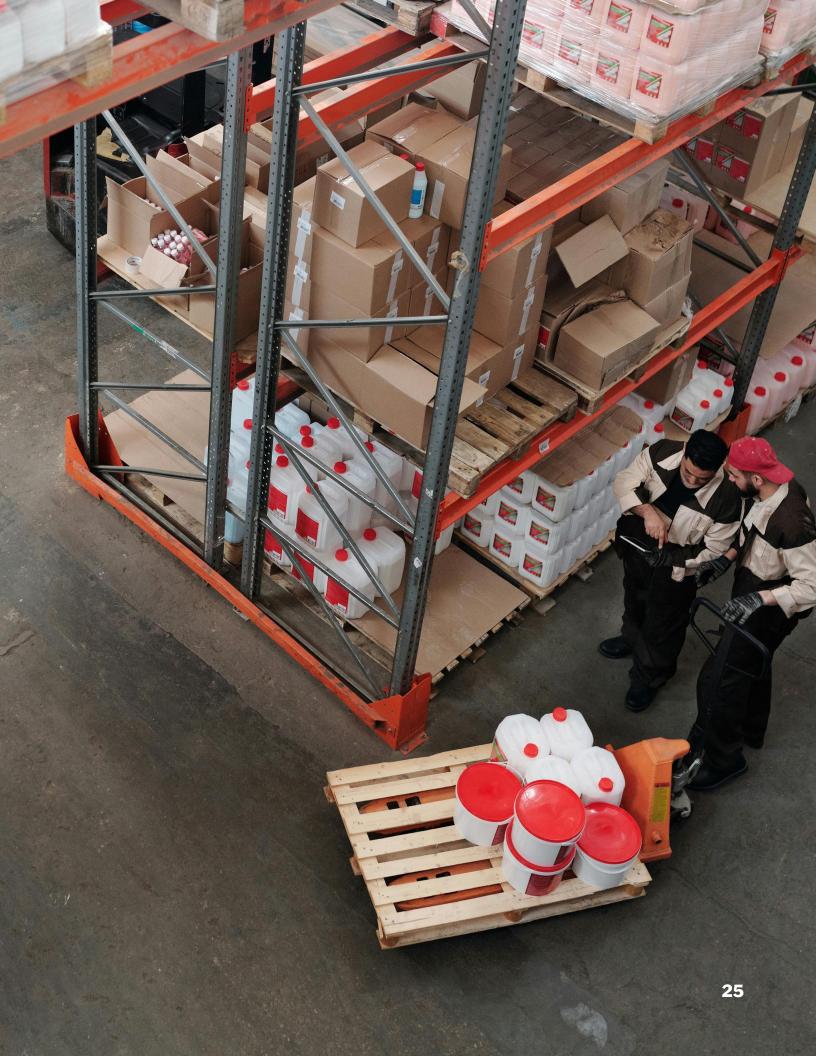
Our Product Replacement Program (PRP) is a cutting-edge, preventative program that identifies and reduces problematic chemicals impacting Washington. This program allows us to proactively address problems before they become bigger and more costly to clean up. It provides:

- Reimbursement funding for eligible businesses.
- Opportunities for businesses to transition to less toxic options.

PPA specialists are critical for PRP's success. They support PRP efforts by providing on-the-ground assistance to businesses and organizations, answering questions about the program, explaining the project terms and conditions, assisting with paperwork, and providing technical assistance and advice on process changes.

Over the last biennium, PPA specialists contacted more than 250 businesses and organizations. These contacts raise awareness and increase participation in the various PRP projects.

During the time, the PRP made significant strides to protect the environment and public health from the worst-of-the-worst product and chemical combinations. Specifically, the PRP achieved the following milestones.





#### PERC DRY CLEANING

From July 1, 2021 to June 30, 2023, Ecology and the PPA specialists worked with 23 businesses to either replace or decommission their PERC dry cleaning machines. Machines were replaced with either professional wet cleaning, the preferred technology, or with high flash hydrocarbon.

A follow-up survey to these businesses' owners gave the program a satisfaction rating of 4.4 out of 5 stars. This program will continue to provide reimbursements until all dry cleaners that want to convert to safer products have made the transition or until funding runs out.



### AUTO DEGREASERS

Ecology has helped more than 100 automotive repair shops transition from dangerous solvents to less hazardous alternatives. An additional 240 are currently transitioning.

On average, shops received around \$5,000 in reimbursement funding to switch, usually covering 75 to 100 percent of the cost.

- Shops choose their alternative degreaser and become eligible for more reimbursement if they choose safer products.
- The most common alternative is <u>EPA Safer Choice</u><sup>1</sup> certified, the highest, most preferred replacement product type—eligible for up to \$10,000.

Reimbursement funding might help PPA specialists get their foot in the door, but the specialists are irreplaceable. They walk the business through the paperwork, address any issues, and continue to follow up with the facility. PPA specialists perform almost all in-person visits for this program, from introducing the voucher to confirming the alternative is being used by the facility.

The automotive degreaser reimbursement program will continue as long as there are auto shops interested in switching, and funding is available to reimburse them.

<sup>1</sup> epa.gov/saferchoice



# PCB LIGHT REPLACEMENT IN SCHOOLS

One school has successfully applied for and received reimbursement for replacing old lights that contain PCBs.

The program has received limited response, even though Ecology and Department of Health:

- Advertised or discussed the program with several school districts and school-related groups.
- Expanded the program to include private schools and daycare centers.
- Offered an increased reimbursement amount of \$50,000 to Tribal schools.

School officials indicated they lack the resources and capacity to conduct the work themselves or to contract out the work. To address this barrier, the PRP plans to hire a qualified contractor who will connect with schools and conduct identification, replacement, and disposal work.



#### BISPHENOL THERMAL RECEIPT REPLACEMENT

Thermal receipts that contain bisphenols (like BPA or BPS) are toxic and associated with health conditions such as:

- Reproductive issues.
- Hormonal imbalances.
- Cardiovascular problems.
- Developmental abnormalities.
- Insulin resistance.

Because of risks associated with BPA and BPS, the manufacture, sale, and distribution of thermal receipts containing intentionally added bisphenols will be prohibited in Washington State beginning January 1, 2026.

The PRP has a project designed to assist businesses with switching to bisphenol-free thermal receipts before the ban takes effect. Qualifying businesses may take advantage of one of three tiers for reimbursement:

- \$150 for thermal receipts free from intentionally added bisphenols.
- \$250 for thermal receipts that have been certified by a robust material health assessment such as GreenScreen Certified<sup>™</sup>.
- Up to \$1,000 for a receiptless point-of-sale device.

PPA specialists can offer this PRP to businesses during their regular site visits.



#### FLAME-RETARDANT RECREATIONAL FOAM PILOT PROJECT

From a survey sent out to Washington gymnastics facilities in 2020, the PRP identified two eligible gyms to participate in the flame-retardant recreational foam pilot project. This pilot project will:

- Work with gyms to test and designate their foam waste for proper disposal.
- Conduct an intensive cleaning of their foam pits after foam removal.
- Provide replacement foam that is free of intentionally added flame retardants.

This process will help us determine the feasibility and funding requirements for a future reimbursement program. We will also identify barriers and opportunities for future flame-retardant foam replacements.

### CONCLUSION & LOOKING FORWARD

#### **IMPACTS FROM COVID-19**

In the 2021–2023 biennium, PPA specialists returned to some normalcy after several years of COVID-19 impacting their work. Partners got out into the field with regularity, and we increased the total number of visits compared to the previous biennium.

### NPDES CHANGES

The National Pollutant Discharge Elimination System (NPDES) permit program is a federal program that addresses water pollution by regulating point sources that discharge pollutants to waters of the United States. NPDES Phase II permit requirements came into effect on January 1, 2023. This new set of requirements affects our partners in different ways. Partners implementing the new regulations for the first time have encountered challenges when doing PPA and NPDES visits.

An internal workgroup was formed within the PPA partnership to help those jurisdictions manage the overlap of the two programs. Ecology will continue to work with our partners to help implement the PPA and NPDES rules and regulations in their jurisdictions.

### TRAINING AND COLLABORATION

In spring of 2023, the partnership hosted the first in-person all-staff training since 2019 and benefited from getting together in person. The partnership is challenged with personnel turnover at partner agencies. Any opportunity to meet face-to-face makes it easier to collaborate and more comfortable for specialists to reach out to each other to discuss issues encountered in the field. Ecology also hosted a table at the biennial municipal stormwater conference MuniCon, resulting in great discussions with potential partners.

Going forward, we will continue to offer one in-person training per year to continue building personal connections to improve collaboration. We also host a virtual training each year.

#### NEW PARTNERS AND NEW PRODUCT REPLACEMENT PROGRAMS

During the 2023–2025 biennium, Ecology is adding the City of Federal Way, the City of Longview, and the Grant County Health District to the partnership. We look forward to working with them to implement the PPA program in their jurisdictions.

Our Product Replacement Program is working to launch a few new programs during the 2023–2025 biennium. One program will assist cosmetology schools and businesses with finding and using safer alternatives. We will also work with school science labs to clean out old chemicals used for lab demonstrations or replace school demonstrations and experiments with green chemistry to reduce exposure to harmful chemicals.

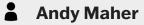
We look forward to another biennium working with our partners to bring pollution prevention assistance to small businesses in Washington State.







### **QUESTIONS?** CONTACT US!



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