

Shoptalk

WINTER 2025

In this issue:

How to recycle your mercury-containing lights—for free!

Is your facility prepared for potential emergencies?



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ABOUT SHOPTALK

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

Mercury-Containing Lamps: Free Recycling and Future Sales Ban

LAUREN SMITH

All used bulbs **must** be [recycled](#),¹ and thanks to a program called LightRecycle, people and businesses that purchase bulbs at retail in Washington can recycle mercury-containing lights for **free** by dropping them off at [collection sites](#)² throughout the state.

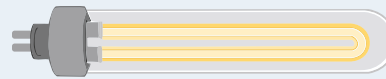
Mercury-containing lights accepted



Screw-based compact fluorescent lights (CFLs)

CFLs are known for their corkscrew design but also come in a wide range of shapes, sizes, and styles. Please note, unlimited recycling only applies to CFLs that have a screw base.

Recycling limit: An **unlimited** number of CFLs can be delivered to a collection site each day.



Pin-based fluorescent tubes

Straight or linear fluorescent tubes come in different lengths (such as 8 feet, 4 feet, or shorter) and widths (such as T5s, T8s, or T12s). Fluorescent tubes must be pin-based, and may also be U-shaped, curved, or circular in design.

Recycling limit: 15 per day.



High-intensity discharge (HID)

HID lamps come in a variety of shapes and sizes. HID lamp types include high-pressure sodium, mercury vapor, metal halide, ultraviolet (UV), ultra-high performance (UHP), and germicidal.

Recycling limit: 2 per day.



Ban on sale of mercury-containing lights

We recommend switching to LEDs if you are planning any lighting projects. The sale of most mercury-containing lights in Washington State will be banned beginning in **2029**, and the collection program will end by **2035**.

For more details on the sales ban and changes to the recycling program read our [focus sheet](#).³

Can all businesses use the free disposal?

If Washington businesses—whether large or small—purchased their [mercury-containing lights](#)⁴ at a retail store in Washington, they can recycle them just like individuals who buy bulbs in Washington. This is because the LightRecycle program is funded by an environmental handling charge assessed on the retail sale of each mercury-containing light.

Businesses must manage lights as universal waste if:

- They didn't purchase the lights at retail in Washington (such as wholesale).
- They exceed the daily bulb limits.

Helpful resources

- [Mercury lights: LightRecycle | Washington State Department of Ecology](#)⁵
- [Recycle lights for free | LightRecycle Washington](#)⁶
- [Lights & lamps | Washington State Department of Ecology](#)⁷
- [Universal waste | Washington State Department of Ecology](#)⁸ ◆

Emergency Preparedness Requirements for Medium Quantity Generators of Dangerous Waste

GARRET PECK

Medium quantity generators (MQGs) must attempt to make emergency preparedness arrangements with the local fire department, emergency response teams, local hospitals, and other necessary emergency responders. These arrangements ensure an effective response to emergencies involving dangerous waste. You must keep records confirming these arrangements or document attempts to make them. Ecology may require you to provide these records during a dangerous waste compliance inspection.

Key emergency preparedness requirements for MQGs

- **Assess service needs:** Determine the potential need for emergency services based on the type and amount of waste stored at the facility.
- **Notify relevant authorities:** Communicate the identified needs to local police, fire departments, equipment suppliers, and hospitals, as appropriate.
- **Familiarize responders:** Plan to educate emergency responders about the properties and hazards of the dangerous wastes handled at the facility.
- **Designate emergency authority:** Identify a primary emergency authority when multiple parties may respond to an incident.
- **Maintain documentation:** Keep detailed records of arrangements made with emergency responders or attempts to make such arrangements.
- **Seek a waiver:** Facilities with 24-hour response capabilities may seek a waiver from the local authority responsible for enforcing the fire code. If obtained, keep a record of the waiver for compliance purposes.
- **Provide required equipment** in all areas where you generate or store dangerous waste, including communication devices, alarms, fire extinguishers, and decontamination equipment.

For a complete list of requirements for MQGs, please refer to [WAC 173-303-172](#).⁹

Compliance challenges and solutions

During dangerous waste compliance inspections, some MQGs try to show their compliance by providing [EPCRA Tier Two](#)¹⁰ Community Right-to-Know documentation. However, this documentation doesn't fulfill the emergency preparedness requirements under the Dangerous Waste Regulations for MQGs and may result in a citation.

If local authorities don't respond to your attempts to make arrangements, you can use certified mail to notify them about your dangerous waste activities and potential service needs. This approach provides proof of delivery and ensures compliance with emergency preparedness requirements, even without a response from local authorities. ♦

Corrosive
Base (8)
Storage



Dangerous Waste Annual Reporting

ANNUAL REPORTING TEAM

Reporting season has arrived—and that means it’s time to submit your Dangerous Waste Annual Report. Reports are due by March 1.

What’s new this year?

Improved usability and process flow in TurboWaste:

- Large quantity generator closure validations.
- New waste code text box for data entry.
- e-Manifest requirements under the Final Third Rule (more details below).

What do you need to do?

Submit your 2024 data accurately. We may reach out to you after you submit your report to make the necessary corrections.

If your site submits Generation and Management (GM) forms, make sure that:

- All ID numbers and names of facilities you sent your waste to or 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 accurately reflect your site’s waste management processes.
- Source codes entered are correct for each waste stream.

Read our [Dangerous Waste Annual Reporting Guide](#)¹¹ for more information.

EPA’s Final Third Rule

Large and medium quantity generators

EPA’s [Final Third Rule](#)¹² requires large and medium quantity generators to **register a Site Manager or e-Manifest Certifier in RCRAInfo** starting Jan. 22, 2025. This is necessary to access the e-Manifest system.

Small quantity generators

Although EPA doesn’t require small quantity generators (VSQGs in federal terms) to register for e-Manifest, you’ll need an account to submit annual reports when Ecology transitions to RCRAInfo early next year.

- For more information about roles and responsibilities, see [EPA’s frequent questions about e-Manifest](#).¹³
- Industry users can reach out to the EPA’s help desk for assistance with RCRAInfo:
 - **Toll-free** at 833-501-6826
 - **Direct line** at 970-494-5508
 - **Email** at helpdesk@epacdx.net

For help with your site registration, please reach out to the Annual Report team.

Need help?

- Read our [Dangerous Waste Annual Reporting Guide](#).¹⁴
- Read our instructions on how to [set up your SAW and TurboWaste accounts](#).¹⁵
- Email the Annual Reporting Team at turbowaste@ecy.wa.gov or call 800-874-2022.
- Contact [SAW's Help Team](#)¹⁶ if you have any trouble accessing SAW.

We're here to help you succeed in completing your report accurately and on time! ♦

EPA Adds More Chemicals to Toxics Release Inventory: Key Updates and Reporting Deadlines

DIANE FOWLER

EPA added [seven PFAS](#)¹⁷ and the [diisononyl phthalate \(DINP\) category](#)¹⁸ to the Toxics Release Inventory (TRI) list for 2024.

PFAS

Reports for these PFAS are **due July 1, 2025**:

- **1,1,1-Trifluoro-N-[(trifluoromethyl)sulfonyl]methanesulfonamide** (CAS: 82113-65-3)
- **Ammonium perfluorohexanoate** (CAS: 21615-47-4)
- **Betaines, dimethyl(.gamma.-.omega.-perfluoro-.gamma.-hydro-C8-18-alkyl)** (CAS: 2816091-53-7)
- **Lithium bis[(trifluoromethyl)sulfonyl]azanide** (CAS: 90076-65-6)
- **Perfluorohexanoic acid** (CAS: 307-24-4)
- **Perfluoropropanoic acid** (CAS: 422-64-0)
- **Sodium perfluorohexanoate** (CAS: 2923-26-4)

DINP

This category includes:

- **Bis(3-ethylheptan-2-yl) benzene-1,2-dicarboxylate** (CAS: 111983-10-9)
- **Bis(3,5,5-trimethylhexyl) phthalate** (CAS: 14103-61-8)
- **Bis(7-methyloctyl) phthalate** (CAS: 20548-62-3)
- **Branched dinonyl phthalate** (CAS: 71549-78-5)
- **Di(C8-10, C9 rich) branched alkyl phthalates** (CAS: 68515-48-0)
- **Diisononyl phthalate** (CAS: 28553-12-0)

Reporting PFAS under TRI

PFAS are classified as **Chemicals of Special Concern**. When reporting PFAS under TRI:

- The de minimis exemption has been eliminated. Now, even small concentrations of PFAS count toward the 100-pound threshold.
- PFAS can no longer be reported on Form A.
- There are limits on range reporting.

Plan now for the 2026 reporting year

EPA added nine new per- and polyfluoroalkyl substances (PFAS) to the TRI list for **2025**:

- **Acetic acid, [(γ-ω-perfluoro-C8-10-alkyl)thio] derivs., Bu esters** (CAS: 3030471-22-5)
- **Ammonium perfluorodecanoate** (PFDA NH₄) (CAS: 3108-42-7)
- **Perfluoro-3-methoxypropanoic acid** (CAS: 377-73-1)
- **Sodium perfluorodecanoate** (PFDA-Na) (CAS: 3830-45-3)
- **6:2 Fluorotelomer sulfonate acid** (CAS: 27619-97-2)
- **6:2 Fluorotelomer sulfonate anion** (CAS: 425670-75-3)
- **6:2 Fluorotelomer sulfonate potassium salt** (CAS: 59587-38-1)
- **6:2 Fluorotelomer sulfonate ammonium salt** (CAS: 59587-39-2)
- **6:2 Fluorotelomer sulfonate sodium salt** (CAS: 27619-94-9)

Compliance steps

- 1. Notify** purchasers of any amount of PFAS in your products.
- 2. Identify** any chemicals that are subject to TRI reporting.
- 3. Report** by **July 1, 2026**, if PFAS amounts exceed the 100-pound threshold.

PFAS rules

PFAS reporting rules have changed a lot in recent years. EPA adds new chemicals to the [TRI list](#)¹⁹ annually. To help answer your reporting questions, they have compiled a [list of PFAS resources](#).²⁰ You can stay informed about EPA's TRI regulatory activities on their [website](#).²¹ ♦

EPA Updates Its “List of Lists”

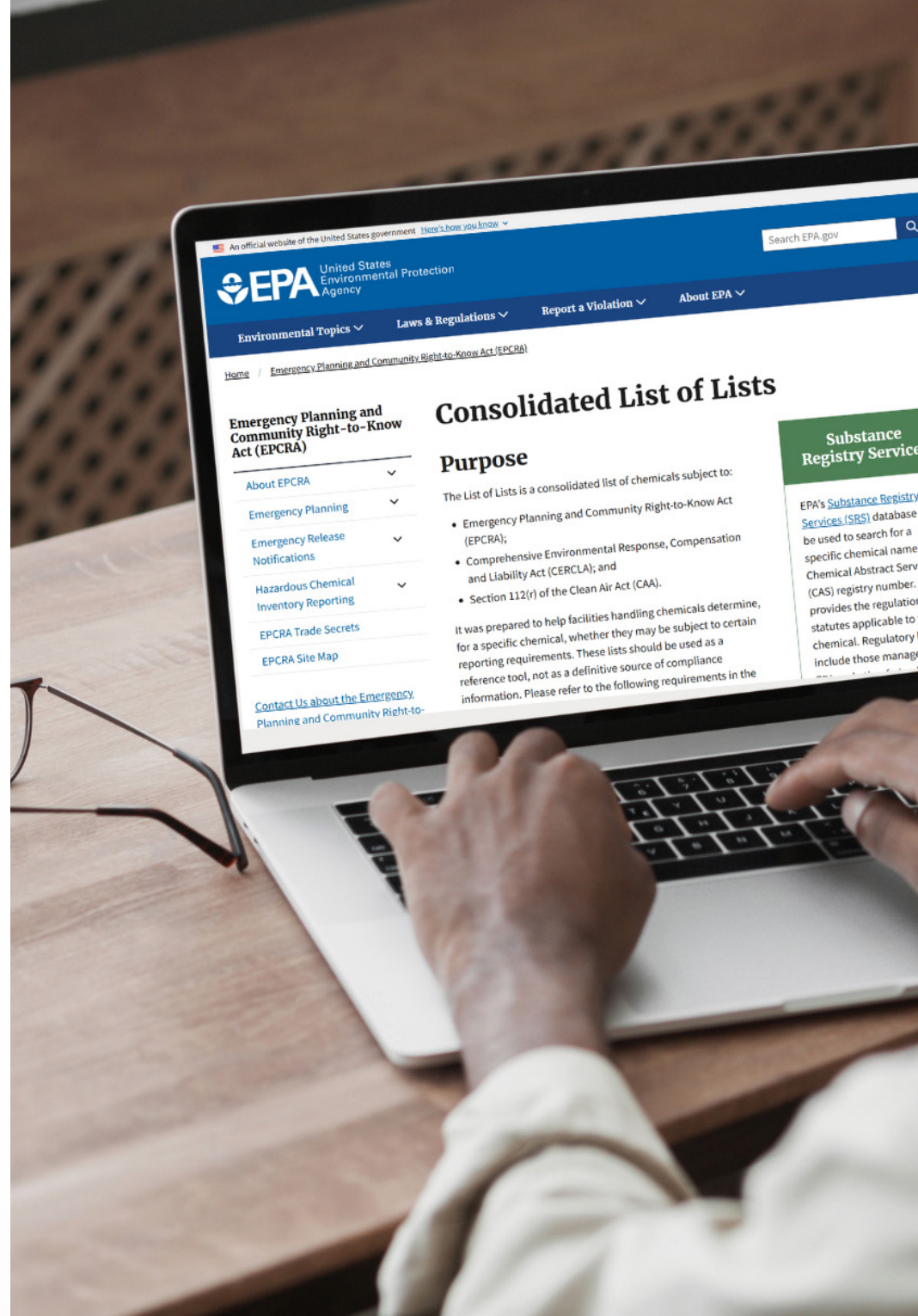
DIANE FOWLER

EPA updated its [Consolidated List of Lists](#)²² in October 2024. Commonly referred to as the “List of Lists,” this resource helps businesses determine if they have chemicals that meet reporting requirements under:

- Emergency Planning and Community Right-to-Know Act (EPCRA),
- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA),
- Section 112(r) of the Clean Air Act (CAA), and, for the first time,
- Clean Water Act (CWA).

Businesses familiar with this resource will notice the new version:

- **Has a new look:** It’s reformatted into a landscape view for improved readability.
- **Covers more programs:** Clean Water Act chemicals are included for the first time.
- **Links to new information:** Each chemical is now linked to the [CompTox Chemicals Dashboard](#)²³ to provide details about chemical structure, hazard and exposure information, environmental fate and transport, and more!





How to use the list for EPCRA reporting

EPCRA 302

Chemicals considered to be extremely hazardous substances, or EHS, are identified under the column EPCRA 302 EHS RQ (reportable quantity). If you have an EHS in amounts that equal or exceed its reportable quantity, you must [notify](#)²⁴ the State Emergency Response Commission (SERC) and your local emergency planning committee ([LEPC](#)²⁵) within 60 days and identify the emergency contact at your business.

EPCRA 312 Tier Two

Most chemicals or products are reportable on the annual [Tier Two](#)²⁶ report if you have 10,000 pounds or more on site at any one time. However, chemicals considered to be extremely hazardous substances, or EHS, have lower reporting thresholds. Use the List of Lists to identify EHS by looking at the column labeled EPCRA 302 EHS RQ. If your chemical has a number listed in this column, it means the chemical is an EHS and the number is its reportable quantity for Tier Two reporting (or 500 pounds, whichever is less).

EPCRA 313 Toxics Release Inventory (TRI)

Chemicals reportable under [TRI](#)²⁷ are identified under EPCRA 313 TRI and in the appendices.

EPCRA 304 release reporting

If you have a chemical release that meets or exceeds the value listed under EPCRA 304 EHS RQ, then you must notify the SERC by calling the Emergency Management Department's Duty Officer at 1-800-258-5990 and your [LEPC](#).²⁸ If the chemical is also a hazardous substance under CERCLA (see CERCLA HS RQ), you must also notify the National Response Center by calling 1-800-424-8802. Send a [written follow-up](#)²⁹ within 30 days.

Visit EPA's [EPCRA](#)³⁰ webpage for more information. ◆

EPA's New Rules on Phase-Out of Perchloroethylene (PERC) and Ecology's PERC Replacement Program

SEAN SMITH

Two big steps toward cleaner air and healthier communities

EPA recently announced [new rules](#)³¹ phasing out the use of perchloroethylene (PERC), also known as PCE, a toxic solvent commonly used in dry cleaning. In December 2024, EPA issued a [risk management rule](#)³² under the Toxic Substances Control Act (TSCA) to address the harmful effects of PERC on both human health and the environment.

Exposure to PERC, particularly in workplaces like dry cleaning shops, is linked to [health concerns](#)³³ like cancer and damage to the liver and kidneys. These new rules are a significant step in reducing these risks by encouraging the transition to safer alternatives. **Dry cleaners must begin phasing out PERC by June 2025, and the use of PERC will be completely banned by 2034.**

Supporting the transition

To help with the transition, our [Product Replacement Program](#)³⁴ offers Washington dry cleaning businesses financial assistance of up to \$40,000 to help replace PERC with safer cleaning technologies. To date, more than 80 Washington dry cleaners made the switch with assistance from the PERC replacement program. The program is funded through the end of June 2025. Contact us soon at ProductReplacement@ecy.wa.gov if your business needs financial assistance to switch to safer cleaners.

A more sustainable future

Together, the EPA's new phase-out rules and Ecology's PERC replacement program signal an important shift toward safer, more sustainable practices in the dry-cleaning industry. With these initiatives, the future of dry cleaning looks cleaner and greener, benefiting both the environment and public health.

To learn more about Ecology's PERC Replacement Program, please visit [our website](#).³⁵ ◆



Tier Two Reporting Reminder

DIANE FOWLER

Tier Two reports are due March 1.

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 requirements. It's a key report required under the [Emergency Planning and Community Right-to-Know Act \(EPCRA\)](#).³⁶

Submitting your report

Submit your annual report through [Tier Two Online](#).³⁷ If you have an existing [SecureAccess Washington \(SAW\)](#)³⁸ account in your name, add this service to your account. If you don't have an account yet, [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 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, let us know by filling out an [exemption form](#).⁴⁰

How to get Tier Two help

For more information, or to learn how to set up your Tier Two Online account, visit our [Tier Two reporting webpage](#).⁴¹ You can contact the EPCRA reporting team at TierTwoOnline@ecy.wa.gov or EPCRA@ecy.wa.gov. ♦

HELPFUL **GUIDANCE** FOR
DANGEROUS WASTE GENERATORS

Publications



6PPD

[6PPD Action Plan and Alternatives Assessment: Progress Report and Recommendations](#)⁴²



Cosmetics

[Policy Statement: Interim Policy on Lead in Cosmetics](#)⁴³

[Take the Detective Work Out of Choosing Safer Cosmetics](#)⁴⁴

[Toxic-Free Cosmetics Act Compliance & Outreach Questions and Answers](#)⁴⁵



Firefighting foam

[Aqueous Film-Forming Foam Collection and Disposal Program: Fact Sheet and Summary](#)⁴⁶

[Aqueous Film-Forming Foam Collection and Disposal Program: Final Programmatic Environmental Impact Statement](#)⁴⁷



PFAS

[PFAS Statewide Funding Strategy: Four-Year Plan for Prevention, Reduction, and Mitigation in Washington State](#)⁴⁸

[Decreasing Use of PFAS in Food Packaging in Washington State](#)⁴⁹



Safer Products for Washington

[Draft Identification of Priority Products Report to the Legislature: Safer Products for Washington Cycle 2 Implementation Phase 2](#)⁵⁰



Waste Management

[Dangerous Waste Annual Reporting Instructions: 2024 Reporting Guide](#)⁵¹

[Guide to On-Site Distillation](#)⁵²

[Pollution Prevention Assistance Partnership Application](#)⁵³

[Focus on: Lithium-Ion Batteries](#)⁵⁴

[Basics of Managing Used Oil in Washington State](#)⁵⁵

ENDNOTES

- 1 <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.505.080>
- 2 <https://www.lightrecycle.org/collection-site-locator/>
- 3 <https://apps.ecology.wa.gov/publications/SummaryPages/2507006.html>
- 4 <https://app.leg.wa.gov/rcw/default.aspx?cite=70A.505>
- 5 <https://ecology.wa.gov/waste-toxics/reducing-recycling-waste/our-recycling-programs/mercury-lights>
- 6 <https://www.lightrecycle.org/>
- 7 <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Lights-Lamps>
- 8 <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/common-dangerous-waste/universal-waste>
- 9 <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-172>
- 10 <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Emergency-Planning-Community-Right-to-Know-Act/Tier-Two-reporting>
- 11 <https://apps.ecology.wa.gov/publications/SummaryPages/2004056.html>
- 12 <https://www.epa.gov/e-manifest/final-rule-integrating-e-manifest-exports-and-other-manifest-related-reports-pcb>
- 13 <https://www.epa.gov/e-manifest/frequent-questions-about-e-manifest#generators>
- 14 <https://apps.ecology.wa.gov/publications/SummaryPages/2004056.html>
- 15 <https://apps.ecology.wa.gov/publications/SummaryPages/1904017.html>
- 16 <https://secureaccess.wa.gov/public/saw/pub/help.do>
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- 18 <https://www.federalregister.gov/documents/2023/07/14/2023-14642/addition-of-diisononyl-phthalate-category-community-right-to-know-toxic-chemical-release-reporting>
- 19 <https://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals>
- 20 https://guideme.epa.gov/ords/guideme_ext/f?p=guideme:gd-title:::::title:pfas_resources
- 21 <https://www.epa.gov/toxics-release-inventory-tri-program/tri-laws-and-regulatory-activities>
- 22 <https://www.epa.gov/epcra/consolidated-list-lists>
- 23 <https://www.epa.gov/comptox-tools/comptox-chemicals-dashboard>
- 24 <https://apps.ecology.wa.gov/publications/summarypages/ecy070305.html>
- 25 <https://ecology.wa.gov/regulations-permits/reporting-requirements/emergency-planning-community-right-to-know-act/local-emergency-planning-committees>
- 26 <https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Emergency-Planning-Community-Right-to-Know-Act/Tier-Two-reporting>

27 <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities>

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33 <https://www.health.ny.gov/environmental/chemicals/tetrachloroethene/>

34 <https://ecology.wa.gov/waste-toxics/reducing-toxic-chemicals/product-replacement-program>

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36 <https://ecology.wa.gov/regulations-permits/reporting-requirements/emergency-planning-community-right-to-know-act>

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40 <https://apps.ecology.wa.gov/publications/SummaryPages/ECY070645.html>

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