

Shoptalk

SUMMER 2025



About Shoptalk

Publication: 25-04-002

May 2025

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.

Contents

What's new with dangerous waste today?	5
From Powder to Part: Handling 3D Printing Waste	6
New Federal e-Manifest Rule Creates Timeline Changes	8
EPA Consolidated List of Lists—Error Notice	9
TRI Reporting Reminder.....	10
Helpful guidance for dangerous waste generators.....	13
Our most used resources!	14
New or updated publications.....	16

**What's new with
dangerous waste today?**

From Powder to Part: Handling 3D Printing Waste

KATY HARVEY

Additive manufacturing, also called 3D printing, allows users to produce customized parts on demand. The process involves building products layer by layer, using only the amount of material needed. You can 3D-print parts using materials such as composites, metals, ceramics, and plastics. If you're using **metal powder bed fusion (PBF) 3D printers**, it's important to know what happens to the leftover materials. Here's what you need to know about the PBF printing process, the waste it leaves behind, and how to properly take care of it.

How 3D printing works

PBF machines use lasers or electron beams to melt and join thin layers of metal to make finished parts. Common metal powders include aluminum, stainless steel, and titanium. Leftover metal powder that isn't fused can be reused on site for later prints—if it isn't contaminated. To keep powder clean and usable, it can often be sieved or filtered to remove impurities. If you don't plan to reuse leftover metal powder, you can **safely collect it in a waste collection bin located inside or attached to the machine. Metal condensate (metal vapor that cools and forms tiny solid particles)** is often collected in the same waste bin after it's filtered inside the machine.

Designating your 3D printer wastes

Exposing waste metal powders and condensates to air can cause an explosion, so they are often considered **ignitable (D001)** and **reactive (D003)** dangerous wastes. Some metal alloys may also be designated as dangerous waste because they contain toxic metals like **chromium (D007)**, **silver (D011)**, or other heavy metals. You can test the waste using the [toxic characteristic leaching procedure](#)¹ to determine the concentration levels of toxic metals in your waste.

Remember: You are responsible for promptly and accurately [designating](#)² your wastes.



On-site treatment

Some generators physically process metal powders and condensate on site by adding silicone oil and sand to stabilize the material. This can make the waste less dangerous and safer for transport. **This activity meets the definition of treatment, even if waste codes aren't removed.**

If you treat your waste on-site, take the following steps:

- **Notify Ecology** that you conduct treatment by generator on your Site Identification Form.
- **Maintain a treatment log** with the date and amount of waste treated.
- **Report the total amount of treated waste** on a Generation and Management Form on your Dangerous Waste Annual Report.
- **Meet all conditions for exemption** and independent requirements that apply to your generator category.
- **Comply with all federal land disposal restrictions** for dangerous waste shipped off-site to a treatment, storage, and disposal facility.

If you send the material off-site for reclamation, **or if you are interested** in sending material off-site for reclamation, [contact an Ecology Pollution Prevention Specialist](#)³ to discuss waste reduction opportunities.

Related links

[Treatment by generator regulations](#)⁴ (WAC 173-303-170(2)(b)(iv))

[Focus On: Treatment by Generator](#)⁵

New Federal e-Manifest Rule Creates Timeline Changes

JARED MATHEY

On Jan. 22, 2025, parts of EPA's e-Manifest Third Rule went into effect. This created different dangerous waste reporting timelines between the federal government and Washington State. These changes affect when to search for an unsubmitted manifest and when to file manifest exception or discrepancy reports.

To align with the national e-Manifest rules, we published the [Interim Compliance Assistance Policy for Manifest Exception and Discrepancy Reports](#).⁶

Ecology will use federal timeframes

The interim policy states that we will follow federal reporting timeframes in 40 CFR 262.42 and 264.72 instead of the timelines in Washington State rules. This policy is temporary until we complete rulemaking to adopt the federal e-Manifest regulations.

Who does this affect?

As of Jan. 22, 2025, these timelines apply to:

- Medium Quantity Generators or Small Quantity Generators in federal terms.
- Large Quantity Generators.
- Permitted Treatment, Storage, and Disposal (TSD) Facilities.

Manifest exception report deadlines

- **Start a search** for unsubmitted or unsigned manifests **after 45 days**.
- **Submit an exception report** if final signed copy of the manifest is not received **within 60 days**.

Discrepancy report deadlines for TSD facilities

Submit a report if discrepancies aren't resolved within 20 days.

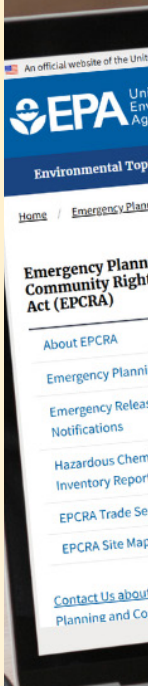
Full implementation by Dec. 1, 2025

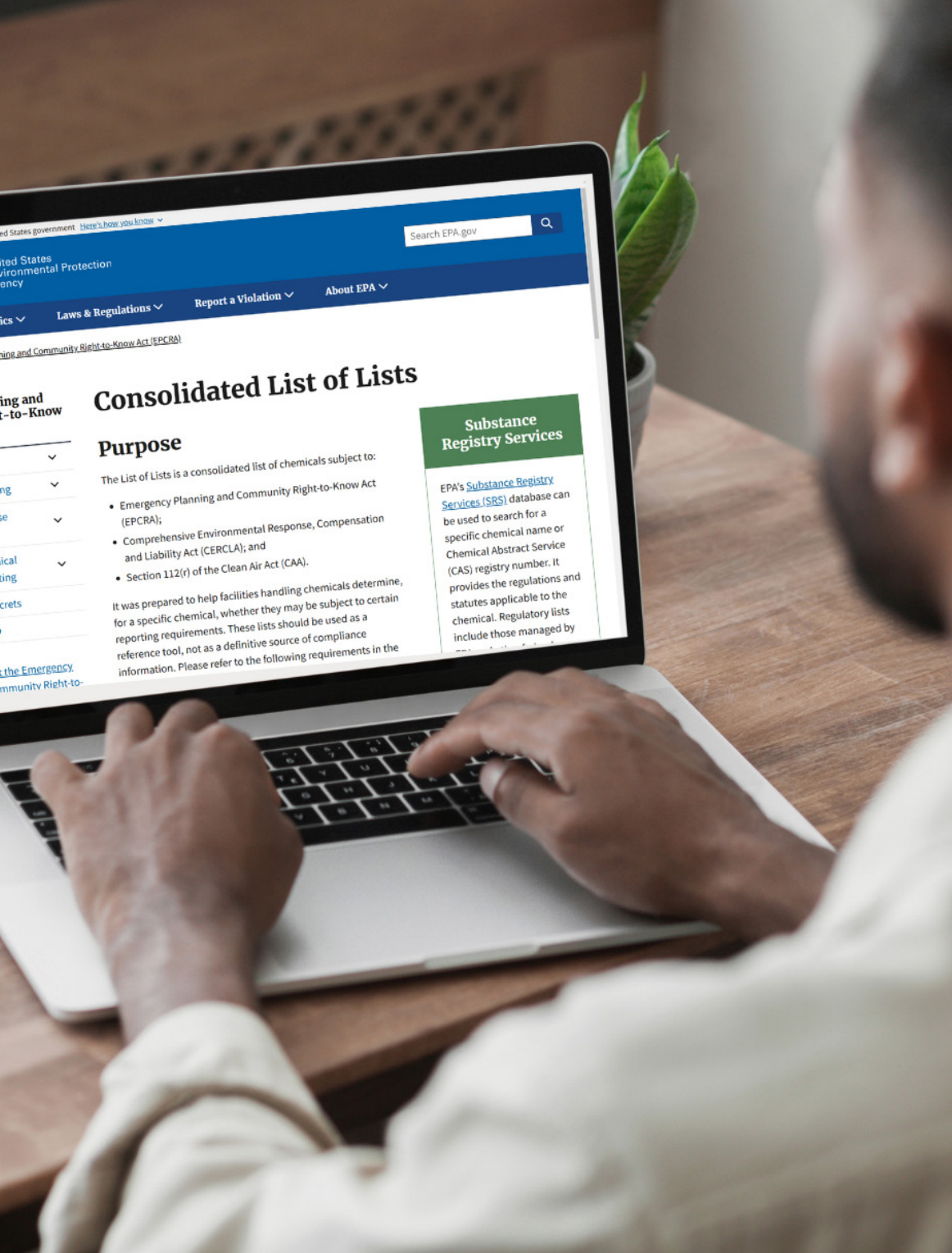
All parts of EPA's e-Manifest Third Rule will be in effect on **Dec. 1, 2025**.

- Facilities must submit electronic exception, discrepancy, and unmanifested waste reports through the e-Manifest module in RCRAInfo.
- Submitting paper or emailed reports to Ecology won't meet the federal requirements.

More updates coming

Look for another Shoptalk article later this year with more details and resources about the changes coming in December.





EPA Consolidated List of Lists—Error Notice

DIANE FOWLER

EPA's Consolidated List of Lists, originally published in October 2024, contained several errors. EPA published a corrected version in April 2025. Please make sure you're using the latest version.

Commonly referred to as the "List of Lists," this reference tool 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)
- Clean Water Act (CWA)

The Code of Federal Regulations (CFR) remains the official resource for the substances regulated under each program listed in the List of Lists.

🔗 [EPA's Consolidated List of Lists](#)⁷

TRI Reporting Reminder

DIANE FOWLER

TRI reports are due **July 1, 2025**, and must include newly added PFAS chemicals and the diisononyl phthalate (DINP) category. Track additional chemicals now for reports due in 2026.

If your business is in a TRI-covered industry, determine whether any of the newly added PFAS are present in the products you manufacture, import, process, or use. If you meet the 100-pound PFAS reporting threshold, reporting is required in 2025. This chemical inventory is part of your Emergency Planning and Community Right-to-Know Act (EPCRA) responsibilities.

Seven newly added PFAS for 2024

- 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)



Diisononyl phthalate (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)

Key reminders for PFAS reporting

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

- The **de minimis exemption no longer applies**—all concentrations of PFAS count toward the 100-pound threshold.
- **PFAS cannot be reported on Form A.**
- There are **limits on range reporting**.

Plan now for the 2026 reporting year

Nine additional PFAS were added 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)

Prepare now by tracking and collecting data on these nine PFAS during 2025. Reports for these chemicals are due **July 1, 2026**.

[!\[\]\(cf531ed27e91483460120fcc057b3901_img.jpg\) Learn more about TRI reporting requirements.](#)⁸

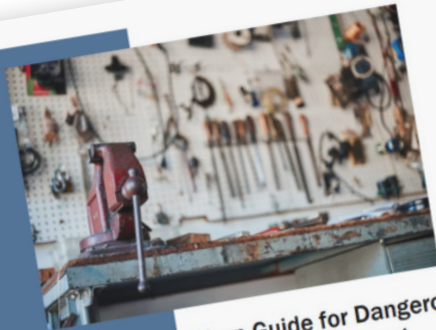
Helpful guidance for dangerous waste generators

Our most used resources!

RUTH FROESE

We've rounded up 10 of our most-used resources to help you manage dangerous waste more confidently and stay in compliance. These are the resources Ecology staff share the most when they're helping dangerous waste generators in Washington.

1. [Guide to Dangerous Waste by Generator Category](#)⁹
2. [Shop Guide to Dangerous Waste Management](#)¹⁰
3. [Dangerous Waste Designation](#)¹¹
4. [Focus on: Conditional Exclusions for Solvent-Contaminated Wipes](#)¹²
5. [Focus on: Satellite Accumulation Areas](#)¹³
6. [Quick Guide to Dangerous Waste Labeling](#)¹⁴
7. [Focus On: Episodic Generation](#)¹⁵
8. [Focus on Treatment by Generator](#)¹⁶
9. [Guide to Universal Waste](#)¹⁷
10. [Used Oil Guide: Generators, Collection Centers, and Aggregation Points](#)¹⁸



Shop Guide for Dangerous Waste Management



Revised March 2023, Publication 09-04-015



Quick Guide to Dangerous Waste Labeling



DANGEROUS WASTE			
Waste Accumulation Area	Labeling Must Say:	Start Date	Accumulation Time Limit
Satellite (limited volume) ¹	"Hazardous Waste" or "Dangerous Waste" and the hazards associated with the waste	No ²	No limit
Central Accumulation Area	"Hazardous Waste" or "Dangerous Waste" and the hazards associated with the waste	Yes	180 days AQGs 90 days LQGs
OTHER COMMON WASTES			
Waste Type	Labeling Must Say:	Start Date	Accumulation Time Limit
Special Waste	No labeling required (but encouraged to be labeled as "Special Waste")	No	180 days from the date waste exceeds 2,200 lbs
Solvent-contaminated wipes	"Excluded Solvent-Contaminated Wipes"	Yes ³	180 days
Episodic Waste	"Episodic Hazardous Waste" or "Episodic Dangerous Waste" with the hazards associated with the waste	Yes ⁴	60 days from episodic event start date
Pharmaceuticals ⁵	"Hazardous Waste Pharmaceuticals" or "Dangerous Waste Pharmaceuticals"	Yes ⁶	180 days
Used Oil	"Used oil"	No	One year
Spent Antifreeze	"Spent Antifreeze"	No	No limit
Universal Waste	<ul style="list-style-type: none"> "Universal Waste Lamps" or "Waste Lamps" or "Used Lamps" "Universal Waste Batteries" or "Waste Batteries" or "Used Batteries" "Universal Waste Mercury-containing Devices" or "Waste Mercury-containing Devices" or "Used Mercury-containing Devices" "Universal Waste Mercury Thermistats" or "Waste Mercury Thermistats" or "Used Mercury Thermistats" 	Yes	One year
Electronic Waste	No labeling required (but encouraged to be labeled as "Electronic Waste")	No	180 days
Cathode Ray Tubes	"Used Cathode Ray Tubes. Contains leaded glass. Do not mix with other glass materials."	No	Must recycle 75% of waste within one year of accumulation.

To download and print free labels, visit our website at <http://ecology.wa.gov/dangerouslabels>.

- For more information on waste labeling and management, please review the following Department of Ecology resources.
- Label Dangerous Waste: <https://ecology.wa.gov/labels>
- Focus on Labeling Dangerous Waste: <https://apps.ecology.wa.gov/publications/SummaryPages/1904013.html>
- Focus on Special Waste Exclusion: <https://apps.ecology.wa.gov/publications/SummaryPages/2104012.html>
- Dangerous Waste Pharmaceuticals Guide: <https://apps.ecology.wa.gov/publications/SummaryPages/2004049.html>
- Universal Waste Rule: <https://apps.ecology.wa.gov/publications/SummaryPages/2104017.html>

To request an ADA accommodation, contact Ecology by phone at 360-407-6700 or email at hwtprubs@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-811.

¹ Each satellite accumulation area is limited to 55 gallons of dangerous waste or 1 quart (2.1 lbs) of acutely hazardous waste or state only toxic extremely hazardous waste (W701).

² Waste from satellite areas will have a start date from when the satellite accumulation area reaches its volume accumulation limit or when moved to the central accumulation area, whichever comes first.

³ Start dates are not required if another way of demonstrating the date the waste was generated is available, such as an inventory of the items with the date they became waste.

⁴ The date the episodic event begins.

⁵ This requirement is for healthcare facilities managing noncreditable dangerous waste pharmaceuticals under WAC 173-303-555.

Hazardous Waste and Toxics Reduction Program



Guide to Dangerous Waste by Generator Category

About This Guide

This guide summarizes the most common requirements for each generator category under the [Dangerous Waste Regulations \(Chapter 173-303 WAC\)](#),¹ but is not an all-inclusive list. Always refer to the regulations for details or call a hazardous waste specialist at your [Ecology Regional Office](#).² Please refer to the [glossary of terms](#) (see page 9) for definitions of acronyms included.

To determine your [generator category](#),³ refer to section WAC 173-303-169 and the generator category definitions under WAC 173-303-040. The regulating agency for all generators is the Department of Ecology. Small quantity generators may also need to comply with local city and county regulations. If you are a health care facility as defined in WAC 173-303-555, please see our [Dangerous Waste Pharmaceuticals Guide](#)⁴ for additional information.

ADA Accessibility

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

Guide to Dangerous Waste by Generator Category

Table 1: Summary of large, medium, and small quantity generator regulations.

	Large Quantity Generator	Medium Quantity Generator	Small Quantity Generator
Waste Designation	Determine if waste is regulated dangerous waste.	Determine if waste is regulated dangerous waste.	Determine if waste is regulated dangerous waste.
Regulations	WAC 173-303-070	WAC 173-303-070	WAC 173-303-070

¹ app.leg.wa.gov/wac/default.aspx?cite=173-303

² ecology.wa.gov/contact.html

DANGEROUS WASTE DESIGNATION



Revised January 2023
Publication 23-04-006
DEPARTMENT OF ECOLOGY
State of Washington

New or updated publications

Cosmetics



[Toxic-Free Cosmetics Act Website Resources](#)¹⁹

[Let's Make Salon Products Safer for You and Your Clients](#)²⁰

[Chapter 173-339 WAC \(proposed\) Formaldehyde Releasers Technical Support](#)²¹

[Rulemaking Overview: Formaldehyde in Cosmetics Formal Draft Rule](#)²²

[Draft Cosmetics Implementation Plan: Chapter 173-339 WAC and Efforts to Reduce Toxic Chemicals in Cosmetic Products](#)²³

[Preliminary Regulatory Analyses for Chapter 173-339 WAC, Cosmetic Products Restrictions](#)²⁴



Safer Products

[November 14, 2024 Webinar Summary: Safer Products for Washington](#)²⁵

[Safer Products for Washington: Apparel and Gear Manufacturer Data](#)²⁶

Waste Management



[Used Oil Guide: Generators, Collection Centers, and Aggregation Points](#)²⁷

[Used Oil Guide: Transporters, Transfer Facilities, Processors, Re-refiners, Used Oil Burners, and Fuel Marketers](#)²⁸

[Focus on: Treatment by Solidification](#)²⁹

[Interim Compliance Assistance Policy for Manifest Exception and Discrepancy Reports](#)³⁰

[Draft Environmental Performance Partnership Agreement Between Ecology and EPA: State Fiscal Years 2026–2027](#)³¹

Endnotes

- 1 <https://www.epa.gov/hw-sw846/sw-846-test-method-1311-toxicity-characteristic-leaching-procedure>
- 2 <https://ecology.wa.gov/Designation>
- 3 <https://ecology.wa.gov/waste-toxics/business-waste/pollution-prevention-services/contact-us>
- 4 <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-170>
- 5 <https://apps.ecology.wa.gov/publications/summarypages/2004017.html>
- 6 <https://apps.ecology.wa.gov/publications/SummaryPages/2504023.html>
- 7 <https://www.epa.gov/epcra/consolidated-list-lists>
- 8 https://guideme.epa.gov/ords/guideme_ext/f?p=guideme:rfi-home
- 9 <https://apps.ecology.wa.gov/publications/SummaryPages/2004018.html>
- 10 <https://apps.ecology.wa.gov/publications/summarypages/0904015.html>
- 11 <https://apps.ecology.wa.gov/publications/SummaryPages/2304006.html>
- 12 <https://apps.ecology.wa.gov/publications/summarypages/1904016.html>
- 13 <https://apps.ecology.wa.gov/publications/SummaryPages/1904029.html>
- 14 <https://apps.ecology.wa.gov/publications/SummaryPages/1404045.html>
- 15 <https://apps.ecology.wa.gov/publications/SummaryPages/1904019.html>
- 16 <https://apps.ecology.wa.gov/publications/SummaryPages/2004017.html>

17 <https://apps.ecology.wa.gov/publications/SummaryPages/2104017.html>
18 <https://apps.ecology.wa.gov/publications/SummaryPages/2504005.html>
19 <https://apps.ecology.wa.gov/publications/SummaryPages/2504016.html>
20 <https://apps.ecology.wa.gov/publications/SummaryPages/2504015.html>
21 <https://apps.ecology.wa.gov/publications/SummaryPages/2504012.html>
22 <https://apps.ecology.wa.gov/publications/SummaryPages/2504011.html>
23 <https://apps.ecology.wa.gov/publications/SummaryPages/2504010.html>
24 <https://apps.ecology.wa.gov/publications/SummaryPages/2504009.html>
25 <https://apps.ecology.wa.gov/publications/SummaryPages/2504008.html>
26 <https://apps.ecology.wa.gov/publications/SummaryPages/2504013.html>
27 <https://apps.ecology.wa.gov/publications/SummaryPages/2504005.html>
28 <https://apps.ecology.wa.gov/publications/SummaryPages/2504006.html>
29 <https://apps.ecology.wa.gov/publications/SummaryPages/2504019.html>
30 <https://apps.ecology.wa.gov/publications/SummaryPages/2504023.html>
31 <https://apps.ecology.wa.gov/publications/SummaryPages/2504014.html>

