

Hazardous Waste **UPDATE**

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Hazardous Waste Update is the Thurston County Business Pollution Prevention Program newsletter for small quantity generators of hazardous waste, such as auto recyclers and auto shops, print shops, schools, painters, fire chiefs, dentists, pesticide applicators, and marinas.

To be taken off or added to this mailing list, call 360-754-4111 or e-mail donnetr@co.thurston.wa.us. We welcome your questions and suggestions!

The Business Pollution Prevention Program, run by Thurston County Public Health & Social Services, Environmental Health Division, works with businesses to reduce, safely store, and properly dispose of small quantities of hazardous waste. The county provides technical assistance, workshops, fact sheets, a disposal site, and Hazardous Waste Line at 360-786-5457. The TDD line is 360-754-2933.

How Small Quantity Generators are Regulated

Do you know what your status is?



The term "small quantity generator" refers to businesses that produce hazardous wastes in relatively small quantities (less than 220 pounds per month or 2.2 pounds of acutely hazardous wastes per year). Businesses that are classified as having small quantity generator status are regulated at the local level (Thurston County Public Health & Social Services, Environmental Health Division). Businesses that produce more than 220 pounds of hazardous waste per month are considered either medium or large quantity generators and are regulated at the state level (Washington State Department of Ecology) or federal level (U.S. Environmental Protection Agency).

Medium or large quantity generator status requires at least annual reporting of all hazardous wastes recycled or disposed. Thurston County Environmental Health requires small quantity generator businesses to provide secondary containment for all hazardous materials and keep receipts and manifests for all hazardous wastes that are



Report from the Field: Auto Recyclers Campaign

Auto recyclers play a vital role in the automobile industry, and provide an essential service to everyone in the community. Without the ability to safely manage auto waste we would be surrounded by rusting, dripping eyesores. For this we owe our local auto recyclers thanks. But, more often we hear about this industry with regard to environmental impacts. So, in 2002 the Thurston County Environmental Health Division conducted a voluntary technical assistance campaign for the auto recycling industry.



Seasonal flooding turned this auto recycling site into a temporary wetland.

All twelve active, licensed auto recyclers in Thurston County participated in the campaign. During site visits, hazardous waste specialists described Thurston County's Nonpoint Source Pollution Ordinance, presented some best management practices, and provided a regulatory contact for the industry. The county's Nonpoint Source Pollution Ordinance requires businesses to provide secondary containment for all hazardous liquids and to



recycled, reused, or disposed. There are no reporting requirements or fees associated with small quantity generator status in Thurston County.

There are some hazardous materials that are excluded from your generator status and reporting requirements IF



Storing full drums of hazardous waste outdoors without secondary containment is a violation of the county ordinance.

they are *recycled* and *not disposed* as hazardous waste. Examples of these wastes are used oil, antifreeze, lead acid batteries, and “universal wastes” (which include alkaline batteries and fluorescent light bulbs).

How Much Waste Do You Generate?

Small quantity generators are businesses that:

- produce less than 220 pounds (100 kilograms) of hazardous waste each month - that’s about 27 gallons, or half a 55-gallon drum;
- generate less than 2.2 pounds per month of certain pesticides and poisons that are defined as extremely hazardous waste;
- store less than 2,200 pounds (roughly five 55-gallon drums) on site at any one time;
- manage their waste properly.

Small quantity generators are thought to be small businesses, but there are many large businesses that have

obtained small quantity generator status by changing to less toxic products, reusing and recycling wastes, and just using less hazardous materials. Often businesses find that the disposal of certain hazardous wastes can exceed the cost of buying an effective non-hazardous chemical alternative. Maintaining small quantity generator status will also save your business money just by not having to report your hazardous waste shipments to the state.

If your business generates more than 220 pounds of hazardous waste per month, you must comply with the Washington State Dangerous Waste Regulations. Call the Department of Ecology at 360-407-6340, or check their website: http://www.ecy.wa.gov/programs/hwtr/reg_comp_guide/ for a guide to hazardous waste generator requirements in the state.

Is Your Waste Hazardous?

The Dangerous Waste Regulations use a process called “designation” to determine whether or not a waste is hazardous. Wastes are categorized based on their characteristics or if they meet certain criteria.

A waste is hazardous if it:

- 1) is ignitable, corrosive, reactive, toxic, or persistent; check the Material Safety Data Sheets (MSDS) for your products to learn if they have these characteristics;
- 2) is included on the dangerous waste lists, published in the Dangerous Waste Regulations.

Note that products not originally designated as hazardous may become contaminated during use. For more help determining whether your wastes are hazardous, see the Department of



Ecology website listed above or call the Thurston County Hazardous Waste Line.

Nonpoint Source Pollution Ordinance

Thurston County’s Nonpoint Source Pollution Ordinance, Article VI of the Sanitary Code, is designed to protect ground and surface water from hazardous waste contamination. The ordinance addresses secondary containment, disposal, and spill plans. It requires small quantity generators to:

- properly dispose of hazardous wastes, either by recycling or through a permitted hazardous waste management facility;
- provide secondary containment for on-site storage of hazardous materials and petroleum products; and
- have adequate plans and preparations in case of a spill.

More details on how to meet these requirements are in the fact sheet, *Compliance with the Nonpoint Source Pollution Ordinance* (see box below).



Questions?

Call the Thurston County Hazardous Waste Line at 360-786-5457. ♦

Further details on the county’s programs can be found in our fact sheets *Small Business Hazardous Waste Disposal Program, Storing and Labeling Hazardous Waste, and Compliance with the Nonpoint Source Pollution Ordinance*. These fact sheets are available by calling 360-786-5457 or visiting our website at <http://www.co.thurston.wa.us/health/ehrp/hwaste.html>.

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dispose or recycle hazardous materials in a legal manner (verified by disposal receipts and manifests).

Thurston County developed the campaign approach with the help of the Washington State Department of Ecology Hazardous Waste and Toxic Reduction Program. Together they identified seven hazardous wastes that must be removed during the processing of a vehicle. Thurston County developed a list of options available for each of these hazardous wastes, with the emphasis on reuse and recycling. The seven wastes are: gas, oil, antifreeze, batteries, freon, lead tire weights, and the residual liquid from crushing. Once removed from the vehicle these items become hazardous wastes and can be reused, recycled, or disposed of according to the Dangerous Waste Regulations.

Thirty-one best management practices (non-regulatory) were also presented to the auto recyclers to further minimize environmental impacts. These management practices covered the areas of: spill containment and cleanup, site maintenance, storage, solvent use, hazardous material management, and recyclable and solid wastes. At the time of the initial site visits, the recyclers were already conducting an average of 21 of these 31 best management practices.

Also at the time of the initial site visits, four of the facilities were operating in compliance with the County Nonpoint Source Pollution Ordinance. After an initial site visit and at least one follow-up visit, nine facilities achieved compliance and three notices of violation were issued. Thurston County Environmental Health continues to work with the remaining three businesses to help them gain compliance and set up a record-keeping system to help maintain compliance. ♦

Waste Management: Antifreeze

Washington State classifies antifreeze that contains more than 10% ethylene glycol as a dangerous waste, due to its toxicity. If your business produces waste antifreeze, you have two options: dispose of it as dangerous waste, or recycle it.

Recycling has many benefits. If you don't recycle, and instead choose to dispose of antifreeze, you must document how much your business generates each month and year and who disposes of it. If you dispose of over 220 pounds of dangerous waste in a month or greater than 2,200 pounds of accumulated waste at any one time, your facility is considered a "medium" or "large" quantity generator (see related article, "How Small Quantity Generators are Regulated"). Medium and large quantity generators of dangerous waste must comply with numerous requirements, including submitting an annual report to the Department of Ecology. However, if you choose to recycle your antifreeze, then there is no upper limit to the amount of antifreeze your facility can manage in a month or year, and you would not have to report it to the Department of Ecology.

Small quantity generators of dangerous wastes are regulated at the local level by Thurston County Public Health & Social Services, Environmental Health Division. In Thurston County all liquid dangerous wastes are required to be stored with secondary containment, and businesses must show proof of proper disposal or recycling. Thurston County encourages businesses to reuse or recycle antifreeze as much as possible and retain a manifest of how much, to whom, where, and when it was recycled. For a partial list of antifreeze recyclers, see page 4.



Antifreeze can be recycled at the hazardous waste collection site at the Thurston County Waste and Recovery Center.

Antifreeze Suggestions

- Do not mix antifreeze with other materials such as water, oil, or gas.
- Label waste antifreeze containers and keep them closed. Animals are attracted to the sweet odor – and it is highly toxic.
- Do not accumulate large volumes of antifreeze, since you will need to provide secondary containment for all of it.
- Recycle your antifreeze often.
- Maintain your disposal and/or recycling paperwork for five years (longer if possible).

For more information on how to recycle antifreeze, call the Thurston County Hazardous Waste Line at 360-786-5457. ♦

County Revising Hazardous Waste Disposal Prices

Thurston County Commissioners are considering updating prices for hazardous waste disposal at the county's hazardous waste collection site. Between 80 and 100 small businesses deliver waste solvents, oil, acids, paints, and batteries to the site every year. The ordinance that lists disposal costs requires updating to clarify eligibility and revise regulatory definitions. Rates were last reviewed in 1996.

Several new categories of wastes are proposed, including fluorescent light tubes and mercury batteries. Some prices are proposed for reduction and some for increases. Another proposed change is to no longer accept light ballasts with PCBs.

Disposal rates at the county collection site are based on the actual disposal costs charged to Thurston County by its hazardous waste disposal firm. The labor and transportation costs associated with sorting, packaging, and shipping wastes are not directly charged.

To be notified of the public hearing and receive a copy of the proposed changes, please call the Department of Water and Waste Management at 360-754-4348 or visit their website at <http://www.co.thurston.wa.us/wwm>. ♦

Quick Reference Numbers

Spills: Department of Ecology	360-407-6300
Air Pollution: ORCAA	360-586-1044
Sewer: LOTT Wastewater Alliance	360-753-8428
Thurston County Hazardous Waste Line	360-786-5457

Antifreeze Recyclers

The following is a partial list of antifreeze recyclers that service Thurston County.

Arcom

1-800-831-5243

Basin Oil

1-800-439-2948

Emerald Services

1-888-832-3008

Envirotech Systems Inc.

1-800-922-9395

Onyx Environmental Services

1-800-334-2387

Petroleum Reclaiming

1-253-383-4175

Philip Services

1-800-327-7759

Protective Environmental

1-206-624-5503

Safety Kleen

1-800-248-0311

Spencer Environmental

1-800-286-0896



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