

Properly Managing Hazardous Waste

Many businesses work with products or generate materials that are classified as hazardous or dangerous waste. While conducting air quality compliance visits, our inspectors are often asked “What should I do with this dangerous waste?”

All dangerous waste has requirements for storing, shipping, disposal and record keeping. Specific requirements vary depending on the type and volume of waste a facility generates and stores. Environmental regulations require storage of dangerous waste in closed containers to reduce evaporation.

The Washington State Department of Ecology (Ecology) regulates dangerous waste. All dangerous waste must be properly stored and disposed. Ecology has a program that assists businesses with the proper management, storage and disposal of dangerous wastes.

Here are some tips for dangerous wastes commonly generated at facilities that are inspected by Spokane Clean Air staff, such as surface coaters, gasoline stations and dry cleaners.

Solvents, Cleaners

Spent solvents are usually dangerous waste because they are ignitable, toxic or pick up hazardous contaminants (e.g. heavy metals) during use. They become dangerous wastes when removed from use.

Don't mix solvents with any other waste. Keep different types of solvents in separate, labeled, closed containers.

Shop towels, rags and absorbent pads containing solvents, paints, stains, inks or other chemicals that may be ignitable, toxic or contain certain chemicals that causes them to be dangerous waste. Used rags can spontaneously start fires, even when no flame is present and should be stored in closed, fireproof metal containers.

Dry cleaner solvents (i.e. perchloroethylene) and some spotting agents are considered dangerous waste when spent.

Coatings, Cans, Filters

Aerosol cans are not dangerous waste if they are completely empty. Partially full or full cans are usually a dangerous waste. Dangerous waste aerosol cans or drained contents must be managed under dangerous waste requirements.

Solvent-based paint waste must typically be managed as dangerous waste. This includes thinners, solvents and some paint booth filters if they have paint with certain heavy metals.

Lights

Some spent light bulbs may be dangerous waste because they contain mercury, lead, or other metals. These types of light bulbs may include fluorescent, neon, and High Intensity Discharge. If such light bulbs are recycled and handled properly, they may be managed as “Universal Waste” rather than dangerous waste.

✓ Light bulbs cannot be crushed. Store in structurally sound containers such as boxes, fiber drums.

- ✓ Accumulate no longer than one year from date they are generated.
- ✓ Clearly label or mark individual bulbs or containers as “Universal Waste – Lamps,” “Waste Lamps,” or “Used Lamps”.
- ✓ Immediately clean up broken bulbs and store debris in a closed container with a dangerous waste label and a “Toxic” risk label.

Batteries

Some batteries are dangerous waste, but can be managed more easily as “Universal Waste” when sent for recycling.

- ✓ You may accumulate batteries for one year from the date they are generated.
- ✓ Store damaged or leaking batteries in closed containers to prevent releasing toxic materials to the environment.
- ✓ Clearly label individual batteries or containers of batteries in the following manner: “Universal Waste-Batteries” or “Waste Batteries” or “Used Batteries.”

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Gasoline Station Maintenance Pays

Ongoing efforts will reduce emissions, operating costs

Gasoline station owners and operators who commit to regular maintenance practices often have fewer air quality compliance issues during routine inspections. Maintenance keeps equipment in optimal working condition which saves money and reduces contaminants from being released to the air.

Gasoline vapors, released during vehicle refueling and filling underground storage tanks (UST), contribute to ozone pollution. These vapors react with oxides of nitrogen, in the presence of sunlight, to form ground-level ozone. Ozone can cause lung damage and breathing difficulty, and can impact wildlife and reduce crop yields. In addition, gasoline contains numerous toxic compounds, including benzene, a probable cancer causing chemical.

Below are **basic requirements** that will be checked during air quality compliance inspections.

Stage I Vapor Recovery Systems:

Vapor recovery equipment must be maintained in good working condition at all times, including:

- ❑ The protective caps must be on tight and locked down unless actively unloading fuel into the UST. Sealing gaskets and poppet valves must be in good working condition.
- ❑ The adapter on the fill tube and vapor recovery tube does not turn (for non-swivel adapters only.)
- ❑ The fill tube gasket must be present and in good working condition.

- ❑ The upper cut of the bottom of the fill tube must be within 6 inches or less of the bottom of the UST.
- ❑ The spill bucket is dry and clean, as pictured on right.
- ❑ The UST vent must have pressure valve or similar cap to minimize gasoline vapor releases to the air.



This spill bucket or fill well gets good marks for being dry and clean. See side article on the next page for ways to remove liquid from a fill well.

Stage II Vapor Recovery Systems:

Vapor recovery equipment must be maintained in good working condition at all times, including:

- ❑ Hose must be in good repair. No wear, holes or leaks for correct fuel flow direction. Hose retractor and swivels are working properly.
- ❑ Breakaway must be in good repair for correct fuel flow direction.
- ❑ Nozzle, latch coil and hold-open latch – check nozzle spout for secure fit and uniformly round, vapor holes on nozzle are free of debris, and latch coils in good repair. Make sure hold-open latch is operating properly.
- ❑ Face plate must be smooth and uniform.
- ❑ Hose/liquid removal device – when in holster, the hose length should create a loop no longer than 10 inches. If over 10 inches, then a liquid removal device is required.

- ❑ Liquid removal device – check hose for liquid accumulation by lowering nozzle to small container on ground and compressing bellows to see if fuel drains from hose. If it does, the liquid removal device is damaged or not properly installed.
- ❑ Dispenser holster must not compress nozzle bellows when placed in holster.

Additional requirements for Vacuum-assist Stage II Systems:

- ❑ Vacuum pump - during refueling, listen for pump to ensure it is working.

All Gasoline Stations must:

- ❑ Keep maintenance and annual through-put records for the most current 24 consecutive months.
- ❑ Have all vapor recovery fittings attached and operating properly when receiving a fuel delivery from transport tanks.

Compliance assistance visits and materials are available, call 477-4727. ■

Removing Liquid in a Fill Well:

If the liquid is gasoline, pull the spill plug in the fill well to drain it back into the underground storage tank.

If the liquid is water, use absorbent pad-type material to mop up the liquid and dispose of as garbage, or scoop / pump out the water.

If the liquid is a mixture of gasoline and water, mop up the liquid with an absorbent pad and place used pads into a sealed bag. Or scoop/pump liquid into a container that can be sealed. Per Ecology, you must treat this as hazardous waste.

The Spokane Regional Solid Waste System's Valley Transfer Station, 3941 North Sullivan Road, offers hazardous waste disposal drop off for businesses that generate small amounts of hazardous waste (less than 220 pounds/month.) This monthly service is by appointment and contracted out to PSC, 922-6417.

There is an option of having the gasoline water mixture tested to confirm it's designation as hazardous waste or non-hazardous waste. If it is deemed not hazardous, then the waste may be treated as garbage.

For more information and assistance, contact Ecology's Hazardous Waste Office at their Eastern Region Office in Spokane, 329-3400. ■

Managing Hazardous Waste

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Waste Containers - Dangerous waste containers should be:

- ✓ Closed except when adding or removing waste. If you need to add waste frequently, consider using a funnel with latching lid.
- ✓ In good condition (no rust, bulging, leaks, etc.)
- ✓ Handled to prevent rupture or leaks.
- ✓ Properly labeled. Free, printable labels are available at www.ecy.wa.gov/programs/hwtr.
- ✓ Made of material compatible with the waste. For solvents, use metal drums, for acids or caustics, use polyethylene.

Storage

There should be specific areas in your shop for storing dangerous wastes and products considered hazardous, such as solvents.

- ✓ The area should be well marked with dangerous waste signs and be access-restricted.
- ✓ The storage area should have a floor made of impervious material, like concrete that is free of cracks with no drains.
- ✓ It must be indoors or under cover outside and protected from precipitation run-on and run-off.
- ✓ Containers should have clear dangerous waste and risk labels and a containment system to hold leaks and spills.

Small amounts of dangerous waste may be held near the work stations where they are generated. These satellite accumulation areas are places to store waste as you work, before moving it to the central storage area. Containers should have dangerous waste and risk labels.

Spills, Leaks, Drips - Material that spills, leaks or drips is waste unless it is reused.

- ✓ Clean up spills, drips and leaks immediately so they don't spread or evaporate.
- ✓ Determine whether clean-up waste is dangerous waste before disposing.
- ✓ For small spills, the use of absorbent granules (kitty litter), absorbent pads or other absorbent materials may create less dangerous waste than washing with water.
- ✓ Report significant spills and releases to: National Response Center, 800-424-8802 and WA Emergency Management Div., 800-258-5990.

Shipping

The transport of any dangerous waste or hazardous material must comply with the Department of Transportation Hazardous Materials Shipping requirements. Anyone can, many are required to, use a dangerous waste transporter registered with the US Environmental Protection Agency to ship their dangerous waste.

Disposal

Disposal options for dangerous waste are different than for solid waste. Anyone can and many are required to send dangerous waste (DW) to a facility with a DW treatment, storage or disposal permit. There are other options for the smallest category of dangerous waste generators.

For more information, contact Ecology's Eastern Regional Office in Spokane at 329-3400. Information for the article came from Ecology's Shop Guide for Dangerous Waste Management. ■

Surface Coating Workshop: *Fine-tuning skills reaps rewards*

Two surface coating workshops were held recently at Spokane Clean Air's office. The workshops focused on pollution prevention and compliance with new federal surface coating regulations.

Ken Grimm, from Pacific Northwest Pollution Prevention Resource Council (PPRC) conducted the workshops with involvement from Spokane Clean Air.

Grimm, a former surface coater, demonstrated techniques for shops

to fine-tune their painters' application skills for better efficiency, safety and savings.

Attendees received materials and training needed to meet the Environmental Protection Agency (EPA) certification requirements.

Federal requirements for surface coaters are online at www.ccar-greenlink.org/painrule.html.

The workshops were made possible by an EPA technical assistance pollution reduction grant.



Ken Grimm of PPRC demonstrates a laser training tool used to develop muscle memory of proper distances for various surface coating applications

If you would like a refresher on the local requirements for your surface coating operation or a copy of our surface coating guidebook, call 477-4727.

Regulation Update - Indirect Source Rule

Proposed Indirect Source Rule -

Following a series of workshops and an informal comment period, Spokane Clean Air has begun formal rule making for a proposed Indirect Source Rule, SRCAA Regulation I, Article VI, Section 6.18. A public comment period is underway through July 21, 2011.

What are indirect sources? Indirect sources are defined as any facility, building, structure, or installation, or combination thereof, which generates or attracts mobile sources that results in emissions of any air contaminant or toxic air contaminant. The definition of indirect source does not include construction sites that generate mobile source emissions for less than one year or facilities that are solely comprised of public roadways (e.g., freeways are not considered indirect sources under this rule). Indirect sources could potentially include warehouses, industrial parks, rail yards, transportation centers, airports, truck stops, etc.

Who will the new rule affect? The new rule will regulate indirect sources in Spokane County with PM_{2.5} emissions above 0.5 tons/year and/or NO_x emissions above 25 tons/year that cause or contribute to: a violation of one or more federal, state, and/or local ambient air quality standards; or an adverse human health effect.

Why is SRCAA proposing this rule? EPA recently adopted a one hour NO₂ ambient standard and has proposed a more stringent ozone ambient standard. In addition, diesel particulate matter has been identified by Washington and other states as a toxic air pollutant and is a component of PM_{2.5}. Indirect sources can be a significant source of NO_x, diesel particulate matter and PM_{2.5} emissions. The indirect source rule will establish requirements for affected indirect sources which may lower ambient levels of NO_x, particulate matter, and PM_{2.5}.

What does the rule require? The rule requires affected indirect sour-

ces to submit an Emission Reduction Plan (ERP) to SRCAA for approval which outlines measures to be taken to reduce emissions to the greatest degree practicable in the shortest time practicable. Once the ERP is approved by SRCAA, the indirect source must implement the ERP.

Where can I get a copy of the proposed regulation and fact sheet? These documents are available at www.spokanecleanair.org, under "Notices & Hearings" on the home page, or call 477-4727 to request a copy.

Public comments requested - Written comments on the proposed rule may be submitted to SRCAA, Attn: April Westby, 3104 E. Augusta Avenue, Spokane, WA 99207, or awestby@spokanecleanair.org

Next steps - A public hearing on the proposal will be held August 4, at 9:30 a.m., Spokane Clean Air office, 3104 E. Augusta Ave. For updates, visit www.spokanecleanair.org, under "Hearings & Notices" on the home page. ■



Business Spotlight

Local Businesses Recognized



Doing Our
Share
for Clean
Air

Business
Recognition
2011/2012

Gold Recipients:

Altek Inc.
American Way Collision Center
Central Pre-Mix (3 sites)
Dishman Dodge
Hydrostraw LLC
Inland Asphalt Co.
Inland Empire Distribution Systems, Inc.
JJ's Auto Collision
K&M Unibody Works Inc.
Liquid Transformations
Maaco Auto Painting & Body Works
Nelson's Autobody
Pearson Packaging Systems
Riverside School District
Ross Printing Company
Shriners Hospital
Spokane Teachers CU
Spokane Transit Authority
The Woodman
Washington Auto Collision

Silver Recipients:

A Super Store
A-1 Gas & Grocery
Adi's Food Mart (2)
ADM Milling Co.
ADM Mix Plant
All Pets Memorial
Alliance Machine Systems
American Way Auto Body
American West Chrome
Appleway Collision
A-Pro Auto Body & Towing
Banner F & F Kardlocks (3)
Barton Collision
Boeing Employees CU
Blue Falls USA

BMT Metal Fabrication
Burlingame Steel, Inc.
Can-Am Body Shop
Cenex Zip Trip (24)
Central Pre-Mix (2)
Cheney Conoco
Chevron Food Mart
Ciena Corp.
City of Cheney-Wastewater
City of Spokane-Fleet Svcs.
City South Auto Body
Comcast
Consolidated Container
Contemporary Fiberglass
Cooperative Supply Inc. (3)
Coyote Creek Cabinets
Craig's Automotive Collision Center
Cravens Coffee Co.
Crestline Cleaners
Cylinder Head Service Inc.
D&D Body Shop
Dave's Auto Body & Glass
Deer Park Cleaners
Deer Park Food Mart
Doors & Millwork Inc.
Driscoll One Stop
Eastside Electric
Ed's Premiere Auto Body
Evergreen Gas & Grocery
Family Pet Memorial
Farm Power
Foothills Body Shop
Four Lakes Grocery
Four Seasons Coffee
Garco Building Systems
GCR Tire Center
Glamour Collision
Gobees Auto Body
Goodrich Corporation
Grand Boulevard Conoco
Grocery Boys
Group Health Cooperative
Haakon Industries
Harper Conoco
Haskins Steel Co. Inc.
H&B Superior Metals Inc.
Hydrostraw LLC
Inland Asphalt - Sullivan Rd.
Interstate Concrete & Asphalt - Elk Facility
Jensen Auto Body
Jinda & Brothers Inc.
Johanna Beverage Company
Kimmel Athletic Supply
L & M Truck Sales Inc.
Lafarge North America
Levi's Minit Mart
Liberty Lake Chevron
Miller's One Stop
Minor Body & Fender
Mission Food Mart
Moon Rock Company
Motor Works Inc.
Northwest Pea & Bean Co.
Northtown Mall
Novation
Petrocard, Inc. (2)
Premera Blue Cross
Pyrotek
Quality Millwork
Rich's Gas & Deli
Riplinger Funeral Home
Roast House Coffee
Roi's Furniture Repair
S & B Mart
SCRAPS
Scollards Cleaners
Shredfast Inc.
Sign Corp

Snow Peak Forest Products
Speedi Shoppe
Spokane Arena
Spokane Galvanizing, Inc.
Spokane Metals LLC
Spokane More Mile (Les Schwab)
Stadium Sports
Sterling International
Stock Building Supply
Super Store
T-2 Services Inc.
The Gas Company
Thompson's Gas & Deli
Tom Sawyer Country Coffee
Tonys Collision & Automotive Repair
Towner & Towner
Tripleplate Chrome
United Lithographers
U.S. Bank Building
Valley Auto Painting
Washington Auto Carriage
Washington State University
Wear-Tek
West Plains Conoco
Western Systems
White Block Co. Inc.
Whitley Oil #1
Zin Food Mart

For details on the recognition program & criteria, visit spokanecleanair.org

UPDATE

Spokane Regional Clean Air Agency
3104 E. Augusta Avenue
Spokane, WA 99207

Pre-sort STD
U.S. Postage
PAID
Spokane, WA
Permit No. 28

Air • Quality • Calendar

Jul 7 Board of Directors meeting, 9:30 a.m., Spokane Clean Air conference room, 3104 E. Augusta Avenue. The meeting agenda is available at www.spokanecleanair.org or call 477-4727.

Aug 4 Board of Directors meeting (details above).

Sep 1 Board of Directors meeting (details above).

Spokane Regional Clean Air Agency Board of Directors:

Tom Brattebo, Chair, Member-at-Large

Jeff Corkill, City of Spokane Representative

Edward "Chuck" Crockett, Small Cities & Towns Representative

Rose Dempsey, City of Spokane Valley representative

Al French, Spokane County Commissioner

UPDATE is published by the Spokane Regional Clean Air Agency as part of its Compliance Assistance Program. Send article ideas and comments to Lisa Woodard, Editor, lwoodard@spokanecleanair.org.



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To view or download this newsletter online, visit <http://www.spokanecleanair.org>, then select "Publications" on the left menu bar.

Toxic Release Inventory Program

In 1984, a deadly cloud of methyl isocyanate killed thousands of people in Bhopal, India. Shortly thereafter, there was a serious chemical release at a sister plant in West Virginia. These incidents underscored demands by industrial workers and communities in several states for information on hazardous materials.

Public interest and environmental organizations around the country accelerated demands for information on toxic chemicals being released "beyond the fence line" -- outside of the facility. Against this background, the Emergency Planning and Community Right-to-Know Act (EPCRA) was enacted in 1986.

One of EPCRA's primary purposes is to inform citizens of toxic chemical releases in their areas. EPCRA Section 313 requires EPA and the States to

collect data annually on releases and transfers of certain toxic chemicals from industrial facilities and make the data available to the public through the Toxics Release Inventory (TRI).

In 1990 Congress passed the Pollution Prevention Act which requires facilities to report additional data on waste management and source reduction activities to EPA under TRI.

The goal of the TRI Program is to provide communities with information about toxic chemical releases and waste management activities and to support informed decision making at all levels by industry, government, non-governmental organizations, and the public.

The TRI Program compiles the TRI data submitted by regulated facilities each year and makes the data available through the Data Files and Analyses

and Analytical Tools web pages.

EPA added 16 new chemicals to the TRI list of reportable chemicals. Reports for these new chemicals are first due July 1, 2012. This means that TRI facilities must be tracking their use and any environmental releases of these new chemicals now.

A partial list of facility types expected to be impacted by this rule change include wood product and paper manufacturing, petroleum and coal products manufacturing, petroleum bulk stations and terminals, hazardous waste collection, treatment and disposal facilities.

To determine if your facility is affected, review the applicability criteria in part 372 subpart B of Title 40 of the Code of Federal regulations (linked from the web address below).

Source: www.epa.gov/tri/ ■