

Compliance with the Dangerous Waste (DW) Regulations

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Do you have a 29th grade
education?

The DW Regulations

- Incorporates federal RCRA (Resource Conservation and Recovery Act)
 - prevents contamination, mix of performance based and limit based regulations
- DW Regulations more stringent
- 218 pages – guaranteed to thoroughly confuse you and great for putting you to sleep at night!

Acronym Haven

- RCRA

- TBG

- PBR

- DW

- POTW

- WWTU

- BMPs

Lets talk “Clean Dry Floors” Today

- Which regulations govern the waste waters generated from my process floors/sumps?
- What do I need to do to reduce my long term liability and stay in compliance?
- This stuff is complicated – Who can I talk to?

What to do with your process floor/sump wastes?

- Reduce or Eliminate – 1st Choice
- Ship it out - EXPENSIVE!
- Treat it on site - Feasible

3 Ways to treat your own wastes

- Get a “TSD Permit”
- Utilize “Treatment By Generator” (TBG)
- Utilize “Permit” By Rule (PBR)

Get a “TSD Permit”

- Do you have:
 - 5 years to wait?
 - Lots of money to get the permit?
 - Lots of money to implement/maintain the standards in the permit?
- If not, lets look at TBG and PBR

Treatment By Generator (TBG)

- Treatment done in Tank or Container
- Treat within 90 days of generation (LQG)
- Not for waste waters discharged to POTW
(see PBR)

Treatment By Generator (TBG)

- Must count all wastes treated and residues
- Most commonly seen – Evaporation
- See section WAC 173-303-170 and Technical Information Memo #86-1

“Permit” By Rule (PBR)

- For treating Dangerous Waste Waters
- Splits regulatory responsibility between dangerous waste and water quality laws
- Mix of limit based regulations (CWA) and performance based (DW regs - section – 283)

“Permit” By Rule (PBR)

To utilize PBR, you must:

- Have a NPDES, state waste discharge or pretreatment permit, and
- Have waste water (any waste authorized by permit above to be discharged through WWTU), and

“Permit” By Rule (PBR)

- Follow other requirements in WAC 173-303-802(5):
 - 060 (notify), 070 (designate), 283 (performance standards), 300 (waste analysis plan), 310 (security), 350 (contingency plan), 360 (emergencies), 370 (manifests), 380(1)(d) (operating record - incidents), 390 (reporting)

PBR and Counting Advantage

- Don't count waste waters directly piped into WWTU (immediately managed)
 - Saves you money in fees and may reduce generator status
- Do count waste waters accumulated prior to going to WWTU and sludges

PBR & Your Floors/Sumps

- Clean dry floors is a standard that would help prevent degradation of ground water quality. There is no specific regulation in the DW regs for “clean dry floors”.
- Both sets of regulations could enforce more stringent standards on floors/sumps if problems arise.

What type of problems?

- Spalling
- Release outside containment
- Liner/floor cracked
- Lots of waste on floor for extended time
- No inspections or checks
- Groundwater or soil contaminated
- Others

What would an inspector do?

- Order you to comply with sections of the tank regulations (through section -283).
- WQ/Permit writer could also order you to comply with more stringent standards on your floor and sump areas through their permit.

Feeling Dually Regulated?

- Yes! The reality is...You Are!
- Don't shoot the messenger
- We are working on it –
 - Ecology HWTR and WQ programs are teaming to address which regulations will take responsibility for working proactively towards preventing releases to the environment.

Until then....

- Inspect your process floors and sumps
- Reduce/eliminate wastes to your floors
 - Hang parts differently
 - Use drain boards
 - More freeboard
 - Use splash guards
 - Check out toolkit

More you can do

- Eliminate waste waters and sludge from sitting on the floor for extended periods
 - Line your sump
 - Slope floors to drain to sump
 - Install an automatic pump
- Coat your floors with chemical resistant coating

Even more you can do

- Install leak detection systems
- Train and retrain employees on equipment or procedure (provide incentives!)
- Again, inspect floors/sumps often – the sooner you find a problem the cheaper it will be to remedy.

The Bottom Line

- Reduce or Eliminate wastes to your floors
- Check out the info in the toolkit
- Call a Toxics Reduction Engineer or HW Inspector for help
- Inspect your floors/sumps and record status
- Install equipment to protect wastes from migrating through your floors

Got Questions?

- Call me
 - Michelle Underwood
 - 360.407.6897
- Call your regional HW Compliance Inspector – they do TA too!
- Call any Toxics Reduction Staff

Call List

- Northwest Regional Office:
 - Dave Misko, Compliance Supervisor
 - 425.649.7014
 - Dennis Johnson, Toxics Reduction Supervisor
 - 425.649.7040
- Southwest Regional Office:
 - Alex Stone, Compliance Supervisor
 - 360.407.6344
 - Hugh O'Neil, Toxics Reduction Supervisor
 - 360.407.6354

Call List Continued

- Central Regional Office
 - Brain Dick, HW and Toxics Section Supervisor
 - 509.454.7659
- Eastern Regional Office
 - Jim Malm, HW and Toxics Section Supervisor
 - 509.456.2725