

# Retail & Distribution Center Technical Assistance Campaign 2015 – 2016

Thurston County  
Environmental Health Division  
Solid & Hazardous Waste Section  
(360) 867-2664  
[www.co.thurston.wa.us/health/ehhw/](http://www.co.thurston.wa.us/health/ehhw/)



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## ABSTRACT

After large fines were issued by the US Environmental Protection Agency and local California governments to retail stores and distribution centers regarding hazardous waste handling and disposal, we developed a technical assistance program to assist local stores and distribution centers understand the federal, state, and local regulations for hazardous material management. Eighty-one businesses were identified in Thurston County that could benefit from technical assistance. Seventy-three of these facilities were sent regulatory information and invited to participate in a voluntary site visit (the remaining eight stores were excluded because the Washington State Department of Ecology had either visited them recently or were planning to visit them in the near future). Of these, 53 retail stores and 4 distribution centers participated. Site visits revealed that stores selling hazardous products likely produce hazardous waste, and several produce more hazardous waste than necessary. Findings showed that 14 of the 57 participating stores had improper or no protocols for managing hazardous waste and 45 of the 57 stores could improve their system by incorporating at least one additional Best Management Practice.

## PROJECT BACKGROUND

Thurston County's Business Pollution Prevention Program is designed to allow for one-on-one technical assistance visits to ensure proper handling, storage, and disposal of hazardous wastes and materials at businesses. The program confirms or helps stores obtain compliance with the Thurston County Nonpoint Source Pollution Ordinance (Article VI of the Thurston County Sanitary Code), local sewer regulations, and state and federal hazardous waste management requirements. Businesses are also encouraged to implement Best Management Practices (BMPs) that address other agency's regulations, recycling opportunities, waste reduction, and other safety concerns. With the goal of protecting public health and the environment, technical assistance visits can be initiated by a request from the business, a complaint, a referral from another agency, a spill, or as part of a campaign. Campaigns target businesses based on geographic areas, waste stream type, or industry type. These campaigns are designed to avoid inequitable or arbitrary enforcement among different competitors in the same field and to work constructively as possible with these businesses to ensure compliance.

Recent US Environmental Protection Agency and local California government fines focusing on retail stores and distribution centers first brought Thurston County's attention to the retail industry. These fines included: Dollar Tree in 2015 (\$2.7 million), Safeway in 2015 (\$9.9 million), Wal-Mart in 2013 (\$81.6 million), CVS Pharmacy in 2013 (\$13.7 million), and Costco Warehouse in 2012 (\$3.6 million). These enforcement actions showed that retail stores can produce a large amount of hazardous waste, have a great potential to mismanage their waste, and do not have a good understanding of the regulations that apply to them.

As the majority of these stores had never been visited by us (Thurston County Public Health & Social Services Department) or Washington State Department of Ecology (Ecology), we researched and designed a Technical Assistance Campaign focused around these retail stores and distribution centers. The goal of this campaign was for Thurston County staff to understand the rules that apply (both local, state, and federal hazardous waste regulations) and provide clear and simple information to store staff about how to comply with these regulations. Without the fear of enforcement action, stores could be provided with specific information, have their current storage and disposal system evaluated, and ask for advice or clarification.

## PROCESS

**Store Identification:** Eighty-one stores were identified through a combination of yellow page review, web searches, and local knowledge. These included home improvement stores, grocery stores, outdoor and sports stores, chain drug stores, hobby stores, garden/farm stores, electronic retailers, large box stores, and any related distribution centers. The number and type of stores visited was much larger than the initial "box stores" identified, to try to capture the wide range of retail stores that would benefit from a technical assistance program. Different types of programs within these stores produce different waste streams. These include: general maintenance and cleaning of the store, machine repair work, fleet maintenance, pharmacies, photo processing, garden centers, and the selling of merchandise that contains hazardous materials.

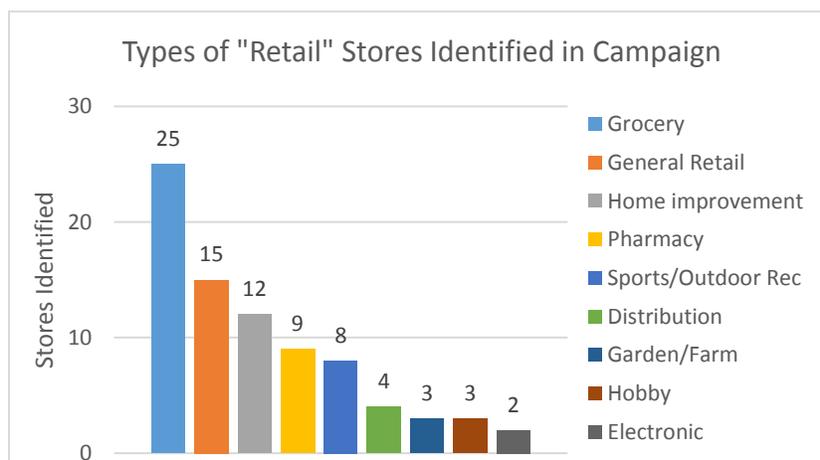


Figure 1: Shows the variety of "retail" stores identified for this campaign.

**Campaign preparation:** Significant time was spent understanding the diverse waste stream, laws, and producing handouts prior to conducting campaign site visits. This included meeting with Ecology to discuss our campaign, creating educational materials (which were reviewed by both Ecology and a Thurston County Outreach Specialist), collecting relevant state handouts for reference materials, and shadowing Ecology on site visits to a large retail store and a hospital that had a compounding pharmacy. Reference materials were brought with us on site and certain questions were forwarded to Ecology for review prior to responding. The program was designed so that we could leave written hardcopies of all materials at the store at the conclusion of the site visit. These hardcopies allowed the individuals to follow up with their supervisors with documentation of any changes they needed to make. Materials brought with us during a site visit included (See Appendix I):

- “Commercial Parcel Inventory” basic store layout information gathered for our file, carbon copy left with store
- “Best Management Practices Check List” includes all our recommendations for stores, copy left with store
- “Notice of Compliance” and “Notice of Non-Compliance,” carbon copy left with store
- “Survey” left in a pre-stamped envelope
- “Compliance with the Nonpoint Source Pollution Ordinance” describes Thurston County’s code requirements relating to hazardous waste storage and disposal
- “Hazardous Waste Storage Guide” shows the layout of a typical storage area, describes overall requirements, and lists common hazardous products and their hazard class
- “Basic Spill Plan” shows an example spill plan and other related information
- “Vendor List” lists local vendors that will provide services relating to hazardous waste management and disposal
- Binder with miscellaneous handouts both from Thurston County and Ecology
- Clip board, business cards, and camera
- Example spill kit and personal protective equipment was available in the car, for reference if needed

**Cooperation with the Department of Ecology:** All handouts were reviewed by Ecology (Leslie Morris – Hazardous Waste & Toxics Reduction and Molly Sullivan in Pollution Prevention). Certain questions from store staff that we were unable to answer during a site visit were discussed with Ecology before responding. Because Ecology regulates medium and large quantity generators (MQG and LQG) of hazardous waste, all contact with the 15 local MQG and LQG businesses was coordinated with them. Eight of these MQG and LQG businesses (part of the initial 81 stores identified) were not contacted, as Ecology had either visited recently or was planning to visit soon with their own campaign.

**Contacting Stores:** It was difficult and time consuming to obtain access to corporately operated stores with out-of-state headquarters. By the end of the campaign, a combination of communication methods seemed to be the most successful. First, an introductory letter (see example in Appendix I) was mailed to both the store’s physical address and the store’s corporate address (identified through tax information or through their online websites). This letter included a statement that if no contact was made within 30 days of receiving the letter, a drop in site visit would be conducted. Twenty-six of 81 stores responded to these letters and we were able to set up site inspections (two did not have hazardous waste, and therefore no visits were scheduled with them). We also attempted to call the stores directly, but with corporate based companies a lot of time and effort was put in for very little success. If anyone said no, an attempt to contact a different individual was made (for example, a store manager said no, but corporate later said yes). After well over a month of no contact, we then conducted drop in site visits. Stores that did not want to participate were left a packet of information and another letter (see example in Appendix I) describing our campaign and inviting them to contact us.

**Site Visits:** If we were not familiar with the store’s product line, we would first walk around the store to identify products that were hazardous. We then either met with the individuals expecting us or approached customer service and asked for the store manager. In most cases, store or receiving managers would interact with us during drop-in visits and corporate representatives would take lead in scheduled visits.

We then would introduce the reason why we were there, our goal of assisting stores in getting to where they need to be, re-iterating that it is an assistance not a compliance visit, and going over the county’s regulations versus the BMPs. We then usually walked into the back to where they manage their waste for an assessment. If they had collected any

hazardous waste we would review what they had collected, but did not inspect solid waste or recycling containers. We would also visit any satellite accumulation areas (such as the pharmacy, maintenance areas, or garden center) and review their practices there. At the conclusion of the site visit, we would leave copies of all our materials with the store. We also followed up with Ecology and the store to resolve any specific questions that we could not answer on site. Site visits were conducted at 57 stores.

## FINDINGS

**Generation:** Hazardous wastes in retail stores can be produced when products pass their expiration dates (such as medications), are returned and cannot be resold, are broken by a customer or during the receiving and/or shipping process, or when they are pulled from the shelf (off season, recall, etc.).

It is safe to conclude that the majority of retail stores that sell hazardous materials have and do generate hazardous waste. Depending on their stock, return policy, and discount/donation programs the amount of hazardous waste they handle could be as little as one quart of liquid ever five years to over 220lbs of waste in a month (MQG or LQG). Only six of all the stores initially identified were determined to have too little hazardous materials to warrant a technical assistance inspection. Stores that struggle with generating too much waste or have trouble managing the amount of waste they do generate should spend some time looking into donation programs, not allowing returns of hazardous items that cannot be re-sold, or giving/selling usable items to employees, as these practices appear to significantly reduce the amount of waste produced.

Most stores were clearly small quantity generators (SQGs) of hazardous waste. The one area most likely to tip a retail store into a higher waste generator status is exceeding the 2.2 pounds of P-listed pharmaceutical wastes or managing non-hazardous wastes as hazardous (ex: empty aerosol containers). Most pharmacies depend heavily on a reverse distributor and good inventory control to tell them when to send P-listed materials back prior to the expiration date. No stores were handling pharmaceuticals under the Interim Enforcement Policy for Pharmaceutical Waste or the Conditional Exclusion for State-Only Pharmaceutical Wastes.

**Waste Designation:** Stores that did have a formal process to designate their waste trained their employees in a variety of ways to recognize it. First, a lot of stores used lists or photographs of common types of items to help employees designate the waste. This methodology has the potential to both over or under designate as it groups chemicals together and requires employees to understand the chemical similarities of different products (flammable, acids, bases, etc.). Secondly, some of the larger stores set up an electronic system that tells employees how to dispose of a specific product when it becomes a waste using the product's barcode. Though likely costly and time consuming to create, this system has the benefit of being really easy to use by all employees and can designate the waste characteristics of each item individually. Some systems were designed by vendors, while other systems were designed by an internal corporate program. Overall, corporate designed systems tended to represent what wastes would actually be found in the stores better than generic vendor designed systems.

A lot of the larger chain stores' waste management systems were created in response to California fines directed at their or a similar business. Because of this, most stores followed California regulations in terms of how to designate their toxic waste. Though Washington and California both have additional regulations for toxic wastes, they are not identical. A comparison of the two regulations in terms of designating waste would be beneficial to both the understanding by inspectors and the understanding by businesses that are using California's regulations. The common assumption is that the California regulations are more stringent than any other state (which may not be true). In addition, it appeared that some stores were using only the federal EPA waste designation requirements, and were not aware that states (and local governments) can have additional requirements. These stores mostly were operated by offices based outside of Washington State and had no stores within California. One store was confused about the difference between the Washington State Labor & Industry's (L&I) Hazardous Pharmaceutical List vs. hazardous pharmaceutical waste. The L&I hazardous pharmaceutical list is based on precautions needed for handling specific chemicals to protect pharmacy employees and has nothing to do with waste designation.

Over designation of hazardous wastes was observed at a lot of stores. It appears that in most of these cases the business would assume wrongly that the disposal vendor was double checking everything and would let them know if they had done something wrong. We also provided a lot of clarification on the regulation of managing empty containers. Several businesses were managing empty aerosol cans and cleaning containers as hazardous and many did not know how to handle non-hazardous liquids (such as latex paint, some shampoos, etc.).

**Secondary Containment:** In almost all cases, the room the hazardous products or waste was stored in provided adequate secondary containment to prevent a spill from reaching the environment (satisfying Article VI of the Thurston County Sanitary Code). Rarely were any drains observed (outside of bathrooms, janitor closets, or kitchens) and waste was never stored directly by an exit. Most janitorial drains were located in an elevated floor sink or located away from product or waste storage. In a few places we had to review building plans to help businesses confirm that their floor drains were connected to a sewer system. One business was required to install secondary containment under a 55-gallon used oil container stored by a garage door.

In addition, most stores placed all hazardous liquid waste items into separate sealable plastic bags. This was done to reduce the likelihood of spills, cleanups, and non-compatible wastes mixing. In addition, most stores also then placed these bagged items into plastic totes based on their hazard class (usually: caustic-acidic, caustic-basic, oxidizers, flammables, toxics, and universal wastes). These totes were usually pre-labeled and referred to as the "bucket" system (see Figure 2). The toxic tote appeared to fill up the fastest, while the other totes were mostly empty. Sorting wastes, even with good labels or electronic systems was not always accurate.



Figure 2: Shows a typical "bucket" hazardous waste storage system found in retail stores.

**Disposal:** Overall, a variety of disposal systems were seen at the stores visited (see Figure 3):

1. **No system in place:** These stores had never heard of the federal, state, or local requirements and our conversation had to start at the very beginning. This meant that any hazardous waste produced was likely going out as solid waste or being disposed of down drains. Information was provided to inform these businesses about what changes were required.
2. **Corporate mail back / ship back program.** These stores usually accumulated all waste products (hazardous and non-hazardous), returns, and sometimes even garbage in one area and sent it back to their corporate distribution center regularly to sort through for final disposal. These stores do not designate, properly store, separate, or monitor how much hazardous waste they produce. In addition, they did not follow the any DOT shipping guidelines for labeling or manifesting hazardous waste. Furthermore, no one at these stores was clear about what happens once the material gets to the corporate office (which may be out of state) or what rules are being followed. Information was provided about what changes were required.
3. **Pick-up vendor and reverse distribution:** These stores used vendors or reverse distribution companies to come and pick up, transport, and arrange disposal or recycling of the hazardous waste or products. Some vendors also provided services that helped stores designate and store wastes. Clarification was needed at many stores about using reverse distribution for credit, for recycling, or for waste disposal. Information was provided about what changes were required if waste items were being disposed of through reverse distribution.

4. **Self-management using HazoHouse:** This appeared to be the cheapest and easiest option for most stores that rarely generated hazardous waste. This system does require at least one store employee to have a good understanding of the regulations and designation process.



**Figure 3: Shows the overall disposal system in place at inspected stores at the time of our Technical Assistance visit.**

**Communication:** The coordination between vendors, stores, and corporate can be confusing and can leave it unclear about who does what (ex: who monitors the amount of waste generated, and reports when necessary). In addition, corporate structure can limit actions an individual store can take without approval, which can slow down any implementation of needed changes (for example, one store we started working with the store manager, then the district manager, and then the corporate manager). However, in a corporate based system, if you can influence one store, it is likely you influence all stores within the state, and potentially the entire chain. In addition, at least two stores received our initial contact letter, did not have a system in place, scheduled a site visit a few months out, and had a system in place by the time we showed up for an inspection.

This campaign gave stores a local (and free) contact (us) to answer any questions or provide services if household hazardous waste was abandoned in their parking lot. We also provided all the pharmacies with information for their customers regarding where unwanted household pharmaceuticals and sharps can be disposed of. In addition, most hazardous waste management systems seem fairly new (within the past 5 years), and most stores seemed happy to be inspected to help justify the large cost of these programs.

**Compliance Results:** Since we were not enforcing current waste disposal practices or digging through garbage, the majority of stores received a Notice of Compliance (NOC) and any necessary information about how their waste should be disposed of from now on. Only one store had to take action before receiving a NOC (after adding in secondary containment for used oil). Additionally, three of the twenty-two pharmacies visited admitted to improperly disposing of some or of all their medical waste. These stores were told to stop this practice immediately and were provided information regarding proper disposal options.

**Best Management Practices:** Forty-five of the stores visited were recommended to incorporate at least one additional BMP into their hazardous waste storage and disposal system. Details of these recommendations can be seen in Appendix II.

**Survey Results:** Even with a pre-stamped envelope and multiple choice questions, only 12 of the visited stores sent back a survey. Seven of these stores indicated that we assisted them in making changes while the other 5 said they did not need to make any changes. The biggest concern about proper hazardous materials management and disposal listed was potential safety and liability risk followed by both the extra time it takes to properly manage the waste and understanding disposal regulations. Stores reported that they get their hazardous waste disposal information from corporate (7), their vendor (4), government sites (2), and/or MSDS Sheets (1). All stores indicated that the visit provided them with helpful information, and 10 of the stores indicated that they benefitted from the technical assistance program. They noted that they will or currently do use the County's hazardous waste hotline (7), our website (6), or HazoHouse (6). Comments included "we learned ways to reduce our waste," "County specialists gave us additional information and knowledge about state-only programs and abandoned waste," and "thanks for the help." None of the 12 surveys returned had any negative comments regarding this technical assistance program or our interaction with them.

## MEETING THE GOALS OF THE HAZARDOUS WASTE PLAN FOR THURSTON COUNTY

In the current (2014) Thurston County Hazardous Waste Management Plan, the Program Services Chapter (G) states that "the County will continue to deliver technical assistance services, such as campaigns for single-industry groups" under Small Business Technical Assistance. This "Business Pollution Prevention Program provides written educational materials, free on-site consultations, and technical assistance to attempt to resolve alleged hazardous waste violations voluntarily." Therefore, this retail and distribution center campaign helps the County meet this goal (SBTA-1).

This technical assistance program also helps the Thurston County Resource Stewardship Department satisfy NPDES (National Pollutant Discharge Elimination System) permit requirements for public education (Wester Washington Phase II Municipal Stormwater Permit, Section S5.C.1.a.ii).

## NEXT STEPS

We will attempt to share this report with all interested agencies and local business by making it accessible online on Thurston County's Business Pollution Prevention webpages or providing hardcopies when requested.

Re-visiting these stores in the near future is likely unnecessary unless responding to a specific complaint, a new store, or if the regulations change (EPA has started the process to update some of the regulations regarding retail stores).

The success of this campaign highlights the need for similar campaigns in other retail groups. Future campaigns should include visiting all pharmacies (since they have the biggest potential to exceed a SQG status with P-listed wastes, numerous different management options provided by Ecology, and 14% of the pharmacies visited during this campaign admitted to improper disposal practices), pet supply stores (many include veterinary clinics, which would have to be reviewed prior to visiting), and convenience/gas station stores (sell large amounts of hazardous materials such as cleaners and car fluids).

## FUNDING

Funding for this project was provided by a combination of Ecology's Coordinated Prevention Grants (W2RCPG-1517-ThCoPH-00086 & G1400119) and Thurston County Public Works' tipping fees.

## CONTACT INFORMATION

This report was prepared for the Washington State Department of Ecology Waste 2 Resources Program. For more information about this technical assistance campaign please contact:

Thurston County  
Environmental Health Division  
Solid & Hazardous Waste Section  
(360) 867-2664  
[www.co.thurston.wa.us/health/ehhw/](http://www.co.thurston.wa.us/health/ehhw/)

## APPENDIX I: HANDOUTS & RELATED MATERIALS

The following are example of both letters sent to stores and the handouts made available during site visits.



**THURSTON COUNTY**  
WASHINGTON  
SINCE 1852

COUNTY COMMISSIONERS

Cathy Wolfe  
District One

Sandra Romero  
District Two

Bud Blake  
District Three

## **PUBLIC HEALTH AND SOCIAL SERVICES DEPARTMENT**

Date

Store Name

Store Mailing Address

City, State Zip

Don Sloma, MPH  
Director

Rachel C. Wood, MD, MPH  
Health Officer

RE: 2015 Technical Assistance Campaign – Large Retail Centers and Distribution Warehouses for:

Store Name  
Store Site Address  
City, State Zip

Dear Environmental Compliance or Asset Protection Manager:

This year the Thurston County Business Pollution Prevention Program is conducting a Technical Assistance Campaign for large retail centers and distribution warehouses. The purpose of our campaign is to assess the storage and handling of hazardous chemicals (such as returned, expired, or broken cleaning supplies, fuels, pool and hobby products, etc.) and offer information regarding proper disposal. In addition, we will also suggest Best Management Practices as they pertain to waste storage, disposal, recycling, and waste reduction.

During our technical assistance visit (approximately 45 minutes), Thurston County staff will review your practices and provide information to help your business gain or maintain compliance with the Thurston County Nonpoint Source Pollution Ordinance as well as local sewer regulations (LOTT Wastewater Alliance). These regulations require the proper use, storage, and disposal of hazardous materials. If issues are found that cannot be corrected during the visit, we will conduct a follow-up visit to help your site attain compliance.

The Thurston County Environmental Health Division has been conducting Technical Assistance Campaigns since 1994. Past campaigns have included wrecking yards, automobile repair shop, marinas, commercial painters, photo processing, commercial printing, dental facilities, and school chemistry laboratories and have never included any financial penalties. This campaign is a continuation of our efforts to protect the public health and the environment by providing free assistance to businesses that store and dispose of hazardous wastes.

Please contact us within the next month to schedule a convenient time for your technical assistance visit. Businesses that do not schedule a visit will receive a drop-in site visit. We can be reached Monday through Friday during normal business hours or by email. We look forward to working with you.

Sincerely,

Rachel Brooks  
(360) 867-2584  
[brooksr@co.thurston.wa.us](mailto:brooksr@co.thurston.wa.us)  
Environmental Health Specialist  
Thurston County Health Department

Patrick Soderberg  
(360)867-2586  
[soderbp@co.thurston.wa.us](mailto:soderbp@co.thurston.wa.us)  
Hazardous Waste Specialist  
Thurston County Health Department



**THURSTON COUNTY**  
WASHINGTON  
SINCE 1852

COUNTY COMMISSIONERS

Cathy Wolfe  
District One

Sandra Romero  
District Two

Bud Blake  
District Three

**PUBLIC HEALTH AND  
SOCIAL SERVICES DEPARTMENT**

Date: \_\_\_\_\_

Art Starry, RS  
Interim Director

Rachel C. Wood, MD, MPH  
Health Officer

RE: 2015 & 2016 Technical Assistance Campaign –Retail Centers and Distribution Warehouses for:

**Store:** \_\_\_\_\_  
**Address:** \_\_\_\_\_  
\_\_\_\_\_

Dear Environmental Compliance or Asset Protection Manager:

This year the Thurston County Business Pollution Prevention Program is conducting a Technical Assistance Campaign for large retail centers and distribution warehouses. The purpose of our campaign is to assess the storage and handling of hazardous chemicals (such as returned, expired, or broken cleaning supplies, fuels, pool and hobby products, etc.) and offer information regarding proper disposal. In addition, we will also suggest Best Management Practices as they pertain to waste storage, disposal, recycling, and waste reduction.

During our technical assistance visit (approximately 30 minutes), Thurston County staff will review your practices and provide information to help your business gain or maintain compliance with the Thurston County Nonpoint Source Pollution Ordinance as well as local sewer regulations (LOTT Wastewater Alliance). These regulations require the proper use, storage, and disposal of hazardous materials. If issues are found that cannot be corrected during the visit, we will conduct a follow-up visit to help your site attain compliance.

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We stopped in to conduct a technical assistance visit to your store on the above date. If a site inspection was not conducted at that time, you may choose to schedule a visit at your convenience by contacting us. We can be reached Monday through Friday during normal business hours or by email. We look forward to working with you.

Sincerely,

Rachel Brooks  
(360) 867-2584  
[brooksr@co.thurston.wa.us](mailto:brooksr@co.thurston.wa.us)  
Environmental Health Specialist  
Thurston County Health Department

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Hazardous Waste Specialist  
Thurston County Health Department

**COMMERCIAL PARCEL INVENTORY FORM**

<b>INSPECTION:</b>	
County Staff: County Contact: (360) 867-2664	Visit Date: Time On Site:                      Time Off Site:
<b>BUSINESS INFORMATION:</b>	
Business Name:	Business Owner:
Site Contact (Name and Title):	
Site Address:	Mailing Address:
Phone:	Phone:
Parcel#:	Wellhead Protection Area: <input type="checkbox"/> No <input type="checkbox"/> 1 Yr <input type="checkbox"/> 5 Yr <input type="checkbox"/> 10 Yr
Nature of Property: <input type="checkbox"/> Home Business <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Agricultural <input type="checkbox"/> Government <input type="checkbox"/> Other	
Is the facility: <input type="checkbox"/> Owned <input type="checkbox"/> Rented/Leased            Year business began at this location? Historic site use/past businesses:	
<b>SITE INFORMATION:</b>	
Drinking water source: <input type="checkbox"/> City Water <input type="checkbox"/> Community well <input type="checkbox"/> Private Well <input type="checkbox"/> Unknown	
On-site well: <input type="checkbox"/> Not Applicable <input type="checkbox"/> Active <input type="checkbox"/> Inactive <input type="checkbox"/> Decommissioned, method/year:	
Floor drains: <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Sealed If yes, how many, where? Where do work area floor drains discharge? <input type="checkbox"/> Sewer: LOTT <input type="checkbox"/> Septic system <input type="checkbox"/> Dry well, ditch, storm pond <input type="checkbox"/> Sump or vault (sealed) <input type="checkbox"/> Unknown	
Floor cleaning: Method: <input type="checkbox"/> Soap/surfactant <input type="checkbox"/> Chemical degreaser <input type="checkbox"/> High-pressure water <input type="checkbox"/> Other: Wash water disposal: <input type="checkbox"/> Vendor <input type="checkbox"/> Sewer <input type="checkbox"/> Septic <input type="checkbox"/> Other: Is wash water mixed with other dangerous waste (oils, chlorinated solvents, etc): <input type="checkbox"/> No <input type="checkbox"/> Yes Dangerous waste testing: <input type="checkbox"/> No <input type="checkbox"/> Yes	
Oil/water separator: <input type="checkbox"/> No <input type="checkbox"/> Yes    Size: Discharge point: <input type="checkbox"/> Sewer <input type="checkbox"/> Septic <input type="checkbox"/> Storm water <input type="checkbox"/> Unknown <input type="checkbox"/> Drywell / Leachfield <input type="checkbox"/> Other: Maintenance/inspection frequency: Where is sludge disposed?	
Fuel or heating oil tanks (past or present): ___ AST(s)                      ___ UST(s)                      ___ Vehicle mounted Size of Tanks:                      Liquid Contained: Containment:                      Location:	
Hydraulic lifts (past or present): If yes, when were they removed:	
Safety Data Sheets for chemicals on-site: <input type="checkbox"/> No <input type="checkbox"/> Yes	
Available spill kits: <input type="checkbox"/> None <input type="checkbox"/> Mercury <input type="checkbox"/> Acid <input type="checkbox"/> Universal Absorbent <input type="checkbox"/> Other: Adequate:	



**Thurston County Health Department – Business Pollution Prevention Program**

General Retail			
BMPs	Already Doing	Suggested	Notes/Date Implemented
<b>EMERGENCY/SAFETY:</b>			
Write a spill plan			
Train staff regarding hazardous material use, spill protocols, chemical safety, and waste disposal			
Designate a “hazardous waste coordinator”			
Post contact number of emergency coordinator and the fire department, location of fire extinguisher, spill control materials, and fire alarms by all appropriate phones			
Have and maintain appropriate spill kits (acid, mercury, and/or universal absorbent)			
Keep up to date chemical inventories and Safety Data Sheets (SDS), add SDS when new products come in			
Maintain adequate safety equipment (proper eyewash, safety shower, appropriate fire extinguishers, and personal protective equipment)			
Have protocols in place for returned, broken, and/or hazardous waste items			
<b>HAZARDOUS WASTE STORAGE/CONTAINMENT:</b>			
Store chemicals properly: in designated accumulation areas, under shelter, not directly on the floor, away from frequently traveled areas			
Prepare for earthquakes with anchored and lipped shelving			
Separate incompatible chemicals using secondary containment (flammables/combustibles, acids, bases, oxidizers, pressurized, etc.), store dry chemicals above liquids, and keep flammables in approved cabinets			
Use containers that have tight fitting lids, no defects, are compatible with their contents, and that are kept closed except when adding waste			
Label all dangerous wastes, include a description of the waste in practical terms, all the major hazards associated with it, the accumulation start date, and “dangerous/hazardous wastes”			
Inspect accumulation areas routinely and keep an inspection log			
Locate all drains (inside and outside), identify where they drain to, plug or seal indoor drains within hazardous waste storage areas			
<b>RECYCLING/WASTE STREAMS:</b>			
Designate all wastes			
Monitor and understand generator status, report when necessary			
Maintain documentation of waste designation, hazardous waste generation, disposal, and recycling activities			
Recycle wastes when possible using an authorized facility			
Separate Universal Wastes (lamps, batteries, mercury-containing equipment) and manage appropriately (label, limit accumulation to one year, prevent releases, provide employee training)			
Separate electronic wastes and recycle appropriately: business should use the free ECycle program (televisions, computers, computer monitors, laptop computers, e-readers, tablets, portable DVD players)			
Remove excess accumulation of waste(s)			
If needed, appropriately use and maintain a catch basin and oil/water separator by routinely inspecting, cleaning, and testing it			
Substitute toxic chemicals with less-toxic products			
<b>OTHER:</b>			
Dumpster/solid waste accumulation area is protected from the rain, clean, and does not contain any dangerous wastes			

Inspection Date:  
 Business Name:  
 Inspector:

**Thurston County Health Department – Business Pollution Prevention Program**

Auto Repair / Pump Station			
<b>Type of mechanical work done:</b>			
<b>Number of tanks, volume, and content:</b>			
BMPs	Already Doing	Suggested	Notes/Date Implemented
Use less toxic chemicals or alternatives when possible (non-halogenated, non-chlorinated, or aqueous detergents/parts cleaner, bake-off ovens, dry pre-cleaning methods, etc.)			
Use engineering controls to transfer liquids (funnels, spigots, pumps, drip pans, automated systems etc.)			
Use dry absorbent cleaning methods first, then wash with water and collect rinse water when appropriate			
If necessary, appropriately use and maintain a catch basin and oil/water separator by routinely inspecting, cleaning, and testing it. Sludge may need to be disposed of as dangerous waste. Do not run detergent through the separator.			
Recycle: oil filters (drain for 24 hours and use crusher), used oil, batteries (manage as universal waste), transmission fluid, hydraulic fluid, antifreeze, solvents, brake fluid, tires, and scrap metal			
Use recyclable shop towels, once used, label in closed containers			

Photo Development			
<b>Type of photo processing (%):</b>			
<b>Silver recovery system:</b>			
<b>Type (single/dual chem. recovery cartridges, electrolytic):</b>		<b>Monthly Volume of treated waste:</b>	
<b>How often is the system used:</b>		<b>Who/how often is it serviced:</b>	
<b>Service records/log book:</b>		<b>Sampling port:</b>	
<b>Silver and pH tests conducted:</b>			
BMPs	Already Doing	Suggested	Notes/Date Implemented
Increase the use of digital technology			
Use and manage a silver recovery system appropriately (use two chemical recovery cartridges in a series, test monthly for silver and pH from a sample port located between the cartridges, keep a sample and maintenance log book, and meet local sewer discharge limits before discharging any chemical into the sewer system)			
Have adequate ventilation in lab area			
Use less toxic chemicals when possible (inks that are water-based and/or free of heavy metals, less toxic solvents (i.e. non-chlorinated))			
Unprocessed film: send to a silver recycler			
Processed film: not hazardous recyclable or solid waste			
Used developer: is not hazardous, disposed of in the sewer, do not put through a silver treatment system <u>or</u> send off site as dangerous waste for disposal or recycling (Note: <u>unused</u> developer is hazardous and must be sent off site as dangerous waste for disposal or recycling)			
Fixer/bleach-fixer solutions/bleach solutions/stabilizer/wash water: treat with a silver recovery system, test monthly, and discharge in sewer <u>or</u> send off site as dangerous waste for disposal or recycling (counts towards generator status)			
Photographic solution filters/cleaning wastes: hazardous, should be sent off site as dangerous waste for disposal or recycling			
Inks: should be solidified and treated as solid waste, or disposed of as dangerous waste			

Inspection Date:  
 Business Name:  
 Inspector:

**Thurston County Health Department – Business Pollution Prevention Program**

Pharmacy			
<b>Type of pharmacy: compounding, veterinary, dispensary</b> <b>Vaccinations given?</b> <b>Regulation/policy following &amp; for what:</b> <ul style="list-style-type: none"> <li>• Interim Enforcement Policy (IEP) for Pharmaceutical Waste (must notify DOE)</li> <li>• Conditional Exclusion (CE) for State-Only Pharmaceutical Wastes</li> <li>• Dangerous Waste Regulations (DW)</li> </ul>			
BMPs	Already Doing	Suggested	Notes/Date Implemented
Limit generator status by using the IEP and/or the CE policies			
Have a protocol that designates all waste (DW&CE) or establishes a waste profile (IEP)			
Limit waste accumulation amount and time accumulated materials are kept on site			
Store wastes properly using appropriate containers, separate incompatibles, place absorbent material in the bottom of containers storing liquid wastes, keep containers closed, label properly, store dual wastes separately			
Appropriate spill kit and PPE available			
Inspect accumulation area regularly			
Train staff with all safety and emergency procedures, proper waste management, and record keeping			
Dispose of pharmaceutical waste in a RCRA permitted incinerator (or state-only to an incinerator that meets CE standards or dual waste to a RCRA and infectious waste permitted incinerator). Only sewer saline, dextrose, and sterile water without vitamins or additives and with permission from LOTT			
Manage empty containers of liquid P-listed waste appropriately			
Use reverse distribution whenever possible including using a DEA licensed reverse distributor when necessary for viable and un-viable controlled substances (no other wastes)			
Keep appropriate records (Uniform Hazardous Waste Manifests, annual reports, exception reports, designation/profile documentation, reverse distributor documents)			
Use good inventory controls to limit extra waste, analyze why/how wastes are generated, and identify p-listed products that contain less packaging			
Manage sharps appropriately in hard sharps container, and dispose through a vendor (unless you have permission from your solid waste disposal company to dispose of as solid waste)			
Provide customers with household prescription medication disposal information for their leftover waste (free from Thurston County)			

Inspection Date:  
 Business Name:  
 Inspector:

## Hazardous Waste Factsheet

*“The Health Department's approach to compliance assumes that the majority of hazardous waste generators want to ‘do the right thing’ and simply need to recognize how to make it happen.”*

Thurston County  
Public Health & Social Services  
Environmental Health Division

412 Lilly Road NE  
Olympia, WA 98506-5132

Hazardous Waste Hotline:  
460-867-2664

TDD: 360-867-2603

[www.co.thurston.wa.us/health](http://www.co.thurston.wa.us/health)

# Compliance with the Nonpoint Source Pollution Ordinance

This fact sheet describes the Thurston County Health Department's approach to implementing the hazardous waste sections of the Nonpoint Source Pollution Ordinance (Article VI of the Sanitary Code) and explains the procedures that govern its enforcement.

The ordinance, which took effect in May 1993, is part of the Business Pollution Prevention Program's efforts called for in the county's Hazardous Waste Plan and supported by Thurston County and its incorporated cities.

## PROACTIVE AND REACTIVE FIELD INSPECTIONS

The Health Department implements the ordinance with either a proactive or reactive approach.

Proactive inspections – those in which the Health Department takes the initiative to approach businesses rather than waiting for inquiries or complaints – will be directed, within a limited time frame, at all businesses of a given type, and will be preceded by an opportunity for education about the ordinance. The process is designed to resolve all violations while avoiding inequitable or arbitrary enforcement of the ordinance among different competitors in the same field.

When the Health Department receives a complaint from the public about a violation of the ordinance, the Department reacts to the report and begins an investigation. In these cases, enforcement action may be taken if appropriate corrective actions are not taken in a timely manner.

Nonetheless, the goal is still to correct the violation rather than issue tickets, so field staff will work as constructively as possible with the violator to accomplish the required corrective actions.



THURSTON COUNTY  
WASHINGTON  
SINCE 1852

## WHAT THE ORDINANCE SAYS

The following is an excerpt from Article VI, Section 4 of the Sanitary Code:

- 4.1 (a) Moderate risk waste and petroleum products including, but not limited to, oil and grease, shall be disposed of by recycling or use of a hazardous waste management facility operating under interim status or with a permit issued by EPA or an authorized state . . . No person shall, intentionally or negligently, dump or deposit, or permit the dumping or depositing of any such waste in any other manner, including onto or under the surface of the ground or into surface or ground water.
- 4.1 (b) Moderate risk waste, petroleum products, and hazardous materials shall be kept in containers and shall be stored in such a manner and location that if the container is ruptured, the contents will not discharge, flow, be washed or fall into surface water or ground water.
- 4.1 (c) Any person violating this section or owning or in possession of the premises, facility, vehicle or vessel from or on which waste is discharged or placed in violation of this section, shall notify the Department of the location and nature of the violation and shall immediately take or cause to be taken all necessary steps to prevent injury and protect waters from pollution.

## IF HEALTH DEPARTMENT STAFF OBSERVE A VIOLATION OF ARTICLE VI . . .

**Field staff are provided with three options for response to violations.** The ordinance specifies that compliance officers must respond to any violation they believe has occurred or is occurring.

The three options are:

- an informal notification to the violator explaining the violation and recommended options for correcting the problem;
- a Notice of Violation, which begins formal administrative enforcement; and
- a Notice of Civil Infraction, which is similar to a traffic citation in that it carries a fine and is resolved in court.

Which option is used will depend on the type and severity of the violation and prior opportunities the violator has had to learn about and comply with the law. It is important to understand that, regardless of the initial response chosen and time frame allowed, the ordinance requires the Health Department to follow-up with increasingly stronger measures until the violation is eventually corrected.

## IF YOU RECEIVE AN INFORMAL NOTICE CONCERNING COMPLIANCE WITH ARTICLE VI . . .

.

**An informal notification offers an opportunity to comply voluntarily.** The Health Department's approach to compliance assumes that the majority of hazardous waste generators want to "do the right thing" and simply need to recognize how to make it happen. The informal notification would typically consist of a letter or notice of noncompliance following a voluntary technical assistance visit during which a violation was observed. It is intended to help the business understand the reason for the violation and the options available for correcting the problem. This notification will not specify an exact time frame for compliance.

## IF YOU RECEIVE A FORMAL COMPLIANCE INSPECTION . . .

A formal compliance inspection involves a visit to your business by a county hazardous waste specialist. The specialist will examine your facilities and practices with respect to two issues:

- management of hazardous wastes and petroleum products (all must be recycled or sent to a permitted disposal facility); and
- storage of hazardous wastes, petroleum products and hazardous products (all must be kept from reaching ground or surface water).

At the end of a compliance inspection, you will receive a Notice of Compliance, a Technical Assistance Notice of Noncompliance, or a Notice of Violation, described briefly here.

**A Notice of Compliance documents your good-standing at the time of the inspection.** If you are managing your hazardous wastes properly – either recycling them at your facility or sending them to another facility for disposal or recycling – you will receive a Notice of Compliance for you to file as a record of your status. If you are recycling the waste on site, the inspector will need to see the recycling methods and/or equipment used and may want to verify the proper operation of the equipment. If you are sending the waste off site, the inspector will need to see documentation of at least one recent pick-up that includes the name and phone number of the collection service.

Please note that a Notice of Compliance documents your status only with respect to the County's Nonpoint Source Pollution Ordinance and only on the day of the inspection. It does not preclude a later change in status if your practices change, or if new information indicates the inspection results were inaccurate. It also does not comment on compliance with any other laws you may be subject to, such as fire, building, zoning, licensing, and worker safety regulations.

**A Technical Assistance Notice of Noncompliance identifies why the site is out of compliance.** A Technical Assistance Notice of Noncompliance typically is used for lack of secondary containment or lack of waste disposal documentation. It is signed by both the violator and the inspector and includes a mutually agreeable grace period for the site to come into compliance.

**A Notice of Violation is the first step in the “formal” administrative enforcement process.** Field staff would typically issue a Notice of Violation (NOV) in cases where the alleged violator has already had at least one opportunity to learn about, and comply with, the ordinance. It may also be issued immediately in cases of flagrant or particularly negligent violations. The NOV can be presented to the violator in person or sent by registered or certified mail. It will state the section of the ordinance that was or is being violated, a brief description of facts supporting this finding, a list of actions that must be taken to resolve the matter, and a date by which these actions must be taken. The process for responding to an NOV and your rights under this process are described on the back of the NOV. Some important elements of this process are listed below.

- **You have the right to appeal.** You may do so by submitting a written request for an administrative hearing to the Health Officer at the Thurston County Health Department, 412 Lilly Rd NE, Olympia WA 98506, within ten days of the date of issuance of the Notice of Violation.

- **Corrective actions are postponed until after the hearing.** If you file a request for a hearing, you may temporarily postpone taking corrective actions pending the hearing outcome.
- **Administrative hearings allow an opportunity to present evidence that you did not violate the ordinance.** Evidence may include testimony of witnesses, affidavits and documents, and other exhibits such as photographs.
- **You may appeal the results of an administrative hearing.** If you are unsatisfied with the results of an administrative hearing, you may appeal these findings to the Thurston County Board of Health.

## **IF YOU RECEIVE A NOTICE OF CIVIL INFRACTION . . .**

Violations of Article VI of the Sanitary Code are civil infractions enforceable by the court and subject to fines of up to \$498 (including court costs). Once a Notice of Violation has been issued, the process of issuing and enforcing a civil infraction will not begin until and unless the administrative process described above runs its course without resolution. If you do not, in the specified time frame, take the actions required by a Notice of Violation, or those required by a subsequent administrative or Board of Health hearing, you will be issued a Notice of Civil Infraction (a “ticket”), which is handled similarly to a traffic citation. You may:

- Pay the penalty;
- Request a hearing to contest or explain the circumstances of the alleged violation; or
- Ignore the ticket, which would automatically result in your being found guilty and responsible for the full amount of the fine.

The Notice of Civil Infraction, when issued, explains in more detail your rights under the civil process.

**If you would like a copy of the Thurston Count Nonpoint Source Pollution Ordinance or any part of the Sanitary Code, or if you have questions on this enforcement process, please call the Business Pollution Prevention Program at (360) 867-2664 or TDD (360) 867-2603, Monday through Friday from 8:00 a.m. to 5:00 p.m. or see our website: [www.co.thurston.wa.us/health/ehhw/index.html](http://www.co.thurston.wa.us/health/ehhw/index.html)**

## **Other Hazardous Waste Management and Disposal Fact Sheets**

- *Antifreeze, Used Oil, & Oil Filters*
- *Floor Drains*
- *Hazardous Waste Disposal for Thurston County Businesses*
- *Oil/Water Separators*
- *Residential Heating Oil Tanks*
- *Secondary Containment*
- *Solvents and Parts Cleaners*
- *Storing and Labeling Hazardous Waste*
- *Used Shop Towels*

# DANGEROUS WASTE STORAGE GUIDE

This guide should be used as a reference only. All businesses must identify their dangerous wastes (regardless of how little they produce) and determine what they must do under the law.



## LABELS

Overall, dangerous wastes should be marked with the words "hazardous waste" or "dangerous waste," an easily understood description of the waste, the date the waste was first placed in the container, and all associated hazards. To print free labels, visit: [www.ecy.wa.gov/programs/hwtr/hw\\_labels/](http://www.ecy.wa.gov/programs/hwtr/hw_labels/)

## STORAGE GUIDELINES



### FLAMMABLE

Keep in a flammables cabinet, use secondary containment (compatible plastic tub). Store in a manner equivalent with the Uniform Fire Code.



### OXIDIZERS

Isolate oxidizers from all other waste types. Store in secondary containment (plastic tubs, ideally lidded) on metal shelving.



### BASES (pH ≥ 12.5)

Store in secondary containment (plastic tub) on metal shelving.



### ACIDS (pH ≤ 2)

Store in secondary containment (plastic tub) on metal shelving.



### TOXICS

Store in secondary containment (plastic tub) on metal shelving.

### GENERAL

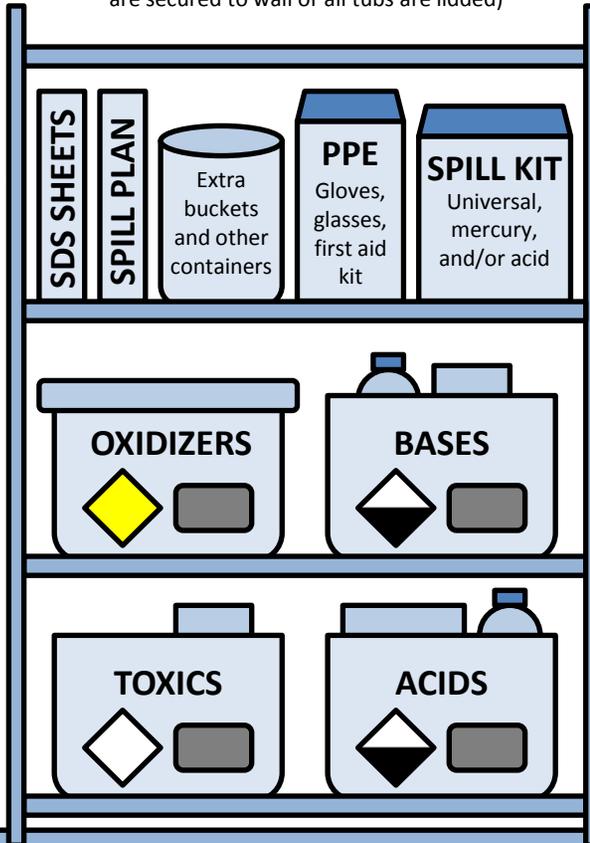
- Store solid waste above liquid wastes.
- Isolate incompatible wastes (when in doubt, isolate a waste from all other wastes). Some businesses bag every waste prior to placement in container.
- Secure and label hazardous waste storage area to limit access from untrained employees or public.
- Keep dangerous waste storage area under cover and out of weather.
- Secondary containment should be at least 110% the volume of the largest container or 10% of all the containers volume (whichever is larger).
- Keep all waste containers closed, except when filling.

## WASTE ACCUMULATION AREA



### METAL SHELVING

(Earthquake resistant: shelves have lips and are secured to wall or all tubs are lidded)

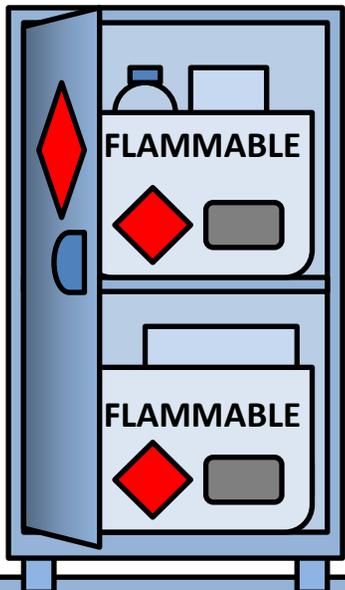


Emergency Contact Numbers



### FLAMMABLES CABINET

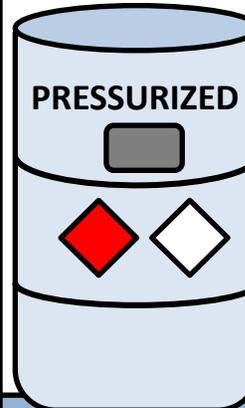
(Approved flammables cabinet)



Maintain at least 30" of aisle space between container rows

### METAL CONTAINER

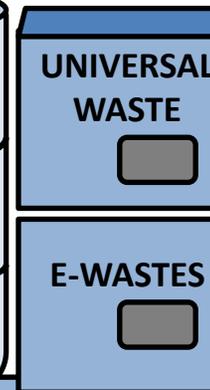
(55 gallon drums work well)



Seal or plug floor drains

### CARDBOARD BOXES

(Keep closed except when filling)



# COMMON DANGEROUS WASTES: Retail and box stores

The following list of common dangerous wastes is not comprehensive. All businesses must designate their wastes and determine what they must do under the law.

## FLAMMABLE

- Acetone
- Alcohols (rubbing or isopropyl)
- Camp fuel (white gas), kerosene
- Charcoal lighter fluid
- Paint thinner
- Solvents
- Oil-based paints
- Many other materials

**Special Considerations:** Flammable pesticides should be stored in a flammables cabinet.

## OXIDIZERS

- Ammonium Nitrate (fertilizer)
- Bleach (sodium hypochlorite)
- Hydrogen peroxide
- Toilet/drain cleaners (with bleach)
- Swimming pool chlorinator tabs or granules
- Many other materials

**Special Considerations:** Store only the same oxidizer products together, in individual secondary containment. Some acids and bases are oxidizers.

## TOXICS (POISONS)

- Antifreeze
- Disinfectants
- Pesticides including herbicides, fungicides, and insecticides (non-flammable)
- Liquid soaps and detergents
- Non-aerosol insect repellents
- Many other materials including medications, cosmetics, and detergents classify as toxics.

## BASES

- Ammonia
- Lime
- Lye
- Oven Cleaners
- Many other materials

## ACIDS

- Acetic Acid
- Boric acid
- Etching solution
- Muriatic Acid (hydrochloric acid)
- Navel jelly
- Sulfuric acid
- Many other materials

## PRESSURIZED

- Aerosols
- Air fresheners
- Bug spray
- Spray paint
- Other pressurized materials

## UNIVERSAL WASTES

- Batteries (alkaline, mercuric-oxide, alkaline-manganese, zinc-carbon, zinc air, button cell mercuric oxide, silver oxide, lithium, nickel-cadmium)
- Mercury-containing equipment (thermometers, barometers, manometers, relay and tilt switches)
- Lamps (fluorescent tubes, compact fluorescent, HID lamps including mercury vapor, metal halide, and high-pressure sodium, neon lamps)
- Note: Limit accumulation to one year

## E-WASTES

- Monitors, lap tops, televisions, stereos
- Note: limit accumulation to 180 days

## WHAT IS A DANGEROUS WASTE?

A dangerous waste is a solid, liquid, or gas that poses dangers to human health or the environment. On products that have become wastes, look for the words "**Danger**," "**Caution**," "**Flammable**," "**Toxic**," "**Corrosive**," "**Warning**," and "**Poison**."

Questions? Please call the Thurston County Hazardous and Solid Waste Hotline for free technical assistance at 360-867-2664.

# Hazardous Waste Factsheet

## BASIC SPILL PLAN for Small Quantity Generators

Thurston County  
Public Health & Social Services  
Environmental Health Division

412 Lilly Road NE  
Olympia, WA 98506-5132

Hazardous Waste Hotline:  
460-867-2664

TDD: 360-867-2603

[www.co.thurston.wa.us/health](http://www.co.thurston.wa.us/health)

### Business Name:

Site Address:

Phone Number:

*It is important that employees are trained to identify hazardous chemicals, how to carry out the spill plan, and are familiar with the available spill kit(s), Safety Data Sheets, and personal protective equipment available.*

### Dangerous Liquid Spills:

1. Assess the spill by identifying the hazard of what spilled:
  - a. If appropriate, proceed with cleanup OR
  - b. Call for emergency response (if the spill is large or otherwise uncontrollable, or poses an immediate risk to human health, safety, or the environment)

**Fire/Police:** 911

**Ecology Spill Response:** (360)407-6300

2. Put on personal protective equipment as needed (reference the original product container label as a guideline)
3. Stop the source of the spill and cover/block any drains in the spill area
4. Neutralize spill if it is acidic, basic, or corrosive
5. Absorb all free liquids with absorbent
6. Using a dustpan and broom, place contaminated absorbent material and original chemical container in a large Ziploc bag or 5-gallon bucket and seal. Label if original container's label is not visible
7. Place bag or bucket into the appropriate hazardous class storage area (i.e. flammable, toxic, oxidizer, acidic, or basic) until sent to HazoHouse or other licensed vendor

### Fluorescent Bulb Breakage:

1. Avoid touching broken materials, if possible do not vacuum or sweep
2. Wear disposable latex or nitrile gloves and a dust mask (optional, to help avoid breathing vapors)
3. Use stiff paper or cardboard to pick up large pieces
4. Use duct tape to pick up the small pieces and powder
5. Wipe area clean with a damp paper towel or wet wipe
6. Place all wastes in a sealed container (such as a Ziploc bag)
7. Recycle through HazoHouse or other licensed vendor
8. Wash your hands

### Emergency Contacts (names and phone numbers):

Spill Contact Person:

Manager:

Other:

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---



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### List and Location of Personal Protection Equipment (PPE):

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### List and Location of Spill Cleanup Equipment Available:

*\*This basic spill plan may not be appropriate for all business types. Please consult with a Certified Industrial Hygienist or the Washington State Department of Ecology to determine additional response actions and/or personal protective gear and equipment that may be required for your business.\**



## Related Dangerous Waste Information for Small Quantity Generators

### Personal Protective Equipment (PPE)

Suggested PPE to have on site includes appropriate chemically resistant gloves (such as nitrile), safety goggles or glasses, splash aprons, and dust masks (N95). More specialized PPE may be necessary based on specific dangerous materials that your business handles or stores.

### Suggested Spill Cleanup Kit Contents

Suggested spill kit contents include Ziploc bags of varying sizes, garbage bags, absorbent material (kitty litter, absorbent pads, floor sweeping compounds, etc.), a dust pan and broom, a sharpie for labeling, duct tape and stiff paper for fluorescent bulb breaks, and absorbent material made to neutralize acid or base liquids (such as baking soda).

### Spill Plans & Training

Accidental spills of dangerous materials or dangerous waste can negatively impact public health and the environment. Business owners that use and store dangerous substances should take steps to prevent spills from happening and know what to do in case a spill does occur. Proper training and spill response can reduce injury and cleanup costs.

### Safety Data Sheets

Safety Data Sheets (SDSs) are replacing the Material Safety Data Sheets (MSDSs) as the primary source for detailed hazard information about chemical products. Businesses where employees only handle chemicals in sealed, unopened containers (such as retail stores), must ensure that SDSs for these chemicals are readily accessible during each work shift to employees (WAC 296-901-14001(4)). SDSs can be obtained from the product's manufacturer, the product vendor, through a vendor contract, or through a variety of free or purchased databases (free databases include [www.msdsxchange.com/english/index.cfm](http://www.msdsxchange.com/english/index.cfm), [hazard.com/msds/index.php](http://hazard.com/msds/index.php), and <http://msds.ohsa.bc.ca/>).

### Waste Definition

If you no longer have a use for products containing dangerous materials, they are considered a waste. This includes materials that cannot be sold or donated, such as broken or expired items. If a product is sent back to a distributor for credit, it is not considered a waste.

### Designating Dangerous Wastes

It is a business's responsibility to identify all dangerous waste that they produce (regardless of how little) and determine what they must do under the law. Dangerous wastes include both listed wastes and wastes that are ignitable, corrosive, reactive, and toxic (WAC 173-303). The Washington State Department of Ecology has a step-by-step guideline to help you understand how to designate dangerous wastes (<http://www.ecy.wa.gov/programs/hwtr/designation/index.html>).

### Washington "State-Only" Wastes

Did you know that Washington State has additional dangerous waste requirements in addition to the federal requirements (similar, but not identical to California)? These rules increase the type of toxic and persistent chemicals that are classified as dangerous wastes. To designate "state-only" toxic wastes, laboratory tests or toxicity databases are used to determine if items are considered dangerous wastes. "State-only" persistent wastes include polycyclic aromatic hydrocarbons and halogenated organic compounds that, at certain concentrations, need to be managed as a dangerous waste. If your business uses a corporate based program to manage dangerous wastes, you need to confirm that their designation protocol is up to Washington State's standards (using California's regulations is not sufficient).

### Empty Containers

Containers that once held dangerous waste can be handled as non-dangerous solid waste if they fit the definition of "empty containers" (WAC 173-303-160) and are not classified as holding a p-listed waste (WAC 173-303-9903). Containers are considered empty when all contents have been removed by normal means, such as inverting and draining, shaking, scraping, or scooping. Containers less than 110 gallons in size are empty when no more than one inch or 3 percent of container content remains, whichever is smaller. Containers holding compressed gases (such as aerosol cans) are considered empty when the pressure inside the container is equal or nearly equal to atmospheric pressure.

### More Information

Small businesses may dispose of their dangerous waste for a small fee at the Thurston County HazoHouse (2420 Hogum Bay Road NE, Olympia, WA). Please call us at (360) 867-2664 for more information.

**Dangerous Waste Assistance for:**  
**Retail Centers and Distribution Warehouses**

The following is a partial list of vendors that can assist your business with dangerous waste management, disposal, compliance, and transportation. Listing does not constitute an endorsement of the vendor. Protect yourself by making sure the vendors you hire are responsible.

- **Emerald Services, Inc. (Seattle):** (888)832-3008
- **Phoenix Environmental Services (Tacoma):** (888)475-0116
- **Safety-Kleen (Auburn):** (253)939-2022
- **Stericycle (Seattle):** (877)927-8311
- **Thurston County HazoHouse (Lacey):** (360)867-2664
- **Univar USA (Kent):** (253)872-5000 & (206)396-3499
- **Veolia Environmental Services (Kent):** (425)272-0772
- **Waste Management, Inc. (Seattle):** (800)963-4776
- **WasteXpress (Tacoma):** (855)224-3206



## Secondary Containment

Four secondary containment options will satisfy Thurston County regulatory requirements.

- 1) Store indoors on a liquid-tight floor *if* the storage area is able to contain 100 percent of the largest container and prevent it from flowing out of the building.
- 2) Store in **covered** secondary containment that can hold 110 percent of the volume of the largest container *or* 10 percent of the total volume stored, whichever is greatest, plus the displacement of any items inside the containment.
- 3) Store in **uncovered** secondary containment that can hold 120 percent of the volume of the largest container *or* 10 percent of the total volume stored, whichever is greatest, plus the displacement of any items inside the containment.
- 4) Store in UL-certified double-walled storage tanks.

## Disposal Receipts

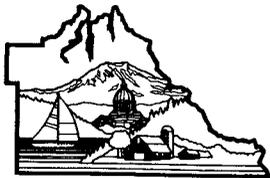
Maintaining disposal receipts is important to document proper disposal or recycling of hazardous waste. Providing a copy of the receipts from the most recent waste pick up will demonstrate proper waste disposal and compliance with the Thurston County Sanitary Code. Please retain copies of each hazardous waste pick up or disposal at a licensed facility so your business can verify compliance and hazardous waste generator status.

## Compliance Procedures

A Notice of Noncompliance is an **informal** means to alert the business owner to a violation of the Sanitary Code. The violation requires action by the business owner, but does not represent an immediate health threat. It allows the business owner and the health representative a means to resolve the compliance issues in a timely manner. A reasonable timeline for compliance is included with the notice.

If the business owner fails to meet the agreed upon timeline for compliance, the health representative may allow additional time to comply with the notice.

If the health representative believes the business owner is not attempting to comply with the Notice of Noncompliance, a **Notice of Violation** will be issued. A Notice of Violation is the beginning of the **formal** enforcement process.



Thurston County Public Health and Social Services Department  
Environmental Health Division

THURSTON COUNTY  
Since 1852

Nonpoint Source Pollution Ordinance Inspection Checklist

Business Name \_\_\_\_\_ Phone \_\_\_\_\_

Business Owner \_\_\_\_\_ Birthdate \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Compliance Officer \_\_\_\_\_ Issue Date \_\_\_\_\_ Time \_\_\_\_\_

MODERATE RISK WASTE: \_\_\_\_\_ Avg. Qty/Mo \_\_\_\_\_

NOTICE OF COMPLIANCE

NO MODERATE RISK WASTE GENERATED.

Explain: \_\_\_\_\_

RECYCLED Type of system: \_\_\_\_\_

ON-SITE Qty/Mo: \_\_\_\_\_ Date of installation: \_\_\_\_\_

SENT Vendor: \_\_\_\_\_ Phone: \_\_\_\_\_

OFF-SITE Qty/Mo: \_\_\_\_\_ Date of last shipment: \_\_\_\_\_

Documentation verified.

SECONDARY CONTAINMENT ADEQUATE. \_\_\_\_\_

NOTICE OF VIOLATION

I find you in violation of Thurston County Sanitary Code, Article VI, Section 4.1(a), 4.1.(b) OR 4.1(c) as specified below:

Description of violation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Corrective action to be taken by \_\_\_\_\_ (date) will be as follows: \_\_\_\_\_

\_\_\_\_\_

*See reverse for important information on your right to appeal this notice of violation.*

Compliance officer: \_\_\_\_\_ Date: \_\_\_\_\_

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Thurston County Public Health and Social Services Department  
Environmental Health Division

### **Right to Appeal**

The Thurston County Sanitary Code, Article I, Section 7.3, provides you with the right to appeal this Notice of Violation by requesting an administrative hearing. Such a request must be made in writing to the Health Officer at the Thurston County Health Department, 2000 Lakeridge Drive SW, Olympia, WA 98502-6045, within ten (10) days of the date of issuance of this Notice of Violation. If you file an appeal in this manner, a hearing to consider your case will be held within fifteen (15) days of your filing. The Health Officer or a designated hearings officer will notify you of the date and time of the hearing at least three (3) days prior to the hearing.

### **Stay of Corrective Actions**

If you file an appeal, it operates as a stay of the corrective actions specified in the Notice of Violation, unless you are issued a separate emergency order requiring immediate action. In other words, you may temporarily postpone taking the corrective actions pending the outcome of the administrative hearing.

### **Administrative Hearings Procedures**

Administrative hearings are designed to be informal forums for considering grievances of those accused of violating the Thurston County Sanitary Code. Both Health Department staff and the alleged violator will have the opportunity to present evidence supporting or refuting the claim that a violation occurred and that the accused is responsible for the violation. Evidence may include testimony of witnesses, affidavits and documents, and other exhibits such as photographs. The hearings officer determines the relevance and weight of the evidence offered; the legal rules of evidence are not required.

After all evidence has been presented, the hearings officer will make a decision within five (5) working days. The decision will be provided in writing to the accused violator and will include a statement of the findings of the hearing. If it is determined that a violation has occurred and that the accused is responsible, the written decision will specify the required actions and timeframe for taking such actions. The accused violator then has the right to appeal these findings and actions to the Thurston County Board of Health pursuant to the procedures specified in the Thurston County Sanitary Code, Article I, Section 8.6.

### **Failure to Take Action**

Violations of Article VI of the Sanitary Code are civil infractions enforceable by the court and subject to fines of up to \$475. If you do not, in the specified timeframe, take the actions required by this Notice of Violation, or those required by a subsequent administrative or Board of Health hearing, you will be issued a notice of civil infraction which is handled similar to a traffic citation. The notice of civil infraction, if issued, explains in more detail your options and rights under the civil process.

**For a copy of the Thurston County Sanitary Code  
or other information related to this notice,  
please call the Health Department at 754-4111.**

# Thurston County Business Pollution Prevention Program

## Customer Survey: Large Retail Centers/Distribution Warehouses

1. Was your business in compliance at the conclusion of the initial visit?

Yes       No       Unsure

If not, were you in compliance by the end of the technical assistance campaign?

Yes       No       Unsure

2. Did the visit assist you in making changes in the way you manage your hazardous materials/waste?

Yes       No       No changes needed

Please describe:

3. What concerns you most about proper hazardous materials management and disposal?

- Waste disposal costs
- Equipment costs (i.e. spill kits, etc.)
- Knowing where to obtain disposal information
- Understanding disposal regulations
- Extra time it takes to ensure proper handling, storage, and disposal
- Potential safety and liability issues

4. Where do you get your information regarding hazardous materials management?

5. Did you have any specific questions during the site visit?

Yes       No

Please describe:

If so, did the county specialist provide specific answers that addressed your questions?

Yes       No       Unsure

Comments:

6. Was the county specialist knowledgeable?

Yes       No

7. Did the visit provide you with helpful information?

Yes       No       Unsure

8. Overall, did your business benefit from the technical assistance program?

Yes       No       Unsure

Comments:

9. In addition to technical assistance programs, Thurston County Environmental Health provides businesses with the following resources. Do you currently or will you now utilize any of these resources:

- A hazardous material/waste hotline (360-867-2664)
- A hazardous waste disposal site (Thurston County HazoHouse)
- Website ([www.co.thurston.wa.us/HEALTH/ehhw](http://www.co.thurston.wa.us/HEALTH/ehhw))

10. Are there additional services Thurston County Environmental Health can provide to businesses that manage hazardous materials?

Yes       No       Unsure

Please list examples of services and topics your business would like to see:

11. Please share any additional comments. Your suggestions help us improve our services. Thank you!

Please return completed survey to:

**ATTN: Rachel Brooks**  
**Public Health and Social Services Department**  
**412 Lilly Road NE**  
**Olympia, WA 98506-5132**

## APPENDIX II: BMP RESULTS

This table summarizes the Best Management Practices (BMPs) list completed at 57 stores. It also includes general comments regarding the BMPs. Please refer to handout to see full language of each BMP listed.

Best Management Practice	Findings (numbers, comments, etc.)
General Retail (57 total)	
Write a Spill Plan	<ul style="list-style-type: none"> <li>• 38 stores already had a written spill plan</li> <li>• 2 did not need a spill plan (no liquid hazardous wastes)</li> <li>• 17 stores did not have a written spill plan, these stores were provided with the basic spill plan handout (see Appendix I)</li> </ul>
Train staff regarding hazardous material use, spill protocols, chemical safety, and waste disposal	<ul style="list-style-type: none"> <li>• 45 stores already trained staff</li> <li>• 12 stores did not already train staff (this included mainly stores that did not have a hazardous management system in place)</li> </ul>
Designate a “hazardous waste coordinator”	<ul style="list-style-type: none"> <li>• 49 stores already had someone in charge, usually a manager</li> <li>• 8 stores did not have a specific person in charge of monitoring hazardous waste</li> </ul>
Post emergency contact information by all phones	<ul style="list-style-type: none"> <li>• 40 stores already posted emergency contact information</li> <li>• 12 stores did not have any emergency contact info posted by phones</li> <li>• 5 stores had emergency contact info, but not by appropriate phones</li> </ul>
Have and maintain appropriate spill kits (acid, mercury, and/or universal absorbent)	<ul style="list-style-type: none"> <li>• 39 stores already had appropriate spill kits materials (either in one area or throughout the store). This includes stores that both had traditional kits, kept materials throughout the store, or just used all the appropriate items they had on their shelf when needed</li> <li>• 10 stores did not have any spill kits</li> <li>• 6 stores needed to update or add something to their spill kit (4 were asked to add neutralizer because they were handling large lead/acid batteries, 1 was asked to add a universal absorbent, and 1 needed to get more gloves)</li> <li>• 2 stores did not need a spill kit (no liquid waste)</li> </ul>
Keep up-to-date chemical inventories and Safety Data Sheets (SDS), add SDS when new products come in	<ul style="list-style-type: none"> <li>• 46 stores already had up-to-date SDSs. In some cases, it took some time for an employee to identify where or what the SDSs were</li> <li>• 9 stores had some SDSs but needed to update certain aspects (6 needed to confirm they were easily accessible to all staff, 2 needed to add in SDS sheets for items sold, 1 needed to update all of their SDSs)</li> <li>• 2 stores did not have any SDSs</li> <li>• Keeping appropriate SDSs for large stores can be tedious, as SDSs are needed for not just products used, but also for ones that are just sold. Most stores pay a company to manage their SDSs for them (who make SDSs available either by phone/fax or online)</li> </ul>
Maintain adequate safety equipment	<ul style="list-style-type: none"> <li>• 57 stores appeared to have enough available safety equipment</li> </ul>
Have protocol in place for returned, broken, and/or hazardous waste items	<ul style="list-style-type: none"> <li>• 45 stores had some level of appropriate protocols in place</li> <li>• 12 stores did not have any formal procedure for what to do when waste was generated. Stores without procedures were mostly smaller stores that were locally owned and managed</li> </ul>
Store chemicals properly: in designated accumulation areas, under shelter, not directly on the floor, away from frequently traveled areas	<ul style="list-style-type: none"> <li>• 45 stores already stored chemicals properly</li> <li>• 2 stores just needed to make a small change (1 should obtain a larger tote and 1 should latch their oil funnel)</li> <li>• 10 stores needed to store chemicals properly (did not have a formal system for waste storage)</li> </ul>

Prepare for earthquakes with anchored and lipped shelving	<ul style="list-style-type: none"> <li>This did not apply to the inspected stores. Inspected stores stored waste in closed and secure bags or totes that would limit their spillage or mixing during an earthquake</li> </ul>
Separate incompatible chemicals using secondary containment, store dry chemicals above liquids, and keep flammables in approved cabinets	<ul style="list-style-type: none"> <li>35 stores already separated incompatibles</li> <li>12 stores did not separate incompatibles or have a system in place to do so</li> <li>6 stores did not have any hazardous wastes that were incompatible with each other (ex: all toxic)</li> <li>4 stores were asked to make a small change (separate container for batteries, add additional totes, use consistent hazard descriptions to make it easier for staff, provide a separate container for oxidizers)</li> </ul>
Use containers that have tight fitting lids, no defects, are compatible with their contents, and that are kept closed except when adding waste	<ul style="list-style-type: none"> <li>41 stores already had proper containers</li> <li>2 stores did not have liquid waste</li> <li>14 stores were suggested to get proper containers to store waste when it is generated</li> </ul>
Label all hazardous wastes appropriately	<ul style="list-style-type: none"> <li>36 stores already labeled their waste appropriately</li> <li>17 stores did not have any labels</li> <li>4 stores were asked to make small changes (either increase font size of labels and/or clearly state the hazards of the waste)</li> </ul>
Inspect accumulation area routinely and keep inspection log	<ul style="list-style-type: none"> <li>37 stores already kept inspection logs</li> <li>3 stores already did inspections but did not keep a formal log</li> <li>17 stores were recommended to make routine inspections and keep an inspection log</li> </ul>
Locate all drains (inside and out), identify where they drain to, plug or seal indoor drains within hazardous waste storage areas	<ul style="list-style-type: none"> <li>53 stores either already knew where their drains drained to or did not have any drains</li> <li>4 stores were asked to confirm where their drains discharged to (assistance was given if requested)</li> </ul>
Designate all waste	<ul style="list-style-type: none"> <li>35 stores were already designating all of their waste. In corporate based systems, it was not always clear what designation process was being used, and we assessed based on what was in their storage area (specifically for federal versus state-only designation)</li> <li>10 stores were not designating any of their waste</li> <li>2 stores needed to confirm that they were using WA state only designation and not just federal or CA state designation</li> <li>8 stores were managing empty containers inappropriately as hazardous wastes</li> <li>1 store needed to analyze their oil/water sludge, aqueous parts washer, and lead/acid battery cleaner waste</li> <li>1 store was managing water-based paints as hazardous waste instead of drying them out</li> </ul>
Monitor and understand generator status, report when necessary	<ul style="list-style-type: none"> <li>57 stores understood their generator status by the time the inspection was complete and we had explained everything to them. It is not always clear who monitors this, a lot of fingers are pointed (it's the store, it's the vendor, it's corporate)</li> </ul>
Maintain documentation of waste designation, hazardous waste generation, disposal, and recycling activities	<ul style="list-style-type: none"> <li>45 stores maintained documentation of disposal</li> <li>10 stores did not, and were requested that they did (mostly stores without formal systems)</li> </ul>
Recycle wastes when possible using authorized facility	<ul style="list-style-type: none"> <li>50 stores were already using an appropriate vendor (or said that they would go to HazoHouse from now on)</li> </ul>

	<ul style="list-style-type: none"> <li>• 2 stores were doing a good job, but were also trying to find a new donation program to limit their generator status</li> <li>• 5 stores had no vendor identified</li> </ul>
Separate Universal Wastes and manage appropriately	<ul style="list-style-type: none"> <li>• 50 stores were already managing UW appropriately</li> <li>• 7 stores were managing UW but did not have appropriate labels (accumulation start date)</li> </ul>
Separate electronic wastes and recycle appropriately: businesses should use free E-Cycle program	<ul style="list-style-type: none"> <li>• 56 stores already separated their electronic waste or used a reverse distribution system within their corporate to recycle and replace electronics</li> <li>• 1 store was asked to look into recycling their electronics</li> </ul>
Remove excess accumulation of wastes	<ul style="list-style-type: none"> <li>• No stores visited appeared to have too much accumulated waste on site</li> </ul>
If needed, appropriately use and maintain a catch basin and oil/water separator by routinely inspecting, cleaning, and testing it	<ul style="list-style-type: none"> <li>• 52 stores did not have an oil/water separator</li> <li>• 5 stores had an oil/water separator</li> </ul>
Substitute toxic chemicals with less-toxic products	<ul style="list-style-type: none"> <li>• This BMP was not useful to this campaign, since most hazardous waste was being sold, and not being used</li> </ul>
Dumpster is protected from the rain, clean, and does not contain any hazardous waste	<ul style="list-style-type: none"> <li>• All stores had an appropriate dumpster. We did not inspect any dumpster contents, as this was an assistance visit and not a compliance inspection</li> </ul>
Auto Repair/Pump Station (8 total)	
Use less toxic chemicals or alternatives when possible	<ul style="list-style-type: none"> <li>• No changes suggested</li> </ul>
Use engineering controls to transfer liquids	<ul style="list-style-type: none"> <li>• 8 stores already used engineering controls</li> </ul>
Use dry absorbent cleaning methods first, then wash with water and collect rinse water when appropriate	<ul style="list-style-type: none"> <li>• 8 stores already used appropriate cleaning methods</li> </ul>
If necessary, appropriately use and maintain a catch basin and oil/water separator	<ul style="list-style-type: none"> <li>• 3 stores already used an oil/water separator</li> <li>• 3 stores did not have an oil/water separator</li> <li>• 1 store was told not to discharge soapy waste through the separator</li> <li>• 1 store needed to designate their sludge to confirm that it was not hazardous</li> </ul>
Recycle when possible	<ul style="list-style-type: none"> <li>• 6 stores already recycled</li> <li>• 2 stores should recycle their empty containers and not treat them as hazardous waste</li> </ul>
Use recyclable shop towels	<ul style="list-style-type: none"> <li>• 5 stores already used recyclable shop towels</li> <li>• 3 stores should look into recyclable shop towels</li> </ul>
Photo Development – Wet (2 stores)	
Increase digital technology	<ul style="list-style-type: none"> <li>• 2 stores did not use digital technology. We suggested they look into it, but they indicated that they had a strong customer base that came to them because they were one of the few stores that didn't use digital printing. Stores that used digital printing were not included in this section</li> </ul>
Use and manage a silver recovery system appropriately	<ul style="list-style-type: none"> <li>• 2 stores already managed a silver recovery system appropriately</li> </ul>
Have adequate ventilation in the lab area	<ul style="list-style-type: none"> <li>• 2 stores had adequate ventilation in their lab</li> </ul>
Use less toxic chemicals when possible	<ul style="list-style-type: none"> <li>• 2 stores already were using less toxic chemicals</li> </ul>

Unprocessed film – send to silver recycler	<ul style="list-style-type: none"> <li>• 2 stores did not dispose of unprocessed film</li> </ul>
Processed film – recycle or solid waste	<ul style="list-style-type: none"> <li>• 2 stores did not dispose of processed film</li> </ul>
Used developer – sewer	<ul style="list-style-type: none"> <li>• 2 stores already properly disposed of developer</li> </ul>
Fixer/bleach-fixers/bleach/stabilizer/wash – treat or send off site	<ul style="list-style-type: none"> <li>• 2 stores already properly disposed of these chemicals</li> </ul>
Filters/cleaning waste – send off site	<ul style="list-style-type: none"> <li>• 2 stores already properly disposed of their filters and cleaning wastes</li> </ul>
Inks – solidify	<ul style="list-style-type: none"> <li>• 2 stores already solidified their inks</li> </ul>
Pharmacy (22 stores)	
Use IEP and/or the CE	<ul style="list-style-type: none"> <li>• 15 stores did not appear to need to limit the amount of waste they produced</li> <li>• 7 stores were recommended to look into these options due to their concerns about the amount of p-listed material produced</li> </ul>
Designation protocol	<ul style="list-style-type: none"> <li>• 19 stores already had a good designation protocol</li> <li>• 2 stores already had a good designation protocol but were given information about the definition of ‘empty’ containers to limit waste amount</li> <li>• 1 store needed to create a designation protocol</li> </ul>
Limit accumulation	<ul style="list-style-type: none"> <li>• All stores did not accumulate too much waste</li> </ul>
Store properly	<ul style="list-style-type: none"> <li>• All stores were storing waste properly</li> </ul>
Spill kit and PPE	<ul style="list-style-type: none"> <li>• All stores had spill kit materials in their pharmacy</li> </ul>
Inspect accumulation area regularly	<ul style="list-style-type: none"> <li>• All stores inspected their accumulation areas regularly</li> </ul>
Train staff	<ul style="list-style-type: none"> <li>• 21 stores trained their staff</li> <li>• 1 store was asked to start training staff</li> </ul>
Dispose properly	<ul style="list-style-type: none"> <li>• 19 stores already stored waste properly</li> <li>• 1 store was asked to confirm that their vendor picked up all of their medical waste and that none of it was going into solid waste</li> <li>• 2 stores were required to start disposing of any waste that was not going back through reverse distribution properly</li> </ul>
Manage empty p-listed waste appropriately	<ul style="list-style-type: none"> <li>• 21 stores already managed their p-listed waste appropriately</li> <li>• 1 was asked to confirm that this was happening</li> </ul>
Use reverse distribution	<ul style="list-style-type: none"> <li>• All stores were using some amount of reverse distribution to manage their wastes</li> </ul>
Keep records	<ul style="list-style-type: none"> <li>• 21 were keeping records</li> <li>• 1 store was not keeping records</li> </ul>
Use inventory controls to limit extra waste	<ul style="list-style-type: none"> <li>• 18 stores were already using good inventory controls</li> <li>• 2 stores were asked to pay closer attention to the 2.2 pound limit of p-listed waste</li> <li>• 2 stores were asked to look into ways to limit nicotine expiring on shelf</li> </ul>
Manage sharps appropriately	<ul style="list-style-type: none"> <li>• All stores managed sharps appropriately either through a mail back program or their vendor</li> </ul>
Provide customers with disposal options	<ul style="list-style-type: none"> <li>• All stores were provided with handouts explaining where their customers could dispose of their pharmaceutical wastes properly</li> </ul>

## APPENDIX III: STORE LIST

Store Name	Site Status	Location
Albertsons	Completed	705 Trosper Road SW
Bailey's IGA	Completed	10333 Highway 12 SW
Bed Bath and Beyond	Not able to set up site visit	2405 4th Ave W
Best Buy	Completed	625 Black Lake Boulevard SW
Best Buy	Completed	1240 Marvin Road NE
Big 5 Sporting Goods	Completed	909 Cooper Point Road SW
Big 5 Sporting Goods	Completed	1351 Galaxy Way NE
Big Lots	Completed	1515 Marvin Road NE
Big Lots	Completed	2815 Capital Mall Drive SW
Cabela's	Completed	1600 Gateway Blvd NE
Cash and Carry	Completed	1010 Fones Road SE
Costco	Completed	5500 Littlerock Road SW
Costco	Completed	1470 Marvin Road NE
Dollar Tree	Completed	2104 Harrison Ave NW
Dollar Tree	Not able to set up site visit	606 Sleater Kinney Rd SE
Dollar Tree	Not able to set up site visit	1321 Marvin Rd NE
Dollar Tree	Not able to set up site visit	906 E Yelm Ave
Eastside Urban Farm and Garden Center	Completed	2326 4th Ave E
Fred Meyers	Completed	700 Sleater Kinney Road SE
Fred Meyers	Completed	555 Trosper Road SW
Grocery Outlet	Completed	8221 Martin Way E
Grocery Outlet	Completed	2100 Harrison Avenue NW
Haggen's	Completed	1313 Cooper Point Road SW
Haggen's Food and Pharmacy	Completed	3520 Pacific Ave SE
Harbor Freight	Completed	4520 Lacey Blvd SE
Harbor Wholesale Grocery Headquarters	Completed	3901 Hogum Bay Road NE
Hardel Builders Center	Not able to set up site visit	2321 Harrison Ave NW
Hobby Lobby	Completed	4141 Martin Way E
Home Depot	Completed	1450 Marvin Road NE
Home Depot	Completed	1325 Fones Road SE
Home Depot	Completed	1101 Kingswood Drive SW
Home Depot Distribution Center	Completed	9303 Orion Drive NE
Jo-Ann Fabric & Craft	Completed	2725 Harrison Ave NW
Lincoln Creek Lumber - Ace Hardware	Completed	2421 93rd Ave SW
Lowes	Completed	4230 Martin Way E
Lowes	Completed	5610 Corporate Center Lane SE
Michaels	None to limited Hazardous Waste	701 Sleater Kinney Road SE
Olympia Ace Hardware	Completed	400 Cooper Point Road SW
Olympia Food Co-op	None to limited Hazardous Waste	3111 Pacific Ave SE
Olympia Food Co-op	None to limited Hazardous Waste	921 Rogers St NW
Olympia Supply & True Value Hardware	Completed	625 Columbia St SW
Quality Food Center	Not able to set up site visit	4775 Whitman Lane SE
REI	Completed	625 Black Lake Blvd SW
Rite Aid	DOE Lead – not visited	651 Sleater Kinney Road SE
Rite Aid	DOE Lead – not visited	305 Cooper Point Road NW

Store Name	Site Status	Location
Rite Aid	DOE Lead – not visited	8230 Martin Way E
Rite Aid	Completed	4776 Whitman Lane SE
Rite Aid	Completed	909 E Yelm Ave
Safeway	Completed	1243 Marvin Road NE
Safeway	Completed	520 Cleveland Ave SE
Safeway	Completed	3215 Harrison Ave NW
Safeway	Completed	4700 Yelm Hwy SE
Safeway	Completed	4280 Martin Way E
Safeway	Completed	1109 Yelm Ave E
Safeway	Completed	6200 Pacific Ave SE
Sears	Not able to set up site visit	651 Sleater Kinney Road SE
Shopko	Completed	5500 Martin Way E
Southgate Ace Hardware	Not able to set up site visit	5203 Capitol Blvd SW
Sports Authority	None to limited Hazardous Waste	1220 Marvin Road NE
Sports Authority	None to limited Hazardous Waste	1200 Cooper Point Road SW
Sunbird True Value	Completed	1000 Algiers Dr
Tacoma Screw Products	Completed	6700 Martin Way E
Target	DOE Lead – not visited	2925 Harrison Ave NW
Target	DOE Lead – not visited	651 Sleater Kinney Rd SE
Target Distribution Center	Completed	3500 Hawks Prairie Rd NE
Thriftway, Bayview	Completed	516 4th Ave W
Thriftway, Ralph's	Completed	1908 4th Ave E
Tractor Supply Store	Completed	10616 Bald Hill Rd SE
Tractor Supply Store	Not able to set up site visit	4141 Martin Way E
Trader Joe's	None to limited Hazardous Waste	1530 Black Lake Blvd SW
Trader Joe's Distribution Center	Completed	3707 Hogum Bay Road NE
Walgreens	Not able to set up site visit	8333 Martin Way E
Walgreens	Completed	4540 Lacey Blvd SE
Walgreens	Completed	1510 Cooper Point Road SW
Walgreens	Completed	702 Trosper Road SW
Wal-Mart	DOE Lead – not visited	5900 Littlerock Road SW
Wal-Mart	DOE Lead – not visited	1401 Galaxy Drive NE
Wal-Mart	DOE Lead – not visited	17100 State Route 507 SE
Walmart Neighborhood Market	Completed	5110 Yelm Highway SE
West Marine	Completed	1530 Black Lake Blvd SW
Winco	Completed	7540 Martin Way E