

Chapter 11

Moderate Risk

Waste Plan

Introduction

The first Moderate Risk Waste Management Plan for Clark County was developed in 1988 in response to RCW 70.105.220, requiring all local governments to implement moderate risk waste (MRW) plans. Moderate risk waste has been specifically defined by RCW 70.105.010 (17) to mean:

- Any waste that exhibits any of the properties of hazardous waste but is exempt from regulation under RCW 70.105, solely because the waste is generated in quantities below the threshold for regulation.
- Any household wastes that are generated from the disposal of substances identified by the department as hazardous household substances.

The plan focused on the need to remove these moderate risk wastes from traditional solid waste handling and disposal streams. The original plan was prepared for both Clark County and Skamania County and was adopted on December 14, 1988. The Moderate Risk Waste Management Plan was amended in May 1991, July 1992, September 1992 and March 1994.

Moderate risk waste can be hazardous to human health, wildlife, or the environment, but it is conditionally (or categorically) exempt from the State's Dangerous Waste Regulations, Chapter 173-303 WAC. Moderate risk waste includes hazardous (toxic, corrosive, flammable, and reactive) wastes generated by households (referred to as household hazardous waste or HHW) and by businesses which generate only limited quantities of hazardous waste (referred to as small quantity generators or SQGs). Common examples of MRW include paint, pesticides, solvents, antifreeze, cleaners, drain opener and hobby chemicals.

Since HHW and SQG hazardous wastes are conditionally exempt from the State's hazardous waste regulation, they are regulated as solid wastes, primarily by local governments. However, in order to qualify as a SQG, a business must first determine if it meets the State's Quantity Exclusion Limit or QEL. The QEL identifies a business' regulatory status by measuring the amount of hazardous waste a business generates. If the QEL for a SQG is met then a business is conditionally exempt from the State's hazardous waste regulations. The first MRW Plan designated the Southwest Washington Health District (now Clark County Public Health) as lead implementation agency. It was adopted by all jurisdictions within Clark and Skamania Counties and

by the Health District Board of Health; it was subsequently approved by the Washington Department of Ecology in 1989. As lead agency, the Health District had responsibility for coordination and implementation of all elements of the first MRW Plan with the exception of the operation of the household hazardous waste collection facilities until 1997. At that time, the MRW Plan was amended to have Clark and Skamania Counties each assume the roles of lead agency for their respective counties.

Moderate risk waste programs in Clark County have taken a variety of forms since the 1989 MRW Plan was implemented. Some activities have been combined with solid waste information programs, such as general waste management publications and handouts. Others have specifically targeted moderate risk waste from households and small quantity generators. Collection programs include collection events in 1990-1993, HHW fixed facility operation since 1993, mobile HHW collection since 1998, used oil collection drop-off centers since 1992, curbside collection of used oil throughout the urban service area since 1992, Home HHW collections for eligible seniors and residents with disabilities since 2000, computer and other e-waste collection opportunities since 2003, and controlled substance collections since 2003.

The overall goal of the 1989 MRW Plan was to reduce the amount of hazardous waste in the solid waste and wastewater treatment systems. This goal was to be accomplished by reducing the amount of HHW and SQG hazardous waste being improperly disposed. During the first few years of MRW program implementation, MRW programs focused on disposal of hazardous waste in the solid waste stream. Because of the County's reliance on ground water for drinking water, this focus has now evolved to address surface and ground water quality protection and non-point source pollution prevention.

Originally written as a 5-year regional plan, the MRW Plan was incorporated into the Comprehensive Solid Waste and Moderate Risk Waste Management Plan adopted in 2002 as Chapter 11, *Moderate Risk Waste Plan*. The *Moderate Risk Waste Chapter* was prepared according to the Guidelines for Development of Local Hazardous Waste Plans (Washington Department of Ecology #93-99) and will serve as the guiding MRW Plan until replaced or changed through the Comprehensive Solid Waste Management Plan update or amendment.

State law (RCW 70-105) requires that the County implement certain activities to meet the criteria of Local Hazardous Waste Plans. In order for the County to be in compliance with State law, these activities will continue to be implemented before and after the study. These activities are: managing generated MRW (including an assessment of quantities, types, generators and fate of HHW and MRW); ongoing public involvement and public education (including potential hazards to health and environment; proper methods of handling, reducing, recycling, and disposal; an inventory of existing generators and identification of hazardous waste management facilities).

Plan Goals and Objectives

The intent of the Plan is to establish the foundation for the proper management of solid and moderate risk wastes in Clark County, both now and in the future. The Plan incorporates the following guiding or philosophical principles:

- A commitment to sustainability that ensures resources and options for future generations;
- Balance among public convenience, public expenses, public health and the environment;
- Flexibility to anticipate future changes and needs;
- Commitment to waste reduction and recycling;
- Increased local control of solid waste management;
- Integrity of waste stream measurement and monitoring;
- Encouragement of cooperative and coordinated efforts among government agencies, citizens and the private sector for managing solid wastes.

Waste Prevention and Reduction Goals

Established with this Plan Update, the overall objectives of the regional solid waste management system is:

- Reduce the amount of materials generated and landfill disposal from Clark County and its cities;
- Increase the recycling rate to 50 percent; and
- Reduce toxicity.

To achieve these objectives, the following targets have been established:

- Increase recovery of basic recycling by 50,000 tons by 2011; person/day
- Recover an additional 10,000 tons of organics by 2011;
- Recover an additional 10,000 tons of construction and demolition materials by 2011;
- Recover an additional 500 tons of hazardous waste materials by 2011; and
- Reduce per person per day waste generated by 5% by 2011. A 5% reduction of 7.4 lbs./person/day to 7.0 lbs./person/day.

Success may be measured by conducting surveys to evaluate changes in behavior and conducting waste stream analyses to track reductions in toxicity. Please note that waste prevention requires individuals, businesses and governments to change purchasing and use habits - basic changes in the way people live their lives. It requires repeated waste prevention messages to create such changes in what people buy and use.

Additional discussion of waste prevention goals and measurement is contained in the *Waste Monitoring and Performance Measurement*, Chapter 15.

Plan Development and Adoption Process

The Solid Waste Advisory Commission (SWAC) used the following evaluation criteria to determine if a recommendation should be implemented:

- A commitment to sustainability that ensures resources and options for future generations
- Balance among public convenience, public expenses, public health, and the environment.

Recommendations should look at solid waste management practices in the context of attempting to balance cost and convenience with natural resource conservation and environmental health values.

- Flexibility to anticipate future changes and needs.

Recommendations should support long term goals and allow for changing circumstances.

- Commitment to waste prevention, reduction and recycling.

Recommendations should support the prevention and reduction of toxicity and solid waste as well as encourage recycling and other waste diversion opportunities.

- Increased local control of solid waste management.

Solid waste services should be regulated by the level of government as close to the citizens as appropriate. The County and Cities should have the management tools to achieve the goals of the Plan while fostering competition among service providers.

- Integrity of waste stream measurement and monitoring.

Recommendations should allow the County to measure, compare and report our past and present efforts in a way that allows us to plan for the future and evaluate the effectiveness of our programs and the resources that we devote to them.

- Encouragement of cooperative and coordinated efforts among government agencies, citizens, and the private sector for managing solid wastes.

The County should maintain its commitment to collaborative management of solid waste by informing and involving citizens, other agencies, and the private sector.

The *Moderate Risk Waste Plan* has been updated as chapter 11 in this Solid Waste Management Plan. A Determination of Non-significance has been issued with this Plan. The Determination of Non-significance and the State Environmental Policy Act (SEPA) Environmental Checklist for this Plan are in Appendix A. This Checklist evaluates the environmental impacts associated with implementing the programs or the non-site-specific aspects of programs and facilities in the Plan.

The current process for this update involved an internal review by staff of the chapters with recommended language changes. Updates include changes in the solid waste system and recommended changes or additions/deletions to alternatives. This

language was reviewed by the cities and town. SWAC reviewed each chapter along with staff. This included a status review of Plan recommendations and any suggested changes. Analysis and discussion will occurred during the regular monthly SWAC meetings. SWAC reviewed and recommended the Preliminary Draft Plan.

This Preliminary Draft Plan was submitted to the Washington Department of Ecology for review and comment and to the Washington Utilities and Transportation Commission (WUTC) for evaluation for collection ratemaking purposes. On the basis of the comments received from the Washington Department of Ecology and the WUTC, revisions were made to the Plan. The Plan was reviewed and adopted in public meetings by the participating cities in accordance with the Interlocal Agreements with those jurisdictions. The Plan was adopted by the Clark County Board of Commissioners in a public hearing. Appendix C details the process and meeting dates for updating the Plan.

Assessment of Conditions

Clark County

Clark County through its Solid Waste Program, a section of the Public Works Department, has the long term moderate risk waste planning and facility development responsibility within the County. Through this authority, the County provides regional coordination, regional services, services to cities and other agencies, and local services in the unincorporated areas of the county. In addition to preparing and updating the Moderate Risk Waste Plan, the county contracts for household hazardous waste collection and disposal, promotes waste reduction, provides a variety of educational efforts throughout the county, and contracts for residential recycling collection which includes used motor oil, antifreeze and household batteries.

The Clark County Public Health is the designated enforcement agency for solid waste regulations in Clark County. Public Health administers the state's permit system for solid waste facilities, such as landfills, transfer stations and recycling facilities, and enforces the State's Solid Waste Handling Standards, including handling of municipal and industrial sludges and petroleum-contaminated soils. Public Health enforces County code for regulations on solid waste, hazardous waste, and biomedical waste and responds to complaints regarding illegal dumping, burying and accumulations of waste on private property.

The Clark County Solid Waste Advisory Commission (SWAC) is a 9-member citizen advisory board to the Board of County Commissioners. Members represent the geographic areas of the county, the City of Vancouver, the small cities and towns, businesses, the solid waste industry and public interest groups. The SWAC provides and receives public input on solid waste plans, policies and ordinances and has a significant role in developing the Plan.

Waste Characterization Studies

Waste composition studies were conducted in 1993, 1995-1996, 1999-2000, 2003 and 2008 at the two in-county transfer stations. Information on the hazardous waste stream does not have the same level of statistical certainty due to the smaller quantities and greater variability of hazardous materials in the waste stream compared to non-hazardous materials. Although its relative percentage of the entire waste stream is

very small, there has been a noticeable decline over the last fifteen years in the occurrence of hazardous materials disposed for all three categories of residential generators.

**Table 11.1
Hazardous Waste Disposed in the Landfill (Tons)**

Generator Group	1993	1996	1999	2003	2007
Residential Single Family	531	313	393	178	320
Residential Multi-Family	370	83	193	232	10
Residential Self Haul	234	275	483	63	170
Commercial Self Haul	49	96	132	0	70
Commercial	452	480	322	802	260
TOTALS	1,636	1,247	1,523	1,275	830

* Does not include electronic wastes

Waste Monitoring and Performance Measurement

In order to improve programs, data must be accurately measured and used consistently. Targets are intended to measure progress towards the ends result. The County's has an objective to increase the recycling rate to 50 percent and the diversion rate to 65% by 2011. The diversion rate is the percentage of all waste generated by residents and businesses that is recycled and recovered (not made into new products). Waste recovery includes motor oil and hazardous wastes that are burned for fuel. A target has been set to recover an additional 500 tons of hazardous waste materials.

The amounts of hazardous wastes collected at fixed collection facilities and mobile collection events are in The *Solid Waste Data Report* in Appendix J, listed by year, collection site, hazard class, material type and disposal option. All hazardous wastes amounts that are recovered and included in the diversion rate are also in Appendix J.

Household Hazardous Collection Waste Programs

Computer Reuse/Recycling Collection Program (CREAM)

In 2002, Clark County Solid Waste, Clark County Sheriff's Office, City of Vancouver Solid Waste, Clark College, Salvation Army, and Columbia Resource Company developed CREAM, a computer (and other electronics) reuse/recycling program to protect the environment by diverting computers from landfills to sound, economically viable, reuse, and recycling applications. Computers and other electronics can be dropped off at the Clark County Jail Work Center, the Central Transfer Station, West Van Recovery Center, Philip Services Corporation and at mobile collection events. In 2005, there were 12 refurbished computer units distributed to eligible recipients within Clark County and in 2006 and 2007, this grew to 50 units per year.

The Washington Department of Ecology adopted WAC 173-900 in 2006 requiring computer and television manufacturers to provide consumer-convenient recycling of their covered electronic products (CEPs) throughout the state. Covered electronic

products, or CEPs, are computers, televisions, computer monitors, and portable or laptop computers used by households, small governments, small businesses, and charities. Manufacturers must make electronic product recycling services available at no cost to these groups by January 1, 2009. On October 5, 2007 the Washington Department of Ecology adopted amendments to WAC 173-900 and to WAC 173-303 Dangerous Waste Regulations. These rules impact the sale and recycling of CEPs in Washington State. CREAM may need to make some modifications to its program as these changes are implemented.

In February 2009, the Federal Communications Commission has determined that the broadcast television industry must convert from analog to digital transmissions. To be able to receive a transmission, analog televisions will need to either “hook up” to cable or satellite TV or be “fitted” with a converter. There will be an increase in the number of old television sets that are disposed. There is uncertainty as to the level of this impact. CREAM should continue to accept televisions for recycling. The Washington electronic law will also help to reduce the financial impacts of this conversion.

Curbside Collection of HHW

Clark County has collected waste oil at the curbside since 1992; in 2003, the collection of used antifreeze and household batteries was added to the curbside recycling program.

Home collection Program

In 2001 Clark County signed an agreement with Curbside Incorporated to establish a pilot program for the collection and transportation of household hazardous waste from eligible seniors and residents with disabilities. In 2002, the pilot program was combined with the HHW Mobile Collection Program and a contract signed with Philip Services Corporation.

Household and Public Education

Brochures and other publications about managing household hazardous waste have been distributed to Clark County residents since 1990. Household hazardous waste educational presentations have been offered to Clark County residents since 1992. In the schools, presentations have been made to students from third grade through college level. Information is also distributed through the Columbia Springs Environmental Education Center (CSEEC), which has incorporated household hazardous waste information into its volunteer and public education programs. Local residents have also been educated about household hazardous waste through portable displays, available since 1992, and through presentations at community events including the City of Vancouver’s “Recyclingist Neighborhood” trainings. Storm drain stenciling equipment has been made available to students, neighborhood associations, scout groups and other community groups since the MRW program was implemented. For more information about hazardous waste education see Chapter 5 *Education and Promotion*.

Naturally Beautiful Backyards Program

The Naturally Beautiful Backyards Program, located at CSEEC provides adult-based education on natural gardening techniques. This is a volunteer-based program with

volunteers drawn from the WSU Master Gardener Program and the Clark County Master Composter/Recycler Program.

School Assembly Presentations

County staff help develop assemblies on waste reduction, recycling, and/or hazardous waste upon request and in coordination with our Save Organic Scraps program. The assembly presentations include: environmental storytelling, Mother Natures Garden puppet show, and Gracie Learns the 3 R's puppet show. A third puppet show is being introduced in 2009.

Paint Take Back Program

In 2004, Clark County Solid Waste established a Paint Take Back Program for residents to recycle unused and unwanted paint and paint-related products free of charge at two local paint stores: Miller Paint Company, 2607 N.E. Andresen Road, Vancouver and Rodda Paint & Décor Center, 7723 N.E. Fourth Plain Boulevard, Vancouver. In 2006 a third collection site, Salmon Creek Miller Paint 13712 NE 20th Avenue was added. The collected latex paints are recycled and the oil base paints and paint products are reused as an alternative fuel.

Medication Take Back Program

The disposal of unwanted medications by placing them in the garbage or flushing them down the toilet can pose a threat to human health and the environment. In 2003, Clark County Solid Waste with the support of the Washington State Pharmacy Board developed a Medications Take Back Program for controlled and non-controlled substances.

Non-controlled medications have been collected at participating pharmacies, the HHW fixed facilities and HHW mobile collection events; controlled substances are collected in partnership with Clark County Sheriff's Department at the Sheriff's Office West Precinct, 505 NW 179th Street and the Central Precinct, 11608 NE 149th Street. Other collection locations for controlled substances have been added.

In 2005 Clark County Solid Waste and the Clark County Sheriff's Department were honored with the Innovation Program Award by the North America Hazardous Materials Management Association in recognition of the County's Controlled Substance Collection Program.

Mobile Collection Events

Four collection events were held prior to the opening of the fixed HHW collection facilities in 1993. In 1998 there were 6 mobile collection events scheduled; in 2005 there were 14 events scheduled. These events educate on the need to properly dispose of HHW and provide collection opportunities for some more rural areas of the County.

Permanent Collection Sites

Two fixed household hazardous waste collection facilities opened in 1993 in Clark County; Central Transfer and Recycling opened in January, West Van Materials Recovery Center opened in March. Both facilities are owned by Columbia Resource

Company (CRC) and operated under contract to Clark County and both are currently being upgraded. Both are open to the public two days per week and accept up to 220 pounds or 25 gallons of household hazardous waste per visit at no charge. In 2001 Clark County entered into a contract with Philip Services Corporation (PSC) to collect household hazardous waste at the PSC facility located at 625 S. 32nd Street in Washougal. This collection site is open to the public the first Tuesday of each month and it also accepts up to 220 pounds or 25 gallons of household hazardous waste per visit at no charge.

Re-Refined Oil

Clark County continually promotes the purchase of re-refined motor oil and developed a purchasing preference for all types of recycled products, including motor oil. All county vehicles now use re-refined oil, at a rate of about 600 gallons per year. Two automotive shops in the community currently market re-refined oil for retail sales and for use in on-site oil changes.

Used Oil Drop Off Collections

Clark County residents can drop off residential “Do-It-Yourselfers” used motor oil at various sites, including private businesses (such as G.I. Joe’s and Schuck’s Auto Supply); the two transfer stations in Vancouver; county-sponsored drop-off stations in Yacolt, Hazel Dell and Vancouver; and Philip Services Corporation in Washougal.

Used Oil Ordinance

An ordinance requiring point-of-purchase signs and reusable oil containers at oil retailers was completed in 1994 when the Board of Health adopted Ordinance 94-01, the Used Oil Recycling and Disposal Ordinance. The ordinance establishes fines for the improper disposal of used oil and requires retailers to post oil-recycling information and provide reusable containers.

Residential Waste Prevention

Clark County implemented its first residential waste prevention promotion and education campaign in 1991-1992, with the financial and technical support of the Washington Department of Ecology. They have continued to provide local governments, including Clark County, with grants to help promote waste prevention and recycling. These grants require local matching funds. The current grant program is referred to as the “Coordinated Prevention Grant Program.” Waste prevention programs and campaigns that address household hazardous waste and moderate risk waste include:

- Mother Nature’s Garden, a puppet show that teaches the value of compost and gardening without chemicals has been presented to primary grade students throughout Clark County;
- Waste reduction displays are presented at the Clark County Fair and the Home and Garden Idea Fair along with other regional fairs and festivals,
- Interactive displays were developed on the topics of Waste Reduction, Natural Gardening, Stormwater, Transportation and Wastewater Treatment;

- The Naturally Beautiful Backyards program provides information on working in the yard and garden without using chemicals that could be harmful to people, animals and the world around them. This is done through brochures, lectures, community workshops and informational displays;
- Curbside recycling collection was expanded to include used oil, anti-freeze, and household batteries;
- Unwanted electronics waste including computers, monitors, TV's, printers, answering machines, VCR's, typewriters, FAX machines, cell phones and other computer related electronics may be dropped off at the jail work center through a partnership with the CREAM Program. Details about this program can be found in the Household Hazardous Waste chapter;
- Collection programs for sharps (needles, syringes, & lancets), old and/or unwanted medications and mercury thermometers;
- In 1999, the County and Portland Metro signed an agreement to have Metro process all latex paint received in Clark County in Metro's new latex paint recycling facility. The recycling costs are significantly less than household hazardous waste disposal;
- The County continues to provide technical assistance consultations for businesses to improve their waste reduction, recycling and sustainable practices.
- The County web site hosts <http://RecyclingA-Z.clark.wa.gov>, which is an on-line directory with a detail listing of where to take unwanted items.

Other Public Information

A wide variety of educational media and outreach approaches have been used in Clark County to ensure ongoing education to support moderate risk waste programs and toxics reduction. The following are some examples of these education and promotion efforts.

Recycling Directory

The County, in conjunction with the cities, produces and updates a "*Recycling Directory*" which contains extensive information on opportunities for waste reduction, reuse and recycling in Clark County. Information addresses all types of household hazardous waste and moderate risk waste. The directory lists resources for curbside collection services, drop-off sites, business recycling collection services and educational and local government contracts. Copies of the "*Recycling Directory*" are distributed at community events, including the Clark County Fair, as well as through community centers and local retailers. It is also available on the web at <http://www.clark.wa.gov/recycle/documents/Publications/DirectoryforWeb.pdf>.

Brown Pages

A section of the telephone directory has been dedicated to waste reduction and recycling information so that citizens can access this information available at all times.

Web Site

The Clark County Solid Waste Program website has been updated and can answer questions about household hazardous waste and moderate risk waste. Program brochures are also available on-line. <http://www.clark.wa.gov/recycle/index.html>.

Events and Promotion

County and city staff and its partners participate in community events and promotion efforts such as Earth Day, Clark Public Utilities Home and Garden Idea Fair, Sturgeon Festival, Watershed Festival, Clark County Fair, America Recycles Day, and Recycled Arts Festival. Information on our moderate risk waste programs and toxics reduction are provided at these events.

SMALL QUANTITY GENERATORS

Generators

Of the approximately 10,000 commercial properties and 16,000 businesses in Clark County (2005 estimates), it is possible that over one-third produce some quantities of hazardous wastes. Approximately 30 of these businesses are listed by the state as large quantity generators, 30 as medium quantity generators and 90 as small quantity generators.

Large quantity generators (LQG) produce over 2,200 pounds of hazardous waste per month and/or more than 2.2 pounds of extremely hazardous waste per month; they are regulated under the Hazardous Waste Management Act (HWMA) and Resource Conservation and Recovery Act (RCRA).

Medium quantity generators (MQG) produce 220 to 2,200 pounds of hazardous waste per month and less than 2.2 pounds of extremely hazardous waste per month; they are also regulated under HWMA and RCRA.

Small quantity generators produce less than 220 pounds per month and accumulate less than 2,200 pounds of hazardous waste at any time and generate less than 2.2 pounds of extremely hazardous waste per month; they are not regulated by HWMA when they meet the regulatory conditions of exemption.

According to the Washington Department of Ecology records there are about 647 businesses in Clark County that have obtained EPA/state hazardous waste generator identification numbers as of 2008. Compilations of the annual reports show that the businesses include fully-regulated hazardous waste generators, conditionally-exempt SQGs, as well as some entities who were a one-time hazardous waste generator or who report having produced no hazardous waste during the previous year. Some non-regulated businesses obtained their identification number in order to contract with a hazardous waste transportation/disposal company. A list of the business with EPA identification numbers can be found at the following web site:

<https://fortress.wa.gov/ecy/facilitysitesearch/AdvancedSearch.aspx>

Information is only available regarding hazardous waste collected through SQG collection events or disposed of at solid waste facilities (disposal information

regarding solid waste facilities is based on waste characterization data). Survey data is available from several sources outside of Clark County. Information about the other management methods is not available or is very limited.

Small Quantity Generator Collection Assistance

SQG hazardous waste is currently collected at Philip Services Corporation Facility in Washougal, Washington and through a variety of private hazardous collection and disposal contractors.

Information about the treatment, recycling and disposal of SQG hazardous wastes that were collected by private hazardous waste service providers is not available.

Small Quantity Generator Education

Small Quantity Generator business technical assistance activities are directed at minimizing the use of products that produce hazardous waste and encouraging proper management of hazardous wastes when they are generated. Business technical assistance programs have been offered in Clark County since 1990. Services are provided through various means to SQGs throughout the County, and some programs have been developed to target specific types or categories of businesses. For more information about hazardous waste education see Chapter 5 *Waste Education and Promotion*.

Industry Fact Sheets

Industry-specific fact sheets, describing waste minimization measures and proper disposal methods, were developed by the Washington Department of Ecology and distributed by Clark County staff to businesses involved in commercial pesticide application, metal fabrication, wood furniture making and many other industries.

Local Interagency Networking Cooperative (LINC)

LINC is an informal information network and task force comprised of agencies and jurisdictions within Clark County. LINC is committed to providing a more effective and efficient means to protect the environment and human health through the coordination of both regulatory and non-regulatory agencies.

Since 2001, workshops on chemicals in schools, dental wastes, oily wastes, paint/spray booth operations, chemicals in school labs, floor/storm drains, SEPA, and mobile home demolition/removal have been offered by LINC.

Re-Refined Motor Oil

Several Clark County agencies received information on the benefits of using re-refined motor oil. As of 2005, the County, Clark County Public Health, Northwest Natural, C-Tran, and the Vancouver School District fleet vehicles had all converted to using re-refined motor oil.

SQG Handbook

A comprehensive SQG handbook, including a hazardous waste management services directory, was initially developed for the region in 1991; in 2004, it was updated and added to the County Solid Waste web page.

Small Quantity Generator Technical Assistance Visits

County staff conducts Technical Assistance Visits (TAVs) to provide information to businesses that will help them apply new technologies, comply with the dangerous waste regulations, and conduct their activities in a manner that protects human health and the environment. TAVs are provided by various methods, including site visits, workshops, industry-specific assistance and publications; TAVs are non-regulatory in nature and are available free to all businesses in Clark County.

Effective TAVs depend on understanding what motivates businesses to manage waste responsibly and proactively reduce them when possible. This is accomplished through interaction and discussion between hazardous waste generators and County staff. Technical assistance activities help hazardous waste generators:

- Interpret and comply with dangerous waste regulations;
- Prepare and implement pollution prevention plans;
- Comply with reporting requirements;
- Reduce, recycle and properly manage their hazardous wastes and materials; and,
- Understand the basic requirements of Water Quality and Air Pollution regulations.

Compliance and Enforcement

Compliance Education

During implementation of the 1989 MRW Plan, emphasis was given to expanding collection opportunities as well as providing education and technical assistance to businesses in the County to improve moderate risk waste management. Education is the primary means of obtaining compliance; enforcement action is used only in the event of serious or imminent threats to public health or the environment or in cases of repeated offenses. Education and/or enforcement are conducted during complaint investigations or on-site visits to businesses. Since Clark County has no regulatory authority over dangerous wastes, cases requiring enforcement action are referred to the Washington Department of Ecology or other appropriate regulatory agencies; used oil disposal violations are enforced by Clark County Public Health (formerly known as the Southwest Washington Health District SWWHD).

Compliance Workshops

Dangerous Waste compliance workshops have been held annually by the Washington Department of Ecology since 1992. The purpose of the workshops is to provide assistance and information about hazardous waste regulations and disposal and management requirements. They can be beneficial to businesses wishing to retain or obtain SQG status.

Enforcement Regulation

Enforcement Regulation No. 96-01, adopted by Clark County Public Health in 1996, (currently Title 32 ENFORCEMENT of the Clark County Code) is a revised ordinance that applies to moderate risk waste enforcement activities. It provides enhanced enforcement capabilities for staff by establishing fines for the violations of public health regulations. Clark County Public Health adoption of the regulation allowed the development of a "Notice and Order" to assist with enforcement and to help discourage illegal disposal of moderate risk waste.

Regulations governing Solid Waste Handling Operations and Moderate Risk Waste Fixed Facilities

The County's moderate risk waste fixed facilities and operators are subject to the State's Solid Waste Handling Standards, WAC 173-350, which are enforced by local Public Health agencies, through a solid waste handling facility permit system. Facility siting is regulated by both State siting standards and county or city land use ordinances, which may require conditional use permits for solid waste facilities. Disposal facilities are subject to additional regulations, including long term monitoring (WAC 173-350 & 351). The state solid waste regulations that the Washington Department of Ecology enforces result from state legislation, RCW 70.95, and federal laws, such as the Resource Conservation and Recovery Act (RCRA), the Clean Water Act, the Clean Air Act and others.

Household hazardous waste fixed facilities and mobile collection events are required contractually to comply with all applicable federal, state, county, regional and local laws, statutes, rules, regulations and ordinances. Household hazardous waste fixed facilities and mobile collection events are directly regulated by Clark County Public Health with oversight by the Washington State Department of Ecology.

Regulations governing waste generators

Public Health enforces County regulations on infectious waste and moderate risk hazardous wastes (including waste oil) and other special wastes; and responds to complaints regarding illegal dumping, burying and accumulations of waste on private property. Current County (24.12.060) and cities' code allows for burial of wastes, which were generated on site. This includes solid waste resulting from residential or agricultural activities as well as non-putrescible commercial or industrial waste. On site burial of regulated waste such as hazardous waste, toxic waste, bio-medical waste, and certain types of special waste are prohibited. The ability to bury certain solid waste on site results in problems such as health and sanitation problems, contamination of soils and/or water, attraction of vectors, settling of land into depressions, discovery of unwanted buried and subsequent removal of wastes by new property owners. This plan recommends that the on site burial of solid waste be regulated and discouraged.

Program Funding

The County Solid Waste Fund is an enterprise fund. All solid waste revenues remain in the fund and no property tax fund dollars are used for solid waste programs. The revenue sources for the County solid waste fund include: County Administrative Fees paid under the disposal and collection contracts; state grants; sale of recyclable materials; and interest earned on the fund. A significant portion of the MRW program is funded through state grants. The County solid waste fund received revenue from the Washington Department of Ecology's Coordinated Prevention Grants (CPG) program. This grant program is funded through the Local Toxics Control Account. To receive grant funding, MRW programs must be in compliance with the Moderate Risk Waste Plan. The CPG program funds are allocated every two years, based on a county allotment and a per capita allotment. Counties must submit satisfactory applications that meet eligibility requirements and priorities identified in their approved solid and moderate risk waste plans. In addition, local governments must provide matching funds.

Coordination with Other Local Plans

This plan is being developed to separately interact with other plans and reports that are already in effect or being developed. This includes:

Washington State Solid Waste Management Plan

Washington State, through the Department of Ecology, is required under RCW 70.95 to develop and maintain a long-range plan for the management of solid wastes. The focus of the *Beyond Waste Plan* is on reducing wastes and toxic substances in Washington. Two of the initiatives directly relate to toxic substances:

- Significantly reduce most wastes and the use of toxic substances in Washington's industries.
- Significantly reduce small-volume hazardous wastes from businesses and households.

Clark County Solid Waste Management Plan

The Moderate Risk Waste Plan has been incorporated as a chapter in the Clark County Solid Waste Management Plan.

Comprehensive Growth Management Plan

The Clark County Comprehensive Growth Management Plan was updated in 2007. This plan establishes the framework for how Clark County land should be used in the future, including areas designated for urban development and areas identified and designated for rural and natural resource preservation.

Disaster Contingency Planning

Clark County Public Health, Clark County Solid Waste and Clark Regional Emergency Services Agency have worked together to prepare response plans in the event of a disaster. Disaster contingency planning for businesses has also been conducted.

Other Conditions

Federally Listed Sites

In accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Environmental Protection Agency (EPA) maintains a database of potential or known hazardous waste sites. These sites are listed as priorities for response, based on their potential threat to public health or the environment. Superfund site response may be under the authority of EPA, the Washington Department of Ecology or shared.

As of the most recent update, November, 2005, there were 65 final, 12 deleted and one proposed site in Washington State. In Clark County there were 7 final sites listed with 3 deletions, the remaining active sites on the National Priorities Lists sites are:

Boomsnub/Airco, Vancouver; Frontier Hard Chrome, Inc., Vancouver; Vancouver Water Station #1, Clark County; Vancouver Water Station #4, Clark County. Current lists and information on the CERCLA sites, listed by EPA are available from the Region 10 office of EPA, 1200 Sixth Avenue, Seattle Washington, 98101. The National Priorities List of Superfund sites may be found at

<http://www.epa.gov/superfund/sites/locate/index.htm>

State Listed Sites

The Washington Department of Ecology's Toxics Cleanup Program has prepared and regularly updates its "Confirmed and Suspected Contaminated Sites List." For each site, the report notes the status of site assessment or cleanup, whether or not groundwater, surface water, soil or sediment is contaminated or suspected of contamination and the types of contaminants suspected or confirmed.

As of November 2005 there were 104 listed Confirmed and Suspected Contaminated Sites in Clark County. For general questions or to receive the report in another form, contact the Washington Department of Ecology at 1-800-826-7716. The "Confirmed and Suspected Contaminated Sites List" may also be reviewed or downloaded from the internet at <http://www.ecy.wa.gov/programs/tcp/cscs/CSCSpag.htm>.

Transfer, Storage, or Disposal Facility

As of July 2006 there was one hazardous waste transfer, storage, or disposal facility (Bonneville Power Administration Ross Complex Federal Storage Facility, 5411 NE Hwy 99, Vancouver, WA 98663) and one used oil facility (Emerald Recycling – Vancouver Commercial Used Oil Processing Facility 1300 West 12th Street Vancouver WA 98660) with EPA/state ID numbers in Clark County. A complete list of Active Hazardous Waste and Used Oil Facilities in Washington State can be found at www.ecy.wa.gov/programs/hwtr/hwfacilities/pages/activefac.html

Zone Designations

The State's Hazardous Waste Management Act (HWMA) distinguishes between two categories of hazardous waste management facilities and the process for siting these facilities. The Washington Department of Ecology is required to site "preempted facilities," that is, those sites with particular state-regulated hazardous waste management activities. These activities include landfilling, incineration, land

treatment, surface impoundment and the use of waste piles. Local governments are required to establish land use zones or geographic areas for siting “designated zone facilities,” such as hazardous waste recycling, storage and treatment facilities. These local zoning requirements must be consistent with the state’s hazardous waste facility siting criteria and must allow hazardous waste processing or handling where hazardous substances (such as raw materials) are processed or handled. Local governments are not required under the HWMA to develop land-use zones for siting designated zone facilities if they can show that, within their jurisdictions (1) no regulated amounts of hazardous waste were generated over the previous two years, and (2) no geographic area meets the states siting criteria. Designated land-use zones or geographic areas, as well as requests for exemption from the zoning requirements, must be approved by the Washington Department of Ecology. They have the authority to establish zones for hazardous waste facilities or preempt local authority in communities that do not have approved land-use zones or geographic areas. All jurisdictions in Clark County have submitted a certificate of compliance verifying the amended zoning language.

Recommendations

1. The County should continue to support the following current programs and activities:
 - Developing Information/Educational Materials
 - Providing Workshops and Presentations
 - Conducting Technical Assistance Visits
 - Participate in the Local Interagency Network Cooperative (LINC)
 - MRW Collections (curbside collections, home collections, mobile collection events, and at permanent collection facilities)
 - Review technical information regarding current or newly identified hazardous materials
2. The County should also:
 - Add other collection sites (cities of Camas and Vancouver) for controlled substances
 - Through the CRC contract, plan, construct, and operate a permanent HHW collection facility at the Washougal Transfer Station
 - Prohibit the disposal of all moderate risk waste through the municipal solid waste collection and disposal system as an incentive to reduce waste at the source or to separate it from garbage for collection at a hazardous waste collection facility. In Clark County, household hazardous wastes, such as oil-based paint and other wood finishing products, pesticides, corrosive cleaners, automobile batteries and motor oil are already prohibited from disposal at the transfer stations by CRC.
 - Evaluate how the CREAM program will be impacted by the change in state law and make recommendations for program changes.

- Enhance education to businesses so that all businesses have reduced their use of hazardous or toxic materials.
- Continue contracting or partnering with the service providers, non-governmental agencies and organizations to develop and/or implement some of the technical assistance, information, education and promotion activities; Continue to support and fund the teacher trainings and workshops, Master Composter/Recycler, and the Naturally Beautiful Backyards programs as resources to promote waste and toxics reduction, recycling activities and proper management of solid wastes.

MODERATE RISK WASTE PLAN RECOMMENDATIONS DETAILS

Recommendation	Element	Implementation Date	Implemented By	On Going Annual Costs
1. The County should continue to support the following current programs and activities:				
Developing Information/Educational Materials	• Household and Public Education	• On going	Clark County	\$10,000
Providing Workshops and Presentations	• Household and Public Education	• On going	Clark County	\$2,000
Conducting Technical Assistance Visits	• Small Business Technical Assistance	• On going	Clark County	\$25,000
Participate in the Local Interagency Network Cooperative (LINC)	• Small Business Collection Assistance • Enforcement	• On going	Clark County	\$2,000
MRW Collections (curbside collections, home collections, mobile collection events, and at permanent collection facilities)	• HHW Collection	• On going	Clark County	\$250,000
Review technical information regarding current or newly identified hazardous materials	• Small Business Technical Assistance • Household and Public Education	• On going	Clark County	\$2,000
2. The County should also:				
Add other collection sites (cities of Camas and Vancouver) for controlled substances	• HHW Collection	2008	Clark County	\$3,500
Through the CRC contract, plan, construct, and operate a permanent HHW collection facility at the Washougal Transfer Station	• HHW Collection	2009	Clark County	\$2,000
Prohibit the disposal of all moderate risk waste through the municipal solid waste collection and disposal system as an incentive to reduce waste at the source or to separate it from garbage for collection at a hazardous waste collection facility. In Clark County, household hazardous wastes, such as oil-based paint and other wood finishing products, pesticides, corrosive cleaners,	• Enforcement • Household and Public Education • Small Business Technical Assistance	2009	Clark County	\$80,000

MODERATE RISK WASTE PLAN RECOMMENDATIONS DETAILS

Recommendation	Element	Implementation Date	Implemented By	On Going Annual Costs
automobile batteries and motor oil are already prohibited from disposal at the transfer stations by CRC.				
Evaluate how the CREAM program will be impacted by the change in state law and make recommendations for program changes.	<ul style="list-style-type: none"> • HHW Collection • Household and Public Education 	2008-09	Clark County	\$5,000
Enhance education to businesses so that all businesses have reduced their use of hazardous or toxic materials	<ul style="list-style-type: none"> • Business Technical Assistance • Business Education 	2009-10	Clark County	\$5,000
Continue contracting or partnering with the service providers, non-governmental agencies and organizations to develop and/or implement some of the technical assistance, information, education and promotion activities; Continue to support and fund the teacher trainings and workshops, Master Composter/Recycler, and the Naturally Beautiful Backyards programs as resources to promote waste and toxics reduction, recycling activities and proper management of solid wastes.	<ul style="list-style-type: none"> • Household and Public Education • Small Business Technical Assistance 	2009-10	Clark County	\$200,300