

**MEMO**  
**Department of Ecology**

February 19, 2003

TO:           Persons Interested in Household Hazardous Waste

FROM:        Hazardous Waste Toxics Reduction

SUBJECT:     Household Hazardous Waste From Non-profits Accepting Charitable Donations

“Whose waste is it?” and “how should it be disposed?” were the primary questions raised at the February 6, 2003, meeting to discuss Household Hazardous Waste at Ecology’s Bellevue Office. King County Solid Waste, King County Water and Land Resources, Envirotech Systems, Inc., The Salvation Army, Goodwill Industries, and Ecology personnel were present.

WAC 173-303-071(3) defines household waste including household waste that has been collected, transported, stored, or disposed, as follows:

“Household wastes” means any waste material (including garbage, trash, and sanitary wastes in septic tanks) derived from households (including single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds, and day-use recreation areas).

The Washington definition is based on the Federal definition and is virtually identical.

The problem

Household hazardous waste may appear overnight at any one of 26 Goodwill Industries drop boxes and facilities, 10 Salvation Army stores or to a lesser degree, two Union Gospel Missions, four St. Vincent de Paul locations, and at Community Theaters. Goodwill Industries and The Salvation Army want to continue to be good neighbors by collecting the household products to keep them from entering the environment. They gather whatever is found and steward them to central locations such as their main stores.

Ecology’s position

In March 1993, Ann Kenny, Moderate Risk Waste Coordinator for NWRO, Ecology, Bellevue wrote to King County Solid Waste: “With regard to charitable organizations who discover hazardous wastes buried in loads of donations, in the absence of evidence that they are business wastes, they would be considered household hazardous waste. The assumption is that the charitable organization receives donations primarily from households.”

“On the other hand, when charitable or non-profit organizations accept hazardous products from households for use by the organization, any wastes resulting from such use would be subject to designation and management as dangerous waste unless the organization meets the definition of a household.” Ms. Kenny continues, “The above clarifications, however, are not meant to place any requirement upon local government to accept these sources of HHW into their HHW collection programs.”

Ecology feels that materials collected by charities and accumulated at central locations can reasonably be assumed to be HHW. There will be exceptions, but on the whole households are depositing the materials that become a problem when they are abandoned. This position has been recently corroborated by Ecology’s Solid Waste Program MRW Specialist Dave Nightingale.

Unless there is an imminent risk to human health or an environmental threat, Ecology will not respond to collect abandoned materials. All attendees at the February 6, 2003 meeting are in mutual agreement that material will continue to be abandoned at charitable donation sites.

#### The current situation

The questions remain: who will dispose of these materials and who will pay for this disposal?

One question that needs to be reviewed is how local governmental agencies view acceptability of these wastes for delivery to their HHW collection facilities. Historically, they have viewed wastes coming from a business as a business wastes, regardless of its origin. The generator determination of these collected wastes shall be discussed by King County Solid Waste officials.

Charity spokesmen have said they want to assist the City of Seattle and King County with the control and disposal of the materials that come into their possession. They could call the city, county, or local fire department to report these materials left unattended and request they be removed. Noting the number of facilities represented by Goodwill Industries, Salvation Army, Union Gospel Mission, St. Vincent de Paul, and others, it can be demonstrated that an enormous amount of time and equipment could be devoted on a daily basis to capturing all of the abandoned materials from the sites represented. Is there a middle ground to share the resource demands for control and disposal that these materials require? By the same token, is local government in a position to demonstrate any flexibility in its right to accept or deny HHW sources into their HHW collection program?

In conclusion, several things need to be addressed by the charities and the City of Seattle and King County (hereafter referred to as concerned parties).

- Charities should have common training to educate the public where to take their HHW for free disposal.
- Charities should educate the public that their collection sites are not accepting HHW via site signage and security.

- Charitable organization personnel need to be trained regarding the risks associated with HHW and given procedures to prevent accidental releases and injuries.
- Collected HHW must be controlled and segregated to avoid fire, spill, or release to the environment.
- HHW must not be accumulated over long periods of time to prevent excessive accumulation. HHW is not regulated but could become so when improperly managed.
- Concerned parties should establish material control requirements. A waste reduction plan should be developed and implemented in concert with local governmental agencies. Materials that can be reused “as is” should be identified and segregated from wastes, thus minimizing costs of disposal. This will affect transport costs, handling, temporary accumulation, and turn in to HHW receiving stations.
- Concerned parties need to determine disposal pricing and procedures.

As long as residents want to maintain their homes through cleaning or painting, HHW will continue to be generated. The current situation results from the failure of individuals to take advantage of publicly-sponsored collection sites and events. This can only be improved when charities that accidentally come into possession of abandoned materials coordinate with the city and county to insure abandoned materials are properly managed and disposed.

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