

MARSHALL UNIVERSITY

HAZARDOUS WASTE DISPOSAL SECTION

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Marshall University Hazardous Waste Program

POLICY STATEMENT- Hazardous Materials Management; Hazardous Waste Disposal

Effective dates:

Revised: New

Review Date:

Responsible Office:

Environmental Safety and Health Office

Regulatory Authority: West Virginia Department of Environmental Protection and 40 CFR Part 26 1-265

Policy:

Marshall University has enacted the Hazardous Waste Disposal Program to establish and provide guidelines to ensure that Marshall University is in compliance with federal, state, and local requirements regarding hazardous waste disposal.

Discussion:

Waste disposal activities shall be evaluated for potential hazardous components prior to disposal. The Environmental Health and Safety Office will maintain a list of hazardous waste generators and assist them with waste classification. All parties that designate waste as hazardous shall follow the requirements of this policy.

Deans, Directors and /or designated persons will be responsible for the implementation of this policy and ensure faculty, staff, students and visitors adhere to its requirements.

If a question arises concerning the contents of this policy, refer to the enclosed standards, or contact the Environmental Safety and Health Office.

Approved: _____

Dean or Director of Department

Date

Marshall University
Hazardous Materials Management

Section 2
Hazardous Waste Disposal - Reference Procedure

1.0 Purpose

The purpose of this program is to ensure that Marshall University (MU) is in compliance with federal, state, and local regulations pertaining to the handling and disposal of hazardous wastes.

It is the policy of Marshall University (MU) to protect all faculty, staff, students, and visitors from any hazardous exposure to hazardous waste. No employee shall engage in or be required to perform any task involving hazardous waste unless they have been properly trained and are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facilities operations and emergencies.

Acting as the representative of the Marshall University President, the Environmental Safety and Health Office has prime responsibility for overseeing the program. The Environmental Health and Safety Office will act as program manager.

2.0 Scope

The purpose of the Hazardous Waste Management Program is to ensure that proper handling and legal disposal of hazardous wastes is conducted at all Marshall University facilities.

All requirements of the Marshall University Hazardous Waste Management Program will apply to the following:

1. Any liquid, semi-solid, solid or gaseous substance defined as hazardous waste.
2. Waste which consists of or contains a hazardous material.
3. A waste mixture formed by mixing any waste or substance with a hazardous waste.
4. A hazardous sludge, residue, concentrate, or ash originating from a hazardous waste.

5. Hazardous material disposed of to land, accidentally discharged onto land or accidentally spilled onto land.
6. Radioactive materials that emit ionizing radiation.

The hazardous chemical waste disposal program at Marshall University is able to remove and dispose of all the above mentioned types of hazardous chemicals with the EXCEPTION of radioactive waste. The Office of Radiation Safety is responsible for the control, use, and disposal of all radioactive material on Marshall University campuses.

3.0 Definitions

Acutely Hazardous Waste - Those specific wastes identified in 40 CFR 261.3 (e).

Container - Any Portable device, in which a material is stored, transported, treated, disposed of, or otherwise handled.

Conditionally Exempt Small Quantity Generator – Generates no more than 100 kg of hazardous waste, 1 kg of acutely hazardous waste, or 100 kg of contaminated waste from an acutely hazardous waste spill in a month. Accumulates no more than 1,000 kg of hazardous waste at any time.

Disposal - The discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste may enter the environment or be emitted into the air or discharged into any waters.

EPA Identification Number - Number assigned by the Environmental Protection Agency to each generator; transporter; and processing, storage or disposal facility.

Generator - Any person by site, whose act or process producer hazardous waste identified or listed in 40 CFR 261.

Handling - The transportation from one place to another, loading, unloading, pumping or packaging of waste.

Hazardous Waste Manifest - A hazardous waste manifest form is to accompany shipments of hazardous waste as defined by 49 CFR

Hazardous Waste - Hazardous Waste as defined in 40 CFR 261 subpart C & D or Toxicity Characteristic Leaching Procedure (TCLP) as defined in Part 261.

Incompatible Waste - A hazardous waste which is unsuitable for (1) placement in a particular device or facility because it may cause corrosion or decay of containment materials or (2) commingling with another waste or material under uncontrolled conditions because commingling might produce heat or pressure, fire or explosion, violent reaction, toxic dust, mist, fumes, or gases.

Satellite Collection Station - A hazardous waste collection station at or near any point of generation where wastes initially accumulate under the control of the operator of the process generating the waste. Satellite collection stations must comply with the requirements specified under 40 CFR 264.34 (c).

Small Quantity Generator (SQG) - A generator who generates between 100 and 1,000 kg of hazardous waste and no more than 1 kg of acutely hazardous waste in one month.

Solid Waste - Solid waste as defined in 40 CFR 261.2.

Treatment - Any method, technique, or process, including, neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recover, amenable for storage, or reduced in volume.

Waste Stream - A waste material generated either one time or routinely at a single generating facility with physical characteristics and chemical composition that do not vary significantly from shipment to shipment.

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4.0 Responsibilities

4.1 Environmental Safety and Health Office:

- 4.1.1 Develop, implement and maintain the Hazardous Waste Management Program in compliance with federal, state, and local requirements applicable to the "Small Quantity Generator".
- 4.1.2 Assist departments in complying with the program by providing them with hazardous waste consultation.
- 4.1.3 Identification of hazardous waste generators on campus.
- 4.1.4 Hazardous waste segregation.
- 4.1.5 Hazardous waste pick up.
- 4.1.6. Assist departments with the redistribution of usable materials.
- 4.1.7 Periodically audits facility for Hazardous Waste Management Compliance.
- 4.1.8 Recordkeeping.
- 4.1.9 Annual Reporting.
- 4.1.10 Biennial Reporting.

The Environmental Safety and Health Office is located in room 209 of the Sorrell Maintenance Building, phone 696-2993. In an emergency call 696-6680 or Marshall University Police Department at 696-4357. The Radiation Safety Office can be reached by calling 969-2751

4.2 Marshall University Safety Committee:

Provide support for the Hazardous Waste Management Program in conjunction with individual building unit safety committees.

4.3 Generator:

- 4.3.1 Develop procedures to ensure effective compliance with the Hazardous Waste Program.
- 4.3.2 Provide Environmental Safety and Health Office with notification prior to implementing changes that reduce or increase waste streams.
- 4.3.3 Ensure that all appropriate personnel strictly adhere to the Hazardous Waste Management Program.
- 4.3.4 Ensure that employees working with hazardous waste are fully trained and aware of the hazards of exposure and comply with procedures for control.
- 4.3.5 Comply with Federal mandates that require hazardous waste minimization.

4.4 Employee:

Although no single set of safety procedures can guarantee accident free employment or place of employment; and, because of the number of potential hazards that may exist or be created in the work environment, employees must first use common sense and good judgment at all times. Each employee assigned to work with hazardous waste shall comply with hazardous waste procedures, whether written or oral, while performing assigned duties.

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Standard Operating Procedures

Regulatory Authority: West Virginia Department of Environmental Protection
Series XV--Chapter 20, Article 5E of the code of West
Virginia-(47 CSR 35); 40 CFR Part 261--265; 29 CFR
1019.120 - Hazardous Waste Operations; Marshall
University - Spill Policy

Hazardous Waste Standard Operating Procedure:

To implement the Marshall University Environmental Health and Safety's procedures for properly managing and disposing of hazardous waste in accordance with Environmental Health and Safety's Hazardous Materials Management Program.

Exclusions from the Hazardous Waste Standard Operation Procedure include work involving hazardous and radioactive mixed waste management; and biohazard and mixed hazardous waste management.

1. PROCEDURE:

a. General.

1. The Environmental Safety and Health Office shall conduct all assigned hazardous waste management and disposal activities in accordance with all applicable Federal, State regulation, local laws and Marshall University Policies.
2. The Environmental Safety and Health Office shall maintain a list of hazardous waste generators for Marshall University.
3. All Environmental Safety and Health's hazardous material staff shall be trained in accordance with the requirements specified in 40 CFR 265.16.

b. Generators.

The Environmental Safety and Health Office shall insure that:

Generators of hazardous waste shall adhere to these procedures. The initial determination of hazardous waste is with the generators. Each Department/ Chair/Chemical Hygiene Officer/Generator is responsible for submission of the Hazardous Waste Form to be forwarded to Environmental Safety and Health Office for proper disposal.

Generators are responsible for properly managing hazardous materials until collection for pickup.

(Please refer to Prudent Practices for Handling and Storage of Hazardous Chemical in Laboratories National Academy Press 1981 for guidelines.)

1. Use of Containers.

Storage of the hazardous chemicals at the generation point may be in their original containers until disposal. These containers must remain intact and not permit any leaks or spills. Only compatible materials shall be placed in the storage containers.

2. If the original container is no longer intact, the unused chemical can be transferred to another container and properly labeled. Caution must be taken by the generators when transferring flammable materials insuring that proper bonding and / or grounding techniques are followed where applicable.
3. Generators must label the container with the following:
“Chemical Name and Percentage” as stated on the Safety and Health’s Hazardous Waste Disposal Form.
4. Hazardous waste generators are responsible for properly containing, storing and segregating the waste at the point of generation. If there is any question regarding whether a waste or chemical is hazardous, it shall be treated as hazardous until a determination is made by the Environmental Safety and Health Office.
5. The Environmental Safety and Health Office will provide assistance in identifying the appropriate container and proper storage requirements.
6. Containers must be suitable for onsite transportation and interim storage at the designated building/storage areas chosen by the Dean/Chair/ Department/Chemical Hygiene Officer.
7. Containers that hold hazardous chemicals must be closed during storage except when adding or removing hazardous chemicals.
8. All other potentially hazardous materials (contaminated clothing, rags, etc.) must be placed in a plastic bag and securely closed. The plastic bag will be considered containing hazardous waste and handled accordingly.

c. Waste Determination for Routine Waste.

The final waste determination is made by the Environmental Safety and Health Office based upon routine or non-routine waste characteristics or waste type.

The Hazardous Waste Form is reviewed for the following:

Recycling, containerization, chemical compatibility, staging and/or storage, and hazardous waste disposal.

d. Hazardous Waste Storage Areas.

Check with the Environmental Safety and Health Office for the approved hazardous chemical storage areas. The personnel directly responsible for the facility must complete classroom or on-the-job training which will allow them to perform their duties in a way that ensures the facility’s compliance with the environmental and safety regulations and with the “Chemical Hygiene Plan” for your designated project or operation.

Hazardous Waste storage facilities will be equipped with the following: A telephone capable of summoning emergency assistance, portable fire extinguishers or comparable methods of fire control such as fire suppression system, and spill control equipment.

The "Site of Generation" is defined as the laboratory (room) generating the chemical waste. If the chemical waste is removed and consolidated, it is not considered a "Site of Generation." The waste must then be placed in hazardous waste facility where the hazardous waste vendor will dispose of the waste during the next pick-up.

The Environmental Safety and Health Office will insure that the Dean/Director/Chair/Chemical Hygiene Officer or the Building Manager does the following:

1. Place the hazardous chemicals within storage areas. Each storage area is then segregated by compatible waste.
2. Only place compatible chemicals near each other within this storage area.
3. A log of chemicals (including amounts) will be maintained at all times within this storage facility.
4. The facility will be maintained and operated to minimize the possibility of a fire, explosion or any release of hazardous chemicals into the air, water or soil.
5. A copy of the Marshall University Spill Policy will be posted in a visible location at the outside of the storage facility.
6. Inspections of the hazardous waste storage facility will be done **weekly** to assure that the above requirements are met. The inspector must sign and date the inspection form.
7. There will be a record of **weekly facility inspections** maintained for review. Environmental Safety and Health Office will keep a copy of the inspections on file.
8. The Environmental Safety and Health Office will insure that any hazardous chemicals picked up for disposal by the hazardous waste vendor matches the "Hazardous Waste Chemical Disposal Form."

e. Hazardous Waste Removal.

The Environmental Safety and Health Office shall insure the following:

1. Schedule hazardous waste removal with the approved vendor. This will be on a set schedule not to exceed five (5) month intervals.
2. Schedule specialized waste removal with the approved vendor if needed to remove poisons, shock sensitive materials, cylinders or other regulated waste not listed during the regularly scheduled waste removals.
3. The Environmental Safety and Health Office will ensure that someone is on-site during the approved waste vendor's removal days to insure packaging, manifesting and removal is in accordance with the Federal guidelines.

4. The Environmental Safety and Health Office shall sign and retain a copy of the manifest immediately before the hazardous waste is transported from Marshall University owned properties and keep on file indefinitely.
5. The Environmental Safety and Health Office shall retain a copy of the hazardous waste manifest upon arrival at the approved TSDF and keep manifest copy on file indefinitely.
6. The Environmental Safety and Health Office shall retain a copy of the ultimate disposal form from the incinerator and keep disposal copy on file indefinitely.