



EPA UPDATE ON HAZARDOUS CHEMICAL WASTE DISPOSAL



Recent EPA enforcement initiatives directed at colleges and universities have resulted in significant fines and penalties in EPA Regions I, II, and III. Fines have ranged from \$500,000 to in excess of \$2 million. In a recent inspection at the University of Michigan, eleven investigators spent 5 full days on the Michigan campus visiting labs and looking at records.

While much of a multi-media inspection centers on programs managed by the Department of Occupational Health and Safety, the inspections frequently have a special emphasis on the management of hazardous chemical wastes at the point of generation. It has been reported that inspectors have, in fact, visited most if not all of the laboratories on the campuses inspected. The largest fines have been levied against the institution's hazardous chemical waste management program.

What does this mean to research here on campus and what are the researcher's responsibilities?

Regulations are written in such a way that fines and penalties may be levied against an institution or the researcher, as the generator of hazardous waste. This has happened many times in the past and it is therefore extremely important to adhere to the policies established in the Chemical Safety and Waste Management Manual. Some things you should be aware of include:

- Be sure everyone in your area having responsibility for hazardous waste handling has been properly trained according to instructions in the manual and that training has been documented.
- Ensure that bottles or collection containers are in good condition and are compatible with the material being contained in them. Collection containers must be closed at all times unless you are adding waste.
- Keep waste types separated to the fullest extent possible. (e.g. do not mix solvent waste with metal waste unless it is an integral part of the experiment).
- Label the container with the contents of the waste as soon as waste is added. Be as specific as possible as to content and percentages of chemicals contained in waste. A label that says "organic waste or solvents" is not allowed
- Date the container when it is 90 to 95% full and do not overfill containers.
- Be sure and maintain all manifest records on past disposals to the waste facility and remember that waste that is corrosive, reactive, ignitable (flammable) or contains a toxic constituent such as lead, chromium, silver, chloroform, benzene is considered hazardous and must be manifested to the waste facility. If you are unsure if a material or mixture of chemicals is a hazardous waste please contact the Hazardous Materials Facility at 4-3797 or Chemical Safety at 4-2487
- Store waste in a secure location under strict control of laboratory staff. Keep waste away from high foot traffic.

Recent spot checks in buildings have indicated that improper labeling, open containers, and containers in poor condition are the more noted items that need attention. Remember that signs of spilled material at the base of containers are indications of a potential release to the environment in the eyes of a regulatory official. Should you have any other questions or need assistance please contact Chemical Safety at 4-2487. ***Thanks for your help at UAB.***

