Guidelines/Procedures

SUBJECT: ACC Hazardous Waste Management Program
Guideline/Procedure for ACC Management Safety Statement
AR#: 3.03.006
Date Effective:

PLACEHOLDER TABLE OF CONTENTS

These Table of Contents divisions will be set up on the EHS web site as hyperlinks to the specific sections of the

AUSTIN COMMUNITY COLLEGE
HAZARDOUS WASTE MANAGEMENT PROGRAM

I. Value

The purpose of this document is to inform faculty, staff, employees, and students at Austin Community College (ACC), regarding Federal and State hazardous waste disposal regulations and to define the ACC Hazardous Waste Management Program (Program). The Program pertains to hazardous waste and does not include procedures for the management of radioactive, infectious, and biological waste. The ACC Environmental Health Safety and Insurance Office (herein referred to as EHS & Insurance) administers the Hazardous Waste Management Program at ACC. Compliance with the program is critical and requires full cooperation by all College entities.

II. Hazardous Waste Management Regulations

The U. S. Environmental Protection Agency (EPA) administers the Resource Conservation and Recovery Act (RCRA). Under this Act, the EPA has the responsibility for regulating hazardous chemical wastes. RCRA established a "cradle to grave" hazardous waste management requirement to protect public health and the environment from improper disposal of hazardous waste. The law went into effect in November 1980. The Texas Commission on Environmental Quality (TCEQ) administers an equivalent to RCRA for the State of Texas under Industrial Solid Waste and Municipal Hazardous Waste Regulations of the Texas Administrative Code (TAC) (Title 30, Part I, Chapter 335). Appendix A provides definitions for commonly used RCRA words.

Any business or industrial facilities, including academic institutions that generate hazardous waste are required to comply with EPA and TCEQ hazardous waste regulations. These regulations, contained in Title 40 Code of Federal Regulations (CFR) Parts 260-279 and Title 30 TAC Chapter 335 respectively, can be very difficult to understand. The intent of the following guidelines are to provide basic assistance in identifying wastes, in determining if these wastes are considered hazardous and identifying techniques to safely and correctly manage and dispose of these wastes. It is vital that generators work closely with EHS and Insurance Office to establish compliant procedures for the individual areas that generator hazardous waste.

Since Federal and State regulations govern hazardous waste disposal at ACC, failure to comply with any hazardous waste regulation may result in substantial fines and penalties for the College; individual generators (e.g., principal investigators, employees) causing the violation may be

personally liable. It is ultimately the responsibility of the generator to determine whether their wastes are considered hazardous or not. EPA and TCEQ regulations stipulate that each individual who generates hazardous waste is personally liable and is responsible for assuring compliance with regulations and proper hazardous waste management. A waste generator never totally loses liability for environmental damage; therefore, the selection of a reliable disposal facility is very important. Violations may range from failure to properly label a container of hazardous waste to intentionally disposing of hazardous waste into the air, down the drain, or in the garbage**. In Texas, penalties for non-compliance may be civil, criminal, or administrative violations with penalties ranging from fines of up to $25,000 per day to a 15-year prison term for individuals.**

ACC has applied for and received an identification number from the EPA and a Texas solid waste registration number from the TCEQ identifying ACC as a hazardous waste generator, as defined by RCRA. Some ACC campuses generate between 100 and 1,000 kg of hazardous waste per month and are subject to regulations applicable to non-industrial Small Quantity Generators, including hazardous waste storage up to 180 days. ACC has made the decision to internally manage all campus locations' hazardous waste in compliance with the regulatory requirements for a Small Quantity Generator (SQG). This will enable the College to use one consistent set of guidelines for hazardous waste management.

III. Duties and Responsibilities

The ACC President is the College Official ultimately responsible for ACC's compliance with environmental health and safety regulations. In addition, responsibility and liability for the Hazardous Waste Management Program extends to the **ACC Board of Trustees**. The ACC College President and Board of Trustees shall show visible support for safety as a value at ACC, through funding and appropriate staffing in support of the Program.

The ACC Executive Team / Administrators are responsible for insuring implementation of the Hazardous Waste Management Program in their areas of responsibility, showing visible support for the program and for ensuring the health and safety of the College's employees and students.

The Dean, Unit Director, Department Chair will have ultimate responsibility for implementation and compliance with the ACC Hazardous Waste Management Program within their disciplines / areas / units. Various duties associated with this program may be delegated to personnel within the department/ unit. This designation of duties does not reduce ultimate responsibility of Unit Heads or Supervisory Personnel for compliance to the Program.

EHS & Insurance Office Duties as Administrator of the Hazardous Waste Management Program

The **EHS & Insurance Office** coordinates the Hazardous Waste Management Program for ACC and designated ACC facilities. Duties of the EHS & Insurance Office include:

1. Assist areas/units with the implementation of and compliance with this Program, including but not limited to, training, hazardous waste stream determinations and classifications, oversight of hazardous waste disposal, establishing/coordinating area compliance audits and assisting with corrective actions.

2. Provide annual and refresher hazardous waste training to all required personnel as defined by RCRA.

3. Compile and maintain a list of all the College's hazardous waste generators so that RCRA training can be documented.

4. Maintain manifest master file. Manifests are required to be maintained for a minimum of three years however, ACC will maintain them indefinitely.

5. Maintain liaison with the appropriate regulatory authorities (TCEQ, EPA, etc.).

   a) Submit required Notice of Registrations to the TCEQ when necessary.

   b) Submit annual waste summaries to the TCEQ for all facilities generating more than 220 pounds of hazardous waste in any one calendar month.

6. Ensure that a contract with a qualified, properly licensed hazardous waste disposal contractor is in place at all times. EHS and I Office will do, at a minimum, annual inspections of hazardous waste disposal contractors and associated facilities to ensure compliance with Federal and State regulations.

7. Coordinate a schedule with ACC's designated hazardous waste disposal contractor for hazardous waste pick-ups at all facilities and to be present for all pick ups. The EHS & Insurance Coordinator (or the EHS & Insurance Director as backup) will sign all manifests for all regulated waste shipments. The Department of Transportation regulates the transportation of hazardous waste and EHS and I will ensure that EHS and I personnel are trained and certified as required by D.O.T.

8. Coordinate with generators on each campus to prepare for the scheduled hazardous waste pick-ups.
9. Coordinate with ACC's designated environmental contractor whenever hazardous waste testing is needed at a facility.
10. Provide supportive technical consultation to ACC's hazardous waste generators.

IV. Hazardous Waste Management Program

A. Introduction

The Hazardous Waste Management Program for Austin Community College shall be administered by the EHS & Insurance Office, whose line of administrative authority is through the Vice President of Business Services. Generators are responsible for following the ACC disposal procedures, for ensuring that their employees are trained in proper disposal procedures, and for properly identifying the hazardous waste generated.

Each academic, vocational or support department including instructional laboratory facilities which produces hazardous waste in any way, must, also, ensure that personnel who generate hazardous waste have received documented training in the use of the ACC hazardous waste handling system and are complying with ACC procedures in regards to hazardous waste. The Dean / Director of each group has ultimate responsibility for insuring compliance.

A. Procedures

The following procedures are intended to assure compliance with applicable EPA and TCEQ regulations for the proper management of hazardous chemical waste and to reduce adverse effects to human health and the environment.

B. Hazardous Waste Training

RCRA requires that employees of SQGs who manage or handle hazardous waste be trained. Initial training must be provided prior to an employee participating in any hazardous waste related activities. Annual refresher training must be completed within 13 months of the previous training. Training will be approved / provided by the EHS & Insurance Office. This training shall include:

1. Overview of the both EPA and TCEQ regulations
2. Generators' responsibilities
3. Hazardous waste determination
4. Waste classification, labeling, segregation, and storage
5. Spill cleanup procedures
6. Disposal procedures

Although SQGs are not required to maintain training records, ACC has opted to do so. The EHS & Insurance Office will maintain a master file of all ACC employees' RCRA training records.

C. Hazardous Chemical Waste Determination

A material becomes "waste" when the individual generator determines that it is no longer useful and should be discarded. If the material is to be discarded, the EHS & Insurance Office **must** make a determination whether the waste is non-hazardous or hazardous for each waste stream generated by ACC. Because the primary source for waste determination is the generator's process knowledge, the EHS & Insurance Office utilizes a Chemical Inventory and Waste Stream Identification spreadsheet that the generator completes and returns to the EHS & Insurance Office within one day of a material being declared a waste. Certified Laboratories or licensed/certified waste vendors will perform chemical analyses to be used for the identification/characterization of unknown or improperly labeled wastes.

ALL WASTE STREAMS MUST BE CLASSIFIED AS HAZARDOUS OR NON-HAZARDOUS. CONTACT THE EHS & INSURANCE OFFICE CONCERNING NEW OR EXISTING WASTE STREAMS THAT ARE UNCLASSIFIED.

Personnel classifying waste streams must be RCRA certified through appropriate and current RCRA training as specified in 40CFR Parts 260-279. All RCRA training must be approved through the Director of EHS and I. A material is "non-hazardous waste" if it does not meet the definition of "hazardous waste". "Hazardous waste" is any waste that is defined as being hazardous in 40 CFR Section 261.3 and 30 TAC Chapter 335, rule 335.504. A material is "hazardous waste" if it meets one or more of the following:

1. It is a chemical listed on one of the Chemical Tables in Appendix B (that provides EPA's four hazardous waste lists with respective waste codes: "P", "U", "F" and "K")

   By definition, EPA determined that some specific wastes are hazardous. These wastes

are incorporated into lists published by the Agency. These lists are organized into three categories:

- **The F-list** (non-specific source wastes). This list identifies wastes from common manufacturing and industrial processes, such as solvents that have been used in cleaning or degreasing operations. Because the processes producing these wastes can occur in different sectors of industry, the F-listed wastes are known as wastes from non-specific sources. Wastes included on the F-list can be found in the regulations at 40 CFR §261.31 (click for hyperlink).

- **The K-list** (source-specific wastes). This list includes certain wastes from specific industries, such as petroleum refining or pesticide manufacturing. Certain sludges and wastewaters from treatment and production processes in these industries are examples of source-specific wastes. Wastes included on the K-list can be found in the regulations at 40 CFR §261.32 (click for hyperlink).

- **The P-list and the U-list** (discarded commercial chemical products). These lists include specific commercial chemical products in an unused form. Some pesticides and some pharmaceutical products become hazardous waste when discarded. Wastes included on the P- and U-lists can be found in the regulations at 40 CFR §261.33 (click for hyperlink).

2. It is a mixture or solution containing a listed chemical) and a non-hazardous chemical.
3. It meets the definition of one of the following for Characteristic Waste:

   Waste that does not meet any of the listings explained above may still be considered a hazardous waste if exhibits one of the four characteristics defined in 40 CFR Part 261 Subpart C — ignitability (D001), corrosivity (D002), reactivity (D003), and toxicity (D004 - D043).

a) Ignitability (flashpoint <60^{o} C (140^{o} F) or supports combustion

   1) **Ignitability** – Ignitable wastes can create fires under certain conditions, are spontaneously combustible, or have a flash point less than 60 °C (140 °F). Examples include waste oils and used solvents. For more details, see 40 CFR §261.21 (click for hyperlink). Test methods that may be used to determine ignitability include the Pensky-Martens Closed-Cup Method for Determining Ignitability (Method 1010a) (PDF,

1 pp., 19 KB), the Setaflash Closed-Cup Method for Determining Ignitability (Method 1020b) (PDF, 1 pp., 17 KB), and the Ignitability of Solids (Method 1030) (PDF, 13 pp., 116 KB).

(b) Corrosivity (pH ≤2 or≥12.5);

Corrosivity – Corrosive wastes are acids or bases (pH less than or equal to 2, or greater than or equal to 12.5) that are capable of corroding metal containers, such as storage tanks, drums, and barrels. Battery acid is an example. For more details, see 40 CFR §261.22 (click for hyperlink). The test method that may be used to determine corrosivity is the Corrosivity Towards Steel (Method 1110a) (PDF, 6 pp., 37 KB).

(c) Reactivity (e.g., responds violently to air or water, cyanides, explosives, unstable chemicals

Reactivity – Reactive wastes are unstable under "normal" conditions. They can cause explosions, toxic fumes, gases, or vapors when heated, compressed, or mixed with water. Examples include lithium-sulfur batteries and explosives. For more details, see 40 CFR §261.23 (click for hyperlink) There are currently no test methods available.

(d) Toxicity (e.g., pesticides, heavy metals, poisons);

Toxicity – Toxic wastes are harmful or fatal when ingested or absorbed (e.g., containing mercury, lead, etc.). When toxic wastes are land disposed, contaminated liquid may leach from the waste and pollute ground water. Toxicity is defined through a laboratory procedure called the Toxicity Characteristic Leaching Procedure (TCLP) (Method 1311) (PDF, 35 pp., 288 KB). The TCLP helps identify wastes likely to leach concentrations of contaminants that may be harmful to human health or the environment. For more details, see 40 CFR §261.24. (click for hyperlink)

4. It is a Universal Waste per 30 TAC 335.261; or
5. Material is not excluded from the regulations

It is critical that generators classify any waste they generate as either non-hazardous or hazardous

so that they will know how the proper disposal method. For example, it is illegal to dispose of **hazardous waste** in any of the following ways:

1. Disposal through the sanitary drain such as sink drain, floor drain or urinal or toilets.
2. Intentional evaporation in or outside a fume hood.
3. Disposal in the regular trash.
4. Disposal through storm drain, on paved surface or on the ground.

However, non-hazardous waste may be disposed using the sanitary sewer or regular trash, with prior approval of the EHS & Insurance Office. Additional information about non-hazardous waste disposal can be obtained below or from the EHS & Insurance Office.

D. Disposal of Non-hazardous Waste

An area must have documented approval from the EHS & Insurance Office stating that the waste is non-hazardous prior to disposal as a non-hazardous waste.

Not all chemical wastes are hazardous and so should not be entered into the ACC Hazardous Waste Management Program. The following guidelines for determining which non-hazardous wastes are suitable for disposal through normal waste channels were developed after careful review of TCEQ regulations.

No waste that is defined as hazardous by the TCEQ or EPA may be placed in the regular trash. "Regular trash" is referring to placing material into dumpsters outside of a building or any trash can inside a building. Custodial services will not pick up any type of chemical placed in trashcans inside a building.

Liquid waste (i.e., bottles of unused or partially used solutions) may never be disposed of in dumpsters because liquid wastes are not permitted at municipal landfills.

Empty containers of waste commercial products or chemicals are acceptable if:

- No freestanding liquids remain in the container and all disposal requirements noted on the label are complied with.
- Empty chemical containers should be placed in a dumpster for disposal with other non-hazardous trash when the following requirements are satisfied:

- EPA regulations stipulate that **an empty chemical container** must:

    1. Shall not contain **free** liquid or solid residue;
    2. Pesticide containers or containers which contained acutely hazardous materials must be triple rinsed and the rinse water collected for disposal as hazardous waste
    3. Have the label removed or defaced;
    4. Have the lid or cap removed; and
    5. Have a hole punched in the bottom (for metal or plastic containers).

Certain **solid, non-hazardous chemicals** are suitable for disposal in the sanitary landfills.) Solid, non-hazardous waste must be placed directly in the dumpsters outside the building and not into the trashcans inside a building.

The following types of solid waste, which are generally considered non-hazardous or of low toxicity can be put directly into dumpsters outside the building.

1. Organic chemicals:
    a. Sugars and starches
    b. Naturally occurring amino acids and salts
    c. Citric acid and its Na, K, Mg, Ca, NH_4 salts
    d. Lactic acid and it's Na, K, Mg, Ca, NH_4 salts

2. Inorganic chemicals:
    a. Sulfates: Na, K, Mg, Ca, Sr, NH_4
    b. Phosphates: Na, K, Mg, Ca, Sr, NH_4
    c. Carbonates: Na, K, Mg, Ca, Sr, NH_4
    d. Oxides: B, Na, Ca, Sr, Al, Si, Ti, Mn, Fe, Cu, Zn
    e. Chlorides: Na, K, Mg
    f. Borates: Na, K, Mg, Ca
    g. Fluorides: Ca

    Note: As noted above, liquid solutions of such wastes should not be put into the dumpsters. Contact the **EHS & Insurance Office** prior to sewer disposal of such liquid solutions.

3. Laboratory materials **not contaminated** with hazardous chemicals:
    a. Chromatographic absorbents
    b. Filter papers, filter aids, and glassware
    c. Rubber and plastic protective clothing

If there is any question as to whether a waste is acceptable for land filling, please contact the **EHS & Insurance Office**.

E. Determining Generator Status

There are three categories of hazardous waste generators:

- Conditionally Exempt Small Quantity Generator (CESQG);
- Small Quantity Generator (SQG); and
- Large Quantity Generator (LQG).

Typically, the more hazardous waste generated, the more stringent the regulations. The EHS & Insurance Office must know how much hazardous waste each ACC campus generates each month. This is necessary for three reasons:

1) to know what regulatory requirements apply to the campus;
2) to know the monthly amount when applying for the EPA identification number or when submitting modifications; and
3) to submit annual waste summary reports to the TCEQ.

In order for the EHS & Insurance Office to determine the generator category for each campus, each generating area on a campus must count (track) the amount of hazardous waste and acutely hazardous waste that is generated each calendar month. The total weight of hazardous waste for the month determines the generator category. One acceptable counting method is to use a hazardous waste tracking log. The generator may create a log sheet that should have at minimum the date, type of chemical waste and amount. To facilitate the counting of hazardous waste, the tracking log can be kept on a clipboard and hung near the Satellite Accumulation Area storage containers. At the end of each semester, each generating area should provide a copy of their tracking log to the EHS&I Coordinator (or sooner if requested by the EHS & Insurance Office). If a campus falls into different generator categories from month to month, the campus should choose the more stringent requirements to ensure compliance. This last statement should not occur, but if

it does, then EHS&I should make determination and ensure compliance.

F. Classification and Segregation of Hazardous Waste

Hazardous chemical waste is categorized into the following hazard classes:

1. Halogenated solvents
2. Non-halogenated solvents
3. Acids (inorganic or organic)
4. Bases (inorganic or organic)
5. Heavy metals (silver, cadmium, lead, mercury, etc.)
6. Poisons (inorganic or organic)
7. Reactives, water-reactive chemicals
8. Flammables

Different classes of hazardous chemical waste must not to be commingled in the same waste container. For example, do not combine inorganic heavy metal compounds with organic acidic waste solvents. In addition, do not combine non-hazardous waste (e.g., mixture of water, dilute acetic acid, and sodium bicarbonate) with hazardous chemical waste. Areas should contact EHS and I for assistance with these determinations.

G. Containment and Storage of Hazardous Waste

An integral part of any hazardous waste management program is the container storage areas. These areas are used to hold the waste prior to shipment to a permitted Treatment Storage and Disposal (TSD) facility. Individual hazardous waste generators shall maintain custody and control of their container storage areas. Generators should do the following regarding hazardous waste container storage:

1. Ensure the waste containers are accessible to the EHS & Insurance Office.
2. Accumulate their waste in safe, transportable containers that are properly labeled and stored to prevent human exposure to, or environmental release of, the hazardous waste materials.
3. Ensure that hazardous waste containers are compatible with the hazardous chemical waste contents (e.g., do not use metal containers for corrosive waste or plastic

containers for organic solvent). Currently, ACC's hazardous waste disposal vendor supplies each campus with containers.

4. Use containers that are in good condition and do not leak. All containers must have suitable screw caps or other means of secure closure. Also true of universal wastes, e.g., batteries?
5. When waste containers) are required, contact the EHS & Insurance Office for assistance on selection and placement of appropriate container type and size.

Never overfill hazardous waste containers. Expansion and excess weight can lead to spills, explosions, and extensive environmental exposure. The following guidelines will help prevent overfill of containers.

1. Containers of solids must not be filled beyond their weight and volume capacity.
2. Jugs and bottles should not be filled above the shoulder of the container.
3. Closed-head cans (5 gallons or less) should have at least two inches of headspace between the liquid level and the head of the container.
4. Closed-head drums (larger than 5 gallons) should have at least four inches of headspace.

Containers must be closed or sealed to prevent leakage. **All waste collection containers must be kept closed except when adding or removing material.**

H. Satellite Accumulation Area and 180-Day Accumulation Storage Areas

Hazardous waste that is generated at or near the point of generation is accumulated in a Satellite Accumulation Area (SAA). Once the waste leaves the SAA, it can be stored in 180-Day Accumulation Storage Area. As stated above in Section II, ACC has opted to store hazardous waste in compliance with the SQG regulatory requirements, which allows for 180-Day Accumulation Storage Area. Each accumulation area has specific requirements set forth in the regulations.

The following requirements pertain to **Satellite Accumulation Areas:**

1. The area is secured from "Unauthorized Entry".

2. Warning signs (specify) and emergency contacts are posted. These signs are available from EHS and I.
3. Hazardous waste is stored in a designated and marked area.
4. Storage containers are properly labeled with the words “hazardous waste” or with other words that identify the contents of the containers.
5. Storage containers are in good condition. If container begins to leak, the generator must transfer the hazardous waste from the leaking container to a container in good condition.
6. Storage containers must be compatible with the hazardous waste being stored (i.e. made of or lined with materials which will not react with the hazardous waste).
7. Storage containers must be closed except when adding waste.
8. Full storage containers are properly labeled as indicated above and marked with an accumulation start date (reflects the date of the day that the container becomes full). Once an accumulation start date is assigned, no more materials can be added to the container.
9. Areas must be accessible to EHS & Insurance personnel.
10. Hazardous waste containers are separated from non-waste chemicals.
11. Less than 55 gallons of any one hazard class of waste or one quart of acutely hazardous waste is being stored.
12. Full containers labeled and marked with an accumulation start date are not stored for more than three days. The generator must transfer full containers to the 180-Day Accumulation Storage Area within three days.
13. Appropriate spill Control Equipment is available.
14. Weekly inspection of the Satellite Accumulation Area must be completed, using the form in Appendix C

The following requirements pertain to **180-day Accumulation Storage Areas**:

1. The area is secured from “Unauthorized Entry".
2. Warning signs (specify) and emergency contacts are posted. EHS & Insurance is the RCRA designated Emergency Coordinator. These signs are available from EHS and Insurance Office.
3. Hazardous waste containers and drums stored in the container storage must adhere to the following guidelines.

a. Containers are properly labeled with the words “hazardous waste” and marked with an accumulation start date. Once an accumulation start date is assigned, no more materials can be added to the container.
b. Drums are marked with a completed RCRA sticker. ACC’s hazardous waste disposal vendor will apply appropriate Department of Transportation (DOT) labeling prior to shipment.
c. Containers are closed except when adding or removing waste.
d. Containers are in good condition and not leaking.
e. Containers are properly segregated according to hazard class and separated from non-hazardous waste chemicals.
f. Containers are stored to maintain aisle space to allow the unobstructed movement of personnel so that they can be inspected.
g. Containers have not been stored for more than 180 days (or 270 days if TSD facility is greater than 200 miles away.

4. Area is inspected weekly (Appendix C provides a copy of the **Container Storage Area Inspection Sheet**). Monthly inspection records are to be submitted to the EHS & Insurance Office by the 5th day of the following month. Inspection records are to be maintained for 1 year.
6. Appropriate spill prevention and control measures are established (see Appendix D).

I. Hazardous Waste Labels and Labeling

1. The original chemical label on containers used for waste accumulation must be destroyed or defaced.
2. EPA regulations require that hazardous waste containers be labeled with the words "Hazardous Waste" **when the hazardous waste is first added to the container**.
3. Containers at ACC can be labeled in one of two methods:
   a. For small containers (less than 5-gallons), attach a completed **Hazardous Waste Disposal Tag** (available from the EHS & Insurance Office) with string to each new waste container when the chemical is first added. **Print the information on the tag legibly. Do not fill in the accumulation start date.**
      - Alternate means of identifying waste constituents, dates and quantities may be used with the prior approval of EHS & I Office. These may be in the form of spreadsheets or tabulation documents that are supplied to EHS & I Office at the time a chemical waste pickup is requested.
   b. For containers larger than 5-gallons, a Hazardous Waste Label (available from the

EHS & Insurance Office) can be used. These labels have an adhesive back and are placed on the container when the chemical is first added. Hazardous waste labels for printing out are available through this hyperlink Hazardous Waste Labels. Identify the hazardous waste on the label but **do not fill in the accumulation start date.**

Follow the example below to properly complete your hazardous waste disposal tag:
Fill in the **Accumulation Start Date** and attach a completed waste disposal tag when the waste container is full and /or ready for pickup**.**

HAZARDOUS WASTE

ACCUMULATION
START DATE

CONTENTS acetone, chloroform, hexane

oil, water

HANDLE WITH CARE!

CONTAINS HAZARDOUS OR TOXIC WASTE

(ATTACH TAG TO CONTAINER WITH STRING)

HAZARDOUS WASTE DISPOSAL TAG

REQUESTOR[2]: John Doe

DEPT/PART: Chemistry

PHONE: 5-3140

CHEMICAL (S)[3]: Methylene Chloride, Toluene

HAZARDOUS WASTE DISPOSAL TAG

ACCUMULATION START DATE[1]: 5/22/96

REQUESTOR[2]: John Doe

DEPT/PART: Chemistry

BLDG.NAME & NO: Chemistry - 376

ROOM NO. 2002 PHONE: 5-3140

CHEMICAL (S)[3]: Methylene Chloride, Toluene

PHYSICAL PROPERTY: _____Liquid ____ Solid ____ Gas
___Other

Attach An Individual Hazardous Waste Disposal Tag To **Each** Waste Container

Both upper and lower sections of the tag must be filled out completely and legibly **except for the accumulation date** when chemical is first added to a waste container. (This information is essential for record keeping).

1 Fill in the **Accumulation Start Date** when the waste container is full and/or ready for pickup.

Secure the top part of the tag with a string that encircles the top of the container - **rubber bands, tape, and wire are not acceptable**.

2 The "REQUESTOR" is the Principal Investigator or person in charge of the lab that generated the waste.

3 Chemical name/Common name. **Chemical formulas or abbreviations are not acceptable**. List all chemical components in a waste container (including water). Lists may be continued on the back of the tag. Tags for containers of potentially explosive materials such as picric acid, silanes, nitro compounds, and ethers must indicate the percent concentration of these chemicals.

Place any additional Hazard Information about container contents in **REMARKS**.

J. Hazardous Waste Disposal & Tracking

The EHS & Insurance Office will supply ACC generators a Chemical Waste Request for Disposal form, coordinate disposal requirements with generators, maintain records of disposal services, and provide reports as appropriate to Federal or State agencies.

TCEQ and EPA regulations require "cradle to grave" tracking of hazardous waste shipments in order to ensure proper disposal. Two main forms are required: the Texas Uniform Hazardous Waste Manifest (Form TNRCC-0311) and land ban documentation. The manifest has four (carbon) copies: green, yellow, pink, and white. ACC's hazardous waste disposal vendor prepares all manifests on behalf of the College prior to pick up. The EHS & Insurance Office is responsible for signing all manifests by hand. Individuals signing manifests must be certified through appropriate and current training under 49 CFR – U. S. Department of Transportation (DOT) regulations. At the time of pick up, the initial transporter of the hazardous waste (ACC's hazardous waste disposal vendor) and generator (EHS & Insurance Office) provides a handwritten signature and date of acceptance on the manifest. The EHS & Insurance Office will retain the green copy and give the transporter the remaining copies of the manifest. The TSD facility must also sign the manifest upon receipt of the hazardous waste shipment. At this point, the transporter is given the yellow copy and the TSD facility keeps the pink copy and returns the original white copy with all signature blocks signed and dated to the EHS & Insurance Office.

The TSD facility must treat listed and characteristic hazardous waste to meet appropriate standards before land disposal. SQGs must determine whether their waste is restricted from land disposal. This can be done by testing, process knowledge, or a combination of both. SQGs shipping hazardous waste must attach a statement to the manifest declaring whether any land disposal restrictions (LDR) apply to the waste. The LDR includes information on the constituents, categories, and testing data, if available. ACC's hazardous waste disposal vendor will handle land ban testing of hazardous waste and will attach the appropriate information and statement (typically a LDR) to the manifest. However, ACC is still responsible for their waste and must also maintain land ban documentation for at least three years. ACC has chosen to maintain land ban documentation indefinitely.

The EHS & Insurance Office arranges vendor-performed routine hazardous waste disposal pickups at the end of each semester. Approximately one month prior to each pickup, the EHS & Insurance Office will contact all hazardous waste generators and request they complete a Chemical Waste Request for Disposal Form, identifying the hazardous wastes each generator has for the upcoming waste shipment. If a Hazardous Waste Tag is used, the bottom section of the tag must also be sent to the EHS & Insurance Office at this time. These requests are then compiled into a master list and provided to the hazardous waste disposal vendor. More frequent vendor pickups for hazardous waste may be scheduled by the EHS & Insurance Office based on needs at individual Campuses or areas.

The generator requesting hazardous waste disposal service shall ensure that their waste containers meet the following requirements:

1. The containers are not sitting in the corridors or areas where waste could cause a health exposure to personnel.
2. The containers are correctly identified by chemical name/common name. Chemical formulas are not acceptable. When a Hazardous Waste Disposal Tag is completed, **fill**

in the accumulation start date on the disposal tag, separate the bottom part of the tag, and Inter Office mail it to the EHS & Insurance Office.

3. Labeled containers of liquid/solid chemical waste that are to be stored in the in the 180-Day Accumulation Storage Area. Complete a Chemical Waste Request for Disposal Form for all containers of hazardous waste materials. Instructions for this form are available from EHS & Insurance's Web site.
4. Containers of liquid and solid waste are in good condition so that handling can be done in a safe manner and that containers do not leak at a later date. Containers must be suitable for the types of chemicals they hold and must be suitable for storage for at least 180 days. Containers must be closed or sealed in such a manner that leakage will not occur. ACC's hazardous waste disposal vendor will not pickup containers with improper caps, leaks, outside contamination, or improper labeling.
5. All hazardous waste containers are properly segregated and clearly marked regarding the contents, hazards and other pertinent information.
6. Inform the EHS & Insurance Coordinator (ext.3-1021) of any special handling requirements.
7. For lab packs send a Lab Pack Waste Request for Disposal form that includes a list of all chemicals and quantities to the EHS & Insurance Office.

K. SQG Emergency Preparedness and Contingency Planning

SQGs must designate an Emergency Coordinator to coordinate all emergency response measures. The emergency coordinator must be on the premises or on call. The EHS & Insurance Director is the Emergency Coordinator for all ACC campuses. EHS & I Office will provide the required signs for each generating area at each campus to post next to the telephone or in a visible location on outside waste storage buildings. These signs will contain the following information:

1. Post the name and telephone number of the emergency coordinator;
2. Location of fire extinguishers and spill control material, and if present, fire alarm; and
3. The telephone number of Campus Police Dispatch and the fire department, unless the campus has a direct alarm

As part of a facility's contingency planning, the EHS & Insurance office will attempt to make arrangements with the appropriate local emergency response authorities regarding the type of waste handled at the facility and the potential need for these organization's services. The arrangements should include the following:

1. Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;
2. Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and fire department;
3. Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
4. Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions or releases at the facility.

L. Hazardous Waste Management Recordkeeping & Reporting

1. Hazardous Waste Manifest – SQGs are required to keep a copy of each signed manifest for three years from the date the waste was accepted by the initial transporter. However, the EHS & Insurance Office has opted to maintain manifests indefinitely.
2. Land Ban Documentation - SQGs are required to retain on-site a copy of all notices, certifications, waste analysis data (including Land Disposal Restrictions for at least three years. As with the manifest, the EHS & Insurance Office will maintain them indefinitely.
3. Contingency Plans – SQGs are not required to maintain a written contingency plan.
4. Annual Waste Summary – SQGs must submit an annual waste summary to the TCEQ. SQGs may submit their summary in written format. The TCEQ uses this information to calculate a generator's annual waste generation fee.

V. Other Regulated Waste

A. Used Dry Solid Materials

Used dry solid materials (paper, rags, towels, gloves, or Kim Wipes, etc.) contaminated with a listed hazardous constituent or with extremely toxic chemicals must be double-bagged in heavy-duty plastic bags and disposed as hazardous waste. **Do not use biohazard bags**. ACC has also opted to treat dry solid materials contaminated with a characteristic hazardous constituent (a wipe in contact with a flammable solvent such as acetone) as hazardous waste. This is due to the potential for these type materials to also have been in contact with a listed hazardous constituent or extremely toxic chemical. The EHS & Insurance Office has permitted an alternative to hazardous waste disposal of dirty solvent rags with use of a commercial laundry service, G & K Services. In this case, G & K Services routinely picks up dirty solvent rags (that are typically stored in red metal flip top cans) for laundering and replaces them with clean rags.

B. Used Oil, Used Oil Filters and Used Antifreeze

Used oil is any petroleum-based or synthetic oil that has been used. Used oil that **has not been contaminated with any other hazardous material** is considered to be a non-hazardous waste. Used oil should be stored in storage containers (30 or 55-gallon metal or poly drums if possible) or tanks. Label all containers and tanks with the words "Used Oil". Keep containers and tanks in good condition. Do not allow tanks to rust, leak, or deteriorate. As a good management practice, keep containers and tanks closed unless adding to or removing used oil. Do not mix any hazardous material or waste with used oil. To be sure that your used oil does not become contaminated with hazardous waste, store it separately from all solvents and chemicals and do not mix it with anything. Used oil contaminated with a listed hazardous waste must be managed and disposed of as a hazardous waste. EPA hazardous waste code "F002" must be used on used oil that is listed due to halogenated contaminants. Non-contaminated used oil does not require an EPA hazardous waste code. Used oil is sent out for vendor recycling at ACC. When a used oil pick up is required, contact the **EHS & Insurance Office** and a pick up will be scheduled. Used oil can be accumulated indefinitely provided it is non-contaminated. Please accumulate at least 55 gallons before calling for a pick up.

Used oil filters are also picked up for vendor recycling. Texas law prohibits the dumping of used oil on land, in sewers, and in waterways. Texas has also banned used oil and used oil filters from being placed in or accepted for disposal in a landfill.

Currently ACC has one area, Riverside Campus Automotive, which generates used oil and used oil filters for vendor recycling.

Used antifreeze removed from vehicles may be a hazardous waste. The EPA or TCEQ have not issued specific regulations for used antifreeze, but general rules for hazardous waste can apply. After antifreeze goes through a radiator it may be contaminated with gasoline, oils and metals (includes lead, mercury, cadmium, chromium, copper and zinc). Metals and benzene (from gasoline) are toxic and may cause the used antifreeze to be a hazardous waste. Antifreeze would also be considered hazardous if it were mixed with a hazardous material such as a degreasing solvent or gasoline. In addition, antifreeze could be hazardous if it comes from an old car where the antifreeze has been sitting for years and has picked up enough metals to be characterized as hazardous for metals content, e.g., >5 parts per million (ppm) lead, or if the pH is ≥12.5.

ACC's disposal option for used antifreeze is vendor recycling, if available. If ACC's used antifreeze cannot be recycled, it must be disposed of as hazardous waste. Used antifreeze should never be dumped into a sanitary sewer, storm drain, ditch, dry well or septic system. Many sewage treatment agencies responsible for wastewater treatment prohibit waste antifreeze disposal into sanitary sewers. Waste antifreeze disposed of down storm drains or into surface? causes serious water quality problems and may harm people, pets and wildlife.

C. Gas Cylinders

Gas cylinders should be returned to the manufacturer or distributor whenever possible. Non-returnable gas cylinders should be labeled and disposed of as hazardous waste.

D. Photographic Processing Waste

Photographic lab waste containing silver must be disposed as hazardous waste. However, silver recovery units include a filtration system that removes the silver. Photographic lab effluent that does not contain silver may be discarded through the sanitary sewer system. **Please notify the EHS& Insurance Office if you have this type of equipment.**

E. Unknown Chemical Waste

"Unknown" chemical waste will be handled by the EHS & Insurance Office. Place a waste disposal tag on the container using "unknown" for the chemical waste description. In addition, mark or label the container as 'hazardous waste'. ACC will manage the waste as hazardous until testing results indicate otherwise. Any area generating an unknown chemical waste will be required to supply a documented

corrective action provided by the Dean, Director or unit head of the generating area.

F. Universal Waste

Universal waste is any hazardous waste subject to 40 CFR Part 273 (Standards for Universal Waste Management) and 30 TAC 335.261 (Universal Waste Rule). As part of EPA's commitment to reinvent environmental regulations, the Agency issues the "Universal Waste Rule." This rule was designed to encourage recycling and proper disposal of certain common hazardous waste wastes while also reducing the regulatory burden on facilities that generate these wastes. Basically, the TCEQ Universal Waste Rule offers alternatives to the otherwise applicable regulations for managing five types of hazardous waste in Texas:

A. Batteries including lead-acid as described in 40 CFR 273.2;
B. Pesticides as described in 40 CFR 273.3;
C. Mercury Thermostats as described in 40 CFR 273.4;
D. Lamps (mercury, metal halide, etc.) as described in 40 CFR 273.5; and
E. Paint and paint related waste as described in 30 TAC 335.262(b).

For more information please refer to the EHS & I Office web site Universal Waste Procedures or contact EHS & I Office for additional information.

G. Biohazardous Waste

Sharps (needles, razor blades, scalpel blades, syringes, glass Pasteur pipettes, etc.) are classified as bio-hazardous waste even if they are not contaminated. Sharps must be encapsulated (placed in a "puncture resistant" container or plastic/metal container and filled with paraffin or plaster of paris). Discard the containers of sharps as bio-hazardous waste. For additional information on disposal of bio hazardous waste, please refer to the EHS & I Office web site **Bio-Hazardous Waste Procedure (link to procedure)** or contact the EHS & Insurance Office for additional information.

H. Contractor Waste

Any hazardous waste that is generated in conjunction with contractor / vendor work performed for ACC falls under the same regulatory requirements as if ACC is the generator. Project managers, project coordinators and purchasing are responsible for clearly delineating in the contract that is responsible for managing the hazardous waste generated by a contracted project. The contract must clearly state that the vendor assumes responsibility for disposing of hazardous waste generated by a project in adherence to all applicable state and federal regulations. If it is not clearly stated in the contract that the vendor is responsible for hazardous waste disposal, ACC is responsible for proper disposal of any hazardous waste generated from the project being performed for the College. The project manger will be required to follow procedures outlined in this document. ACC still retains ultimate responsibility as generator of the hazardous waste. Refer to Contractor Safety Manual.

VI. Source Reduction and Hazardous Waste Minimization

Hazardous waste regulations have evolved from emphasis on reduction to the prevention of environmental pollution. The Pollution Prevention Act of 1990 (Federal Regulation) made the prevention of pollution and reduction of waste generation, a national priority. The Texas Waste Reduction Policy Act (Senate Bill 1099 of 1991) requires Large Quantity Generators to prepare and implement a Source Reduction and Waste Minimization Plan. At this time, ACC is not required to develop a Plan due to being a Small Quantity Generator. Appendix E has been included in the event a Plan is required to be developed due to an increase in generator status. The Plan will be developed and coordinated by the EHS & Insurance Office.

The key to the Plan is "front-end minimization". Front-end minimization means reducing hazardous waste by reducing the quantities of hazardous chemicals used and by substituting less hazardous materials. Teaching laboratories and other working groups (Physical Plant, Power Plant, etc.) that generate hazardous waste should review their purchasing practices and systems, chemical usage patterns, and workplace activities to identify potential points of their operations where source reduction and waste minimization can be implemented.

- Prudent Practices and Special Concerns

1. Minimizing Quantities of Hazardous Waste – It is common practice to order chemicals in larger quantities than necessary to take advantage of reduced costs of substances. As a result, aging reagents or solvents are left for disposal. With the current high disposal costs, often disposal is more than the initial acquisition cost of the chemicals. It is estimated that as much as 40% of laboratory hazardous waste may be unused chemicals. Besides reducing the disposal cost, smaller inventories reduce exposure to personnel. Storage of unused chemicals for an extended period of time tends to increase the risk of an accident.

   Another way to reduce quantities of waste is by precipitating out the active chemicals and drying or filtering the water from the hazardous waste. As waste technology advances, the removal of non-hazardous materials and separation of chemicals from waste is becoming more desirable. This is often most easily accomplished at the point of generation.

2. Substitution - Substitution of non-hazardous or less hazardous chemicals for a hazardous chemical is a commonly used method of reducing hazards and wastes. Examples include using hot water and soap for cleaning instead of toxic, flammable organic solvents; "Nochromix" instead of toxic chromic/sulfuric acids; water-based paints instead of oil-based paints; spirit-filled thermometers instead of mercury-filled thermometers; and non-carcinogenic solvents instead of carcinogenic solvents. Substitution is not always possible but should be accomplished when practical.

3. Surplus Chemical Exchange - The concept of exchanging excess solvents and reagents with other labs or departments needing these materials reduces purchasing and disposal costs. It has

been established that other labs can use about 30% to 40% of excessive or unused materials. Exchange of materials should be emphasized. EHS and I Office must be contacted to arrange for transportation of chemicals. Chemicals shall be transported by vendors that are certified / licensed to transport chemicals.

4. Unknown - Unknowns are a special problem in labs, especially when labs change occupants or processes. Labs should be cleaned up and old unneeded chemicals disposed of by the occupant who is terminating the use of the lab. Immediately label all chemicals so that they do not become unknowns. All chemicals, mixtures and solutions should be clearly labeled at all times. All unknowns will have to be analyzed by an EPA certified laboratory in order to have constituents or characteristics identified to allow for proper waste classification. Although analysis is often expensive and time consuming, there is no alternate solution to proper identification of unknown hazardous waste or materials. Cost for analysis and identification of any unknowns, whenever necessary, is the responsibility of the generator of the unknown hazardous waste and will be accomplished prior to request for disposal.

5. Special Laboratory Disposal Methods - The EPA and the TCEQ provide several regulatory exclusions that allow generators to treat hazardous waste without a permit. One on-site treatment method is elementary neutralization. This treatment is used to neutralize corrosive (D002) wastes. For example, small amounts of common inorganic acids (except hydrofluoric and chromic acids) can be diluted and neutralized to a pH between 5 and 10 and disposed of via the sanitary sewer. Hazardous chemicals can be treated to reduce the hazard or the quantity of waste in the laboratory **ONLY if the treatment procedure is included as part of the written experimental protocol. This must be approved through the EHS & Insurance Office.**

   Inert, non-toxic salts, sugars and buffers can be diluted and disposed via the sanitary sewer. Contact the EHS & Insurance Office before any treatment or disposal of chemical waste is performed in the laboratory.

6. Reactive Materials - Reactive wastes include cyanides, sulfides, air and/or water reactives, oxidizers, explosives, and flammable solids. Special care must be exercised when handling these materials to prevent contact with incompatible materials, such as air, water or organic materials. Reactives should be isolated from other hazardous waste and should be stabilized whenever possible. For example, water reactives should be stored in a desiccator and picric acid should always be saturated with water.

7. Disposal Costs - A lab-pack is the most common and most expensive method of packaging non-bulkable solid chemical waste, such as toxics and reactives, for disposal. Chemical waste materials in various sized containers are packed into metal drums for transportation and final disposal. An inert packing material (vermiculite) is used to surround and protect the containers. Lab-packs contain a maximum of 17 gallons of waste chemicals per 55-gallon drum, 8 gallons per 30-gallon drum, and 1 gallon per 5-gallon pail. The most recent disposal cost of a 55-gallon lab-pack averages about $550.00. This cost includes preparation, packaging, labeling, transportation, and ultimate treatment or disposal.

8. Non-hazardous Waste Disposal - All chemical wastes that do not meet the definition of a RCRA hazardous waste must still be disposed of properly to protect human health and the environment. In most cases, disposal via the sanitary sewer or the trash is not permitted; however, there are exceptions, which will be made by the EHS & Insurance Office on a case-by-case basis.

VII. Emergency Procedures

Chemical-using personnel and students (specify - what about students?) are required to receive training on the hazards associated with chemicals used and how to respond to emergencies). ACC Hazard Communication Program requires that ACC employees be informed of hazardous materials that they might use or be exposed to at work. In addition, the program should include training on handling spills and other emergencies. Material Safety Data Sheets (MSDSs) are a source of this information and should be maintained for all chemicals used or stored within a workplace. Special cleanup supplies should be available and employees should be trained on how to use these supplies. The EHS & Insurance Office can provide additional information on handling specific chemical spills. Hazardous waste disposal procedures should be followed for disposal of contaminated clothing, rags, absorbent materials or other waste generated from clean up of spills or leaks. All chemical-using areas should post emergency numbers to be used and develop a response scenario for emergencies. All chemical users should know emergency numbers and develop a response scenario for emergencies. Refer to ACC Hazardous Material Spill Procedure

APPENDIX A: DEFINITIONS

Accumulation Start Date -
The date when a hazardous waste container is full. This is the date from which a Small Quantity Generator has 180 days to dispose of the waste.

Acutely Hazardous Waste -
Wastes are considered "acutely hazardous". These are wastes that the EPA has determined to be so dangerous in small amounts that they are regulated the same way large amounts of other hazardous wastes are. These include all "P" listed wastes and mixtures under EPA waste codes F020, F021, F022,

F023, F026 and F027 from non-specific sources found in the federal regulations (40 CFR Part 261 Subpart D.).

180-Day Accumulation Storage Area –
Site designated by the Environmental Health Safety & Insurance Office to be used for the storage of hazardous wastes prior to shipment to permitted disposal facilities.

Characteristic Hazardous Waste **-**
Waste that exhibit one or more of the four characteristics referenced in the federal regulations (40 CFR Part 261 Subpart C) is considered hazardous.

Disposal **-**
The discharge, deposit, injection, dumping, spilling, or placing of any solid waste or hazardous waste (whether containerized or non-containerized) into or on any land or water so that such solid waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any water, including ground waters.

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

Facility –
Includes all contiguous land, and structures, other appurtenances, and improvements on the land used for storing, processing, or disposing of municipal hazardous waste or industrial solid waste.

Generator –
Any *person*, by site, who produces municipal hazardous waste or industrial solid waste; any person who possesses municipal hazardous waste or industrial solid waste to be shipped to any other person; or any person whose act first causes the solid waste to become subject to regulation. *Person* refers to an individual, trust, firm, corporation, Federal Agency, State, political subdivision of a State, municipality, or any interstate body.

Hazardous Material –
A substance or material, including a hazardous substance, which has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and which has been so designated.

Hazardous Waste –
Any solid waste material listed or identified in Title 40 Code of Federal Regulations, Part 261, Subpart C and D or exhibiting the characteristics of ignitability, corrosivity, reactivity, or E.P.A. toxicity also defined in Part 261. Tables containing the listing and characteristics of hazardous wastes are shown in Appendix B.

Lab Pack -

Method of categorizing unused, obsolete or unknown chemicals, determining the optimum disposal process, and implementing **lab pack disposal.** Qualified personnel pack these materials in compliance with EPA and DOT regulations. For example, the EPA requires that carriers be federally licensed and insured and that disposal facilities comply with their standards. The DOT mandates that waste materials be packaged, labeled and shipped according to its regulations.

Listed Hazardous Waste -
Over 400 commercial chemical products and wastes from specific industrial and manufacturing processes are listed as hazardous wastes in the Code of Federal Regulations (40 CFR Part 261 Subpart D.) Listed wastes have a chemical specific or generic mixture identification number assigned by the EPA. For example; Phenol is U188, a certain chlorinated solvent mixture might be F002 depending of the mixture. Listed waste consists of four lists defined by the EPA, the K-list, F-list, U-list and P-list.

Manifest –
A legal document containing required information, which must accompany shipments of Municipal Hazardous Waste or Class I-Industrial Solid Waste transported on public roads or thoroughfares.

Mixed Waste –
A radioactive waste that is also a hazardous waste.

Permit –
A written document issued by EPA or TCEQ that, by its conditions, authorizes the construction, installation, modification, or operation of a specified municipal hazardous waste or industrial solid waste storage, processing, or disposal facility in accordance with specified limitations.

Person -
Any individual, corporation, organization, government or governmental subdivision or agency, business trusts, partnership, association or any legal entity.

Processing –
The extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or as to recover energy or material from the waste or so as to render such waste non-hazardous or less hazardous; safer to transport, store, and dispose; or amenable for recovery, amenable for storage, or reduced in volume.

Recyclable Materials –
Wastes that are recycled. Recycled material is used, reused, or reclaimed.

Reclaimed material –
Is processed or regenerated to recover a usable product. Examples: Recovery of lead from spent batteries, or regeneration of spent solvent.

Satellite Accumulation Area –
An area, system, or structure used for temporary accumulation of hazardous waste prior to transport to the central accumulation area.

Solid Waste –
Any garbage, refuse, sludge from a waste treatment plant, water treatment plant, or air pollution control facility or other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, municipal, commercial, mining and agricultural operations, and from community and institutional activities.

Storage –
The holding of solid waste for a temporary period, at the end of which the waste is processed, disposed of, recycled, or stored elsewhere.

Texas Solid Waste Number –
The number assigned by the TCEQ to each generator, transporter, and processing, storage, or disposal facility.

TCEQ -
The Texas Commission on Environmental Quality is the governing agency responsible for regulating the discharge of pollutants into waters of the state; regulates hazardous and industrial solid waste generation, storage, transportation, treatment and disposal; and regulates the cleanup of inactive and abandoned hazardous waste sites in the State of Texas.

Transporter –
Any person who conveys or transports municipal hazardous waste or industrial solid waste by truck, ship, pipeline or other means.

Universal Waste –
Any hazardous waste subject to 40 CFR Part 273 and 30 TAC 335.261 to include:

F. Batteries including lead-acid as described in 40 CFR 273.2;
G. Pesticides as described in 40 CFR 273.3;
H. Mercury Thermostats as described in 40 CFR 273.4;
I. Lamps as described in 40 CFR 273.5; and
J. Paint and paint related waste as described in 30 TAC 335.262(b).

Used Oil -
Used oil is any petroleum-based or synthetic oil that has been used

Waste –
Any material for which there is no use and is to be discarded as valueless.

APPENDIX B: IDENTIFICATION OF HAZARDOUS WASTE

40 CFR

Subpart C—Characteristics of Hazardous Waste

Appendix C - SATELLITE ACCUMULATION AREA WEEKLY INSPECTION FORM

Following 2 forms will be posted on web and hyperlinked to program

180 Day Accumulation Area Inspection Sheet

Weekly Inspection

Location:_____ Date: _____

Department: _____ Contact Person: _____

Inspected by: _____

Accumulation Time

1. Is the beginning date of accumulation clearly indicated on each container? □ N/A □ Yes □ No
2. Has accumulation time limitation been exceeded? □ N/A □ Yes □ No
3. Has accumulation quantity been exceeded? □ N/A □ Yes □ No
4. Is each container being used to collect waste marked "Hazardous Waste" and identifiable contents? □ N/A □ Yes □ No

Comment:

Containers

1. Are containers in good condition? □ N/A □ Yes □ No
2. Are all containers kept closed and stored in a safe manner? □ N/A □ Yes □ No
3. Is waste compatible with container? □ N/A □ Yes □ No
4. Any noticeable chemical contamination on the containers? □ N/A □ Yes □ No
5. Are containers inspected weekly for leakage and deterioration? □ N/A □ Yes □ No

Comment:

Storage

1. Are incompatible wastes appropriately separated? □ N/A □ Yes □ No
2. Does the storage area have containment protection? □ N/A □ Yes □ No
3. Are spill cleanup supplies available? □ N/A □ Yes □ No

Comment:

4. Does the inspection log include:
   A. Date and time of inspection? □ N/A □ Yes □ No
   B. Name of inspector? □ N/A □ Yes □ No
   C. Recorded observation and date of repairs/remedial action? □ N/A □ Yes □ No

Comment:

Discharges

1.	Is there any evidence of spills or leaks from the waste?	□ N/A	□ Yes	□ No
2.	Is there any evidence of fires or explosion from the waste?	□ N/A	□ Yes	□ No

Comment:

Security

1.	Is area secured from Unauthorized Entry?	□ N/A	□ Yes	□ No
2.	Is the area have a "Danger - Unauthorized Personnel Keep Out" sign posted?	□ N/A	□ Yes	□ No
3.	Does the area have a "Danger - No Smoking" sign posted?	□ N/A	□ Yes	□ No
4.	Are emergency contacts and phone numbers posted?	□ N/A	□ Yes	□ No

Comment:

WEEKLY 180 DAY ACCUMULATION AREA INSPECTION LOG SUMMARY
Submit to EHS & I by 5th of Following Month
Month _____, _____

Date/Time	Inspector	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Comments

Place a " √ " in the Category that is "Satisfactory"
Place an "X" in the Category that is "Not Satisfactory"
Place "N/A" if it does not apply

1. **General Order**
2. **General Cleanliness**
3. **Building Condition**
4. **Spill Containments**
5. **Equipment**
   - **A. Eye protection**
   - **B. Spill pillows, plastic disposal bags**
   - **C. Gloves, tyvek suits, etc.**
   - **D. Sock / absorbent**
   - **E. Mop, broom, bucket, dustpan**
6. **Fire extinguishers**
7. **Locks**
8. **Ground Wire**
9. **Electrical/Lights**
10. **Telephone**
11. **Ventilation**
12. **Emergency Eyewash**
13. **Emergency Shower**
14. **Drum Storage**
    - **A. Drum Condition**
    - **B. RCRA Stickers**
    - **C. Isle Width**
    - **D. Non-leaking Drum**

President/Executive Vice President:_____ Date:_____