



HAZARDOUS WASTE POLICY

SCOPE: Hazardous wastes include those substances listed in 40 CFR Subpart D 261:31 (F list), 262:32 (K list), 262:33 (P and U lists) and/or the substances that exhibit hazardous characteristics of ignitability, corrosivity, reactivity, or toxicity as defined in 40 CFR 261:21, 261:22, 261:23 or 261:24 respectively.

PURPOSE: The purpose of this policy is to provide a process to define, store, and properly dispose of hazardous wastes in a manner that minimizes the potential impact on the environment. The policy also provides for proper employee training along with guidelines on preparedness and prevention and emergency response.

DEFINITIONS:

- ❖ Solid Waste – A solid waste is any solid, liquid or contained gaseous material that is discarded or abandoned.

HAZARDOUS WASTE: The College will dispose of materials as hazardous waste when it satisfies one of the following criteria:

The material appears on one of the following lists:

- ❖ Non-specific source wastes (40 CFR 261.31) which includes generic wastes commonly produced by industry. Examples include spent halogenated solvents used in the degreasing and wastewater treatment sludge from electroplating processed, as well as dioxin wastes, most of which are acutely hazardous wastes.
- ❖ Specific Source Wastes (40 CFR 261.32) which includes wastes from specifically identified industries, such as wood preserving, petroleum refining, and organic chemical manufacturing. Examples include sludges, still bottoms, wastewaters, spent catalysts, and residues.
- ❖ Commercial Chemical Products (40 CFR 261.33(e) and (f)) which include discarded commercial chemical products, off-specification commercial chemical products manufacturing chemical intermediates, and container residues and spills of these materials. Examples include chemicals such as chloroform and creosote, acids such as sulfuric acid and hydrochloric acid and pesticides such as DDT and Kepone.

And/or it exhibits one or more of the following hazardous characteristics:

- ❖ Ignitability (40 CFR 261.21) – This includes materials with a flash point under 140 degrees F, oxidizers, ignitable compressed gases and materials with a flash point below 13% by volume.
- ❖ Corrosivity (40 CFR 261.22) – In its aqueous solution the material has a pH either below 2 or above 12.5.
- ❖ Reactivity (40 CFR 261.23) – The material is normally unstable, or reacts violently with water.
- ❖ Toxicity (40 CFR 261.24) – Includes wastes that are harmful or fatal when ingested or absorbed, or leach toxic chemicals into the soil or groundwater when disposed or on land.

HAZARDOUS WASTE DETERMINATION

A significant amount of waste processed off site is unused product for which MSDS(s) are available. Additionally, suppliers are available to assist in the waste determination process. In the case of Biology and Chemistry where several chemicals may be combined to form a substance that possess waste characteristics that are unknown, a HAZARDOUS WASTE DETERMINATION FORM shall be completed. Based on the outcome of that process the waste will be processed accordingly. It will be necessary, in some situations, to send samples to a laboratory for analysis to assist in the determination process. All HAZARDOUS WASTE DETERMINATION FORMS along with all laboratory results will be forwarded to the Mgr, EPA Audit for auditing and recordkeeping.

GENERATOR CATEGORY: The amount of hazardous waste will be documented each month. The College will generally be considered a Conditionally Exempt Small Quantity Generator (up to 100 kg/mo of hazardous waste and up to 1 kg of acutely hazardous waste) but some months will exceed 100 kg and be considered a Small Quantity Generator (SQG).

SATELLITE ACCUMULATION AREAS: The College will use satellite accumulation areas (SAA) at or near the point at which hazardous waste is generated. The following rules will be followed



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- ◆ No more than 55 gallons of hazardous waste or 1 quart of extremely hazardous waste may be stored in a SAA.
- ◆ Containers will be in good condition
- ◆ The container will be compatible with its contents
- ◆ The containers will be kept closed except when waste is being added or removed from them
- ◆ The container label must have the words HAZARDOUS WASTE along with the chemical name of the contents
- ◆ The date material was first placed in a container
- ◆ Incompatible wastes will not be placed in the same container.
- ◆ Containers will be stored in or within an area that provides secondary containment (a room with impermeable floor (without drains) and walls can serve as secondary containment).
- ◆ Materials in the SAA(s) will be moved to a 180 day accumulation area prior to the hauler removing hazardous waste at the end of each semester
- ◆ Evaporation will not be used as a means of disposal.

180 DAY ACCUMULATION AREA: The College has three accumulation areas. They include the hazardous waste storage building behind the Brown Bldg, the chemical storage room in Musser, and the chemical storage area in SMEC building. The hazardous waste stored in these accumulation areas will be packed and transported at the end of each semester. Accumulation of hazardous waste in these accumulation areas will never exceed 6,000 kg. Containers in the accumulation areas will have the date that the containers arrived and the words HAZARDOUS WASTE on the label. Containers will be stored within or in an area that provides secondary containment designed to adequately contain a release or spill from the primary container (110% of the container's holding volume). A room with an impermeable floor (without drains) and walls is considered secondary containment. Waste shipments will be scheduled in mid June and after the students leave in December. More shipments can be scheduled if needed, but not less.

EMERGENCY PROCEDURES: The following procedures are in place to prepare the site and it's employees for an emergency event involving hazardous waste.

- ◆ The emergency coordinator (Mgr, EPA Audit) will be on the premises or on call to coordinate emergency response activities.
- ◆ Signs are posted at the phones at each of the accumulation areas with the following information: location of the fire extinguisher, location of spill control materials, location of the fire alarm (if there is one) and the emergency phone number of Campus Security.
- ◆ Employees are thoroughly familiar with proper waste handling and emergency procedures relative to their job responsibilities.
- ◆ In the event of a fire, contact Campus Security and report the condition and location.
- ◆ In the event of a spill, contact Campus Security and report the condition and obtain materials to contain the spill.
- ◆ In the event an incident could threaten human health outside the facility or when the generator has knowledge that a spill has reached the waters of the Commonwealth, contact the Emergency Response Center (PaDEP) at 877-333-1904 or the National Response Center at 800-424-8802 and provide the following information:
 1. The name, address and the EPA identification number of the generator
 2. Date, time, and type of incident
 3. Quantity and type of hazardous waste involved in the incident.
 4. Extent of injuries, if any
 5. Estimated quantity and disposition of recovered materials

TRAINING: Employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies. Periodic training on these procedures will be provided.

PREPAREDNESS AND PREVENTION: The following practices and equipment are in place to assist in the preparedness and prevention of an unplanned event in the accumulation areas:

- ◆ The hazardous waste accumulation areas will be maintained and operated to minimize the possibility of an event that would result in the release of hazardous wastes to the air, waters of the commonwealth, or soil which could threaten human health or the environment.



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- ◆ The following equipment is in place at the accumulation areas to assist in the mitigation of an unplanned event:
 1. A fire alarm system
 2. A telephone
 3. A fire extinguisher and spill control equipment
 4. Water at adequate volumes and pressure to support fire fighting equipment
- ◆ The accumulation areas and the associated equipment will be inspected monthly.
- ◆ Adequate aisle space will be provided at the accumulation areas to allow the unobstructed movement of personnel, fire protection equipment, and spill control equipment.
- ◆ Local emergency response organizations including the police, fire department and emergency response contractors have been made given a tour and made aware of the unique hazards present in the accumulation areas.

PREPARING HAZARDOUS WASTE FOR SHIPMENT: The following activities will be completed before a transporter removes hazardous waste from the College:

- ◆ Hazardous waste will be packaged in accordance with the Department of Transportation regulations 49 CFR Parts 172, 178 & 179.
- ◆ Hazardous waste will be labeled in accordance with the Department of Transportation regulation 49 CFR Part 172.
- ◆ Hazardous waste containers will be marked in accordance with Department of Transportation 49 CFR 172:304. Specifically the marking will include:
 1. Hazardous Waste – Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.
 2. Generator's Name and Address
 3. Generator's EPA Identification Number
 4. Manifest Tracking Number
- ◆ Transporter's vehicle will be placarded in accordance with the Department of Transportation regulation 49 CFR Part 172, Subpart F.

NOTE: While the College is responsible for the packaging, labeling, and marking containers of hazardous waste and placarding the hauler's vehicle, the College will use brokers/haulers that provide those services and that possess current USDOT Hazardous Material Transportation training.

MANIFESTS: The following process will be used in completing, distributing, and recording hazardous waste manifests:

- ◆ All copies of the manifest will be legible.
- ◆ Again the College will use the services of a broker or hauler to complete the manifests. The College will insure that the manifest is proper and complete.
- ◆ When the transporter picks up the hazardous waste both the transporter and the College must sign the manifest. The transporter will give the College copy # 6 for their records and take the rest of the copies.
- ◆ The TSD facility has 30 days to sign and return copy # 3 to the College for their records.
- ◆ The College will retain both copies of the manifest for a minimum of three years.
- ◆ If the College does not receive a copy of the manifest from the TSD facility within 60 days they will provide the DEP with a copy of the manifest along with an explanation.
- ◆ Manifest will only be signed by employees that have been properly trained. Ordinarily the Manager of EPA Audit will schedule the waste shipment and sign the manifest. In his/her absence the Manager of Risk Management will be asked to sign the manifest and if he/she is not available, the ES Team Leader (Eli Saylor) will sign the manifest.
- ◆ If the information listed below is not correct or incorrect or is incomplete on the manifest, it will not be signed.
- ◆ The following information must be present on the manifest and correct before the manifest is signed:
 - Generator ID # PAD987272291, Elizabethtown College, One Alpha Drive, Elizabethtown, PA 17022, Phone #717-361-1547.
 - Manifest tracking number.
 - Transporter ID # Bishop Associates #MDR000511352, telephone number and driver signature.



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- Designated Facility ID # (Cycle Chem., Inc. # PAD067098822), address and telephone number.
- Waste codes (not all wastes have codes, but when not listed an inquiry will be made).
- Packing lists for Lab Packs accompany manifest.
- Land Disposal Restrictions – a copy to be signed by the generator and accompanies the manifest.
- The driver must have a current DOT medical certification. They need a CDL driver's license with an H endorsement in any state. And they need to be able to provide evidence that the truck they propose to haul the waste in is a licensed, hazardous waste vehicle in the state of Pennsylvania.
- The truck must have the proper placards.
- Containers/drums must be in good condition, properly labeled and quantified

KEEPING RECORDS OF HAZARDOUS WASTE ACTIVITIES: The following records will be maintained for a minimum of three years with regards to the characterization, storage and disposing of hazardous waste:

- ◆ A copy of the manifests given to transporters of hazardous waste will be retained for at least three years.
- ◆ A copy of the manifests returned by the designated facility will be retained for at least three years.
- ◆ Test results, waste analysis and other characterizations of hazardous waste will be maintained for at least three years.