

Hazardous Waste Management Program

POLICY

Whitworth University is committed to the responsible handling and disposal of hazardous waste. The hazardous waste management program outlines procedures and requirements to ensure the university is compliant with part 173-303 of the Washington Administrative Code. The Washington State Department of Ecology regulations (WAC 173-303) contain additional waste management related requirements, such as the maintenance of emergency equipment, that are addressed in other university programs.

SCOPE

The hazardous waste management program applies to the entire university, and it is primarily focused on hazardous waste generators. Individual procedures may vary by department, however, compliance with waste management regulations is an overall responsibility of the university.

RESPONSIBILITIES

Chemical Hygiene Officer: The Chemical Hygiene Officer, in coordination with department representatives and campus safety personnel, has the responsibility to ensure that the elements of this plan are implemented in compliance with WAC 173-303. He/she is also responsible for providing waste generators with training and guidance to ensure the proper handling of on-campus waste and off-site disposals.

Waste Generators: Waste generators are employees who generate waste that is regulated because it meets the definition of a “dangerous waste” as described in WAC 173-303-090. This can occur through a variety of activities including academic activities (course instruction, research, demos, etc.) or conducting maintenance activities. Waste generators are responsible for reviewing and abiding by the established procedures in the hazardous waste program as well as the standard operating procedures specific to their department or task. This will ensure that the handling of waste complies with applicable regulations and Whitworth University’s hazardous waste management program.

PROCEDURES AND REQUIREMENTS

1. Designation

Designation is the process of determining whether a waste is regulated under WAC 173-303 and if so, what waste codes apply to it. See [Master Forms List](#) for the Designation Checklist form.

Generators must ensure that all waste goes through this designation process and that the designation outcome is documented (even if the outcome is non-regulated). Generators are encouraged to consult with the Chemical Hygiene Officer to complete this designation.

Consultation with the Chemical Hygiene Officer should occur **prior** to waste generation. Certain types of waste are designated as Extremely Hazardous Wastes, these require additional care in management and have quantity restrictions

2. Satellite Accumulation

Satellite Accumulation areas are locations at or near the point of waste generation where hazardous waste is initially accumulated prior to consolidation at the 180/90 day accumulation area(s).

These areas must be identified by signage and secured to prevent improper addition of waste. Each department is responsible for the identification and security of satellite accumulation areas under their control. Quantity and time limits apply to waste in satellite accumulation areas.

Review the section for 180/90 day accumulation areas and transfer of waste for more details.

3. 180/90 Day Accumulation Areas

180/90 Day Accumulation Areas are places where waste is kept when it is removed from satellite accumulation and is awaiting shipment for treatment and disposal.

The Chemistry and Biology departments have small 180/90 day accumulation areas that serve as intermediate collection areas between satellite accumulation and the campus-wide 180/90 day accumulation area. There are also waste stream specific 180/90 day accumulation areas in Facility services. The campus-wide 180/90 day accumulation area is located in room 145 in Robinson Science Hall. Emergency response and contact information is required to be posted in all satellite and 180/90 day accumulation areas.

4. Inspections

Weekly inspection of all containers in 180/90 day accumulation areas is required by WAC 173-303-630(6). Inspections must include the integrity of containers as well as accuracy and completeness of labels.

Inspection of 180/90 day accumulation areas is accomplished by either the Chemical Hygiene Officer or a designated and trained individual within a specific department. See department

specific standard operating procedures for more details. All inspections must be documented and kept on file with the Chemical Hygiene Officer.

5. Transfer of waste

When the waste in a satellite accumulation area has reached its quantity limit (55 gallons for dangerous waste, 1 quart of extremely hazardous waste) the date must be recorded on the container label and the container moved to a 180/90 day accumulation area within 3 days. Most of Whitworth's satellite accumulation areas cannot accommodate the allowed volume of 55 gallons of waste, so as soon as a container is full it must be marked with the date and moved to a 180/90 day accumulation area within 3 days, regardless of volume. In this instance, "full" is defined as either actually full or if no more waste generation of that type is anticipated in the immediate future. Waste generators are responsible to ensure that their waste is moved from satellite accumulation to the 180/90 day accumulation area within the 3-day time limit. Waste movement into Robinson Science Hall room 145 is accomplished in coordination with the Chemical Hygiene Officer and the exact process differs by department. Waste generators should review their department specific standard operating procedure for more details. All waste entering room 145 is to be recorded on the waste receiving log and placed on the receiving shelves for further management.

6. Log and Weigh

The Chemical Hygiene Officer is responsible to ensure that all waste on the receiving shelves in Robinson Science Hall room 145 is regularly logged. The logging process involves assigning an identification number to the waste bottle, recording its contents and other information, including mass and tare weight. Containers are inspected to make sure they are sealed and that labels are filled out correctly and completely. The log and weigh process applies to all hazardous waste located in Room 145. Other accumulation areas are not subject to this procedure.

7. Documentation and Generator Status

The Chemical Hygiene Officer is responsible for maintaining an accurate waste log for the university. This information is used to determine the total quantity of hazardous waste that is generated by the university each month. The monthly quantities dictate whether Whitworth is classified as a small, medium, or large quantity generator. Whitworth's responsibilities under part 173-303 of the Washington Administrative Code are determined by the University's current generator status. Employees should contact the Chemical Hygiene Officer to obtain Whitworth's current generator status. Universal waste is not counted towards the University's generator status.

The Chemical Hygiene Officer will also maintain waste log spreadsheets, all waste designations, waste profiles, Safety Data Sheets (when appropriate), inspection records and shipping manifests.

8. Shipping Hazardous Waste

Certain waste streams require shipment preparation in the form of bulking and combining smaller containers of similar content into larger shipping containers. The Chemical Hygiene Officer coordinates with waste packers to pack up/bulk up waste as necessary and applicable. The Chemical Hygiene Officer also arranges a time for the contracted waste vendor/transporter to pick up waste. For bulked waste, this time is usually a couple of days after the 'bulking' to allow the drums to settle so they are safe to transport (24 hours are required). Arranging for shipment also requires that waste profiles from the waste treatment, storage and disposal facility be approved and signed by the Chemical Hygiene Officer. When the waste is picked up, the hazardous waste manifest will only be signed by an individual that has completed the appropriate Department of Transportation Hazardous Materials training. *See Master Forms List for the Shipment Checklist form.*

9. Annual Report

Whitworth University is required to submit a report detailing the type and quantity of waste that was generated and its method and location of disposal. The annual report is required by state and federal law and is submitted through an online portal directly to Washington State Department of Ecology. This report is generated by the Chemical Hygiene Officer and must be approved by an Executive or Dean of the university.

WASTE DISPOSAL COSTS

Costs associated with the management and disposal of wastes routinely generated by Chemistry, Biology, Art and Facility Services are charged to the Government Compliance budget line managed by the Chemical Hygiene Officer. Non-routine waste disposal costs (either from these departments or from other departments) may require cost sharing from the generating department, College of Arts & Sciences, Academic Affairs, and/or the University.

STANDARD OPERATING PROCEDURES

Departments are either considered routine generators or occasional generators. In compliance with this program, each routinely generating department (Chemistry, Biology, Art and Facility Services) follows a waste management standard operating procedure with detailed waste management

information. All other departments are considered occasional generators and detailed management information can be found on the “occasional generator” standard operating procedure.

OTHER TYPES OF WASTE

1. Biohazard wastes

In most cases, wastes that are considered ‘biohazardous’ are not ‘dangerous waste’ by strict definition and therefore are not regulated in the same way. Biohazard waste should be autoclaved or treated with bleach by the individual generating the waste to render it innocuous. Small quantities of contaminated sharps (in a proper container) are accepted at the campus health center with prior approval.

For more information, see Whitworth’s Bloodborne Pathogen program and the Academic Biosafety Program

2. Non-Contaminated Sharps

Once packaged in a safe manner, non-contaminated sharps can be disposed of in the trash. Special broken glass collection boxes are used in locations, such as labs, where broken glassware can be reasonably anticipated. When full, these boxes are to be securely taped shut and placed near the building dumpster for the Grounds department to pick up and take to the large campus dumpster.

3. PCB Wastes

Polychlorinated biphenyls (PCBs) and materials contaminated with PCBs are regulated under both state and federal law, however most of the requirements can be found in the Toxic Substance Control Act (TSCA). Specifically, PCB information can be found at 40 CFR, Chapter I, Subchapter R, Part 761. Any department or individual planning to generate waste that contains PCBs **MUST** coordinate with the Chemical Hygiene Officer in advance to ensure compliance with all applicable regulations.

TRAINING

In accordance with WAC 173-303-201(2)(c)(iii) all employees who generate, handle, move, accumulate or send waste for disposal and those who supervise those that do, require adequate training in order to complete the necessary tasks according to all applicable regulations and procedures. This training requirement is applicable only when Whitworth is a medium-quantity generator. Additional training requirements exist for large-quantity generators.

Whitworth requires hazardous waste training within 6 months of employment and annually thereafter. All waste handling activities shall be supervised by a trained employee until initial training is complete. At a minimum, training shall include a review of the applicable regulatory standards as well as department specific operating procedures. Documentation of training shall

include the names of the individuals trained, the topics covered, the date and the name of the trainer or source of the training.

PROGRAM EVALUATION

The hazardous waste management program is evaluated every other year by the Chemical Hygiene Officer/designee to ensure it is effective in practice and that it complies with all applicable regulations.

DEFINITIONS

Department of Ecology - The agency that has delegated authority from the federal Environmental Protection Agency to regulate the handling and disposal of dangerous waste in the state of Washington.

Standard Operating Procedure - For the scope of this program, these documents convey the detailed ways in which individual departments achieve compliance with this program.

Dangerous Waste - Any waste that meets the definitions described in WAC 173-303-090. This includes everything that meets the definition of a Hazardous Waste (Federal Definition in 40 CFR Subchapter 1) as well as state specific definitions. The term Dangerous Waste can also be used to describe waste that ONLY meets the state's definition and not the federal definition.

Universal Waste - Waste that would normally meet the definition of a Dangerous Waste, but because of the universal use of these items, special slightly-relaxed regulations are employed for their management. These items can only be called Universal Waste (instead of Dangerous Waste) if all of the special regulations found at WAC 173-303-573 are followed. Universal Wastes are batteries, mercury containing equipment (thermostats, etc.) and lamps (bulbs). Note that although used oil is not an official Universal Waste it too has a special set of regulations governing its handling and disposal, so used oil and universal wastes are often grouped together.

REFERENCES

Washington State Department of Ecology Dangerous Waste regulations: Washington Administrative Code Chapter 173-303.

Environmental Protection Agency regulations: Title 40 Code of Federal Regulations

If you have questions regarding Whitworth University's hazardous waste program, please contact the University's Chemical Hygiene Officer at 777-4339.

