# HAZARDOUS WASTE Satellite Accumulation Areas

EPA'S FIVE MOST COMMON SATELLITE ACCUMULATION VIOLATIONS IN UNIVERSITIES

- Unlabeled Containers.
- Open Containers.
- No "Accumulation Start" date.
- No Secondary Containment.
- No Weekly Inspections.

### CHEMICAL WASTE MANAGEMENT

- "Hazardous Material" is any liquid, solid, or gas having properties requiring special handling due to hazardous chemical characteristics.
- "Hazardous waste" is a used or discarded hazardous material. "Discarded" includes abandoned, recycled, or inherently waste-like materials.

## YOU MIGHT HAVE A HAZARDOUS WASTE IF ....

- The compound or solution is:
  - Ignitable.
  - Corrosive.
  - Reactive.
  - Toxic.



- The Waste Chemical is one of over 400 listed by the EPA as a Hazardous Waste
- See EH&S Website for a list of these chemicals.

## WHAT IS AN IGNITABLE WASTE?

- It is a liquid and is capable of burning or causing a fire.
- This material will have a flash point <u>below 140° F</u>.
- Examples: Acetone, gasoline, industrial alcohols.



## WHAT IS A CORROSIVE WASTE?

- The material is a liquid or solid and is capable of eroding materials and human tissue.
- These materials have a pH of <u>2 or less or 12.5 or</u> <u>greater</u>
- <u>Examples</u>: Alkaline cleaners, some chlorides, fluorides, and acids & bases.



## WHAT IS A REACTIVE WASTE?

- Capable of reacting dangerously with air and water.
- When mixed with water could cause an explosion.
- Could release poisonous fumes,
- Shock sensitive.
- <u>Examples</u>: Peroxides, isocynates, cyanides, sulfides, and chlorine.

## WHAT IS A TOXIC WASTE?

- Material is capable of poisoning humans.
- Includes arsenic, barium, cadmium, chromium, lead, mercury, selenium, or silver.
- Contains a pesticide or other EPA toxin.
- Wastes are determined to be "Toxic" if they fail the TCLP Test.



## P-LISTED WASTES

- Are listed wastes that are off-specification, unused, materials and are acutely hazardous.
- <u>Examples</u>: Arsenic compounds, cyanide compounds, and strychnine
- P-codes are used for listing. They only apply to pure unused chemicals and to unused products where said chemical is the sole active ingredient.
- Regulations on storage and disposal are very strict.
- Identifiable by P-Listing and the "List-of-Lists".

### P-LIST WASTE/CHEMICAL WASTE STORAGE

- Regulated under 40 CFR 262.34(c).
- Labs can collect hazardous waste until they reach collection limits or for a maximum of up to <u>1 year.</u>
  - Collection Limits are 55 gallons of hazardous waste and/or 1 quart of P-listed acute hazardous wastes at <u>ANY</u> time.
    - Can only exceed these limits for 3 calendar days.
    - Contact EH&S for pickup when containers become 75% full.
  - Containers must be labeled as hazardous waste or otherwise describing the content of the waste.
    - List all chemicals on hazardous waste tag as well as their percentages/concentration.
    - Containers must be dated with an accumulation start date (the date chemicals were first placed in the container).
- Transfer of containers between Satellite Accumulation Areas is not allowed.
- Large Quantity Generator status is obtained if over 1 kg of P-listed waste per month is produced and/or 1000 kg of chemical hazardous waste is produced per month.

## WASTE MIXTURES

- Keep non-soluble chemicals separate.
- Keep chlorinated solvents separate from non.
- Precipitate dissolved solids and filter what remains.
- Minimize water in solvents.
- Teach waste minimization as part of lab instruction.
- Remember you pay for chemicals twice. Once when you buy it, and again when your disposing of excess.
  - 14 gallon lab pack = \$225 or \$16 per gallon
  - 55 gallon bulk = \$150 or \$2.74 per gallon

THE LESSON HERE IS TO MINIMIZE PURCHASES!

## YOU MAY BE A SATELLITE ACCUMULATION SITE...

- If you generate any hazardous waste in your lab or worksite, you are a "Satellite Accumulation Area" and required by the EPA to adhere to certain regulations.
- Noncompliance with any hazardous waste regulation may result in substantial fines and penalties for the University or individual investigators.

## SATELLITE ACCUMULATION

- Before you start, label the secondary container and make sure the container is the proper container to use for storing the waste (see next slide).
- Once a chemical is designated a "waste" or when the first drop of waste has been put into the container, a "hazardous waste" tag must be completed, dated, and placed on that container.
- Wastes can only be accumulated for <u>up to one year</u>.
- EH&S must be notified for pick-up when containers are <u>¾ full</u> and prior to the one year accumulation date.



#### Chemical Waste Collection and Turn In

- The container must be marked "Hazardous Waste" with the accumulation start date or properly tagged.
- Transfer materials only inside fume hood.
- Containers must be kept tightly closed unless adding waste.
- Store in designated "Satellite Accumulation Area".
- Segregate waste by chemical compatibility.
- Keep waste in secondary containment.
- Inspect daily for signs of damage to containers, labels or leaks.
- Arrange for waste pickup when containers are <sup>3</sup>/<sub>4</sub> full or close to one year from accumulation start date.
- For waste pickup contact EH&S at safety@mail.ecu.edu or 328-6166.



Clean up all spills promptly.

## THE FOUR "L'S" OF SATELLITE ACCUMULATION

- Lids: Keep containers tightly closed. Open containers <u>only</u> when adding waste.
- Labels: Tag containers before using for waste collection.
- <u>Leaks</u>: Inspect waste containers weekly for leaks. Residue on outside of a container is considered a discharge by EPA. Keep containers clean.
- <u>Location</u>: Collect waste at or near point of accumulation in a secondary container. Segregate by compatibility.

\*\*Remember label vacuum flasks "used" and its contents, not "waste"

### HAZARDOUS WASTE FUNNEL USE

- Safety funnels can be used if they meet the following conditions:
  - The funnel is secured to the container.
  - The funnel has a gasket and locking devices on the lid.
  - It is kept closed when not in use.
  - The funnel has a one way valve to prevent spills and emissions.

## UNKNOWN CHEMICALS/WASTE

 It is the department's responsibility for covering the costs of dealing with unknowns.

- Identification, removal, safe disposal.

- Any chemical that does not have a label and cannot be identified Is referred to as unknown
- Place on the Pick-Up Request Form.
  - Include amount and any identifying characteristics.
- ECU's Chemical Contractor will have to retrieve the chemical and an identification analysis will be conducted.

## HAZARDOUS WASTE LABELING

- All Hazardous Waste containers must be properly labeled with EH&S tags.
  - If the chemical is in its <u>original</u> container and the label is not damaged, then the container does not need a hazardous waste tag.
- DO NOT use chemical formulas or abbreviations.
  - Full chemical names ONLY!!
- Tag must show all the chemical constituents by percent.
- Make sure to sign the generator's signature when the tag is applied to the container.
- The Accumulation Start Date MUST be completed on the tag when the 1<sup>st</sup> drop of waste enters the container.
- Attach the tag to the container with string, wire or rubber band.
- Inspect label integrity and replace if damaged or stained.
- Do not tag containers that are empty, wait until the first drop has been entered into the container.

#### ENVIRONMENTAL HEALTH & SAFETY HAZARDOUS WASTE TAG. ATTACH TO – WASTE WITH A RUBBER BAND, WIRE, OR STRING.

#### Hazardous Waste

For any questions or comments please contact Environmental Realth and Safety at 318-6166

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Investigator/Generator	Phone Num ber	
Bldg. & Rm. No.	Dept.	
Accumulation Date	EHS USE ONLY	
Contents: 10n abb reviseed Chemical Some)		%
		100%
Amount(L, gal., kg, Ibs.)		
Generator Signature		
No. 000001		

## HAZARDOUS WASTE DISPOSAL

- Ensure that wastes are properly packaged and labeled.
  - Containers with residues, cracked lids, damaged containers, unknowns, or leaking containers will not be collected, and will be left in the lab.
- Complete the waste pick-up request form from EH&S web page and email to safety@ecu.edu.
- Provide your name, phone #, location, identity, and amounts of waste.
- Waste pick-ups are conducted every Thursday.

### DRAIN DISPOSAL

- Must have EH&S approval before drain disposal occurs.
- Must comply with EH&S and GUC requirements.
- Any approved disposal must be logged on the Drain Log.
- pH has to be between6 and 9.



## WASTE MINIMIZATION

- Find a non-hazardous alternative to the hazardous material you are obtaining.
- Practice Inventory Control: Use it all before looking for more.
- Recycle/Recover all materials possible.
- Reduce waste and unnecessary purchases.
- Teach waste minimization as part of lab instruction.



## EMPTY CONTAINER RULES

- To dispose of "empty" containers in the trash, they must meet the following criteria:
  - Contain no radioactive materials or biological wastes.
  - Was **not** a container for acutely toxic chemicals.
  - Has less than or equal to 3% by weight of its total capacity.
  - All content in the container has been collected, recovered or used. No content should be able to immediately spill out if held upside down.
  - Non acutely toxic chemical containers should be triple rinsed.
  - Labels on the containers for disposal should be removed or defaced and the container should be labeled "EMPTY".
  - Containers for disposal are in the appropriate refuse area with lids removed.

## IN THE EVENT OF A SPILL

- If the spill represents an increased risk of exposure to you or others, GET HELP!
- Leave the area, close all doors and call for assistance
- if any of the following occur:
- A fire or potential for a fire dial 911.
- Serious injury or a hazardous chemical exposure dial 911.
- The spill is beyond your ability to control call EH&S (328-6166).
- The spill has left the immediate area or threatens others areas - call EH&S (328-6166) or 911.
- Unknown materials are involved call EH&S (328-6166).

## WHEN REPORTING A SPILL...

#### Call Environmental Health & Safety at 328-6166.

- State your <u>NAME</u>.
- Give your <u>EXACT LOCATION</u> (Building and room #).
- Explain the <u>CHEMICAL SPILLED</u> (type, concentration, and quantity).
- Describe any <u>SPECIAL CIRCUMSTANCES</u> that may be involved.
- Leave a <u>PHONE NUMBER or SPECIFIC LOCATION</u> where you can be reached.

Stay safely nearby to meet EH&S/emergency personnel.

## QUESTIONS AND QUIZ

- Contact Environmental Health & Safety at 328-6166 or safety@ecu.edu.
- For Radiation/Biological Safety Information Contact the Office of Prospective Health at

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744-2070.

