

FAO 9.02pr - HAZARDOUS WASTE MANAGEMENT PROCEDURES

SCOPE

Edmonds Community College (EdCC) is required to establish policies and procedures to manage hazardous materials and waste. This is to ensure the safety of employees, students, volunteers, visitors, and vendors that assist the college in day to day operations, as well as ensure proper disposal of hazardous waste in compliance with regulatory requirements, reduce disposal costs, ensure good stewardship of the environment, and help protect against liabilities, regulatory citations and fines. All hazardous waste is to be managed, handled, and disposed of in accordance with applicable regulations, including [WAC 173-303](#)

This procedure applies to all staff, students, volunteers, vendors and visitors and is in place to ensure that all hazardous waste generated is properly identified, designated and managed.

SUMMARY:

Waste Minimization: It is preferable not to create waste in the first place. Steps can be taken to reduce or eliminate waste by planning procedures that use less toxic chemicals, by using micro-techniques, or by recycling unwanted chemicals among other campus chemical users with proper labeling and documentation.

Storage: Hazardous waste must only be stored in two designated areas on campus. One area is the "Hazardous Waste Storage" in the Cedar Building, and the second is called a "Satellite Accumulation" area. Strict storage quantities, procedures, labeling, record keeping, and storage time limits apply to both of these areas. They are regulated by the State of Washington's Department of Ecology, and WAC 173-303.

Labeling: Specific hazardous waste labeling is required for waste containers, storage areas and transport vehicles. (see Detailed Procedures, item 3)

Hazardous Waste Coordinator (HWC): EdCC appoints and trains a Hazardous Waste Coordinator to properly manage the handling, storage and disposal of hazardous waste. The HWC appointed for EdCC is the Environmental Health & Safety (EHS) Program Coordinator in the EHS/Recycle Department and can be reached at 425-640-1934

Record keeping: Strict record keeping requirements for manifests, inspections, storage quantities and limits are required. (see Detailed Procedures item 10)

Inspections: Periodic inspections of waste storage areas are required.

Disposal: Disposal methods are strictly regulated. Employees will not dilute or evaporate chemical waste or place down sink drains as a disposal method. Hazardous waste generated at EdCC must be disposed of through the State's licensed hazardous waste contractor.

Shipment: As hazardous wastes are highly regulated, hazardous waste pick-ups and transport are to be arranged only through the campus EHS Program Coordinator. The EHS Program

Coordinator must be present to oversee waste pick-ups, to sign the contractor shipping papers (manifests), and ensure proper handling, packing, and labeling of the waste. (see Detailed Procedures item 8)

Training: Training is required for hazardous waste generators and those involved with handling, storing and shipping of hazardous wastes. See [WAC 173-303-330](#).

Training must teach personnel to

- perform duties in compliance with WAC 173-303;
- perform dangerous waste management procedures relevant to the positions in which they are employed;
- respond effectively to emergencies.

Ensuring employee training and maintaining records of training that meets this requirement is the responsibility of the supervisor.

PROCEDURE DETAILS:

RESPONSIBILITIES

1. **College leadership, administrators, and work area managers/supervisors:**
Administrators, work area managers and supervisors whose administrative units use, generate, store, or otherwise impact hazardous materials and waste are responsible for:
 - a. Monitoring the work area(s) for which they are responsible to assure these procedures are in place and maintained.
 - b. Assuring that all areas that purchase, handle, or generate hazardous materials and waste have qualified hazardous waste handler support.
 - c. Providing employee training programs that ensure compliance with WAC 173-303.
 - d. Developing a written training plan ([example](#)) for all hazardous waste handlers that includes the following documents and records:
 - i. Documented job title, job description, and name of employee filling each job. Job description must include requisite skills, education, other qualifications, and duties for each position.
 - ii. Written description of the type and amount of both introductory and continuing training required for each position.
 - iii. Records documenting that facility personnel have received and completed the training required. Training records must be maintained at the facility on current personnel until closure of facility, and former employee training records must be kept at least three years from date last worked at the facility.
2. **Facilities Department** is responsible for reviewing this procedure annually and establishing and implementing updates as regulations and safety standards change. The EHS Program Coordinator is responsible for assisting departments by collecting, designating, recycling, and disposing of chemical waste. The EHS Program Coordinator provides departments with information on waste minimization and instructions for preparing chemical wastes for recycling or disposal.
Tasks include:
 - a. Maintain training and certification required to meet regulatory requirements, and

- implement program.
 - b. Review and recommend updates to this regulation annually and implement procedures to ensure regulatory compliance.
 - c. Designate waste, following all applicable regulatory requirements and the guidelines of this regulation, and ensure appropriate hazardous waste labels are attached to all waste materials.
 - d. Coordinate all off-site waste transportation and disposal arrangements:
 - i. inspect condition of transport vehicles prior to loading waste for offsite shipment.
 - ii. Complete, sign and maintain copies of hazardous waste manifests.
 - iii. Complete, sign and maintain copies of Land Disposal Restriction Certifications for each manifested shipment.
 - iv. Assure the return of the signed original manifest within 45 days.
 - v. Complete, sign and maintain copies of all records for five years on all biohazardous waste, regulated waste and non-hazardous waste for the college.
 - e. Order and maintain an adequate supply of waste containers, waste labels, Personal Protective Equipment (PPE), and other related supplies for managing hazardous waste.
 - f. Collect and transport waste from Satellite Accumulation Areas to the Waste Accumulation Area.
 - g. Verify that weekly inspections of Hazardous Waste Accumulation Areas are being performed and documented.
 - h. Prepare and submit annual Hazardous Waste Reports to the Washington State Department of Ecology.
 - i. Log waste into the Waste Accumulation Area and maintain current records in accordance with regulations.
 - j. Ensure all waste containers in the Waste Accumulation Area are dated with accumulation start date.
 - k. Keep manager apprised of program status and arrange for the disposal or recycling of waste in accordance with regulations.
 - l. Ensure that the assigned Waste Accumulation Area is in compliance with all applicable regulations.
 - m. Maintain current spill response plan for accumulation area.
3. **Hazardous Waste Handlers** are anyone on campus who purchases or generates a material classified as hazardous waste and are responsible for compliance with all relevant regulations, policies, and procedures related to the safe handling, storage, and containment of hazardous materials in their work areas. They must:
- a. Maintain training and certification required to meet regulatory requirements, and implement procedures indicated in this program.
 - b. Ensure safety, persons with access to hazardous waste materials must have adequate supervision and guidance at all times.
 - c. Coordinate with the EHS Program Coordinator on implementation of the required storage and disposal procedures.
 - d. Maintain waste accumulation areas in compliance with all regulations.
 - e. Ensure waste generated in the work area is properly stored and labeled.
 - f. Ensure a completed label (see Detailed Procedures, item 3) is attached to each

container containing any amount of hazardous waste. Labels and assistance can be acquired from the EHS Program Coordinator.

- g. Ensure Safety Data Sheets (SDS) accompany all waste streams generated per container. Indicate discontinued materials and locations where no longer in use to the EHS Program Coordinator at time of pick up.
 - h. Arrange for the disposal or recycling of waste when containers or accumulation area are nearing capacity by generating a Facilities Department work order request ([Work order request link](#)) for pick up. Coordinating details with the EHS Program Coordinator is required.
 - i. Ensure that an adequate supply of waste containers, labels, and other related supplies needed for handling and managing waste generated in the work area are available.
4. **Employees, Faculty, and Students.** All employees and students must follow all applicable procedures as specified within this regulation when handling and disposing of hazardous waste.

REQUIRED PRACTICES

1. All chemical waste and process waters shall be considered suspect hazardous waste until designated otherwise by the EHS Program Coordinator.
2. Materials listed on the [Waste Stream list](#) are managed as hazardous waste. Intentional disposal of these materials by any of the following methods is not allowed:
 - a) pouring down the drain
 - b) pouring onto the ground
 - c) placing in the common trash or recycling containers
 - d) evaporation
3. Specific waste that does meet EdCC treatment criteria will be managed as hazardous waste. Those that do must be neutralized, and meet all the requirements of regulatory agencies, with a complete [disposal log](#) maintained. Log must include hazardous waste handler name, date, amount, and method of disposal used.
4. No smoking, eating, drinking or storage of food, medication or tobacco products is permitted in chemical or waste handling areas.
5. Materials labeled as hazardous waste shall be handled only by trained hazardous waste handlers.
6. Only trained, HM-126F certified, employees shall be involved in activities directly associated with the shipment of hazardous waste. Training to be renewed annually.
7. All areas where waste is accumulated must be provided with secondary containment that prevents the accidental release of hazardous materials. Secondary containment must remain clean and dry at all times.
8. All containers that hold flammable raw material or waste must be stored in an approved

flammable materials storage cabinet that is electrically grounded and has self-closing doors, or within an approved flammable materials storage room when not in use.

9. In Waste Accumulation Areas, a minimum aisle space of 30 inches is required between rows of waste. A row of containers must be no more than two containers wide, except along a wall where a row must not be more than one container wide.
10. Incompatible waste materials must remain separated at all times and may not be stored in such a way that accidental commingling could occur.
11. Good housekeeping shall be maintained in all waste accumulation areas.
12. Weekly inspections are required for all areas where containers are stored to ensure no leaking or deterioration of the containers or the containment system has occurred. An inspection log is required including at least the date, time of inspection, printed name and handwritten signature of inspector, notation of observations, date and nature of repairs or remedial action taken. Log must be maintained at the facility for at least five years.
13. At no time shall a container larger than five gallons, or total accumulation greater than 55 gallons, of waste be allowed to accumulate in a Satellite Accumulation Area.
14. All sharps must be contained in an approved, puncture-proof container prior to proper disposal by an approved bio-waste disposal company and all manifests must be kept on file a minimum of five years.

DETAILED PROCEDURES:

1. General Waste Handling Procedures.

- a. Appropriate PPE shall be worn during all handling and transporting of waste as determined by the hazards of the material. At a minimum, approved safety glasses and appropriate gloves shall be worn.
- b. Transportation of materials must be placed in secondary containment.
- c. Transfer of waste from open containers shall be performed under a fume hood or within a well-ventilated work area. If, during transfer, a strong chemical reaction occurs (fumes, vapors), immediately stop, evacuate and cordon off the area; contact an appropriate hazardous waste handler and notify the EdCC Security Officer on duty.
- d. Hazardous waste shall not be mixed without prior approval by a trained hazardous materials handler and the EHS Program Coordinator. If unauthorized mixing of waste is suspected or known to have occurred, immediately contact the EHS Program Coordinator for evaluation.

2. General Requirements for Waste Containers.

- a. All containers which previously held acidic or basic liquid materials must be triple-rinsed before disposal.
- b. All clean, empty containers must have the label and all other markings removed or defaced prior to disposal.
- c. All containers which held hazardous chemicals and still contain even trace amounts of chemical must be handled as hazardous waste.
- d. All containers with a capacity of one quarter inch or greater which contained material that heavily coats the container walls will be handled as hazardous waste.
- e. All waste containers shall be in good general condition; free of cracks, holes, dents, leaks, bulging, corrosion, or other defects or deterioration. The outside of containers shall be free of chemical contamination.
- f. Leaking containers shall be placed into a closed secondary container or the contents repackaged.
- g. Waste containers, empty or otherwise, shall never be stored outdoors.
- h. Containers shall be compatible with the waste material to be placed into them.
- i. All waste containers shall be tightly closed except when material is being added or removed. All closures must be adequate to prevent leakage or other release.
- j. Waste containers shall not be filled to capacity. A minimum 10% head space is required and five inches of headspace is required for a 35 gallon drum.
- k. A [Waste Accumulation Log form](#) shall be maintained for each container of waste in the Waste Accumulation Area.

3. **Labeling of Hazardous Waste Containers.**

- a. Each waste container must have a [Hazardous Waste Label](#) attached to it and be properly and legibly identified with, at minimum, the words "Hazardous Waste" prominently displayed on the container, a description of the material, and the primary hazard of the material. For waste held in the Waste Accumulation Area, the accumulation start date is also required.
- b. All other markings must be removed or defaced prior to affixing hazardous waste labels on a container.

4. **Waste Sampling and Protocol for Analysis.**

- a. Sampling methods used to designate suspect hazardous waste shall be those that

comply with the regulations of the Washington State Department of Ecology (DOE).

- b. Composite samples shall be used whenever possible.
- c. Initial sampling of waste for designation shall be performed within five working days of notification of generation.
- d. Analytical laboratories will conduct all required testing, according to the requirements of [WAC 173-303-110](#). EPA certified laboratories are recommended.

5. Waste Designation.

- a. Methods used to designate waste materials shall be acceptable to the WDOE and shall follow the procedures of [WAC 173-303-070](#) through 104.
- b. All hazardous waste shall be designated before disposal.
- c. Re-evaluation of waste stream designation shall be repeated upon vendor request, when a change in the process generating the waste occurs, or at minimum annually.
- d. Some materials in original containers may be designated using the SDS for the material. Consult the EHS Program Coordinator to verify.
- e. The results of waste designation shall be recorded in the Profile file for the waste.

6. Containers Whose Contents are Unknown.

- a. If the contents of a container are unknown, do not handle, move or otherwise disturb the container.
- b. Do not add any additional material to the container.
- c. Contact the EHS Program Coordinator to schedule sample analysis by approved method, and disposal.

7. Waste Accumulation Area Inspection.

- a. Weekly inspections are required of all areas where containers are stored to ensure no leaking or deterioration of the containers or the containment system has occurred. A [Weekly Waste Area Inspection form](#) is required including the date, time of inspection, printed name and handwritten signature of person performing the inspection, notation of observations, date and nature of repairs or remedial action taken. Log must be maintained at the facility for at least five years.
- b. The inspection log shall be maintained within the Waste Accumulation Area for reference by area personnel.

- c. Deficiencies which present a hazard are communicated to the hazardous waste handler(s) who is responsible for the accumulation area.
- d. All documented deficiencies must be corrected within an appropriate time frame. Completion of corrective actions must be verified on the inspection form with date and initials.

8. Hazardous Waste Shipments.

- a. The accumulation time shall not exceed 180 days for total waste quantities under 2200 pounds in the Waste Accumulation Area.
- b. Prior to shipment vented bungs or fill gauges on drums must be replaced with a non-vented bung, and containers must be sealed and leak-proof.
- c. Waste shipments shall be prepared and performed in accordance with Department of Transportation and applicable destination state regulations.
 - 1) All hazardous waste shipments shall be documented with a hazardous waste manifest
 - 2) A Land Disposal Restriction Certification shall be completed for each manifested waste shipment.

9. Hazardous Material Spills. In the event of a hazardous material spill, do the following:

- a. Safety is the first consideration. Never do anything that places yourself or others at risk.
- b. If qualified, contain the spill if possible.
- c. If safe to do so, identify the spilled material(s), retrieve corresponding SDS and provide to response team.
- d. Contact the area supervisor, appropriate hazardous waste handler, who in turn shall notify Security. If the area supervisor is not available, contact Security directly.

10. Records.

- a. Manifest, non-hazardous, regulated, e-waste, bill of lading, and land disposal restriction certificates shall be kept by the Facilities Office. These records shall be retained indefinitely.
- b. Operating records shall be kept by the Facilities Office. These records shall be retained indefinitely.
- c. Inspection records shall be kept by the Facilities Office. These records shall be retained indefinitely.
- d. Profiles shall be kept by the Facilities Office. These records shall be retained

indefinitely.

DEFINITIONS

1. **Designated Waste.** Material which has been shown to be either a dangerous or extremely hazardous waste regulated by the Environmental Protection Agency or the Washington State Department of Ecology.
2. **DOT.** Department of Transportation.
3. **DOE.** Department of Ecology
4. **Drumcode.** A sequential three-letter code assigned to waste containers placed in the Waste Accumulation Area for identification and tracking purposes.
5. **Empty Container.** A container in which any residual material amounts to less than 1% of the container capacity.
6. **EPA.** Environmental Protection Agency
7. **Exempt Waste.** Material which, after subjection to the designation process, is shown to be unregulated by the EPA or DOE.
8. **HM-126F Certified Employee.** Employee trained and certified in accordance with the DOT Docket HM-126F.
9. **Hazardous Waste Handlers.** Employee specialists with job responsibilities that require the use, handling, or management of hazardous waste generating materials, and have received training as required by WAC 173-303-330.
10. **Profile.** Summary of the composition and physical properties of a waste determined by chemical analysis or process knowledge or a combination of both.
11. **Satellite Accumulation Area.** All hazardous waste generation areas not specifically defined as a Waste Accumulation Area which meet the following criteria: under the direct control of the operator, at or near the point of waste generation, and where less than 55 gallons of waste is accumulated at one time.
12. **Secondary Containment.** A barrier that would prevent spilled or discharged material from reaching the environment during the time it takes for the spill or discharge to be cleaned up. Containment must be adequate to contain 110% of the contents of the largest container or 10% of the total amount of material stored, whichever is greater.
13. **Sharps.** Items such as broken glass, used syringes and razor blades that present a hazard to the custodial staff.
14. **TSDF:** Treatment, Storage and Disposal Facilities.

15. **Triple-Rinse.** Cleaning of containers by rinsing each container three times with an appropriate cleaner or solvent prior to disposal. Volume used for each rinsing must be at least ten percent of the container's capacity. Rinsate used must be managed as a hazardous waste.
16. **Waste Accumulation Areas.** Designated area for temporary accumulation of hazardous waste collected from Satellite Accumulation Areas prior to shipment to an approved TSDF. Cedar Building, Bay 4 is the waste accumulation area for the EdCC campus.

RELATED POLICIES AND PROCEDURES

FAO 1.01pr – Pollution Control: Procedures

FAO 5.02pr - Hazard Communication Program: Procedures (replaces C6.5.100 R102)

SOURCE INFORMATION

Compliance Mandates:

Washington State "Dangerous Waste Regulations": WAC 173-303

Department of Transportation: Hazardous Materials Regulation [CFR 49, Subchapter C](#)
Parts 171-177

Training Requirements for Transportation of Hazardous Materials: [CFR 49 172.704](#)

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Vice President for Finance and Operations

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