

Valencia College

Manual for Handling, Marking and Disposal of Chemical Hazardous Waste and Non-Regulated Waste in Custodial, Grounds and Trades Departments

Revised: May 17th, 2011; Revised 4/16/2012.

Purpose of Training and Manual

To provide the college employee that works in the Plant Operations Department setting with an overview of the federal regulations, state laws and college policies and procedures relating to handling and disposal of chemical hazardous and non-regulated waste. The training will establish a college wide uniform approach and requirements for hazardous waste management regardless of the employee's campus location.

Regulations, Policies Procedures

The information in this manual is extracted from federal and state regulatory requirements, the College Safety Management Manual and current college policies and procedures.

Who is required to be trained?

Any employee who handles chemicals or chemical waste that is generated by the Plant Operation Departments located at any of the college's campuses or properties.

What are we required to be trained on?

40CFR 262.34(d)(5)(iii) states: The generator (College) must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies.....

Generator Status

A site or campus is considered the geographical location where the hazardous waste is produced.

There are three classifications of Generator Status: Large Quantity, Small Quantity (West Campus and East Campus) and Small Quantity-Conditionally Exempt (Osceola and Lake Nona).

A site's generator status is determined by how many pounds per month you ship from your site.

All waste produced on a site must be shipped off of that site.

How to determine what is a Hazardous Waste

The first step in determining if your chemical is hazardous is to identify the hazard classification and characteristics of the chemical you are dealing with. If your chemical is a flammable, corrosive, poison, oxidizer, or reactive it should be considered hazardous. Examples of hazardous waste are spent gasoline, diesel fuel, parts cleaning fluid, mineral spirits, fertilizer, insecticide, pesticide, transmission fluid and aerosol cans. If in doubt, call the Compliance Office for assistance in determining if your chemical substance is considered hazardous.

What is a waste chemical?

A waste chemical is simply a chemical that will no longer be used and serves no more purpose in the business setting.

Labeling and Marking of hazardous waste chemical containers.

All hazardous waste chemical containers will be labeled. The container label will include the chemical name in language form (example: Gasoline) and the container will be marked in permanent marker with the Accumulation Start Date (ASD). The ASD is simply when the container started to hold hazardous waste chemicals.

Labeling and Marking of Non-Regulated waste chemical containers.

Used Oil containers (regardless of size) used to hold and store waste used oil shall be marked with the appropriate DOT label. Drums containing waste used oil shall be stored inside a building and be provided with secondary containment. All used oil containers labels shall be marked in permanent marker with the Accumulation Start Date (ASD). Used oil containers shall not be stored on property for more than 360 days.

Used Oil Filters containers (regardless of size) used to hold and store waste used oil filters shall be marked with the appropriate DOT label. Drums containing waste used oil filters shall be stored inside a building in a leak proof container. All used oil filter containers labels shall be marked in permanent marker with the Accumulation Start Date (ASD). Used oil filter containers shall not be stored on property for more than 360 days.

Universal Waste (Batteries and Lamps) containers (regardless of size) used to hold and store Universal Waste shall be marked with the appropriate label. Containers holding Universal Waste shall be sound and undamaged and shall be stored inside a building. All Universal Waste Container labels shall be marked in permanent marker with the Accumulation Start Date (ASD). Universal waste containers shall not be stored on property for more than 360 days. Containers holding fluorescent light bulbs shall be marked with the words "Contains Mercury".

Hazardous Waste Chemical Inventory:

A "running" active inventory of all hazardous waste chemicals shall be maintained at all times. This is documented on the colleges "Hazardous Waste Disposal Form" included in this manual. All hazardous waste containers shall be marked and numbered in consecutive order and required information noted on the Hazardous waste Disposal Form.

Disposal cycle: 180 days (West Campus and East Campus) or 360 days (Osceola Campus and Lake Nona).

Disposing of Chemical Waste

Attached is the college's "Hazardous Waste Disposal Form" recording hazardous waste. This form is used to keep the running active inventory of the hazardous waste you have on hand at your location. The form is also used to submit to the college's waste disposal company to obtain quotations for disposal of chemical waste. Please list the waste containers chemical composition horizontally on the form. Remember, hazardous waste must be disposed of within 180 days of the accumulation start date listed on the container. Also, hazardous waste must be disposed of from the campus or site at which it was generated; East, Osceola and West campuses.

Storage of chemical hazardous waste

Like all other chemicals, hazardous waste chemicals should be stored in proper containers and locations. If needed, check the chemical's material safety data sheet to verify proper handling and storage requirements. The DEP Weekly Inspection Logs should be filled out for each location where hazardous waste chemical are stored. Please retain this form for 90 days following the disposal of the chemicals listed on this form.

Contingency Plans:

These are required by federal and state regulations. They shall be maintained by each department or area that handles and produces chemical hazardous waste. Contingency Plans will be reviewed annually by the Superintendent of Plant Operations to ensure all information is current and accurate.

Follow up internal audits and inspections

At least once every four months, the college will conduct a formal regulatory audit and inspection of Plant Operations areas that contain hazardous waste and Non-Regulated waste. This regulatory audit will check for compliance with required federal and state regulations and college policies and procedures as they relate to the handling and disposal of chemical hazardous waste.

The regulatory audit will be documented and forwarded to Superintendent of Plant Operations. If required, corrective action will be taken and documentation forwarded to the Assistant Vice President for Facilities for his or her review. After review, the Superintendent of Plant Operations will forward a copy of the corrective action regulatory audit to the Compliance Office. If necessary, a follow up inspection may be conducted to verify correction and compliance. Additionally, informal (non-documented) audits and inspections may be conducted by the college's Compliance Office.