

# EHS Guidance

## Hazardous Waste Program Revisions

### Purpose

Program guidance provided in this document is intended to ensure compliance with recent changes in state and federal regulations, improve safety and help protect the environment. These program revisions are effective immediately. Please read the whole guidance sheet before proceeding with accumulating and managing chemical waste under this new rule in order to save time and avoid potential problems.

### Background

In November 2016, the US Environmental Protection Agency (EPA) promulgated new rules pertaining to hazardous waste management. Subsequently, the Idaho Legislature adopted these rule changes that became effective in Idaho in 2018.

The primary impact on U of I generators of hazardous waste involves labeling of containers and safe storage in a designated satellite accumulation area. Previously, a generator could simply label waste containers with their contents (e.g., Spent Flammable Solvents). Now, a generator must mark or label all containers of waste with the words “Hazardous Waste,” and an indication of the hazards of the contents (e.g., Ignitable, Corrosive, Reactive, or Toxic)

A container holding a hazardous waste that is incompatible with any waste or other materials accumulated nearby in other containers must be separated from the other materials or protected from them by any practical means. EHS interprets this provision as requiring the use of secondary containment such as lab trays or tubs or built-in containment such as in a storage cabinet or fume hood.

### Procedure

1. Before adding waste to a container, affix and fully complete a Hazardous Waste Label provided by EHS (see example on the right). Be sure to indicate the waste constituents and their (estimate if necessary)



concentrations. Hazardous Waste Labels are available online on the EHS website, in Chem Stores, Biology Stores or by contacting EHS. The “Container #: \_\_\_\_” section in the upper right-hand part of the label is to facilitate linking the waste container to its accumulation log sheet as required. Once a waste bottle has been submitted, the computer-generated hazardous waste label will still need to be attached to the container because it has the tracking number that EHS uses to track waste containers.

2. Store both in-progress (if practical) and full waste containers in secondary containment tubs or trays away from sinks or floor drains. Most chemical storage cabinets have built-in containment (a sump or molded tray). If this is the case, you still need to store incompatible waste in separate tubs or trays. Hazardous waste should **NEVER** be transferred between rooms.



3. Store full waste containers in the designated “Satellite Accumulation Area,” now identified by the poster below. An SAA is a location at or near the point of waste generation where up to 55 gallons of waste or 2.2 pounds of acute hazardous waste can be stored. If you are uncertain if you have generated an acute hazardous waste, please refer to the [list on the EHS website](#). If you think you are approaching the 55 gallon or 2.2 pound limit, please notify EHS immediately at 208-885-6524.

## Hazardous Waste Satellite Accumulation Area

1. Label/mark all containers with the words “Hazardous Waste” and indicate the hazards. Remove conflicting labels.
2. Properly identify, list and quantify all constituents added to containers. Keep a log of waste additions.
3. Keep containers closed except when adding waste. Use tight-fitting, screw-cap lids.
4. Ensure containers are in good condition and compatible with waste. Do **NOT** combine incompatible wastes!
5. Store full containers in the designated Satellite Accumulation Area at or near the point of generation. **Keep quantities below 55 gallons of waste or 1 kg (2.2 lb) of acute hazardous waste; if exceeded, call EHS at once.**
6. Store waste containers by chemical compatibility in separate trays or tubs.
7. **Preparedness:** All SAAs must have access to a: **FIRE ALARM, FIRE EXTINGUISHER, SPILL KIT, COMMUNICATION DEVICE** (Telephone or Two-Way Radio), **EMERGENCY SHOWER/EYEWASH**; and staff must maintain adequate **AISLE SPACE**. Post and know the location of **EMERGENCY EXITS** and the **BUILDING EVACUATION ROUTE**.

TABLE 1 – Emergency Procedures

| Chemical Spill – Minor (See also EHS Guidance: Chemical Spill Clean-up Procedures) | Chemical Spill – Major                           | Fire, Explosion, or Spill threatening life/health outside of building/lab: |
|--|--|--|
| 1. Wear appropriate PPE and protect/cover floor drains                             | 1. Evacuate area, isolate area and prevent entry | 1. Pull Fire Alarm and evacuate the building                               |
| 2. Stop/Cover the spill to prevent spreading                                       | 2. <b>Call 911</b>                               | 2. <b>Call 911</b>   |
| 3. Alert others of the spill   | 3. Call EHS at 208-885-6524                      | 3. Call EHS at 208-885-6524  |
| 4. Decontaminate   |  |  |
| 5. Dispose cleanup materials & contaminated debris as Hazardous Waste              |  |  |

University of Idaho

Environmental Health & Safety (EHS)  
Contact EHS at 208-885-6524; [www.uidaho.edu/ehs](http://www.uidaho.edu/ehs)

If you are using chemicals that are designated as acute hazardous waste, EHS has prepared a Laboratory Guidance Sheet on Managing Empty Containers of Acute Hazardous Waste. Please refer to the [EHS Guidance](#).