WESTERN CONNECTICUT STATE UNIVERSITY

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HAZARDOUS WASTE SATELLITE ACCUMULATION AREAS

PROCEDURE E-103

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Please direct any questions or comments about the applicability of this document to Luigi Marcone, WCSU Department of Public Safety

1.0 INTRODUCTION

2.0 PURPOSE

This procedure establishes the Western Connecticut State University (WCSU) Hazardous Waste Satellite Accumulation Area Program and the maintenance of these areas. This program will prevent the overaccumulation of hazardous wastes in laboratories or other waste generating areas and allow for the expedient removal of wastes from the WCSU campuses.

3.0 APPLICATION

These guidelines apply to all WCSU employees, who, by the nature of their work assignments, generate hazardous waste*, and students, who through the course of their respective class requirements, generate hazardous waste*.

4.0 AUTHORITY

Title 19A General Statutes of Connecticut
Title 40 Code of Federal Regulations

5.0 PROGRAM

5.1 SATELLITE ACCUMULATION AREAS

The following areas have been designated as satellite accumulation areas and must comply with these and any other applicable requirements: all University laboratories, prep rooms, storage areas and research rooms in Higgins Hall have been classified as satellite accumulation areas. Additionally, the following specific areas have also been classified:

- Health services (biomedical and pharmaceutical waste only)
- Nursing labs in White Hall (biomedical waste only)
- Photography labs and dark rooms (WH323 and SC212)
- Art studios which use hazardous materials (WH005, 028, 337, 338)
- Westside maintenance garage
- Lithography studio (WH321, 322)
- Laboratories and Science Classrooms
  - HA003, 016, 101, 110, 112, 114, 116, 201, 202, 204, 210, 213, 214, 215
  - HI102, 105, 105A, 115A, 115B, 205B
- Lockshop OM006

5.1.1 MONTHLY INSPECTIONS

The above mentioned areas will be inspected on a monthly basis by a designee of the Health, Safety, and Environmental Affairs Department. All inspection items will be checked and any corrective measures taken must be noted in the appropriate area.

5.1.2 RECORD KEEPING

Inspections will be documented and records reflecting that inspection will be kept in a binder near each SAA and immediately available. At the end of each calendar year, inspection records will be collected and archived.

Satellite accumulation areas have been provided with a polyethylene tray. Sealed and labeled waste containers are to be placed on the trays. If large quantities of waste are anticipated due to a lab clean out or large scale work, please make prior arrangements with the Director of Health and Public Safety Management at 837-9314.

5.2 MAIN ACCUMULATION AREAS

The university has designated a main accumulation area for hazardous waste. Materials accumulated in the satellite areas are routinely moved to the main accumulation area where they are inventoried, segregated, and packaged according to the requirements of 49CFR part 172.

The area has been equipped with explosion-proof lighting and ventilation systems. Furthermore, the area has been supplied with equipment to facilitate hazardous waste packaging activities.

5.3 LAB PACK DISPOSAL

Lab pack disposal services have been contracted with licensed companies specializing in waste removal activities from universities. Lab pack disposal involves the collection of small containers and the collective packaging of like hazard classes into larger containers. All wastes are taken to licensed incineration facilities specially constructed to accept hazardous wastes, where the entire container is incinerated at temperatures in excess of 1500˚ F.

*See Health, Safety and Environmental Affairs Procedure E-102 “Waste Management Guidelines” for the definition of a waste.

Satellite Accumulation Area Monthly Inspection

Week#: _____, 2004 Satellite Accumulation Location: _____

Inspection Item	Yes	No	Corrective Measures
1. Is area under the control of the individual directly responsible for the process that generates the waste? (40 CFR 262.34(c))			
2. Is the satellite area at or near each specific point of generation where wastes initially accumulate? (40 CFR 262.34(c))			
3. Is the maximum capacity of containers 55 gallons of hazardous waste and/or 1 quart of acutely hazardous waste? (40 CFR 262.34(c))			
4. Are there any waste accumulations in excess of 55 gallons or the amount of acute hazardous waste exceeding 1 quart? (40 CFR 262.34(c))			
5. Is each container marked with the following: (40 CFR 262.34(c)) (a) The words "Hazardous Waste" (b) The chemical names (e.g., acetone, toluene)			
6. Are all containers in good condition (free of rust and/or structural damage)? (40 CFR 265.171)			
7. Are all containers compatible with the waste inside? (40 CFR 265.172)			
8. Are all containers closed unless adding or removing waste? (40 CFR 265.173(a))			
9. Are all waste containers stored in secondary containment bins? (WCSU Policy)			

Inspector: _____ Signature: _____