

HAZARDOUS WASTE MANAGEMENT

REQUIREMENTS SPECIFIC TO SATELLITE ACCUMULATION AREAS (SAA'S)

Background

The EPA and the Kentucky Division of Waste Management (KDWM) have modified or clarified some of the regulations under the Resource Conservation and Recovery Act (RCRA). This document provides guidance for the specific requirements for managing waste in the SAA's where Hazardous Waste may be generated.

Under the Control of the Generator

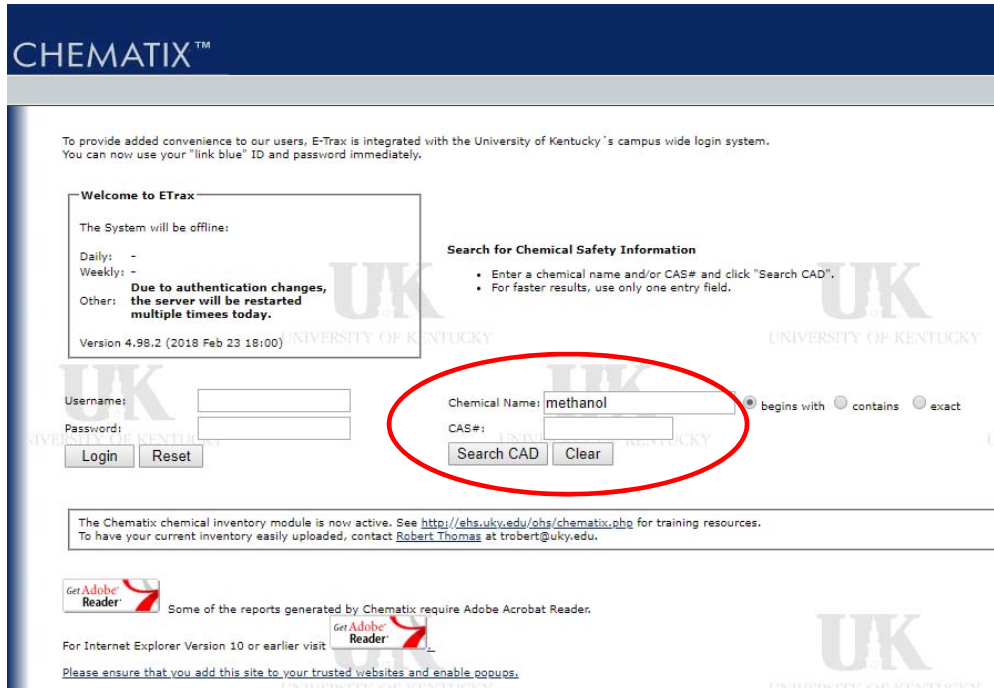
All Hazardous Waste must be under the control of the generator while it is being accumulated. The control may be accomplished by any one or combination of the methods listed:

- Access to the SAA must be controlled by access card, key, or lock box
- Waste is accumulated in a locked cabinet and access to the cabinet is controlled (even if access to the room is not controlled)
- The waste regularly in view of the generators in the SAA during the course of their job
- The generator is able to see if anyone enters or exits the SAA

Waste Determination and Recordkeeping

Accurate waste determination MUST be made at the point of generation (within the SAA) This determination should be made:

- Using the generator's knowledge of the material.
- Utilizing the E-Trax DOT description of the waste constituents. This may be done by entering the chemical name (s) or CAS number (s) on the opening page as shown and clicking "Search CAD":



CHEMATIX™

To provide added convenience to our users, E-Trax is integrated with the University of Kentucky's campus wide login system. You can now use your "link blue" ID and password immediately.

Welcome to ETrax

The System will be offline:

Daily: -
Weekly: -
Other: **Due to authentication changes, the server will be restarted multiple times today.**

Version 4.98.2 (2018 Feb 23 16:00)

Search for Chemical Safety Information

- Enter a chemical name and/or CAS# and click "Search CAD".
- For faster results, use only one entry field.


Username:


Password:

Chemical Name: begins with contains exact

CAS#:

The Chematix chemical inventory module is now active. See <http://ehs.uky.edu/ehs/chematix.php> for training resources. To have your current inventory easily uploaded, contact [Robert Thomas](mailto:Robert.Thomas@uky.edu) at trobert@uky.edu.

 Some of the reports generated by Chematix require Adobe Acrobat Reader.

For Internet Explorer Version 10 or earlier visit 

Please ensure that you add this site to your trusted websites and enable popups.

Then click on the CAS number and the Chemical Abstract (CAD) will open. Scroll through the abstract and note the DOT description as shown:

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DOT Hazardous Material Data

Proper Shipping Name:
 Division(DOT Code): **3 - Flammable and combustible liquids**
 I.D.#(UN Code): UN1230
 Packing Group/Category: II
 Label Code: 0

- Alternatively, after signing in to E-Trax and navigating to the E-Trax waste card creation screen, select the chemical to be placed in the waste container and observe the DOT hazard classification information:

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*****Be sure to add Waste Cards to a Pickup Wo**

To ensure timely pickup of your waste, make sure to add the waste cards to a pickup worksheet. Your waste has not been submitted until that step is completed. The attached link will take you to a user's guide to any questions, please call Brian @ 323-5005.

Created By: **Taylor, Ronald** Phone Number: **859-257-3129**
 Department Name: **Environmental Management** Laboratory / Location: **Select**
 Accumulation Start Date: **01/31/2018** (MM/dd/yyyy) Container Type: **Glass**
 Container Size/Unit: **0.0** / **Select** pH Level: **Select if applicable**
 Physical State: **Liquid**
 Container Full or specify Percentage Full: **90** %

| Chemical Name | DOT Class | DOT Description | CAS Number | Inventory Barcode | Trace Amount | Percent (%) | |
|--------------------------------|-----------|--------------------|------------|-------------------|--------------------------|-------------|-----------------|
| <input type="radio"/> Methanol | 3 | Flammable Liquid | 67-56-1 | | <input type="checkbox"/> | 50.00 | Change Chemical |
| <input type="radio"/> Phenol | 6.1 | Poisonous Material | 108-95-2 | | <input type="checkbox"/> | 50.00 | Change Chemical |
| <input type="radio"/> | | | | | <input type="checkbox"/> | 0.00 | Select Chemical |
| <input type="radio"/> | | | | | <input type="checkbox"/> | 0.00 | Select Chemical |
| <input type="radio"/> | | | | | <input type="checkbox"/> | 0.00 | Select Chemical |

Total Percent: 100.00

Global Hotlist Waste Card Name:





Hotlist Waste Card Name:

- The Safety Data Sheet (SDS) may also be used to determine the hazard classification by referencing section 14 of the SDS.
- Records of this waste determination must be kept at the generating locations for 3 years after the waste was last generated. These records are available in the E-Trax waste management system.

Labeling

Proper labeling of waste accumulation containers must occur at the time and the point where the waste is generated. Utilizing the information recorded as part of the waste determination process, each container must be:

- Labeled with the Hazardous Waste label or other appropriate label such as Non-RCRA Regulated Waste, Used Oil, or Universal Waste.
- Hazardous Waste containers must have hazard warning information indicated. Utilizing the *Hazard Warning Information* shown below and printed on the Hazardous Waste envelope or the hang tag card, check all warning boxes that apply. The primary source of this warning information will be as described above in waste determination utilizing generator knowledge, the E-Trax DOT description, or the SDS. This information must be indicated as soon as Hazardous Waste is introduced into the container and must be present and visible at all times.

| HAZARD WARNING INFORMATION | | |
|---|--|--|
|  |  |  |
| <p style="text-align: center;">IGNITABLE</p> <ul style="list-style-type: none"> <input type="checkbox"/> Flammable Liquid <input type="checkbox"/> Flammable Solid <input type="checkbox"/> Flammable Compressed Gas <input type="checkbox"/> Spontaneously Combustible <input type="checkbox"/> Oxidizer | <p style="text-align: center;">REACTIVE</p> <ul style="list-style-type: none"> <input type="checkbox"/> Explosive Material <input type="checkbox"/> Organic Peroxide <input type="checkbox"/> Dangerous When Wet <input type="checkbox"/> Shock Sensitive <input type="checkbox"/> Cyanide <input type="checkbox"/> Sulfide | <p style="text-align: center;">TOXIC</p> <ul style="list-style-type: none"> <input type="checkbox"/> Poisonous Material <input type="checkbox"/> Poisonous Compressed Gas <input type="checkbox"/> Non-Flammable Compressed Gas <input type="checkbox"/> Metal <input type="checkbox"/> Radioactive Material |
|  | <p style="text-align: center;">CORROSIVE</p> <ul style="list-style-type: none"> <input type="checkbox"/> Acid <input type="checkbox"/> Alkaline | |
| <div style="border: 1px solid black; padding: 5px; display: inline-block;"> <p style="color: red; margin: 0;"><i>Indicate all hazards that apply utilizing generator knowledge, the E-Trax DOT description, and the SDS.</i></p> </div> | | |

- A date must not be placed on the container until it is filled and ready for pick up.
- University policy also requires that the container be labeled with the contents. This can be accomplished by writing the contents on the back of the hazard warning information card, or folded sheet of paper as they are added to the container. The card or paper may be placed in the Hazardous Waste envelope but the hazard warning information must be visible.

Container Management

Containers accumulating waste must be managed in a manner to prevent hazardous conditions. The requirements are:

- Containers accumulating wastes that are incompatible with other waste containers must be separated by any practical means. Some examples of separation are in separate cabinets or utilization of spill trays.
- Containers must be closed at all times unless waste is being added to them. However, a container may be open for temporary venting, proper operation of equipment, or to prevent dangerous situations. Once the temporary condition has passed, the container must be closed.
- Specific caps for containers collecting effluent from HPLC units should be purchased but if these are not available a cap may be drilled so that the tubing will fit into the hole or specific caps purchased. These caps must be changed prior to offering the waste for pick up.
- Once a Hazardous Waste container is ready for pick up, an *E-Trax* waste card must be printed, placed in the waste envelope on the container, and a waste pick up request submitted to the Environmental Management Department (EMD)

Contingency Plans

All SAA's must have a *Contingency Plan Quick Reference Guide* outlining the hazard information for the location and the appropriate emergency response information. Each SAA should use the Quick Reference Guide provided and insure that all occupants are familiar with the information and the requirements. This guide includes:

- Types and names of hazardous waste and associated hazards
- Estimated maximum amounts
- Any waste requiring special treatment
- Map showing generation and accumulation locations
- Map of facility and surroundings to include routes of access
- Location of water supply

- Identification of emergency equipment
- Telephone number and name of emergency coordinator

Additionally:

- The SAA location must be identified and labeled using the provided sign:



- The laboratory door signage must be maintained in accordance with the Lab Safety requirements.
- The evacuation maps identified as part of the Building Emergency Action Plan (BEAP) must be posted.