

Hazardous Material and Hazardous Waste Identification Procedure



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Procedure Summary

Environmental Health and Safety at WTAMU is composed of two distinct but integrated environmental safety departments that report to the Vice President of Research and Compliance. Academic and Research Environmental Health and Safety (AR-EHS) is responsible for research and academic related compliance, which includes laboratory and academic research and the associated compliance committees. Fire and Life Safety (FLS-EHS) is responsible for fire related compliance and conducts fire and life safety inspections of campus buildings and assists with the testing all of fire detection and suppression systems.

Supplements [TAMUS Regulation 24.01.01](#)

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1. Purpose

This procedure outlines the requirements and methods to be used to determine if a material or a waste must be classified as hazardous.

AR-EHS is the only department on campus authorized to make determinations regarding hazardous waste characterization and disposal.

In the event a WTAMU employee, student, or university visitor should have a quantity of unused chemical, spent chemical, chemical rinsate, or chemical byproduct as a result of official university business (teaching, testing,

research, maintenance, etc.) and that material needs to be removed from the work area, AR-EHS must be contacted to determine the process for removal or disposal of the no longer needed material. This procedure also applies to empty containers when the contents of those containers included pure chemical, chemical compounds or mixtures, spent chemical, rinsate, or chemical byproducts.

2. Scope

This procedure applies to all WTAMU owned or operated facilities. This procedure also applies to all WTAMU employees, students, and visitors conducting official business for WTAMU regardless of location.

It is the responsibility of the user of any new material or chemical to contact and coordinate with the AR-EHS department. It is the responsibility of the department to inform their employees and students on how and why to contact the AR-EHS department.

3. Procedure

When an employee or student should acquire a quantity of spent, expired, or byproduct of chemical that they would like to be disposed of, they should contact AR-EHS by phone (806)-651-4261 or email ar-ehs@wtamu.edu to organize a pickup time and location. Before the arrival of the AR-EHS employee the employee or student should gather all the items they would like taken into one location and clearly label each item with a name and the primary hazard (if any). Once the chemical is picked up, AR-EHS will take it to one of their locations and determine further course of action. The primary goal for AR-EHS is to find ways to reuse or recycle all chemical on campus before resorting to disposal. In the event that disposal is determined necessary an AR-EHS employee will characterize the waste using the below procedures 3.1 and 3.2 and coordinate and conduct the appropriate disposal method for each chemical.

3.1 Hazardous Materials (Hazmat)

- A material is considered hazardous if a reasonable individual believes the material can cause harm to the environment or to the health of an individual.
- The material can be of solid, liquid, or gaseous form.
- The physical hazard, as well as the chemical or toxicity hazard presented by the chemical, must be used to evaluate the class of material. Examples might include gasses under pressure.
- A chemical which has a warning or caution statement about a health or environmental issue in the label or Safety Data Sheet (SDS) formally known as Material Safety Data Sheet the chemical will be considered a hazardous material (HAZMAT).

3.2 Hazardous Waste (Hazwaste)

A person who generates a solid waste must determine if that waste is hazardous using the following method:

1. Determine if the material is excluded from being a solid waste or hazardous waste per 30 TAC §335.1 of the Texas Administrative Code (TAC) [40 Code of Federal Regulations §§261.2, 261.3, or 261.4].
2. If the material is a solid waste, determine if the waste is listed as, mixed with, or derived from a listed hazardous waste identified in 40 Code of Federal Regulations (CFR) Part 261, Subpart D.
3. If the material is a solid waste, [For purposes of complying with 40 CFR Part 268 or if the waste is

not listed as a hazardous waste in 40 CFR Part 261, Subpart D, he or she must then] determine whether the waste exhibits any characteristics of a hazardous waste as identified in 40 CFR Part 261, Subpart C. [by either:] Texas Commission on Environmental Quality Page 281Chapter 335 - Industrial Solid Waste and Municipal Hazardous Waste Rule Log No. 2000-044-335-WS.

This can be done by:

- (a) Testing the waste according to methods set forth in 40 CFR Part 261, Subpart C, or according to an equivalent method approved by the administrator under 40 CFR §260.21.
- (b) Applying knowledge of the hazardous characteristic of the waste in light of the materials and/or process used to generate the waste, pursuant to §335.511 of this title (relating to Use of Process Knowledge).
- (c) If the waste is a used oil, determine whether used oil is a listed hazardous waste per 40 Code of Federal Regulations §261.3(a) (2) (v). Used oil made hazardous by mixing with listed or characteristically hazardous waste is regulated as hazardous waste under the TAC.

4. Record Retention

No official state records may be destroyed without permission from the Texas State Library as outlined in [Texas Government Code, Section 441.187](#) and [13 Texas Administrative Code, Title 13, Part 1, Chapter 6, Subchapter A, Rule 6.7](#). The Texas State Library certifies Agency retention schedules as a means of granting permission to destroy official state records.

West Texas A&M University Records Retention Schedule is certified by the Texas State Library and Archives Commission. West Texas A&M University Environmental Health and Safety will follow [Texas A&M University Records Retention Schedule](#) as stated in the Standard Operating Procedure [61.99.01.W0.01 Records Management](#). All official state records (paper, microform, electronic, or any other media) must be retained for the minimum period designated.

5. Training

West Texas A&M University Environmental Health and Safety will follow the Texas A&M University System Policy [33.05.02 Required Employee Training](#). Staff and faculty whose required training is delinquent more than 60 days will have their access to the Internet terminated until all trainings are completed. Only Blackboard and Single Sign-on will be accessible. Internet access will be restored once training has been completed. Student workers whose required training is delinquent more than 30 days will need to be terminated by their manager through Student Employment.

Related Statutes, Policies, or Requirements

Contact Office

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