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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 of all fire detection and suppression systems.

Supplements [TAMUS Regulation 24.01.01](#)

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1. Purpose

The purpose of this document is to establish procedures and requirements for West Texas A&M University (WTAMU) to operate as a Small Quantity Generator (SQG) for hazardous wastes (HW), if needed. This procedure lists the minimum requirements for operation for a SQG. While many of the requirements in this procedure are not legally required for a hazardous waste generator operating as a Conditionally Exempt Small-Quantity Generator (CESQG), best management practice is to follow the requirements to the maximum extent feasible. If in any one month a facility exceeds the requirements to be classified as a CESQG, the facility must operate and meet the requirements for operation as a Small Quantity Generator or Large Quantity Generator.

Texas A&M University (TAMU) System Components may be "Large Quantity Generators," "Small Quantity Generators" or "Conditionally Exempt Small Quantity Generators." Since each classification has specific requirements and regulations, each component must determine the regulations that apply to their site and obtain the correct permit. The TAMU Environmental Health and Safety Department (EHSD) will assist any TAMU Department or System Component in determining and meeting their hazardous chemical waste disposal needs. Additional information on specific responsibilities and procedures may be obtained by contacting the TAMU EHSD.

WTAMU currently operates as a CESQG. It is a best management practice for WTAMU to follow the requirements for operation as a SQG to the maximum extent feasible, but it is recommended that WTAMU take every available measure to operate as a CESQG.

Since federal and state regulations govern hazardous chemical waste disposal at WTAMU, failure to comply with any hazardous chemical waste regulation may result in substantial fines and penalties for the university; individual generators (e.g., principal investigators, employees) causing the violation may be personally liable. Violations may range from failure to properly label a container of hazardous waste to intentionally disposing of hazardous chemical waste into the air, down the drain, or in the garbage.

The Resource Conservation and Recovery Act (RCRA) is administered by the U. S. Environmental Protection Agency (EPA). Under this act, the EPA has the responsibility for regulating hazardous chemical wastes. RCRA established a "cradle to grave" hazardous chemical waste management requirement to protect public health and the environment from improper disposal of hazardous chemical waste. The law went into effect in November 1980.

The Texas Commission on Environmental Quality (TCEQ) administers an equivalent to RCRA for the State of Texas under Industrial Solid Waste and Municipal Hazardous Waste Regulations (Title 31, Part IX, Chapter 335).

A waste generator never totally loses liability for environmental damage; therefore, the selection of a reliable disposal facility is very important. In Texas, penalties for non-compliance may be civil, criminal, or administrative violations with penalties ranging from fines of up to \$25,000 per day to a 15-year prison term for individuals.

2. Scope

This procedure applies to all facilities and organizations at West Texas A&M University (WTAMU). It addresses the handling of hazardous waste at the primary accumulation area, and the shipping and disposal of HW.

- WTAMU is part of the Texas A&M University (TAMU) system and is governed by TAMU policies and directives. TAMU has an Environmental Health and Safety (EH&S) program and office. This procedure is intended to meet the TAMU Environmental Health and Safety Standards 24.01.04 EHS – 13.

- WTAMU EHS is responsible for writing and maintaining the WTAMU Hazardous Waste (Hazwaste) Small Quantity Generator Accumulation plan. AR-EHS is responsible for implementing this plan. AR-EHS will:
 - Register WTAMU as a Small Quantity Generator with the EPA and TCEQ when required;
 - Operate in accordance with this plan; and
 - Pick up HW from worksites and satellite accumulation areas when requested and ensure that the HW is transferred to the primary accumulation area or to a licensed Treatment, Storage and Disposal facility (TSDF).

3. Procedures

3.1 Registration

Before operation as a SQG or LQG can begin, EPA and Texas solid waste identification numbers must be obtained.

The types of HW must be determined and identified by both its EPA HW code and Texas waste code:

- Characteristic hazardous waste
- Listed Hazardous waste

WTAMU is a non-industrial facility and does not produce any Industrial Class 1, 2 or 3 waste.

WTAMU may produce “Special Waste,” such as large carcasses of dead animals, which may not be classified as HW. Such waste may, however, require special handling. A letter of agreement between WTAMU and the disposal facility may be required.

Forms TCEQ-0002 and EPA-8700-12 are used to apply for the identification numbers. When TCEQ issues the Texas Solid Waste Registration Number, it will also issue a Notice of Registration (NOR), listing the HW generated. Amendments or changes can usually be done electronically through the State of Texas Environmental Electronic Reporting System (STEERS):

- A \$50.00 registration fee must be paid with the application.
- Each calendar year an Annual Waste Summary must be filed with the TCEQ. This report must be filed with the TCEQ by January 25. This report is only required if the facility generates more than 220 pounds of Industrial Class 1 non-hazardous waste per month.
- Once every five years, a Source Reduction and Waste Minimization Plan must be prepared with an executive summary submitted to the TCEQ.
- This Source Reduction and Waste Minimization Plan will be conducted by each department producing hazardous or universal waste and will be coordinated by EHS.

3.2 Accumulation Areas

The primary HW accumulation area must meet the standards as set by the TCEQ, EPA, and OSHA requirements.

3.2.1 Location

- The accumulation area must be above the 100 year flood plain.
- The edge of the accumulation area must be greater than 50ft from the edge of the facility, including any public access roads.

- The accumulation area must be easily accessible to transportation and emergency vehicles.

NOTE: *Because WTAMU is separated by a public access road (3rd Ave), a request for variance should be filled with TCEQ, permitting transport of hazardous wastes from satellite accumulation areas to the primary accumulation area, if needed.*

3.2.2 Security

At a minimum, access to the accumulation area must be controlled by a chain link fence and locked gate. The area must be clearly posted as a Hazardous Waste Accumulation Area. A sign with the legend, "Danger—Unauthorized Personnel Keep Out," must be posted at each entrance to the accumulation area.

3.2.3 Construction

The accumulation area may be located outdoors, however an overhead roof to prevent rain from striking the waste containers is required. The overhead must be of sufficient height to allow for the access of forklifts or dollies, should such be required.

The accumulation area shall have a concrete or other type of impervious floor to prevent spills or leaks from ground contamination.

The accumulation area should have physical separation or physical barriers to isolate incompatible wastes and or reactive and flammable wastes.

The accumulation area shall have sufficient aisle space to allow the unobstructed movement of personnel, fire protection, or spill control equipment to any part of the accumulation area. In addition, aisle space should be sufficient for access to forklifts or dollies where required. (For example, to move drums or pallets which are storing HW.) As a best management practice (BMP) a minimum aisle space width of 48 inches is suggested. Each aisle shall be clearly marked, and must be kept free of obstacles.

Some HW may be sensitive to climate or may be water reactive. Such wastes must be stored in a climate controlled building. The building must be equipped with explosive-proof wiring, lighting, and heating. The building must be well ventilated to prevent the accumulation of fumes and vapors. Physical separation of incompatible, reactive, and flammable wastes by distance or physical barriers should be maintained.

An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel must be available. A speaker or announcing system is sufficient.

A device, such as a telephone, immediately available at the scene of operations or a hand-held two-way radio, capable of summoning emergency assistance must be available at the accumulation area.

Water at adequate volume and pressure to supply water hose streams or foam producing equipment shall be available at the accumulation area.

Portable fire extinguishers, fire control equipment (including any special extinguishing equipment that a particular hazardous waste might require), spill control equipment, and decontamination equipment must be immediately available at the accumulation area.

3.2.4 Operation

- Containers must be compatible with the waste being stored.
- Container labels must include:
 - A Hazardous Waste label;
 - Type of waste; and
 - Date the waste first started being accumulated.
- Containers must be sealed, except during transfer of waste to and from the container.
- Containers must be stored separate from incompatible wastes. Reactive and inflammable waste should be physically separated by distance or physical barriers or both from other wastes.
- If sensitive to temperature or climate, the waste should be stored in a climate controlled building.
- Containers must be stored in such a manner as to:
 - Be safe;
 - Have the label easily visible; and
 - Allow for inspection of the container.
- Containers must be stored with a provision for secondary containment of the waste should the container leak.
- Secondary containment must be of sufficient volume to confine the volume of any one container should it leak.

3.3 Inspections

- Inspections of waste accumulation areas are required at least weekly. Such inspections should include the following.
 - Inspect containers for leaks or corrosion.
 - Inspect accumulation dates to determine if any time limits for accumulation are coming due.
 - Note the amount of hazardous waste accumulated, to avoid exceeding accumulation limits.
 - Inspect accumulation area for access and physical security.
 - Ensure safety equipment, such as fire and spill control gear is in good condition and current for the type of wastes being stored.
- Records of inspections must be kept on file with AR-EHS.
- Inspections should be done only by personnel who have been documented as having been trained in the required procedures.

3.4 Contingency planning

AR-EHS will appoint an employee to act as emergency coordinator to ensure that emergency procedures are carried out in the event of an accident. The emergency coordinator must be available 24 hours a day, either at the facility or by phone. The emergency coordinator must be trained and know whom to contact and what steps to follow in an emergency. The emergency coordinator is the AR-EHS Director.

Each authorized employee working in the primary accumulation area must have documentation of training. Emergency procedures for spill, fire, or other hazards should be posted.

Coordination and notification agreements should be worked out with local fire, police, hospital, and local or state emergency response teams explaining the types of wastes handled and special requirements or assistance that may be required.

A spill response team should be named and regularly receive training on responding to spills.

Spills that may leave the containment area, or that are in reportable quantities, must be reported immediately to the proper authorities.

3.5 Receiving

Only personnel designated in writing by AR-EHS as trained and authorized should be able to receive hazardous waste from satellite accumulation areas.

Records of the type of waste, location of satellite accumulation area, and date the waste was first received must be maintained.

3.6 Disposal

WTAMU is responsible for ensuring that any transporter or treatment, storage, and disposal facility (TSDF) through whom hazardous waste is disposed meets appropriate standards. Each transporter and TSDF should be licensed through the EPA and the TCEQ. This responsibility will be assigned to AR-EHS.

When shipping HW, the shipping containers must meet the packing and labeling requirements of the DOT, (49 CFR Part 172).

A Texas Uniform Hazardous Waste Manifest (Form TCEQ-0311) must accompany all HW shipped off site. This form will be signed by the generator, and the white copy will be returned to the generator from the TSDF. This form must be kept on record for at least three years.

- If the white copy is not returned to the generator within 35 days from the date of shipment, the TSDF and transporter must be contacted. If the TSDF or transporter does not return the white manifest copy within 10 days of being contacted, an exception report must be filed with the TCEQ.
- Each HW shipment must have Land Ban Documentation attached to the Uniform Hazardous Waste Manifest, declaring whether any land disposal restrictions apply to the waste.

3.7 Training

Each authorized employee working in the accumulation area should receive training in:

- Hazardous Communications;
- Use of Personnel Protective Equipment (PPE);
- Emergency response; including training in:
 - Spill response; and
 - Fire; and
- Record keeping.

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 internet access 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 have their employment terminated by their manager through Student Employment.

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. References and Governing documents

- 30 TAC, Part 1 Chapter 335 subchapters A-S
- 40 CFR 260 - 265
- Texas A&M System Standard 24.01.04.EHS-13 Hazardous Waste Management Program.

6. Large Quantity Generator

Requirements for operation as a large quantity generator include all the requirements for operation as a small quantity generator plus the following:

- Waste accumulation time is limited to 90 days; and
- Additional reporting, including waste minimization plan.

7. Definitions

Acutely hazardous wastes: A subset of listed HW that carry the "H" code; they are considered very harmful to human health and the environment.

BMP: Best management practice, a practice or procedure which, while not specifically required by law, provides an extra safeguard or other benefit.

CESQG: Conditionally Exempt Small-Quantity Generator, a facility that is exempt from some provisions of waste regulations because of the relatively small amounts of HW that it generates. CESQGs must produce less than 100 kg of HW per calendar month and less than 1kg of acutely HW per calendar month. CESQGs may accumulate up to 1000 kg of HW.

CFR: Code of Federal Regulations.

Characteristically hazardous waste: Any waste that exhibits the characteristics of ignitability, corrosivity, reactivity, and/or toxicity as defined by the EPA in 40 CFR Part 261 Subpart C. These are often referred to as the "D" wastes.

Class 1 waste: Any waste or mixture of waste that, because of its concentration or physical or chemical characteristics, is toxic; corrosive; flammable; a strong sensitizer or irritant; a generator of sudden pressure by decomposition, heat, or other means; or may pose a substantial present or potential danger to human health or the environment when improperly processed, stored, transported, disposed of, or otherwise managed.

Class 2 waste: Any individual waste or combination of waste that cannot be described as HW or as nonhazardous Class 1 or Class 3 waste.

Class 3 waste: Waste that is inert and essentially insoluble (determined through various testing methods), usually including but not limited to materials such as rock, brick, glass, dirt, certain plastics, rubber, and similar materials that are not readily decomposable.

Classification code: This last digit of the Texas Waste Code represents the classification of the waste stream. The letter H represents hazardous wastes, and the number 1, 2, or 3 represents nonhazardous industrial waste Class 1, 2, or 3.

Conditionally Exempt Small-Quantity Generator (CESQG): Generators of less than 100 kg (220 lbs) per month of HW or less than 1 kg (2.2lbs) per month of acutely HW. CESQGs have no time limit on accumulation but must not accumulate 1,000kg (2,200lbs) of HW at any time.

Designated facility: see TSDF

DOT: Department of Transport

EPA: the federal Environmental Protection Agency

EPA I.D. number: a number issued by the EPA to identify a facility that generates wastes regulated by that agency.

EPA registration requirement: see EPA I. D. Number

Form code: This code describes the general type of waste stream. It consists of three numbers, the 5th, 6th, and 7th digits in the Texas Waste Code. More than one form code may apply to a particular waste stream.

Generator I.D. number: see Texas Solid Waste Registration Number

Hazardous waste (HW): The EPA defines a waste as hazardous if it exhibits one or more of four hazardous "characteristics," or if it is a "listed" waste (see 40 CFR Part 261 Subpart D).

Hazardous waste determination: An evaluation of a waste to determine whether it meets the RCRA definition of a HW.

Industrial CESQG: A Conditionally Exempt Small-Quantity Generator whose facility would be categorized "industrial" as distinguished from "nonindustrial."

Inert: Inertness refers to the chemical inactivity of an element, compound, or waste. Ingredients added to mixtures chiefly for the purposes of bulk and/or weight are normally considered inert.

Land ban: Generally, a prohibition against land disposal of certain wastes unless they meet certain conditions.

Land ban documentation: Written supporting evidence that a waste can be land-disposed, for example, because it has received some form of treatment.

Listed hazardous wastes: Specific wastes that have been identified by the EPA as hazardous. These are often referred to as the "F" wastes (waste from nonspecific sources), "K" wastes (wastes from specific sources), "P" wastes (acutely hazardous off-specification materials, container residues, and spill residues of these materials), and "U" wastes (toxic, hazardous off-specification materials, container residues, and spill residues). A waste is considered hazardous if (a) it is listed in 40 CFR Part 261 Subpart D, or (b) is mixed with or derived from a waste listed there, and (c) has not been provided a particular exclusion from the definition of hazardous as provided in 40 CFR Sections 261.3-.4.

Large Quantity Generator (LQG): the facility generates 1000 kg or more of HW or the facility generates 1kg of acutely HW or the generator accumulates more than 6000 kg of HW within a calendar month. LQGs may accumulate waste for up to 90 days.

Notice of Registration (NOR): TCEQ term for the information it collects in its database on each hazardous or industrial waste handler: generators, transporters, and operators of treatment, storage, and disposal facilities (TSDF). The NOR includes the facility's physical and mailing addresses, owner and operator information, information on waste streams that are generated or handled at the site, a list of individual units at the facility where wastes are managed, and other information. It also contains the state facility identification number, issued by the TCEQ, and the EPA facility number. The term also refers to a printout of information that is sent to a facility when it makes some change in its registration information. An important purpose of sending this printout is to obtain feedback on whether the TCEQ has current and accurate information.

OSHA: Occupational Health and Safety Administration.

Quantitation limits: In general, the limits of a test's accuracy in measuring the amount of a pollutant.

RCRA: Resource Conservation and Recovery Act (amendment to the Solid Waste Disposal Act). Primarily designed to regulate five types of disposal activities: hazardous waste, solid waste, underground storage tanks, oil waste, and medical waste. In this guidance document, any mention of "RCRA" refers to RCRA Subtitle C, which applies to all handlers of hazardous waste, including generators; transporters; and operators of treatment, storage, and disposal (TSDF) facilities. RCRA, a federal law, covers only whether a solid waste is either hazardous or nonhazardous. Texas regulations further subdivide nonhazardous waste into Classes 1, 2, and 3.

Registration number: see Texas Solid Waste Registration Number

Sequence number: The first 4 digits of the Texas Waste Code (these four characters may be numbers, letters, or a combination of the two). The sequence number is used as an internal numbering system determined by each generator. The number of a waste may range from 0001 to 9999 and may only be used once.

Solid waste: Any discarded material such as garbage; refuse; sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility; or other material including solid, liquid, semisolid, or contained gaseous material resulting from industrial, municipal, commercial, mining, and agricultural operations. Solid wastes include any material that is abandoned by being disposed of; burned or incinerated; or accumulated, stored, or treated before or in lieu of these activities. Certain recycled materials are also considered wastes. Solid wastes are often referred to simply as "wastes."

Small Quantity Generator (SQG): The generator produces between 100 – 1,000kg of HW or between 1 – 100kg of acutely HW, or the generator accumulates 1,000 – 6,000 kg of HW in any calendar month. SQGs may accumulate waste for up to 180 days.

Solid waste registration number: see Texas Solid Waste Registration Number

Special waste: Wastes that require special handling, specially trained people, and/or special disposal methods. These special requirements often arise from the sheer size of the waste itself, lack of knowledge about the process that generated it, and/or the physical characteristics of the waste.

State I.D. number: see Texas Solid Waste Registration Number

State solid waste number: see Texas Solid Waste Registration Number

State of Texas Environmental Electronic Reporting System (STEERS): Enables online reporting of waste management information to the TCEQ by regulated businesses, industries, and other organizations.

TAMU: Texas A&M University

Texas Administrative Code (TAC): Title 30 of TAC contains TCEQ rules on industrial solid waste and municipal hazardous waste, among other subjects.

Texas Solid Waste Registration Number: a number issued by the TCEQ for the purpose of identifying a facility that generates wastes regulated by the state of Texas; also referred to in a variety of ways: generator I.D. number, generator number, state I.D. number, state solid waste number, Texas registration number, Texas solid waste registration number, registration, registration number.

TCEQ: Texas Commission on Environmental Quality

Toxics Release Inventory (TRI): Requires certain companies to report air emissions, waste disposal, and wastewater discharges.

TSDF: Treatment, storage, and disposal facility; also called designated facility.

Waste: Unwanted, discarded, or abandoned materials left over from a manufacturing process; refuse from places of human or animal habitation.

Waste code: Also referred to as Texas waste code. This eight-digit code identifies a waste stream. The first four digits are the sequence number, the next three digits are the form code, and the last digit is the waste's classification (sequence number + form code + classification code = waste code). (Some of the "digits" referred to actually may be letters or a combination of letters and numbers.)

Waste stream: The total flow of solid waste from homes, businesses, institutions, and manufacturing plants that is recycled, burned, or disposed of in landfills; or segments of that total flow, such as the "residential waste stream" or the "recyclable waste stream." (It should be noted that the terms "waste stream," "solid waste," and "waste" are often used interchangeably by federal and state regulators as well as many members of the regulated community).

Waste Reduction Policy Act (WRPA): Requires that certain facilities prepare a Source Reduction and Waste Minimization plan.

Contact Office

WTAMU Environmental Health and Safety
(806) 651-2740

Appendix A

HAZARDOUS CHEMICAL WASTE DETERMINATION

- Only AR-EHS personnel are authorized to make a waste determination for WTAMU.
- A material becomes "waste" when AR-EHS determines that it is no longer useful and should be discarded. If the material is to be discarded, AR-EHS must determine whether the chemical waste is non-hazardous or hazardous. Because the primary source for waste determination is the generator's process knowledge for determining the accuracy of waste determination methods used by individual generators and for identification/characterization of unknown or improperly labeled wastes.
- A material is "non-hazardous chemical waste" if it does not meet the definition of "hazardous chemical waste." A material is "hazardous chemical waste" if it meets one or more of the following:
 - It is a chemical listed on one of the Chemical Tables below;
 - It is a mixture or solution containing a listed chemical and a non-hazardous chemical; and
 - It meets the definition of one of the following.
 - ❖ Ignitability (flashpoint <60° C (140° F) or supports combustion);
 - ❖ Reactivity (e.g., responds violently to air or water, cyanides, explosives, unstable chemicals);
 - ❖ Corrosivity (pH <4 or >10);
 - ❖ EP toxicity (e.g., pesticides, heavy metals, poisons);
 - ❖ It is a Universal Waste per 30TAC 335.261; or the
 - ❖ Material is not excluded from the regulations.
- Non-hazardous waste may be disposed of using the sanitary sewer or regular trash. Additional information about non-hazardous waste disposal can be obtained from AR-EHS.
- Hazardous chemicals can be treated to reduce the hazard or the quantity of waste in the laboratory if the treatment procedure is included as part of the written experimental protocol.
- Gas cylinders should be returned to the manufacturer or distributor whenever possible. Non-returnable cylinders should be tagged as HW.
- Photographic lab waste containing **silver** must be disposed of as hazardous chemical waste. However, some new developing equipment includes a filtration system that removes the **silver**. Photographic lab effluent that does not contain silver may be discarded through the sanitary sewer system. **Please notify the AR-EHS if you have this type of equipment.**
- "Mixed Waste" (includes both radioactive material and hazardous chemicals) should be brought to the attention of the AR-EHS for handling.
- Chemical waste that is "unknown" will be picked up by AR-EHS upon notification. Generators will be charged for the cost of analysis necessary to determine the chemical identity for proper disposal.

Appendix B

CLASSIFICATION AND SEGREGATION OF HAZARDOUS CHEMICAL WASTE

- Hazardous chemical waste is categorized into the following hazard classes:
 - Halogenated solvents.
 - Non-halogenated solvents.
 - Acids (inorganic or organic).
 - Bases (inorganic or organic).
 - Heavy metals (silver, cadmium, lead, mercury, etc.).
 - Poisons (inorganic or organic).
 - Reactives (cyanides, sulfides, water reactive chemicals, peroxides, etc.).
- Different classes of hazardous chemical waste must not be commingled in the same waste container.
- Do not combine inorganic heavy metal compounds and organic waste solvents.
- Do not combine non-hazardous waste (e.g., mixture of water, dilute acetic acid, and sodium bicarbonate) with hazardous chemical waste.
- Dry materials (paper, rags, towels, gloves, or Kim Wipes, etc.) contaminated with flammable or extremely toxic chemicals must be double-bagged in heavy-duty plastic bags and must be treated as hazardous chemical waste. **Do not use biohazard bags.**
- Sharps (needles, razor blades, etc.) are classified as biohazardous waste even if they are not contaminated. Sharps must be encapsulated (place the sharps in a "puncture resistant" container or plastic/metal container and then fill it with paraffin or plaster of Paris). Discard the containers of sharps as biohazardous waste. *Contact AR-EHS for additional information.*