



West Texas A&M University™
ACADEMIC RESEARCH ENVIRONMENTAL HEALTH AND SAFETY
STANDARD OPERATING PROCEDURES

SOP No. 24.01.01.W1.04AR Hazardous Material and Hazardous Waste Identification Procedure

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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 AR-EHS regarding removal of the material from the work area. It is the responsibility of the department to inform employees and students on how and why to contact AR-EHS.

3. Procedure

When an employee, student, or visitor acquires a quantity of chemical (unused, spent, expired, chemical byproduct, rinsate, empty container) which needs to be removed from the work area, contact AR-EHS by phone (806)-651-4261 or email ar-ehs@wtamu.edu to organize a pickup time and location or discuss removal options. AR-EHS will direct the chemical user to gather all the items for removal into a single location and clearly label each item with the known contents of the material. If the contents are unknown then the label should state "unknown". AR-EHS will collect the material and, if safe to do so, relocate it to one of their processing locations for determination of future actions. The primary goal for AR-EHS is to find ways to reuse or recycle all chemical on campus with chemical disposal being the last course of action. 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 (Hazardous Waste)

Solid waste must be evaluated by AR-EHS to determine if that waste is hazardous. This is achieved through 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) then determine whether the waste exhibits any characteristics of a hazardous waste as identified in 40 CFR Part 261, Subpart C (by either: 30 TAC 335 or 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 90 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 90 days will need to be terminated by their manager through Student Employment.

Contact Office

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