

Hazardous Waste Management Plan



**Idaho State
University**

**Environmental
Health and Safety**

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isu.edu/ehs

ROAR



Revision Record

Date	Description of Change	Editor
August-December 2019	Major Revision of 2008 hazardous waste management plan and procedures.	Jennifer Parrott, Environmental Programs Manager
August 2024	Revision	Mohammed Alqurashi Hazardous Waste Specialist

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1.0 Purpose

Idaho State University is committed to ensuring a healthy and safe work environment for the campus community. The purpose of the Idaho State University (ISU) Hazardous Waste Management Plan (Plan) is to prevent the improper management or disposal of hazardous waste and to ensure compliance with federal and state hazardous waste regulations. Proper management of hazardous waste and compliance with state and federal regulations will prevent harm to human health or the environment and ensure the safety of the campus community.

Persons who disregard the contents of this Plan and its supporting guidelines, procedures and regulations assume personal responsibility for the mismanagement of hazardous waste and violations of state and federal law. **You can be held personally liable for “willfully and knowingly” violating the hazardous waste regulations.** This Plan outlines proper hazardous waste management procedures that are applicable to all faculty, staff, students, contractors and visitors. Departments, work groups or units that fail to comply with the hazardous waste regulations or EHSS waste disposal requirements may be responsible for paying the fines associated with their noncompliance. The maximum civil penalty for violations of the hazardous waste regulations is over \$70,000 per day, per incident.

2.0 Scope

Information in this Plan applies to all ISU Campuses and Facilities. Specific regulatory requirements are dependent on generator status which can change monthly. Specific waste management guidelines for very small quantity generators (VSQGs) are available in Appendix A. Typical generator status for ISU facilities is outlined in Section 7.0. This Plan does not apply to the management of **hazardous materials** which are covered under separate Environmental Health and Safety Plans. This Plan applies only to hazardous waste generation, management, storage, and disposal. This Plan does not apply to the management of radioactive waste, mixed waste (hazardous and radioactive) or medical (biohazardous) waste. Guidance on the management and proper disposal of other waste streams is available from the EHSS and Radiation Safety Department.

3.0 Responsibilities

3.1 Waste Generators

Principal investigators, supervisors, workers, laboratory staff, students and visitors are considered the actual originators (generators) of the waste. It is the responsibility of each generator to identify any and all hazardous wastes and to ensure the waste is handled in a manner consistent with the EHSS requirements listed in this Plan. Principal investigators and supervisors working in laboratories are responsible for ensuring that personnel operating under their direction follow all policies and procedures established in this Plan. General responsibilities include:

- Attending hazardous waste training either in-person or online (initially and annually thereafter). Students should be trained by the personnel responsible for the satellite accumulation area (SAA). Appendix D includes a short training form for students.
 - Properly identifying and labeling of containers
 - Collecting all waste in accordance with established guidelines
 - Cleaning up incidental spills
 - Maintaining good housekeeping in waste generation areas
-
- Managing the satellite accumulation area and making observations regarding proper hazardous waste management
 - Contacting EHSS for assistance with managing hazardous waste

3.2 EHSS Department

The EHSS Department has authority over the hazardous waste program and their primary role is to assist in monitoring regulatory compliance with federal and state regulations. The EHSS Department also picks up, processes and transports waste and ensures disposal is in a safe, compliant and environmentally responsible manner. Specific responsibilities include:

- Evaluating the hazardous waste management program
- Updating the Hazardous Waste Management Plan as needed
- Providing assistance in making hazardous waste determinations
- Providing technical expertise
- Conducting weekly inspections of the hazardous waste main staging area (90-day area)
- Providing training
- Coordinating waste pickups
- Periodically reviewing hazardous waste management in SAAs
- Monitoring regulatory changes and how they impact ISU

4.0 Regulatory Basis

An important distinction should be made between materials and waste. For the purposes of this Plan, a material is currently being used or has value for future use. A waste no longer has value, is off-specification or expired, and is destined for disposal. This Plan only focuses on items considered waste.

Hazardous waste management, identification, labeling, handling, storage and disposal is regulated under the Resource Conservation and Recovery Act (RCRA). RCRA was passed by congress in 1976 as an amendment to the Solid Waste Disposal Act of 1965. The statutory requirements for facilities managing hazardous waste are found in Subtitle C of the RCRA law. RCRA waste regulations were effective in 1980. The US Environmental Protection Agency and Idaho Department of Environmental Quality (DEQ) have authority over the hazardous waste program in Idaho. DEQ conducts unannounced full compliance inspections regularly of ISU. Hazardous waste regulations are codified federally at 40 CFR Parts 260-273 and in Idaho at IDAPA 58.01.05.

5.0 Hazardous Waste Management

Hazardous waste is waste that has certain properties that make the waste dangerous to human health or the environment. Hazardous waste is regulated from cradle to grave, meaning from the moment it is generated until it reaches its final destination for disposal or treatment at an offsite facility. Hazardous waste management should begin before the material becomes a waste. When purchasing new materials or chemicals, ask the following questions:

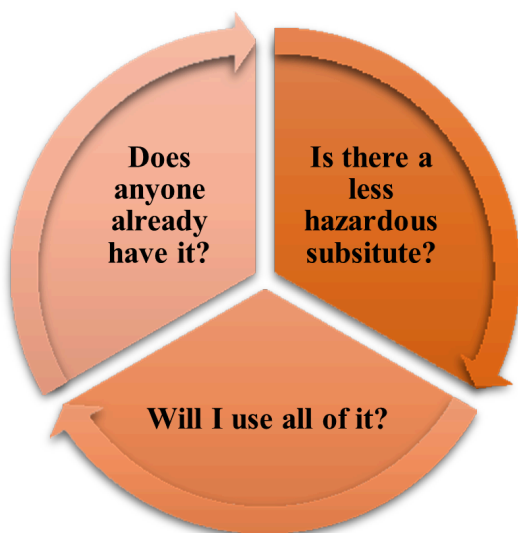


Figure 1: Questions to ask before purchasing new materials and chemicals.

EHSS encourages Departments to share materials that have value for use. [CampusOptics](#), allows users to research availability of chemical products in another user's inventory. Contact information is provided for requesting the product. EHSS also encourages Departments to purchase the smallest amount needed. It may appear initially that there is significant cost savings in buying larger quantities or making bulk purchases. However, excess quantities or expired materials are often given to EHSS as waste. The initial cost savings are lost in the disposal costs.

In order for a waste to be a hazardous waste, it must meet certain criteria outlined in the hazardous waste rules. Section 6.0 details the process for determining if a waste is a hazardous waste. Hazardous waste may include chemical waste, spent solvents, outdated or unneeded chemicals, spent solutions, undesired cleaning products, electronic devices, hand sanitizer, paints and stains, lamps and batteries. Hazardous waste determinations are complicated and therefore all chemical/industrial waste should be assumed to be hazardous waste until an official determination can be made.

6.0 Hazardous Waste Determinations

Hazardous waste determinations are made by the Department, unit or laboratory that generated the waste. EHSS can provide assistance in making or verifying hazardous waste determinations. Never dispose of hazardous waste in the trash, sanitary sewer (via the sink/toilet/drain) or a storm drain. Do not mix hazardous waste with other biological, infectious or radioactive waste. Determining if a waste is a hazardous waste involves asking the questions outlined below:

Is it a waste?

- If you no longer wish to keep a material, it may not be a waste if someone else could use it. If you think the material could be used by someone else, contact EHSS.
- A material becomes waste when it no longer has value for use:
 - It has been used or has gone through a process
 - It is contaminated
 - It is off specification or has exceeded its expiration date
 - It is no longer wanted and has no foreseeable potential for use

Is it a solid waste?

RCRA defines solid waste as “garbage, refuse, sludge and other discarded materials” including solids, liquids, semi-solids, and compressed gases. If you believe the waste you are generating can be recycled, please contact EHSS.

Is it a listed waste?

Does the material or chemical appear on one of the four lists provided in the hazardous waste regulations?

- [F-List](#): Wastes from non-specific sources (spent solvents)
- [K-List](#): Wastes from specific sources (unlikely at a University)
- [P-List](#): Acutely toxic (unused or off-specification)
- [U-List](#): Toxic (not acutely toxic, unused or off-specification)

And/or does it have a characteristic?

Hazardous waste may be listed **and** characterized. Or hazardous waste may be listed **or** characterized as a waste. Just because you did not find your material or chemical on one of the lists, you are not finished with the hazardous waste determination process and must still determine whether your waste exhibits a characteristic. These characteristics include:

- Ignitability
 - Liquid with a flashpoint less than 140°F/60°C
 - Solid capable under standard pressure of causing fire through friction, absorption of moisture, spontaneous chemical changes or when ignited burns so vigorously and persistently it creates a hazard
 - Is an ignitable compressed gas
 - Is an oxidizer
 - Examples include: ethanol, sodium nitrate, xylene and acetone
- Corrosivity
 - Aqueous with a pH less than or equal to 2 or greater than or equal to 12.5
 - Examples include: nitric acid, hydrochloric acid, sodium hydroxide
- Reactivity
 - Normally unstable and readily undergoes violent change without detonating
 - Reacts violently with water

- Forms potentially explosive mixtures with water
- When mixed with water generates toxic gases, vapors or fumes
- Is a cyanide or sulfide bearing waste which when exposed to a pH between 2 and 12.5 can generate toxic gases, vapors or fumes
- Is capable of detonation or explosive reaction if subjected to a strong initiation source or if heated under confinement
- Is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure
- Is a forbidden explosive as defined in 49 CFR 173.54
- Examples include: lithium metal and lithium compounds, nitroglycerin, empty rattle cans (aerosol cans)
- Toxicity
 - TCLP analysis yields results \geq threshold values for one or more of the 40 chemicals (mostly toxic metals and organic chemicals)

The hazardous waste determination must be made at the point of generation when the waste is first generated. This was a change promulgated by the Generator Improvement Rule and was effective in Idaho on March 28, 2018. A worksheet is available in Appendix B for making hazardous waste determinations. Hazardous waste determinations should be linked to the hazardous waste label, meaning that a unique identifier should be placed on both the waste determination form and label for easy cross reference. Waste determinations should be kept in the SAA and made available upon request.

7.0 Generator Requirements

7.1 Generator Sizes

There are three generator sizes outlined in the hazardous waste rules. These generator classifications include very small quantity (VSQG), small quantity (SQG) and large quantity (LQG). Generator status is determined monthly and can change from month to month. Figure 2 identifies the thresholds for generators among the three categories. Regulatory burden increases as generator size increases.

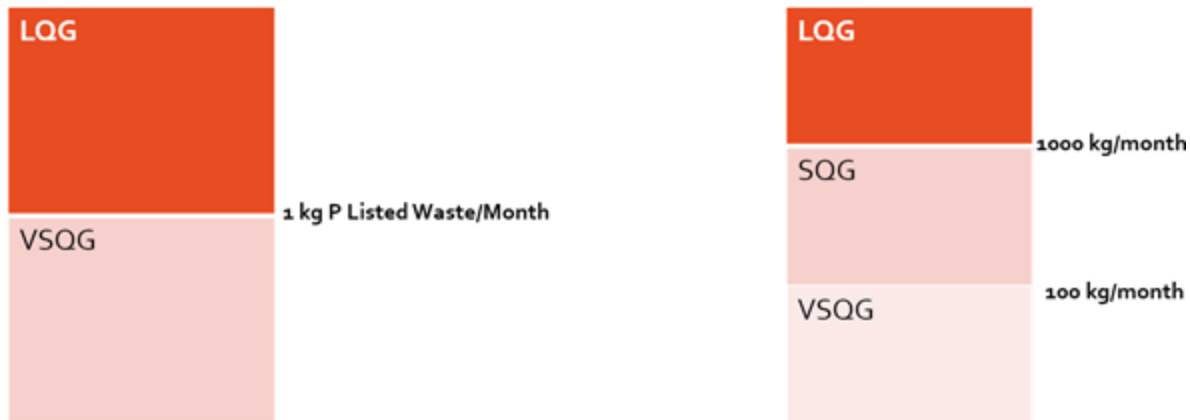


Figure 2: Threshold values for generator categories based on monthly hazardous waste generation.

The Pocatello Campus fluctuates monthly between SQG and LQG. Because of the unpredictability in this fluctuation, the Pocatello campus continually operates as a LQG.

SQGs generate more than 100 kilograms, but less than 1,000 kilograms of hazardous waste per month. EAMES complex operates as SQG.

VSQGs generate less than 100 kilograms of non-acute hazardous waste, 100 kilograms of acute spill cleanup residue, AND 1 kilogram or less of acutely toxic hazardous waste ([p-listed](#)) PER MONTH. The non-contiguous facilities that are VSQGs include:

- Center for Advanced Energy Studies
- Center for Higher Education in Idaho Falls
- Meridian Sam and Aline Skaggs Health Science Center
- Diesel Armory
- Diesel Dowling
- MCERC
- Business and Technology Center
- Idaho Accelerator Center

The following sections apply specifically to the Pocatello campus as a LQG. Details on VSQGs are available in Appendix A.

7.2 Accumulation Areas

Satellite Accumulation Areas (SAAs)

Locations on main campus where hazardous waste is generated and temporarily stored are called Satellite Accumulation Areas. The sign shown below must be posted at all SAAs. This new sign was issued in the fall semester of 2019 and replaces all earlier versions. A printable copy of this sign is available in Appendix C. EHSS can provide laminated signs.

The RCRA regulations allow for the temporary accumulation of hazardous waste in SAAs. SAAs allow for the safe accumulation of hazardous waste in laboratories, shops and maintenance areas before removal by EHSS. SAAs must be set up at or near the point of generation and must be under the control of the generator. Most interpretations of where an SAA should be located is within the room in which the waste was generated. SAAs must be labeled and should not be located near sinks or floor drains. The SAA should be located in an area with minimal traffic. SAAs provide regulatory flexibility and are subject to less stringent requirements. The following rules apply to SAAs on main campus:

LID

- Waste containers must be kept closed except when adding waste (no open funnels, no saran wrap/foil, no tape). There are exceptions for proper equipment operation or venting to prevent pressure build-up.
- EHSS can provide containers for hazardous waste accumulation or assistance in selecting appropriate containers.

Adding the primary hazard to a hazardous waste label in an SAA is a NEW requirement that is effective immediately.

LABEL

- The area should be labeled as a satellite accumulation area using the new sign.
- Containers must be labeled with an EHSS Hazardous Waste sticker with the primary hazard identified.
- Labels are available from EHSS, biology stockroom or chemistry stockroom free of cost.
- Container labels should also include the full chemical name and concentration.
- Abbreviations, chemical formulas, nicknames and chemical structures are not permitted on labels.

LEAKS

- Containers must be compatible with the waste they contain.
- Wastes should be segregated based on compatibility, segregated from hazardous materials (non- waste) and stored in secondary containment.
- Segregation can be accomplished by physical distance and utilizing secondary containment.
- Secondary containment containers can be provided by EHSS at no cost.
- The ISU Chemical Hygiene Plan includes guidance on chemical segregation and incompatible chemicals.
- Containers must be in good condition, with clearly visible labels and no evidence of contamination or spilling or leaking.
- Containers should not protrude into an aisle way or block emergency equipment or exits.

LOCATION

- SAAs must be at the point of generation and under control of the generator (A basic rule of thumb is that hazardous waste must remain in the same room it is generated in).

SAAs have hazardous waste accumulation limits not time limits. For P-listed waste (acutely toxic) accumulation cannot exceed 1 quart for liquids or 1 kilogram for solids (approximately 2 pounds). Common [P-Listed](#) wastes include sodium azide, nicotine and sodium cyanide. For other hazardous waste streams, accumulation cannot exceed 55 gallons. Once the accumulation limit is reached, EHSS must remove the excess material from the SAA within 3 calendar days. EHSS should be contacted immediately if either accumulation limit is reached or preferably before or as the accumulation limit is nearing.

7.3 Labeling and Storage

All hazardous waste containers must have an EHSS hazardous waste label attached to the container when the first drop of hazardous waste is placed into the container. All sections of the label must be completed. Do not use chemical symbols, abbreviations, or slang. Instead include the full chemical name. All chemical constituents should be identified by knowledgeable personnel. This information is important to ensure proper characterization and disposal. For laboratory experiments, it is important to maintain careful documentation and review all products used in the protocol to get an accurate waste characterization. EHSS offers three label sizes to accommodate differing container sizes. Labels must be affixed to the individual container.

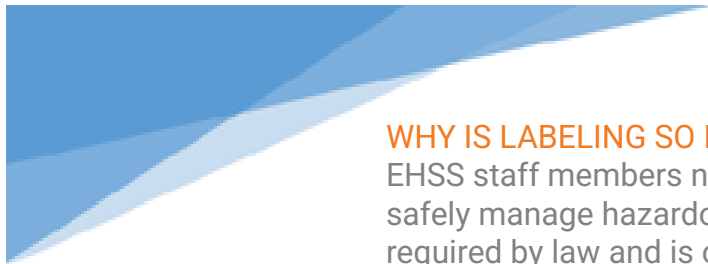
If a container is found and the composition is unknown, it should be assumed to be hazardous waste. The container should be labeled with a hazardous waste sticker and should read "unknown analysis pending". Please contact EHSS immediately upon the identification of an unknown.

EHSS provides free printed labels. Contact EHSS for labels at (208) 282-2310.

7.4 Management of Containers

Open containers are one of the most common EPA violations for hazardous waste management. In addition to being a regulatory violation, open containers allow for evaporation (considered treatment and requires a permit), invite spills and potentially expose people to hazardous waste.

Containers are to be maintained in good condition and kept closed at all times except when adding waste. There are a couple of exceptions allowed under the Generator Improvement Rule, these exceptions include equipment operation and venting to prevent pressure build up. Please notify EHSS if equipment requires open containers or venting is necessary. If the container is damaged, it must be replaced or over-packed. Chemical containers must be compatible with the contents of the container as to not cause a reaction and to maintain the integrity of the container. All containers must have labels and be stored within secondary containment bins. EHSS provides secondary containment bins at no charge. Hazardous waste must always stay in the SAA. Hazardous waste cannot be transferred among SAAs, moved to a storage room or stockroom and can never be stored in public areas (such as hallways). Hazardous waste containers are also available from EHSS free of charge. Hazardous waste should be segregated according to the ISU Chemical Hygiene Plan.



WHY IS LABELING SO IMPORTANT?

EHSS staff members need this information to decide how to safely manage hazardous waste. In addition, labeling is required by law and is one of the most common hazardous waste violations. Labeling also prevents unknowns which can be costly and dangerous.

7.5 Unknowns

Waste that is picked up by EHSS must be completely and accurately identified.

Waste that is not identified is referred to as an “unknown”. Unknown waste may have no label or an illegible label or have codes or generic process information. Chemical unknowns are costly to analyze and can cost over \$1500 per sample. If there are unknowns in a laboratory or classroom space, every attempt should be made to interview personnel that may have information about the unknown. When EHSS receives the unknown any available descriptive information must accompany the material. This information would include odor, color, pH, likely source of generation, previous processes or research in the area and information from interviewing those who work in the area.

Containers of unknowns should be presumed to be hazardous waste and should be labeled as indicated in the labeling section of this Plan. If an unknown has evidence of crystallization, or it is believed to contain biohazardous material or radioactive material, contact EHSS for assistance.

Unknowns can be prevented by maintaining labels, periodically inspecting chemicals, good chemical hygiene practices and utilizing the ISU Chemical Inventory Program ([CampusOptics](#)).

7.6 Elementary Neutralization

RCRA does allow facilities to treat corrosive hazardous waste in elementary neutralization units. If you generate hazardous waste with characteristic of corrosivity, contact EHSS to determine if you are eligible to neutralize under this provision.

8.0 Hazardous Waste Pickups and Disposal

8.1 Improper Disposal

Hazardous chemicals or waste **must never** be poured down the drain as a method of disposal. Under no circumstance should hazardous waste be discharged into the environment (through disposal, evaporation or entry into the sanitary or storm sewer). Anyone with knowledge of the inappropriate disposal of potentially hazardous waste should contact EHSS immediately. Improper disposal of hazardous waste is illegal and can have significant repercussions.

EHSS assumes all disposal costs for hazardous waste and will always pickup waste in the course of routine operations. EHSS may request budget relief from a Department or unit if:

1. A sudden lab closure due to the departure of a PI results in substantial unknowns and/or substantial man power to clean up
2. A faculty member retires and has not been disposing of waste over time leaving a sudden burden of waste to remove
3. An instance of negligence related to the management of hazardous waste in accordance with this Plan

8.2 Requesting a Pickup

To schedule a hazardous waste pickup, submit a [waste pickup](#) request on the EHSS website. The typical turnaround time for hazardous waste removal is 5-7 business days unless an accumulation limit for an SAA is met. Please notify EHSS by phone if you are approaching an accumulation limit for an SAA. Refer to the Accumulation Areas section for more details.

In order for EHSS to accept the waste, the following conditions must be met:

1. The containers must be clean and in good condition (no evidence of spilling, leaking, cracking or denting)

2. The containers must be closed (no open funnels, saran wrap, aluminum foil or other filling devices)
3. The hazardous waste label must be properly filled out to include the full chemical names with concentrations and hazards. Concentrations should be shown as a percent and should equal 100
4. All liquid laboratory waste must include a pH
5. Only containers included on the waste pick-up form will be removed
6. The containers must be stored in a secure location until they are removed by EHSS
7. Do not put containers in the hallway or move them to another lab or stockroom

Containers not meeting the above requirements will not be picked up until all conditions can be satisfied.

8.3 Other Waste Streams

Non-RCRA Waste Disposal

There are many chemicals, products and reagents that do not meet the federal definition of a hazardous waste. These materials are still collected by EHSS to ensure proper disposal.

Mixed Waste

A mixed waste is waste that is both hazardous waste and radioactive waste. Disposal of mixed waste is costly and difficult. Before generating a mixed waste, contact Radiation Safety. A disposal pathway must be identified before mixed waste is generated. In addition, all mixed waste generation requires approval by the Radiation Safety Committee.

Universal Waste

Universal waste is a subset of hazardous waste with reduced regulatory requirements. Universal wastes include batteries, light bulbs, mercury containing devices and some pesticides. For more information on universal waste handling and management, visit the EHSS website.

Empty Containers

Containers holding **non-acute** hazardous waste are considered RCRA-empty when they meet the following conditions:

- All waste has been removed using practices commonly employed industry-wide to remove waste from containers, such as pouring, pumping, aspirating and draining, and
- No more than 2.5 centimeters of material remain in the container, or
- No more than 3% by weight of the container remains for containers with a capacity of 110 gallons or less and no more than 0.3% by weight remains for containers with capacities over 110

Containers that have been emptied should be defaced of all hazard information and chemical information and labeled “empty”. These containers are considered RCRA empty and can be disposed of in the regular garbage.

Any empty container that once contained a P-Listed (acutely toxic) hazardous waste should be given to the EHSS Department for disposal.

8.4 Where does my hazardous waste go?

When EHSS removes hazardous waste from a SAA it is transferred to the Main Staging Area/90-Day Accumulation Area. As a LQG, ISU has 90-days to remove the waste from the Main Staging Area. When hazardous waste is moved to the Main Staging Area it is dated and segregated. EHSS performs weekly inspections of the Main Staging Area. The majority of hazardous waste generated at ISU goes to Utah for incineration by a permitted Treatment, Storage and Disposal Facility.

9.0 Waste Minimization

Under RCRA, the generation of hazardous waste is to be minimized or eliminated as feasible. The goals of ISU’s waste minimization program are to reduce the amount of hazardous waste generated and to reduce the inherent toxicity of the wastes generated. The following practices are key elements of the waste minimization program:

1. Maintain a current inventory of chemicals. EHSS can provide assistance with developing a chemical inventory through [CampusOptics](#), visit the EHSS website for information. [CampusOptics](#) allows for the sharing of chemicals among laboratories or units.
2. Select less toxic hazardous chemicals or substitute a non-hazardous material for a hazardous material whenever possible
3. Practice Source Reduction: Order the smallest quantity of the material necessary
4. Do not accept free or donated materials that have no immediate use
5. Review laboratory protocols to identify hazardous waste streams and review whether they can be reduced or minimized before work commences
6. Minimize quantities of solutions containing heavy metals
7. Reduce the scale of laboratory experiments to reduce the volume of waste being produced

8. Clearly label all materials used in the laboratory to prevent the generation of unknowns

The EHSS maintains a group email list that can be used to offer up excess material or ask the campus community if they have excess material to share. Please contact EHSS to make a request or utilize [CampusOptics](#).

10.0 Training

Hazardous waste training is required for those who handle or generate hazardous waste. Training must be completed annually and is available both in-person and online. Submit a [training request](#) on the EHSS website. EHSS will tailor hazardous waste training to the needs of a Department or unit if requested (e.g. shorter training, training during faculty or staff meetings, etc).

11.0 Spills

All Departments or Units generating hazardous waste should be familiar with the hazards associated with waste. If a small spill occurs of a hazardous waste in a Department or Unit, the spill can be cleaned by personnel familiar with the hazards of the waste. If you are unsure of the regulatory status of clean-up materials, contact EHSS. For large spills that could harm human health or the environment, immediately notify occupants and evacuate the area and contact Public Safety at (208) 282-2515 or 911.

12.0 Security

Hazardous waste storage areas should be secure. Access should be limited to those who have received training and are familiar with the hazards. Any attempts by unknown personnel to gain access to hazardous waste storage areas should be immediately reported to Public Safety (208) 282-2515.

13.0 Appendices:

13.1 Appendix A: Requirements for Very Small Quantity Generators (VSQGs)

Requirements for Very Small Quantity Generators (VSQGs)

Very small quantity generators have a greatly reduced regulatory burden. The following requirements and best management practices apply to very small quantity generators.

The following facilities are very small quantity generators:

- Idaho Accelerator Center
- Business and Technology Center
- Eames Complex, Diesel Armory
- Diesel Dowling, Center for Higher Education
- Center for Advanced Energy Studies
- Meridian Sam and Aline Skaggs Health Science Center.

Efforts should be made to track hazardous waste generation at all of these facilities and to maintain VSQG status.

Regulatory Requirements:

Monthly Generation:

- 100 kilograms or less of non-acute hazardous waste
- 100 kilograms of acute spill cleanup residue
- 1 kilogram or less of acutely toxic hazardous waste ([p-listed](#))

Hazardous Waste Determinations

- Identify and count all hazardous waste generated
- Must be made at the point of generation
- Utilize the form in Appendix B
- Keep records of hazardous waste determinations

Accumulation Limit

- If a VSQG accumulates at any time 1,000 kilograms or greater of a non-acute hazardous waste the facility is subject to the requirements for small quantity generators
- Hazardous waste removal is scheduled approximately two times per year at the VSQGs. If accumulation is approaching 1,000 kilograms, contact EHSS immediately.

Best Management Practices for VSQGs

Labeling and Container Management

- Hazardous waste labels included in this section should be applied to containers of hazardous waste when the first drop is placed in the container. EHSS provides these labels at no cost.
- Containers should be closed, in good condition and compatible with the waste

Hazardous Waste Storage

- VSQGs do not have to comply with any of the satellite accumulation area provisions but EHSS recommends storing hazardous waste in a designated area. A sign is available in this section for designating an area.

Very Small Quantity Generator Hazardous Waste Accumulation Area

- Containers should be closed except when adding waste
- Exceptions are for proper equipment operation or venting to prevent pressure build-up
- Apply an EHSS Hazardous waste label
- Use waste containers that are compatible with the hazardous waste
- Segregate incompatible wastes
- Store hazardous waste separate from hazardous materials
- Use secondary containment and clean up spills
- Containers must be in good condition

Contact EHSS immediately if you are approaching accumulation limits or anticipate generating waste from a project that may affect generator status.

13.2 Appendix B: Hazardous Waste Determination Worksheet
Idaho State University
Hazardous Waste Determination Form

Generator Information	
Generator Location (Building and Room #):	
Person Completing this Form:	
Phone Number:	
Waste Process and Description	
Chemical/Waste Name:	
Physical Description/State:	
Process Generating Waste:	
Waste Determination	
Waste determination based on: <input type="checkbox"/> User knowledge (process evaluation, SDS, interviews) <input type="checkbox"/> Waste analysis (attach analytical results)	Date:
Is the waste a listed hazardous waste? F-List K-List P-List U-List	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
Selected Waste Codes:	
Is the waste a characteristic hazardous waste? Ignitable (<140F, oxidizer, flammable solid) Corrosive (pH ≤ 2 or ≥ 12.5) Specify pH: _____ Reactive Toxic (Select group of 8 heavy metals, 10 pesticides and 22 organic chemicals)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
Primary Hazards: <input type="checkbox"/> Ignitable <input type="checkbox"/> Corrosive <input type="checkbox"/> Reactive <input type="checkbox"/> Toxic <input type="checkbox"/> Other:	
Final Determination	
<input type="checkbox"/> Hazardous Waste <input type="checkbox"/> Non-Hazardous Waste <input type="checkbox"/> Used Oil <input type="checkbox"/> Universal Waste (Light bulbs, batteries, mercury containing devices)	

**Idaho State University
Hazardous Waste Determination Form**

Composition (if mixture):	
Compound	%
Total	100
Certification	
Signature	Date
I have completed this form to the best of my knowledge and have sought guidance from EHSS if necessary.	

13.3 Appendix C: Satellite Accumulation Area Sign

Hazardous Waste Satellite Accumulation Area

Lid

- Containers must be closed except when adding waste
- Exceptions are for proper equipment operation or venting to prevent pressure build-up

Label

- Apply an EHSS Hazardous Waste Sticker
- Identify hazards: toxic, corrosive, etc
- Describe contents and concentrations
- Spell out names. NO abbreviations, chemical formulas or chemical structures

Leaks

- Use waste containers compatible with contents
- Segregate incompatible materials
- Use secondary containment and clean up spills
- Containers must be in good condition

Location

- The SAA must be at or near the point of generation
- Transfer among SAAs is prohibited (keep waste in the room it was generated)

13.4 Appendix D: RCRA Training for Students

Hazardous Waste Awareness Training for Students

Overview

Idaho State University (ISU) has procedures for managing hazardous waste to prevent the improper management or disposal of hazardous waste and to ensure compliance with federal and state hazardous waste regulations. Proper management of hazardous waste and compliance with state and federal regulations will prevent harm to human health or the environment and ensure the safety of the campus community. Hazardous waste management, identification, labeling, handling, storage and disposal is regulated under the Resource Conservation and Recovery Act (RCRA).

Identification, Labeling and Storage

ISU must identify and characterize waste before disposal. There is a process outlined in both the federal regulations and ISU's Hazardous Waste Management Plan for determining whether a waste is a hazardous waste. This process relies on reviewing whether a waste is listed or exhibits a characteristic. Hazardous waste is typically acutely toxic, toxic, ignitable, corrosive or reactive. As a student, you should consult with your professor, laboratory supervisor, or principal investigator for proper disposal of waste. Hazardous waste should be accumulated in a satellite accumulation area and be labeled. Labels should include the words "hazardous waste", a description of the contents (full chemical name) and an indication of the primary hazard. Hazardous waste should also be segregated to prevent incompatible wastes from reacting. The Environmental Health and Safety (EHSS) Department removes hazardous waste from satellite accumulation areas after the receipt of an electronic request.

YOUR Role in Hazardous Waste Management

Students are responsible for reviewing and following the guidelines and procedures outlined in the Hazardous Waste Management Plan. A copy of this Plan is available on the EHSS website and is printed and located near the satellite accumulation area. Students can contact their instructor, supervisor, laboratory manager or EHSS with questions or concerns.

Acknowledgement

I have reviewed the information contained in this document and reviewed the Hazardous Waste Management Plan.

Printed Name	Signature	Date