

SECTION: Administrative

SUBJECT: **HEALTH AND SAFETY – HAZARDOUS MATERIALS**

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**Background:** Lewis-Clark State College is committed to providing a safe and healthy environment for all to work and learn. Current trends in federal and state environmental laws and regulations reflect increasing concern for protecting employees and the environment through responsible hazardous materials disposal. A proactive hazardous materials and waste management program, incorporating federal and state regulations with College procedures and guidelines for the storage, transportation, handling and disposal of hazardous materials, will fill a genuine need for the College community.

**Point of Contact:** VP for Finance and Administration/Director of Physical Plant

**Other LCSC offices directly involved with implementation of this policy, or significantly affected by the policy:** Vice President for Finance and Administration, Physical Plant, DONSAM

**Date of approval by LCSC authority:** July 9, 2020

**Date of State Board Approval:** N/A

**Date of Most Recent Review:** July 2020

**Summary of Major Changes incorporated in this revision to the policy:** New Policy

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## **A. Introduction**

1. Guidelines and procedures are provided for the proper handling, storage, containment, accumulation and disposal of hazardous materials. Proactive hazardous materials management and waste minimization practices are a large function of this policy/procedure.
2. Reducing the quantity of hazardous waste generated by the College will help protect the environment, and save money in hazardous materials disposal costs, minimize liability, and reduce regulatory requirements of the College.
3. Departments/Divisions/Units and individuals (faculty/staff) are responsible for properly identifying, characterizing, and preparing potentially hazardous materials for collection and disposal. Employees who handle hazardous materials are required to review the applicable Material Safety Data Sheet (MSDS) prior to handling. It is the responsibility of Department/Division/Unit supervisors to ensure that procedures in place guiding proper handling, storage, disposal and reporting processes associated with hazardous materials; and that employees, students, guests, and visitors are aware of and follow the procedures. Hazardous materials are never to be delivered or sent through the campus mail.

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4. College facilities located outside of Lewiston are responsible for following the guidelines and procedures outlined in this policy.

## **B. Regulatory Background**

1. The Resource Conservation and Recovery Act (RCRA) of 1976 was passed by Congress to regulate the generation, storage, treatment, transportation, and disposal of hazardous waste in the United States. RCRA set the foundation for the Environmental Protection Agency (EPA), which has the power to promulgate and enforce regulations governing hazardous waste activities within RCRA's guidelines and amendments. EPA regulations can be found in the Code of Federal Regulations (CFR), Title 40. RCRA was amended in 1980 by the Solid Waste Disposal Act, which provided for more stringent enforcement of regulations and steeper fines for violations concerning hazardous waste activities. In 1984, RCRA was again amended by the Hazardous and Solid Waste Act Amendments (HSWA), which initiated a program to restrict and ban the disposal of certain hazardous wastes. The Hazardous and Solid Waste Amendments to RCRA in 1984 mandate that generators of hazardous waste must have a hazardous waste minimization plan in action. This policy serves as a formal hazardous waste minimization plan for the College. In 1995, EPA promulgated the universal waste program to promote the collection and recycling of certain widely generated hazardous wastes, known as “universal wastes.” Universal wastes are subject to special management provisions intended to ease the management burden and facilitate the recycling or proper treatment and disposal of such materials.
2. The State of Idaho has received primacy from the EPA to regulate state hazardous waste activities. Primacy allows for a state to operate a hazardous waste program under the guidelines set forth by the EPA regulations but must be at least as strict as those provided by the EPA. LC State follows the guidelines set forth by the EPA as enforced and overseen by the Idaho Department of Environmental Quality (DEQ).
3. The Department of Transportation (DOT), in accordance with 49 CFR and by an EPA/DOT Memorandum of Understanding, regulates the proper packaging and safe transport of all hazardous, infectious and radioactive materials (including hazardous and radioactive waste). DOT regulations instruct shippers how to package, segregate, mark, label, and manifest hazardous materials/wastes for transport in commerce.

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**C. HANDLING HAZARDOUS WASTE - WASTE MINIMIZATION**

1. Source reductions involve reducing the quantities of hazardous waste generated by substituting, reducing, and/or eliminating hazardous materials used in a process; or eliminating processes that generate hazardous waste. Hazardous waste reduction can be achieved by using computers, models and/or instrumentation to achieve the same results without generating hazardous waste. Every attempt should be made to find substitutions for hazardous materials in a process to render its waste as nonhazardous. Chemical processes (which cannot be eliminated, etc., or in which chemical substitution is not a viable solution to minimize hazardous waste generation) should be scaled down to reduce quantities of materials used and wastes produced. Purchase hazardous materials in small quantities to eliminate the disposal of large quantities of outdated, unused materials later. Every effort should be made to prevent chemical spills and accidents. Besides obvious safety considerations, spills increase waste generation and disposal costs. Properly labeling hazardous materials reduces the quantity of hazardous waste generated by eliminating the generation of unknowns.

**D. HANDLING HAZARDOUS WASTE - SECURING AND ACCOUNTING FOR HAZARDOUS MATERIALS**

1. The use of hazardous materials requires safeguards and increased security. Laboratories or other areas where hazardous materials are present, are not to be left open and unattended.
2. When not in use, hazardous materials are to be returned to their proper storage area. Storage areas in unattended spaces are to be locked.
3. Departments/Divisions/Units using and/or accumulating hazardous waste materials are responsible for maintaining an inventory of materials and routinely checking materials. Any hazardous materials missing or believed to have been stolen, are to be reported to Physical Plant (208-792-2247), as well as Campus Security (208-792-2815), and if appropriate (i.e., suspected theft) the Lewiston Police Department (208-746-0171). Inventories will be used to meet the Idaho DEQ requirement of periodically reporting **all** hazardous waste that is generated.

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**E. HANDLING HAZARDOUS WASTE - HAZARDOUS MATERIALS DISPOSAL PROCEDURES**

1. The following procedures are designed to help ensure that containers of hazardous materials are properly labeled, containerized and stored according to state and federal hazardous waste regulations.
2. First investigate whether or not processes using hazardous materials can be eliminated; or determine if alternative methods exist for processes that do not use hazardous materials.
3. Attempt to reduce the quantity, toxicity or other hazardous characteristic of materials being generated from processes that cannot be eliminated or substituted for by an environmentally safe process.
4. Evaluate hazardous materials characteristics to ensure that incompatible materials are not combined or stored near one another.
5. Do **NOT** dispose hazardous materials to the sanitary sewer system, atmosphere (i.e., evaporation), or solid trash receptacles.
6. Insure that proper containers are available to accumulate each waste stream in advance of actually conducting research, analyzing samples or starting a chemical process.
7. Properly label containers with words that accurately identify each container's contents.
8. Keep track of accumulations to the container (all constituents and their concentrations). A log book with entries referenced to unique container numbers is helpful.
9. Containers must always be kept closed between accumulations.
10. Minimize the accumulation of hazardous materials in your area by submitting materials and full containers to Physical Plant annually for disposal. Never accumulate more than 55 gallons of hazardous materials or one (1) liter of acute hazardous waste in a given area.
11. The Physical Plant will send out a campus wide Hazardous Waste Collection reminder annually in the spring. Departments/Divisions/Units generating hazardous waste must notify Physical Plant re: collection and/or disposal not later than June 1 annually. The Physical Plant will arrange for disposal services by June 30<sup>th</sup> of each year.