

Northwestern

Hazardous Waste Storage and
Disposal Guide

Environmental Health and Safety

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I. Purpose

This guide is to serve as a guide to safely handle and dispose hazardous waste, which is a product or material that is no longer of use with properties that make it potentially dangerous or harmful to human health or the environment; common examples include paint, contaminated glycol, and lamps.

II. Scope

This plan applies to non-research employees who handle and dispose hazardous waste at Northwestern University, including departments such as Art Theory and Practice, Athletics, Facilities Management, Library Preservation Lab, Residential Services, Wirtz Center Scene Shops.

III. Responsibilities

A. Environmental Health and Safety

- i. Oversee the development and implementation of the Hazardous Waste Storage and Disposal Guide
- ii. Assist and manage regulatory compliance for non-research areas.
- iii. Provide guidance during waste disposal processes.
- iv. Review and revise this plan to reflect changes in regulatory requirements as necessary.

B. Department Heads/Managers/Supervisors

- i. Complete Resource Conservation and Recovery Act (RCRA- an EPA regulation regarding handling, storing, and disposing hazardous waste) training, assign training to new employees prior to handling hazardous waste, and ensure training completion for all staff who may be participating in any hazardous waste disposal activity.
- ii. Assign Hazard Waste Coordinator responsibilities to designated faculty or staff and confirm approximately 2 hours/month, department depending, is allotted for these responsibilities.
- iii. Assign financial resources to support proper hazardous waste storage and disposal.

C. Hazardous Waste Coordinator

Each affected department will designate supervisory employees, managers, or other designates to verify:

- i. All hazardous waste containers and satellite accumulation areas are correctly labeled (see Section VII.B. for more information)
- ii. Conduct weekly inspections of satellite accumulation areas and central accumulation areas (See Appendix 2 for more information)
- iii. Request hazardous waste pick-ups with hazardous waste disposal vendor
- iv. If a new waste is introduced into the workplace, coordinate the development of a waste profile
- v. Inform contractors of potential hazards when working around hazardous waste
- vi. Complete Resource Conservation and Recovery Act (RCRA) training

D. Hazardous Waste Disposal Vendor

- i. Complete waste profiles for every hazardous waste stream.
- ii. Provide containers and supplies for handling and storing hazardous waste.
- iii. Conduct weekly inspections of all hazardous waste storage areas.

- iv. Coordinate with departments for each of their hazardous waste disposal pick-ups.
- v. If requested, provide annual RCRA Training to all affected employees.

IV. Hazardous Waste Containers

- A. Hazardous waste containers cannot exceed 55 gallons for each hazardous waste stream.
- B. Hazardous waste containers must include a label stating “Hazardous Waste,” the specific contents, and the collection date, which is when accumulating begins
- C. Hazardous waste containers must be placed in secondary containment (or spill decks) that allows for 10% of the total container volume or, placed on spill decks that allow for the entire volume of the largest container to be collected, whichever is greater.
- D. All containers must be kept closed except when adding hazardous waste
- E. Hazardous waste containers must be inspected and documented weekly and any deficiencies must be identified and corrected.

V. Satellite Accumulation Areas

A satellite accumulation area is a location at or near a point the of generation where hazardous waste is initially collected. Hazardous Waste Coordinators must ensure:

- A. Satellite Accumulation Areas are located in the areas where the waste is generated, away from ignition sources and incompatible chemicals and materials.
- B. Satellite Accumulation Areas must be inspected weekly, and any deficiency must be corrected (See Appendix 1 for more information).
- C. The area must include signage reading “Satellite Accumulation Area”
- D. When the hazardous waste container in the satellite accumulation area is full, it must be re-located to the centralized storage area within 3 days or, hazardous waste containers must be relocated to the centralized storage area after 180 days, regardless if the container is full.

VI. Centralized Storage Area Procedures

A centralized storage area is a location where an entire building’s hazardous waste is stored, where all similar waste streams are gathered in preparation of a pick-up and typically where hazardous waste pick-ups occur, and must comply with the following procedures:

- A. Designate a centralized storage area in each building generating hazardous waste, and ensure it is not near ignition sources or incompatible waste streams, and in a secure location to prevent unsafe access.
- B. The area must include signage reading “Hazardous Waste Storage Area”
- C. Centralized Storage Areas must be inspected and documented weekly, and any deficiency must be corrected (See Appendix 1 for more information).
- D. Hazardous waste may only be stored in the centralized storage area for a maximum of 90 days, at which time it must be picked-up for disposal or, hazardous waste that was re-located from a satellite accumulation area may only be stored in the centralized storage area for a maximum of 4 days, at which time it must be picked-up for disposal.

VII. Hazardous Waste Disposal Procedures

Hazardous waste can be disposed of by scheduling a pick-up per the following procedures:

- A. Contact hazardous-waste@northwestern.edu with the waste type, preferred pick-up date, and purchase order (PO) number
- B. There is a reoccurring bi-weekly pick-up that can consolidate department transportation costs when multiple pick-ups are scheduled on this day.
- C. See Appendix 1 for more information.

VIII. New Hazardous Waste Streams

When a department begins using a new material, a potential new waste stream is introduced, and the following procedures will apply:

- A. Contact hazardous-waste@northwestern.edu to schedule the completion of a waste profile.
- B. Ensure proper storage and handling requirements are in place.

IX. Training

All non-research employees who handle and dispose hazardous waste will be provided and are to complete RCRA training within 6 months of employment and annually thereafter, which includes:

- A. Hazardous waste listing and characteristics;
- B. Site-specific emergency response information;
- C. Procedures for waste-specific handling, storage, and disposal;
- D. Potential hazards of hazardous waste disposal, and how to protect oneself during the process; and
- E. Recordkeeping requirements.

X. Recordkeeping

- A. Training records of employees in non-research areas will be maintained by myHR Learn.
- B. The hazardous waste disposal vendor will maintain the following:
 - i. Hazardous waste profiles,
 - ii. Hazardous waste manifests,
 - iii. Regulatory compliance reports, and
 - iv. Weekly inspections.

XI. Regulatory Authority

Northwestern and contractors will comply with the Occupational Safety and Health Administration's (OSHA) standards and any other applicable codes and standards, including:

[Title 40 CFR 239 – 282, US Environmental Protection Agency Standards for Resource Conservation and Recovery Act \(RCRA\) Regulations](#)

XII. Contact

For questions, contact Environmental Health and Safety at ehs@northwestern.edu or Heritage Environmental Services (the hazardous waste disposal preferred vendor) at hazardous-waste@northwestern.edu.

XIII. Appendix 1 – Hazardous Waste Inspection Form

Weekly Hazardous Waste Inspection Checklist

Inspection Information

Container or area being inspected (number/contents/location):

Date and time:

Date last inspected:

Inspection completed by:

Hazardous Waste	Y / N	Corrective Action	Employee Responsible
Are containers properly and clearly labeled (“Hazardous Waste,” the specific contents, and the collection date)?			
Are containers tightly closed?			
Are wastes stored in compatible containers?			
Is there evidence of container deterioration?			
Are spaces between containers clear of debris?			
Are incompatible wastes properly segregated?			
Are there any signs of leaks or spills?			
Is spill response equipment adequate and accessible?			
Does each container have adequate secondary containment for its volume?			
If required, is an eyewash station accessible and ready for use?			
Are “Hazardous Waste” signs in place and clearly visible?			
Is a fire extinguisher in place and clearly visible?			
Are all waste containers stored inside the waste storage area?			
Is the total volume of wastes stored below the facility’s generator status?			
Are flammable wastes properly stored and grounded/bonded?			

Hazardous Waste Storage & Disposal Procedures

Identify Waste

- When any of the following materials require disposal, contact our Hazardous Waste Disposal Preferred Vendor, Heritage Environmental Services:
 - Rags used for solvents or oils
 - Light bulbs
 - Batteries
 - Pesticides
 - Paint, including pressurized aerosol cans
 - Mercury-containing equipment (i.e. old thermostats, mechanical switches)
 - Unknown materials

Containers & Labeling

- All hazardous waste containers must include a label stating “Hazardous Waste,” the specific contents, and the collection date, which is when accumulating begins
- All containers must be placed in secondary containment
- All containers must be kept closed except when adding hazardous waste
- All waste storage areas must include signage reading “Hazardous Waste Storage Area” or “Satellite Accumulation Area”

Weekly Inspections

- All hazardous waste containers and storage areas must be inspected weekly and documented
- Any deficiency identified must be included in the inspection and corrected
- An example of an inspection checklist can be found on Risk Management’s website

Disposal

- Provide a timeline of when the hazardous waste pick-up should be scheduled
- Heritage will provide a cost estimate
- Once approved, provide a PO for the pick-up to Heritage
- Heritage will coordinate the hazardous waste pick-up
- All hazardous waste will be handled and transported by Heritage staff during disposal

Recordkeeping

- Upon disposal, Heritage will complete and maintain documentation regarding total quantities disposed
- All supporting documentation, such as manifests, will be maintained by Heritage