

February 04, 2019

Hazardous Waste Generator Improvements Rule Changes

To: All Individual Generators of Hazardous and Chemical Waste

From: Samir Shahat, Director of Environmental Health and Safety

The EPA began enforcing a new rule that affects how the university must accumulate hazardous waste in laboratories, shops and any other location where hazardous waste is generated. Idaho DEQ started enforcing this rule in 2018. This new EPA rule is generally referred to as the “Hazardous Waste Generator Improvements Rule.”

Important specific changes that need to be implemented and followed by all individual generators of hazardous and chemical waste to ensure compliance with this new rule are listed below:

1. All areas where hazardous waste is generated must have a designated Satellite Accumulation Area (SAA) at or near the point of generation. The SAA must be dedicated to the sole purpose of storing hazardous waste that is either being accumulated or ready for collection by Environmental Health & Safety (EHS).
2. All SAAs must be labeled with the Hazardous Waste SAA sign provided by EHS.
3. SAAs should be at or near the point of generation of the waste. Waste **must not** be moved from one room to another.
4. SAAs cannot be established in a fume hood. Assign SAAs to locations out of the way of normal traffic, such as a corner of the lab, or in a chemical storage or other appropriate cabinet.
5. All containers used to accumulate hazardous waste **must** be labeled with the new hazardous waste 5164 Avery labels. The Avery 5164 hazardous waste label template for you to print can be accessed through the EHS website at: <https://www.uidaho.edu/EHS>. This label should be used as provided without alteration.
6. Waste stored in SAAs must be in a compatible (e.g., do not store acid waste in a metal tray) secondary containment tub or tray capable of holding the contents of at least the largest container stored in it.
7. All containers in the SAAs **must** have an appropriate label.
8. All containers of chemical waste (including unused chemicals submitted to EHS for disposal) **must** be clearly labeled with the words “Hazardous Waste” and an indication of the appropriate hazards.
9. Unused or expired chemicals submitted to EHS for disposal **should not** be labeled with the Avery 5164 hazardous waste labels. Instead, they should be immediately labeled with the waste label generated when a container is submitted to EHS through the online waste submittal application located on the EHS website. The link for submitting chemicals can be found at: <https://www.uidaho.edu/EHS>
10. The waste labels generated from the EHS submittal application will need to be attached to all containers once they have been submitted online, even if they have the hazardous waste Avery 5164 labels attached to them.

Please also find attached to this memo a guidance sheet to help implement these new rules in your area, and do not hesitate to contact EHS if you have any questions or concerns.