
The Waste-Paper

“Waste is a terrible thing to mind”

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EPA Inspecting Colleges and Universities in Our Region

Over the past few months, the US Environmental Protection Agency (EPA) has been conducting unannounced chemical waste inspections at colleges and universities in the state of New York. NY and NJ make up EPA Region 2 and the last time EPA Region 2 focused on colleges and universities, Princeton University was among the first in NJ to be inspected. We have every reason to believe that it is only a matter of time before they return to re-inspect us, even no violations or fines for hazardous waste during the 2001 inspection.

During the last round of college and university waste inspections, the EPA imposed fines that ranged from the tens of thousands to more than a million dollars. *As a reminder, fines from violations of EPA regulations are the responsibility of the department or laboratory where the violation occurred.*

In 2005, the University hired Woodard and Curran to conduct a comprehensive EPA-like inspection of our campus. Some issues pertaining to chemical waste were uncovered and have since been resolved. The University was already making arrangements to contract a similar inspection beginning this Spring, but it is possible that the EPA could arrive before then.

EHS will be conducting inspections of chemical and universal waste throughout the campus over the next several weeks to review current conditions and identify areas that might need attention. This will include all laboratories, shops and chemical storage areas, as well as universal waste storage – computers, fluorescent bulbs, recyclable batteries, etc.

Now is the time to go through your chemical use and storage areas, particularly those where chemical wastes are stored. The following guidelines should help to ensure that your practices comply with the state and federal regulations.

Chemical Storage

- All chemical containers must bear a label identifying the material(s).
- Chemicals that have no foreseeable use may be considered hazardous waste and should be disposed.
- Spill control materials should be available in areas where chemicals and hazardous wastes are used or stored.

Packaging and Labeling Hazardous Waste

- **The container must be in good condition.** Containers must be compatible with the waste and not be leaking, bulging, rusting, damaged or dented. Where such containers must be used, they must have secondary containment – either placed in another container or stored on a tray or basin that is capable of holding all of the contents in the event of a leak. *Potential fine: \$13,000 per container.*
- **Every container must be labeled "Hazardous Waste"** either with a yellow waste sticker available from EHS or written directly on the label or container. Non-specific labeling, such as "organic waste" is unacceptable. *Potential fine: \$6000 per container.*
- **Every container must have the chemical constituents clearly written on the label.** Trade names, chemical symbols and chemical structures are unacceptable. *Potential fine: \$6000 per container.*
- **Containers of hazardous waste must remain sealed except when filling.** The container must have adequate closure to withstand tipping over. Do not leave funnels in the containers. *Potential fine: \$5000 per container.*
- Empty containers can be triple rinsed and recycled or placed in regular trash. For acutely hazardous materials, the rinsate may need to be collected for disposal. See the EHS web page for more information - <http://web.princeton.edu/sites/ehs/chemwaste/mtcontainer.htm>.



*This Month's Waste Disposal Drop Off:
Wednesday, October 28, 2009*

Lewis Thomas loading dock

- Collection room open from 1:00 - 4:30 PM
- Coordinators: [Michael Fredericks](#) (8-1351) or [Mary Zikos](#) (x8-4095)

Jadwin Hall (Physics only)

- E-mail selwood@princeton.edu with the chemicals, quantity, location, contact person.

E-Quad Room 7 (E-Quad and Bowen)

- Collection room open from 2:00 - 3:00 PM
- Coordinators: [Joe Laskow](#) (8-4739) or [Joe Palmer](#)

Frick loading dock (Chemistry, Psychology, Vis Arts)

- Collection room open from 1:00 - 2:00 PM
- Coordinator: [Phil Fairall](#) (x8-3913)



Hazardous Waste Storage

- Incompatible wastes must not be stored together.
Potential fine: \$19,000
- If there are floor drains or sumps, waste containers must have secondary containment.
- The waste storage area must be near the point of generation and controlled by the generator.
- For wastes stored in fume hoods – if the hood has a cup sink, the waste containers must have secondary containment.
- No more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste may be stored in the laboratory or work area at any time. A list of acutely hazardous wastes is available at <http://web.princeton.edu/sites/ehs/chemwaste/mtcontainers.htm>.
- Containers must be stored such that the labels are clearly visible.

Things to Do to Prepare

- Check all areas where chemicals and hazardous wastes are used or stored to ensure compliance.
- Look at how you use and dispose of your chemicals to **be sure that hazardous wastes are not being poured down the drain, released to the air, or placed in regular trash.** The EHS web page, the Laboratory Safety Manual and the Laboratory Safety Training Guide all define what is a hazardous waste. **Consider posting regular procedures.**
- Go through all of your chemicals and determine whether or not they truly have a foreseeable use. Promptly dispose of any that do not.
- Ensure that all personnel know what to do in the event of an emergency.
- Ensure that all staff and students handling hazardous waste have attended Laboratory Safety or Hazard Communication training. EHS keeps attendance records for this training.
- Use this as a chance to consider ways to reduce or substitute chemicals that end up as hazardous waste.

Conduct during the EPA Inspection

It is very likely that if inspectors visit your work area, they will ask several questions about how you use and dispose of chemicals. It is advisable to be sure that someone from the Princeton audit team (Robin Izzo, Jim Boehlert, Steve Elwood or someone else from EHS) is present during the questioning. To ensure the best outcome, please adhere to the following guidelines:

- Don't offer information unless specifically asked.
- Don't argue with the inspectors.
- Don't complain about the regulations.
- Don't be pushed into giving an answer if you don't know. It is better just to say that you do not know.
- Don't be evasive. Answer the question as directly and succinctly as possible, if you know the answer.
- Don't lie to the inspectors or misrepresent what really happens in your area.
- Don't engage in speculation.
- If an inspector notes a problem in your area, correct it immediately, if possible, or outline plans for fixing the problem.

Questions or Concerns

Contact EHS with any questions. If you would like to schedule a special inspection, please contact Steve Elwood at 8-6271 or selwood@princeton.edu.



No Chemical Waste Pickup in November

Because of the holiday schedule, there will be no regular chemical waste pickup in November. The next hazardous waste pickup will be held on Thursday, December 10, 2009 (drop-off date Wednesday, December 9). December 10th will be the last pickup in 2009 and the only pickup until January 28th, 2010. Please make sure to dispose of any hazardous wastes you have accumulated before leaving for the holiday break.

Please contact EHS at 8-5294 if you have any questions about the waste pickup schedule.

<i>EHS HAZARDOUS WASTE CONTACTS</i>	
Main Office	8-5294
Jim Boehlert (Chemical Waste)	8-7882
Steve Elwood (Radioactive Waste)	8-6271
Tonya Gruchacz (Waste-Paper)	8-6255
Don Robasser (Biohazardous Waste)	8-6256
EHS Web Page http://www.princeton.edu/ehs	