

HAZARDOUS WASTE MANAGEMENT PLAN

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Environmental Health and Safety HAZARDOUS WASTE MANAGEMENT PLAN

I. Purpose

The purpose of this document is to present procedures to be followed to comply with the Resource Conservation and Recovery Act (RCRA) and New York State Environmental Conservation Law (ECL) Section 27-0900 et seq. and their regulations. This document compiles in one document many of the items necessary to document compliance with RCRA and New York ECL as they apply to hazardous waste. This document is also written to comply with the City University of New York (CUNY) Environmental Health and Safety Policy Manual, specifically the Hazardous Waste Management Policy and Procedures.

John Jay College of Criminal Justice (henceforth referred to as John Jay College) comprises of two fully occupied and three partially occupied buildings.

Fully Occupied Buildings: New Building – 524 W. 59th Street
Haaren Hall – 899 10th Avenue

Partially Occupied Buildings: Westport (1st and 2nd Floor) – 845 10th Avenue
BMW Building (6th Floor and 10th Floor) – 555 W. 57th Street
North Hall – 445 W. 59th Street

Hazardous wastes are generated both from academic sources and facility operations. Typical academic sources include chemistry and biology teaching and research laboratories. Additionally, Facilities Management also generate hazardous wastes, which can include wastes associated with painting, cleaning, and other maintenance operations and activities. Based on the current rate of generation, John Jay College is identified as a Small Quantity Generator of hazardous wastes.

The threshold criteria for identifying a generator’s hazardous waste category are as follows:

Category	Generation Quantity Limits
Conditionally Exempt Small Quantity Generator (CESQG)	≤ 100 kg/month (≤220.46 lbs/month) of non-acute hazardous waste
Small Quantity Generator (SQG)	>100 kg/month (220.46 lbs/month) to 1,000 kg/month (2,204.6 lbs/month) of non-acute hazardous waste and < 1kg acutely hazardous waste per month
Large Quantity Generator (LQG)	> 1,000 kg/month (>2,204.6 lbs/month) of non-acute hazardous waste or > 1 kg acutely hazardous waste per month

Note: These quantities are based on the rate of generation, not the rate of disposal.

II. Responsibilities

John Jay College of Criminal Justice faculty, staff, students, contractors, and other parties that handle or generate hazardous wastes are required to properly handle, store and label hazardous wastes and to comply with applicable federal and state regulations. They are responsible to follow the policies and procedures set forth in this Hazardous Waste Management Plan.

It is the responsibility of all faculty, staff, students, contractors and other parties to see that hazardous wastes are managed in a safe, healthy, and environmentally sound manner. The John Jay College of Criminal Justice Environmental Health & Safety (EHS), and college administration staff are responsible for ensuring that all parties who may or do generate hazardous waste on campus comply with these requirements.

Included among the responsibilities of EHS is the oversight of hazardous waste management services at John Jay College. These services include the determination of whether or not a waste is a hazardous waste, and waste pickup, storage, and shipment.

Under federal and state regulations, generators of hazardous waste are accountable for the management of these wastes from cradle-to-grave, that is, from their point of generation to their ultimate disposal. This responsibility includes taking steps to minimize the amount of waste generated, and to minimize the release of hazardous waste. Civil and criminal penalties may result from failure to comply with these requirements. At John Jay College, generators of hazardous wastes may be academic facilities such as laboratories, as well as various facility operations. While John Jay College is responsible for maintaining compliance, a student, faculty member, staff person, supervisor, or department head could have individual liability in the event of a violation of environmental requirements. Personnel from federal or state environmental regulatory agencies have the authority to inspect laboratories, storage areas, and other related locations on campus for compliance with applicable regulatory requirements at any time.

Within the CUNY and John Jay College system, the following responsibilities are identified.

The John Jay College President is responsible for:

1. Implementation of the Hazardous Waste Management Policy and Procedures at John Jay College.
2. Communicating the importance of the Hazardous Waste Management Policy and Procedures throughout the organization.
3. Adherence to the CUNY Compliance Enforcement Policy.

The John Jay College Vice President for Finance and Administration is responsible for:

1. Providing adequate human, fiscal, and administrative resources to help assure compliance with hazardous waste regulations and the Hazardous Waste Management Policy and Procedures.
2. Tracking and reviewing hazardous waste compliance performance.
3. Ensuring that the Dormitory Authority of the State of New York (DASNY) and EHS interact to support hazardous waste compliance in construction projects.

The John Jay College Science Department Chair is responsible for:

1. Communicating the importance of the Hazardous Waste Management Policy and Procedures throughout their respective departments.
2. Assuring that departmental staff and facilities comply with these policies.
3. Notifying EHS 30 days prior to a large laboratory chemical clean-out.

The John Jay College EHS is responsible for:

1. Reading and understanding federal, state, and city laws, rules, and regulations relating to hazardous waste and for staying current with changes in the laws, rules, and regulations.
2. Overseeing the development of John Jay College's Hazardous Waste Management Plan, to achieve the goals of CUNY's Hazardous Waste Management Policy and Procedures, and to address the particular needs of John Jay College with respect to the management of hazardous wastes.
3. Interfacing with federal, state and New York City regulatory agencies.
4. Implementing John Jay College's Hazardous Waste Management Plan.
5. Maintaining required documents and records of hazardous waste training, generation, shipment, and disposal.
6. Directing training of faculty, staff, students and contractors at John Jay College for the performance of their tasks as they may relate to hazardous wastes in an efficient and competent fashion, and the provision of instruction regarding the impact that their activities can have on the environment if performed incorrectly.
7. Conducting regular inspections of areas where hazardous wastes are stored to ensure that hazardous wastes have been properly identified, labeled, segregated, and stored for collection and disposal, and to prevent the accumulation of old, unused, or abandoned chemicals.
8. Awareness of the current legal requirements concerning hazardous waste disposal and to contact the CUNY Office of General Counsel when questions arise.
9. Managing the arrangement of hazardous waste pickups and to ensure that disposal is safely and completely performed.
10. Attending DASNY project meetings to convey requirements related to hazardous waste management responsibilities at John Jay College, including DASNY's (or DASNY's contractors) training, storage, and disposal manifest responsibilities.

John Jay College personnel who use or generate hazardous materials or wastes are responsible to:

1. Read and understand, to the extent appropriate to their work, this Hazardous Waste Management Plan, and associated RCRA documentation.
2. Actively participate in John Jay College's waste minimization program by conducting their work in a manner to minimize potential adverse environmental impacts resulting from their work.
3. Store chemicals in accordance with prudent laboratory practice.
4. Plan activities/experiments to consume, to the extent feasible, all hazardous materials and to minimize the amount and toxicity of waste materials produced.
5. Be familiar with the properties, health risks, and precautions required for handling their respective hazardous waste streams.

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6. Become familiar with data concerning chemicals used including information available in reference books, technical journal articles, Safety Data Sheets (SDSs), and pertinent John Jay College standard operating procedures (SOPs).
7. Select and use all appropriate personal protective equipment (PPE) (e.g., gloves, goggles, lab coat, or other measures as may be applicable) required to safely work with hazardous materials.
8. Use proper engineering controls such as fume hoods, secondary containment and self-closing funnels to minimize exposure and hazards.
9. Contact EHS with any questions regarding chemical or waste management, including training, chemical/waste identification, regulations, reference materials or other aspect of chemical or waste management.

DASNY:

1. DASNY has responsibility for hazardous waste that it or its contractors generate during a given project on campus.

Hazardous waste storage:

1. DASNY and its contractors are to coordinate, in advance and throughout the project, with EHS to evaluate environmental implications of project activities; establish specific environmental regulatory responsibilities with respect to any and all DASNY projects. EHS will verify that compliance is being maintained;
2. DASNY is to use its own EPA Identification Number, and establish hazardous waste storage areas, train its personnel (or contractors), have a contingency plan, and comply with applicable RCRA requirements, and ensure that its contractors comply with the requirements. Copies of training records, hazardous waste manifests, etc. must be provided to EHS for the purpose of confirming compliance; and
3. Hazardous waste generated by DASNY is to be clearly segregated from John Jay College's hazardous waste while in storage.

Hazardous Waste Manifests:

1. DASNY personnel cannot sign manifests that use John Jay College's USEPA identification number.
2. All faculty, staff, students, contractors and other parties (including DASNY and its contractors) engaged in activities on the John Jay College campus are subject to periodic internal environmental assessments of their facilities by John Jay College's EHS, by CUNY personnel, or a third party engaged by John Jay College or CUNY. If issues of non-compliance with policies of CUNY or John Jay College are discovered during the course of an audit/assessment, responses are required. Depending on the severity of the non-compliance, additional disciplinary actions may take place.

III. Hazardous waste management

Handling hazardous chemicals and wastes requires the use of proper laboratory safety procedures. If there are any questions or doubts regarding hazardous waste management, chemical waste management, or chemical management, contact EHS, Ext. 4117.

This section provides information on:

- How to properly identify a hazardous waste if generated;
- How and where hazardous waste must be accumulated and labeled in your work area;
- Hazardous waste pickup procedures from your area to the Main Accumulation Area (MAA);
- How hazardous waste must be stored and packaged for shipment;
- Hazardous waste disposal; and
- Inspections.

A. Hazardous waste generation, identification, and determination

Hazardous Waste Generation

The success of the hazardous waste management program begins with individuals that generate hazardous wastes being aware of their responsibilities. Proper hazardous waste management begins with the accurate characterization of wastes. Following characterization, hazardous wastes must be properly packaged, labeled, and stored at the accumulation points until they are moved to the on-site hazardous waste storage area. Chemical wastes must be properly identified and documented to prevent the generation of unknown waste materials.

A John Jay College hazardous waste label available on the EHS webpage under labels on <http://www.jjay.cuny.edu/safety> must be applied to each waste container when first put into use (see Appendix A).

A completed label identifies the lab room number, name and phone number of the PI/Class, the name of the person labeling the waste, the contents with ingredients spelled out (no abbreviations or formulas), the date the bottle is filled and ready to move to the MAA and the RCRA characteristics checked off, if any. If in doubt with any aspect of the waste identification or labeling, call EHS at Ext. 4117 for guidance.

Every effort should be made to minimize the amount of hazardous waste that is generated. Every individual who will handle or generate laboratory waste must receive training in the safety procedures for chemical storage and waste management outlined in *Section VIII* of this Plan. This training is arranged by EHS; email Mircea Comanescu, mcomanescu@jjay.cuny.edu, to schedule your training if you have not received this training or are unsure as to whether you should receive this training.

Hazardous Waste Identification

At John Jay College, hazardous wastes are generated in two types of areas: academic settings (such as laboratories), and facility operations (such as maintenance operations). A waste is any solid, liquid, or contained gaseous material that is discarded by being disposed of, burned or incinerated, or recycled. There are some exceptions for recycled materials. Even materials that are recyclable

or can be reused in some way (such as burning solvents for fuel) might be considered waste. If you are recycling waste materials, contact EHS, Ext. 4117, so that the recycling can be performed and documented in accordance with applicable regulations.

Hazardous waste can be one of two types:

1. **LISTED WASTE**

A solid waste is considered hazardous if it appears on one of the lists published in the federal regulations at 40 CFR Part 261 and in the New York State regulations at 6 NYCRR371. These five groups include:

F – Listed Hazardous Waste from Non-specific Sources (40 CFR Part 261.31 and 6 NYCCR Part 371.4 (b)).

These wastes are designated with a four-digit code beginning with the letter "F". Typical wastes that John Jay College may generate that are considered F-wastes include spent solvents from laboratory operations. These wastes are typically designated as one of the F001 through F005 listings.

K – Listed Hazardous Waste from Specific Sources (40 CFR Part 261.32 and 6 NYCCR Part 371.4(c)).

These wastes are wastes generated from specific industrial sources, such as wastes from petroleum refining. These wastes are designated with a four-digit code beginning with the letter "K." John Jay College does not currently generate these types of waste streams.

U – Listed Hazardous Wastes which are Discarded, Commercial Chemical Products, or Off-Specification Commercial Chemical Products or Spill Residues (40 CFR Part 261.33(f) and 6 NYCCR Part 371.4(d)(6)).

These wastes are typically:

- (1) virgin chemicals or hazardous materials that are intended to be discarded;
- (2) formulations in which the sole active ingredient is the listed constituent; and
- (3) spill residues and debris contaminated with the spilled material.

These wastes are designated with a four-digit code beginning with the letter "U."

P – Listed Acute Hazardous Wastes (40 CFR Part 261.33(e) and 6 NYCCR Part 371.4(d)(5)).

These wastes are similar to the U-listed wastes but are considered acutely hazardous and are designated with a four-digit code beginning with the letter "P." In addition to the P-wastes, certain Hazardous Wastes from Non-specific Sources (F020, F021, F022, F023, F026, F027 and F028) are also considered acute hazardous wastes. Examples of acutely hazardous waste include streams which have been generated at other CUNY campuses. These include sodium cyanide (P-106) and osmium tetroxide (P-087).

NY Listed PCB Hazardous Wastes (6 NYCCR Part 371.4(e)).

In New York State, wastes containing greater than 50 parts per million (ppm) by weight or greater of polychlorinated biphenyls (PCBs) are listed hazardous wastes. The NYSDEC has segregated this PCB waste stream into seven categories (B001 through B007).

Currently, more than 500 hazardous wastes are listed. Consult EHS for assistance when conducting a waste stream determination and in reviewing the regulatory exclusions prior to finalizing your determination.

2. **CHARACTERISTIC WASTES**

If the waste does not appear on one of the hazardous waste lists, it still might be considered hazardous if it demonstrates one or more of the following characteristics:

Ignitability (40 CFR Part 261.21 and 6 NYCCR Part 371.3(b))

The waste catches fire under certain conditions. Ignitable waste streams include: liquids with a flashpoint less than 140° F; non-liquids which burn and cause fire under normal temperature and pressure; ignitable compressed gas; or a DOT oxidizer. Examples are some solvents, paints and degreasers. These wastes are designated with the four-digit code D001.

Corrosivity (40 CFR Part 261.22 and 6 NYCCR Part 371.3(c))

The waste corrodes steel at a rate of greater than 0.25-inches per year at 55°C (130°F) and/or has a pH less than 2 or greater than 12.5. This is known as a corrosive waste. Examples are some acids, caustics, or cleaning fluids. These wastes are designated with the four-digit code D002.

Reactivity (40 CFR Part 261.23 and 6 NYCCR Part 371.3 (d))

The waste is unstable and explodes, or produces toxic fumes, gases, and vapors when mixed with water or under other conditions such as heat or pressure. This is known as a reactive waste. Examples are certain cyanides or sulfide-bearing wastes. These wastes are designated with the four-digit code D003.

Toxicity (40 CFR Part 261.24 and 6 NYCCR Part 371.3 (e))

The waste is harmful or fatal when ingested or absorbed by an organism. A waste stream that contains one of the listed forty (40) toxic chemicals that will leach into the soil or ground water when disposed of on land above the specified concentration is known as a toxic waste. Examples are wastes that contain high concentrations of heavy metals, such as cadmium, lead, or mercury. These wastes are designated with the four-digit code D004 through D043, depending on the constituents.

For more information, contact EHS, Ext. 4117.

Currently, the lists of hazardous substances in New York State may be found at the following internet location:

[https://govt.westlaw.com/nycrr/Document/I1f4946a2d53f11e59539f2405ce416c1?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/nycrr/Document/I1f4946a2d53f11e59539f2405ce416c1?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

Unidentified Waste

If a source (e.g., a laboratory or studio) has a container with unidentified contents, all available information on the material should be gathered by the faculty, student, and/or staff member. This information may be helpful in narrowing the steps needed to suitably identify the material.

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Identification of unknown materials, which often involves special laboratory characterization, can be an expensive, time consuming, and potentially dangerous process. Any information that can narrow the potential range of waste materials can be useful. Besides safety issues, costs for classifying even small amounts of unknown materials are significant and can range up to several thousand dollars. In many cases, personnel in a research group can, by process of elimination and knowledge of lab operations, provide valuable information on the chemical constituents.

Laboratories must manage unknown materials with great care. Containers must not be moved or opened when there is any question as to the safety of such an operation. This is because some materials are friction or shock sensitive and even the act of opening the cap can cause a violent reaction. The laboratory must be able to certify that the container does not have highly reactive or explosive components.

EHS or the Director of Laboratory Operations will make the final determination of whether or not a waste is a hazardous waste. EHS or the Director of Laboratory Operations will also assist in this identification process. However, the laboratory staff must provide the background information. Reasonable attempts to identify unknowns must be made by the laboratory personnel. If highly reactive materials cannot be ruled out, laboratory staff must not handle the material, and EHS/the Director of Laboratory Operations will arrange for proper identification and disposal through the College's Waste Vendor.

As best practice, all John Jay College's non-municipal solid waste is disposed of through our hazardous waste vendor even if a hazardous waste determination deems the waste as a non-regulated toxic. The waste is disposed of as a non-regulated toxic.

It is important to note that the best way to prevent the generation of unknown waste materials is to properly use, label, and manage chemical materials and byproducts, including solutions and mixtures prepared on campus, as required by the John Jay Hazard Communication Program, the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR Regulations 1910.1200) and the NYS Right to Know Standard (12 NYCRR Part 820). Refer to the College's Hazard Communication Program for more information.

If a faculty member should leave the college for any reason, EHS and the Director of Laboratory Operations must be notified immediately so that plans can be made for the reassignment or proper disposal of chemicals and wastes under the responsibility of that faculty member.

Hazardous Waste Determination

EPA requires that an evaluation be made for unwanted chemicals to determine if they are hazardous waste or non-regulated chemical waste. Both are disposed of through our hazardous waste vendor. This is called a hazardous waste determination and shall be completed as such:

- Whenever any chemical waste (new chemical waste or waste mixture) is generated, the individual generating the waste or overseeing the waste must make the waste determination by checking off the characteristics (if any) of the hazardous waste. Prior to disposal, EHS will receive a list of all the chemicals that need to be disposed of and will make the final

evaluation as to whether the waste is listed or characteristic hazardous waste, or non-regulated.

- The college's hazardous waste vendor handles both hazardous waste and non-regulated chemical waste.

B. Hazardous waste packaging and labeling

Every member of the campus community is responsible for the proper management of wastes. Containers used to store hazardous wastes at satellite accumulation areas (SAAs) must be labeled with a written description of the waste material and the words "Hazardous Waste." A John Jay College hazardous waste label must be applied to each waste container when first put into use. These labels are available on the EHS webpage under labels <http://www.jjay.cuny.edu/safety> (see Appendix A). A completed label identifies the lab room number, name and phone number of the PI/Class, the name of the person labeling the waste, the contents with ingredients spelled out (no abbreviations of formulas), the date the bottle is filled and ready to be moved to the Main Accumulation Area (MAA) and the RCRA characteristics checked off, if any (see Appendix A). For example, the words "Sulfuric Acid" should be written on the label. The formula H_2SO_4 by itself is not sufficient as a label description, nor should it be written after the spelled out chemical name. Keep containers **TIGHTLY CLOSED** except when adding material to them. This is to prevent spills, leaks, fires, and the release of fumes and is **required** by state and federal regulations. Each container must contain compatible wastes (see waste categories listed on the next page). Segregate containers according to the compatibility of their contents and use separate secondary containment as necessary, segregated by compatibility of the wastes. Secondary containment devices such as trays, tubs, or buckets should be able to contain the contents of the largest container, if ruptured.

The first step in the waste disposal process involves obtaining a suitable container for the waste. Use the following guidelines when selecting a container:

- Use plastic or glass containers compatible with the waste
- Containers must have a secure cap
- Empty containers in which the chemicals were supplied are usually adequate
- Containers must be clean and free of residue that might react with waste
- Container must be in good condition – DO NOT USE rusted, dented or degraded containers
- 5-gallon or larger containers must be approved by EHS or the Director of Laboratory Operations
- Do not use beakers, or other labware, coffee cans, plastic milk jugs, soda bottles, or any container that resembles a drinking glass, cup, or mug, etc.
- Do not use rubber stoppers, corks, or glass stoppers
- EHS or the Director of Laboratory Operations will assist with container selection for new waste streams
- Do not use containers that formerly contained P-listed wastes
- DO NOT store incompatible wastes in the same container. These wastes must be collected and stored in separate containers. If there is any suspicion that mixed waste materials may

react, or are incompatible in any way, these materials should not be combined, and should be kept segregated.

- Use separate containers for each of the following types of waste:
 - halogenated organic solvents
 - non-halogenated organic solvents acids
 - bases
 - heavy metals
 - mercury
 - reactives
 - oxidizers
 - toxic (poisons)

If you do not know the category of a waste, or you are unsure whether you should mix wastes, consult the SDSs and contact EHS, Ext. 4117, or the Director of Laboratory Operations, x8893.

A funnel may help prevent spills when adding waste to containers. If used, the funnel should be clean and free of residues. Do not leave a funnel in a container's opening, unless the funnel is permanently attached and can be capped while not in use. The Director of Laboratory Operations can help you obtain one of these funnels if it is appropriate to your use.

Wide mouth containers may be used in place of funnels. Segregate waste containers according to chemical compatibility just as you would unused chemicals. Flammables, oxidizers, reactive materials, corrosive acids and bases must be stored separately. Reactive and ignitable wastes must be protected from sources of reaction and/or ignition and are grounded. Use secondary containment for all hazardous wastes. Secondary containment may be a tray, pan, bucket or other container capable of holding the contents of the primary container. Secondary containment also aids in separating incompatible waste and in containing leaks and spills.

It is good practice for all empty chemical containers to be triple-rinsed with water or with a solvent capable of removing the original material. In some cases, such triple rinsing is required or else the container itself is hazardous waste. Follow the specific procedures below depending on whether the container is to be reused or disposed of.

Empty Container Management

Never re-use a container that previously contained an acutely hazardous material (check the F- and P-lists).

If the container previously held a hazardous chemical or waste and *will not be reused*:

- Complete draining of the contents of the container for its original use
- Triple-rinse the container with water or an appropriate solvent. Rinse solvent (rinsate) may require collection as hazardous waste. Contact EHS or the Director of Laboratory Operations for guidance. Whenever possible, reuse the rinse solvent for cleaning until it is spent
- Use fresh solvent only for the final rinse
- Remove or permanently mark over the old label and

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- Mark the container with the words “This Container is Triple Rinsed and Safe for Disposal” and dispose of properly.

If the container *will be reused* for a chemical (not waste):

- Reuse the container only with compatible new materials and
 - Clearly re-label the container with the full chemical name of the contents
 - Include a hazard warning if appropriate (e.g., corrosive, flammable, etc.)

If the container *will be reused* for a hazardous waste:

- Reuse the container only with compatible waste
- Remove the original label and
- Clearly re-label the container with the full chemical name of the contents using EHS-supplied hazardous waste labels (see Appendix A).

Call EHS or the Director of Laboratory Operations to arrange for disposal of large containers, containers contaminated with highly toxic or acutely toxic materials and other containers about which you may have questions.

C.Satellite Accumulation Areas (SAAs)

Federal and state regulations require that the hazardous waste must be accumulated at or near the point of generation. In laboratories and other work locations where hazardous wastes are generated, such areas are referred to as “Satellite Accumulation Areas” (SAAs). Waste must be accumulated in the room or laboratory where they were generated. Waste generated in multiple rooms should not be centrally accumulated in one room/laboratory. A general rule of thumb is that you must be able to see the waste containers from the point of generation and waste should not be moved through doorways. SAAs in laboratories are typically located in fume hoods or under sinks. Waste containers and secondary containment containers should be positioned so that they do not block vents and potentially inhibit proper airflow. Waste containers can be stored in cabinets under fume hoods as long as they are being stored with other compatible chemicals. Waste containers should not be stored on the floor where they could create a tripping hazard and result in spills. Store all wastes with attention to the New York Fire Department (FDNY) flammable quantity storage limits, compatibility with other chemicals, and general prudent laboratory practice.

The containers holding the waste must be maintained in good condition (e.g., no rust or structural defects). If a container begins to leak, the contents must be transferred to another container in good condition. Hazardous waste must be collected in a container that is compatible to prevent damage to the container and leakage of the hazardous waste. As previously discussed, hazardous waste containers must be kept closed except when waste is being added. Hazardous waste containers should be kept in an SAA that is marked with the Hazardous Waste Satellite Accumulation Area sign provided by EHS or the Director of Laboratory Operations (see Appendix B). Before moving the SAA or adding another area, EHS or the Director of Laboratory Operations must be contacted so that the area may be documented and properly posted.

Each SAA can accumulate up to a total of 55 gallons of hazardous waste, or up to one quart of acutely hazardous wastes. Most laboratories will call for a pick-up before these quantities are

reached. However, if these limits are reached, the generator must label the container with the date the accumulation limit was reached (when the container was filled) and the wastes must be moved to the Main Accumulation Area (MAA) within three days. SAAs should be inspected regularly by the laboratory PI or their designee, and/or by the Director of Laboratory Operations or their designee to help ensure that the containers are properly stored, not leaking, and that the area is in compliance with the requirements outlined in this section. An SAA inspection log sheet should be used, which is included as Appendix C.

Hazardous wastes produced by the Science Department are brought directly to the Main Accumulation Area **only** by authorized, trained personnel.

D. Hazardous waste pickup procedures

Before requesting a chemical waste pickup, make sure you have followed the procedures previously discussed regarding container selection, labeling, handling, and storage for hazardous waste. Make sure containers are clean on the outside and have caps that are tightly closed, and are properly labeled. If a label is deteriorated, replace it. The waste will not be picked up until *appropriately* labeled for disposal.

Call the Directory of Laboratory Operations, Natalya Timmer, to have a designated CLT available to accept containers in the Main Accumulation Area.

Be ready to give the following information:

- your name
- phone number
- department
- room number
- the type and quantity of waste to be picked up size of containers to be picked up
- physical state of the material

E. Hazardous waste storage area/Main Accumulation Area

The Science Department's hazardous waste storage area, NB 4.62.07, is the Main Accumulation Area (MAA). The MAA is the storage location for the hazardous wastes prior to being shipped off campus. A current inventory of the wastes collected is to be continuously maintained by the Director of Laboratory Operations. Proper labeling and segregation techniques are to be employed. The area is to be properly identified as a Hazardous Waste Storage Area by the Director of Laboratory Operations and EHS and have limited access to personnel having specific assignments and have "No Smoking" signs posted.

Operation of the hazardous waste storage area requires the following:

- Documentation that the waste in the area is stored for less than 180-days
- Labeling of the containers with the contents, the start date, and other required wording
- Segregation of incompatible wastes
- Storage of waste in compatible containers

- Drums are stacked no more than two high along with adequate aisle space between rows
- Containers are kept closed except when adding or removing wastes
- Spill kits and emergency equipment is available
- A means of communication and Personal Protective Equipment (PPE) are readily available
- Weekly inspections of the Main Accumulation Area are conducted and documented (see Appendix D). The MAA weekly log is periodically scanned and sent to EHS for recordkeeping purposes
- Measures to minimize the potential for a release are implemented
- Ignitable waste containers are to be grounded
- Posted signage show the locations of:
 - emergency equipment (fire extinguisher, spill material, emergency eyewash/shower, etc.)
 - instructions for reporting fire, spill, release

At the time the waste is generated, it must be labeled as a hazardous waste. As John Jay College is a SQG, after waste pickup and transfer to the MAA, the waste is subject to a 180-day accumulation time limit. At no time shall hazardous waste be stored in excess of the 180-day period. Extension of this time frame may occur only when situations beyond the control of the campus prevent the timely removal of the waste. Only EHS or the Director of Laboratory Operations, in conjunction with the campus administration, shall have the authority to extend the storage time. In the event that storage over 180-days occurs, written notification must be made immediately to the NYSDEC.

F. Hazardous waste disposal procedures

The selection of a contractor for the removal, transportation, and/or disposal of hazardous waste will be conducted in a thorough and safety-conscious manner. Prospective contractors must address all safety issues raised by John Jay College before an authorization is awarded. CUNY's EHSRM is the only entity that can engage a hazardous waste disposal firm, and will follow CUNY guidelines in selection of a waste vendor, and will evaluate the compliance and financial resources of the waste disposal firms. John Jay College's EHS will be following purchasing procedures.

G. Inspections

EHS, the Director of Laboratory Operations, or designated representative must perform inspections of the hazardous waste storage area in compliance with USEPA and NYSDEC regulations.

H. General practices

Treatment

Although treatment of hazardous waste without a permit is prohibited by federal and state regulations, "elementary neutralization" is allowed. That is, waste that is hazardous only because of its corrosive characteristics (and is not toxic, ignitable, reactive, or a listed waste), may be neutralized by the addition of bases or acids (as appropriate), producing a waste that no longer meets the corrosivity characteristic criteria (see Section II.A.2., above). Only experienced personnel should conduct neutralization procedures.

Sanitary sewer disposal

Some materials can be safely discharged into the sanitary sewer. However, some materials can cause explosive conditions within the sewer system, damage the environment, or interfere with the operations of the wastewater treatment plant.

It is the policy at John Jay College that no materials (liquids or solids) can be disposed of into drains.

EHS or the Director of Laboratory Operations will make the necessary waste determination and dispose of the material, as appropriate.

I. Other hazardous waste management

Mercury waste

Elemental mercury can be recycled; EHS should be contacted to evaluate this option. Mixtures of mercury compounds and other wastes are difficult waste streams to dispose of. Thermometers and measuring instruments containing mercury should be replaced with equipment that uses non-hazardous fluids or electronic devices. Call EHS to collect the old devices, including mercury thermometers, for proper disposal as hazardous wastes. If a mercury spill should occur, immediately contact the EHS.

Flammable and combustible waste

Flammable and combustible liquids include turpentine, mineral spirits, naphtha, petroleum distillates, oil-based paint, adhesives, and others. If a material is suspected of being flammable or combustible, check labels or the appropriate SDS.

If the flash point of a waste material is at or less than 140°F, the material is a hazardous waste due to its ignitability and must be disposed of as a hazardous waste. Flammable waste liquids should only be collected in a designated and approved flammable liquids waste safety can. Call EHS for questions about waste cans.

Oily rags and rags or paper soaked with flammable liquids must also be collected in designated flammable waste disposal cans. **OILY OR SOLVENT SOAKED RAGS CAN SPONTANEOUSLY IGNITE.** Notify EHS or the Director of Laboratory Operations for a pickup when waste containers become approximately 80% full.

Never dispose of flammable liquids down the drain since vapors in an enclosed sewer system can result in potentially explosive or flammable conditions. City, state, and federal sewer regulations also prohibit the disposal of ignitable wastes in the sewer system.

Paint, pigments, and finishes

Paint, varnish, stain, finish, or sealant may be flammable or contain heavy metals such as lead, chromium, arsenic, or cadmium. Paint and pigment-containing hazardous materials must not be put in the regular trash. Call EHS to arrange for a waste pickup of expired or unwanted paint, pigments, varnish, stains, finish, or sealants. Empty paint containers (with no free

liquids) of oil-based paints may be placed in the regular trash. Be sure there are no metal-containing pigments present. Contact EHS for assistance with checking labels for hazardous materials.

Ceramics

Clay and glazes may contain heavy metals such as lead, arsenic, barium, cadmium, chromium, and selenium. When a clay or a glaze containing these materials is discarded, it must be handled as hazardous waste. When arranging disposal of these materials, check labels to determine if the clay or glaze contains hazardous materials. When possible, use lead-free clay and heavy metal-free glazes.

Electronic Waste

Electronic wastes (E-waste) are unwanted items that have an electrical cord or are powered by batteries. Examples are televisions, monitors, computers, radios, audio and stereo equipment, fax machines, printers, scientific equipment, etc. They are not disposed of with regular trash. Battery powered-devices such as radios and other electronics are also disposed of as electronic waste once the batteries have been removed. Unwanted electronic equipment must not be disposed of in the trash or abandoned in storage rooms or other locations.

Electronic wastes are managed by the Department of Property Management. Contact the Property Management Administrative Specialist (x8219) loperillo@jjay.cuny.edu to schedule electronic waste disposal and/or to track transfer/disposal of sensitive equipment.

For more information, see the Property Management website: <https://www.jjay.cuny.edu/property-management>

Etching

Acids and bases used in etching are corrosive materials; they must **NOT** be poured down the drain. Waste acids may also contain metals such as zinc and copper. Heavy metal disposal to the sewers is regulated. Collect and store waste acids using the original containers in which they were supplied. Obtain hazardous waste labels here <https://www.jjay.cuny.edu/plans-manuals-forms-waste-labels-other-resources#Forms>. Fill out the label with the requested information. Do not fill containers completely; leave about two inches of headspace to prevent buildup of pressure.

Lead

Lead waste at John Jay College includes lead dust and pellets produced by the John Jay Athletics Air Rifle class and Rifle team practices. Lead waste is disposed of through John Jay's hazardous waste vendor. Contact EHS if there is any lead waste for disposal.

The Department of Information Technology produces lead waste in the form of lead acid batteries. Lead acid batteries are disposed of as universal waste. Contact EHS regarding disposal.

Waste Photographic Fixer

Waste photographic fixer often contains silver, a valuable metal that should be recovered. New York City prohibits the disposal of photographic solutions down the drain. Waste fixer must be treated in a silver recovery unit (for recycling) or collected and managed as a hazardous waste. Contact EHS to arrange for the installation or maintenance of a silver recovery unit.

Photographic Stop Baths and Developer

Stop baths and developers may contain hazardous waste; these solutions must not be poured down the drain since they may result in exceedances of New York City Sewer Use Ordinance discharge limitations. Check labels and SDSs to determine if there are metals in the solutions and ask EHS for help with determining whether hazardous materials are present.

Although most of these materials are not considered hazardous waste, they must be at a neutral pH prior to disposal through a drain. Collect stop bath and developer solutions using containers in which they were originally supplied. Do not fill containers completely; leave about two inches of headspace to prevent buildup of pressure.

Regulated Medical Waste

Please refer to the John Jay College Bloodborne Pathogens Exposure Control Plan, Chapter IV (f) Regulated Medical Waste for procedures on the storage, handling, and disposal of Regulated Medical Waste at John Jay College.

J. Universal Wastes

The Universal Waste Rule was written to streamline environmental regulations for wastes generated by large numbers of businesses in relatively small quantities. It is designed to reduce the amount of hazardous waste disposed of in municipal solid waste, encourage the recycling and proper disposal of certain common hazardous wastes, and reduce the regulatory burden for businesses that generate these wastes.

Universal wastes are items commonly thrown into the trash by households and small businesses. Although handlers of universal wastes can meet less stringent standards for storing, transporting, and collecting these wastes, handlers must still comply with the full hazardous waste requirements for final recycling, treatment, or disposal. By providing a waste management structure that removes these wastes from municipal landfills and incinerators, this rule ensures stronger safeguards for public health and the environment.

John Jay College has a separate document entitled Universal Waste Instructional Manual and Quiz. Please refer to that plan for details of universal waste management on campus.

Universal waste management includes:

1. Battery recycling and disposal:

Batteries contain hazardous components that must not be disposed of in the regular trash. Specially designed battery collection containers are available from EHS. Containers that remain in good condition are reusable. Containers should be placed in central locations that are easily accessible to generators of used batteries. Contact EHS, Ext. x4117 for waste battery pickup when the containers are full. Collect only the following batteries in battery collection containers:

- Rechargeable batteries such as nickel-cadmium type; and
- “Button” batteries found in watches, calculators, pagers, and cameras.

Note: Alkaline and non-alkaline “household” batteries (i.e., AAA, AA, C, D, and 9-volt) are not currently considered a hazardous or universal waste and are not collected by EHS.

The following items should NOT be placed in battery collection containers:

- Leaking batteries - these should be attended to immediately. Call EHS for assistance.
- Batteries containing liquids, (e.g. car batteries), or large batteries, (e.g. rechargeable camcorder, or cellphone batteries).
- Other batteries not listed above.

Call EHS to arrange for the proper handling and disposal of these types of batteries.

2. Fluorescent and LED lamp disposal program

There is a fluorescent lamp disposal program for the management of fluorescent bulbs on campus. Most used fluorescent lamps are classified as hazardous waste. The inside of a fluorescent tube is coated with chemicals and the tube contains a small amount of mercury vapor. Fluorescent lamps should not be placed in the regular trash. Use fluorescent lamps must be disposed of by contacting EHS.

Similarly, LED lamps are considered possibly hazardous as they may contain lead in the solder. As such, they must be disposed of as universal waste in a similar manner as fluorescent lamps.

3. Pesticides

Pesticides are not applied by any John Jay employee. This work is done by a John Jay approved vendors.

4. Thermostats

Thermostats can contain as much as 3 grams of liquid mercury and may be in almost any building, including commercial, industrial, agricultural, community, and household buildings. Contact EHS, Ext. x4117, to arrange for proper disposal.

5. Compressed gas cylinder disposal

Compressed gases may be contained in large cylinders, lecture bottles, propane and butane fuel bottles, and aerosol cans. Most compressed gas cylinders used at John Jay College are leased from the vendor and are returned for reuse or disposal. Cylinder purchases are strongly discouraged because of the expense and difficulty associated with disposing of unused gases and cylinders.

Prior to ordering a compressed gas cylinder, a disposal or return plan should be agreed upon in writing with the vendor. This plan should spell out all procedures necessary for returning the cylinder to the vendor. If no arrangements were made prior to purchase, attempts to return unwanted cylinders to the distributor or the manufacturer must still be made by the college purchaser. If a vendor does not accept a gas cylinder for return, it may be necessary to treat the cylinder and contents as hazardous waste. EHS can accept and dispose of most empty gas cylinders and those containing atmospheric gases if vendor's arrangements cannot be made. However, this

process should be a last resort, and all attempts should be made to return empty gas cylinders to the vendor.

If a compressed gas cylinder is to be shipped, request appropriate instructions from the vendor. A valve cover must be present on the gas cylinder, and the correct US Department of Transportation (USDOT) description for the contents must be on the cylinder. Gas cylinder contents must be clearly identified with stamps, adhesive labels, or stencils. Applicable USDOT regulations must be adhered to before and after a cylinder is shipped. Additionally, the carrier may have its own requirements that must be followed.

A gas cylinder with unknown contents must be handled as a hazardous waste through EHS. Every attempt must be made by the user to identify the vendor and contents of an unknown cylinder. Purchase records and other documents should be searched to attempt to identify the cylinder's contents. Characterization and disposal costs for cylinders with unknown contents can be extremely expensive. Proper labeling and record keeping can prevent the cost and effort necessary to identify a tank containing unknown gases. For more information on handling of compressed gas cylinders, call EHS.

IV. Managing used oil

In most cases, used oil is not classified as a hazardous waste in New York State. However, depending on the materials that the oil may have been in contact with and how waste oil is disposed of, used oil may become a hazardous waste. For example, if oil was mixed with a listed hazardous waste (i.e. F-listed waste) it would be a hazardous waste.

Even though used oil generated at John Jay College is likely to be non-hazardous, a discussion of the management of used oil has been included in this document due to the unique nature of used oil disposal. EPA's used oil management standards are a set of "good housekeeping" requirements that encourage used oil handlers to recycle used oil instead of disposing of it. Used oil can be collected, refined and recycled, and used again—for the same job or a completely different task. Used oil is defined as "any oil that has been refined from crude oil or any synthetic oil that has been used and, as a result of such use, is contaminated by physical or chemical impurities." To meet EPA's definition of used oil, a substance must meet each of the following criteria:

- Origin: Used oil must have been refined from crude oil or made from synthetic materials. Animal and vegetable oils are excluded from EPA's definition of used oil.
- Used oils used as lubricants, hydraulic fluids, head transfer fluids, buoyants, and for other similar purposes are considered used oil. Unused oil, such as bottom clean-out waste from virgin fuel oil storage tanks or virgin fuel oil recovered from a spill, do not meet EPA's definition of used oil because these oils have never been used. EPA's definition also excludes products such as cleaning agents used solely for their solvent properties, as well as certain petroleum-derived products such as antifreeze and kerosene.
- To meet EPA's definition, used oil must become contaminated from being used. This includes residues and contaminants generated from handling, storing, and processing used oil. Physical contaminants can include dirt, metal scrapings, or sawdust. Chemical contaminants could include solvents, halogens, or saltwater.

V. Waste minimization

One goal of the *Hazardous Waste Management Program* is to reduce the amount of hazardous waste generated to the lowest practical quantity in order to conserve energy and natural resources through a program of effective waste minimization procedures (including recycling, reuse, product substitution, and treatment).

Purchasing procedures can minimize waste. Good purchasing decisions are the first steps in minimizing hazardous waste. Every effort must be made to keep purchased quantities to a minimum. Stockpiling products for future use or to take advantage of unit cost savings may not be appropriate since disposal costs of unused chemicals may exceed the initial savings from bulk purchases. The average cost to dispose of unused hazardous materials and other chemicals may be two to three times the original purchase cost. Purchase only the quantity of material that will be completely used within a reasonable time frame.

Other practices that help to minimize the potential for waste disposal include the following:

- Limit the amount of ordered materials to expected volumes of use
- Do not stockpile chemicals unnecessarily. Many chemicals, including organic compounds, degrade over time and lose their usefulness
- Check inventories to avoid ordering chemicals that are already in stock
- As a prudent practice, rotate chemical stocks to use up chemicals before their shelf lives expire
- Laboratories should investigate pre-weighed packaging options now available from chemical vendors. Particularly with highly toxic materials (e.g., carcinogens, teratogens, etc.), the purchase of pre-weighed materials avoids unnecessary handling, storage and disposal of excess toxic materials. Micro-scale packing is also available.

Source Reduction

Source reduction refers to practices that reduce, avoid, or eliminate hazardous waste at the point of generation. These practices may include:

- Use smaller quantities of chemicals in experiments or processes
- Where possible, substitute with less toxic or non-hazardous chemicals
- Plan activities/experiments to consume hazardous materials to the full extent possible and to minimize the amount and toxicity of waste materials produced
- Recycle or reuse, when possible, chemicals as opposed to disposing as hazardous waste. If you have no further need of a hazardous material, determine whether your colleagues can use it.
- Do not mix chemical wastes. Mixing reduces the likelihood that materials may be reused or redistributed and often increases disposal costs. If non-hazardous wastes are mixed with hazardous wastes, the combined volume is considered hazardous waste under state and federal regulations and must be handled and disposed of as hazardous waste at increased costs. If at all possible, do not combine other chemicals with organic solvents. Acids, bases, heavy metals, carcinogens, oxidizers, cyanides, sulfides, pesticides, non-halogenated solvents, and especially halogenated organic solvents (chloroform, methylene chloride, etc.) must be collected in separate, labeled, waste containers.

VI. Spill Control and Contingency Plan

In the event of a chemical or oil spill or leak, the person discovering the release must immediately initiate the following actions:

1. If it is safe to do so without endangering yourself or others, extinguish all sources of ignition and isolate incompatible or reactive chemical substances.
2. If there is an immediate threat to human health, evacuate the immediate area.
3. Attempt to stop or contain the spill/release at the source provided there are no health or safety hazards and there is a reasonable certainty of the origin of the leak.
4. Isolate all potential environmental receptors such as floor drains, catch basins, sumps, exposed soil, and runoff areas if it is safe to do so without endangering yourself or others.
5. During normal business hours, contact the Public Safety Emergency Line Ext. x8888 or (212) 237-8888 to reach EHS (Ext. x4117) and provide information regarding a spill event. At other times, such as non-business hours (i.e., evenings or weekends), contact Public Safety Ext. x8888 or (212) 237-8888 to provide information regarding a spill event. Regardless of who to contact, be prepared to provide the following information:
 - building and room number
 - material spilled and quantity
 - if radioactive or infectious agents are involved
 - other hazardous conditions that might exist in the area
 - time of the spill
 - damages or injuries caused by the spill
 - cause of spill
 - actions taken

EHS and/or the Director of Laboratory Operations will direct and coordinate the spill clean-up activities and evaluate if an environmental contractor will be required to perform the clean-up activities. EHS and/or the Director of Laboratory Operations will then initiate any notification procedures.

Refer to the John Jay College Emergency Response Guide (available at https://www.jjay.cuny.edu/sites/default/files/contentgroups/pub_safety/emergency_response_guide.pdf) for the procedures John Jay College faculty/staff and students should follow regarding various emergency incidents, including fires, fumes/vapors/gas leaks, and hazardous material incidents, and to the Evacuation Procedure (available at <https://www.jjay.cuny.edu/evacuation-procedure>) for the evacuation procedure to follow in the event of an emergency that may require evacuation.

VII. Standard operating procedures

Standard operating procedures (SOPs) are required for purchase, use, and storage of certain hazardous materials or instruments. Consult the *John Jay College Chemical Hygiene Plan* for more information.

VIII. Training

General

John Jay College personnel who generate hazardous waste are required to have training appropriate to their level of responsibility. This training will be provided initially at the time of employment, and on an annual basis. The training is arranged by EHS and will be given at least twice per year. Special training will also be provided by EHS upon request from personnel working in areas with unusual hazardous waste management requirements. Training for hazardous waste management on campus will be updated to reflect the most current regulatory requirements. Training materials include the following topics:

- Identification of hazardous waste
- Container use, marking, labeling, and on-site transportation
- Accumulation area requirements
- Storage area requirements
- Emergency procedures

For the Science Department, an annual hazardous waste refresher training online module may be used in lieu of classroom style refresher training. These trainings will test the trainees on their absorption of the material. Should a trainee fail the test at the end of the training, classroom style retraining must be arranged through EHS. Email Mircea Comanescu, Director of EHS, mcomanescu@jjay.cuny.edu, if you have any questions.

Special training

Anyone with oversight responsibility for packaging and transportation of hazardous materials is required by law to have training related to the preparation of hazardous materials for shipment. Individuals who supervise or prepare hazardous materials for transport and/or sign manifest documents must complete course work that meets USDOT and possible USEPA regulations. No John Jay College personnel may arrange for disposal, transport, shipment or sign hazardous waste manifest documents without completing the appropriate training, as required by applicable regulations.

IX. Recordkeeping

Recordkeeping requirements are as follows:

- EHS or the Director of Laboratory Operations will sign John Jay College hazardous waste manifests. Hazardous waste contracts are developed and managed by CUNY EHSRM or John Jay College EHS and include general hazardous waste, medical waste, and spill response.
- Records of all hazardous waste manifests will be kept on site for a minimum of three years from the treatment, storage, disposal facility (TSDF) returned copy date. Manifests beyond this date may be stored on site or stored in archives for a minimum of thirty years to serve as an accurate accounting of material shipped to potential CERCLA (Superfund) Sites.
- Written communication that the designated TSDF is authorized for the hazardous wastes being offered for shipment, has capacity to accept such hazardous waste, and will assure the ultimate disposal method is followed.

Environmental Health and Safety HAZARDOUS WASTE MANAGEMENT PLAN

- Land Disposal Restriction (LDR) notices, LDR determination records, Hazardous Waste Profile Sheets, and Exception Reports will be kept with the associated manifests. These documents are to be kept with the manifest for the time period indicated herein.
- Waste analyses and laboratory analytical reports will be kept with the hazardous waste manifests for the established time period (three years on site, thirty years archived). Note that laboratory analytical reports may be kept with hazardous waste profiles, in contract files, permitting files, or in individually designated files depending on the nature of the contract and/or waste materials.
- Personnel training records on current personnel will kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.
- Notification and documentation to prove secondary material is not “Solid Waste” will be maintained until closure.

Note: The periods of retention referred to in this procedure are automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the USEPA Administrator (per 40 CFR Part 262.40(d)).

X. Information and contacts

Information

City University of New York; Environmental Management System

John Jay College Emergency Response Guide

John Jay College Evacuation Procedure

USEPA, Hazardous Waste Regulations; 40 CFR Part 260 et seq.

NYSDEC Hazardous Waste Regulations; 6 NYCRR Part 370 et seq.

Contacts – John Jay College

Mircea Comanescu, Director of Environmental Health & Safety: (212) 621-4117

Natalya Timmer, Director of Laboratory Operations: (212) 237-8893

Francis Sheehan, Chemical Hygiene Officer: (212) 237-8951

Laboratory Technician: (212) 237-8895

Appendix A. Hazardous Waste Labels

John Jay College's Hazardous Waste Label can be found:

http://www.jjay.cuny.edu/hazwaste_labels.pdf

<p>HAZARDOUS WASTE</p> <p>Federal Laws Prohibit Improper Disposal Container must be securely capped at all times</p> <p><u>Generator Information</u> John Jay College of Criminal Justice 524 W. 59th Street NY, NY 10019</p> <p>Name of PI / Instructor _____</p> <p>Labeled By _____</p> <p>Room Number _____ Lab Phone Number _____</p> <p>Only the following chemicals may be placed in this container:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p><input type="checkbox"/> Corrosive <input type="checkbox"/> Ignitable <input type="checkbox"/> Reactive <input type="checkbox"/> Toxic Full Container (Accumulation) Date: _____ Environmental Health & Safety (212-621-4117) safety@jjay.cuny.edu</p>
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<p>HAZARDOUS WASTE</p> <p>Federal Laws Prohibit Improper Disposal Container must be securely capped at all times</p> <p><u>Generator Information</u> John Jay College of Criminal Justice 524 W. 59th Street NY, NY 10019</p> <p>Name of PI / Instructor _____</p> <p>Labeled By _____</p> <p>Room Number _____ Lab Phone Number _____</p> <p>Only the following chemicals may be placed in this container:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p><input type="checkbox"/> Corrosive <input type="checkbox"/> Ignitable <input type="checkbox"/> Reactive <input type="checkbox"/> Toxic Full Container (Accumulation) Date: _____ Environmental Health & Safety (212-621-4117) safety@jjay.cuny.edu</p>
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Appendix B. Hazardous Waste Satellite Accumulation Area Sign

HAZARDOUS WASTE
Satellite
Accumulation
Area

Federal law prohibits improper disposal.

This location is considered a hazardous waste satellite accumulation area under U.S. Environmental Protection Administration regulations. See

JOHN JAY COLLEGE
HAZARDOUS WASTE MANAGEMENT PLAN

- Waste chemicals should be packaged in securely capped bottles or containers, which are chemically compatible with the contents. Waste containers must be placed in a secondary container (basin or bucket) and must remain securely capped at all times, except while having chemicals added. All old labels are to be removed and replaced with a “Hazardous Waste” label, which is available from the Environmental Health & Safety Officer. Containers must be labeled before placing chemicals in them. The label must indicate full chemical names of principal components. Abbreviations or chemical formulas are not acceptable.
- Chemical and chemicals waste spills must be reported to the Environmental Health & Safety Officer (Ext. 4117). In an emergency call the office of Public Safety at extension 8888 and give them the following information your name, phone number and location. Material, amount, and location if the spill.
- Call Ext. 8893 for waste pick-up when any container is 80% full.

Appendix C. Satellite Accumulation Area Inspection Log Sheet

Inspection Date										
Satellite Accumulation Area has a sign	Y	N	Y	N	Y	N	Y	N	Y	N
Fire extinguisher is charged	Y	N	Y	N	Y	N	Y	N	Y	N
Adequate spill materials are present	Y	N	Y	N	Y	N	Y	N	Y	N
All containers are labeled accurately	Y	N	Y	N	Y	N	Y	N	Y	N
All labels are visible and not damaged or deteriorating	Y	N	Y	N	Y	N	Y	N	Y	N
Incompatible materials are stored separately	Y	N	Y	N	Y	N	Y	N	Y	N
Containers have an appropriate lid/cap (not funnel) on except when being filled	Y	N	Y	N	Y	N	Y	N	Y	N
Containers are in good condition	Y	N	Y	N	Y	N	Y	N	Y	N
Containers are not leaking	Y	N	Y	N	Y	N	Y	N	Y	N
Wastes containers placed in segregated secondary containers	Y	N	Y	N	Y	N	Y	N	Y	N
There is adequate walking space	Y	N	Y	N	Y	N	Y	N	Y	N
No full containers that have been accumulated for more than 3 days and not moved to MAA	Y	N	Y	N	Y	N	Y	N	Y	N
Inspector's Initials										
Comments										

Appendix D. Main Accumulation Area Inspection Log Sheet

Date											
Fire extinguisher is charged											
Adequate spill materials are present											
Containers are in good condition											
Containers are not leaking											
Incompatible materials are stored separately											
All containers are labeled accurately											
All labels are visible and not damaged or deteriorating											
There is adequate walking space											
Inspector's Initials											
Comments											