

Policy Title: Hazardous Chemical Management			
Policy #:	FA-CPS-005		
Responsible Office:	Campus Public Safety		
Responsible Administrator:	Vice President for Finance and Administration		
Date Reviewed:	August 2014	Revisions Made? Yes ____ No <u>X</u>	
Date of Next Review:	August 2017		

PURPOSE

The purpose of the policy is to ensure all departments and campus purchasing agents at Western Oregon University comply and/or are proactively moving towards compliance of campus hazardous waste materials. In addition, the policy is necessary to maintain low generation of waste so the WOU preserves the status of a "**Conditionally Exempt Generator**" and reduce danger, financial impact and hazardous waste disposal from campus.

AUDIENCE

WOU Employees

DEFINITIONS

Acute: Exposures and effects involve high concentrations for short periods of time that result in immediate response such as illness or death.

Compressed Gases: May be flammable, corrosive or toxic and are found in laboratories and the Physical Plant.

Conditionally Exempt Small Quantity Generator: Western Oregon University is considered by the DEQ to be a "**Conditionally Exempt Small Quantity Generator**" This is based on historical data, forwarded to DEQ annually, that indicates WOU generates the following:

- 2.2 pounds or less of acute hazardous waste; or
- 220 pounds or less of hazardous waste; or
- 220 pounds or less of spill cleanup debris containing hazardous waste; or,
- At any time, a cumulative level of up to 2,200 pounds of hazardous waste on site.

For Western Oregon University to remain a conditionally exempt small quantity generator we must remain within these guidelines.

Corrosives: Acids or bases in solid or liquid form.

Hazardous Chemical: Any chemical or mixture of chemicals which can harm your body at exposure or

later. These chemicals may be liquids, gases, vapors, fumes or solids and may be a physical or health hazard.

Organic Solvents: Used to dissolve oils, greases and resins and are common in paints, lacquers, adhesives, pesticides, plastics, rubber, waxes, etc.

POLICY STATEMENT

It is the policy of Western Oregon University to comply with ORS 465.003-037 to reduce and manage all toxic substances and hazardous waste on the University campus from the point of purchase to legal disposal. Hazardous chemical management shall consist of purchasing, handling, storage, disposal, reduction and recycling.

WESTERN OREGON UNIVERSITY IS RESPONSIBLE FOR ALL HAZARDOUS CHEMICALS AND WASTE ON CAMPUS FROM DATE OF PURCHASE UNTIL THE CHEMICAL NO LONGER EXISTS.

Hazardous Chemical Management Priorities:

1. Reduce the quantity of hazardous waste generated by WOU at time of purchase and during the period of usage.
2. Manage generated hazardous waste in a manner which protects the safety and health of students, faculty, staff and the public.
3. Manage hazardous waste in an environmentally sound and responsible method.
4. Maintain compliance to all Federal and State regulations for hazardous waste management.

Toxic Chemical Generators:

The following departments are known to purchase, store and generate toxic chemicals or waste:

* Physical Plant	* Student Health	*Athletic Department
* Theatre Department	* Auxiliaries	*Natural Science Building
* DeVolder Science Building	*Campus Public Safety	*Art Department
* Physical Education		

PROCEDURES

1. Responsibility

- a. **Faculty, Supervisors, and Departments** are responsible for management of all hazardous chemicals and waste **in their work site area**, to include:

- Documented training for employees on chemical use, hazards and applications, labeling and securing (Hazard Communication “Right to Know” law);
- Written procedures are in place for the handling and disposal of chemicals in their department/work area;

- Written procedures are in place on how to store and dispose of hazardous chemicals and hazardous waste in their areas;
- Identifying alternatives to hazardous chemicals (particularly prior to purchase);
- Make immediate availability of Safety Data Sheets (SDS) to all employees exposed to chemicals in their area;
- Date all purchasing, receiving and date of disposal of all hazardous chemicals in their unit;
- Reviewing toxic use and waste reduction advantages;
- Assign person(s) responsible for hazardous chemicals in their department/area.

b. **Purchasing Department:** Responsible for the inventory of all hazardous chemicals and purchasing, to include:

- Identifying and purchasing alternative chemicals vs. hazardous chemicals;
- Obtaining SDS on hazardous chemicals if one is not enclosed in shipments;
- Providing a written inventory of all hazardous chemicals purchased or in stock at all times.

c. **Campus Public Safety, Occupational / Environmental Safety:** Responsible for the management of OR-OSHA and DEQ laws relating to hazardous chemicals on Western Oregon University's campus, including:

- Develop written campus plan to comply with ORS 465 and OAR 340;
- Quarterly and annual reports to DEQ;
- Coordinate off campus disposal with vendors;
- Hazardous waste and chemical cleanup coordination and reporting to DEQ;
- Department consultation for reducing, recycling and storage techniques.
- The University Master Plan required by statute;
- Consultation, monitoring and regular inspections of those departments handling chemicals and hazardous waste to ensure university compliance;
- Maintenance of records for compliance to OR-OSHA and OAR requirements.

d. **Employees:** Responsibilities include:

- Participate in annual department training related to hazardous waste;
- Following written safety procedures on chemical use and storage;
- Perform work around potential hazardous chemicals in a safe manner.

2. **Purchasing Responsibility:** Centralized purchasing of all chemicals with the campus goal to eliminate hazardous waste prior to entering the University's inventory. To reduce and eliminate hazardous chemical exposure, the following guidelines are in place for departments and the centralized purchasing department:

- Over purchasing** - Avoid over purchasing of hazardous chemicals.
- Review SDS** - Review SDS for hazardous components prior to purchase.
- New Equipment** - Consider toxic use and waste reduction advantages when purchasing new equipment.
- Safety Data Sheets (SDS)** - All hazardous chemicals are to have SDS on file when purchased and

inventoried at the site where the chemical is used. A copy of all SDS is to be sent to Campus Public Safety to have on file.

- e. **Replacing Chemicals** - Chemicals that are hazardous should be reviewed by the purchasing agent for alternative or less hazardous chemicals.
 - f. **Expired Chemicals** - Chemicals out of date or have an expired shelf life should not be allowed into inventory.
 - g. **Only As Needed** - Reduce or eliminate hazardous chemicals by purchasing supplies only when and as needed. Projected savings from purchasing chemicals in larger quantities is often offset by costs for disposal of unused portions, especially those with a limited shelf life.
3. **Labeling and Storage** - A designated “responsible person(s)” in each department is to be in charge of purchasing, labeling and storage of department chemicals.
- a. **Labeling** - All chemicals are required to be labeled with the chemical name, the major hazards and personal protective equipment required to handle the chemical (e.g. gloves, eye protection, etc.).
 - b. **Unmarked (unknown) Containers** - At no time is a chemical container to be unmarked. If a container is found to contain an unknown material, the material will be sampled and a professional, analytical test will be conducted. The test will consist of a hazardous waste profile and solvent scan. The approximate \$650.00 cost of the testing will be the responsibility of the department where the container was located.
 - c. **Secondary Containers** - If a secondary container is used to store a chemical, it is required to be labeled in the same manner as the original container (see Hazard Communication Policy).
 - d. **Segregate** - Hazardous chemicals should be stored based on their hazard classification. Examples include: separate oxidizers from flammables; acids from bases; flammables from corrosives. Separate hazardous chemicals from non-hazardous chemicals.
 - e. **Storage** - Should include the following:
 - Sturdy shelving with containment trays and secured from movement (bumping, earthquake, etc.);
 - Well ventilated;
 - Stored away from heat and light;
4. **Reduction** - When applicable, departments and purchasing should consider the reduction of hazardous chemicals in the work place. If smaller quantities of the chemical can be used with the same effectiveness or results, it should be considered.
5. **Recovery, Recycled** - All chemicals capable of being recycled should be considered based on cost and impact to the environment. Recycling hazardous chemicals has the capability of saving thousands of dollars per year on waste disposal. Chemicals that currently or potentially may be recycled include oil, solvents, anti-freeze, thinners, etc. At no time should a hazardous chemical be given to a recycling vendor who may be violating federal and state environmental laws. Departments found to be out of compliance will be responsible for all fines and violations.
6. **Alternative Chemicals** - When applicable, departments should consider replacing hazardous chemicals with non-hazardous or a less hazardous chemical.

7. **Process Modification** - Departments should consider changing a procedure to reduce the amount of chemicals used. An example would be using less of a chemical with the same desired results or eliminating completely.
8. **Documentation** - Departments and the purchasing division who buy or maintain hazardous chemicals are to maintain documented inventory control from the date of purchase to the date the hazardous chemical was used or destroyed, including:
- Date of purchase;
 - Date the hazardous chemical was placed into inventory;
 - Date the hazardous chemical was used in a process;
 - Date the hazardous chemical was released for disposal.
9. **Assigned Person(s)** - This policy is intended to manage hazardous chemicals and maintain Western Oregon University as a "Conditionally Exempt Generator." For WOU to be in compliance with Oregon Revised Statutes, departments who handle, use or generate hazardous chemicals or waste should have an assigned person(s) to manage their department's hazardous chemicals.
10. **Accountability** - Departments are responsible for the hazardous chemicals they purchase or control. When WOU is inspected by OR-OSHA or DEQ, the departments who may not be in compliance with this policy will be responsible for potential citations and fines.
11. **Hazardous Waste/Chemical Disposal** - Departments who have hazardous waste or chemicals requiring disposal are to contact EHS / Campus Public Safety (8-8481) for pickup. **Full containers of hazardous chemicals or waste should not be kept by the department for more than 30 days.** The following procedures should be followed for the disposal of hazardous chemicals:
- Hazardous chemical tracking form is initiated
 - The hazardous chemicals will then be picked up and stored in Western's Hazardous Materials building.
 - When enough hazardous chemicals have been collected, arrangements will be made with the Hazard Waste Vendor to dispose of the chemicals.
- At no time is anyone (employees, faculty, students, etc.) allowed to dispose of hazardous chemicals inconsistent with the manufacturer's recommended methods, such as pouring hazardous chemicals down a drain or discarding hazardous chemicals in trash containers, etc.
12. **Disposal Costs** – Each department is responsible for their own chemical waste disposal costs.

FORMS

REQUEST FOR HAZARDOUS WASTE DISPOSAL

To initiate disposal, please complete the following and forward to Campus Public Safety.

Date of Request_____ Date of Pickup_____ Date of Disposal_____

Department_____ Building_____ Room #_____

Waste Disposal Contact Person_____ Telephone _____

Account # to Charge_____ Contact _____ Phone_____

WASTE DISPOSAL

SOLIDS

Container Size

Five (5) pounds or more

Three (3) pounds

One (1) pound

Less than one pound

Other_____

Number of Containers

Total _____

LIQUID

Container Size

Five (5) gallons or more

Three (3) gallons or more

One (1) gallon or less

Other_____

Number of Containers

Total _____

Released by

Released to

(Department Representative) Date

(Occupational/Environmental Safety) Date

Released by

Released to

(Occupational/Environmental Safety) Date

(Waste Disposal Vendor) Date

AUTHORITY

Name & URL of authority:

Oregon Revised Statutes 465.003-037(<http://www.oregonlaws.org/ors/465.003>)

OAR 340 (http://arcweb.sos.state.or.us/pages/rules/oars_300/oar_340/340_tofc.html)

OR-OSHA Laws (<https://www.osha.gov/law-regs.html>)

Oregon DEQ Laws (<http://www.deq.state.or.us/regulations/rulesandlaws.htm>)

RESPONSIBILITY

Campus Public Safety is responsible for this policy and may be contacted at 503-838-8481 or safety@wou.edu.

Alternate formats of this policy may be requested from the Office of Human Resources.