

## **EPA makes Hazardous Waste Management a Little Easier at Colleges and Universities**

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The United States Environmental Protection Agency has issued a final ruling that addresses the nature of hazardous waste generation at colleges and universities, as well as nonprofit laboratories and teaching hospitals affiliated with those educational institutions.

Affected institutions are now allowed to decide at what location they determine whether their solid waste is hazardous, and where they assign the proper hazardous waste code (be it at the laboratory or at an on-site central accumulation area). This ruling requires academic institutions and teaching hospitals to make certain determinations about waste generations, which they have had some difficulty doing in the past. It has been revealed that often the students are the generators of the waste, and are not trained in identifying and properly coding it.

Under the new rule, trained environmental health and safety officials must make the

determinations. If the waste remains in the laboratory before a determination is made, it will be called “unwanted material.”

The rule requires that the unwanted materials be removed from the laboratory, primarily based on the amount of time it has been there and secondarily based on volume. These unwanted materials must be removed from the laboratory on a regular basis that does not exceed six month intervals. However, if the lab accumulates 55 gallons of unwanted material, or more than one quart of reactive acutely hazardous unwanted material, then the material must be removed within 10 days.

The rule also includes incentives for discarding unneeded or expired chemicals. Under the new rule, once every 12 months each laboratory will have 30 days to conduct a cleanout and will not have to count the unused commercial chemical products toward their hazardous waste total.

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