

Hazardous Waste Management and Security Plan

PURPOSE

The purpose of this policy is to ensure that all hazardous waste is properly managed and disposed of in accordance with all applicable federal, state and local regulations. The university makes every effort to minimize the generation of hazardous waste. This policy also serves as Loyola University Chicago's Hazardous Materials Security Plan as mandated by the U.S. Department of Transportation.

POLICY

Loyola University is committed to providing its employees with a safe and secure work environment. All university employees are encouraged to diligently assist in implementing this plan and to continuously improve Loyola University's waste management and security efforts.

1.0 Definitions

1.1 "Hazardous Waste" is defined under federal law as a chemical waste that is specifically listed by the EPA as a hazardous waste or if it exhibits one or more of the following characteristics: ignitability, corrosiveness, reactivity, and/or toxicity.

1.2 This hazardous waste policy does not include radioactive waste, biological waste or hazardous chemicals that are unused.

1.3 "Satellite Accumulation Areas" are areas designated for hazardous waste collection and temporary storage near the point of generation. Hazardous waste in these areas can not exceed 55 gallons. When the total amount of waste reaches the limit the waste must be moved to a Central Waste Accumulation Area.

2.0 Roles and Responsibilities

2.1 Department Faculty and Staff Employees:

Each Principal Investigator, Laboratory Supervisor or other departmental employee with assigned duties related to the storage or management of hazardous waste is responsible for the proper management of hazardous waste in their laboratory or work area, to include labeling of containers, segregation of waste, inspections and maintenance of the area.

2.2 Safety Manager:

The Safety Manager is responsible for coordinating the pickup of hazardous waste, to ensure compliance with state and federal regulations and to maintain records related to the pickup, transportation and disposal of all hazardous waste.

2.3 Human Resources:

Loyola University Chicago is dedicated to employing the most qualified personnel to serve its students. Although the USDOT requirements for performing employee background checks pertain only to those employees who have or will have access to hazardous materials, Loyola University believes it is essential to screen all potential new hires. During the hiring process, Loyola University conducts a personal interview with all qualified applicants. In addition, each applicant is required to complete a job application form. All information obtained from the employment application are confirmed and found to be satisfactory before any applicant is offered employment. Additional background investigations are conducted for sensitive positions such as Campus Safety Officers which require fingerprinting and criminal history checks.

2.4 University Employees:

Employees are responsible for participating in lab safety training, security awareness training, first responder and other training appropriate to the employee's job duties. Training may be provided by the individual departments, the safety office or the university's on-line training programs.

2.5 Employee Identification:

University employees responsible for waste management functions and or facility security functions must have proper proof of personal identification as a university employee available for inspection at all times. Employee identification badges must be returned upon termination of employment.

3.0 Procedures

3.1 Satellite Accumulation Areas:

Satellite Accumulation Areas (SAA) must be managed in accordance with all applicable U.S. EPA and Illinois EPA regulations regarding the collection and storage of hazardous waste. Waste chemicals must be stored in secondary containment bins to collect spills and prevent mixing of incompatible chemicals. Waste chemicals can not exceed the 55 gallon limit for Satellite Accumulation Areas.

3.2 Central Accumulation Area:

Hazardous waste that is collected from the Satellite Accumulation Areas within the building must be moved to a central location where the waste can be stored, consolidated and packaged for disposal. This area must be a secured space with restricted access to only authorized personnel. The area must have proper signage on the door indicating the hazards present and spill kits available to facilitate a timely response and cleanup of a minor spill. An outside contractor is available to respond to more serious spills under a twenty-four hour a day emergency response service.

3.3 Emergency Response Plan:

The university's Emergency Response Plan was established to provide guidance in responding to serious incidents, including chemical spills. The plan is designed to minimize hazards to human health, the environment and property. The plan contains detailed emergency information and is updated on a regular basis not to exceed one year. Small desk top emergency procedures handbooks are issued to all employees allowing for quick reference for steps to take in an emergency situation.

3.4 Training:

Employees who work with hazardous materials are required to attend yearly training regarding the proper handling of hazardous waste. Employees who may be required to respond to a chemical incident must complete emergency first responder awareness level training. In addition, the USDOT requires security awareness training for all employees associated with hazardous materials duties. The security awareness training must include a component on how to recognize and respond to possible security threats. Training will also include employees' responsibilities for securing hazardous materials and the actions to be taken in the event of a security breach.

3.5 Waste Minimization Plan:

The university employs methods and procedures to reduce the volume of hazardous waste generated on campus.

3.6 Package Control Measures:

Loyola University Chicago personnel are responsible for tracking shipments received and verifying the package count is consistent with the number of packages documented on the shipping papers or manifest. Any discrepancies that can not be reconciled should be reported to the appropriate manager. Likewise the department representative should verify the number of containers listed on the manifest for transportation of hazardous materials by the outside contractor. Only authorized personnel should have access to chemical store rooms and hazardous waste storage areas.

3.7 Safety Inspections and Self-Assessment:

Labs and storage room must have monthly safety inspections. Security should also be reviewed as part of the inspection. Employees must take corrective action when a safety or security concern is observed. Any suspicious activity or thefts of chemicals must be reported to the responsible Chair or Director.

3.8 Facility Specific Security Planning:

A security plan will be developed for individual building and areas within the buildings based on a threat assessment. Areas of concern to be addressed include physical security systems, access control, emergency contact information, and visitor procedures. Security plans may be incorporated into the university's emergency response plan or as a separate addendum to the site's contingency plan.

REFERENCES

U.S. Department of Labor OSHA Standards for General Industry:

OSHA has established the following standards for Hazardous Waste Management.

29 CFR 1910.120 (a) through (q)

U.S. EPA has established the following standards for Hazardous Waste Management

40 CFR 262.10 through 40 CFR 262.108 and 40 CFR Subpart B

U.S. DOT has established the following standards for Security of Hazardous Waste Generators

49 CFR Subpart I