Arkansas State University Laboratory Management Plan

Effective December 1, 2015, EPA ID # ARR000000794 shall manage hazardous waste in accordance with 40CFR262 Subpart K; this plan becomes effective therewith.

Part I

1- Container Labeling. Only containers with the appropriate label may have waste placed into them. The chemical waste label template is available on the EHS website. Each label shall bear the words "CHEMICAL WASTE", a description of the waste and the date waste was first added to the container.

2- Waste Removal. Waste shall be removed upon request or within 6 months of the date placed on the label, whichever comes first. § 262.208 (a)(2)

Part II

1. **Container Management.** Working containers (open containers 2 gallons or smaller) may be open during the work day for chemical waste collection, but must be emptied and cleaned at days end into an appropriately labeled container. A container used for in-line collection (connected by tube to, for example, an HPLC) may be vented. Funnels that attach to the container and have a closable lid are considered closed when the lid is closed. All waste containers, other than working containers or vented containers used for in line collection, must remain closed unless waste is being added to them.

2. Generator Training. Training sufficient to permit implementation of this plan for waste generators, people working in the labs, shall be provided by the EHS director in person or online.

3. **Handler Training.** Waste may only be removed from, or handled outside, the generating lab by a "trained professional". Currently, this includes on the EHS Director. These trained professionals shall be current per § 262.34(d)(5)(iii): "*The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.*"

4. **Waste Removal Schedule.** An individual container will be removed within six months of its accumulation start date or when full. Each container end date will be documented in an electronic calendar that will notify the EHS trained professional of the approaching time limit. At the moment that hazardous waste exceeds 55 gal or that acutely hazardous waste exceeds 1 quart in a particular laboratory, the researchers of that laboratory must immediately notify a trained EHS professional so that the event can be documented (including date that excess occurred), and all waste removed within 10 calendar days. EHS personnel should regularly check labs for containers that are approaching fullness or are nearing the date for removal.

5. Hazardous Waste Determinations. Upon removal, containers will be brought directly to the central accumulation area by the trained professional where the words "Hazardous Waste", the hazard characteristics, and codes will be applied within 4 calendar days.

6. Laboratory Clean-outs. Each laboratory in the facility may use the clean-out option to remove all unwanted-unused or off-spec commercial chemicals, without having the quantity count against generator status, annually using 30 calendar days. The start and end dates of a lab Clean-Out including waste volume collected and lab identification will be documented and retained indefinitely.

7. **Emergency Prevention.** Contact information will be posted next to each telephone in each lab. A facility alarm system monitored by a trained professional will be tested annually.