



The College at  
**BROCKPORT**  
STATE UNIVERSITY OF NEW YORK

# **Hazardous Waste Emergency Response Plan**

**ENVIRONMENTAL HEALTH AND SAFETY OFFICE  
Commissary Building**

Revision Date: July 2019



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## Emergency Coordinators and Telephone Numbers

Emergency Coordinators Office Numbers	Home Address and Telephone
<b>Julie Caswell</b> <b>EHS Department</b> Primary Emergency Coordinator	Telephone (Office) 585-395-2495 Cell 585-233-0372
<b>Elizabeth Gregory</b> <b>EHS Department</b> Alternate Emergency Coordinator	Telephone (Office) 585-395-2005 Cell 585-690-4676

**\*The listed alternate emergency coordinator shall serve in the order listed if the primary emergency coordinator is unavailable.**

## Additional Emergency Telephone Numbers

Organization	Emergency Phone #	Contact	Phone Number
Brockport Fire Department	911		585-637-1030
University Police	585-395-2222	Chief Daniel Vasile	585-395-2226
Brockport Police	911		585-637-1020
Brockport Ambulance	911		585-637-1035
Strong West ER	585-758-1010		585-276-7200
NYS Department of Environmental Conservation (NYSDEC)	N/A	Avon Regional Office	585-226-2466
NYSDEC	N/A	Spill Hotline	1-800-457-7362

## **Introduction**

This Hazardous Waste Emergency Response (Plan) is designed to minimize hazards to human health and the environment from adverse situations caused by a sudden or non-sudden release of hazardous waste to the environment. The Plan describes the procedures that will be carried out whenever there is a fire and/or an explosion in a hazardous waste storage area. This Plan is written in reference to chemical waste(s) stored in hazardous waste storage areas, not satellite accumulation areas. The Plan also describes procedures that will be conducted in the event of a release of hazardous waste in a hazardous waste storage area. The Plan should be carried out immediately whenever such a threat exists.

## **Contents of the Plan**

State University of New York College at Brockport (SUNY Brockport) employees who have responsibility for implementing this Plan or a portion of this Plan must review this Plan and be familiar with its contents. Each response to an emergency will be unique. However, appropriate action(s) must be understood prior to an incident, must be taken quickly and should be consistent with this Plan. The contents of this Plan are briefly described below.

- Section I. Hazardous Waste/Materials Emergencies that details the contingency plan procedures and personnel responsibilities
- Section II. Hazardous Waste Handling identifies hazardous waste management practices, training requirements and waste classification information
- Section III. Other Waste Materials describes universal and electronic waste materials

## **Section I - Hazardous Waste/Material Emergencies**

**The Director of Environmental Health and Safety (EHS) at SUNY Brockport has primary responsibility for Chemical and Hazardous Waste Emergencies and is considered the emergency coordinator for the purposes of compliance with 6 NYCRR Part 373-3.**

**University Police has the primary responsibility for responding to all emergencies and will initiate the Campus Incident Management System as required in the written plan.**

Because of the varied operations at SUNY Brockport, a hazardous materials emergency could occur at any time and in almost any place on campus. The college handles and stores a wide range of hazardous materials and it is imperative to remember this fact when responding to an incident. The spill response kits and personal protective equipment (PPE) available to SUNY Brockport staff are for small spills of routinely handled materials and are not adequate to handle a large spill or a fire involving chemicals; in these other situations outside assistance shall be requested. Only personnel trained specifically in fire and/or chemical response can be expected to actively respond to chemical spill/release or a fire involving chemicals.

**Only the Brockport Fire Department can request an emergency response from the Monroe County Hazardous Materials (Hazmat) Team.**

Not all chemical incidents/accidents will be handled in the sequence listed in this Plan but personnel should strive to follow the notification procedure outlined as closely as possible.

Chemical spills that require an emergency response are larger than 2.5 liters (0.7 gallons), any size spill of acutely hazardous (P-listed waste or any size spill of an unknown chemical). Incidental spills are defined as a spill of a material/chemical that is routinely handled by the individual employee or faculty member, the identity of which is known and the quantity of which is less than 2.5 liters (0.7 gallons). An incidental spill may be cleaned

up by an employee, using the proper clean up materials or spill kits that are available in labs and other locations on campus. There is no need for further training or reporting for an incidental spill. If, for any reason, there is a question whether a spill is incidental or reportable, please err on the side of safety and report the spill to EHS.

**Report all chemical spills to EHS (X2495 or X2005) that are larger than 2.5 liters (or 0.7 gallons) or any size spill that is an acutely hazardous or unknown chemical.**

The **Director of Environmental Health and Safety** at SUNY Brockport has the primary responsibility for responding to chemical or hazardous waste emergencies.

## **A. Contingency Plan Procedures – NYSDEC regulatory requirements (fire, explosions and hazardous waste releases)**

**1. Evacuation Procedures – Evacuation routes are spelled out in the SUNY Brockport Evacuation Procedures Policy, as follows:**

**POLICY: All fire alarms, emergency voice notification system messages, etc. are to be taken seriously, especially in this time of heightened security awareness and the potential need to evacuate a building for other reasons such as an emergency response to a spill or other event.** Evacuation of the facility is mandatory until the signal to re-enter has been given by the **Brockport Fire Department, University Police, or Environmental Health and Safety personnel.**

**PROCEDURE:**

- Stairwells in the building will be used for the evacuation of the building – proceed to the **nearest exit sign**, which MAY NOT be the way you entered the building.
- ***The elevators will not be used as they are programmed to shut down during a fire alarm.***
- When the alarm is sounded, all occupants will use the **nearest exit**. If that stairway is not usable, go to the next closest stairway.
- Doors, and if possible, windows, should be closed as the last person leaves a room or area.

- When the alarms sound, evacuate the building quickly, but do not run. Do not panic.
- Persons who walk slowly or have difficulties with stairs should walk to the right.
- Leave the vicinity of the building so that **emergency personnel** will have access to the building.
- Proceed to your muster point/designated assembly area for your floor. The designated area should be relayed to your group by the faculty instructor, staff member, building coordinator or otherwise indicated in the fire evacuation plan/signage. A head count needs to be taken at the designated area to ensure all occupants have left the building.
- Never re-enter a building without the all clear from the **Fire Department , University Police, or Environmental Health and Safety personnel.**

**RESPONSIBILITIES: \* Be advised – it is a requirement of the New York State Office of Fire Protection and Control and New York State Law that all occupants evacuate the building once a fire alarm is activated, whether it is a drill or not. Failure to evacuate will result in appropriate disciplinary action.\***

FACULTY- All faculty members should immediately evacuate students from classroom upon activation of the fire alarm. It is imperative that ALL faculty follow this procedure to ensure a complete evacuation of the building.

STUDENTS- All students are required to evacuate the building immediately and stand approximately 200 feet from the building at a designated assembly area.

EMPLOYEES- All employees are required to evacuate the building immediately and stand approximately 200 feet from the building at a designated assembly area.

### **DESIGNATED ASSEMBLY AREAS/ MUSTER POINTS**

Department heads, supervisors, faculty and/or building coordinators should designate a muster point outside the building approximately 200 feet away from the building for people to go to after evacuation. Once outside, those who are away from their respective group, at time of evacuation, should make their way to the muster point if safe to do so. It is important to know that everyone is out of the building and to ensure that everyone is accounted for.

**We are all responsible to provide for a safe learning and working environment – please take a few minutes with your floor, your department, or your class to designate a muster point for your particular group. Communicating this information prior to an incident is critical to the safety of our campus community.**



## EVACUATION OF INDIVIDUALS WITH DISABILITIES – PRE-PLANNING

- Any individual with a disability should contact either the Office of Students with Disabilities, Human Resources, University Police or the EHS Office to pre-plan how you will evacuate during an emergency, based on location and needs.
- Students with disabilities should fill out self-disclosure form from the Office of Students with Disabilities. The Coordinator of the Office of Students with Disabilities will meet with students needing assistance to discuss a plan of action. The Assistant Director of Human Resources/Affirmative Action Officer will meet with faculty and staff needing assistance to discuss a plan of action. The College cannot guarantee that aid will be available during an evacuation, so the individual must be prepared to evacuate as best they can unassisted.
- Arrangements should be made, ahead of time, to alert building coordinators, departments, faculty and/or staff so that the responding fire department is aware of the location of disabled persons. The fire department will evacuate persons with disabilities in a fire emergency situation.

## EVACUATION OF INDIVIDUALS WITH DISABILITIES – “AREA OF REFUGE”

- All persons (including those who are disabled) should proceed toward the nearest safe emergency exit and exit the building - with the help of others, if necessary. Those with physical disabilities, which make exiting by stairs impossible (ex. Wheelchair), should exit into the stairwell landing. Stairwell landings in all buildings are considered the “AREA of REFUGE”, as these areas have additional fire protection due to building codes and emergency responders are trained to check all stairwells first as part of their rescue procedures.
- If PREVIOUS ARRANGEMENTS HAVE NOT BEEN MADE a disabled person should request help from others in the area in order to exit the building. If this is not successful proceed to an “AREA of REFUGE” which should be a fire exit stairwell or an otherwise designated location. It is best to know, ahead of time, where an “AREA of REFUGE” is located. It is strongly recommended to have some form of communication to the outside world from an “AREA of REFUGE” – cell phone, emergency phone, etc. or let someone else know so this information can be provided to emergency responders. Close all fire doors behind you.
- If you have a phone available, call 395-2222 or X2222 (on campus phone) and give your name and location OR let someone know where you will be, beforehand, so they can relay the information to emergency responders. Do not call 911 from your cell phone, as it may delay response by campus police.
- Students with disabilities should fill out self-disclosure form from the Office of Students with Disabilities. The Coordinator of the Office of Students with Disabilities will meet with students needing assistance to discuss a plan of action.

The Assistant Director of Human Resources/Affirmative Action Officer will meet with faculty and staff needing assistance to discuss a plan of action.

- **If a disabled person is visiting a department, it is that department's responsibility to assign sufficient employees or students to assist in evacuation when necessary and to alert University Police, EHS, and/or Emergency Responders. The Brockport Fire Department takes control of the building in any fire situation – they need to be alerted to any instance where assistance is required to evacuate the building.**

## **2. Response Procedure – Notifications and Safety**

- Contact EHS personnel at X2495 (Julie Caswell) or X2005 (Elizabeth Gregory) during normal working hours. After hours, contact University Police at once at 395-2222 or at x-2222 on campus, in an emergency. The Primary Emergency Response Coordinator is Julie Caswell. She can be reached after hours at cell phone number (585) 233-0372. The Alternate Emergency Response Coordinator is Elizabeth Gregory. She can be reached after hours at cell phone number (585) 690-4676.
- Approach incident from an upwind direction, if possible.
- Move and keep people away.
- Do not physically contact materials.
- Avoid inhalation of fumes.
- Do not assume it is harmless because of a lack of smell.

## **3. Recognition and Identification**

- Emergency Response Guidebook (ERG) – attempt to identify the United Nations (UN) Number or other identifying features (i.e. color, container shape, etc) – University Police is supplied with the ERG.
- Chemical Inventory information is available through EHS Office and on file in the University Police Dispatch Center and the Brockport Fire Department. Each inventory is listed by building number and room number.
- Collect as much information, however insignificant it seems, and write it down.
- Relay information back to EHS or University Police (UP) depending on circumstances and time of day.

## **4. Responding Units**

- Initial contact should be made to Julie Caswell, Director of EHS (X2495) –cell phone number is provided in table Emergency Coordinators Telephone Numbers in the front of this Plan.

- Assess Situation - if an emergency cannot be handled by SUNY Brockport faculty/staff (judgment call), you may call in outside help immediately. Attempt to contact an EHS Office representative first. The Brockport Fire Department is the principal responder to any chemical, biological and/or fire incident.
- University Police is to escort outside responders in accordance with protocol.

## **5. Protective Clothing**

Unless trained in the use of Personal Protective Equipment (PPE), do not attempt to enter incident scene. Wait for those who are trained. (Exception: to remove someone in life/death situation who is **not in a confined space – never enter a confined space to save someone who is down.**

## **6. Spill Kits**

Spill kit barrels are stocked with absorbent material, containment booms, neutralizing chemicals and clean-up utensils. Spill clean-up materials available from Central Stores – Chapman building. These materials should be used by trained personnel or on direction by Environmental Health and Safety staff.

## **7. Fire Extinguishing Systems, Alarm Systems and Communications**

Hazardous Waste Storage Areas: the Volatile Storage Building (Smith & Lennon) and the Hazardous Waste Shed (Chapman) are both provided with an automatic fire suppression system. The Tower of Fine Arts is not provided with a fire suppression system but is provided with explosion-proof electrical wiring and exhaust fan. Fire Alarm system pull stations are located directly in the area and signs are provided for the location of the fire alarm pull station near the Tower of Fine Arts storage area. Spill kits and small-scale decontamination equipment are located in each hazardous waste storage area. Large-scale decontamination would need to take place at the Student Health Center in Hazen Hall or the shower facilities at Chapman.

## **8. Exempt Neutralization Operations**

Basic acid/base neutralization processes take place in Lennon Hall, Earth Science Lab, Room B-12, and in Tower of Fine Arts, Printmaking, Room 2209. Metals precipitation/batch neutralization takes place in Smith Hall, Room 212, sporadically.

## **9. Mutual Aid**

The Brockport Fire Department has the primary responsibility to respond to emergencies on our campus and this is spelled out in writing.

# **B. Hazardous Materials Response Procedures - University Police (UP) and other SUNY Brockport Staff**

## **1. Communications Officers Responsibilities – Dispatch Center**

Upon receipt of a report of an incident involving hazardous material, initiate the following:

- Gather as much information regarding the incident as possible with emphasis on the exact nature of the materials involved. Use chemical emergency sheet located in the University Police (UP) Dispatch Center.
- Dispatch contacts (as soon as possible):
  - One mobile unit
  - University Police (UP) Supervisor, who shall contact the Chief of University Police immediately.
  - University Police has the primary responsibility for responding to emergencies and will initiate the Campus Incident Management System as required in the written plan.
  - Environmental Health and Safety (EHS) office personnel: Julie Caswell, Director of EHS – cell phone (585) 233-0372 or Elizabeth Gregory, Assistant Director of EHS – cell phone (585) 690-4676.
  - Contact Facilities and Planning (24 hour) Report number (if necessary) at (585) 395-2408.
  - By paging (Facilities and Planning) F&P staff assigned to building after hours (if appropriate).

- As soon as it is determined, by information from responding units, or upon the discretion of the University Police (UP) Supervisor or the University Police (UP) Communications Officer, that the Fire Department is necessary – emergency contacts must be made as described above. Furthermore:
  - If, while the Fire Department is in route, additional information becomes available, this information must be given to the Fire Department immediately upon arrival or as soon as possible.
  - A University Police Officer should be available for Brockport Fire Department escort, as needed.

## 2. University Police (UP) Officers' Responsibilities

- A. Upon arrival, the University Police (UP) Officer(s) will assess the situation as follows:
- Approach the incident from an upwind direction
  - Attempt to make contact with area representative to gather details relating to the incident (i.e., spill, release, fire, etc.).
  - **DO NOT physically contact the material**
  - Avoid inhalation of fumes (Do not assume it is harmless because there is a lack of noxious odors)
  - Report back to the dispatcher immediately the magnitude of the incident
  - Initiate evacuation, if necessary
  - If the emergency necessitates outside agency involvement, have the dispatcher make proper notifications
  - Prior to the arrival of the Fire Department, make an attempt to identify the chemicals involved and secure the area – the Department of Transportation (DOT) Emergency Response Guidebook should be available which MAY or MAY NOT provide a source for identifying characteristics and hazards of the material(s)
  - Keep unauthorized personnel away and out of any visible chemical plume.
  - Keep Communications Officer informed of any new information so that he/she may relay that to other units/agencies responding.
- B. Recognition and Identification of Hazardous Materials can be assisted by the following resources:
- Emergency Response Guidebook - can be used to identify materials by using United Nations (UN) Numbers and other identifying features (i.e. color, container shape, etc). These books are located in the Dispatcher Center and Patrol Cars.
  - Master Chemical Inventory - a print out located in the Dispatch Center that can identify materials according to where they are used/stored listed by building name and room numbers. The Brockport Fire Department also

- has a copy of the chemical inventory.
- Any information, however insignificant it seems that can be collected at the scene, can be used to aid in the identification of unknown materials.

### **3. University Police Supervisor Responsibilities**

- A. Monitor and respond, as necessary, to all reports of hazardous material incidents as follows:
- The Supervisor on duty coordinates University Police personnel that are responding to an incident in order to assure full coverage.
  - Establish a secure command post with the Brockport Fire Department or other responding agencies
  - Make yourself available to the Fire Chief
  - Make sure all SUNY Brockport internal notifications are made
  - Make adjustment in assignments and dispatch as necessary
- B. Upon arrival of the Brockport Fire Department, the Chief Officer of the Brockport Fire Department will assume command of the situation. At this point, our responsibility is to follow the instructions of Brockport Fire Department. This may involve traffic/pedestrian control, notifications to other agencies, establishing a command post, maintaining order and/or controlling access to the incident.

### **4. Environmental Health and Safety Responsibilities**

Upon arrival EHS personnel will assume the role of principal liaison between SUNY Brockport, Brockport Fire Department and/or other government response agencies. EHS will immediately assess the magnitude of the problem and determine if outside agency response is necessary (unless it has already been done). The primary concern and priority will be the protection of human health followed by the environment. The following action items should be addressed:

- Determine if outside agency response is necessary (unless already contacted) – only the Brockport Fire Department can call upon the Monroe County Hazmat Team to respond
- If appropriate, respond with clean up measure to control the spill and avoid pollution of other areas
- Act as the primary liaison with outside agencies dealing directly with the spill response
- Call in outside resources to assist in clean-up of the spill if deemed

- appropriate
- Record and document all information generated regarding the incident with the objective of preparing a comprehensive final report covering the incident

## **5. Handling of Spills and Spill Reports**

- A. In the absence of Environmental Health and Safety personnel it may become necessary to access the chemical spill kits for use by the Brockport Fire Department.
- B. Spill Kit Containers (60-gallon over-pack barrels) are stocked with absorbent material, containment booms, neutralizing chemicals, magnetic drain covers, and clean-up utensils. ONLY trained personnel should use the spill clean-up materials.
- C. The spill kits are located in:
  - 1- Facilities and Planning – Central Stores in Chapman Building
  - 2- Volatile Storage Building located between Smith Hall and Lennon Hall,
  - 3- Tower of Fine Arts east loading dock (the room is labeled Hazardous Waste Storage Area), and Room B-3 (west end basement of Tower Fine Arts).
  - 4- Hazardous Waste Shed located on the west end of Chapman and the mobile EHS club car (Emergency Response Vehicle) also contains spill clean-up materials.
  - 5- Spill clean-up materials are also located at various petroleum/oil storage locations (5-gallon spill kits) on campus. The two 4,000-gallon gasoline and diesel tanks located at the Commissary have 60-gallon overpack spill kits at each location. We also have labeled spill kits at each of the gasoline and diesel pumping stations. Shipping and receiving also stores kitty litter and some limited spill absorbents.

## Section II – Hazardous Waste Handling – The Basics

1. It is SUNY Brockport policy that any container (barrels, lamps, paint cans, boxes, etc.) whether empty or full, should not be stored outside. The reason for this policy: containers stored outside (unprotected) have a greater potential to deteriorate, leak or collect rainwater. If a container absolutely needs to be stored outside, it must be protected – covered and on a skid to protect it from rusting. Hazardous waste materials must be compatible with the container – call EHS staff if any questions.
2. **Unknowns** – each chemical waste material needs to be identified by the generator to allow for proper classification and disposal. It is the responsibility of those who are handling or generating the chemical waste material to identify the material. Otherwise, EHS cannot properly dispose of the material. Review the contents label, the Material Safety Data Sheet (required for every chemical material on campus) or contact the supplier to acquire the necessary information to identify the material. If unable to identify, contact EHS (X2495 or X2005). Sampling the waste material may be necessary at a substantial cost and will be charged to the department generating the waste. If EHS cannot determine the identity of the chemical or who generated it, the cost associated with identification or sampling will be charged to the department/college where the waste was generated or where the waste is located.
3. **Label** all waste containers – list the contents, use the hazardous waste ID tag provided by the Environmental Health and Safety Office (or provide the same information as the listed form). The label must include the date when the container first enters any 90-day waste storage area/vault. It must contain the following information:
  - ❑ Name of the chemical or CAS #, no formulas allowed
  - ❑ Name of the person or department generating the waste – where did it come from and who do we call if there are questions?
  - ❑ Date the container is full or is transported to a 90-day hazardous waste storage area.
  - ❑ Category of Chemical: such as Flammable, Oxidizer, Air Reactive, Water Reactive, Poison, Acid, Base, Carcinogen, or Acute Toxic
  - ❑ The words “Hazardous Waste” must be attached to the container.
  - ❑ Labels are available from EHS Department personnel.
4. **Segregate** incompatible waste streams (i.e., organic, inorganic, corrosive, flammable). If you have questions call EHS or consult the hazardous waste manual.
5. **Keep** hazardous waste containers closed at all times. Containers can ONLY be open when you are actually pouring materials into them. Gasoline, parts washer, glycols,



etc. bulk drums that are fitted with a funnel **MUST** have a closeable lid.

6. **Please provide** your name and department on the waste material container.

7. **Store** waste containers properly in designated areas.

***Satellite Accumulation Area Requirements: (Satellite Accumulation Area: Is defined as the exact location where the waste was originally generated): the container must be labeled as a “hazardous waste” and the chemical contents must be listed. There is no restriction on time while filling a container in the Satellite Accumulation Area. The maximum storage quantity is fifty-five (55) gallons of hazardous waste or 1 quart of acutely hazardous waste). Once a container if full, is must be moved to a 90-day storage area/vault within 3 days.***

***90-Day Storage Areas/Vaults:***

- Hazardous Waste Shed – west side of Chapman Bldg. (modular white bldg.)
- Volatile Storage Building – between Smith/Lennon Science Buildings
- Tower of Fine Arts loading dock (east side)

Facilities and Planning garage – Universal Waste ONLY (lamps, batteries, thermostats, light ballasts) **NO FLAMMABLE, or ACUTELY HAZARDOUS WASTE MATERIALS (i.e., F-listed waste) ALLOWED.**

8. **Waste minimization** by using less product, use least toxic materials, don't over order product, no donations, or surplus chemical reuse. Use up the material for its intended use, if at all possible.

9. **Do not** put liquids in dumpsters, dispose of any questionable products in dumpster, pour into storm drain, store waste drums/containers in unapproved areas, or put waste into designated storage without labels

10. **Train** your employees. All employees who handle hazardous waste are required to receive training annually. Please contact the EHS Office at X2495 or X2005 for scheduled training.

11. **Report spills immediately** to 395-2495 or 395-2005 (EHS daytime) or 395-2222 (University Police) at night. University Police will contact the Director of Environmental Health & Safety or a representative of the Environmental Health and Safety Office after hours.

12. **If there are any questions** call EHS at 395-2495 or 395-2005.

13. **To identify hazardous waste, you may refer to the New York State Department**

**of Environmental Conservation web site at:**

<http://www.dec.state.ny.us/website/regs/part370.html> - which includes all the applicable hazardous waste regulations. Click on Part 371 (Identification and listing of hazardous waste) for information on identifying hazardous waste.

## **A – Hazardous Waste Training**

The following identifies various OSHA, EPA and DEC regulatory requirements:

1. OSHA Hazard Communications Program 29 CFR 1910.1200
  - Hazard determined by manufacturer
  - Labeling requirements - raw product
  - Material Safety Data Sheets (MSDSs) on file - chemical inventory at SUNY Brockport
  - Employee training
  - Written program
2. OSHA Standard 29 CFR 1910.120
  - Hazardous waste operations and emergency response
  - Scope - waste only - operations involving hazardous waste
  - Treatment Storage Disposal Facilities (TSDFs) regulated under the Resource Conservation and Recovery Act (RCRA), Environmental Protection Agency (EPA), or NYS Department of Environmental Conservation (NYSDEC) - whichever is more stringent applies.
3. DEC Regulations Part 373-3.2(g)

Scope:

- Large Quantity Generator (LQG): >1000 kg/month or >1 kg/month Acutely Toxic
- Cannot store over 6000 kg at any time or a TSDF permit is required
- Small Quantity Generator (SQG): 100 -1000 kg/month, <1 kg/month Acutely Toxic
- Conditionally Exempt Small Quantity Generator (CESQG): <100 kg/month, <1 kg/month Acutely Toxic

Required Training:

1. Must be familiar with the Emergency Response Plan.
2. Personnel are able to respond effectively in emergency situations.
  - A. Procedures for inspecting, and monitoring emergency situations.

- B. Communications - who to notify.
  - C. Response to fires or explosions.
  - D. Response to ground water/surface water contamination.
  - E. Shutdown of operations.
3. Must complete training program prior to assignment to hazardous waste operations.
  4. Annual review.
  5. Documents and Records
    - A. Job title and each position related to hazardous waste management and the name of the employee filling each job.
    - B. Written job description - must include requisite skill, education or other qualifications and duties.
    - C. Written descriptions of the type and amount of both introductory and continuing training.
    - D. Records that document training and experience in a, b, and c, above.
    - E. Records kept on file until closure of the facility.

Training also required under RCRA and SARA Title III.

Training also required when involved with emergency response.

Level of Training	Hours of Training
Awareness	1 - 4 Hours
Operations	12 Hours
Technician	24 - 40 Hours and Experience
Specialist	48 Hours and Experience
Command	40 - 48 Hours and 16 Hours Operations Experience

**SUNY Brockport Focus will be on awareness for first responders.**

## **B – Hazardous Waste Identification**

1. What is a hazardous waste?

TO IDENTIFY HAZARDOUS WASTE, YOU MAY REFER TO THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION WEB SITE (hard copies are no longer available) at:

<http://www.dec.state.ny.us/website/regs/part370.html> - which includes all the

applicable hazardous waste regulations. Click on Part 371 (Identification and listing of hazardous waste) for information on identifying hazardous waste.

Is it a DEC/EPA listed waste?

- F-List: Non -specific sources
- K-List: Specific sources
- P-List: Acutely hazardous (1kg/month)
- U-List: Toxic (poisonous, carcinogen, toxic)

Characteristic Waste:

- Ignitable (Flash Point <140 F)
- Corrosive (2 > pH > 12.5)
- Reactive (water reactive, shock sensitive)
- Listed Waste Categories (D-listed, F-, K-, P-, U-)

**Hazardous Waste:** BENNER - "SUBSTANCE THAT JUMPS OUT OF ITS CONTAINER AT YOU WHEN SOMETHING GOES WRONG, AND HURTS OR HARMS THE THINGS IT TOUCHES".

## 2. Hazard Classes

- Class-A, -B, or -C explosives
- Combustible liquids, 100°F –200°F
- Corrosives, acid, or alkaline to cause damage
- Flammable liquid, flash point <100°F (<140°F if hazardous waste)
- Flammable gas
- Non-flammable gas -not labeled properly and can ignite
- Flammable solid
- Organic peroxide
- Oxidizer
- Poison A+B
- Irritating material
- Infectious – "regulated medical waste"
- Radioactive - white, yellow, and magenta
- UN Hazard Labels
- NFPA 704 System
- Rule of thumb for labels: Danger-Warning-Caution (more to less danger)

## 3. Detecting Hazardous Material Presence

- UN number, other identification numbers, labels
- Location, physical state
- Container shape, type of container
- Color, smell, plume, reaction
- Shipping papers, MSDS

4. Sizing up Incidents – refer to emergency response plan
  - Problem Identification - type of material, potential hazards, stage of incident - container behavior (bulged, leaking, etc.)
  - Modifying Conditions:
    - Location
    - Time
    - Weather - stay up -wind at all times
  - Potential Hazards:
    - Civilian
    - Emergency personnel
    - Environmental - can it be controlled
  - Control Measures:
    - Personnel and equipment
    - Extinguishing agents
    - Containment and cleanup materials - spill kits
  - Basic Objectives:
    - Rescue endangered persons
    - Contain material
    - Protect exposures
    - Use available resources
  - Personal Protective Equipment (PPE) - IF A RESPIRATOR TO BE WORN EMPLOYEE MUST BE TRAINED, FIT-TESTED, AND PROVIDED MEDICAL SURVEILLANCE.
  - PROTECTIVE CLOTHING (PPE) is available through the Environmental Health and Safety Office, BUT WILL NOT BE USED BY PERSONNEL, OTHER THAN TRAINED PERSONNEL.
  - USE OF PPE WILL ONLY BE ALLOWED IN EMERGENCY, LIFE-THREATENING SITUATION WHERE NO OTHER ALTERNATIVE IS AVAILABLE.
  
5. Storage Procedures - DEC Regulations:
  - Container must be closed and handled in a way not to rupture it. Containers must be protected from moisture, weather and damage. Containers must be DOT-Approved and compatible with product or waste contained.
  - Incompatibles cannot be stored in same container.
  - Containers must be labeled with all contents listed - accumulation date on label.
  - Can store up to 55-gallons of hazardous waste at site of generation (i.e., satellite accumulation area) or 1kg of acutely hazardous waste.
  - Weekly inspection/log required of each 90-day hazardous waste storage area.

- 1,000 kg of hazardous waste generated in any one month or 1 kg acutely toxic waste (i.e., P-listed waste) – classified as a Large Quantity Generator.
- Cannot be stored unless accompanied by contents, source, and dates. Unknowns will be evaluated on a case-by-case basis. We **cannot** be creating unknowns. Costly to analyze unknowns = \$1,500.00/each sample and analysis (TCLP). Cost to be charged back to the location or department generating the waste or where it was found.
- Uniform labels to be used at SUNY Brockport, or equally complete information.
- Individual Material Safety Data Sheets (MSDSs) for each compatible chemical combined into a larger container (i.e., 25, 35, 55 gallon) must be provided and each component must be listed on a Hazardous Waste Contents Sheet. The generator of the waste is responsible to obtain MSDSs for raw products that become waste.

#### 6. Manifesting

- Cradle to grave record
- Copy (8) goes to disposer state, generator state, disposer and back to generator.
- Annual report and reduction required.
- The disposal facility must provide a return copy (indicating they received the shipment) to the generator within 35 days. If it becomes more than 45 days an exception report must be filed with NYSDEC,
- Land disposal restriction form (LDR) – required for all lab packs and most bulk wastes which indicates the material was not landfilled.
- **Do not sign manifest unless you are approved to do so from EHS. Note: DOT regulations require a level of competency for anyone who signs a hazardous waste manifest.** Large fines, and enforcement actions are becoming commonplace – if you sign the manifest, you may become liable for what happens to it.
- **All waste disposal activities must go through EHS office, as they are solely responsible for Environmental Protection Agency (EPA) and NYS Department of Environmental Conservation inspections, manifesting and annual reports. Contact EHS at X2005 for assistance.**

## Section - III Other Waste Materials

This section of the Plan details procedures for universal and electronic waste streams.

### A - Universal Waste

- Fluorescent lamps, batteries, pesticides, and thermostats containing mercury are considered universal waste and must be managed according to regulations.
- Green dot fluorescent lamps (fluorescent lamps that do not contain significant amounts of mercury) may be disposed of as regular solid waste. Care must be taken to assure these lamps DO NOT contain mercury and the manufacturer's label indicates and environmentally safe lamp. All other fluorescent lamps must be handled/disposed of through a hazardous waste vendor.
- Batteries containing lead/lead-acid material can be returned for reclamation/recycling. Nickel-cadmium, lithium, or other heavy metal batteries need to be disposed through a hazardous waste vendor.
- Any pesticide material at SUNY at Brockport will be disposed of as a hazardous material through our hazardous waste vendor.
- Universal waste may be stored for up to one year maximum.
- Each waste container or individual batteries and lamps must be dated when it becomes a waste – which is defined as when it is no longer useful.
- All universal waste materials must be managed in a manner that prevents releases to the environment. Broken lamps must be cleaned up immediately and disposed of properly as hazardous waste - not in the regular trash.
- All universal waste **MUST BE LABELED AS UNIVERSAL WASTE AND DATED. THE FULL BOXES CONTAINING LAMPS NEED TO BE TAPPED CLOSED.**
- **All waste fluorescent lamps, once packaged and full, must be placed in the white garage behind the old boiler plant. The X key provides access to the garage.**
- **The following label is provided for properly labeling Universal Waste and is available thru the EHS Office:**

# SUNY Brockport Universal Waste

- Lamps
- Batteries (CHECK ONE)
- Thermostats

## Universal Waste Checklist

- This label on box
- Box in good condition
- Lamps unbroken
- Box closed (check each as they are completed)
- Box taped
- Date went into storage \_\_\_\_\_
- From building(s) \_\_\_\_\_
- Your name/dept (print) \_\_\_\_\_

## B - Electronic Waste

### Computer/Electronic Waste procedures

**Definition of Electronic Waste:** All monitors (including TVs), CPUs, keyboards and copiers must be considered a hazardous waste material due to the content of lead, silver, cadmium and other heavy metals used in their manufacture. They cannot be disposed of as regular trash and must be disposed of in accordance with New York State Department of Environmental Conservation (NYSDEC) rules contained in 6NYCRR 371.1. SUNY Brockport has chosen to recycle and reuse computer/electronic equipment in a conscientious manner, providing maximum protection to the environment while maintaining compliance with New York State rules and regulations.

**Computer/electronic waste cannot be disposed of in the regular trash stream (this law does NOT apply to individual private residents).**

- **To Surplus:** Electronic equipment that is in working order, with the processor working and/or the monitor working may be handled as surplus equipment as described in the **Surplus Equipment Policy**, which is available through the Facilities and Planning Website at: [https://www.brockport.edu/support/procurement\\_payment/property\\_surplus](https://www.brockport.edu/support/procurement_payment/property_surplus)
- **To Dispose of:** When preparing computer/electronic equipment for disposal (recycling), care should be taken to assure that sensitive information is removed permanently from the computer, and that copyrighted software agreements are not violated. It is suggested that computer hard drives be reformatted to remove all files. If there are questions on this issue, please contact Information Technology Support Services, Mary Jo Orzech at X2368.
- **Prior to Disposal:** In order to minimize waste and maximize reuse of equipment, please contact the Information Technology Support Services Help Desk at X5151 prior to calling for disposal pickup. This will allow Information Technology Services (ITS) to evaluate potential reuse of the equipment/accessories.



- **Arranging Pickup:** Please complete a **Surplus/Transfer** request form, which is available from the forms center on the SUNY Brockport Home Page at: [https://www.brockport.edu/support/procurement\\_payment/docs/surplus\\_transfer\\_form.pdf](https://www.brockport.edu/support/procurement_payment/docs/surplus_transfer_form.pdf) or by calling X2546. By completing this form, the Facilities & Planning staff will be able to effectively schedule a pick up of the computer/electronic waste. It would greatly enhance the efficiency of handling and storing electronic waste if each department could temporarily store a limited number of computers instead of scheduling a pick-up for one or two computers.
- **Cost:** The Budgeting/Procurement office has recently adopted a PC Disposal Fee Policy, which stipulates an automatic \$10 disposal surcharge on computer equipment purchased after March 1, 2001. There is NO CHARGE for disposal of computer equipment purchased before this date.
- **IMPORTANT NOTE:** Computer/electronic equipment cannot be placed in the regular trash, a dumpster, or other form of illegal disposal. If illegal disposal of computer/electronic waste is discovered, the EHS Office will be notified and the Dean/Department Head (for that area) for appropriate action. The potential penalties (criminal and civil) for violating these regulations are substantial.