

Hazardous waste compliance challenges of a small college.

There are three areas of concern that challenge a small college campus in concern to hazardous waste collection and disposal. First, collection, storage and labeling, second personnel issues, and thirdly training.

A small campus usually has no designated storage site for hazardous waste. It is stored by department. Building and grounds will store paint in the paint shop. Spray cans where ever they land. The art department stores paint thinner and solvents under the sink. The laboratories have flammable cabinets in labs, stockrooms or closets. The labs will store waste in hoods, under hoods and in the chemical stockroom. Satellite accumulation areas become storage locations as there is no place put it away. Labeling is done in a hap hazard manner. Labels can be distributed but not used. A lot of hazardous waste ends up no being labeled.

Universal waste is also difficult to collect. Again there is no central store for universal waste. Lamps are in every nook, under stairs, in boiler rooms, and in closets. They are side by side with good lamps and may or may not be labeled. Batteries are just not collected. Mercury containing devices go out as hazardous waste and oil accumulates in various areas. Regulated medical waste is taken care of by the health center independent of the laboratories and may be handled differently. .

Personnel issues start without a person in charge of hazardous waste. There is no Environmental Health and Safety Department. Health and Safety fall on the shoulders of a Vice President usually the treasurer, whose other duties, seem more pressing. Everyone becomes responsible for their own hazardous waste. Professors are making waste determinations. Students are making waste determinations. B&G painters are sorting paint and thinner wastes. Athletics are saving paint cans. Theater students and technicians are collecting spray cans and solvents. The art professors are pouring solvents down the sink. Getting the message to these personnel on what constitute hazardous waste is tough. Making it a priority to them is even tougher. They would like to pass the duty on to someone else or just say they don't have any hazardous waste. I have seen B&G collect spray field line paint but not any other type of paint. Professors have dumped down the drain chemicals they did not know to be hazardous. One poured bromothymol blue down the drain and when it came back at her turned her and her clothes a nice shade of blue.

I believe training is the third big issue. There is no trainer on campus. Training falls on the individual departments. B&G will train housekeeping, carpenters, painters and lighting personnel. The sciences train their own personnel. Theater and the Arts seem to be left out all together. The second half is who gets trained. With so many people responsible for their own hazardous waste training personnel who must collect is near to impossible. Trying to get professors to trainings is near impossible. Students are always changing. Technical help is a logical solution but are not in every department.

I would like to hear what other small campuses are doing to resolve these issues.

So let's make a list of how you do it and see if it we can improve on methods to ensure compliance.

### Collection and storage

1. Collection
  - a. Laboratories
  - b. B&G
  - c. Theater and Art
2. Satellite collection
3. Universal waste collection
  - a. Lamps
  - b. Batteries
  - c. Oil
  - d. Mercury
  - e. Electronics
4. Storage
5. Labeling

### Personnel

1. Who is ultimately responsible
2. Who makes the waste determination

### Training

1. Who is trained
2. Who trains