



UNIVERSITY *of* NEW HAMPSHIRE

Hazardous Waste Management Plan

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I. Introduction

Safe and environmentally sound management of hazardous waste is an integral part of the University of New Hampshire (UNH) mission. UNH is committed to meeting the stringent federal, state, and local regulations pertaining to the management of hazardous waste. Responsibility for compliance with hazardous waste regulations begins with those generating waste material and continues through the complicated disposal and delivery process. Escalating concern for environmental quality and regulatory compliance underscores the importance of waste generators to ensure that the hazardous waste they generate is properly managed. Failure to comply with regulatory requirements has resulted in significant fines and liability, increased costs, and adverse publicity. For these reasons, UNH has developed a **Hazardous Waste Management Plan** designed to communicate the methods UNH will use to properly manage hazardous waste and has committed the resources necessary to ensure compliance with this program and applicable regulations.

The Office of Environmental Health and Safety (OEHS) is responsible for directing UNH's Hazardous Waste Management activities. These responsibilities include managing the collection, processing, and disposal of chemical waste and providing resources for other hazardous waste and environmental compliance responsibilities. For the purposes of this program, the term "waste" refers to **chemical material that is unusable or unwanted by the person controlling the material**. Trained personnel, under the direction of the UNH Coordinator of Hazardous Waste, will make determinations of whether a material is hazardous waste, reusable material, recyclable material, or any one of several regulatory defined materials or processes.

The purpose of this program is to provide information and guidance on hazardous waste generation, storage, packaging, record development/maintenance and general management of hazardous and non-hazardous chemical wastes. To assist UNH in providing a safe and environmentally sound operation, each department is expected to review, understand and follow the information and guidance provided in this Hazardous Waste Management Plan. Questions regarding hazardous waste management at UNH should be directed to the Coordinator of Hazardous Waste.

II. Regulatory Authority

The New Hampshire Department of Environmental Services (NHDES) and the United States Environmental Protection Agency (USEPA) regulates the management of hazardous waste. The respective regulations can be found in 40 CFR 260-268 and Env-Wm 100-1100. The State of New Hampshire is an authorized state, meaning the NHDES has been given authority by the USEPA to administer hazardous waste regulations. NHDES regulations meet the requirements set out by the USEPA, and the NHDES regulations are at the least, as stringent as the federal requirements. Therefore, this plan will refer to the NHDES regulations only, given that they either meet or exceed the federal requirements for hazardous waste management in New Hampshire. In cases where there are no NHDES regulations or where the NHDES regulations refer to USEPA regulations, USEPA regulations will be cited.

III. Roles and Responsibilities

A. Deans, Directors, Department Chairs, and Administrators

1. Require faculty, staff, and students to adhere to the requirements listed in this plan.
2. Require faculty, staff, and students who handle or generate hazardous waste to receive Hazardous Waste Management Training.
3. Require inspections of all locations where hazardous waste is stored to ensure it is being managed properly.
4. Designate a Safety Committee Representative to help resolve problems that may arise due to the improper storage, use, labeling, and disposal of hazardous waste.

B. Hazardous Waste Handlers

1. Read and understand the Hazardous Waste Management Plan.

2. Take the Hazardous Waste Management Training.
3. Inspect locations where hazardous waste is stored to ensure it is being managed properly.
4. Properly label, store, use, and dispose of hazardous waste as described in this plan.

C. Coordinator of Hazardous Waste

1. Maintain appropriate and current hazardous waste certifications.
2. Maintain applicable and relevant Hazardous Waste Management Training content.
3. Audit the Hazardous Waste Management Plan at least annually.
4. Inspect the Central Hazardous Waste Accumulation as required by law.
5. Review laws and regulations for changes impacting hazardous waste.
6. Ensure proper reporting to the Environmental Protection Agency and the New Hampshire Department of Environmental Services.

IV. Hazardous Waste Management Plan Organization

The Hazardous Waste Management Plan (HWMP) provides guidance for the safe and compliant management of hazardous waste by UNH. Additional guidance is provided in related OEHS programs and documents and from the Coordinator of Hazardous Waste. Reviewing the HWMP is the first step in understanding methods to minimize potential liabilities associated with the handling of hazardous waste and for ensuring compliance with applicable hazardous waste regulations. Additional information and guidance is provided through training and access to internal and contract resources.

V. Hazardous Waste Determination

The first step in the management of hazardous waste is to determine whether a material is a waste and if it is hazardous. Subsequent steps are used to properly classify the waste and determine the action necessary for proper management of the waste.

Materials are usually considered “waste” when the generator has determined that the material has no further use and will be discarded. **Hazardous waste regulations apply to any material that will be discarded, or is likely to be discarded.** The latter point is important because materials that have no further use and will eventually be discarded may be considered hazardous waste by regulatory agencies even though there are no current plans to discard the material. Therefore, it is imperative that OEHS or the Coordinator of Hazardous Waste be consulted if materials will be stored for long periods without use or if the use of a material is not anticipated for extended periods.

Waste materials can be solid, liquid, semi-solid or compressed gas. All such materials must be evaluated to determine if the hazardous waste regulations apply.

A. Determination Process

Simply defined, a hazardous waste is a material with properties that make it dangerous or capable of harming humans or the environment if not properly managed. Making the determination of whether a waste is hazardous is complicated and requires an extensive understanding of such information as the waste constituents, how it was generated, the material’s chemical and physical characteristics, understanding of USEPA and NHDES regulations and experience classifying waste products. Basically, the regulatory requirements for determining whether a waste is a hazardous waste are made by answering the following questions:

- Is the material excluded from the definition of solid or hazardous waste?
- Is the material exempted from regulation?
- Is the waste listed as a hazardous waste in the USEPA Tables?
- Does the waste exhibit one or more of the four hazardous characteristics: ignitability, corrosivity, reactivity or toxicity?

- Is the material a state regulated waste?

A material is considered to be a hazardous waste if the USEPA or the State of New Hampshire specifically lists it as a hazardous waste or if it exhibits a hazardous characteristic.

Two methods can be used to determine if the waste exhibits hazardous characteristics: testing or applying generator knowledge. Testing must be done following strict regulatory protocols established by the NHDES and USEPA. Generator knowledge involves applying an understanding of the hazardous nature or characteristics of the waste based on the materials or processes used to generate the waste.

The Coordinator of Hazardous Waste or the Hazardous Waste Specialist will make the determination as to whether a waste is hazardous or non-hazardous.

B. Non-Hazardous Waste

If a waste is not listed as a USEPA or NHDES hazardous waste or does not exhibit any of the hazardous waste characteristics, it is a non-regulated (non-hazardous) waste. It is important to note that non-regulated and non-hazardous by USEPA and NHDES does not mean that a waste does not exhibit any characteristics that could be harmful to human health or environment. Therefore, it cannot be assumed that these wastes can be disposed via the sanitary sewer, or with other solid wastes. Contact the Coordinator of Hazardous Waste or the Hazardous Waste Specialist for guidance in disposal of non-hazardous chemical wastes.

C. Universal Waste

Universal waste is a category of hazardous waste that poses less of a risk to human health and the environment. Universal wastes include lamps, batteries, intact mercury containing devices, cathode ray tubes, some pesticides, and antifreeze. As the name suggests, these types of waste are universally generated, in nearly every type of business or industry, in schools, and in private homes.

Universal wastes are managed in accordance with the NHDES Requirements for Universal Waste Management (Env-Wm 1100). The [Universal Waste Management Plan](#) has been developed that outlines the procedures the University will take to properly manage universal wastes.

D. Waste Code Designation

After a material has been determined to be a hazardous waste, the next step is to designate a code for the waste. To minimize errors in designating hazardous waste codes, the classification process is managed by the Coordinator of Hazardous Waste or Hazardous Waste Specialist

The Durham campus has Full-Quantity Generator (FQG) status and OEHS designates waste codes when waste container custody has been transferred to OEHS employees. In order to maintain Small Quantity Generator (SQG) status, trained personnel at the UNH Manchester and the Jackson Estuarine Laboratory designate the waste codes onto the hazardous waste label.

VI. Generator Status

Concurrent with determining whether a regulated hazardous waste is being generated, the generator classification must be determined. Each generator category has specific generation, accumulation and storage requirements and corresponding time limits. Knowledge of the generator category enables UNH to ensure that the quantity of waste generated, how the waste is accumulated and storage time limits, etc., comply with NHDES requirements.

UNH currently manages one Full Quantity Generator (FQG) and two Small Quantity Generator (SQG) locations. Therefore UNH will meet the following generator and accumulation criteria in the respective locations:

A. Full Quantity Generator (FQG)

Location: UNH Durham Campus

Generation: An FQG generates greater than or equivalent to the following quantities:

- 100 kg/month (220 pounds) of hazardous waste in any single month; or
- 100 kg/month (220 pounds) of spill cleanup material contaminated with acutely hazardous waste in any single month; or
- 1 kg/month (2.2 pounds) of acutely hazardous waste in any single month.

Accumulation: An FQG accumulates greater than or equivalent to the following quantities:

- 100 kg/month (220 pounds) of spill cleanup material contaminated with acutely hazardous waste in any single month; or
- 1 kg (2.2 pounds) acute hazardous waste on-site at any time.

B. Small Quantity Generator (SQG)

Locations: Jackson Estuarine Laboratory and UNH Manchester Campus.

Generation: A small quantity generator generates less than the following quantities in each calendar month:

- 100 kg (220 pounds) of hazardous waste;
- 1 kg (2.2 pounds) of an acutely hazardous waste; and
- 100 kg (220 pounds) of any residue or contaminated soil, waste, or other debris resulting from the cleanup of a spill of any acutely hazardous waste.

Accumulation: A small quantity generator may accumulate up to:

- 100 kg (220 pounds) of hazardous waste; and
- 1 kg (2.2 pounds) of acutely hazardous waste.

If waste generated at an SQG exceeds the monthly limitation, the generator must notify NHDES that it is now a Full Quantity Generator (FQG) and is complying with all FQG requirements. A SQG may accumulate more than 100 kg (but less than 1000 kg) of non-acutely hazardous waste if the SQG Extended Quantity and Storage Provision is followed (see [Section VIII.B](#) of this document for provision requirements).

VII. USEPA Identification Numbers

USEPA requires all hazardous waste generators to register their generator status by obtaining a USEPA Identification Number. This number is used to track waste from generation to ultimate disposal, and beyond. UNH must obtain a USEPA ID number before treating, storing, disposing, recycling, or transporting (or offering for transport) hazardous waste. USEPA ID numbers are site-specific numbers assigned to generators, transporters, and treatment, storage, disposal or recycling facilities, and need only be obtained once.

UNH requested and obtained USEPA ID numbers (please refer to the following table for more information).

Table 1: USEPA ID Numbers

Location	USEPA ID #	Status	Comments
Durham Campus Perpetuity Hall	NHD 000790923	Full Quantity	Central Accumulation Facility
Transportation Garage	NHD 982746760	Not a Generator	Not generating hazardous waste
Jackson Estuarine Laboratory	NHD 986482669	Small Quantity	-
Manchester Campus	NHD 986482859	Small Quantity	-

VIII. Storage Requirements

Proper storage of hazardous waste is critical to ensuring personnel safety and regulatory compliance. Accumulation quantity limits, accumulation time limits, storage and handling methods, etc., are factors that affect safety and regulatory compliance.

A. Full Quantity Generator Storage

For the Durham campus, UNH has established a designated Central Accumulation Area (CAA) where waste is stored awaiting transportation off-site to a Treatment, Storage, Disposal, and Recycling Facility (TSDRF) and has developed a temporary storage program that permits waste to accumulate near the point of generation. Temporary storage areas are referred to as Satellite Accumulation Areas (SAA).

The requirements for hazardous waste storage involve the selection of proper waste containers, waste identification and labeling, establishment and storage in designated locations (SAAs and the CAA), meeting specified time limits and movement from an SAA to the CAA pending shipment off-site to a TSDRF.

1. Central Accumulation Area (CAA)

a. Requirements

Once the waste storage containers in the SAA are filled, the Responsible Person must immediately arrange for transport to the CAA for subsequent storage and eventual removal from UNH. Waste may be stored in the CAA for a period not exceeding 90 days. Waste stored by UNH in the CAA, or any other location for a period exceeding 90 days (other than in a properly established and managed SAA) would constitute un-permitted storage and could result in substantial fines and penalties by either the NHDES or USEPA, or both.

A full quantity generator may accumulate waste in a CAA for up to 90 days provided the following requirements are met:

- All hazardous waste will be placed in appropriate containers or tanks and must remain closed at all times except when adding or removing waste
- All hazardous waste will be stored on impervious surfaces;
- Hazardous waste will not be stored in areas with functional floor drains or in or near a sink with a functional drain present unless adequate secondary containment is provided;
- Generators must make weekly inspections of all hazardous waste storage areas;
- Generators must provide personnel training in hazardous waste management by either an outside contractor or in-house employee who has been adequately trained;
- Generators must meet general requirements for storing ignitable, reactive, or incompatible wastes;
- Generators must comply with 40 CFR Part 265 Subpart C Preparedness and Prevention, including:

- Maintaining spill control equipment and fire control equipment at or near each waste storage area;
 - Posting “No smoking” signs near ignitable and/or reactive waste; and
 - Maintaining a minimum of two feet aisle space to allow inspection of at least one side of each container.
- Generators must have a written contingency plan detailing emergency procedures;
 - Generators must comply with 40 CFR 265 Subpart J detailing use and management of containers, and
 - Generators will post a list of steps to take if an emergency occurs and emergency numbers at the telephone nearest to each hazardous waste storage area.

Additional Requirements for outside storage:

- Generators must provide an artificial or natural barrier preventing unauthorized entry;
- Generators must provide a means to control entry;
- A sign with the words “DANGER- UNAUTHORIZED PERSONNEL KEEP OUT” must be posted at the entrance; and
- All hazardous waste stored outside must be covered and stored at least 50 feet away from surface water.

b. CAA Location

UNH has established one CAA adjacent to Perpetuity Hall.

c. CAA Inspections

The CAA is inspected weekly. See [Appendix A](#) to view the CAA inspection requirements. The Coordinator of Hazardous Waste or his alternate inspects the area. Documentation of the inspection is maintained in OEHS.

2. Satellite Accumulation Area (SAA) Locations – Temporary Storage

a. Requirements

Both NHDES and USEPA regulations permit temporary storage of hazardous waste, termed “accumulation”, but with differing requirements. By complying with the more stringent NHDES requirements for satellite storage, the requirements of USEPA are also being met.

Temporary storage of hazardous waste that is maintained at or near the point of generation is known as satellite storage. The area where this occurs is known as a SAA. Temporary accumulation permits storage of waste adjacent to the point of generation for the purpose of minimizing handling and risk, increasing disposal efficiency and controlling costs.

Trained staff members in OEHS move full or unneeded waste containers from SAAs to the central accumulation facility.

In New Hampshire, only FQG are permitted to accumulate hazardous waste in SAAs. These areas permit an FQG to accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste (the accumulation limits) in containers at or near the point of generation without a permit, if the following requirements are met:

- Containers are under the control of a Responsible Person for the process generating the waste; the Responsible Person has been trained in accordance with UNH's hazardous waste training requirements (see [Section XIII](#));
- The environmental and health requirements of Env-Wm 506 are met;
- Waste is properly labeled;
- Monthly inspections are conducted for those SAAs that accumulate 10 or more gallons of hazardous waste;
- Containers that reach the accumulation limits (55 gallons of hazardous waste or one (1) quart of acutely hazardous waste) are dated and the full container is moved to the CAA within three (3) days of reaching the accumulation limit; and
- The full container that has been relocated to the CAA is shipped off-site within 90 days of meeting the accumulation limits.

Failure to comply with these provisions may result in a determination that the area is an unpermitted storage area. **This would be considered a violation of USEPA and NHDES requirements and could result in substantial fines and penalties.**

b. SAA Locations

The UNH Office of Environmental Health and Safety maintains a complete listing of SAAs. Please contact the Coordinator of Hazardous Waste for more information.

c. SAA Inspections

SAAs that have an accumulation of greater than or equal to 10 gallons of hazardous waste must be inspected monthly. See [Appendix B](#) to view the SAA inspection criteria. The Responsible Person or designee will inspect each SAA under their control. Documentation of the inspection is electronically maintained in the OEHS database located at <http://www.cems.sr.unh.edu/>. Only individuals trained by OEHS are permitted access to the electronic inspection form. To view reports, follow these instructions:

- 1) Log into UNHCEMSTM at <http://www.cems.sr.unh.edu>.
- 2) On the homepage, under the "Compliance Officer" section, find the drop-down list next to "Manage Report Data." Select the SAA Inspection Log report.
- 3) By default, the most recently submitted SAA inspection reports will be displayed, showing the location and date of the report. To view a report in its entirety, click on the "Edit" button.
- 4) To view the answers to multiple reports, expand the table by clicking on the (+) button, then choosing another field from the drop-down menu above each column. Any column can be filtered to search for specific criteria.

B. Small Quantity Generators Storage

1. Requirements

A Small Quantity Generator (SQG) whose quantity of waste accumulated on site never exceeds 100 kg of hazardous waste or 1 kg of acutely hazardous waste may accumulate hazardous waste on site indefinitely with no inspection requirements provided that the following requirements are met:

- While accumulating hazardous waste, the SQG shall not use storage practices that pose a hazard to human health or the environment;

- Hazardous waste shall be placed in appropriate containers or tanks and remain closed at all times except to add or remove waste;
- Hazardous waste must be stored on an impervious surface;
- Hazardous waste shall not be stored in areas where functional floor drains are present or in or near a sink with a functional floor drain unless adequate secondary containment is present;
- Hazardous waste stored outside must be kept covered and must not be stored within 50 feet of a surface water;
- Spill control equipment must be maintained at or near each point of waste storage;
- “No Smoking” signs must be posted where ignitable and/or reactive waste streams are stored;
- A minimum of two feet of aisle space must be maintained at each waste storage area; and
- Waste codes and a start date (with day, month, and year) are required on each hazardous waste label.

2. SQG Locations

UNH manages two Small Quantity Generator sites. They are the Jackson Estuarine Laboratory and the UNH Manchester Campus.

3. SQG Extended Quantity and Storage Provision

SQGs may accumulate up to 1,000 kilograms or 2,200 pounds of non-acutely hazardous waste on site for an indefinite length of time without a permit provided they comply with the following additional requirements:

- Hazardous waste containers are managed appropriately and inspected weekly. Criteria for inspection of SQG Extended Quantity Storage areas will follow those outlined in [Appendix A](#) for CAA inspection;
- Hazardous waste containers are under the control of a designated hazardous waste manager/emergency coordinator or designee;
- An emergency coordinator is designated and available to take the responsibility for coordinating all emergency response measures at all times;
- The generator posts the name and telephone number of the emergency coordinator, emergency telephone numbers, and the location of emergency equipment next to the telephone nearest each hazardous waste storage area;
- The generator ensures that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies;
- Generators must comply with 40 CFR Part 265 Subpart C Preparedness and Prevention;
- A registered transporter ships hazardous waste off-site to an authorized facility within 90 days of the date that the 1000 kg limit is reached.

IX. Waste Packaging

Proper packaging of hazardous waste is necessary to ensure safe transportation from point of origin to ultimate disposal. The selection of appropriate containers helps prevent leaks and spills that may result in human exposure or environmental release during material handling, storage and transport. Routine handling occurs on the campus, in transit to the disposal facility or during the disposal process. The selection of appropriate containers is only to be completed by the Coordinator of Hazardous Waste or the Hazardous Waste Specialist.

OEHS provides for the distribution of proper hazardous waste containers. Determination of waste container type is based primarily on the chemical characteristics of the waste contained, waste generation rate, SAA considerations and disposal method.

X. Labeling

To ensure that required information concerning the contents and hazards of the container are documented and communicated, waste containers must be properly labeled. Labeling requirements are based on the intended disposition of the container; whether it will be stored on-site in a SAA, in the CAA or shipped off site for ultimate disposal at a TSDRF. The labeling requirements for waste stored on site are found below.

A. SAA Locations

The following label information must appear on all containers located in SAAs:

- The words “Hazardous Waste;”
- Words that identify the contents of the container (No symbols or abbreviations).
- A copy of UNH’s SAA Label is shown in [Appendix C](#).

B. CAA Locations

The following label information must appear on all containers stored in the CAA:

- The words “Hazardous Waste;”
- Words that identify the contents of the container (No symbols or abbreviations).
- USEPA and/or NHDES hazardous waste codes; and
- Date waste began accumulating in the container.

For waste coming from a SAA, the accumulation start date for 90-day storage is the date that the container is removed from the SAA and placed in the CAA.

C. Small Quantity Generators (SQGs)

SQGs have the same labeling requirements as a CAA.

XI. Transportation and Disposal Management

A. Introduction

Transport of hazardous waste is the process used to move waste containers between the following locations:

- SAA locations and the CAA;
- CAA and the off-site TSDRF;
- SQG locations and the off-site TSDRF; and
- SQG locations and the Durham Campus FQG CAA.

The disposal process involves the following items and is discussed below.

- Scheduling waste pickup and relocation from the SAA to the CAA;
- Scheduling waste pickup from the CAA and shipment to the TSDRF;
- Evaluation of the waste transporter and TSDRF;
- Completion and maintenance of paperwork and records; and
- Management of certificates of disposal/destruction obtained.

B. SAA

Once waste containers stored in the SAA are full or are no longer needed they must be relocated to the CAA. Contact the Coordinator of Hazardous Waste or Hazardous Waste Specialist to schedule a pick-up of the filled container(s).

C. CAA

During weekly inspection, the Hazardous Waste Coordinator or Hazardous Waste Specialist evaluates the status and amount of containers stored in the CAA. The Coordinator of Hazardous Waste or the Hazardous Waste Specialist will arrange for a waste pick-up by a Licensed Hazardous Waste Transporter if any of the following conditions are met:

- There are a sufficient number of containers in the CAA for economic disposal of the waste;
- Containers are approaching the 90 day storage limit; or
- The CAA area is approaching capacity.

D. Small Quantity Generator

Waste generated at the Jackson Estuarine Laboratory and the UNH Manchester Campus of the University will have a waste pick-up arranged by the Coordinator of Hazardous Waste or the Hazardous Waste Specialist when the SQG is approaching storage capacity and/or there are sufficient numbers of containers for economic disposal of the waste.

As an alternative, authorized by Env-Wm 501.02 (c), hazardous waste may be self transported by OEHS staff members to the Durham CAA. The Coordinator of Hazardous Waste will determine the best method of transport for ultimate disposal.

E. Off-Site Disposal

Once hazardous waste stored in the CAA on the Durham Campus or one of the University SQGs has been scheduled for off-site transportation, the waste pick-up will be completed within approximately two (2) weeks of notification.

F. Disposal Facility

UNH OEHS has evaluated and approved each TSDRF. Reports manifest documents, and land disposal restriction forms will be completed, and signed by either the Coordinator of Hazardous Waste, the Hazardous Waste Specialist, or other authorized OEHS staff members.

G. Disposal Transportation, Reporting and Recordkeeping

UNH approves and utilizes numerous permitted Hazardous Waste Transporters to transport shipments of waste to a permitted TSDRF. UNH has determined that each transporter possesses a valid NH hazardous waste transporter permit and a valid USEPA Identification Number. UNH will also assure that each vehicle transporting University generated waste is placarded with appropriate warnings in compliance with rules adopted by the New Hampshire Department of Safety and the US Department of Transportation.

XII. Waste Minimization

In support of the University's ongoing efforts to minimize costs, control liability, and maintain a sound environmental program, every effort will be made by UNH to minimize the generation of hazardous waste. To accomplish this objective, UNH has developed a Waste Minimization Strategy designed to identify and develop opportunities to control chemical use and reduce waste generation. Various methods have been identified and implemented. These include such actions as:

- **Purchasing Control:** Review of chemical purchases to ensure that appropriate materials and quantities are purchased. This helps to prevent purchasing too much of a material or material of the wrong type that could become a regulated waste.

- **Periodic Inventory Evaluation:** Evaluation of laboratory reagents for current use, transfer to virtual stockroom or disposal.
- **Surplus List:** An online system to match on-campus chemicals with university researchers to avoid the disposal of useful materials.
- **Environmental Management System:** The Solid Waste and Environmental Management Plan (SWEMP) is expected to reduce the volume of the solid waste stream, reduce the toxicity of the solid waste stream, increase re-use and recycling efforts, and promote pollution prevention at the University.

As new strategies are identified, evaluated and implemented, this section will be updated to reflect methods currently available and in use. Contact the OEHS Director or the Hazardous Waste Coordinator to provide ideas or obtain information on waste minimization strategies.

XIII. Training

A. Introduction

Appropriate training is provided to ensure that individuals involved in hazardous waste generation and disposal understand regulatory requirements and methods to minimize hazards and risks associated with the management of hazardous waste. This training may include instruction in USEPA, NHDES, OSHA and USDOT requirements.

All individuals disposing, handling, manipulating, storing, labeling, etc. hazardous wastes must receive the UNH Hazardous Waste Management Training before working with these materials and then every three years.

B. Training Requirements – General

As both a small and full quantity generator of hazardous waste, UNH is required to provide various training programs to ensure that hazardous waste is effectively and safely managed. UNH conducts or makes available training programs to comply with the appropriate aspects of the following regulations:

- USEPA’s Resource Conservation and Recovery Act (RCRA)
- United States Department of Transportation (USDOT) Hazardous Material Transportation Act (HMTA) HM 181/126 F
- New Hampshire Department of Labor / USDOL/OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER), 29 CFR1910.120

C. Hazardous Waste Training – Resource Conservation and Recovery Act (RCRA)

1. Introduction

The USEPA and NHDES hazardous waste regulations state that employees who handle hazardous waste must be familiar with proper waste handling and emergency procedures (including contingency plan implementation) relevant to their responsibilities. See 40 CFR 265.16 and Env-Wm 509.02(a)(2). As part of the UNH Hazardous Waste Management Plan, individuals involved with handling hazardous waste will receive appropriate training to ensure compliance with RCRA requirements. Individuals with the following responsibilities will be included in the RCRA training program:

- Art Technicians
- Chemists
- Engineering Technicians
- The Coordinator of Hazardous Waste

- Hazardous Waste Specialists
- Facilities Maintenance Coordinators
- Heating Plant Maintenance Mechanics
- HVAC Technicians
- Laboratory Technicians
- Medical Laboratory Technicians
- Research Associates
- Research Scientists
- Research Technician
- Maintenance Supervisors;
- Select Graduate/Undergrad Students
- Select Faculty

Written job descriptions for the above job titles are located on the UNH Human Resources website and can be viewed by following these links:

<http://www.unh.edu/hr/job-specs/job-specs-pat.htm> (PAT descriptions)

<http://www.unh.edu/hr/job-specs/job-specs-os.htm> (OS descriptions)

In addition, other individuals who may benefit from this training will also receive appropriate training.

The Coordinator of Hazardous Waste will direct the training program. Currently, for training SAA waste handlers, UNH utilizes Blackboard™, a software training system that includes delivery of the course content, a quiz on the content and a system for tracking participants of the training. As an alternative, classroom instruction, provided in-house or by an outside contractor, and/or on the job training may be provided.

Personnel must successfully complete the training program within six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees who have not received this training must not work in unsupervised positions until they have completed the training requirements of this section.

2. RCRA Training Program Content

a. Full Quantity Generators/Small Quantity Generators

In January of 2003, the NHDES implemented the Hazardous Waste Coordinator (HWC) certification program. NHDES requires that every FQG in New Hampshire have staffed at least one person certified as a HWC. The certification meets the training requirements in ENV WM 508.02 (a)(2). Recertification is required annually. Training will cover the following topics:

- Hazardous Waste Determinations
- Classification
- Storage
- Inspection and Training
- Reporting and Information
- Contingency Plans/Preparedness and Prevention
- Hazardous Waste Permits
- Used Oil
- Universal Waste

SQGs do not require any formal training. Training received for certification as a Hazardous Waste Coordinator is sufficient to ensure that OEHS personnel are aware of SQG hazardous waste management requirements.

b. SAA Locations

Training will include elements of hazardous chemical management with details on purchasing, use, storage and disposal of waste. Additionally, UNH will train SAA employees in procedures for responding to emergency situations. Emergency response training will familiarize personnel with emergency procedures, emergency equipment, and emergency systems, as applicable. Employees who handle hazardous waste in SAAs must receive a review of the initial training every three years.

3. RCRA Training Records

Training records are retained for a **minimum of three (3) years** after an employee leaves the position. (40 CFR 265.16(e)) These records include:

- The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
- A written job description for each job title. This description must include the requisite skill, education, and/or other qualifications, and the duties of the personnel assigned to each position.
- A written description for the type and amount of both introductory and continuing training that will be given to each person filling a position.
- Records that document that the training or job experience has been given to and completed by the facility personnel.

D. US Department of Transportation

The US Department of Transportation requires that any individual offering hazardous materials for shipment must receive instruction to permit them to comply with USDOT regulations. USDOT's training requirements (49 CFR 172, Subpart 4) apply to individuals involved with hazardous materials transportation processes, as defined by the USDOT. (The definition includes hazardous waste.) This training is required for those individuals responsible for pre-transportation packaging, loading, transporting, unloading, paperwork completion, etc. of hazardous waste and hazardous materials.

UNH has identified those involved with transportation of hazardous materials and has trained each in their specific job function. For the purpose of hazardous waste management at UNH, any individual who packages waste for disposal (from the CAA), selects containers or prepares a manifest will receive USDOT Training.

USDOT also requires that certain shippers/carriers of hazardous materials develop security plans that address the security measures to be taken when storing hazardous waste prior to shipment. The University has developed a security plan that meets the USDOT requirements. This plan is available for viewing only by authorized individuals, and regulatory agencies.

1. USEPA Regulations Overlap

USEPA's RCRA defines a hazardous waste transporter as any person engaged in the off-site movement of hazardous waste by air, railway, highway, or water (40 CFR 260.10). Therefore, hazardous waste transporters must follow both USEPA and USDOT regulations. While USEPA regulations focus on hazardous waste and the manifest system, USDOT regulations and training govern how hazardous materials are packaged, marked, and labeled in the transportation process and emergency response procedures during transportation.

E. New Hampshire Department of Labor

New Hampshire Department of Labor is the regulatory agency responsible for development of health and safety standards to safeguard State employees. Many of their standards apply to the management of hazardous waste. UNH has formed a Joint Loss Management Committee that is responsible for developing programs and training to protect the health and safety of University employees. These health, safety, and training requirement and programs are available through OEHS.

F. OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER)

HAZWOPER (29 CFR 1910.120) training is required for employees who work at uncontrolled hazardous waste sites, who work at TSDRF's, or who provide emergency response for releases of hazardous substances. HAZWOPER training is required for University hazardous waste personnel. Additionally, HAZWOPER training may be required for students, staff, and faculty who may conduct research at offsite locations, such as a Superfund site.

HAZWOPER training will include elements of an emergency response plan, standard operating procedures for the particular site/job, personal protective equipment, and procedures for handling emergency incidents. Initial training requires 24 hours; refresher training requires 8 hours.

XIV. Recordkeeping and Reporting

A. Introduction

Hazardous waste generators are required to create, provide and maintain records that track waste from generation to ultimate disposal. The purpose of obtaining, maintaining and preserving these documents is to ensure that waste is properly managed and regulatory compliance requirements are met. The information and documentation is also useful in determining and potentially avoiding liability if the waste becomes involved in Superfund action through the transporter or disposal facility. Contrary to minimum regulatory requirements, maintaining the required record keeping and documentation permanently, is a prudent management practice.

Both USEPA and NHDES specify record keeping requirements. Their requirements include:

- USEPA requires generators of hazardous waste to comply with the record keeping and reporting requirements set forth in 40 CFR 262.40 and 268.7(a)(8).
- NHDES requires that generators of hazardous waste comply with record keeping and reporting requirements specified in Env-Wm 510, Manifest Requirements and Env-Wm 512 Record keeping and Reporting Requirements.
- Additionally, 40 CFR 265.174 and Env-Wm 509 require that CAAs be inspected weekly. Under Env-Wm 509, SAAs must be inspected monthly if more than 10 gallons of hazardous waste has accumulated in the SAA. The generator must be able to demonstrate to the USEPA or State that they have inspected and maintained these areas in compliance with RCRA regulations by documenting their inspection activities.

The following sections outline how UNH meets the reporting requirements as well as how records are organized and maintained.

B. Records Administration and Storage

The Coordinator of Hazardous Waste in OEHS maintains the required records and profiles. The record keeping system is organized in the following manner:

- The individuals authorized by the University to **sign manifests** will sign the manifest(s) prior to shipment, transferring the waste to the transporter;

- The Coordinator of Hazardous Waste or Hazardous Waste Specialist will **distribute signed manifests** to the appropriate agencies following information outlined in [Section XIV.C.1](#);
- Manifests, Land Disposal Restrictions, and Packing lists are organized chronologically;
- Manifest documents are reviewed within 30 days from manifested shipments to ensure receipt of disposal facility copies of the manifests. UNH policy is to not pay invoices for hazardous waste shipments until return copies of manifests are received;
- Quarterly, Annual, and Biennial Hazardous Waste Activities Reports are organized chronologically; and
- Waste profiles are organized by designated facility and waste profile number.

C. Records

1. Hazardous Waste Manifests

When a hazardous waste manifest is used, an authorized University Representative will sign it by hand and maintain a copy for the University's records. The individuals authorized by UNH to sign manifests are the Coordinator of Hazardous Waste and the Hazardous Waste Specialist.

A manifest from the Destination State, the location where the waste will ultimately reside, is used for each hazardous waste shipment. If that state does not require its use, then the New Hampshire State manifest will be used.

Once the shipment has left the Campus, the University must mail a copy of each manifest to the destination and generation state's environmental agency within five (5) days. The University must receive a signed copy from the receiving TSDRF within 45 days from the date the (initial) transporter received the waste. If after 30 days the University has not received the signed TSDRF copy, they will contact the TSDRF to determine the status of the shipment. If the signed copy is not received within 45 days, the University must submit an [Exception Report](#) to NHDES. See [Section XIV.C.3](#) Exception Reports below.

UNH must keep manifest copies for three (3) years from the date the waste was accepted by the initial transporter. Manifests should be kept with the applicable [Land Disposal Notification/Certification](#) forms.

Manifest Distribution Procedure

The following is the Manifest Distribution Procedure. The manifest must be distributed as indicated below. The Coordinator of Hazardous Waste will ensure that UNH obtains and provides the manifest copies as indicated. Distribution of Copies 1 and 2 by the TSDRF is state specific and therefore will vary. Please see the TSDRF state's manifest for distribution information.

Manifest copies will be distributed as follows:

- **Copy 1:** TSDRF mails to destination state environmental agency.
- **Copy 2:** TSDRF mails to generator state environmental agency.
- **Copy 3:** TSDRF mails to generator within 14 days of receipt. (See [Exception Reports](#), below if this copy is not received within 45 days of Transporter Pick-up.)
- **Copy 4:** TSDRF retains.
- **Copy 5:** Transporter retains.
- **Copy 6:** Generator mails to destination state agency within 5 days of pick-up.
- **Copy 7:** Generator mails to generator state agency within 5 days of pick-up.
- **Copy 8:** Generator retains for records after pick-up.

In some instances, the destination state does not want to receive a copy of the manifest from the generator (Copy 6). In these cases, Copy 6 will be retained with Copy 8.

Record Retention

Hazardous Waste Manifests must be kept for three years from the signature date of the report. A prudent management practice is to maintain the manifest permanently but separately for manifests older than the prior three years.

2. Land Disposal Notification/Certifications

Each waste stream must have a one time written notice/certification sent to each treatment, storage, disposal or recycling facility with the initial shipment of that waste stream, indicating whether the waste does or does not meet the requirements of 40 CFR 268.40 or 268.45. These forms are kept with the signed manifest copy.

Record Retention of LDRs

Land Disposal Notifications must be kept for three years from the date of the report. These reports should be kept with the manifest copies.

3. Exception Reports

UNH will contact the TSDRF to determine the status of the waste if a signed copy of the manifest is not received within 30 days.

UNH will submit an exception report to the NHDES and USEPA if a signed copy of the manifest is not received from the receiving (TSDRF) facility within 45 days from the date the waste was accepted by the initial transporter. The exception report consists of the following:

- A legible copy of the manifest for which the generator does not have confirmed delivery.
- A letter indicating that the University hasn't received the TSDRF facility's signed manifest, and
- A cover letter, signed by the generator explaining the efforts taken to locate the hazardous waste and the results of those efforts.

Record Retention of Exception Reports

Exception Reports must be kept for three years from the due date of the report. These reports should be kept with a copy of the manifest in question.

4. Profiles/Waste Analyses Results

Each waste stream must be evaluated to determine if it is a hazardous waste as defined by 40 CFR 261 and Env-Wm 502 and to determine the proper waste code. This can be done by either testing the waste according to the methods set forth in Env-Wm 401.04 and Env-Wm 403 or by applying generator knowledge of the hazardous nature or characteristics of the waste based on the materials and process(s) used to generate the waste. The waste code is determined by understanding how the waste is generated. A waste analysis form or waste profile (developed by the disposal facility) is used to document the hazardous waste determination.

Profile/Waste Analysis Results Record Retention

Test results, waste analyses, profiles, or other determinations must be kept for at least three years from the date that the waste was last sent to a TSDRF. These records should be kept separate from the Land Disposal Notification/Certifications and Manifests.

5. SAA and CAA Inspections

USEPA and the NHDES require UNH to inspect their CAA weekly and certain SAAs monthly (if the accumulation is equal to or greater than 10 gallons). The regulations make no specific reference to required information or documentation. However, USEPA inspectors have made it clear that they expect proof that the generator is complying with this requirement. See [Appendix A](#) and [Appendix B](#) for copies of the inspection forms used by UNH.

Satellite and CAA Inspection Forms Record Retention

SAA inspection forms are submitted and stored on CEMS, the UNH Chemical Environmental Management System, for a period of at least three years. The Coordinator of Hazardous Waste will maintain the CAA inspection forms in the EHS office for a period of at least three years.

D. Reporting

Hazardous waste regulations require that four (4) reports must be submitted on a periodic basis. The Reporting requirements include:

- Quarterly Reports
- Biennial Reports (USEPA Requirement)
- Exception Reports
- Small Quantity Generator Self Certifications

1. Quarterly Reports

Any generator who generates, in a three month period, 300 kg (661.5 lbs.) or more of hazardous waste that is not exempted from reporting must submit a quarterly activities report. Submittal of the quarterly activities report also requires a fee be paid to the hazardous waste cleanup fund, unless exempted. The report must be submitted to the NHDES for each calendar quarter that the 300 kg threshold is exceeded. A copy of the form is mailed to UNH by the NHDES. If it is not received within 45 days of the end of the previous quarter, contact the NHDES. The report and the appropriate fee must be sent to the NHDES within 30 days of receiving the report.

2. Quarterly Reports Record Retention

The quarterly activities report must be maintained for a minimum of three years from the due date of the report. These reports are kept separate from other reports in OEHS.

3. Annual Reports

August 2000 changes in the NHDES requirements for the Annual Activities reporting requirements resulted in the deletion of this report. However, prior to August 2000, UNH was required to submit and maintain this report to meet the record retention requirements.

Submittal of an annual activity report summarizing the University's hazardous waste activities during the calendar year (January 1 through December 31) was previously required by the NHDES for each University location that generated over 100 kg (220 lbs) of hazardous waste or over 1 kg of acutely hazardous waste in a single month during a calendar year. The report was mailed to UNH by the NHDES and was completed by UNH and returned to the NHDES by April 1 of each year.

Annual Reports Record Retention

Historic Annual Activities reports must be maintained for a **minimum of three years** from the due date of the report. These reports are kept separate from other reports in OEHS.

4. Biennial Reports

Biennial reports, required by the USEPA for all Large (Full) Quantity Generators were historically developed from Annual Activities Reports submitted by UNH to NHDES. Since the August 2000 changes, the NHDES uses Quarterly Activity reporting information for development of the USEPA required Biennial Report.

Biennial Report Record Retention

Since the NHDES historically generated and provided this information to the USEPA from data developed from Annual Reports and currently generates this information using Quarterly Activities Reports, no reports are actually submitted by UNH. Therefore, no records must be kept.

5. Exception Reports

Exception Reports must be kept for **three years** from the due date of the report. These reports should be kept with a copy of the manifest in question.

6. Small Quantity Generator Hazardous Waste Self-Certification

In July of 2003, the NHDES implemented the Small Quantity Generator Self-Certification Program. This program requires SQGs to perform an inspection of their facility once every three years and determine whether it is in compliance with the small quantity generator hazardous waste regulations. SQGs must review their hazardous waste management procedures, conduct a self-inspection, and provide NHDES with a self-certification declaration that the facility is in compliance with applicable regulations.

If it is determined that the facility is not in compliance via self-inspection, the SQG must develop a Corrective Action Plan that specifies how the facility plans to come into compliance, as well as a timetable for compliance.

The Jackson Estuarine Laboratory was inspected and self-certified in December of 2006. The UNH Manchester campus was inspected and self-certified in December of 2004.

SQG Hazardous Waste Self-Certification Record Retention

Copies of the self-certification reports submitted to NHDES will be kept on file at the SQG location, as well as at OEHS.

XV. Emergency Preparedness and Response / Contingency Plan

A. Introduction

Risks associated with the handling of hazardous chemicals include spills, leaks, releases, etc. and are referred to as events. The Hazardous Waste Management Plan is designed to institute methods to prevent hazardous material events. This section outlines the steps to take to ensure that events are effectively and expeditiously managed and risks are controlled. UNH has developed and implemented an [Emergency Procedures Program](#) and an [Integrated Contingency Plan](#). These provide information on the actions University personnel will take to minimize hazards to human health and the environment from releases of hazardous waste and identify actions and designate personnel who will respond to emergencies including hazardous material spills. Trained and specially equipped response

personnel are available on the campus or are on-call 24 hours per day and can be contacted through the Director of Environmental Health and Safety at 862-4041. A list of emergency contacts and phone numbers is contained in [Appendix D](#).

B. Emergency Coordinators

In case of a catastrophic emergency or the need to evacuate, University Fire/Police dispatch must be called. They can be reached by dialing **911**. There is no need to dial “9” from an outside line. Simply dial 911 from any campus phone. Outdoor Emergency Phones communicate directly with UNH Dispatch.

The Director of Environmental Health and Safety or his designee serves as the overall **Disaster/Emergency Coordinator** for all responses to emergency situations.

The Hazardous Waste Coordinator, Radiological Safety Officer, or their designees, serve as the secondary Emergency Coordinator for all actions related to the specific hazardous materials or radiological emergency situations. Contact information for the Emergency Coordinators and other emergency services can be found in [Appendix D](#).

The Emergency Coordinator is responsible for the following:

- Being on the premises or on call at all times (or designee);
- Being available to respond to an emergency by reaching the site of generation or accumulation within a short period of time;
- Developing or coordinating the emergency response plans, site operations and activities;
- Being familiar with location and characteristics of waste handled by the University, location of records, and layout of waste generation sites; and
- Having the authority to commit resources to hazardous waste cleanup and response.

C. Emergency Equipment

UNH provides the following equipment to control emergencies at or near the CAA:

- A communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;
- A device, such as a telephone (immediately available) or a cellular telephone, capable of summoning emergency assistance from the police departments, fire departments, or state or local emergency response teams;
- Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and
- Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

UNH has available the listed materials and trains appropriate personnel on the use of the equipment.

D. Posted Emergency Action Information

The following information is posted at the nearest telephone to the CAA:

- Emergency action steps; and
- Emergency phone numbers for:
 - Emergency coordinator(s) (home and office)
 - Support services (e.g., fire, police, hospital, State of New Hampshire)

- Fire extinguisher location;
- Spill control materials location; and
- Fire and internal emergency alarm locations (if present.)

E. Emergency Procedures

Specific emergency procedures can be found in the [Emergency Procedures Program](#) and the [Integrated Contingency Plan](#). These plans describe the actions University personnel will take to minimize hazards to human health and the environment from fires, explosions, or unplanned releases of hazardous waste, and how they will respond to these events. Specific emergency procedures for the CAA can be found in the [Central Hazardous Waste Accumulation Area: Preparedness, Prevention, and Contingency Planning](#) document.

F. Notification and Reporting

1. Notification

In the event UNH activates any emergency measures related to hazardous waste the following action will be taken:

- UNH will notify the USEPA Regional Administrator, and appropriate State and local authorities, that the facility has taken the following action before operations are resumed in the affected area of the facility:
 1. That no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
 2. All emergency equipment listed in the contingency plan is cleaned and ready for use before operations are resumed.
- UNH will record the time, date, and details of any incident that requires implementing the contingency plan.

2. Reporting

UNH will submit a written report of the incident to the Regional Administrator within 15 days after the incident. The report will include the following information:

- UNH's name, address, and telephone number;
- The date, time, and type of incident (e.g., fire, explosion);
- The name and quantity of material(s) involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

Appendix A: CAA Inspection Form

1. Is each drum or container:	Answer each question yes or no (y/n)
Closed	
In good condition, non leaking	
Labeled and DOT marked	
Dated	
Logged	
2. Are the following available:	
Open head drums/closed head drums	
Spill response equipment, overpack drum	
Hazardous waste drum and accumulation labels	
DOT hazard class/division labels	
3. Are accumulation drums logged?	
4. Are lights and exhaust fans working properly?	
5. Unrestricted access to outside doors?	
6. Unrestricted access to fire extinguisher?	
7. Unrestricted access to alarm and telephone?	
8. Unrestricted access to shower and eyewash?	
9. Any obvious problems with drench shower?	
10. Containers stored to prevent release?	
11. Is incompatible waste segregated?	
12. For outside storage	
Is containment pad drain closed?	
Are drums covered?	
13. Obvious signs of unauthorized access:	
At the roll gate entrances?	
At storage modules/receiving building?	
14. Is the fence in good condition?	
15. Any objects in fenced area that indicate or could cause a security breach?	
16. Authorized individuals in possession of key?	
Inspector's initials:	
Date:	
Time:	

Comments:

Appendix B: SAA Inspection Form

Example Record in UNHCEMSTTM (questions in **RED** are required and must be answered)

<http://www.cems.sr.unh.edu/>

1. **Do you have 10 gallons or more of hazardous waste? If YES, complete the remaining questions. If NO, then you may stop at this question and submit the report.**
2. Is container in good shape (non-leaking, and closed)?
3. Is container compatible with the waste stored in it (i.e. glass for acids)?
4. Are incompatible materials segregated (i.e. separate containers and separated by distance or a barrier)?
5. Is the hazardous waste label clearly visible and legible?
6. Is the description clearly marked with chemical names (no abbreviations or chemical formulas allowed)?
7. Are there full containers of waste, or containers of waste that are no longer needed? If yes, the filled date should be filled in.
8. Have arrangements been made to have full waste containers or containers that are no longer needed picked up? Requests to have waste picked up can be made by contacting the Coordinator of Hazardous Waste at 862-3526 or by submitting the request through UNHCEMSTTM.
9. Is liquid waste stored on an impervious base?
10. Are there functional floor drains/sinks present near where liquid waste is stored?
11. For liquid waste storage: If there are functional floor drains/sinks present or if waste is not stored on an impervious surface, is secondary containment present?
12. Please enter any additional comments:

Comments:

Appendix C: SAA Label

FRONT:

Environmental Health and Safety • Perpetuity Hall • UNH • Durham, NH
Telephone (603) 862-3526 • 862-0683 • 862-4041

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

Description: _____

Start Date: _____ Filled Date: _____

To comply with EPA law, EH&S must receive this container **immediately** after it is filled. Call 2-3526 for hazardous waste removal.

Generator: _____

Dept: _____ Bldg: _____ Room: _____

For EH&S Use Only

Log #: (EH&S)	EPA Hazardous Waste Code:	Weight: (kg)
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BACK:

Directions for Labeling Hazardous Waste

A container holding **ANY** quantity of Hazardous Waste **MUST** be labeled **IMMEDIATELY**.

Description – All waste constituents and concentrations based on the generators knowledge of the waste. No abbreviations. No formulas. Example – Acetonitrile 60%, Hexanesulfonic Acid 30%, Water 10%

Start Date – M/D/Y-Dated immediately upon adding the first quantity of waste to a container.

Filled Date – M/D/Y-Date immediately when the container is full **OR** no longer needed. After assigning a filled date, contact EH&S for container pickup.

Generator – Name of Principal Investigator **AND** name of person actually producing the waste. (Example – A. Smith/B. Jones)

Dept. – UNH Academic, Research or Support Dept.

Bldg. – UNH Building name

Room – Room number where the waste container is stored.

Log#, EPA Hazardous Waste Code and Weight are for EH&S use.
Please call EH&S at 2-3526 with any questions regarding Hazardous Waste Management.

Appendix D: Emergency Response Notification Contact List

Emergency Contacts	
Police, Ambulance, Fire, Hazardous Spills	911
Office of Environmental Health & Safety*	
Coordinator of Hazardous Waste	603-862-3526
Hazardous Waste Specialist	603-862-0683
Radiological Safety Officer	603-862-3607
OSHA Violations	603-862-4761
Health Department Requirements	603-862-4041
* UNH dispatch maintains a list of home phone numbers	
Facilities Maintenance	
Facilities Support Center	603-862-1437
Daytime Custodial	603-862-2656
Other Emergency Notifications Telephone Numbers	
Wentworth Douglas Hospital	603-742-5252
Portsmouth Regional Hospital	603-436-5100
Durham Ambulance Corps (<i>Emergency Medical Services</i>)	911
Durham Fire Department	911 or 862-1426
Clean Harbors (<i>Hazardous Materials Responder</i>)	(603) 224-6626 (business hours) (800) 645-8265 (off hours)
New Hampshire Department of Environmental Services	603-271-3899
US Environmental Protection Agency, Region 1	888-372-7341
State Police	(603) 271-3636