

ADDENDUM

1. Section 9.3 does not make the provisions of §4415.16 concerning incompatibles clear.

Section 4415.16 of the DCMR states that storage containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, or open tanks will be separated from the other materials or protected from them by means of a dike, berm, wall or other device. Separate hazardous waste containers that store wastes which may be incompatible. Place compatible liquid waste containers in secondary containment bins. Compatible waste containers of non liquids can be placed on a counter that is away from a sink or in secondary containment bins. Depending on the quantity and types of hazardous waste produced, several different secondary containment bins can be provided for use. Secondary containment bins ensure that in case of a spill, the hazardous waste is contained and does not mix with incompatible materials. Contact EHS to obtain secondary containment bins.

2. Section 12.0 does not make it clear that training is required within six months of employment or that written descriptions of the type and amount of training is maintained pursuant to §§4405.4 and 4405.6(c) respectively.

Newly appointed CHOs will receive initial hazardous waste management training within six (6) months of the date of their appointment to the position. Thereafter, every CHO will receive annual training in the hazardous waste management practices applicable to our University. EHS will provide classroom training for CHOs. EHS trainers will receive annual hazardous waste training from an independent firm. Generators and/or handlers of hazardous waste will receive hazard communication training based on either 29 CFR 1910.1200 or 29 CFR 1910.1450 depending on their work practices. Hazard communication training will include an introduction to the HWMP.

Hazardous waste management training will include, at a minimum, emergency procedures, emergency equipment, emergency systems and a review of the regulatory requirements set forth by the EPA, DOT and OSHA. The training will focus on the details of the HWMP as described in this document.

Following each training session, a quiz will be administered. The quiz is designed to review the most important concepts of hazardous waste management practices and provide feedback to the trainer. A 75 percent pass rate is required. Department chairs and supervisors will receive documentation of trainees who successfully complete the training and pass the quiz, issued from EHS.

EHS will maintain names, job titles and job descriptions for USI employees that receive the hazardous waste management training for three years from the date the employee last worked at the University (See Appendix 14 for a list of names and job title and Appendix 15 for job descriptions).

3. Appendix 3, Hazardous Waste Determinations & Classifications, flowcharts do not consistently identify RCRA defined Hazardous Wastes pursuant to §4100. For example, the RCRA definition of “Ignitable” is used, but called “Hazard Class: Flammable”. Similarly, asbestos is incorrectly identified as Hazardous Waste when it is a regulated material. Appendix 3, *Compressed Gas Cylinders & Aerosols Flowchart*, gives an incorrect definition of an empty compressed gas cylinder pursuant to §4104.4 (should state atmospheric pressure)

Change the term “Flammable” to “Ignitable” to conform to the RCRA definition.

Change the term “Hazardous” to “Regulated” for Asbestos.

Gas cylinders are categorized as empty when they have reached atmospheric pressure.