

Hazardous Waste Management

Introduction

The Resource Conservation and Recovery Act (RCRA) of 1976 and the 1984 amendments, Hazardous and Solid Waste Amendments, were designed to regulate the generation, transportation, treatment, storage, and disposal of hazardous substances. ECS requires all RCRA hazardous waste be managed in accordance with applicable Federal, State, and local regulations, while minimizing adverse impacts to the public and environment.

School Board Policy Hazardous Materials Board Policy and these procedures outline how ECS employees will manage hazardous waste. Employees who manage hazardous materials are strongly encouraged to read and become familiar with the requirements identified in the Hazardous Materials Board Policy. These procedures are written to achieve compliance with the Hazardous Materials Board Policy.

Scope

These procedures establish requirements and responsibilities for the management of hazardous waste in compliance with Federal, State, and local regulations.

Definitions

Disposal: Discharge, deposit, injection, dumping, spilling, leaking, or placing of any hazardous waste into or on any land or water so that such hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

Generator: Any person, whose act or process produces hazardous waste identified or listed in 40 CFR 261 or whose act first causes a hazardous waste to become subject to regulation.

Hazardous materials: As defined by (DOT) means any substance or material that is capable of posing an reasonable risk to health, safety, and property

Hazardous waste: As defined in section 1004(5) of RCRA (42 USCA 6903), a solid waste, or combination of wastes, that because of its quantity, concentration, or physical, chemical, or infectious characteristics, may (a) cause or significantly contribute to an increase in mortality or in serious irreversible, or incapacitating reversible illnesses; or (b) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. Characteristics of a hazardous waste include (1) ignitability, (2) corrosion, (3) reactivity, and (4) toxicity. Criteria for identification and listing of hazardous wastes are found in 40 CFR 261, Subpart B.

Storage area: Temporary waste storage areas in each building are under the responsibility of the Environmental Health and Safety Specialist and are used solely for the purpose of managing regulated waste and universal waste in accordance with applicable regulations.

Responsibilities

Director of Operations

The Director of Operations is responsible for ensuring compliance management of hazardous waste which includes:

- Serve as contact and provide comment resolution with regulatory agencies
- Coordinate and attend annual school inspections with Los Angeles County Health Department
- Provide ECS personnel with environmental and waste management training
- Develop and maintain hazardous waste policies and procedures
- Review and approve "Hazardous Material Order Forms" prior to purchase
- Manage recycling of hazardous materials, identification of pollution prevention goals and disposal alternatives
- Identify, manage, and maintain waste storage areas
- Create and maintain up-to-date waste chemical inventories
- Perform quality control checks-and in-house inspections of employee work areas
- Coordinate, document and manage waste shipments and disposal alternatives
- Coordinate hazardous materials emergency response actions
- Maintain applicable training and certifications
- Manage transport and disposal of hazardous waste to the Mesa County Household Hazardous Waste Facility

Maintenance Staff (School Safety Liaison)

All ECS middle and high schools must designate a School Safety Liaison. According to the Hazardous Materials Board Policy, Maintenance staffs are responsible for the following activities:
Complete annual "Hazardous Waste and Classroom Safety Training"

- Attend after school Safety Liaison meetings
- Disseminate information from Director of Operations to affect staff within their building
- Assist Los Angeles County Health Department personnel during annual inspections
- Maintain and update science department Chemical Inventory
- Review hazardous material purchases by teachers in their school in cooperation with guidance from Director of Operations
- Use the ECS's "Work Order" system to initiate waste collection by Director of Operations Coordinate chemical emergencies with EH&SS and local emergency response authorities

Teachers: Science, Art, Technology Education, Horticulture, Science and Theater & Stage

Teachers handling hazardous materials are required to:

- Complete job specific hazardous waste training annually
- Annually update their classroom chemical inventory with Director of Operations

- Ensure all hazardous chemicals are lock and secured from students when not in use
- Review Material Safety Data Sheets (MSDS) prior to using hazardous materials in the classroom
- Cooperate with Los Angeles County Health Department personnel during annual inspections
- Contact Director of Operations to purchase new substances. Hazardous materials order form must be used for purchasing
- Use the ECS's "Work Order" system to initiate waste collection by Director of Operations
- Assist Director of Operations and local emergency responders during chemical emergency response

Below is a partial list of substances containing hazardous materials:

Science Classrooms

- Acids, Bases
- Heavy metals
- Biological specimen fluid
- Test kits
- Household products (bleach, 3% hydrogen peroxide)

Art, Technology Education Classrooms

- Adhesives
- Aerosol spray cans
- Batteries (household)
- Household products (bleach, detergents, disinfectants) Paints, lacquers, thinners and solvents
- Toner cartridges

Gardening and Greenhouse

- Fertilizers, Compost
- Water test kits

Maintenance Staff

Maintenance Staff are required to notify Director of Operations of upcoming projects that are likely to generate or require management of hazardous waste. Campus Engineer should refer to their chemical inventory with the MSDS to identify which materials are hazardous.

Maintenance Staff are required to:

- Attend job specific hazardous waste training sessions
- Review department chemical inventory with the MSDS maintained by foremen
- Place hazardous substances in designated waste collections storage areas when no longer needed
- Use the ECS's "Work Order" system to initiate waste collection by Director of Operations

Below is a partial list of substances containing hazardous materials:

Maintenance and Custodial:

- Aerosol spray cans fluids
- Cleaning fluids
- Fluorescent light tubes
- Lubricants
- Paints, lacquers, thinners, solvents
- Batteries
- Bleach
- Disinfectant
- Concentrates
- Fluorescent light tubes
- Floor sealer concentrates
- Floor stripper concentrates
- Inks
- Toner cartridges

Purchasing Hazardous Materials

Employees must complete a "Hazardous Materials Order Form" prior to purchasing any hazardous material. Forms are available on the main office. Employees may complete forms electronically or by hand, route internally for approval signatures and send to Director of Operations for approval. Director of Operations must sign and date each request form prior to purchase.

Science Laboratory Chemicals

Science teachers must contact the Director of Operations prior to purchasing chemicals. Each chemical must have an MSDS in the chemical inventory, if one is already on file there is no need to obtain a duplicate with each purchase. A copy of your chemical inventory must be kept in the school office. When chemicals are received, the date of purchase must be labeled on the container prior to adding it to the chemical inventory.

Art and Technology Education Materials

Art and Technology Education teachers must ensure that hazardous materials are included in their classroom chemical inventory. A copy of your chemical inventory must be kept in the school office. Some departments are using non-hazardous materials, where possible. Teachers may obtain surplus supplies from other schools if available. Director of Operations

Waste Management

Hazardous waste generators (custodial services, maintenance, grounds and transportation and teachers) are responsible for complying with this procedure, including:

- Refer to product MSDS regarding safe use of hazardous materials and use applicable personal protective equipment, if unsure consult EH&SS
- Keep hazardous materials stored and locked away from student contact when not in use
- Contact Director of Operations for disposal

Waste Storage Areas

Director of Operations will designate a waste storage area for each school. These locations will serve as waste collection points. Director of Operations will also establish waste storage areas at Administrative facilities. ECS employees must notify Director of Operations prior to placing materials in these areas.

Waste Disposal

Director of Operations will locate a legal disposal or recycling facility for all hazardous waste generated by ECS schools. Waste shipment records must be maintained in a file at each school and with Director of Operations. If necessary, Director of Operations will transport waste directly from ECS locations to the Los Angeles County Household Hazardous Waste Facility or facilitate contractor off-site shipments. No ECS employee is allowed to call for or coordinate hazardous waste disposal without prior approval from Director of Operations.

Aerosol Cans

Propellants in aerosol cans are by regulation considered hazardous materials. Even when cans are thought to be "empty" or unable to spray, the contents are still regulated as "universal waste". The residue and the propellant must be recaptured according to federal and state regulations. No unpunctured aerosol cans are to be discarded in the regular trash. Empty and unusable cans will be placed in a container labeled:

**Aerosol Cans Only
Universal Waste**

Schools

Employees must set aside empty or unusable aerosol cans for collect by Maintenance Staff. No empty or unused aerosol cans are allowed to go into trashcans. Maintenance Staff personnel will store aerosol cans in containers labeled "Aerosol Cans Only Universal Waste".

Maintenance Staff

Empty or unusable aerosol cans are placed in a container labeled "Aerosol Cans Only Universal Waste", located at the Grand Avenue Administration Facility-Paint Shop.

Fluorescent and Halogen-Gas Lights

When fluorescent or halogen gaslights burn out, they must be placed in their original packages. Maintenance personnel will collect and transport items to the designated storage area.

Maintenance Staff will collect these items as needed and recycle them at the Los Angeles County Household Hazardous Waste Facility or another qualified recycling facility.

Mercury-Containing Switches and Thermostats

Mercury- waste-containing switches from thermostats may be generated during heating and cooling system repairs. To manage mercury-waste-containing switches properly, maintenance personnel must do the following:

If mercury ampoules can be removed without breakage, remove and contact Director of Operations for storage and disposal. If ampoules cannot be removed without breakage; the entire unit will be considered a waste item.

If a mercury container is broken, immediately call Director of Operations at 424 456 5157. Do not touch the spilled mercury.

Paint Waste

Paint and solvent waste generated by painters will be collected in labeled containers and picked up as necessary, by a contracted disposal company. The Maintenance Staff will manage a file copy of waste disposal records.

Vehicle Waste

Vans used waste oil, anti-freeze, lubricants and un-used Freon refrigerant will be collected in labeled containers and picked up as necessary, by a contracted disposal company. The Maintenance Staff will manage a file copy of waste disposal records.

Toner Waste

Copy machines generate toner and toner cartri wastes. These wastes will be collected into a designated container and picked up as necessary by a maintenance staff. The Maintenance Staff will manage a file copy of waste disposal records.

Electronic Equipment and Computer Waste

Electronic equipment and computers may contain hazardous materials in the form of lead and zinc in monitors, keyboards, and CPU's. ECS has an existing contract with off-site contractor to recycle electronic equipment and computer waste. ECS personnel must not accept donated computer equipment without prior approval from Director of Operations. When electronic equipment or computers are designated for disposal, ECS personnel must contact the Director of Operations to arrange for waste transfer. The Director of Operations will coordinate and document the transport and recycling of these waste items. Maintenance staff will manage a file copy of "Waste Transfer/Disposal Form" records and Director of Operations will keep a copy of records.

Hazardous Materials Order Form

School: _____

Room:_____

Teacher: _____

Date:_____

Fill in as completely as possible. (BLUE shaded areas are to be completed by Director of Operations) Send completed via email to Quynh Tran: [mail to: quynh_tran@ecsonline.org](mailto:quynh_tran@ecsonline.org) after completion & routing.

Item	Quantity	Complete Item Description	*MSDS Needed Yes/NO	Supplier	Item #	Room # where item will be stored	Approved Y- Yes N -No

Approved By Director of Operations:_____

Date:_____