



## Critical Elements for Hazardous Materials Compliance

AU Faculty and Staff with responsibility for chemicals and other hazardous materials must ensure that they are stored and/or used in conformance with AU procedures and environmental regulatory requirements. The following addresses the most commonly identified compliance issues. Additional information and guidance is available on the RMS Environmental Management webpage at <http://www.auburn.edu/administration/rms/environmental.html>.

1. Management of Chemical Waste – All chemical wastes must be properly labeled with the identity of the contents and include the word WASTE (ie, Waste Acetone). Waste containers must be clean, appropriately sealed to prevent release of contents, and placed in a designated waste accumulation area. In addition to typical chemical wastes the following are also potential hazardous wastes requiring appropriate management:
  - a. Legacy Chemicals – Chemicals and chemical products which are abandoned, off-spec, outdated, or unwanted for any reason are inherently waste-like. The EPA would consider these to be solid wastes in which case the University is responsible for determining if they are hazardous wastes, and managing them appropriately.
  - b. Unlabeled/unknown chemicals – These materials include chemical residues and products in various containers including beakers and flasks. Materials in containers which are being used in an active process are not included in this category. As with Legacy Chemicals, unknowns are considered inherently waste-like and must be managed appropriately.
  - c. Waste Aerosol Cans – Spray cans containing product under pressure are hazardous material unless they are completely empty. If an aerosol can becomes unusable so that the product can not be removed by normal means or if the product is outdated, off spec or otherwise unusable/unwanted, the can should be disposed of through the RMS Waste Management program as a chemical waste.
2. Management of process waste containers – these include waste containers associated with X-ray and photographic film developers, high-performance liquid chromatography (HPLC) and atomic absorption equipment as well as any other equipment which discharge waste to a collection container. Containers used to collect these wastes must be labeled as described for chemical waste above. When the process is not in operation, the containers must be closed and placed in a designated waste accumulation area.

3. Management of used oil – containers of used oil must be labeled with the words “USED OIL”, in good condition, and closed at all times when not adding waste.
4. Universal Waste Management – these include batteries, mercury containing lamps (i.e. fluorescent, metal halide), mercury containing equipment and pesticides. Universal wastes are a special class of hazardous wastes which require proper management.
5. Biomedical Waste Management – Alabama law requires that biomedical waste be kept in sealed red containers identified with the biohazard symbol. In addition, sharps must be placed in a puncture resistant container (sharps container).
6. Chemical Storage – EPA regulations require that chemicals and chemical products be stored safely to minimize the risk of a release or damage to the environment. All chemical containers, including secondary containers, must be clearly labeled to identify the contents, be in sound physical condition and kept securely sealed. Chemicals should be stored in cabinets or on shelves, not on the floor or in walkways. Incompatible materials should always be physically separated during storage.

In addition, please use the attached forms to notify RMS if any of the following operations or activities is performed in your area:

1. Operations which discharge process wastes to drain or sink. These include photographic developing, acid/base neutralization tanks, oil/water separators, quench tanks, contact cooling water, etc. RMS will assist the operators with ensuring that their wastes are properly managed (use Process ID Form).
2. Operations which generate fine particulate waste. These include cutting, grinding and polishing operations such as machining metal, or processing geological specimens as well as sediment traps associated with ceramics. Depending upon the types of metals or minerals handled, waste from these processes could be hazardous waste. RMS will assist operators with ensuring that their wastes are properly managed (use Process ID Form).
3. Bulk oil, grease and petroleum product storage - Storage of these materials, in containers 50 gallons or larger, must be in accordance with the AU Spill Prevention Control and Countermeasure (SPCC) plan. RMS will provide compliance assistance to the operators (use Bulk Storage ID Form).

*Note that depending upon the type of activity performed and materials handled there may be additional regulatory requirements including documentation and recordkeeping.*

## PROCESS ID FORM:

Please identify each process which: (1) discharges liquid waste to a sink, drain or the environment including those discharging through a treatment system such as silver recovery units, etc.; (2) generates a solid particulate waste such as metal fabrication and machining, or mineral processing including wastes contained by an in-line sediment trap,

Department	Operator (name/phone)	Location (building/room)	Process Description

Return completed form to:

RMS Hazardous Materials Management  
971 Camp Auburn Road  
Fax: 334-844-4197  
e-mail: hazmat1@auburn.edu

## BULK STORAGE ID FORM:

Please use the following table to identify bulk (50 gallon or larger) containers and tanks used to store grease, oil or petroleum products.

Department	Operator (name/phone)	Location (building/room)	Container size	# of Containers	Product Stored

Return completed form to:

RMS Hazardous Materials Management  
971 Camp Auburn Road  
Fax: 334-844-4197  
e-mail: [hazmat1@auburn.edu](mailto:hazmat1@auburn.edu)