

To: Deans, Directors, Department Heads and Generators of Hazardous Chemical Waste

From: The Department of Occupational Health and Safety

Re: Changes in Hazardous Chemical Waste Management

In response to changing regulations from the Alabama Department of Environmental Management (ADEM), the Department of Occupational Health and Safety (OH&S) is required to modify our program for picking up hazardous waste and streamlining the method for Principal Investigators (PIs) and their staff to access required training on handling and storing hazardous chemical waste. Most of the current procedures for manifesting and picking-up chemical waste will remain unchanged. New regulations require that all persons serving as liaison to OH&S concerning chemical waste and surplus chemicals must be formally trained in proper handling, labeling, and manifesting hazardous waste for proper storage and disposal. This includes the PI and any responsible parties designated by the PI.

This is important because only individuals who have taken the required on-line training course are authorized to sign a Chemical Waste Manifest. Without that authorized signature, OH&S is not allowed to pick up the chemical waste. In addition, each laboratory producing chemical waste is now considered a Satellite Accumulation Area under EPA regulations. This means a specific area within each lab must be set aside for the temporary placement of surplus and waste chemicals and these areas are subject to certain State and Federal requirements that include random inspections by EPA, ADEM and UAB OH&S staff.

A PI may designate as many additional responsible parties as desired and individuals may be designated by more than one investigator. However, it is required that the Principal Investigator, as the generator of a hazardous waste, must also take the training in order to be authorized to dispose of chemical waste.

In order to be “authorized” the Principal Investigator and responsible parties from the laboratory must complete the UAB Hazardous Waste Management training. The deadline for completing the training is July 1, 2003, as required by ADEM and EPA. After that date only waste with a manifest signed by an authorized PI or their representative can be picked up for disposal.

The training will be on-line on the OH&S website [www.healthsafe.uab.edu](http://www.healthsafe.uab.edu) beginning May 30, 2003. Supplemental classes for those unable to take on-line training are scheduled for June 18, 2003 at 9:00 am in McCauley Conference Room, BBRB 263 and June 26, 2003 at 1:30 pm in BBRB 170. The training must be successfully completed and updated annually to maintain compliance with state and federal requirements.

The waste pickup and registration process is outlined on the attached chart. Again, waste can not be picked up from generators without an authorized signature on the waste manifest; however, as shown in the chart, individuals can easily update their authorization status in order to minimize any delay in picking up waste. Additional information may be requested by emailing [jmcbride@uab.edu](mailto:jmcbride@uab.edu) and including the words “satellite accumulation site” in the subject line.

