HAZARDOUS WASTE MANAGEMENT PLAN

This document is required as per Title 40 of the Federal Code of Regulations at part 262. It provides generalized rules and guidelines for The University of Alabama in Huntsville’s management of hazardous wastes.
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1.0 HAZARDOUS WASTE POLICY STATEMENT

The University of Alabama in Huntsville is committed to full compliance with federal, state, and local laws and regulations pertaining to the management of hazardous waste. The Office of Environmental Health & Safety has overall responsibility for policies and procedures for the management of hazardous waste on campus. The Director of Environmental Health and Safety is the University compliance officer with responsibility for oversight of the Hazardous Waste Management Program. The director is responsible (1) for developing and maintaining University policies related to tracking, handling, transportation, storage, disposal and maintenance of records of hazardous materials and (2) for designing and conducting training programs for University personnel regarding the management of hazardous waste from cradle to grave. Colleges, departments, or other units using or generating hazardous waste are responsible for maintaining accurate records to track hazardous materials from their purchase or generation through their storage and disposal. Colleges, departments, or other units may develop policies and procedures for dealing with hazardous waste within their units. These policies are subject to review by the Office of Environmental Health and Safety and must be consistent with University policies.

The Director of Environmental Health and Safety has overall responsibility for monitoring compliance with federal, state, and local regulations, and is responsible for identification of units within the University that may not be complying fully with regulations. The Director is responsible for providing notification of non-compliance to the units involved and for providing consultation regarding changes necessary to comply with regulations. When units fail to make necessary changes to comply with regulations, the Director is responsible for reporting such non-compliance to the vice president with administrative responsibility over the unit involved.

2.0 INTRODUCTION

The goal of the UAH Hazardous Waste Management Plan (HWMP) is to protect the health and safety of employees, students, and the environment while complying with applicable state and federal regulations. Implementation of a waste minimization program is vital to an effective hazardous waste management program. Utilizing procedures established within the HWMP the quantity and cost of hazardous waste disposals can be effectively reduced, the environment will be protected and employee safety will be enhanced. Planned purchases of only necessary quantities of chemicals and closeouts of laboratories will greatly reduce the hazardous waste output at UAH.

The objective of this plan is to define The University of Alabama in Huntsville’s (UAH) responsibilities under federal and state regulations governing hazardous waste disposal and to outline a program for compliance with those regulations. This plan is intended to provide instructions for UAH faculty and staff in the management of hazardous waste. Information contained in this manual is applicable to all University divisions, centers, schools, and departments. Since laboratory work frequently produces an unpredictable variety of wastes, much of the information provided within this document specifically addresses laboratory waste disposal.

The United States Environmental Protection Agency has implemented strict rules and regulations pertaining to the handling and disposal of hazardous wastes. The Resource Conservation and Recovery Act (RCRA) establishes the cradle-to-grave concept. This concept involves the tracking of a hazardous waste from the point of generation through its final disposition. If found to be in violation of RCRA laws
UAH could be fined up to $32,500 per day per violation. Additionally, criminal charges may be brought against individuals who knowingly violate state, federal, or local regulations. Failure to follow guidelines established within the UAH Hazardous Waste Management Plan could result in disciplinary action not to exclude termination of employment.

UAH at times produces more than 100 kilograms of hazardous waste in a month, and thus must meet the requirements regulating a small quantity generator, as established by the Resource Conservation and Recovery Act (RCRA). If at any time the University generates more than 1000 kilograms of hazardous waste or greater than one liter of acutely hazardous waste in one calendar month, the requirements for large quantity generators will be applied to the UAH HWMP. The applicable Environmental Protection Agency (EPA) regulations (40 CFR 261) are very demanding and require cooperation of all campus generators to meet compliance requirements.

Guidelines established in the plan are intended to create an awareness of chemical wastes that require special disposal and management procedures involved. Specific procedures for continuous operations (longer than one month) generating hazardous waste are to be developed by the overseeing laboratory director or facility manager and approved by the UAH Office of Environmental Health & Safety (OEHS). A good reference source for developing management procedures is "Achieving Compliance With Hazardous Waste Regulations Manual For Colleges and Universities"; Findley & Company, 1988, 2nd Ed. This book along with Material Safety Data Sheets should provide sufficient information to develop proper management procedures. Waste generators must contact the University’s OEHS at 824-2171 for specific and up to date advice on the disposal of any waste that is suspected of being regulated and/or hazardous.

The Hazardous Waste Management Plan shall serve as a guidance document for UAH employees to meet the challenges for providing a safe, environmentally sound, and unified response for chemical waste management. Note that certain laboratory procedures that have been acceptable in the past, including pouring chemicals down the drain (sewering) and evaporation of solvents in the fume hood, were performed with little regard to the quantity of chemicals involved or the associated hazards. These disposal practices are unacceptable. The University administration has therefore made a policy decision to prohibit such practices. If you are currently sewering waste as part of a process, it is imperative that the OEHS be notified, so that the disposal process can be reviewed, and if necessary, permitted.

All UAH personnel involved in any waste disposal process must read and have a thorough knowledge of the procedures contained within this guidance document. Each individual's participation is critically important in making the UAH Hazardous Waste Management Plan reliable, safe, and efficient.

3.0 HAZARDOUS WASTE DISPOSAL REGULATIONS

The federal government has aggressively approached the regulation of hazardous wastes. In 1976, Congress passed the Resource Conservation and Recovery Act (RCRA), and four years later the Environmental Protection Agency (EPA) issued complex and stringent regulations to implement Subtitle C of RCRA. In 1984 the Hazardous and Solid Waste Amendments became law, substantially revising and extending the scope of RCRA. The federal government has established a comprehensive cradle to grave system of monitoring hazardous wastes from the point of generation through the point of disposal. This system is still undergoing changes, especially with regard to wastes that are classified as hazardous. Sanctions for
noncompliance with EPA regulations are severe; they include criminal prosecution and fines of up to $32,500.00 per occurrence per day.

RCRA regulations are worded primarily to effectively control wastes produced by single waste-stream industrial generators, but are applicable to universities as well. UAH must not store, process, dispose of, transport, or offer for transport any hazardous waste without having received an EPA identification number. Nor can UAH offer hazardous waste to transporters or Treatment, Storage and Disposal Facilities (TSDFs) which have not received an EPA identification number. Before transporting hazardous waste to an off-site facility, all requirements for packaging, labeling, marking and placarding must be met. In addition, a uniform hazardous waste manifest must be properly executed and accompany each shipment. Any state that the hazardous waste shipment is transported through may also require a hazardous waste manifest specific for the state.

UAH can neither dispose of nor treat hazardous waste on-site. Only an EPA permitted disposal facility can legally landfill, incinerate, or recycle hazardous waste under the "cradle to grave" system. A waste generator never loses liability for environmental damage. For this reason, transporters and disposal facilities must be carefully chosen. The OEHS determines the TSDF through the bid system. Stringent criteria have been established to minimize environmental risk and University liability.

The EPA and the Alabama Department of Environmental Management (ADEM), who periodically perform inspections of hazardous waste collection procedures, documentation, and storage facilities, jointly enforce the regulations governing hazardous waste storage and disposal at UAH.

Regulations concerning small quantity generators are applicable to institutions or industries that generate between 100 and 1000 kilograms of hazardous waste per month. Generation at UAH may occasionally exceed 100 kilograms a month. Therefore UAH must comply fully with the regulations pertaining to small quantity generators. These regulations specify procedures and requirements for: 1) hazardous waste, identification, 2) shipping, 3) reporting, 4) accumulation time limits, 5) general sampling and waste analysis, 5) personnel training, 6) emergency contingency planning, and 7) record keeping. UAH is allowed to accumulate hazardous waste on-site for a maximum of 180 days as long as Small Quantity Generator status (100 - 1000kg/month of hazardous waste or <1kg/month of acutely hazardous waste) is not exceeded. If at any time UAH produces more than 1000 kilograms per month of hazardous waste, regulations pertaining to Large Quantity Generator status must be implemented to include an accumulation time limit of 90 days. All waste must then be transported to a permitted off-site waste disposal facility for further treatment, disposal, or recycling.

Local, state and federal law forbids the discharge of any hazardous waste into the public sanitary sewer system. In addition, due to recent developments, it is policy of UAH that no chemical wastes, laboratory or otherwise, be discharged into the sanitary sewer system. The OEHS is currently monitoring the effluent from UAH laboratories. Discharge limits regulated by the City of Huntsville must not be exceeded at any time. Individuals in charge of laboratories found to be discharging chemical wastes into the sanitary sewer system may face disciplinary action not excluding termination of employment. Any questions concerning the discharge of materials into the sanitary sewer system must be directed to the OEHS.

In conclusion, by state and federal guidelines, UAH is required to manage hazardous wastes in a safe and environmentally sound manner. All generators of hazardous waste are held legally responsible for ensuring that the applicable regulations concerning the management and disposal of hazardous waste
within your departments, laboratories, shops, or service areas are followed. The following sections are the basis of University policy.

### 4.1 HAZARDOUS WASTE MANAGEMENT SYSTEM

Chemical waste generated at UAH is managed through a procedural system called the hazardous chemical waste management system. This system encompasses the identification, labeling, storage, transportation and disposal of materials that are regulated as hazardous waste.

The hazardous chemical waste management system must achieve three goals:

1. **Protection of employee health and safety**
   Proper evaluation, packing and labeling protects the health and safety of employees handling or potentially exposed to hazardous chemical waste.

2. **Reduction of hazardous chemical waste volume in the laboratory**
   The volume of hazardous chemical waste generated at the University can be reduced by:
   a. Disposal of non-hazardous wastes separately from hazardous chemical wastes.
   b. Utilizing procedures for chemical waste minimization (Lab Safety Manual).
   c. Recycling of unused and reusable chemicals in teaching and research laboratories.

3. **Compliance with regulations**
   To ensure that UAH is in compliance with federal, state, and local regulations regarding packing, labeling, storage, transportation, and disposal of hazardous chemical wastes.

Wastes requiring special consideration that are not hazardous chemical wastes are:

1. **Non-hazardous solid waste** includes garbage, rubbish, paper, cardboard, aluminum cans, and glass. These items are collected and disposed of by the Grounds Department of Facilities and Operations. Glass from laboratory operations must be thoroughly rinsed and or decontaminated and disposed of in a glass receptacle. Persons responsible for the laboratory must securely seal these containers prior to removal from the laboratory.

2. **Bio-hazardous waste** includes, but is not limited to, tissue specimens, preserved specimens, and blood or other body fluids (Refer to the Biological Safety Plan for a complete listing). Departments generating bio-hazardous waste must have procedures in place for disposal of these wastes.

3. **Low level radioactive waste** includes, but is not limited to, radioactive solid lab trash, radioactive aqueous based wastes, radioactive flammable solvent based wastes, and liquid scintillation solutions. Disposal of radioactive waste is managed under the guidelines established in the UAH Radiation Safety Program. For more information contact the OEHS.

Compounds identified in the **Non-hazardous Chemical Registry**, Appendix B, should also be disposed of via the hazardous waste program. If they are components of a mixture with hazardous materials, the mixture is considered hazardous waste.
5.0 IDENTIFICATION AND DISPOSAL OF WASTES

The Office of Environmental Health and Safety is available to provide advice and guidance concerning the regulatory considerations of any proposed disposal. This office is also responsible for record keeping and arranging for the ultimate disposal of University generated hazardous wastes. A copy of the ADEM Administrative Code is available for review at the Office of Environmental Health and Safety or may be found at our Web Site located at www.uah.edu/admin/oehs.

6.1 HAZARDOUS WASTE DETERMINATION

The question of primary importance to most generators is "What wastes require special consideration?" On the basis of EPA criteria and the ADEM, chemical waste is considered hazardous if it is a Listed Hazardous Waste as described in 40 CFR 261 (see Appendix A). A waste is also considered hazardous if it exhibits any of the following characteristics: 1) ignitability, 2) corrosivity, 3) reactivity, or 4) toxicity; as described in Sections 5.1.1 through 5.1.4. The waste determination must be made at the point of generation.

Defined under RCRA Regulations as having one or more of the following characteristics:

EPA Listed Wastes–
- F list -nonspecific wastes (spent solvent wastes)–
- P list -acutely hazardous chemical products - unused/surplus materials–
- U list - unused/surplus chemical products

6.1 Characteristics Waste:–

6.1.1 Ignitable Waste
Any waste having a flash point of less than 60°C (140°F) is classified as an ignitable waste. The only exception is an aqueous solution containing less than 24% alcohol where alcohol is the only ignitable constituent. This exception is made because alcohol solutions at this concentration exhibit low flash points and are not capable of supporting combustion.

Conservative estimates of flash points should be made based on information found on the label of the container and on the Material Safety Data Sheets (MSDS). Secondary references such as the Merck Index, a chemical dictionary, or chemical supplier catalog may also be helpful. If the flash point is unknown, for instance with mixtures, it must be determined using a Pensky-Martens Closed Cup Tester, as specified in ASTM Standard D-93-79 or D-93-80. A Setaflash Closed Cup Tester as specified in ASTM Standard D-3278-78 may also be used.

Any chemical designated as a flammable liquid for shipping purposes will exhibit the characteristics of ignitability. Chemicals shipped as combustible liquids have flash points between 60.5°C (141°F) and 93°C (200°F), and therefore may be classified as an ignitable waste depending on the material's
actual flash point. Please note that there are different requirements for flammability classifications from EPA and the Department of Transportation (DOT).

Solids are regulated as ignitable waste if the material is capable of ignition through friction, moisture absorption, or spontaneous chemical changes and, when ignited burns so vigorously and persistently that it creates a hazard. Any solid material identified as flammable on the container, shipping paper, or MSDS, should be disposed of as a regulated ignitable waste.

RCRA also regulates oxidizers as ignitable wastes. The following common chemicals are characterized as oxidizers at certain concentrations:
Chlorates
Chromates
Chromium Trioxide
Dichromates
Hydrogen Peroxide¹
Perchlorates
Peroxides
Permanganates
Persulfates

6.1.2 Corrosive Waste
Any waste that exhibits the characteristic of corrosivity is regulated as a hazardous waste. The regulations define this as any material with a pH of less than 2 or greater than 12.5, or any material which will corrode steel at a rate greater than 6 mm (0.25 in.) per year. Wastes included in this category are solutions of strong acids and bases in concentrations greater than 0.01N. RCRA regulations permit spent corrosives to be neutralized by the generator. Neutralization must occur in a container compatible with the chemical(s) to be neutralized and must take place at the site where the wastes are generated. Note: Any precipitated material produced during neutralization must be collected and properly characterized prior to disposal.

6.1.3 Reactive Waste
Disposal of waste that is shock sensitive, unstable, reacts violently with air or water, or generates H₂S or HCN in pH condition between 2 and 12.5 is regulated as a reactive waste. With the exception of cyanide and sulfide solutions most reactive waste should only be disposed of with the assistance of explosives experts. The generation of these wastes must be avoided whenever possible. Some common chemicals that are classified as explosives include:
Picric acid and other polynitroaromatics, in dry form
Old ethers and other peroxide forming organics
Peroxides, transition-metal salts
Perchlorate salts
Diazonium slats, when dry

¹Hydrogen Peroxide solutions are regulated as oxidizers only in concentrations greater than 8%.
Chlorite salts of metals, such as AgClO₂
Azides, metal, nonmetal, and organic

Typical costs for disposing of reactive chemical wastes range from $50 to $100 per packaged pound. If containers of any of the above materials are located, contact the UAH Police immediately. Restrict area access and do not attempt to move these wastes.

6.1.4 Toxic Waste
A waste exhibits the characteristic of toxicity if, using the EPA's Toxicity Characteristic Leachate Procedure (TCLP), a representative sample of the waste contains any of the contaminants listed in Table 6-1 at the concentration equal to or greater than the regulatory limit.

Identification of materials regulated as hazardous waste is complicated by discrepancies in definitional guidelines used by the Environmental Protection Agency (EPA), Department of Transportation (DOT), and state agencies. The process of identification of hazardous chemical waste, therefore, must incorporate an understanding of the framework of EPA, DOT, and ADEM.

6.2 Acutely Hazardous Waste
Stock reagents and stock reagent containers of certain chemical compounds are strictly regulated as acutely hazardous waste. Rinsate and dilute spill cleanup material contaminated with these compounds are regulated.

Appendix A provides a list of compounds regulated under this category. Anyone planning to generate or purchase any quantity of an acutely hazardous waste should contact the OEHS prior to doing so in order to develop an appropriate waste management plan. The regulations regarding acutely hazardous wastes are much more stringent than those for other hazardous wastes. For example, accumulation at the point of generation is limited to only one quart or 1kg of an acutely hazardous waste.

6.3 Organic Solvents
RCRA identifies certain chemicals used as organic solvents under a specific set of regulatory requirements. At UAH, all organic solvents should be collected for disposal as hazardous waste.

<table>
<thead>
<tr>
<th>EPA HW #</th>
<th>Contaminant</th>
<th>Regulatory limit(mg/L)</th>
</tr>
</thead>
<tbody>
<tr>
<td>D004</td>
<td>Arsenic</td>
<td>5.0</td>
</tr>
<tr>
<td>D005</td>
<td>Barium</td>
<td>100.0</td>
</tr>
<tr>
<td>D018</td>
<td>Benzene</td>
<td>0.5</td>
</tr>
<tr>
<td>D006</td>
<td>Cadmium</td>
<td>1.0</td>
</tr>
<tr>
<td>D019</td>
<td>Carbon Tetrachloride</td>
<td>0.5</td>
</tr>
<tr>
<td>D020</td>
<td>Chlordane</td>
<td>0.03</td>
</tr>
<tr>
<td>D021</td>
<td>Chlorobenzene</td>
<td>100.0</td>
</tr>
<tr>
<td>D022</td>
<td>Chloroform</td>
<td>6.0</td>
</tr>
</tbody>
</table>

Table 6-1
Toxicity Characteristic Contaminants
<table>
<thead>
<tr>
<th>EPA Hazardous Waste Number</th>
<th>Compound</th>
<th>Concentration</th>
</tr>
</thead>
<tbody>
<tr>
<td>D007</td>
<td>Chromium</td>
<td>5.0</td>
</tr>
<tr>
<td>D023</td>
<td>o-Cresol</td>
<td>200.0&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>D024</td>
<td>m-Cresol</td>
<td>200.0&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>D025</td>
<td>p-Cresol</td>
<td>200.0&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>D026</td>
<td>Cresol</td>
<td>200.0&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>D016</td>
<td>2,4-D</td>
<td>10.0</td>
</tr>
<tr>
<td>D027</td>
<td>1,4-Dichlorobenzene</td>
<td>7.5</td>
</tr>
<tr>
<td>D028</td>
<td>1,2-Dichloroethane</td>
<td>0.5</td>
</tr>
<tr>
<td>D029</td>
<td>1,1-Dichloroethylene</td>
<td>0.7</td>
</tr>
<tr>
<td>D030</td>
<td>2,4-Dinitrotoluene</td>
<td>0.13&lt;sup&gt;3&lt;/sup&gt;</td>
</tr>
<tr>
<td>D012</td>
<td>Endrin</td>
<td>0.02</td>
</tr>
<tr>
<td>D031</td>
<td>Heptachlor</td>
<td>0.008</td>
</tr>
<tr>
<td>D032</td>
<td>Hexachlorobenzene</td>
<td>0.13&lt;sup&gt;3&lt;/sup&gt;</td>
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<tr>
<td>D033</td>
<td>Hexachlorobutadiene</td>
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</tr>
<tr>
<td>D034</td>
<td>Hexachloroethane</td>
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</tr>
<tr>
<td>D008</td>
<td>Lead</td>
<td>5.0</td>
</tr>
<tr>
<td>D013</td>
<td>Lindane</td>
<td>0.4</td>
</tr>
<tr>
<td>D009</td>
<td>Mercury</td>
<td>0.2</td>
</tr>
<tr>
<td>D014</td>
<td>Methoxychlor</td>
<td>10.0</td>
</tr>
<tr>
<td>D035</td>
<td>Methyl ethyl ketone</td>
<td>200.0</td>
</tr>
<tr>
<td>D036</td>
<td>Nitrobenzene</td>
<td>2.0</td>
</tr>
<tr>
<td>D037</td>
<td>Pentachlorophenol</td>
<td>100.0</td>
</tr>
<tr>
<td>D038</td>
<td>Pyridine</td>
<td>5.0</td>
</tr>
<tr>
<td>D010</td>
<td>Selenium</td>
<td>1.0</td>
</tr>
<tr>
<td>D011</td>
<td>Silver</td>
<td>5.0</td>
</tr>
<tr>
<td>D039</td>
<td>Tetrachloroethylene</td>
<td>0.7</td>
</tr>
<tr>
<td>D015</td>
<td>Toxaphene</td>
<td>0.5</td>
</tr>
<tr>
<td>D040</td>
<td>Trichloroethylene</td>
<td>0.5</td>
</tr>
<tr>
<td>D041</td>
<td>2,4,5-Trichlorophenol</td>
<td>400.0</td>
</tr>
<tr>
<td>D042</td>
<td>2,4,6-Trichlorophenol</td>
<td>2.0</td>
</tr>
<tr>
<td>D017</td>
<td>2,4,5-TP Silvex</td>
<td>1.0</td>
</tr>
<tr>
<td>D043</td>
<td>Vinyl Chloride</td>
<td>0.2</td>
</tr>
</tbody>
</table>

<sup>1</sup>EPA hazardous waste number.  
<sup>2</sup>Cannot be differentiated; Total Cresol is used.  
<sup>3</sup>Quantitation limit is higher than the regulatory limit. Quantitation number therefore becomes the regulatory limit.

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**Typical Campus Generators of Hazardous Wastes**

**Chemistry**—most chemicals used in labs, spent solvents, corrosives, oxidizers, reactives, heavy metals, etc.

**Biology**—hazardous chemicals and state regulated biological waste

**Fine Arts**—art studios, art lab, metal casting and sculpture studios, woodworking shop, theater shop, photography lab—oil-based paint, solvents, cleaners, acids used for etching, fixer, glues, etc.

**Physical Plant**—grounds, maintenance, paint shop, boiler plant—cleaning solvents, glue/adhesives, pesticides, waste oil, oil-based paints, fluorescent bulbs, HID bulbs, PCB ballasts, thermostats, etc…

**Student Photography Lab**—photo fixers
7.0 WASTE MINIMIZATION

To attain the UAH chemical waste management goals, the University strongly encourages its employees to utilize chemical waste minimization (waste reduction) techniques to reduce the volume and toxicity of chemical wastes produced at the University. An important benefit from waste minimization is that it reduces pollution that is directly related to quality of life indices. Even the best managed hazardous waste management programs produce quantities of pollution. Waste minimization decreases the expenses of ever-increasing chemical disposal costs. Generators should therefore modify procedures to eliminate or minimize the generation of hazardous waste by following common waste minimization techniques.

7.1 Minimizing Reactive Waste

Laboratory safety can be enhanced by the elimination of generating reactive waste by purchasing peroxide forming organics in quantities that are assured of being used within a short period of time. Containers of the following chemicals should be labeled with the date they are opened and discarded and disposed of within three months of the open date.
- Diisopropyl Ether (isopropyl ether)
- Divinylacetylene
- Potassium metal
- Potassium Amide
- Sodium Amide
- Vinylidene Chloride

The chemicals listed below should be dated when opened and discarded within six months of that date:
- Acetyaldehyde Diethyl Acetal (acetal)
- Chloroprene (2-chloro-1,3-butadiene)
- Cumene (isopropyl benzene)
- Cyclohexane
- Cyclopentene
- Decalin (decahydronaphthalene)
- Diacetylene (butadiene)
- Diethyl ether (ether)
- Diethylene Glycol Dimethyl Ether (diglyme)
- Dioxane
- Ethylene Glycol Dimethyl Ether (glyme)
- Ethylene Glycol Ether Acetates
- Ethylene Glycol Monoethers (cellusolve)
- Furan
- Methylacetylene
- Methylcyclopentane
- Methylisobutyl Ketone
- Styrene
- Tetrahydrofuran (THF)
Tertalin (tetrahydronaphthalene)
Vinyl Ethers

In addition, containers of picric acid and similar compounds should be labeled with a checklist for monthly addition of water sufficient to form a paste equivalent to 10% moisture by weight. **Reactive wastes should not be moved.** Contact the OEHS to arrange for pick-up.

### 7.2 Minimizing Quantities
It is common practice to order larger quantities of stock chemicals than necessary to take advantage of volume discounts. As a result, aging reagents or solvents are often left for disposal. This may result in disposal costs that are greater than the original savings. It is estimated that as much as 40% of laboratory waste may result from unused stock chemicals. Besides reducing disposal costs, smaller inventories reduce potential chemical exposure to personnel, thus minimizing the risks and severity of accidents.

### 7.3 Recycling
Many materials treated as chemical waste are actually surplus chemicals that are reusable. To assist waste reduction it is recommended that unopened or unwanted chemicals are transferred to laboratories where they may be used. OEHS surpluses unopened or unwanted chemicals. These chemicals are saved until they are no longer re-usable or for three years, then they are discarded with hazardous waste. Recycled chemicals are provided free of charge to any interested University department or research laboratory that may have a need for these chemicals.

Laboratories are required to develop schedules for routine inventory, cleaning, and removal of chemicals that are no longer needed. These chemicals are a liability and present a future expense as waste. The OEHS can determine if these chemicals are suitable for recycling or if they should be disposed of as hazardous waste.

**Note:** Certain chemicals are particularly desirable for recycling and include the following:

**Solvents**
- Acetone
- Chloroform
- Dichloromethane (Methylene Chloride)
- Ethyl Acetate
- Formaldehyde
- Hexanes
- Isopropyl Alcohol
- Methanol
- Petroleum Ether
- Toluene
- Xylenes

**Acids**
- Acetic Acid (glacial)
- Hydrochloric Acid
- Sulfuric Acid
### Oxidizers
- Bromine
- Potassium Chlorate
- Potassium Dichromate
- Silver Nitrate

#### 7.4 Substitution
Substitution of a non-hazardous or less hazardous chemical in place of a hazardous chemical is a commonly used method of reducing waste. A simple example of this is to change a cleaning agent from a toxic, flammable solvent to an appropriate soap or detergent solution. Other examples of substitution are: 1) the use of detergent instead of chromic acid in the cleaning of glassware; 2) the use of water based paints and cements over solvent based; 3) substituting non-halogenated, non-aromatic solvents for solvents such as benzene, methylene chloride, or carbon tetrachloride; and 4) avoiding the use of potentially explosive chemicals such as ethers or picric acid whenever possible.

#### 7.5 Reduction of Scale
Experimental laboratory procedures should be set up on as small a scale as possible. The use of methods requiring micro-quantities and equipment to handle these small volumes allow chemical reactions to be carried out on a much smaller scale than previously possible. For example, chromatographic techniques enable separation/purification of microgram quantities. Significant savings in chemicals, apparatus, and disposal costs can result.

#### 7.6 Donations, Free Samples, and Government Surplus of Chemical Items
UAH personnel must not accept chemical donations, free samples or purchase large quantities of government surplus of chemical items that will later become a disposal problem. These items should not be accepted unless there is an immediate need and adequate storage space available. No chemical should be accepted which has a limited shelf life unless for immediate use and in exact quantities. No University representative shall accept any chemical item: 1) without an accompanying Material Safety Data Sheet, and 2) in an original labeled container, that includes a shelf life date.

#### 7.7 Unknowns
Unknowns are a special problem in laboratories, especially with regard to a change in management and/or personnel. Therefore, it is important to incorporate maintenance schedules for routine laboratory inventories and cleanup and closeout in departmental procedures. Outdated and unwanted chemicals must be disposed of prior to personnel changes that would result in the new management of a laboratory, shop, storage facility, etc. Laboratory closeout procedures are available in the Laboratory Safety Manual.

Disregard for laboratory closeout is a primary source of University unknown chemicals. When an unknown is discovered, an intensive attempt at identification must be made. Usually consulting individuals who may have worked in the laboratory where the unknown was found can help to identify the contents. If this fails, the compound must be analyzed. Charges for chemical characterization procedures sufficient to prepare an unknown chemical for disposal are assessed by the OEHS, the analysis and disposal of “unknowns” may be charged back to the department.

Generation of unknowns should be avoided by performing periodic inspections of chemicals in the
laboratory to ensure that each is properly labeled. All waste containers must be labeled with 1) the chemical name, 2) the concentration(s), 3) the volume, and 4) the date a chemical was added to a mixture. In addition, waste containers must meet all labeling requirements as found in the Laboratory Safety Manual.

8.0 Hazardous Waste Collection Procedures

8.1 Segregation

All waste stored together must be compatible. Guidelines for segregation of chemicals as found in the Laboratory Safety Manual must be adhered to. Incompatible waste (oxidizers and organic solvents, for example) generated by a single laboratory should be separated by storing these materials in separate cabinets or shelves. Generally, classes, i.e. ignitables, corrosives, toxics, and reactives, should be segregated. This information will be listed on the label of each chemical or on the MSDS. Mixing of wastes that represent different hazard classes must be avoided.

8.1.1 Hazardous Waste Accumulation Area

All chemical waste containers must be stored in your laboratory’s designated hazardous waste accumulation area (HWAA). A standardized HWAA sign must be posted in the area. This will allow for easy inspection by regulatory authorities and clearly separates waste materials from chemicals in use.

8.1.2 Closed Container Rule

It is the responsibility of the lab/generator to control all the hazardous waste generated in that lab. Also to make sure that proper procedures are followed at all times by students, workers, visitors etc. Storage containers must be tightly capped at all times except when pouring waste. Waste containers venting out to the atmosphere is prohibited by law.

8.2 Packaging and Containers

Hazardous waste must be collected by generators in containers that meet Department of Transportation specifications. The same container or type of container in which a reagent was shipped will meet the specifications for shipment as waste. Laboratories purchasing solvents in bulk should package the solvent waste in one-gallon metal or glass containers with screw cap closures. Laboratories generating solvent waste in bulk may use five-gallon safety cans for the collection of waste in the laboratory. Laboratory waste containers will be picked up by OEHS personnel for bulk disposal into a 30 or 55-gallon drum. It is imperative for the safety of the OEHS employee that correct labeling is applied to the chemical waste container. UAH laboratories may have their waste containers picked up by submitting a pick up request through CHEMATIX™. All empty waste containers will be returned to the generating laboratory. Chlorinated organic solvents must be kept separate from non-chlorinated organic solvents. Separation of organic chlorinated and non-chlorinated solvents is essential due to the higher expense associated with disposal of chlorinated solvents. Mixtures of organic solvent waste that contain any proportion of chlorinated solvent
are considered chlorinated for disposal purposes. Low molecular weight ethers, such as diethyl ether, must be collected in a one-quart glass or metal container for incineration. Organic chemicals are generally collected in glass containers. Acids and bases should be collected and stored in glass or high-density polyethylene containers. Wastes containing hydrogen fluoride should also be stored and transported in DOT approved plastic containers. Powerful or toxic oxidizers should be collected in glass containers with Teflon lined caps. Waste for disposal should be placed in the smallest compatible container.

**Keep containers closed.** All chemical waste containers must be kept closed except when being used for the addition or removal of wastes. One of the most common cited safety hazards in University laboratories is open containers and labeling deficiencies.

**8.3 Labeling**
Each container must be labeled according to the guidelines outlined in the Laboratory Safety Manual. You must complete a CHEMATIX™ Waste Card for all wastes submitted for disposal. The waste card serves as a label. If you have not been trained on making a waste determination please contact OEHS to assist when you start a new bottle.

**8.4 Inspection**
Generators must inspect their accumulation areas to make sure that collection containers are clean, closed, properly labeled, segregated, and not leaking. In addition, generators must post a copy of the UAH hazardous waste management plan and inform all laboratory personnel of its location. The OEHS will conduct periodic inspections of laboratories known to generate hazardous waste to ensure compliance with this program and the hazardous waste regulations. Laboratory Audits are performed annually by OEHS. Results from these audits can be found in CHEMATIX™.

**8.5 Initiating Waste Removal**
To request a waste pick up, submit a Waste Pickup Worksheet through CHEMATIX™. Each container must have the CHEMATIX™ Waste Card attached before it will be removed. OEHS will not pick up waste that does not have a Waste Card attached to the container.

The OEHS coordinates the removal of chemical waste from the UAH campus a minimum of every 180 days, or as needed. In the event the UAH generator status increases from a small to a large quantity generator the frequency of disposal will increase to a minimum 90-day interval.

**Note:** The accumulation of over 55 gallons of waste or one quart of acutely hazardous waste in any facility except the authorized UAH waste storage area is not allowed under RCRA regulations. If a laboratory expects to generate quantities in excess of these limits within a three-month period, arrangements must be made with the OEHS to schedule pickups more frequently. The University’s hazardous waste disposal contractor will under special circumstances accept pressurized cylinders for disposal. Reusable cylinders should be returned to the supplier or manufacturer as soon as possible upon becoming empty as suppliers charge the University for rental of cylinders. Disposable cylinders should be completely emptied, the valve removed and the cylinder disposed of as solid waste.
9.0 EPA Empty Chemical Container Management

The EPA provides a specific definition of empty for containers that held hazardous chemicals:

1. A container or an inner liner removed from a container that has held any hazardous waste, is empty if:
   I. All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g. pouring, pumping, and aspirating, and
   II. No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container or inner liner, or
      a. No more than 3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 119 gallons in size; or
      b. No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gallons in size.

2. A container that has held a hazardous waste that is a compressed gas is empty when the pressure in the container approaches atmospheric.

3. A container or an inner liner removed from a container that has held an acute hazardous waste listed is empty if:
   I. The container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate;
   II. The container or inner liner has been cleaned by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal; or
   III. In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container, has been removed.

Laboratory Empty Chemical Container Management

- It is the responsibility of the OEHS to approve the disposal of chemical containers. Contact the OEHS prior to disposing any chemical container.
- Empty containers that held acutely toxic hazardous wastes (P-list) are managed as hazardous waste and given to OEHS for disposal. DO NOT TRIPLE RINSE. Keep the containers closed at all times. These are collected and disposed of by the OEHS.
- Empty containers of highly odoriferous materials like -thiols or mercaptans must also be given to OEHS for disposal to avoid creating odor issues in the lab or hallways. Empty containers of odoriferous materials should be placed into a bag and stored inside a fume hood until OEHS collects them for disposal. Submit a pick up request through CHEMATIX™ for disposal.
- All other containers - cross out original label with black marker and place your initials legibly on container.
- Remove and discard caps, place container in box designated for glassware disposal. When the box is full, secure the lid and tape it to the box. Place them in the hallway. The Custodial department removes these boxes.
10. **Miscellaneous Waste Rules**

**Compressed Gas Cylinders** - Disposal of compressed gas cylinders can cost hundreds of dollars depending upon the nature of the gas. Purchasing compressed gas in a returnable and/or refillable lecture bottle or cylinder could save money.

**Gas Cylinder Return** - It is the responsibility of the user/department to contact the manufacturer or vendor of the cylinder to confirm their policy on returns. Follow the instructions given by the vendor to ship or return the cylinder.

**Hazardous Waste Disposal** - Any gas cylinder that is not returnable will require management as a hazardous waste. The chemical gas mixture must be clearly identified on the "hazardous waste" label. The approximate pressure (psi) must also be noted on the label.

**Volatilization** - Volatile toxic substances should never be disposed of by evaporation in a fume hood. Such substances should be collected in suitable containers and properly labeled. Follow disposal procedures outlined in Section 8.0.

**Asbestos** - Asbestos and asbestos contaminated materials may not be cleaned up by University personnel unless, 1) personnel have received 16 hour asbestos awareness training, 2) personnel have completed respiratory protection training, 3) personnel participate in the medical surveillance program, and 4) adequate exposure monitoring is performed.

**Sharps** - All needles from syringes must be removed before disposal and placed in a sharps container.

**Infectious** – Follow all guidelines as listed in the biological waste disposal guide.

**Paints**

**Latex** - Water-based paints that are left over may be converted to a non-hazardous solid waste by adding a suitable filler material (vermiculite, cat litter) to completely solidify all paint – leave paint lid off can and dispose of completely solid and dry paint waste in the dumpster. **Preferred method is recycling through vendor by keeping all the left over paint in a good condition.** Wet latex paint should never be placed in the dumpster/trash.

**Oil-Base** - Oil-based left over paints must be collected and disposed of as hazardous waste. Store in designated Hazardous Waste Accumulation Area with CHEMATIX™ Waste Label attached. OEHS will provide the correct 55 gallon drum type if bulk packaging is desired. Do not mix in any two part or epoxy type paints! Try to substitute oil-based paint with water-based paint whenever possible to reduce the amount of hazardous waste generated. If there is excess oil-based paint, try to use it up completely by applying an extra coat over the intended area.

**Bulbs, Lamps and Thermostats** - All fluorescent bulbs/lamps and HID bulbs, thermostats should be disposed of as UNIVERSAL WASTE and sent to a certified recycler. Label storage area and boxes of used bulbs. Follow all guidelines provided in the Universal Waste Management Plan.
11.0 EMERGENCY PROCEDURES

Emergency procedures for spills and injuries are provided in the Laboratory Safety Manual and on the OEHS web site. UAH will utilize the Huntsville Fire Department HazMat Response Unit for emergency response actions involving unknown chemicals and spills requiring fully encapsulating personal protective equipment. All spills must be reported immediately to the UAH Public Safety Office at 824-6911. All laboratories must post UAH emergency phone numbers as provided in Appendix A of the Laboratory Safety Manual.

12.1 RESPONSIBILITY AND ENFORCEMENT

The establishment and enforcement of the Hazardous Waste Management Plan is under the auspices of the OEHS which acts in an advisory capacity to the Assistant VP for Facilities and Operations. The OEHS will review policies, hear complaints and make final recommendations to the AVP regarding policies related to hazardous materials on campus.

Audits of satellite waste accumulation areas on campus will be conducted on a periodic basis in a manner similar to those conducted by regulatory agencies. If there are any noted deficiencies, an audit report that includes an explanation of the deficiency will be sent to the person in charge of the laboratory. Although many deficiencies may seem trivial (open container), any infraction is a violation of the hazardous waste regulations and must be corrected. The PI must respond to the finding in the CHEMATIX™ system within 30 days. If no response is received within 30 days, the Chair of the Department will be informed. All inspection reports will be kept on file and will be available for state and federal regulatory authorities to review.

OEHS will conduct a regular inspection of the 180 day accumulation areas at least every seven days to comply with state and federal regulations. The current inspection record will be maintained in the accumulation area and past inspection records will be kept in the OEHS.

Due to the seriousness of non-compliance and/or complacency with existing Federal, State and local regulations, which may result in civil and/or criminal liabilities, the policies and guidelines presented in this document must be followed as a minimum. Failure to comply, blatant disregard, or multiple infractions may result in disciplinary action not excluding termination of employment.
Lists of Hazardous Wastes

(1) General.

(a) A solid waste is a hazardous waste if it is listed below, unless it has been excluded from this list under 335-14-1-.03(2). (Alabama Administrative Code)

(b) ADEM has indicated its basis for listing the classes or types of wastes by employing one or more of the following Hazard Codes:

- Ignitable Waste (I)
- Corrosive Waste (C)
- Reactive Waste (R)
- Toxicity Characteristic Waste (E)
- Acute Hazardous Waste (H)
- Toxic Waste (T)

(c) Each hazardous waste listed in this appendix is assigned an EPA or Alabama Hazardous Waste Number which precedes the name of the waste. This number must be used in complying with the notification requirements of Section 3010 of the RCRA and certain recordkeeping and reporting requirements under Chapters 335-14-3 through 335-14-6, 335-14-8, and 335-14-9.

(d) The following hazardous wastes listed in paragraphs (2) or (3) of this section are subject to the exclusion limits for acutely hazardous wastes established in 335-14-2-.01(5): EPA Hazardous Wastes Nos. F020, F021, F022, F023, F026, and F027.

(2) Hazardous wastes from non-specific sources.

(a) The following solid wastes are listed hazardous waste from non-specific sources unless they are excluded under § 260.20 of 40 CFR and 335-14-1-.03(2) and listed in 335-14-2-Appendix IX. Only the items applicable to UAH at the time of printing this manual have been included. Refer to the CFR on-line for more information.
<table>
<thead>
<tr>
<th>Hazardous Waste Number</th>
<th>Hazardous Waste</th>
<th>Hazard Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>F001</td>
<td>The following spent halogenated solvents used in degreasing: tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.</td>
<td>(T)</td>
</tr>
<tr>
<td>F002</td>
<td>The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.</td>
<td>(T)</td>
</tr>
<tr>
<td>F003</td>
<td>The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/blends containing, before use, only the above spent non-halogenated solvents; and all spent solvent mixtures/blends containing, before use, one or more of the above non-halogenated solvents, and a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.</td>
<td>(I)*</td>
</tr>
<tr>
<td>F004</td>
<td>The following spent non-halogenated solvents: cresols and cresylic acid, and nitrobenzene; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.</td>
<td>(T)</td>
</tr>
<tr>
<td>F005</td>
<td>The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-nitropropane;</td>
<td>(I,T)</td>
</tr>
<tr>
<td>Hazardous Waste Number</td>
<td>Hazardous Waste</td>
<td>Hazard Code</td>
</tr>
<tr>
<td>------------------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.</td>
<td>(R,T)</td>
<td></td>
</tr>
<tr>
<td>F007</td>
<td>Spent cyanide plating bath solutions from electroplating operations.</td>
<td>(R,T)</td>
</tr>
<tr>
<td>F008</td>
<td>Plating bath residues from the bottom of plating baths from electroplating operations where cyanides are used in the process.</td>
<td>(R,T)</td>
</tr>
<tr>
<td>F009</td>
<td>Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process.</td>
<td>(R,T)</td>
</tr>
<tr>
<td>F010</td>
<td>Quenching bath residues from oil baths from metal heat treating operations where cyanides are used in the process.</td>
<td>(R,T)</td>
</tr>
<tr>
<td>F011</td>
<td>Spent cyanide solutions from salt bath pot cleaning from metal heat treating operations.</td>
<td>(R,T)</td>
</tr>
</tbody>
</table>

* (I,T) should be used to specify mixtures containing ignitable and toxic constituents.

(b) Listing Specific Definitions:

1. For the purposes of the F037 and F038 listings, oil/ water/solids is defined as oil and/or water and/or solids.

2. (i) For the purposes of the F037 and F038 listings, aggressive biological treatment units are defined as units which employ one of the following four treatment methods: activated sludge; trickling filter; rotating biological contactor for the continuous accelerated biological oxidation of wastewaters; or high-rate aeration. High-rate aeration is a system of surface impoundments or tanks, in which intense mechanical aeration is used to completely mix the wastes, enhance biological activity, and

(I) the units employ a minimum of 6 hp per million gallons of treatment volume; and either

(II) the hydraulic retention time of the unit is no longer than 5 days; or

(III) the hydraulic retention time is no longer than 30 days and the unit does not generate a sludge that is a hazardous waste by the Toxicity Characteristic;

(ii) Generators and treatment, storage and disposal facilities have the burden of proving that their sludges are exempt from listing as F037 and F038 wastes under this definition. Generators and treatment, storage and disposal facilities must maintain, in their operating or other on-site records, documents and data sufficient to prove that:
(I) the unit is an aggressive biological treatment unit as defined in this subparagraph; and

(II) the sludges sought to be exempted from the definitions of F037 and/or F038 were actually generated in the aggressive biological treatment unit.

3. (i) For the purposes of the F037 listing, sludges are considered to be generated at the moment of deposition in the unit, where deposition is defined as at least a temporary cessation of lateral particle movement.

(ii) For the purposes of the F038 listing,

(I) sludges are considered to be generated at the moment of deposition in the unit, where deposition is defined as at least a temporary cessation of lateral particle movement, and

(II) floats are considered to be generated at the moment they are formed in the top of the unit.

(3) Hazardous wastes from specific sources.

Solid wastes that are listed hazardous wastes from specific sources have not been listed in this reference document because at the time of printing none applied to UAH research and learning activities.

(4) Commercial Chemical Products

Commercial chemical products that are in their pure state are out of date or off specification are hazardous wastes if listed below. Those wastes that have an EPA identification number beginning with the letter P are considered acutely hazardous. No more than 1 liter of acutely hazardous waste can be generated at UAH per month. In the event that more than 1 liter of acutely hazardous waste is generated in a one month period UAH will become a large quantity generator and must abide by the rules and regulations set forth by local, state and federal governmental authorities.

<table>
<thead>
<tr>
<th>Hazardous Waste No.</th>
<th>Chemical Abstracts No.</th>
<th>Substance</th>
</tr>
</thead>
<tbody>
<tr>
<td>P023</td>
<td>107-20-0</td>
<td>Acetaldehyde, chloro-</td>
</tr>
<tr>
<td>P002</td>
<td>591-08-2</td>
<td>Acetamide, N-(aminothioxomethyl)-</td>
</tr>
<tr>
<td>P057</td>
<td>640-19-7</td>
<td>Acetamide, 2-fluoro-</td>
</tr>
<tr>
<td>P058</td>
<td>62-74-8</td>
<td>Acetic acid, fluoro-, sodium salt</td>
</tr>
<tr>
<td>P002</td>
<td>591-08-2</td>
<td>1-Acetyl-2-thiourea</td>
</tr>
<tr>
<td>P003</td>
<td>107-02-8</td>
<td>Acrolein</td>
</tr>
<tr>
<td>P070</td>
<td>116-06-3</td>
<td>Aldicarb</td>
</tr>
<tr>
<td>P203</td>
<td>1646-88-4</td>
<td>Aldicarb sulfone</td>
</tr>
<tr>
<td>P004</td>
<td>309-00-2</td>
<td>Aldrin</td>
</tr>
<tr>
<td>Hazardous Waste No.</td>
<td>Chemical Abstracts No.</td>
<td>Substance</td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>P005</td>
<td>107-18-6</td>
<td>Allyl alcohol</td>
</tr>
<tr>
<td>P006</td>
<td>20859-73-8</td>
<td>Aluminum phosphide (R,T)</td>
</tr>
<tr>
<td>P008</td>
<td>504-24-5</td>
<td>5-(Aminomethyl)-3-isoxazolol</td>
</tr>
<tr>
<td>P007</td>
<td>2763-96-4</td>
<td>4-Aminopyridine</td>
</tr>
<tr>
<td>P009</td>
<td>131-74-8</td>
<td>Ammonium picrate (R)</td>
</tr>
<tr>
<td>P119</td>
<td>7803-55-6</td>
<td>Ammonium vanadate</td>
</tr>
<tr>
<td>P009</td>
<td>506-61-6</td>
<td>Argentate(1-), bis(cyano-C)-, potassium</td>
</tr>
<tr>
<td>P010</td>
<td>7778-39-4</td>
<td>Arsenic acid H(_3)AsO(_4)</td>
</tr>
<tr>
<td>P012</td>
<td>1327-53-3</td>
<td>Arsenic oxide As(_2)O(_3)</td>
</tr>
<tr>
<td>P011</td>
<td>1303-28-2</td>
<td>Arsenic oxide As(_2)O(_5)</td>
</tr>
<tr>
<td>P011</td>
<td>1303-28-2</td>
<td>Arsenic pentoxide</td>
</tr>
<tr>
<td>P012</td>
<td>1327-53-3</td>
<td>Arsenic trioxide</td>
</tr>
<tr>
<td>P038</td>
<td>692-42-2</td>
<td>Arsine, diethyl-</td>
</tr>
<tr>
<td>P036</td>
<td>696-28-6</td>
<td>Arsonous dichloride, phenyl-</td>
</tr>
<tr>
<td>P054</td>
<td>151-56-4</td>
<td>Aziridine</td>
</tr>
<tr>
<td>P067</td>
<td>75-55-8</td>
<td>Aziridine, 2-methyl-</td>
</tr>
<tr>
<td>P013</td>
<td>542-62-1</td>
<td>Barium cyanide</td>
</tr>
<tr>
<td>P024</td>
<td>106-47-8</td>
<td>Benzenamine, 4-chloro-</td>
</tr>
<tr>
<td>P077</td>
<td>100-01-6</td>
<td>Benzenamine, 4-nitro-</td>
</tr>
<tr>
<td>P028</td>
<td>100-44-7</td>
<td>Benzene, (chloromethyl)-</td>
</tr>
<tr>
<td>P042</td>
<td>51-43-4</td>
<td>1,2-Benzenediol, 4-[(1-hydroxy-2-(methylamino)ethyl)]-, (R)-</td>
</tr>
<tr>
<td>P046</td>
<td>122-09-8</td>
<td>Benzeneethanamine, alpha, alpha-dimethyl-</td>
</tr>
<tr>
<td>P014</td>
<td>108-98-5</td>
<td>Benzenethiol</td>
</tr>
<tr>
<td>P127</td>
<td>1563-66-2</td>
<td>7-Benzofuranol, 2,3-dihydro-2,2-dimethyl-, methylcarbamate</td>
</tr>
<tr>
<td>P188</td>
<td>57-64-7</td>
<td>Benzoic acid, 2-hydroxy-, compd. With (3αS-cis)-1,2,3,3a,8,8a-hexahydro-1,3a,8-trimethylpyrrolo [2,3-b]indol-5-yl methylcarbamate ester (1:1)</td>
</tr>
<tr>
<td>P001</td>
<td>181-81-2</td>
<td>2H-1-Benzopyran-2-one, 4-hydroxy-3-(3-oxo-1-phenylbutyl)-, &amp; salts, when present at concentrations greater than 0.3%</td>
</tr>
<tr>
<td>P028</td>
<td>100-44-7</td>
<td>Benzyl chloride</td>
</tr>
<tr>
<td>P015</td>
<td>7440-41-7</td>
<td>Beryllium powder</td>
</tr>
<tr>
<td>P017</td>
<td>598-31-2</td>
<td>Bromoacetone</td>
</tr>
<tr>
<td>P018</td>
<td>357-57-3</td>
<td>Brucine</td>
</tr>
<tr>
<td>Hazardous Waste No.</td>
<td>Chemical Abstracts No.</td>
<td>Substance</td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>P045</td>
<td>39196-18-4</td>
<td>2-Butanone, 3,3-dimethyl-1-(methylthio)-, O-[methylamino]carbonyl] oxime</td>
</tr>
<tr>
<td>P021</td>
<td>592-01-8</td>
<td>Calcium cyanide</td>
</tr>
<tr>
<td>P189</td>
<td>55282-14-8</td>
<td>Carboxisulfan, methyl-, 3-methylphenyl ester</td>
</tr>
<tr>
<td>P191</td>
<td>644-64-4</td>
<td>Carboxisulfan, methyl-, 3-methylphenyl ester</td>
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<td>Cyanides (soluble cyanide salts), not otherwise specified</td>
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<td>Warfarin, &amp; salts, when present at concentrations greater than 0.3%</td>
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<td>Zinc phosphide Zn(_3)P(_2), when present at concentrations greater than 10% (R,T)</td>
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</table>

1 CAS Number given for parent compound only.

(f) The commercial chemical products, manufacturing chemical intermediates, or off-specification commercial chemical products referred to in the Alabama Administrative Code, are identified as toxic wastes (T) unless otherwise designated. There is a small quantity exclusion that applies to these wastes. Contact the OEHS for more information.

These wastes and their corresponding EPA Hazardous Waste Numbers are:

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<td>U070</td>
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<td>Benzene, 1,4-dichloro-</td>
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<td>Benzene, (dichloromethyl)-</td>
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<td>Benzene, dimethyl-(I,T)</td>
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<td>81-81-2</td>
<td>2H-1-Benzopyran-2-one, 4-hydroxy-3- (3-oxo-1-phenyl-butyl)-, &amp; salts, when present at concentrations of 0.3% or less</td>
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<td>1,3-Butadiene, 1,1,2,3,4,4-hexachloro-</td>
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<td>2-Butenoic acid, 2-methyl-, 7-[2,3-dihydroxy-2-(1-methoxyethyl)-3-methyl-1-oxobutoxy]methyl]-2,3,5,7a-tetrahydro-1H-pyrrrolizin-1-yl ester, [1S-[1alpha(Z),7(2S*,3R*),7aalpha]-</td>
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<td>Carbonic acid, dithallium(1+) salt</td>
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<td>Carbon oxyfluoride (R,T)</td>
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<td>Carbon tetrachloride</td>
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<td>2,5-Cyclohexadiene-1,4-dione</td>
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<td>Warfarin, &amp; salts, when present at concentrations of 0.3% or less</td>
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<td>Yohimban-16-carboxylic acid, 11,17-dimethoxy-18-[(3,4,5-trimethoxy-benzoyl)oxy]-, methyl ester, (3beta,16beta,17alpha,18beta,20alpha)-</td>
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<td>Zinc phosphide, Zn$_3$P$_2$, when present at concentrations of 10% or less</td>
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1 CAS Number given for parent compound only.
# HWMP - APPENDIX B

## NON-REGULATED CHEMICAL WASTES

### Common Non-Regulated Chemical Waste

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<td>SODIUM TUNGSTATE</td>
</tr>
<tr>
<td>50704A</td>
<td>SORBITOL, D-</td>
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87796A SORBOSE, L(-)-
UOFM1123A STAPHYLOCOCCAL ENTEROTOXIN
9005258A STARCH, ELECTROPHORESIS
9005849A STARCH, SOLUBLE
9001621A STEAPSIN
1633052A STRONTIUM CARBONATE
57501A SUCROSE
2447576A SULFADOXINE
12070063A TANTALUM CARBIDE
87694A TARTARIC ACID, L(+)-
67038A THIAMINE HYDROCHLORIDE
80682A THREONINE, DL-
72195A THREONINE, L-
9005849B THYODENE
13463677A TITANIUM DIOXIDE
7758874C TRICALCIUM PHOSPHATE
7601549A TRISODIUM PHOSPHATE, INDICATOR
9002077A TRYPsin
51672C TYROSINE, D-
556025A TYROSINE, DL-
60184A TYROSINE, L-
9002124A URICASE
58968A URIDINE
72184A VALINE, L-
121346B VANILIC ACID
121335A VANILLIN
68199B VITAMIN B12
83885A VITAMIN B2
7695912B VITAMIN E
59029B VITAMIN E
83705A VITAMIN K-5
69896A XANTHINE
9010666A ZEIN
7779900A ZINC PHOSPHATE