Be Prepared for State Hazardous Waste Inspections.

Who inspects our waste accumulation areas and why? The Nevada Division of Environmental Protection (NDEP) periodically conducts compliance inspections as a part of their program to evaluate and enforce compliance with federal hazardous waste regulations.

What are NDEP inspectors looking for? Inspectors have previously concentrated on the points of chemical waste generation. Missing or loose waste container lids and improper labeling of waste containers have been the primary reasons for hazardous waste regulatory violations. Inspectors may enter any laboratory, shop, or other area that uses hazardous materials. Inspectors may ask to speak with a person in charge of chemical waste management for that area and will want to see where waste is accumulated. Inspectors may also check for eyewashes, fire extinguishers, emergency contact lists, and spill kits. The inspector will focus on the items in this checklist.

COMPLETE the self-audit checklist below. If you can answer yes to all of the questions, you should be well-prepared for a hazardous waste inspection.

☐ Do you know if your waste is hazardous? Your waste is hazardous if it is flammable, toxic, reactive and/or corrosive. Look for hazards listed on the chemical’s label and/or SDS (or MSDS). More information is available at the following links:

  SDS and MSDS Search: [http://www.unr.edu/ehs/sds-data](http://www.unr.edu/ehs/sds-data)

☐ Have you disposed of “waste-like,” legacy, and unknown chemicals? Manage any of these as chemical waste. Waste-like chemicals have deteriorating labels, failing containers, or are otherwise neglected. Legacy chemicals are unwanted chemicals sometimes left behind by previous occupants. Environmental Health & Safety (EH&S) will arrange for testing of “unknowns” before disposal.
☐ Are you using appropriate containers and keeping containers closed? Accumulate waste in sturdy, compatible containers. EH&S supplies one, three, and five gallon containers for waste accumulation. Keep containers closed when not adding waste to the container. Use bus tubs to contain leaks and spills. Waste generated from an apparatus must have the tubing entering through a tight-fitting hole in the closed cap of the waste container - NO EXCEPTIONS! Do not forget to label waste containers fed from tubing – even if the constituent is water.

☐ Are your waste containers properly labeled? Containers are delivered with an orange chemical waste label attached to the container. Orange chemical waste labels must have the appropriate boxes checked (Flammable, Corrosive, Toxic, etc.). Abbreviations, formulas, or brand names (e.g., HPLC Waste, T-100 Waste, etc.) are not acceptable. Additionally, the constituents must be listed on the label or on a separate log sheet attached to the waste container. Completely deface or cover original labels on containers if they previously contained a reagent chemical or different waste chemical.

☐ Do you accumulate waste in a safe location? Choose accumulation areas away from aisles, doors, and safety showers. Segregate incompatible wastes. DO NOT accumulate more than 55 gallons of chemical waste. Keep work areas clear.

☐ Are you prepared for spills and other emergencies? You can request a spill kit (at no cost) for your laboratory via the EH&S online waste submission system (select the Replacement Waste Containers form). For Major Emergencies Call 911. If there is risk of fire or exposure outside of lab, activate fire alarm. For spill advice or help, call EH&S line 327-5040.

☐ Do you know how to request waste collection? For a waste that is generated routinely, use the EH&S Online Waste Submission system located on the EH&S website. The waste submission forms require log-in with your net ID and password. You must submit online requests to schedule waste removal.

☐ Do you have documented training? All persons handling waste must attend lab safety training. Lab safety training, offered by EH&S, outlines chemical hazards, waste accumulation procedures, spill response and more. To browse available classes and to register, use the EH&S Learning Management System located on the EH&S website.

** Please correct any deficiencies noted on the checklist. **
NOTES & REMINDERS

- Keep loose lids on **Lab Trash** and **Glassware** containers to control odors.
- Do not throw aerosol cans (even canned air) in garbage. Submit a request to EH&S for removal. Store aerosol cans in a closed container labeled “Aerosol Cans ONLY.”
- All oil collection containers must be labeled with the words “**USED OIL.**”
- **DO NOT POUR** anything down the drain unless you have prior approval from EH&S.
- Negotiate cylinder exchange agreements with compressed gas vendors.
- Compressed gas cylinders must be physically secured.

There is no direct charge for routine hazardous waste collection and disposal. The generator may, however, be responsible for costs associated with unknown chemical identification; highly hazardous gas cylinder testing, packaging, and disposal; and for costs associated with the stabilization of peroxide-formers and other highly reactive chemicals.

Please contact EH&S with any questions or concerns about hazardous waste management:

**Chad Stephens**, Manager, Regulated Waste Programs at 784-1987 [chadstephens@unr.edu](mailto:chadstephens@unr.edu)

**Marty Schwender**, Hazardous Materials Specialist at 784-4524 [jms@unr.edu](mailto:jms@unr.edu)

**Ben Owens**, Laboratory Safety Manager at 327-5196 [bowens@unr.edu](mailto:bowens@unr.edu)

**EH&S Department Main Office** 327-5040 (this is a 24 hour line)

*The Environmental Health and Safety Office
Thanks You For Your Cooperation!*