

Washington State University Vancouver

To: Washington State Dept. of Ecology
From: Joseph J. Price
Environmental Health & Safety Coordinator
Washington State University Vancouver (WSUV)

Date: December 19, 2017

SUBJECT: Proposed changes to WAC 173-303

Greetings! Pertaining to the proposed changes of WAC 173-303 (Dangerous Waste Management), I offer the following comments pertaining to waste management from an Academic Institution viewpoint.

Item #1:

In reference to proposed change 173-303-040, definition of "Point of Generation". WSU Vancouver (WSUV) is a four-year research facility. Research occurs daily and throughout the year and entails a large variety of instrumentation and a variety of what is classified as Dangerous Waste. The requirement that waste generation will be revised to both "time and place" places an undue and unnecessary requirement on any research facility. Currently, satellite accumulation areas have proven to meet existing requirements. The additional requirement of "time and date" on each container may create undue burden with little benefit or enhancement of the satellite accumulation areas. This additional burden will decrease the availability of Environmental Health and Safety personnel to other tasks of greater benefit.

Item #2:

In reference to proposed change 173-303-040, definition of "Weekly Inspection". The current lab management regulations require a weekly inspection of the waste Centralized Accumulation Area (CAA). A stringent requirement of a 7-day separation has minimal benefit or enhancement of safety while creating only marginal reduction in risk for the management of waste classified as dangerous. This would create undue burden on institutions with limited staff dedicated to dangerous waste management. Should a singular individual be sick or tasked with other duties other than the weekly inspection there exists no flexibility other than a singular day within the 7-day window. The requirement of a weekly inspection should be allowed to remain as is in the current regulations.

Item #3:

In reference to proposed change 173-303-171(1)(e)(ix)(B). Due to the on-going research projects conducted, I receive numerous dangerous waste containers of all sizes and dimension. A 25ml glass bottle is impractical to identify with a label that can be read from 25-feet and with a letter height of ½". It may cause the use of a larger container solely to support the size of the required label which would be wasteful and require irresponsible use of large containers solely for labeling purposes. This wasteful use of containers would by itself create more waste which is contrary to our practices to reduce, reuse and recycle. Being a research facility, many of the Dangerous Waste materials generated are mixtures versus pure materials. The sticker must identify all components contained within so in addition to the required lettering of the sticker, the internal components are hand written making a 25-foot visibility requirement very difficult to be a reality. WSUV maintains an internal Dangerous Waste manifest separate from the containers which identifies all components within the container. With such a manifest, a first responder would only have to review the

manifest(s) to identify all material(s) within the CAA. Within the CAA at WSUV, all containers are maintained within a dedicated ventilation systems.

Item #4:

Intentionally omitted.

Item #5:

In reference to proposed change 173-303-172(13), WSUV will be required to identify all facility operations which generate Dangerous Waste with the capability of endangering the environment and/or public. WSUV fully operates in practice with its Medium Quantity Generator (MQG) permit requirements and has not experienced a spill or release in recent history. These new rules would require WSUV to formulate an inspection schedule (outside the on-going required weekly CAA inspection) and both post and maintain the schedule. WSUV feels this is a redundancy in regulatory compliance and places an undue burden with minimal benefit or risk reduction for a small facilities like ours if an additional scheduled inspection is required.

Item #6:

In reference to proposed change 173-303-173. This proposed change may be an enhancement to allow and enable the processing of wastes on an episodic basis. This proposed process for "episodic generation" present a few challenges. Episodic generation can be either "planned or unplanned" events that exceed the monthly quantity exclusion limits. The 30-day notification period to the Department of Ecology is unrealistic for an unplanned episode to be addressed through this process. It should be reduced to something like a seven day notification.

Joe Price
WSUV EH&S
jj.price@wsu.edu