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Generator Improvement Rules-We have concerns about 2 of the proposed changes that go beyond what the EPA rules require.

1) Requirement for labeling to be visible at a distance of 25 ft or 1/2" in height. We do not feel that the risk with hazardous waste is any higher than the risk of the same category of unused materials. We feel that the negligible increase to safety does not justify the added expense of printing new labels, training staff on the change or having to re-package very small containers so that the label will fit. It does not appear that the potential cost of this change was considered in this proposed rule. Also this goes far beyond what is required for unused hazardous materials by other regulatory bodies such as OSHA/L&I, Fire Code or USDOT. In my many years as a first responder and assisting with chemical spills and releases I have not encountered any situations where this change would have helped the response. At my facility hazardous waste containers are such a small percentage of overall chemical spills I do not see this change improving the safety of workers or responders. Your assumption during the webinar and in person training for this change implies there are really only 4 hazard primary hazards (Ignitable, Corrosive, Reactive and Toxic) this not compatible with either OSHA's GHS or USDOT hazard classification. As these containers may be labeled per these other standards prior to becoming waste, this may lead to misleading or contrary labeling or confusion as to the actual exposure risk of materials handled by students and researchers.

2) Weekly inspection definition to be "...no more than 7 consecutive calendar days...". While we agree that allowing up to 13 days between weekly inspections is too long. We feel that the inflexibility of requiring it to be 7 days does not allow for holidays or occasional inclement weather. We feel that a simple modification to allow weekly inspections to "...not exceed 9 consecutive calendar days..." would allow some flexibility without adversely impacting safety or the intent of the Federal Rule.