

WSU Comments to propose changes to the Washington Dangerous Waste Regulations

[Generator Improvement Rule \(WAC 173-303\)](#)

Washington State University (WSU) reviewed the proposed Generator Improvement Rule and Ecology's response to informal Comments. While we have concerns about several proposed changes we are choosing to focus on one topic, Hazard Labels and Labeling Leg

WSU respectfully disagrees with the Department of Ecology's response to comments regarding Hazard Labels and Labeling Legibility.

The proposed lettering requirements provide minimal value to emergency responders at our facilities while significantly impacting storage and handling. WSU takes pride in our waste minimization practices over the last 20 plus years. This has allowed us to maintain our hazardous waste volumes even with a large increase in research, building square footage, employees, and students. This change was made possible in part through microscaling. We handle tens of thousands of containers annually with a majority being smaller than 10 milliliters. An individual laboratory could potentially have several hundred containers with multiple hazards. In your response to Hazard Labels and Labeling Legibility comments you provided suggestions to help generators meet this new requirement. However, having to use that many over packs in a lab negatively affects storage capacity, is extremely expensive, and definitely does not improve emergency responders ability to do their jobs safely. WSU strongly encourages Ecology to reconsider these proposed changes.

Similarly, we are concerned about the implementation of these new label requirements if the regulations are approved as proposed. We currently have satellite accumulation areas in over 2,000 locations, and have distributed over 50,000 labels to meet the needs of the generators. It will not be possible to implement label changes and eliminate the use of our current labels prior to the proposed effective date of February 16, 2019.

Finally, staying in compliance at a research institute is difficult when you must communicate with a rotating audience of faculty and students. Trying to enforce a regulation, which does not in our opinion improve public or environmental health and safety, is difficult to justify. I would like to use an example of a 10 mL vial of sodium chloride or table salt. Under state regulations, this is a dangerous waste that must be managed per WAC 173-303. You are now asking us to use a secondary bin in order to attach a label that in no way improves safety, but takes away valuable research space.

We respectfully ask you to reconsider your labeling requirements and write regulations equivalent to the Environmental Protection Agency standard.

Thank you for the consideration.