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The proposed changes to section 630(3) are going to make hazardous waste collection and disposal at the university level considerably less safe, harder to encourage researchers to comply with, and more expensive.

Environmental Health & Safety collects waste from researchers that are sometimes in very small containers, 50mL or less. If the researcher has to place the tiny container into a large container so that the hazard sticker(s) is big enough, EH&S will have to stick our hands into the large containers to retrieve the smaller ones. If we don't place absorbent in the container we risk having containers spill in the bottom and if we do place absorbent we will have to dig through the absorbent to find the containers. Either way, the hazard has increased for EH&S staff.

The larger containers will cause overcrowding in SAAs and in the labs, where space is at a premium. Being able to read hazard labels from in the hallway, which is where 25 feet away would be, is not going to be useful to anyone because lab doors are kept closed. This requirement will be seen as ridiculous by researchers, who are hard enough to convince to comply with reasonable rules and laws, and "it's the law" will be the only response we have because the new practice will not be safer or more efficient.

The cost will also be quite large. We will have to buy larger containers to hold the smaller ones, waste with more than one hazard will need extremely large containers to accommodate more than one label. We will have to replace all the hazard labels we currently have and buy huge quantities of very large labels, which are considerably more expensive than the smaller ones. This cost will be a double waste of state resources, once because we are disposing of materials we have already paid for and twice because we have to replace the disposed of materials with new, more expensive ones.

This change will also necessitate immediate retraining for everyone who generates or manages hazardous waste and more frequent inspections to insure the changes are implemented. This creates a large time burden for everyone involved.

Please reconsider this change. Ignoring time and cost, new regulations should not make workers less safe. This change will make my job more hazardous!