

How to prepare for the upcoming RCRA hazardous waste audit:

1. Inspect all chemical and waste containers in your lab, and all areas where chemicals are stored or handled.
2. Ensure that all chemical and waste containers are labeled with the complete chemical name of the contents. Do not use generic labels such as “waste chromatography solvent” or “waste electrophoresis buffer;” exact chemical names must be used. Avoid abbreviations, acronyms, and chemical symbols. Examples: Waste mercuric chloride should be labeled “Waste mercuric chloride” not “Waste HgCl₂.” Waste ethanol should be labeled “Waste ethanol” not “Waste EtOH.”
3. If the contents is a mixture then label the container with the relative percentage of each major constituent. Example: Waste solvent that is a 60/40 mixture of phenol and chloroform should be labeled “Waste 60% phenol/40% chloroform” or “Waste 60/40 phenol/chloroform,” not “Waste phenol/chloroform.”
4. Label all waste containers with the word WASTE. If you plan to reuse the chemical you can label it “Used,” for example, methylene chloride used and re-used to extract biological samples can be labeled “Used methylene chloride.” Exception: Used oil is always labeled “Used oil” not “Waste oil,” unless it is contaminated.
5. Relabel all chemical and/or waste containers that have deteriorating or fading labels. If the label is completely deteriorated, missing, or unreadable, attempt to identify the contents, relabel with the chemical name and the word WASTE if the contents are a waste. If the contents are unknown then label the container as UNKNOWN WASTE CHEMICAL and submit to EHSO through the normal waste disposal procedure.
6. Transfer the contents of any container which is deteriorated, compromised, and/or leaking to a new container which is compatible with the chemical or waste and relabel the new container.
7. Advise all laboratory workers that chemical spills must be immediately cleaned up when they occur.
8. All waste containers must be kept closed except when waste is actively being added. It is not acceptable to leave the container open to air with a funnel in the opening.
9. All hazardous materials and hazardous waste must be segregated by hazard class (flammable/combustible; oxidizer; acid; base) to ensure that incompatible substances do not come into contact with each other in the event of a spill or release. Examples of incompatible materials are: oxidizers or water-reactive chemicals stored with flammable/combustible materials; acids and bases stored together; nitric or perchloric acid stored with organic acids. It is acceptable to store waste with material as long as they are compatible.
10. Designate a satellite accumulation area and move all hazardous waste to this area, ensuring that incompatible wastes are separated by barrier or distance (e.g., in a separate box). Flammable/combustible waste can be stored in a different location, e.g., in a flammable storage cabinet, to comply with the fire code.
11. Designate someone from the lab to be responsible for hazardous waste and ensure that they receive initial and annual refresher training from EHSO.
12. Review both the EHSO RCRA Compliance Check List, generated during EHSO internal audits, and the *Containers Checklist*, part of the protocol audit contractors will use to assess compliance. Please note that not all sections of the *Containers Checklist* may be applicable to satellite accumulation areas, specifically Sections D & E. Also note that other RCRA items will be addressed during the audit, and for more information on those requirements, see the EHSO RCRA Compliance Check List.

4. Containers Checklist - See #12 Above For More Information on Checklist

Section A - Use and Management (§§264/5.171)

Yes No

1. Are containers in good condition?

_____ _____

Section B - Compatibility of Waste With Container (§§264/5.172)

1. Is container made of a material that will not react with the waste which it stores?

_____ _____

Section C - Management of Containers (§§264/5.173)

1. Is container always closed while holding hazardous waste?
2. Is container not opened, handled, or stored in a manner which may rupture it or cause it to leak?

_____ _____

_____ _____

Section D - Inspections (§§264/5.174)

1. Does owner/operator inspect containers at least weekly for leaks and deterioration?

_____ _____

Section E - Containment (§264.175)

1. Do container storage areas have a containment system?

_____ _____

Section F - Ignitable and Reactive Waste (§§264/5.176)

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?

_____ _____

Section G - Incompatible Waste (§§264/5.177)

1. Are incompatible wastes or materials placed in the same containers?
2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?
3. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?

_____ _____

_____ _____

_____ _____

Section H - Closure (§264.178)

1. At closure, were all hazardous wastes and associated residues removed from the containment system?

_____ _____