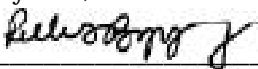


UCB Campus Policy

Topic: HAZARDOUS WASTE MANAGEMENT POLICIES,
GENERATOR TRAINING, COMPLIANCE VIOLATION AND
PENALTY ASSESSMENT

Date: January 15th, 1998

Approved by: 
Dr. Richard L. Byyny, Chancellor

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Distribution: Deans, Directors, Dept. Heads and Hazardous Waste
Generators

Policy Statement:

It is the policy of the University of Colorado at Boulder that all persons (faculty, student and staff) involved with the generation, handling and management of Hazardous Waste (HW) on Campus shall be properly trained and comply with all rules as specified by Federal and State regulations, permits and laws. HW Generators (HWGs) are responsible for training and management in their respective areas, as detailed below.

In the event that penalties are levied against the University for noncompliance with Local, State or Federal regulations, such penalties will be assessed, as appropriate, to the department(s) or unit(s) whose failure to comply with the campus policies, caused or contributed to the penalties. Departmental or unit indemnification requires that those handling HW have been properly trained and have adhered to University policies and procedures in accordance with Local, State and Federal regulations.

Purpose:

The Environmental Protection Agency and the Colorado Department of Public Health and Environment require annual HW classroom and on-the-job training for all persons who generate and handle HW. This includes personnel in Campus laboratories and shops, as well as some office personnel (who may generate waste copier toner, batteries etc.). Since there are thousands of HW Generators (HWGs) on the Boulder Campus, the task of formally training and retraining all of them is a significant challenge. In addition to training there are other requirements that need to be accomplished in every HW generating area, such as weekly inspections and record keeping.

Procedural Overview:

HW Generators (HWG) Training System:

The Campus has developed a Hazardous Waste (HW) Proctor system to expand the network of University resources and maintain environmental compliance and safety standards:

- Faculty and/or staff coordinators are appointed in each waste-generating Campus department and assign one or more HW Proctors to serve as training liaisons for the Environmental Health and Safety Division (EH&S) of the Department of Public Safety at UCB.
- EH&S trains each of the Proctors (using a train-the-trainer-approach), maintains documentation of the training presented to Proctors and provides training materials and compliance verification checklists and guidelines for use by every generator.
- HW Proctors, in turn, train HWGs in their areas. Proctors remain responsible for providing annual, formal training to individual faculty, student and staff HWGs (using EH&S prepared materials) and keeping records documenting such training.
- HWGs (faculty, student and staff) are responsible for proper management of hazardous waste and inspections in their assigned areas, using EH&S prepared checklists and Campus procedures and guidelines.
- EH&S also schedules monthly classroom training sessions for all HWGs that act as a 'safety-net' for smaller departments without Proctors or Generators urgently requiring training during a transitional stage or Proctor absence.

Your cooperation is required and appreciated in addressing this important Campus life-safety and environmental compliance issue. Questions regarding the implementation of this Policy should be directed to EH&S at 492-6025.