

Program Subject: Hazardous Materials & Spill Program

1. PURPOSE

- 1.1 To provide uniform procedures to be followed in the event of a hazardous wastes and materials spill.
- 1.2 To define the process for handling a minor or major hazardous wastes and materials release occurring on the University. The following statues provide the regulatory framework for management of hazardous waste:
 - 1.2.1 Resource Conservation and Recovery Act (RCRA), Subtitle C – (Regulations found in 40 CFR parts 260, 261, 262, 265, 266, 268, 270 and 270);
 - 1.2.2 Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) – (Regulations found in 40 CFR Parts 300, 302, 311, 355, and 370);

2. SCOPE

- 2.1 To establish the parameters within which hazardous materials and wastes are handled, stored and disposed of at the University of Wisconsin – Eau Claire.
- 2.2 To address administrative issues such as maintaining chemical inventories, storage, handling and use of hazardous materials, exposure monitoring, reporting requirements, specific responsibilities, and employee education programs.

3. RESPONSIBILITIES

- 3.1 Department of “Risk Management and Safety” (RM&S)
 - 3.1.1 Be responsible for ensuring the development and implementation of this policy.
 - 3.1.2 Provide necessary resources as available to carry out the program.
 - 3.1.3 Develop, maintain and manage this Hazardous Materials and Spill Program
 - 3.1.4 Provide information, guidance or assistance to University employees concerning hazardous waste determination, storage, disposal or training issues.
 - 3.1.5 Provide training on hazardous material handling and cleanup for minor spills (spill kits) annually.
 - 3.1.6 Assist employee(s) in minor spills if they request assistance.
 - 3.1.7 Work cooperatively with hazardous waste generators to address hazardous waste concerns that require corrective action(s).
 - 3.1.8 Conduct inspections of Hazardous Waste Storage Areas at the University.
 - 3.1.9 Pick up hazardous waste when requested and arrange for off-campus disposal.
 - 3.1.10 Maintain appropriate records required by this program.
 - 3.1.11 Periodically audits facility for Hazardous Waste Management Compliance.

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3.2 Supervisors

- 3.2.1 Ensure employee(s) is trained in proper handling of hazardous wastes and materials including:
 - 3.2.1.1 Minor spill clean-up procedures indicated in this policy.
 - 3.2.1.2 Proper emergency contact numbers and proper (PPE) to handle the chemical.
 - 3.2.1.3 Ensure employees are familiar with these procedures and revive any necessary training.
- 3.2.2 Ensure that (SDS) are accessible for all hazardous chemicals in the department.
- 3.2.3 Make an initial hazardous waste determination at the time waste is generated.
- 3.2.4 Conduct weekly Satellite Accumulation Area inspections and maintain records.
- 3.2.5 Notify (RM&S) if generating undetermined hazardous waste.

3.3 Employees

- 3.3.1 Understand the policy and procedure requirement of this document and any relevant chemical specific spill response procedures:
 - 3.3.1.1 Promptly and appropriately respond to chemical spills.
 - 3.3.1.2 Do not use chemicals if not adequately trained.
 - 3.3.1.3 Conform to good standard practices and procedures for the materials they work with by reviewing current available Safety Data Sheets and applicable department policies.
 - 3.3.1.4 Wear appropriate personal protective equipment.
 - 3.3.1.5 Participate in all required training programs.
 - 3.3.1.6 Report to the appropriate supervisor all facts pertaining to incidents resulting in releases of oil, and any action or condition that may cause an incident with oil and/or chemical.
 - 3.3.1.7 Generators will be responsible for the proper storage, control, use and disposal of all hazardous chemicals in their respective areas in accordance with this policy.

4. PROGRAM COMPONENTS

4.1 Spill Types

4.1.1 Minor Spills (< 1 gallon)

- 4.1.1.1 A minor spill is one that does not spread rapidly, does not endanger people or property except by direct contact, does not endanger the environment, and the workers in the area are capable of handling safely without the assistance of safety and emergency personnel.
- 4.1.1.2 A relatively small area is affected and only a relatively small number of personnel may need to leave the area until the spill is cleaned up.

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4.1.2 Minor Spills Clean Up Procedure

- 4.1.2.1 Notify fellow workers in vicinity of spill. Secure area, by restricting access and posting signs.
- 4.1.2.2 Gather and review safety information on spilled chemical. Review chemical's SDS for a hazard assessment and other pertinent information.
- 4.1.2.3 Locate an appropriate spill kit, if available. Wear appropriate PPE which usually includes chemical splash goggles, gloves, apron or lab coat.
- 4.1.2.4 Put absorbent from the spill kit on the material if the material spilled is in liquid form (and if this can be done safely).
- 4.1.2.5 Take appropriate action to remove the hazard.
- 4.1.2.6 Clean up spill using a scoop or other suitable item and place material in appropriate disposal container.
- 4.1.2.7 Decontaminate spill surface with mild detergent and water, as appropriate. Carefully remove PPE, place non-reusable items in disposal container and thoroughly wash hands.
- 4.1.2.8 Contact (RM&S) at (715)836-3999 for replenish spill kit and proper waste disposal.

4.1.3 Major Spills (> 1 gallon)

- 4.1.3.1 A large spill will be defined as more than 1 gallon and/or toxic fumes/vapors. An unmanageable spill is a situation in which an individual is not competent, untrained or simply unable to safely contain, clean up and dispose of the spill without risk to themselves or others.

4.1.4 Major Spills Clean Up Procedure

- 4.1.4.1 Staff in the affected area shall notify and evacuate fellow workers to a safe area. Post signs. **Note:** DO NOT attempt to clean a major spill.
- 4.1.4.2 Contact (RM&S) at (715)836-3999 and/or call University Police at 911 (715-836-2222) and give details of spill including specific location, chemical, quantity, and if anyone is injured.
- 4.1.4.3 In case of an injury or chemical contamination:
 - a. Wear PPE and move victim from spill area.
 - b. Locate nearest emergency safety shower or eyewash.
 - c. If hazardous materials are splashed in the eyes, flush the eyes immediately with water, using an eyewash station for at least 15 minutes.
 - d. If the skin becomes contaminated with hazardous materials, wash the affected area thoroughly with copious amounts of water. Remove grossly contaminated clothing immediately. If available, use an emergency shower for at least 15 minutes. Place contaminated clothing in a plastic bag and contact (RM&S) at (715)836-3999 for disposal.

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4.2 General Spill Kit Contents

4.2.1 An effective spill kit must be properly stocked, strategically located and its location known to all personnel. In addition, it should be checked periodically, and restored after each use. The following is a list of recommended items that should be contained in a chemical spill kit. However, it is important that spill kits be tailored to meet the specific spill control needs of each shop.

- 4.2.1.1 1 – Container 2lbs. of baking soda (sodium bicarbonate) to be used for small acetic chemical spills.
- 4.2.1.2 1 – Container 1.5lbs. of Activated Carbon to be used for small solvent/alcohol chemical spills.
- 4.2.1.3 1 – Container 3lbs. of Oil Dry (Clay) to be used for small petroleum products spills.
- 4.2.1.4 2 – 4 Foot Absorbent booms for petroleum products or controlling then spread of a spill.
- 4.2.1.5 3 – Pairs of Nitrile Disposable Gloves.
- 4.2.1.6 2 – 9211 Dust Masks.
- 4.2.1.7 2 – Bio-Hazard Red Disposable Bags with ties.
- 4.2.1.8 3 – Heavy weight plastic disposal bags with ties.
- 4.2.1.9 2 – Pairs of Safety Glasses.

4.3 Storage

- 4.3.1 Spill Kits should be stored in an easy to access location, away from other chemicals and preferably not below sinks.
- 4.3.2 All spill kit supplies should be assembled together in one area and clearly marked to restrict their use for spill response only.

4.4 Damage Packages – The following steps should be taken when handling damage or a leaking package:

- 4.4.1 Put on gloves to prevent hand contamination
- 4.4.2 Visually inspect package for any sign of damage (e.g. wetness, crushed).
- 4.4.3 If damage is noted, surround package with absorbent, get SDS for that specific chemical, and notify the immediate supervisor
- 4.4.4 Place leaking package in another box and seal
- 4.4.5 Place sealed box in plastic bag and seal bag.
- 4.4.6 Place entire package in an outer carton for return to sender or for proper disposal
- 4.4.7 Safe clean up procedures for each chemical leaks or spills in accordingly to the following sections:
 - 4.4.7.1 If it is a minor spill, use the Minor Spill Clean Up procedures in section 4.1.2.
 - 4.4.7.2 If it is a major spill, use the Major Spill Clean Up procedures in section 4.1.4.
- 4.4.8 If an employee has been exposed to the leaking material, wash the affected area for 15 minutes, and then contact immediate supervisor for additional medical follow up.

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4.5 Mercury Containing Lamp:

4.5.1 Requirement – Once mercury-containing lamps have been removed from service proceed with the following:

4.5.1.1 Place all mercury-containing lamps in the designated storage areas.

4.5.1.2 Storage area must be identified with an easily readable sign stating “WASTE MERCURY-CONTAINING LAMP STORAGE”.

4.5.1.3 Label each box as “Universal Waste-Lamps”. Labels can be obtained from the Office of Custodial Services Department (715-836-5246).

4.5.1.4 Label each box with the accumulation start date (the date the first waste lamp is placed into the box).

4.5.1.5 Contain any lamp that shows evidence of leakage, spillage or damage. The container must be closed, structurally sound and compatible with the contents of the lamps.

4.5.1.6 Stack boxes of lamps **five feet** in height or less.

4.5.1.7 Conduct a monthly inspection of the lamp storage area and document on the inspection log (See **Appendix A**). The inspection log should contain check marks by the items listed, inspector’s name, date, and time of inspection. The inspection logs should remain at the storage location.

4.5.2 Waste Lamp Management – If a mercury-containing lamp breaks, the material must be managed as hazardous waste.

4.5.2.1 Waste lamps should be placed in the designated drum/seal container in the lamp storage area.

4.5.2.2 Label the container as “Universal Waste-Lamp(s)”.

4.5.2.3 Store waste-lamp for no longer than one (1) year from the date waste is first placed in a container.

4.5.2.4 Ensure the container is “closed” except when adding waste.

4.5.2.5 Ensure communication equipment and emergency equipment is available where hazardous wastes are managed.

4.6 In house Transport Lead Acid Batteries

4.6.1 Inspection

4.6.1.1 Upon arrival, check the battery for visible damage such as cracks, dents, deformation and other visible abnormalities.

4.6.1.2 Verify connections, assure that they are clean. If the battery is dirty, or if any minor amount of acid has spilled onto the case, check with Vehicle Maintenance if it is necessary to remove it.

4.6.1.3 Any fluid on or around the battery could indicate damage or improperly sealed case.

4.6.1.4 In the event of leak or damage please contact Vehicle Maintenance or return to the retailer.

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- 4.6.2 Precautions for safe transporting
 - 4.6.2.1 Employees should not transport any leak or damage lead acid battery into a different work area such as Vehicle Maintenance.
 - 4.6.2.2 Employees shall only transport new battery with a properly sealed case, no visible leak or fluids on it. When transporting lead acid battery to Vehicle Maintenance, employee should follow the following safe procedures:
 - a. Place the battery on the flat cart and keep it in an upright position.
 - b. Lead acid batteries are extremely heavy and proper lifting procedure must be used to avoid personal INJURY. It is recommended steel shoes be worn when transporting or working around a battery.
 - c. Hand hygiene – always practice good hygiene and wash your hands after handling a battery.
 - d. All employees, who will transport the lead acid battery, should receive the Hazard Communication with GHS training.
- 4.6.3 Precautions for safe handling and storage
 - 4.6.3.1 Keep containers tightly closed when not in use.
 - 4.6.3.2 If battery case is broken, avoid contact with internal components.
 - 4.6.3.3 Do not handle near heat, sparks, or open flames.
 - 4.6.3.4 Protect containers from physical damage to avoid leaks and spills.
 - 4.6.3.5 Do not allow conductive material to touch the battery terminals. A dangerous short-circuit may occur causing battery failure and fire.
 - 4.6.3.6 Never lean over a battery while boosting, testing or charging it.
 - 4.6.3.7 Freezing temperatures may cause spent batteries' cases to crack.
 - 4.6.3.8 Storage areas should be sealed with an acid-resistant material and have a containment berm.
 - 4.6.3.9 Piles of lead-acid batteries that are being stored on pallets should not be stacked higher than three feet, and the piles should be covered and stored with an enclosed area.
 - 4.6.3.10 At a minimum, wear safety glasses and wear gloves that are acid-resistant and follow the proper spill clean-up procedures in section 4.1.2.
- 4.6.4 Lead Acid Battery Spills
 - 4.6.4.1 Use proper Personal Protective Equipment when handling a small spill or a leaking battery (for more information, contact (RM&S) at 715-836-3999.
 - 4.6.4.2 If battery acid leaks into a secondary containment:
 - a. Double-bagged the leaking battery in six-millimeter polyethylene plastic bags.
 - b. Clean the spilled battery acid with rags or disposable wipes and appropriate absorbent.
 - c. Manage the clean-up material as hazardous waste by placing it in an acid debris waste accumulation container provided by the department of Risk Management & Safety.

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- d. If the work area does not have an acid debris hazardous waste accumulation container:
 - o Place the battery acid clean-up materials in a small pail or polyethylene plastic bag.
 - o Label the pail or plastic bag as hazardous waste.
 - o Call the (RM&S) to remove the spill clean-up material as soon as possible.
- e. Clean-up debris would also contain lead and would have to be managed as such, not just as an acidic waste.
- 4.6.4.3 Wear appropriate Personal Protective Equipment (PPE)
 - a. Safety glasses (non-fogging) with side shields, goggles, or face shields.
 - b. Chemical protective gloves (Provide excellent protection against chemical splashes, and resist nicks, cuts and abrasions).
 - c. Face mask approved for light sanding (N95/NIOSH approved).
 - d. Safety Shoes and Aprons – acid resistant.
- 4.7 Asbestos General Industry Standard
 - 4.7.1 House Keeping: Custodial staff should use the following safe work practices to clean floors and other horizontal surfaces in areas that may contain asbestos such as buildings built before 1980, unless asbestos containing material has been removed.
 - 4.7.1.1 Use Wet Methods of cleaning floors made of vinyl asbestos tile.
 - a. Dry sweeping and dry buffing of unsealed floors and scraping of all floors should be avoided.
 - b. Use low abrasion pads at speed below 300RPM and wet methods to strip finish
 - 4.7.1.2 Wet cleaning and/or HEPA vacuums should be used to clean mechanical room floors. If HEPA vacuums are used, they must be used and emptied in a manner that minimizes re-entry of asbestos fibers into the workplace.
 - 4.7.2 Storage Area
 - 4.7.2.1 Only asbestos waste may be stored in the designated asbestos storage area.
 - 4.7.2.2 The area designated for asbestos storage must be secured from unauthorized access and clearly marked.
 - 4.7.2.3 Asbestos waste shall not be removed from the storage area except to prepare the waste for transport to an authorized disposal facility.
 - 4.7.2.4 All asbestos materials shall be stored in plastic bags or otherwise packaged in a manner that will prevent generation or release of asbestos fibers, and shall be properly labeled.
 - 4.7.2.5 On rare occasions, it may be necessary to enter an asbestos waste container to remediate a discrepancy. Entry into any asbestos waste container (bins, dumpster, etc.) shall require gloves and respirator (N95/NIOSH approved).
- 4.8 Storage locations for Universal Waste/Hazardous Waste/Sharps Secure Cabinet/Spill Kits will be identified throughout the University as applicable.

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5. TRAINING

- 5.1 This training does not qualify team members to provide emergency response to large spills or threats of large spills. It only allows employees to respond to incidental release of hazardous substances in their work sites which do not pose a significant safety or health hazard to employees in the immediate vicinity or to the employee cleaning it up.
- 5.2 The spill(s) may be cleaned up by employee(s) who are familiar with the hazards of the chemicals with which they work with. All employees on site will be trained in the contents of the site-specific spill prevention and response plan during their annual refresher training and periodically throughout the duration of the job. Training will cover the following:
 - 5.2.1 To ensure safe handling procedures are both known and understood by all concerned.
 - 5.2.2 To ensure workers learn how to read the (SDS), understand the information provided in the SDS and chemical labels, where to find important information, understand the risks of exposure and ways to protect them.
 - 5.2.3 To ensure workers know how to get help if a spill is encountered.
 - 5.2.4 To ensure workers know the size of the spill they can clean up under this plan.
 - 5.2.5 To ensure workers know the locations of spill cleanup materials and PPE.
 - 5.2.6 To ensure worker know how to store waste and properly dispose of them.

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Appendix A Monthly Inspection Checklist

Waste Mercury-Containing Lamp Storage Area Inspection Checklist

Inspection Items	Monthly Inspection Check											
	1	2	3	4	5	6	7	8	9	10	11	12
All containers marked as "UNIVERSAL WASTE LAMPS"												
Accumulation start date recorded on label												
Containers have not been stored longer than one year												
All full boxes are sealed with tape around the box openings												
Boxes and lamps are free from leakage, spillage or damage												
Boxes are not stacked greater than 5 feet high												
All labels visible and legible												
Inspector's Initial:												
Comments:												
Inspector's Name:						Date of Inspection:						
<p>Note:</p> <ul style="list-style-type: none"> o Each month inspect the waste mercury-containing lamp storage area, checking off the inspection items. Completed checklists should be retained in the plastic sleeve. o Anyone completing this form and all employees occupationally exposed to waste mercury-containing lamps are required to attend the Hazard Communication with GHS training. o It is a recommendation for Custodian Services Department personnel to do the inspection monthly. o Need this Inspection form contact Safety Coordinator. He will also do the visual inspection monthly. 												