



HAZARDOUS WASTE & YOUR SCHOOL

U.S. Environmental Protection Agency

Region 1

Did you know?

➡ There are many programs and operations at schools which may generate hazardous wastes. They include (but are not limited to):

- | | |
|------------------------|----------------------|
| ✓ science laboratories | ✓ cosmetology |
| ✓ facility maintenance | ✓ auto body shop |
| ✓ graphic arts | ✓ plumbing & heating |

➡ Hazardous wastes are required to be handled properly from their initial point of generation (cradle) to their ultimate point of disposal (grave).

➡ If you generate, store or offer for transport hazardous wastes from your school you are required to notify the VT Department of Environmental Conservation in order to obtain a site-specific RCRA identification number. When you notify VT DEC you will be assigned a permanent site-specific RCRA identification number to use on all forms tracking the shipment of your wastes off-site. Permanent site-specific RCRA identification numbers begin with VTD, VTR or VT5, followed by nine digits.

➡ If you routinely generate hazardous wastes (as most schools do), you should *not* be obtaining temporary identification numbers each time you ship wastes off-site. Instead, you should have a permanent site-specific RCRA identification number. (Temporary identification numbers begin with VTP, followed by nine digits.)

➡ If you do not have a permanent site-specific RCRA identification number, but regularly have hazardous wastes on-site, you need to calculate the quantity of hazardous wastes your school generates each month and to inventory the total accumulation of hazardous waste on-site. This information will be the basis for your RCRA generator category. How much hazardous waste you can keep on-site and how long you can accumulate it will depend on this categorization.

➡ Each individual program or activity conducted at your school may generate quantities of hazardous wastes under the reporting threshold, but when added together, the school may still fall into a category required to obtain a site-specific RCRA identification number.

➡ The more hazardous wastes you have at your school, the more regulations you are required to comply with! That's why it makes sense to limit the amount of wastes you generate or store.

If you are not sure whether you have hazardous wastes on-site, refer to the back page of this notice for a description of some of the types of wastes that are regulated as hazardous.



How do you know if you have hazardous waste?

A waste may be hazardous either because it is listed in the regulations or because it is defined as **hazardous by its characteristics**. The characteristics that make a waste hazardous include:

Ignitability (easily catches fire, for liquids, a flash point < 140 degrees F)

Corrosivity (easily corrodes materials or human tissue, very acidic or basic, pH ≤ 2 or ≥ 12.5)

Reactivity (explosive, produces toxic gases when mixed with water or acid); and

Toxicity (can leach toxic chemicals as determined by a special laboratory test).

Material Safety Data Sheets are supplied by distributors when chemicals are purchased. These MSDS sheets are often useful in determining the chemical properties of the wastes you have at your school.

Solvents such as trichloroethane and trichloroethylene are examples of listed hazardous wastes which may be generated by various activities at your school such as cleaning, painting or facility maintenance. A complete inventory of the "listed hazardous wastes" is contained in the RCRA hazardous waste regulations.

Where can you go for help?

If you have questions about how environmental regulations apply to your school contact US EPA New England staff:

Joan Jouzaitis: (617) 918-1846, jouzaitis.joan@epa.gov

Lee Fiske: (617) 918-1847, fiske.lee@epa.gov

US EPA

One Congress Street, Suite 1100 (SPN)

Boston, MA 02114-2023

For more information about the RCRA hazardous waste regulations or for help in obtaining a site-specific EPA identification number contact:

Waste Management Division

Vermont Department of Environmental Conservation (DEC)

103 South Main Street/West Office Building

Waterbury, VT 05671-0404

VT DEC Hazardous Waste Management Program: <http://www.anr.state.vt.us/dec/wastediv/rcra/rcrahome.htm>

EPA NEW ENGLAND: <http://www.epa.gov/ne>