



ENVIRONMENTAL HEALTH AND SAFETY
STANDARD OPERATING PROCEDURES

SOP No. 24.01.01.W1.04AR Hazardous Material and Hazardous Waste Identification Procedure

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Environmental Health and Safety at WTAMU is composed of two distinct but integrated environmental safety departments that report to the Vice President of Research and Compliance. Academic and Research Environmental Health and Safety (AR-EHS) is responsible for research and academic related compliance, which includes laboratory and academic research and the associated compliance committees. Fire and Life Safety (FLS-EHS) is responsible for fire related compliance and conducts fire and life safety inspections of campus buildings and assists with the testing all fire detection and suppression systems.

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Supplements TAMUS Regulation 24.01.01

1. Purpose

This procedure outlines the requirements and methods to be used to determine if a material or a waste must be classified as hazardous.

If a question exists as to the classification of a material or waste as hazardous, the WTAMU Environmental Health and Safety office (EHS) will make the final determination.

EHS faculty and staff can request pickup of hazardous materials that are waste or no longer needed by contacting EHS office. EHS will either enter the reusable material into the excess chemical log or characterize the waste and make arrangements for disposal.

2. Scope

This procedure applies to all departments of West Texas A & M University (WTAMU) that use

hazardous materials or that generate hazardous wastes.

Each department of WTAMU will determine the hazardous materials used by the department. A master list of materials used will be kept by the department. The department will forward a copy of the hazardous materials list to Environmental Health and Safety (EHS). It is the responsibility of the department to keep the department master list and EHS copy up to date.

It is the responsibility of the user of any new material or chemical to determine if the material is listed with the department and EHS. If the material or chemical is not listed with the department, the user **MUST** ensure that the material is **NOT** hazardous. If the material is hazardous, then it must be listed by the department and EHS before permission to use the chemical can be given.

3. Procedure

3.1. Hazardous materials (Hazmat)

- A material is considered hazardous if a reasonable individual believes the material can cause harm to the environment or to the health of an individual.
- The material can be of solid, liquid, or gaseous form.
- The physical hazard, as well as the chemical or toxicity hazard presented by the chemical, must be used to evaluate the class of material. Examples might include gasses under pressure.
- A chemical which has a warning or caution statement about a health or environmental issue in the label or Safety Data Sheet (SDS) formally known as Material Safety Data Sheet the chemical will be considered a hazardous material (HAZMAT).

3.2. Hazardous Waste (hazwaste)

A person who generates a solid waste must determine if that waste is hazardous using the following method.

1. Determine if the material is excluded from being a solid waste or hazardous waste per 30 TAC §335.1 of the Texas Administrative Code (TAC) [40 Code of Federal Regulations §§261.2, 261.3, or 261.4].
2. If the material is a solid waste, determine if the waste is listed as, mixed with, or derived from a listed hazardous waste identified in 40 Code of Federal Regulations (CFR) Part 261, Subpart D.
3. If the material is a solid waste, [For purposes of complying with 40 CFR Part 268 or if the waste is not listed as a hazardous waste in 40 CFR Part 261, Subpart D, he or she must then] determine whether the waste exhibits any characteristics of a hazardous waste as identified in 40 CFR Part 261, Subpart C. [, by either:] Texas Commission on Environmental Quality Page 281 Chapter 335 - Industrial Solid Waste and Municipal Hazardous Waste Rule Log No. 2000-044-335-WS.

This can be done by

- a. Testing the waste according to methods set forth in 40 CFR Part 261, Subpart C, or according to an equivalent method approved by the administrator under 40 CFR §260.21.
- b. Applying knowledge of the hazardous characteristic of the waste in light of the materials and/or process used to generate the waste, pursuant to §335.511 of this title (relating to Use of Process Knowledge).

- c. If the waste is a used oil, determine whether used oil is a listed hazardous waste per 40 Code of Federal Regulations §261.3(a)(2)(v). Used oil made hazardous by mixing with listed or characteristically hazardous waste is regulated as hazardous waste under the TAC.

4. Record Retention

No official state records may be destroyed without permission from the Texas State Library as outlined in [Texas Government Code, Section 441.187](#) and [13 Texas Administrative Code, Title 13, Part 1, Chapter 6, Subchapter A, Rule 6.7](#). The Texas State Library certifies Agency retention schedules as a means of granting permission to destroy official state records.

West Texas A & M University Records Retention Schedule is certified by the Texas State Library and Archives Commission. West Texas A & M University Environmental Health and Safety will follow [Texas A & M University Records Retention Schedule](#) as stated in the Standard Operating Procedure [61.99.01.W0.01 Records Management](#). All official state records (paper, microform, electronic, or any other media) must be retained for the minimum period designated.

5. Training

West Texas A & M University Environmental Health and Safety will follow the Texas A & M University System Policy [33.05.02 Required Employee Training](#). Staff and faculty whose required training is delinquent more than 90 days will have their access to the Internet terminated until all trainings are completed. Only Blackboard and Single Sign-on will be accessible. Internet access will be restored once training has been completed. Student workers whose required training is delinquent more than 90 days will need to be terminated by their manager through Student Employment.

Related Statutes, Policies, or Requirements

Contact Office

WTAMU Environmental Health and Safety
(806) 651-2270