TEXAS WOMAN'S UNIVERSITY™

Regulated Waste Program

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Office of Environmental Health & Safety

940-898-4001 option 3

risk@twu.edu

https://twu.edu/health-safety

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TEXAS WOMAN'S UNIVERSITY

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I. INTRODUCTION

The purpose of this document is to inform faculty, staff, and students at Texas Woman's University (TWU) of Federal and State waste disposal regulations and to define the TWU Regulated Waste Management Program. This program applies to all TWU operations and is promulgated pursuant to TWU's University Regulations and Procedures Policy 04.430: Environmental Health and Safety.

The Federal Resource Conservation and Recovery Act of 1976 (RCRA) sets strict standards for the "cradle-to-grave" management of hazardous wastes. These standards are written and enforced by the U. S. Environmental Protection Agency (EPA). The EPA has delegated to the Texas Commission on Environmental Quality (TCEQ) the responsibility of tracking hazardous waste generation and disposal within the state of Texas. Hazardous wastes must be shipped by licensed waste transportation companies to permitted treatment, storage, and disposal facilities (TSDF). The regulations require that the generator maintain detailed documentation concerning the generation, composition, and fate of all hazardous wastes. In 1984, the Hazardous and Solid Waste Amendments (HSWA) to RCRA tightened the hazardous waste rules. It also brought the concept of waste minimization to the forefront as the preferred method of controlling hazardous waste production.

In order to comply with the various environmental laws, good safety practices, and to avoid future liabilities, the University will follow a conservative approach in the handling of all hazardous materials and wastes produced on campus. The person, laboratory, shop, studio, or any other work area that produces an unwanted material is responsible for ensuring that the material is properly identified, handled, and labeled in accordance with this program. TWU's Office of Environmental Health & Safety (EHS) is charged with overseeing the program and ensuring that all regulated wastes generated on campus are disposed of in a proper and responsible manner.

TWU's Denton campus is classified as a "Small Quantity Generator" (SQG) of hazardous waste, the Dallas and Houston campuses are classified as "Very Small Quantity Generators" (VSQG), and all campuses are considered "Non-industrial facilities." All campuses must comply with the State and Federal regulations for waste disposal associated with their respective classifications.

Generally, as a SQG, a generator must:

- Notify the TCEQ and EPA of hazardous waste generation
- Identify all hazardous waste generated
- Send the hazardous waste to an approved hazardous waste facility
- Store hazardous waste no more than 180 days
- Generate no more than 1 kg of acute hazardous waste or 2,200 lbs. (1,000 kg) of non-acute hazardous waste in a calendar month
- Not accumulate more than 13,200 lbs. (6000 kg) of hazardous waste on site at any time
- Submit annual summary reports to the State of Texas

Generally, as a VSQG, a generator must:

- Identify all hazardous waste generated
- Not accumulate more than 2,200 lbs. (1000 kg) of hazardous waste on site at any time
- Send the hazardous waste to an approved hazardous waste facility

Both the TCEQ and the US Environmental Protection Agency (EPA) have the authority to inspect TWU's hazardous waste management program for compliance.

All hazardous or otherwise regulated waste must be transported to an authorized off-site facility for further storage, treatment, and/or disposal. It is illegal to dispose of hazardous chemical waste by dilution, evaporation, or dumping it into the sanitary sewers, storm water drains, or into the local landfill. EHS personnel will collect, transport, and store hazardous chemical waste on campus prior to final disposal. In addition, EHS will provide technical information and assistance to individual generators and maintain permanent records of all hazardous chemical waste transportation and disposal.

II. DEFINITIONS

Acute Hazardous Waste – Waste that contains such dangerous chemicals that it could pose a threat to human health and the environment even when properly managed. These wastes are fatal to humans and animals even in low doses.

Very Small Quantity Generators (VSQG) – Any generator that generates 220 lbs. (100 kilograms) or less of hazardous waste per month, or 2.2 lbs. (1 kilogram) or less of acutely hazardous waste per month.

Central Accumulation Area – Sites designated by TWU EHS to be used for the storage of hazardous wastes prior to shipment to authorized disposal facilities.

EPA Identification Number – The number assigned by the Environmental Protection Agency to each generator, transporter, and processing, storage, or disposal facility.

Episodic Event – An activity or activities, either planned or unplanned, that does not normally occur during generator operations, resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category.

Generator – Any *person*, by site, who produces hazardous waste or industrial solid waste; any person who possesses hazardous waste or industrial solid waste to be shipped to any other person; or any person whose act first causes the solid waste to become subject to regulation. *Person* refers to an individual, trust, firm, corporation, Federal Agency, State, political subdivision of a State, municipality, or any interstate body.

Hazardous Material – Any substance or material which has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and which has been so designated.

Hazardous Waste - Any solid waste material listed or identified in Title 40 Code of Federal Regulations, Part 261, Subpart C and D or exhibiting the characteristics of ignitability, corrosivity, reactivity, or toxicity, also defined in Part 261.

Industrial Solid Waste - Solid waste resulting from or incidental to any process of industry or manufacturing, or mining or agricultural operation, which may include "Hazardous waste" as defined in this section.

Large Quantity Generators (LQG) – Any generator that generates more than 2,200 lbs. (1,000 kilograms) of hazardous waste per month.

Manifest – A legal document containing required information which must accompany shipments of Hazardous Waste or Texas Class 1-Industrial Solid Waste transported on public roads or thoroughfares.

Mixed Waste – A radioactive waste that is also a hazardous waste.

Planned Episodic Event - An episodic event that the generator planned and prepared for, including regular maintenance, tank cleanouts, short-term projects, and removal of excess chemical inventory.

Recyclable Materials - Wastes that are recycled. Recycled material is used, reused, or reclaimed.

Reclaimed Material - Material that is processed or regenerated to recover a usable product. Examples include recovery of lead from spent batteries or regeneration of spent solvent.

Satellite Accumulation Area – An area, system, or structure used for temporary accumulation of hazardous waste prior to transport to a central accumulation area. For an area to be considered to be a satellite accumulation area, the area must be at or near the point of generation, and under the control of the person generating the waste.

Small Quantity Generators (SQG) – Any generator that generates more than 220 lbs. (100 kilograms), but less than 2,200 lbs. (1,000 kilograms), of hazardous waste per month.

Solid Waste – Any garbage, refuse, sludge from a waste treatment plant, water treatment plant, or air pollution control facility or other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, municipal, commercial, mining and agricultural operations, and from community and institutional activities.

Storage – The holding of solid waste for a temporary period, at the end of which the waste is processed, disposed of, recycled, or stored elsewhere.

Transporter – Any person who conveys or transports municipal hazardous waste or industrial solid waste by truck, ship, pipeline, or other means.

Universal Waste – Any hazardous waste subject to 40 CFR Part 273 and TAC 335.261, to include:

A. ***Batteries*** including lead-acid that are not managed under 40 CFR 266, Subpart G
B. ***Pesticides*** managed as part of a waste pesticide program
C. ***Mercury***-containing equipment (such as thermometers and thermostats)
D. ***Lamps*** (e.g. fluorescent, mercury vapor, sodium vapor, and metal halide)

E. ***Paint and Paint-related Material*** in accordance with TCEQ regulations

Unplanned Episodic Event – An episodic event that the generator did not plan or reasonably did not expect to occur, including production process upsets, product recalls, accidental spills, or "acts of nature," such as tornado, hurricane, or flood.

Used Oil - Used oil is oil derived from crude or synthetic oil which has been used as a lubricant, coolant, heat transfer, or hydraulic fluid, or similar; and has become contaminated through use.

Waste – Any material for which there is no use and is to be discarded as valueless.

III. HAZARDOUS/REGULATED WASTE DISPOSAL PROGRAM

Individuals or departments generating wastes are responsible for following this procedure, including properly identifying the wastes generated with assistance from EHS, and for assuring that their employees are trained in and follow proper waste procedures. The following procedures are intended to assure compliance with applicable Federal and State regulations for the proper management of hazardous/regulated wastes and to reduce adverse effects to human health and the environment.

IV. HAZARDOUS WASTE DETERMINATION

Prior to disposal of any wastes, generators (with assistance from EHS) must determine whether the material meets the definition of a hazardous or other regulated waste.

A material is "hazardous waste" if it meets one or more of the following:

- It is a pure (or sole active ingredient), unused commercial chemical product listed on the P or U list of the EPA Hazardous Waste Lists
- It is waste from common industrial processes listed on the F list of the EPA Hazardous Waste Lists
- It is a mixture or solution containing a listed waste and a non-hazardous chemical
- It has one or more of the following characteristics:
  - Ignitability (i.e. flammable) – waste code D001 (flashpoint <140°F; a solid under standard temperature and pressure that is capable of causing fire through friction, absorption, or moisture and, when ignited, burns so vigorously and persistently it creates a hazard; is an ignitable compressed gas; is an oxidizer)
  - Corrosivity – waste code D002 (pH ≤2 or ≥12.5 for aqueous solutions, or the ability to corrode steel)
  - Reactivity – waste code D003 (e.g., responds violently to air or water, cyanides, explosives, unstable chemicals)
  - Toxicity - waste codes D004-D043 (wastes that contain chemicals identified in the EPA Hazardous Waste Toxicity Characteristic List in concentrations above certain regulatory limits. The concentration of these chemicals in a waste is determined through the "Toxicity Characteristic Leaching Procedure" or TCLP)

Electronics are commonly overlooked as potential hazardous waste. Electronics regularly fail the TCLP testing due to the solder and other circuit board components. Therefore, TWU will assume that electronics are hazardous unless TCLP testing is conducted. However, many of the hazardous waste management rules do not apply to materials that are sent for recycling/reclamation. Contact EHS for additional assistance.

V. OTHER REGULATED WASTE

Even if a material is not determined to be a hazardous waste under EPA regulations, it may be regulated under Texas regulations or local landfill disposal prohibitions and need to be disposed of through a licensed facility. Applicable wastes Texas regulates include the following:

- Containers that contained hazardous/regulated waste greater than 5 gallons in size that have not had all residues removed and rendered unusable
- Asbestos-containing material
- Polychlorinated biphenyls (PCBs)
- Some petroleum wastes containing more than 1,500 ppm of total petroleum hydrocarbons
- Solids that might cause fires or pose other hazards
- Wastes containing toxic chemicals over certain Texas-specific thresholds (via TCLP testing), found in Title 30 Texas Administrative Code 335.521 Appendix 1 Table 1

Texas classifies waste otherwise unclassified by the federal regulations as Class 1, 2, & 3 for industrial generators; Class 1 has the highest health and/or environmental risk, and Class 3 has the least. Although TWU is non-industrial, we classify and dispose of our waste voluntarily under these regulations as they are more stringent and protective of the environment.

In addition, waste streams that are non-hazardous and not regulated under the Texas rules, but contain any free liquids, are not permitted to be disposed of as municipal waste (i.e. normal trash) and must be disposed of through EHS.

VI. GENERAL REQUIREMENTS

Most waste materials fall under the applicable waste regulations as soon as they are generated. Generally, unused products become a "waste" when the individual generator determines that it is no longer useful and should be discarded. However, unused commercial chemical products may be deemed “abandoned” (and thus waste) by regulators depending on their management, viability, need, etc. For example, old, illegible containers with crystals forming on the outside of the container may be considered waste if the lab cannot demonstrate they are still using the chemical, whether it is viable, etc. Contact EHS if you have old, unwanted chemicals for disposal.

Non-hazardous/non-regulated waste may be disposed of using the sanitary sewer or regular trash, but only after consultation with EHS.

Hazardous chemicals can be treated to reduce the hazard or the quantity of waste in the laboratory **ONLY IF** the treatment procedure is a **necessary component** of the experimental protocol and the material is not a waste yet. Otherwise, the chemicals must be disposed of as is and treatment is not allowed.

Gas cylinders should be returned to the manufacturer or distributor whenever possible. Contact EHS for disposal of non-returnable cylinders as hazardous waste.

Photographic processing waste containing silver (generally the fixer waste) must be disposed as hazardous waste. Alternately, the fixer waste can be treated to remove the silver from the waste prior to discharge into the sanitary sewer (contact EHS for assistance). Photographic lab effluent that does not contain silver and is not otherwise hazardous/regulated may be discarded via the sanitary sewer system.

“Mixed Waste" (includes both radioactive material and hazardous chemicals) will be initially routed through the Radiation Safety Officer.

Hazardous/regulated waste which is also a biomedical waste must be disposed of in accordance with both this procedure and the Biohazardous Waste Procedures.

VII. CLASSIFICATION AND SEGREGATION OF HAZARDOUS WASTE

All hazardous waste that is generated in the work area shall be immediately classified upon generation and segregated according to the hazard class and type of chemical waste.

Hazardous waste can be divided into the following broad hazard classes, but must be segregated according to compatibility regardless of the class (e.g. some acids should not be stored together):

- Halogenated solvents (e.g. methylene chloride, chloroform, carbon tetrachloride)
- Non-halogenated solvents (e.g. xylene, toluene, alcohols)
- Acids
- Bases
- Heavy metals (e.g. arsenic, barium, chromium, selenium, silver, cadmium, lead, mercury)
- Poisons/highly toxic (inorganic or organic)
- Reactives (e.g. cyanides, sulfides, water reactive chemicals, peroxides, explosives)
- Petroleum oil
- Paint and Paint Related Material

Different classes of hazardous waste must not to be disposed of in the same waste container unless combination of the chemical waste is a necessary part of the process generating the waste. Segregate waste containers according to their compatibility with one another.

Do not combine inorganic heavy metal compounds and organic waste solvents. Do not combine non-hazardous waste with hazardous waste.

Dry materials (paper, rags, towels, gloves, KimWipes™, etc.) contaminated with flammable or toxic chemicals must be treated as hazardous waste. Do not use **biohazard bags**, unless the waste is actually biomedical waste (refer to the Biohazardous Waste Procedures).

Peroxide formers and other unstable wastes may require special handling. Old containers of peroxidizable chemicals or those with visible discoloration, cloudiness, crystallization, wispy structures, oily layers, or stratification should be treated as potentially explosive. See the TWU Chemical Hygiene Plan for peroxide forming chemical handling specifics.

A. Unknown Chemical Wastes

All waste generators and chemical users are responsible for knowing the contents of all containers in their work areas. This includes properly labeling all waste containers and requesting their removal in a timely manner to avoid the generation of unknown wastes. If you have an unknown chemical waste that needs to be removed, you should:

1. Try to identify the contents by asking other researchers, shop personnel, or users in your work area if they know who produced the waste or what it is.
2. If you cannot find the original generator, attempt to narrow down the potential sources of generation to share with EHS.
3. If you have exhausted all available information and still cannot identify the waste, you may submit it as an unknown.

EHS will attempt to categorize the waste and pay for a specialist to categorize the waste, as necessary. Unknown wastes often require special handling procedures and may not be acceptable for standard removal depending on the container's condition, source, and other factors.

VIII. CONTAINMENT AND STORAGE OF HAZARDOUS WASTE

All containers used for hazardous waste must be constructed of appropriate material and all containers must be stored properly.

Individual waste generators shall assure that their hazardous wastes are accumulated in safe, transportable containers, properly labeled (see below), and stored to prevent human exposure or environmental release of the waste materials.

Waste generators shall provide their own waste containers that are **compatible with the chemical contents (e.g., do not use metal containers for corrosive waste or plastic containers for organic solvent)**. Containers must be in good condition and not leak. All containers must have suitable screw caps or other means of secure closure. When large waste containers (>10 gallons, total volume) are required, contact EHS for assistance on selection and placement of appropriate container type and size.

If reusing empty containers for waste, they must not have contained incompatible materials. The original label must be removed, covered up, or clearly marked out, and have a completed hazardous waste label attached.

Never overfill hazardous waste containers. Expansion and excess weight can lead to spills, explosions, and extensive environmental exposure.

- Containers of solids must not be filled beyond their weight and volume capacity

- Jugs and bottles should not be filled above the shoulder of the container
- Cans (5 gallons or less) should have at least two inches of headspace between the liquid level and the head of the container
- Drums (larger than 5 gallons) should have at least four inches of headspace

Containers must be closed or sealed to prevent leakage. ***All waste collection containers must be kept closed*** **except when adding or removing material *or* prevention of pressure building (e.g. aqua regia).** This includes latching of funnels with lids that are installed in drums and similar arrangements. If the waste container is receiving waste from an automatic process, the container must still be sealed in an appropriate manner (e.g. tubing from equipment that discharges into a container through an appropriate cap with an orifice for the tubing).

In addition to the above, generators must ensure that Satellite Accumulation Areas:

A. Are adequately secured to prevent unauthorized personnel from tampering with the waste containers.
B. Be accessible to EHS personnel.
C. Have hazardous waste separated from non-waste chemicals.
D. Contain less than 55 gallons of any one hazardous/regulated waste or one quart of acutely hazardous waste; if more than 55 gallons of waste is generated at a satellite area, the excess of 55 gallons must be dated and moved to a designated Central Accumulation Area within 3 days.
E. Containers may only be removed from a Satellite Accumulation Area if they are moved **directly** to a Central Accumulation Area designated by EHS.
F. Spill control equipment is available and accessible.
G. Containers within the area are properly labeled (see below).

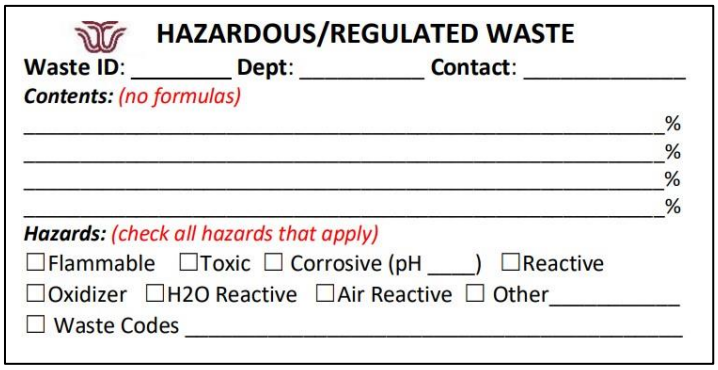
Central Accumulation Areas (<180-day storage) must meet the following requirements:

A. Central Accumulation Areas shall be designated and reported to the TCEQ by EHS.
B. All containers of hazardous/regulated waste in the Central Accumulation Areas must be marked with the TWU hazardous/regulated waste label (see below), including the date accumulation began. NOTE: The start date is when the first waste is poured/placed into the waste container at the Central Accumulation Area OR the date when the filled container is moved from a Satellite Accumulation Area to a Central Accumulation Area.
C. Waste may only leave the Central Accumulation Area if it is being accepted by an appropriately licensed waste hauler for transportation to an appropriate disposal or recycling facility.
D. Weekly inspections must be conducted at the Central Accumulation Areas by EHS personnel.
E. There must be sufficient aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the Central Accumulation Area.
F. Required equipment must be easily accessible, in working condition, and tested to ensure it is in working condition.
G. There must be a telephone or hand-held two-way radio in the Central Accumulation Area or nearby capable of contacting TWU Police Department dispatchers or other emergency responders.
H. There must be portable fire extinguishers and fire control equipment, including special extinguishing equipment (foam, inert gas, or dry chemicals) as necessary.
I. There must be spill control equipment available in the area or nearby.

J. There must be fire hydrants or other source of water (reservoir, storage tank, etc.) with adequate volume and pressure, foam producing equipment, automatic sprinklers, or water spray systems.

IX. LABELS AND LABELING

All containers of hazardous waste must be labeled appropriately immediately upon generation. The label pictured below, as well as a larger one with more space for contents, is available from EHS and must be affixed to the container **prior to placing any hazardous waste in the container**.


HAZARDOUS/REGULATED WASTE
Waste ID: _____ Dept: _____ Contact: _____
Contents: *(no formulas)*
_____%
_____%
_____%
_____%
Hazards: *(check all hazards that apply)*
☐Flammable ☐Toxic ☐ Corrosive (pH ____) ☐Reactive
☐Oxidizer ☐H2O Reactive ☐Air Reactive ☐ Other_____
☐ Waste Codes _____

1. **Waste ID:** This field is mandatory if not all contents will fit on the label and should correspond to a spreadsheet/waste log entry with the respective waste contents in the container. If all contents fit on the label, this is optional. Complete the "Waste ID" field with a unique ID code.

2. **Date:** Currently, only EHS staff should date a waste label when the bottle moved to a Central Accumulation Area.

3. **Contact:** The "Contact" field should list someone with knowledge of the waste who can answer questions if necessary.

4. **Contents:** List full chemical names and approximate percentages of the waste(s) in the container in the "Contents" section, *not* the process that created the waste, formulas, or abbreviations. If you cannot fit all of the chemical names on the label, ensure that you have a basic description, all appropriate hazards checked, and the full description is maintained in a spreadsheet or similar corresponding to the Waste ID listed on the label.

5. **Hazards:** The associated hazards (flammable, toxic, corrosive, reactive, and oxidizer) must be marked in the appropriate fields.

X. DISPOSAL

All hazardous and regulated waste generated at TWU must be disposed of according to state and federal regulations through EHS.

Waste containers that are full and/or ready for disposal must be properly labeled as per the "Labeling and Labels" section above.

1. Submit a Waste Pickup Request online with the requisite details.

2. The following wastes are unacceptable for standard removal by EHS:

    A. Containers with improper caps, leaks, outside contamination, improper labeling, or improperly logged or unlogged containers.
    B. Gas cylinders not owned by TWU; these should be returned directly to the manufacturer or supplier.
    C. Reactive waste streams without a properly vented cap.
    D. Containers that are bulging, fuming, or bubbling.
    E. Wastes in incompatible or improper containers.

3. It is **illegal** to dispose of hazardous/regulated waste in any of the following ways:
    A. Disposal through the sanitary or storm sewers (some wastes are permitted to be disposed of through the sanitary sewer, but only in accordance with our wastewater discharge permits and/or local regulations – contact EHS to ensure you meet these requirements).
    B. Intentional evaporation or solidification.
    C. Any treatment or neutralization that is not a necessary step of the waste generating process.
    D. Disposal in the regular trash.

4. Contact EHS to pick up empty containers that are no longer needed. Broken containers must be placed in a broken glass container or other study container that will prevent injury to custodial and trash handling personnel.

XI. UNIVERSAL WASTE

Universal Waste is a category of hazardous waste that includes materials that are very common and represent a lower human health risk. The regulatory requirements for these materials have been reduced as a result. Materials that can be managed as universal waste include:

A. Batteries (that meet the hazardous waste criteria, other than lead-acid batteries that are being recycled).
B. Pesticides.
C. Mercury-containing Equipment (such as thermometers and thermostats).
D. Lamps (e.g. fluorescent, mercury vapor, sodium vapor, and metal halide).
E. Paint and Paint-related Material, including spray paint.

The general requirements for managing Universal Waste are as follows:

1. Store waste in a way that prevents releases to the environment.
2. Containers must be closed, structurally sound, compatible with the contents, and display no sign of leaks/spills or wastes on the outside of the containers.
3. Containers must be labeled "Universal Waste" and the name of the waste (e.g. Universal Waste Lamps, Universal Waste Paint and Paint-related Waste).

4. Containers must be dated when the first waste was placed in the container, or other records indicating that the waste has **not been on site for longer than one year**.
5. Universal Waste must be disposed of through properly licensed hazardous or universal waste transporter and disposal or recycling firms.

Light bulbs represent the highest volume of Universal Waste at TWU. Waste bulbs are collected at the Electrical/Plumbing Shop within the Facilities Management Service Center on the Denton campus, and in the Facilities Management areas of the Dallas and Houston Campuses. Lamps must not be accumulated at any other locations. At the Denton campus, electricians generally carry a box of waste lamps with them in their vehicle(s), and then deposit the box at the accumulation area in the electrical shop in the FMC Service Center. The boxes in their vehicles must be labeled and dated when the first bulb is placed in the box and kept closed. The Dallas and Houston campuses will have a similar procedure, but the bulbs will be immediately placed in the accumulation area within the Facilities Management area.

XII. USED OIL

Requirements for management of used oil are as follows:

1. Containers of used oil must be in good condition.
2. Containers must be labeled "Used Oil".
3. Used oil must be disposed of via appropriately licensed used oil management firms.
4. Used oil must not be mixed with other wastes, or it must be managed in accordance with the rules applicable to the other waste.
5. Additional requirements for oil (including used oil) management are listed in the TWU Spill Prevention, Control, and Countermeasures Plan.

Used oil filters are also disposed of through licensed used oil management firms. Rags and other sorbent materials containing used oil may be disposed of as general refuse if there are no free liquids. Contact EHS if there is any question about proper disposal of oil containing materials.

XIII. SOURCE REDUCTION AND HAZARDOUS WASTE MINIMIZATION

Hazardous waste regulations have evolved from emphasis on reduction to the prevention of environmental pollution. The Pollution Prevention Act of 1990 (Federal Regulation) made the prevention of pollution and reduction of waste generation, a national priority. The Texas Waste Reduction Policy Act (Senate Bill 1099 of 1991) required TWU to prepare and implement a Pollution Prevention (P2) Plan for the Denton campus. The P2 Plan lists the specific commitments to reduction of hazardous waste generation that TWU has made, and projects that will be implemented to fulfill them.

XIV. EMERGENCY PROCEDURES

TWU's Hazard Communication Program requires that TWU employees be informed of hazardous materials that they might use or be exposed to at work. In addition to that program, the Chemical Hygiene/Lab Safety Program includes training on handling spills and other emergencies. Safety Data Sheets (SDS) are a source of this information and must be maintained for all chemicals used or stored within a workplace. Furthermore, employees that

generate or handle hazardous waste are required to complete a dedicated “Hazardous Waste Training” course in Bridge. Special cleanup supplies shall be available, and employees will be trained in how to use these supplies. Contaminated clothing, rags, absorbent materials, or other waste from cleanup of spills or leaks must be properly disposed of with the assistance of EHS.

Furthermore, EHS will make arrangements at least annually with TWU PD, the City of Denton Fire Department, local hospitals, and other applicable agencies as needed to ensure adequate response in emergency situations. This will include topics such as tours of the waste storage and generation areas, layout of campus, traffic flow and evacuation routes, and the types of emergencies/injuries that may result from hazardous waste related activities on campus. In the event that the respective agencies decline to make arrangements or visit the campus, appropriate records confirming attempts were made by TWU will be maintained by EHS.

XV. CAMPUS EMERGENCY CONTACT INFORMATION

TWU Police Department: 940-898-2911
EHS Emergency Number: 940-898-4001 option 5
Emergency Coordinator (Matt Moustakas): (940) 898-2924