

MIDDLE TENNESSEE STATE UNIVERSITY  
POLICIES AND PROCEDURES MANUAL

POLICY NO: IV:00:04

DATE: February 15, 2005

SUPERSEDES POLICY NO: None

DATED:

SUBJECT: Hazardous Waste Reduction Policy and Plan

APPROVED: Sidney A. McPhee, President



**WASTE REDUCTION POLICY STATEMENT**

This document (herein referred to as the Plan) is written to meet requirements of the Tennessee Hazardous Waste Reduction Act of 1990, and calls for positive commitment to its objectives by administrators, faculty, and staff to continually seek opportunities to reduce the volume and toxicity of any hazardous wastes generated.

**THE WASTE REDUCTION PLAN**

**OBJECTIVES OF THE PLAN:**

1. To reduce all hazardous waste streams to the minimum quantity that is technically feasible and economically practical within the goals of the University.
2. To continue in perpetual effect an instrument that will:  
Maintain University waste awareness,  
Ensure on-going analysis of factors influencing waste generation,  
Provide continuing employee and student training, and  
Provide for annual evaluation of the Plan's effectiveness.

**ESSENTIAL ELEMENTS OF THE PLAN:**

1. Each department generating hazardous waste on a continuing basis will develop a departmental hazardous waste reduction plan, copies of which are to be on file within the generating department and in the Environmental Health and Safety Office as part of the University Hazardous Waste Reduction Plan. Departmental plans will be updated annually, dated, and signed by the department chair.
2. An annual waste assessment will be conducted in each applicable department by a waste reduction team appointed by the department chair. The assessment will be scheduled so that results will be available to the departmental hazardous waste coordinator prior to updating the departmental hazardous waste reduction plan.

3. Each waste reduction team will establish a waste reduction goal and an implementation schedule at the beginning of each calendar year. A progress report and the next year's goals and implementation schedule will be submitted to appropriate department chairs and the departmental hazardous waste coordinator prior to completion of annual hazardous waste generation reports.
4. Waste reduction teams will be required to measure and track all wastes generated by the team's department. Tracking of wastes should be accomplished through techniques that will ensure all costs associated with hazardous waste disposal are accounted for. Item 4 of Description of the Plan contains additional information on these techniques.
5. New processes and major process changes should involve a waste stream impact study.
6. Each department using, storing, or producing hazardous materials will establish a program to control inventories and acquisition of hazardous materials.
7. Employee training on waste reduction will be embedded in the on-going Safety and Employee Right-to-Know training programs conducted within the departments. Special emphasis should be placed on controlling acquisition and creation of hazardous materials.

#### **DESCRIPTION OF THE PLAN:**

1. Administration: Administrative support for the Hazardous Waste Reduction Plan will be provided by Environmental Health and Safety Services with oversight by the University Standing Committee on Safety. Duties of the Committee associated with the Plan will include:
  - \*Review waste data and project progress annually;
  - \*Report findings, make recommendations, and initiate project requests for implementation and corrective action;
  - \*Prepare an annual progress report for submission to upper management; and
  - \*Recommend updates to the Plan as necessary.
2. Training and Worker Involvement: Waste reduction will be incorporated into the existing training curriculum wherein employees are trained on the general nature of chemical hazards, safe operating procedures, and use of Material Safety Data Sheets (MSDS). Employees will be required to evaluate their own area's waste streams and be provided with resource materials that describe the technology available and currently used for reduction of waste streams of similar nature or in similar processes. Major emphasis will be on preventing waste generation by improved procedures, material substitution, and process changes. Employees should participate in tracking the costs of the wastes they generate and should be expected to use this information to continuously improve processes.

3. **New Processes, New Products, and Major Changes:** New processes, purchase of new products, or major changes likely to impact waste generation within departments will be initiated only after an analysis of the waste stream impact. New processes and major changes will require an estimate of the type and volume of the waste generated, its environmental impact and related costs. Departments will be required to assess waste impact early in design considerations. Any significant additional waste generated will require a challenge to the design before work proceeds. Waste reduction teams will be apprised early in the development as to the nature of the required process and asked for input on the anticipated waste streams' impact. Departmental groups will have strong incentive to challenge changes and the addition of new products because they are ultimately responsible for managing the costs associated with their waste streams.
  
4. **Waste Management Cost Accounting System:** Waste Management Cost Accounting System: Hazardous waste cost information will be maintained by the Environmental Health and Safety Office and disseminated to appropriate departments. Data will be compiled at least annually to provide guidance in waste reduction efforts. These costs will be tracked through the Hazardous Waste Disposal purchase order in addition to estimates of personnel time provided by generating and support departments. The Environmental Health and Safety Services account number shall be used to track the following expenditures associated with hazardous waste: permits, fees, and assessments required by regulatory agencies; waste treatment, storage, transportation, and disposal; analytical lab fees; and related items.

The Vice President for Business and Finance will be responsible for administering this policy and plan.