Hazardous Waste Labeling



Overview

In response to the United States Environmental Protection Agency (EPA) hazardous waste regulatory policy changes for academic laboratories, Weill Cornell Medicine is implementing the federal mandates **effective July 1, 2019**. Under the new rule, **all** hazardous waste containers must be marked with the words "Hazardous Waste" **and** indicate the hazard(s) associated with the waste contents. The new rules aim to help generators improve their management of hazardous waste, as well as protect the environment.

To comply with the updated regulation, Environmental Health and Safety (EHS) has designed new labels for hazardous waste and hazardous radioactive waste, which include OSHA's Globally Harmonized System of Classification and Labeling of Chemicals (GHS) pictogram as hazard indicators. These new labels will replace the old yellow hazardous waste and hazardous radioactive waste labels; and standardize all hazardous waste labels that are to be used on every container of chemical waste. This EHS Update provides guidance on marking the new hazardous waste label using OSHA's GHS hazard pictogram indicators.

The disposal procedures outlined in this update must be followed in conjunction with EHS Program Manual <u>5.2- Waste</u> Disposal Procedures.

Applicability

All faculty, students, staff, visitors, and contractors at WCM who intend to dispose of chemicals must strictly adhere to the procedures identified in this update.

Responsibilities

Hazardous Waste Generators (generators) ensure that chemicals and empty containers are properly discharged, disposed of, recycled, and/or otherwise processed in compliance with this update and <u>WCM's Waste Disposal</u>

<u>Procedures</u>. Generators must obtain all reference materials (e.g., Safety Data Sheets, EHS resources) to properly identify the hazard(s) of chemical wastes prior to disposing of chemicals and/or empty containers.

WCM Environmental Health and Safety (EHS) assists WCM personnel, providing technical assistance and guidance on hazardous waste management and disposal. EHS also ensures that the information provided to generators is concurrent with the laws and regulations governing the specific means of disposal.

Note: for specifics on hazardous waste disposal, please refer to the EHS Program Manual <u>5.2- Waste Disposal Procedures</u>, or contact EHS.

Procedures

NEW HAZARDOUS WASTE LABEL

The new hazardous waste label, pictured on the right, must identify all hazardous waste generated at WCM.

Label components include:

- The words "Hazardous Waste"
- Contact name, contact number, principal investigator
- Hazard characteristics and GHS pictograms
- Each chemical constituent in the container

You may request printed labels from EHS or download printer-friendly labels from our <u>website</u>.





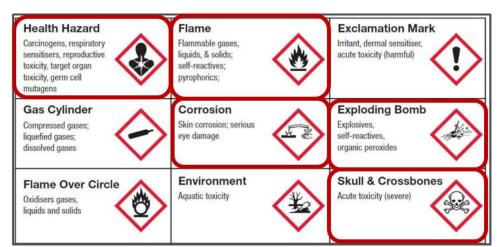


GLOBALLY HARMONIZED SYSTEM (GHS) CHEMICAL HAZARD IDENTIFICATION

The new hazardous waste labels incorporate the Global Harmonized System (GHS) pictograms indicated with red border below.

The icons on the label consist of:

- Flame pictogram for flammable liquids and solids
- Corrosion pictogram for corrosive substances
- Skull & crossbones pictogram for toxic substances
- Exploding bomb pictogram for unstable and/or reactive chemicals
- Health hazard pictogram for nonacutely hazardous substances



HAZARDOUS WASTE CONTAINER LABELING REQUIREMENTS

When labeling chemical waste, please follow these guidelines, shown on the sample label below.

- The hazardous waste label must be attached to the container when it is initially used for waste (i.e., when the first drop is added).
- The individual generating the waste must complete the label; listing his/her contact information, as well as principal investigator.
- Wastes that are commingled must list all components in the contents section, including water and all trace materials. Approximate percentages (%) should be provided if possible for each component of the mixture.
- All components must be listed as soon as they are added to the container. The full name of the chemical must be listed (e.g., Waste Oil, Ethanol, Acetone, etc.). The appropriate box(es) must be



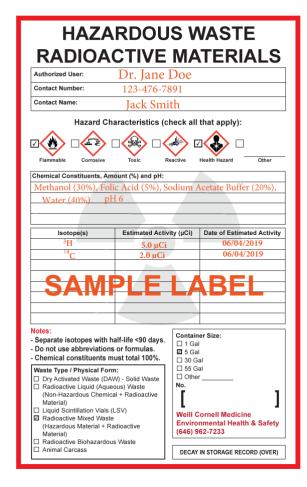


- checked for the hazard(s) associated with each component present in the waste container. To determine hazards, refer to the original reagent container labels and/or the SDS.
- Note: For more information, please refer to the EHS Program Manual 4.2- Chemical Hazard Communication.
- All information on the label must be legible and accurate. The information on the label is essential to categorizing and packing the waste for final disposal.
- Once the container is full, a Chemical Collection Request should be placed on the EHS website to ensure prompt pickup. Waste pickups occur every Tuesday and Thursday.



NEW HAZARDOUS RADIOACTIVE WASTE LABEL (DOUBLE SIDED)

The new hazardous radioactive waste label below, must identify all hazardous waste containing radioactive isotopes generated at WCM.



The front of the label includes:

- The words "Hazardous Waste"
- Authorized User, Contact number, Contact name
- Hazard characteristics and GHS pictograms
- Each chemical constituent, approximate percentage, and pH
- Isotopes, Estimated activity, and Date of estimated activity
- Waste Type/ Physical Form
- Container Size

When completing the front of this label, please follow the Hazardous Waste Container Labeling requirements in the preceding section and refer to the sample above for additional isotope information.

RADIOACTIVE WASTE DECAY IN STORAGE RECORD Radionuclides with half-life <90 days
This record must be retained for 3 years
Date Container Sealed: 06/04/2019 Disposal Date: 06/05/2019 Background Survey: 200 CPM Surface Survey: 200 CPM
<u>Survey Instrument</u>
Model: 3 Ludlum
Serial Number: 67075 Your Name: Jack Smith
DECAY IN STORAGE INSTRUCTIONS 1. Seal liner or container lid with tape. 2. Record date container was sealed above.
Move container to storage location. Store container for 10 half-lives. Record all information listed above before disposal.
For more information, please visit the EHS website: https://ehs.weill.cornell.edu/waste-disposal
SAMPLE LABEL

The back of the label includes:

- **Date Container Sealed**
- Disposal Date
- **Background Survey**
- Surface Survey
- Information of Survey Instrument

When completing the back of this label, please follow the guidelines detailed in EHS Program Manual 5.2-Waste Disposal Procedures.



References

- **USEPA** <u>Hazardous Waste Generator Improvements Rule</u>: https://www.gpo.gov/fdsys/pkg/FR-2016-11-28/pdf/2016-27429.pdf
- 40 CFR 260 & 49 CFR Part 172
- OSHA Hazard Communication: https://www.osha.gov/dsg/hazcom
- EHS Manual 5.2 Waste Disposal Procedures: https://ehs.weill.cornell.edu/sites/default/files/5.2wastedisposal_0.pdf
- EHS Hazardous Waste Labels: https://ehs.weill.cornell.edu/forms-resources/labels-lists-signs