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Date: June 5, 2020
To: All RML Employees
From: Barry Twardoski
RE: **RML Hazardous Waste Procedures**

As a registered generator of hazardous wastes, RML must comply with regulations enforced by the U.S. EPA and the Montana Department of Environmental Quality. A summary of RML's procedures for collection, labeling and handling wastes is provided below.

General Lab Procedures

- Do not put hazardous waste containers in hallways or public areas.
- A "RML Hazardous Waste Tag" is required for every waste container. Attach waste tag and record date and contents when first waste is added to container. Each tag must provide the name of the hazardous waste generator, building, room number, phone extension and description of chemicals and compositions.
- Keep waste containers closed when not in use.
- Waste streams must be segregated appropriately (e.g. acids, bases, oxidizers, reactives, metals, halogenated vs non-halogenated, etc.)
- Biological waste mixtures are appropriately marked with a biohazard symbol.
- Radioactive waste mixtures are properly marked with radiation symbol.
- Never put small tubes, pipette tips or items other than liquids in the satellite chemical collection containers. These items should also not go down drains.
- Hazardous wastes MUST BE picked up within 90 days of the accumulation start date.
- Acute toxic wastes (e.g., sodium azide, osmium tetroxide) must not exceed 1 Liter in the lab.
- Drain disposal of hazardous wastes is strictly prohibited at RML. Special exceptions apply to nonhazardous substances, see below.
- Call 363-9219 to request pickup of chemical waste.

Storage Containers

- Containers must be compatible with chemicals stored within, must be leak proof, and must have secure lids tightly closed. Liquid wastes must also be stored on secondary containment.
- RML satellite collection containers (red cans) are available in 1, 2.5 or 5 gallon sizes.

- Other glass or plastic containers can be used to store smaller waste volumes. Original labels must be obliterated, and actual contents clearly identified.

Guidelines for Drain Disposal

Please be aware that at RML pouring hazardous substances and untreated medical waste down sink drains is strictly prohibited. Treated medical waste that is still recognizable (e.g., pipette tips) are also prohibited. RML interior drains are connected to the sanitary sewer system which drains to the Hamilton wastewater treatment plant.

As the Hamilton treatment plant discharges directly to the Bitterroot River and RML is the largest single user, we need to limit the substances that are poured down our sinks and into the sewer. Improper drain disposal can result in:

- Upsets at Hamilton's sewage treatment plant.
- Direct harm to the environment
- Hazards to unsuspecting employees working within the sewer system.
- Violation of the Clean Water Act.

It is acceptable to drain dispose of small amounts of some substance in quantities that do not pose a hazard to human health or the environment. We have lists of commonly used lab reagent kits and their disposal guidelines available upon request.

When considering drain disposal of alcohols, RML must also comply with City of Hamilton sewer prohibitions and ensure protection of human health and the environment.

The drain disposal guidelines for commonly used alcohol compounds are presented below.

- Drain disposal of flammable substances is strictly prohibited.
- Aqueous solutions of less than 10% ethanol or 2% isopropyl alcohol (IPA) can be drain disposed followed by at least 10 volumes of water.
- Drain disposal of aqueous ethanol or IPA wastes shall be limited to less than 1 liter per event.
- Ethanol or IPA wastes of more than 1 liter shall be disposed as hazardous waste.
- Alcohol wastes mixed with other hazardous chemicals shall only be disposed as hazardous waste.
- Methanol, methyl alcohol, butanol, glycerol are alcohols that shall not be drain disposed. These substances shall only be disposed as hazardous waste through the RML collection program.

Additional information on can be found in RML's campus Waste Management Plan