

Colleges/Universities produce hazardous waste from daily operations in labs, shops, power plants, paint shops, automotive, etc. – waste that we have control of, waste we determine as hazardous, waste we manage on a daily basis. These are hazardous wastes we officially generate, handle and dispose of using our EPA Generator ID; this hazardous waste we consider our own. Project-based generation of hazardous waste, however, is the responsibility of external contractors.

Construction management companies performing renovations and any sub-contractors removing material constituting hazardous waste shall not use our college EPA ID # to dispose of the waste. Any contractor or subcontractor who performs the process that moves the material from "in use" to "waste" must apply and obtain a temporary EPA ID number for the job contracted.

Examples include but are not limited to:

- Window caulking found to contain PCBs.
- ACM – Asbestos Containing Material
- Lead contaminated material
- Material contaminated with Petroleum
- Any material exhibiting the characteristics of Hazardous waste as per 40CFR 261

The College is the owner of the facility and the site of generation (official address), but contractors MUST be considered as:

- Operators (company that manages RCRA site);
- Generators; as processes they perform produce hazardous waste;
- Responsible for obtaining their own temporary EPA ID number to be used for disposal of hazardous waste generated by them

Hazardous waste 'generators' who provide any services that generate hazardous waste – must apply for a TEMPORARY EPA Generator ID. Technically, the college does not have control of these hazardous waste generated by these contractors.

Contractors must conduct the following:

- determine their generator status (LQG or SQG)
- conduct a hazardous waste determination
- package, label and temporarily store the waste
- perform routine inspections of storage location
- contact environmental management companies for disposal
- as generator, sign hazardous waste manifest