

Purpose

This procedure establishes the Hazardous Waste/Hazardous Materials Contingency Plan (CP) for the storage of hazardous wastes/materials at Eastern Washington University (EWU) and the emergency response to spills and fires of such materials. The purpose of this CP is, as stated in 40 CFR 265.51(a), to “minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or “surface water.”

Application

The provisions of the CP are to be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Specifically, this CP addresses emergencies related to chemicals and hazardous waste stored at the: 1) Surbeck Service Area, 2) Science Building, 3) ISC, and 4) Art Department.

This plan does not cover 1) Fuel Station Operations; 2) Industrial Area, 3) Rozell Boiler Operations; 4) Water Treatment Building; or 5) off main campus locations. These areas are covered in separate guidance documents named accordingly. This document will be used in conjunction with the EWU Campus Emergency Management Plan when a large uncontrolled spill or chemical fire occurs.

Contacts (I.E., Emergency Coordinator)

As required in 40 CFR 265.55, at all times, there is at least one employee either on the Facility premises or on call (i.e., available to respond to an emergency by reaching the Facility within a short period of time) with the responsibility for coordinating all emergency response measures. The emergency coordinator at EWU, who meet the qualifications, is listed below:

Primary:

**Chad Johnson, Manager Environmental Health and Safety,
Emergency Coordinator, University Safety Officer, University Chemical Hygiene Officer**
002 Martin Hall
Cheney WA, 99004
Home Address On File with EWU Human Resources
Office: (509) 359-6455
Home/Cell: (509) 359-5768

Alternate:

Kathleen Kees, Safety Officer 3
002 Martin Hall
Cheney WA, 99004
Home Address On File With EWU Human Resources
Office: (509) 359-2788
Cell: (509) 220-7049

The emergency coordinator, or their designate, inspects the emergency equipment monthly to ensure that items are present and operational. The emergency coordinator also reviews this CP annually to ensure that it is kept current and amended whenever changes occur that will significantly affect the ability of this facility to respond to an emergency.

During an emergency the on-scene emergency coordinator will control the response activities until the Cheney Fire Department or EWU Police arrive, at which time he relinquishes control to the Cheney Fire Department's Incident Commander. Once control is relinquished, the emergency coordinator acts as a liaison between the Incident Commander and university personnel.

Emergency Notification and Building Alarms

EWU maintains a timely alert system (email, text, phone alerts) that will notify campus and building occupants about emergencies of all types. See the EWU Campus Police website to sign up for this free service.

Building alarms for fire, explosion, bomb, chlorine, ammonia releases are all the same. The alarm consists of a loud 110db audible shrieking horn with built in flashing strobe system. When this alarm sounds, evacuate the building immediately.

Hazardous Waste and Chemical Storage Areas

Surbeck Services Area

The Surbeck Services area lies between Washington Street and Parking lot 12. Maintenance shops, a boat storage building, a fueling station, recycling center, main refuse drop point, vehicle parking lots, administrative offices and several chemical and waste storage areas are located here. The following chemical and hazardous waste storage areas are of concern:

Chemical Storage Building (CST)

The Chemical Storage Building is a slab on grade concrete structure divided into six spaces. The central portion is storage for flammable solvents and corrosive chemicals used by EWU maintenance shops. The northern two rooms are used for herbicide and limited pesticide storage. The building has smoke detection and water fire suppression system. The building has a below surface waste collection system in case of a spill. This system is piped to an underground vault located on the south side of the structure.

Surbeck Services Building (SUR)

The Surbeck Services Building is a slab on grade concrete structure divided into several spaces for EWU support shops including Building Maintenance, Electric Shop, Paint Shop, Plumbing Shop and Auto Shop. Two of the shops are of particular concern, the Paint Shop and Auto Shop, both located in the central portion of the building. These shops store large quantities of flammable chemicals and paints. Both locations store waste products, used paints and solvents in the paint shop, used oil in the Auto shop.

Central Stores (CES)

Central Stores is a slab on grade metal building housing offices to the south and a storage warehouse with associated offices to the north. The building is EWU's main stock area for incoming custodial and maintenance chemicals as well as mechanical and electrical parts. The warehouse stores flammable and corrosive chemicals. A storage loft extends over the southern office area.

The Surbeck Services area Hazardous Materials/Chemical Hygiene plan is covered under a separate guidance document. However, this area is included here for contingency planning.

Waste Transfer Facility (WTF)

The WTF is a self-contained slab on grade building of masonry construction, with a Class I Division I electrical system. Access to the building is restricted and personnel working in the facility must always have a cell phone and/or a hand-held radio for emergency communications.

The WTF is also equipped with:

- Smoke detection equipment
- Fire Suppression system.
- Fire extinguishers.
- Spill clean-up materials

The WTF serves as the location where hazardous wastes are stored prior to being picked up for recycle or disposal by a licensed hazardous waste transporter. Hazardous wastes are generally generated in one of four ways:

1. As part of research activities and teaching experiments in the Chemistry, Biology, Physics, and Geology departments,
2. As part of teaching and student activities in the Visual Arts departments (i.e., painting, sculpture, ceramics, lithography, and photography studios),
3. As a result of the clean-out of old, expired, and unused chemicals throughout the campus,
4. As a result of expired or excess chemicals used in facility maintenance activities.

Typically, hazardous wastes generated in the first two processes described above accumulate near the point of generation in satellite accumulation areas (SAAs). Once the accumulation containers are full, they are transferred to the WTF. Old, expired, and unused chemicals are typically transferred directly to the WTF, once they are declared a waste.

EWU is currently classified as Large Quantity Generator (LQG). As such, hazardous wastes may be stored at the WTF for a maximum of 90 days before being removed for disposal or recycle by a licensed hazardous waste transporter.

Other campus areas

Science Building

The Science Building is a large concrete and metal two storage story structure with three basement mechanical rooms/tunnels and mechanical rooms on the roof. Most of the structure is slab on grade. There is a large courtyard in the center of the building. The building is supplied heat through a steam tunnel system. Natural gas is supplied to the various laboratories throughout the building. The building has a fire alarm and sprinkler system.

There are numerous areas for chemical storage. Most research labs will house some chemicals and depending on the research, may generate hazardous waste. Teaching labs have little in the way of chemical storage and will, depending on the class, have hazardous waste satellite storage areas established during the quarter or academic year. Chemicals in the teaching laboratories are not as toxic as those found in the research laboratories.

Two locations in the science building are of particular concern: Room 179 and 209.

Room 179 is located next to the loading dock area. This is the main building chemical storage area. There are five sub rooms that make up room 179. Each room has segregated chemicals based on chemical hazards and departmental segregation. Room 179 was designed to be a secondary containment in case of a spill. There are no drains in this room and the room is sunken relative to the outer hallway and adjoining rooms. The room has its own exhaust ventilation system discharging to the southwest toward Washington Street. Room 179 has an independent smoke detection and fire suppression system. Chemicals stored in 179 include acids, bases, flammable, reactive, toxic, explosive chemicals.

Room 209 houses the chemistry chemical storage area. Laboratory preparation occurs in this area. A small hazardous waste satellite accumulation area is also located here. Chemicals stored include; acids, bases, flammable, reactive, toxic and explosive chemicals in smaller quantities than what can be found in 179 but more than can be found in research labs.

ISC

The ISC is a large concrete, brick, and metal four story structure with a lower mechanical room and mechanical rooms on the roof. The structure is slab on grade, with the part of the first-floor subgrade. Three skywalks connect The ISC to the Science Building. The building is supplied heat through a steam tunnel system. Natural gas is supplied to the various laboratories throughout the building. The building has a fire alarm and sprinkler system. This building went online in 2021.

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Areas in the ISC of particular concern include: Rooms 106, 118A, 118B, 118C, 122, 122A and Room 214A.

Room 106 is the main stockroom for the Department of Biology. Currently, there are no chemicals stored in Room 106, but there may be plans for this to happen in the future. Rooms 118A-C are the compressed gas storage areas. These three rooms separate compressed gas cylinders into compatible types and contain storage racks for securing large cylinders. Room 122 is the main stockroom for the Department of Chemistry. Room 122 contains two sub rooms: Room 120 (Technicians office) and Room 122A (Hazardous Chemical Storage). Room 122 houses general chemicals with low hazard ratings while Room 122A houses more hazardous chemicals. There are no drains in either Room 122 or 122A. Separate, individually vented cabinets for acids, bases, flammable, reactive, toxic and explosive chemicals are housed in Room 122A. All aforementioned rooms are located on the ground floor of the ISC. Room 214A is on the second floor of the ISC and serves as the cadaver lab for the Department of Biology. This room contains individually vented cabinets for storage of preserved

biological specimens, and it also contains an accumulation area for flammable cadaver fluids. There are no drains in Room 214A.

Art Building

The Art Building is a slab on grade concrete and brick structure circular in design. The building is supplied heat through a steam tunnel system and small basement mechanical room. Minor areas of chemical storage and hazardous waste generation can be found in the paint studio, sculpture studio, ceramics studio, photographic studio, silkscreen print area, and metal sculpture area. Natural gas is piped to the metal sculpture and ceramics area for kilns and furnaces.

Arrangements with Local Authorities

Under 40 CFR 265.37, a facility must attempt to make the following arrangements, where applicable:

- Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes.
- Agreements with state emergency response teams, emergency response contractors, and equipment suppliers.
- Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

EWU has attempted to make the abovementioned arrangements with the list of local authorities. Letters were written in 2011 and are maintained on-file at the EWU Construction and Planning Office.

Leaking Chemical Containers

Small leaking chemical containers must be handled as a small chemical spill. For large leaking containers five gallons or above, contact EH&S immediately. The required use of a respirator will require medical clearance. Contact EH&S for more information.

Chemical Spills

Spills in General

As you leave an area involved in a chemical spill, assist people exiting the area by doing the following:

- Shut off electrical power to the area or the equipment to eliminate sources of ignition. Electrical distribution panels inside laboratories and chemical storage areas shall be accessible and unlocked.
- All gas line shutoffs will be accessible and marked.
- Evacuate personnel from the spill area.
- Direct personnel to the nearest fire exit or out of the room. Do not use the elevators.
- Attend to any victims and Call 911

First Aid

- Remove victim (s) from spill area to fresh air (but do not endanger your own life by entering areas with toxic gases).
- Immediately remove contaminated clothing and be careful not to contaminate yourself.

- Wash skin with water.
- Flush skin and/or eyes with water for at least 15 minutes. You may not feel any immediate effect from a chemical, but it is important to wash quickly and thoroughly because many chemicals can cause severe tissue damage which is not apparent until hours later. Chemicals that are corrosive or a health hazard of greater than 2 may require medical attention.

Chemical spills over large body areas

- Have the person remove contaminated clothing while under a shower.
- If the person is unconscious, you may need to remove clothing to conduct washing procedures. Care must be taken not to expose yourself to the chemical.
- Flood affected body area with water for 15 minutes.
- Resume water washing if pain returns.
- Wash off chemicals with water; do not use neutralizing chemicals, creams, lotion (except in the case of Hydrofluoric Acid).
- Make sure medical personnel understand exactly what chemical is involved
- Contact EH&S

Who Cleans Up the Spill?

Only people trained to cleanup spills may clean up a spill. People not involved in the cleanup should leave the area.

Satellite waste accumulation areas and chemical storage areas can be found in several locations on the EWU campus. All satellite accumulation areas and chemical storage areas will have spill kits and be managed by trained employees. Satellite Accumulation Area Managers Responsibilities are included in the guidance with the same name. Most satellite accumulation areas will have stored hazardous chemicals to be used in laboratory experiments. All chemical laboratories will have spill kits and a responsible person who is trained in environmental cleanup and chemical hazard issues. The responsible person in research labs are primarily the main researcher and/or the department laboratory technicians. Department laboratory technicians are also Hazardous Waste Satellite Accumulation Managers. These people will be trained in limited spill response.

Hazardous waste and hazardous materials in teaching laboratories will be the responsibility of the head researcher and/or laboratory technicians. Teaching assistants act as backup to head researchers, and laboratory technicians in the case of a spill. The main responsibilities of Teaching Assistants are to aid students to avoid the spill and notify the head researcher or laboratory technicians of the spill. In the case of a laboratory fire, assistants will aid in laboratory evacuations. Teacher assistants may use fire extinguishers on fires if chemicals are not involved and they have been trained.

You Clean Up the Spill

For chemical spills which do not involve injury, do not represent a fire or life hazard, are less than one gallon of low to moderate health or fire danger (based on HMIS or NFPA Safe T Gram designations) and for which employees have the proper training and proper personal protective equipment, satellite waste accumulation managers and/or head researchers will clean up the spill. If there are any questions concerning a particular spill situation, contact EH&S. In special situations you may be able to clean up minor spills of acids, bases and mercury if there is less than 100ml spilled and you have been trained and have the proper spill kits available. All

waste will be collected for proper hazardous waste disposal. If a mercury thermometer is broken and the mercury goes down the drain, contact EH&S at once.

What To Do When You Clean Up A Spill

If you have proper training, proper personal protective equipment, the proper materials to absorb and clean up your chemical spill, no one has been injured, the spill is contained and the spill is not life threatening or a fire or explosion hazard, then follow the following procedures:

Chemical spill cleanup kits are a must in the laboratory and other service areas that use or store chemicals. The kits are very useful if you and your fellow workers know how to use them properly. Chemical absorbents or neutralizers can be used quickly and effectively to contain a spill. Use these items if your personal safety is not in jeopardy.

If in your judgment and MSDS/SDS recommendations, a respirator is necessary to clean up the spill, secure the room and call EH&S to aid in the spill cleanup.

Spill Kits

If you store and work with chemicals, you must have appropriate spill kits accessible, and you must know how to use them. For example, a standard spill kit and replacement parts are available through various vendors. The spill kit contains materials that neutralize an acid spill and absorb small chemical spills and also contains handy items such as goggles, gloves and hazardous waste labels. Some recommended items for a spill kit:

Absorbents	Neutralizing Material	Containers and Supplies	Protective Gear
Spill pads: universal for acid, base, solvents and oil	Baking soda for neutralizing acids	4, 20 x 30", heavy duty (6mm) plastic bags 1 five-gallon reusable screw top plastic bucket. Use to store all kit supplies and later to hold spill waste for pickup by EH&S. Snap together dustpan and brush Waste collection form and labels	1 pair heavy nitrile gloves 1 pair goggles

However, this spill kit will not be sufficient for large spills or spills of some chemicals. Read the MSDS sheets for the chemicals in the lab to determine the proper spill kit contents, and PPE necessary to safely work with chemicals and cleanup spills. Remember not all PPE will work with all chemicals. Examples of chemicals that need special kits are:

**Chemical
 spilled**
Spills kit materials

Hydrofluoric acid	Calcium glutonate gel, hydrofluoric acid neutralizing agent (call EH&S at 359-6496 for information)
Mercury	Mercury spill kit. Contains mercury absorbent sponges, mercury absorbent powder, syringe aspirator, gloves, waste collecting materials, and hazardous waste labels
Formaldehyde	Contains formaldehyde spill pads, gloves, waste collecting materials and hazardous waste labels

Note: The departmental Chemical Hygiene Plans will provide locations and make up of spill kits for that department.

Be aware of the fact that while you may be in a well-ventilated room, the Lower Explosion Limit (LEL) of a chemical may be reached at the surface of the spill and you want to avoid any sparks or sources of ignition when doing the cleanup. The protective equipment in a spill kit will not protect you from a flash fire. Many times the best way to handle the spill of a highly volatile compound, such as diethyl ether or chloroform, is to open the windows and fume hoods, leave the room, close the doors and let the room air out. In these cases, call EH&S at 359-6455, so they can send someone to monitor the situation. If in your professional opinion, there is a strong risk of fire or explosion, call 9-1-1 and EH&S for fire department backup pull the building alarm and evacuate the building. In most cases of a chemical bottle breaking in a laboratory, you will not need to call the fire department.

Do not forget that any person who needs to wear a respirator must be fit tested, have a medical evaluation, and meet the requirements of 29 CFR 1910.134.

Choose appropriate personal protective equipment.

- Always wear protective gloves and goggles.
- If there is a chance of body contact, wear an apron or coveralls.
- If the spill is on the floor, wear protective boots or shoe covers.
- If there are inhalation hazards, wear a respirator. If a respirator is used, the person wearing the respirator must meet all of the requirements set forth in 29 CFR 1910.134. (These include but are not limited to fit testing medical evaluation).

Remove ignition sources.

- Turn off hot plates, stirring motors and flame sources.
- Shut down all other equipment.
- If unable to shut off sources of ignition, notify the emergency responders.
- Confine or contain the spill.

- Cover with an absorbent mixture.
- Clean up minor spill with paper towels or a sponge if they will not react.
- Slowly sweep solid materials into a dustpan, and place in a sealed container.
- If it is an acid/base spill, first add a neutralizing agent.

Small amounts of inorganic acid/base:

- Use a neutralizing agent and then absorbent material.

Small amounts of other materials:

- Absorb with non-reactive material (e.g. vermiculite, sand, towels, Floor-Dri).

Large amounts of inorganic acid/base:

- Neutralize and call for help.

Large amounts of other materials:

- Make a judgment call, dependent upon the amount, toxicity and reactivity; you may handle it yourself or call for help.

Spills that require special handling:

Acid chlorides:

- Use Oil-Dri, Zorb-all, dry sand, etc.
- Avoid water and sodium bicarbonate.

Mercury:

The following precautions should be taken if a **small** mercury (broken thermometer) spill occurs:

- If shoes and clothes are contaminated minimize tracking by removing shoes and clothing. If shoes and clothes are contaminated place them in a separate sealed plastic bag and notify EH&S for a hazardous waste pickup. More than likely your clothes and shoes will not be able to be decontaminated.
- Do **NOT** use a vacuum cleaner to clean up the spill. A vacuum cleaner will spread the mercury vapors and tiny droplets will settle throughout the area, increasing the spread of contamination and the chance of exposure.
- Use a mercury spill kit to clean up the mercury.
- After all visible mercury has been collected, use a mercury cleanup kit to clean the spill area and work it into the cracks with a broom or brush. Do not add water. Materials in the mercury spill kit will rapidly bind to the remaining mercury and can be swept up with a broom and dustpan. Contaminated carpeting should be removed and discarded as hazardous waste starting with the spill room. Notify EH&S to receive proper containers.

- Contaminated materials and mercury collected from small spills may be discarded as hazardous waste. Place items in a sealable container and label appropriately.
- After cleanup is complete contact EH&S for ambient air screening of the area to confirm ambient air levels are acceptable for reoccupation.
- For large spills or spills that go down the drain contact EH&S at 359-6496

Alkali metals:

- Smother in dry sand.
- Put in a hood.

White (Yellow) Phosphorus:

- Blanket with wet sand or wet absorbent

Slowly remove absorbent material with a broom and dustpan as to not raise dust.

- Place in a plastic bag or other appropriate container.
- If the spilled chemical is a volatile solvent, transfer the plastic bag to a fume hood for storage until the material can be picked up.
- If a material is a non-volatile hazardous chemical, dispose of the material as a hazardous chemical waste.
- If the spilled material is a non-volatile non-hazardous chemical, contact EH&S to determine the appropriate disposal method.

All waste cleanup materials noted above must be handled as hazardous waste and labeled accordingly. Contact EH&S for a pickup

EH&S Cleans Up the Spill

For all other chemical spill situations, including those for which you have any questions or doubts about your ability to clean up the spill, call EH&S at 359-6496. The situation will be evaluated and a proper response will follow. After hours, call 509-359-5768 or 220-7049 if there is no answer dial 9-1-1.

For Spills involving Fuel Station Petroleum releases see Fuel Station Petroleum Guidance.

For releases involving Sodium Hydroxide used in the potable water system see Sodium Hydroxide Guidance.

For chlorine gas releases see Chlorine Guidance.

For radioactive materials see the Radiation Safety Directive Procedure.

For Emergencies at Rozell see Rozell Boiler Operation Petroleum and Chemical Safe Handling and Cleanup Guidance.

If the chemical spill is too large or too hazardous for EH&S to clean up or a fire is involved, the following emergency procedures will be followed.

EMERGENCY PROCEDURES

EVACUATION

- On-scene Emergency Coordinator shall direct evacuation away from the hazardous area until Cheney Fire Department or EWU Police arrive.
- Fire Evacuation maps are attached to this document.
- The direction of evacuation and distance from the hazard or will depend on hazards involved, wind speed and wind direction.
- As an immediate precautionary measure isolate the area 330 feet in all directions for large chemical fires or large chemical releases to the environment.
- Alert anyone in immediate vicinity of potential dangers.
- Personnel will not return to evacuated areas until directed by the On-Scene Commander or other competent authorities.

SMALL FIRE

- Evacuate site
- Notify Cheney Fire Department (automatically alerted if alarm is activated) but call 911 anyway.
- If safe to do so, employees will shut off power and attempt to control fire using fire extinguishers if trained for chemicals with a health hazard of less than 2 (see above).
- When the fire department arrives notify them as to what chemical are involved.

LARGE SPILL/BUILDING FIRE

Large spills (as identified by EH&S personnel), storage building, storage rooms or laboratory fires.

- Evacuate site and initiate emergency notification through 911. For any large spill the Cheney Fire Department and the EWU Police Department will be the initial responders. The Cheney Police Department and Cheney Medical Center may also be included as needed.
- Contact Energy Management at 2245 (work order desk) to shut down the surrounding buildings ventilation intakes.
- If safe, trained employees with proper personal protective equipment will attempt to prevent spill from entering storm drains or running off-site.
- Immediately identify the character, exact source, amount, and real extent of any released materials. This may be done by observation or review of Facility records/manifests and, if necessary, by chemical analysis.
- The Emergency Coordinator continues in the lead role until the EWU Police or Cheney Fire Department arrives, at which time he relinquishes control to the EWU police or Cheney Fire Department's Incident Commander.
- If the incident exceeds the capability of the Cheney Fire Department the Incident Commander will request assistance from the Spokane County Emergency Management (509) 427-2204.
- Once the spill scene is stabilized the Emergency Coordinator will contact Clean Harbors 24-hour Emergency Response center (800) 645-8265 to conduct extensive clean-up operations.

Significant Release

Whether a release is reportable or not depends on several factors such as amount of hazardous materials or waste, and proximity of sensitive receptors such as hospitals or waterways. Some examples of significant releases include:

- Hazardous material/waste releases to the environment (soil, water and in some cases air)
- Results in an emergency response
- Causes injury
- Goes off site
- Is released to the sewer/storm water system

Significant releases must be reported to the Washington Emergency Response Division (800) 258-5990 **and** the National Response Center (800) 424-8802. The Washington Department of Ecology Eastern Regional Office (509) 329-3400 should also be notified as soon as possible (24 hours or less). In the event of a large spill, the EH&S manager will notify the regulatory agencies. In the event of a release to the sewer, or storm water system the Cheney Public Works Department, Wastewater Facility will be alerted (Todd Ableman 498-9249).

The following information will be required:

- Name and telephone number of the reporter (i.e., emergency coordinator)
- Name and address of the Facility and location of the spill/fire.
- Time and type of incident (e.g., release, fire).
- Name and quantity of material(s) involved, to the extent known.
- What are the current threats to health or the environment.
- The extent of injuries or environmental damage, if any.
- What is being done to contain and clean-up the spill.

After Release Actions

Emergency Coordinator shall:

- Supervise clean-up efforts, and ensure that recovered hazardous waste and contaminated materials are properly collected and disposed of.
- Document all details of the incident.
- Ensure all emergency response equipment and supplies are restored and ready for future use.
- Submit a written follow-up within 15 days to the State Emergency Response Commission and the Department of Ecology.

REVISION HISTORY		
Rev	Affected Page	Change Descriptions
0	All	Release 9/16/2012
1	All	Update 7/31/2013
2	All	Reviewed all 12/10/15
3	All	Update to New Format 5/11/2017
4	P4	Tawanka Removed 11/14/19
5	Page 5, 8	Added ISC, Added Formaldehyde neutralizer
6	All	Corrected spelling; corrected grammar and updated phone #'s
7	All	Changed out "Start Something Big," Logos 1/24/23