

MEMORANDUM

Date: August 17, 2022

To: Deans/ADRs

From: Miguel Delgado, Chief Risk Officer, Risk Management Services
Herb Wagner, Director, Occupational/Environmental Health and Safety, Risk Management Services

Subject: **Arizona Department of Environmental Quality Inspection/Hazardous Waste Labeling Requirement**

The University of Arizona Hazardous Waste Management Program was recently inspected by the Arizona Department of Environmental Quality (ADEQ). The inspection identified deficiencies that require immediate corrective action and follow-up to ADEQ. Risk Management Services (RMS), in collaboration with Research Laboratory Safety Services (RLSS), needs your assistance in order to maintain a fully functioning and regulated program. This notice outlines the steps to comply with the ADEQ inspection and findings and should be distributed broadly to relevant users.

Requirement- No later than August 31, 2022

Each facility, laboratory, and research location that uses or stores hazardous waste must identify and properly label such waste. RMS is requiring each laboratory to **immediately** label all waste as follows:

- Each container holding waste **must be labeled with** the words, "**Hazardous Waste**"
- **Identify** the waste with the hazard identification word or symbol of that chemical (i.e., flammable, corrosive, oxidizer, toxic, etc.)

Label templates containing hazard identification symbols can be generated through the RLSS User Dashboard. Step by step instructions to generate labels through the User Dashboard *are attached*. If the RLSS User Dashboard is not current, users may make labels that meet the above requirements.

Follow-up- September 1, 2022

RMS will conduct on-site inspections across campus September 1, 2022, to document that labeling activity is complete so that UArizona can respond promptly to the ADEQ. The results of the ADEQ inspection will require a change to current RMS policy regarding hazardous waste management. Additional guidance from RMS is forthcoming.

Questions

We appreciate your partnership in resolving this non-compliance issue promptly to minimize any further regulatory action. If you have any questions or concerns, please contact RMS at 520-621-1790 or RMS-Contact@arizona.edu.