

Central Storage Area Management Plan

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1.0 INTRODUCTION

Bucknell University is committed to operating its buildings and academic programs in the safest manner possible, with concern for the individual and the protection of the environment in accordance with all applicable Federal and State statutes. This management plan is required under Federal Resource, Conservation and Recovery Act. This plan is required of Large Quantity Generators of hazardous waste.

1.1 Location

Bucknell operates two central storage areas (CSAs).

Hazmat CSA

Hazardous Materials Storage Area
Center Parking Lot between Seventh Street and Snake Road.
701 Moore Avenue
Lewisburg, PA 17837

Chemistry CSA

Chemistry Department
Rooke Chemistry Building, Room 006
701 Moore Avenue
Lewisburg, PA 17837

1.2 Setting

The hazmat CSA is within the Bucknell University campus. It is located within the hazardous materials storage area (hazmat), north-west of the Production Center parking lot between Seventh Street and Snake Road. The surrounding area consists of an administrative building, an academic building, and parking lots.

The chemistry CSA is also within the Bucknell University campus. It is located within the Rooke Chemistry Building, on the corner of Seventh Street and Dent Drive. The CSA is in Room 006, on the south end of the ground floor of the building, below the loading dock. The surrounding area consists of an administrative building, an academic building, and a parking lot.

1.3 Description of CSA

The hazmat CSA consists of steel containment buildings secured behind an eight foot fence within the hazmat storage area. The hazmat storage area houses three containment buildings. The first containment building is used to store supplies in one compartment and Flammable chemicals in another. The second hazmat CSA container is separated into three separate compartments, with three separate entrances. Each compartment is separated by a fire resistant wall and has a dry sprinkler system available. The third compartment is used to store bulk virgin chemicals and will not be discussed in this plan. No automatic fire extinguishing capability is provided in the hazmat CSA. The container has fire and smoke detection capabilities and audible and visible alarms. The fenced area is implemented with a silent intrusion alarm on the gate to alert Public Safety when the gate is opened and the facility is accessed. The hazmat area does not have a phone.

Individuals accessing the site are required to have a cell phone or radio on their person and are required to notify Public Safety before entry, and upon exiting. The hazmat CSA does not have an emergency shower or eyewash onsite. A portable emergency eyewash is filled and onsite in the hazmat vehicle when hazardous waste transfer operations are being conducted. These operations occur on a quarterly basis and are scheduled in advance. An emergency shower is available just inside the back door of the Civil Engineering Test Building and inside the main entrance of the Administrative Services Production Facility. For added safety during hazardous waste transfer operations, activities occur only during daylight hours and during normal working days and business hours of the institution. Doors to both nearby facilities are to be left unlocked and accessible when hazardous waste operations are on-going.

The Chemistry CSA is located in Room 006 of the Rooke Chemistry Building. The university restricts access to this room to authorized personnel only. The door from the main hallway utilizes an ID card access system and the door to Room 006 requires a key, both doors lock automatically. The room has been implemented with an explosion proof lighting system. The CSA does not have floor drains and the floor has been sealed with an epoxy to inhibit its porosity. The room is approximately 4" below the hallway to create secondary containment of the room itself. A separate and isolated air handling system has been implemented to discharge vapors from the CSA. Smoke and heat detectors are present and are tied into Bucknell's central monitoring system. A fire extinguisher is located in the main hallway and an automatic sprinkler system is present in the CSA. All waste containers are placed into appropriate secondary containment on shelves, segregated by incompatibles.

1.4 Waste Generation

Bucknell University teaching laboratories and research laboratories use a variety of reactants, solvents and other hazardous chemicals or materials. Residual reactants, unused chemicals, or chemicals past their shelf life result in generation of hazardous wastes- mainly waste liquids, spent solvents or organic and inorganic solids or sludge. The Chemistry, Biology, Engineering, and Art Departments generate small amounts of such hazardous wastes on a regular basis. Laboratory protocols specify collection of compatible wastes in small satellite accumulation containers at the points of generation in each laboratory. All lab-generated wastes are collected and retained in the CSA for pickup and disposal by a licensed hazardous waste contractor. Several other University departments (Geology and Facilities Department) occasionally generate small quantities of hazardous waste, which are collected and aggregated in the CSA.

1.5 Generator Status

Bucknell University is classified as a Large Quantity Generator (LQG) of RCRA hazardous wastes. In accordance with 40 CFR 262.34 (a-c) facilities are considered an LQG if it generates more than 2,200 lbs (1,000 kg) of hazardous waste or more than 2.2 lbs (1 kg) of acute hazardous waste in any given calendar month.

2.0 PURPOSE OF PLAN

The purpose of this management plan is to minimize possible hazards to human health or the environment due to fire, explosion or release of RCRA hazardous wastes from the CSA to the interior of the Rooke Chemistry Building, to the air, to the soil or to the water outside the CSAs. This plan is meant to be a guidance document for persons managing and inspecting the CSA.

3.0 SCOPE

This plan covers RCRA hazardous wastes held in the hazmat CSA and the chemistry CSA, emergency equipment, and bulk storage of waste in the CSAs. It does not cover:

- The small satellite accumulation points in each laboratory (please reference the Bucknell University Hazardous Waste Management Plan)
- Inventories of hazardous chemicals stored in the stockroom or in labs (please reference the Bucknell University Chemical Hygiene Plan)
- Radioactive decay-out room or any storage of these wastes
- Biomedical waste storage room or any storage of these wastes.

4.0 GENERAL RESPONSIBILITIES

The EH&S Program Manager will appoint, train and assign inspection duties to personnel involved in the Weekly Inspection of the CSAs.

The assigned inspector is required to follow this management plan during inspection activities of the CSA and sign the inspection form at both CSAs.

5.0 FUNCTION AND JOB DESCRIPTION

5.1 EH&S Program Manager

The EH&S Program Manager is responsible for the training of CSA Inspectors and overall management of the plan. The EH&S Program Manager shall:

1. Train appropriate personnel
2. Maintain professional requirements as required by the plan
3. Review inspection documents
4. Perform random inspections

5.2 CSA Inspectors

CSA Inspectors are responsible for following the inspection protocols as outlined by this plan and administering the inspection every week. The Inspector shall:

1. Perform inspection tasks as established in iAuditor weekly hazardous waste inspection checklist
2. Notify the EH&S Program Manager immediately of any discrepancies in the inspection
3. Correct any discrepancies found in the inspection immediately if feasible.
4. Make arrangements with other trained inspectors to cover off time.

5.3 List of Trained Inspectors

Name	Phone Number	email
Carol Pavlick	570-577-3728	cp030@bucknell.edu
Gregg Rokavec	570-577-3337	gar017@bucknell.edu

6.0 ADMINISTRATION OF THE PLAN

6.1 Amendments to the Plan

The plan is amended when:

- The inspector list changes or when other key contacts within Bucknell change.
- The list of emergency equipment changes.
- The plan fails to uncover an inspection infraction.
- The regulations governing the scope and extent of the plan are revised.
- Any change is made in CSA operations or maintenance practices that substantially increases the risk or extent of an incident with hazardous waste material.

6.2 Periodic Plan Reviews

The plan is reviewed annually by the EH&S Manager for any need to amend or update it, using the checklist below.

CSA Management Plan Review		YES	NO
1.	Did the list of inspectors change or other key contact change?		
2.	Did the list of emergency equipment change?		
3.	Did the plan fail to discover a regulatory infraction?		
4.	Were the regulations governing the scope and extent of the plan revised?		
5.	Have significant changes been made in the physical layout of the campus effecting this plan?		
6.	Have changes been made to the campus operations or maintenance practices that substantially increases the risk or extent of an emergency?		
7.	Did a circumstance arise that increased the risk or extent of an emergency?		