



**MEMORANDUM**

TO: Principal Investigators,  
Laboratory Directors, and  
Other Individuals using and storing chemicals

FROM: Charles F. Gottlieb, Ph.D., Director

DATE: March 15, 2002

SUBJECT: Disposal of surplus and inherently waste-like chemicals

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As you are likely aware, the Environmental Protection Agency (EPA) has undertaken a compliance initiative directed toward colleges and universities throughout the country. The result in every case has been a large fine assessed against the institution for various violations of the EPA regulations. Examples of the more severe regulatory action within the past 3 years include:

University of Hawaii	\$1,700,000,
University of Michigan	\$1,000,000,
University of Rhode Island	\$ 800,000,
Boston University	\$ 753,000, and
University of Missouri, Columbia	\$ 582,000.

A violation consistently cited has been the excessive accumulation of stored chemicals in laboratories, especially those that the EPA considers "inherently waste-like". Inherently waste-like means 1) old chemicals, 2) chemicals with deteriorating labels, or 3) chemicals with deteriorating or otherwise damaged containers.

I am requesting that you, as a person responsible for chemicals in a laboratory, review the inventory of chemicals stored in your laboratory and dispose of all those chemicals which fit the above description of inherently waste-like.

To arrange for chemical pickup and disposal, please contact Environmental Health and Safety at 305-243-3400. The waste disposal form can be found on the EHS website ([www.miami.edu/ehs](http://www.miami.edu/ehs)) at [www.miami.edu/health-safety/ChemWaste.pdf](http://www.miami.edu/health-safety/ChemWaste.pdf).