

# UNIVERSITY OF GUELPH HAZARDOUS (SUBJECT) WASTE MANAGEMENT GUIDELINE FOR THE REGIONAL CAMPUS AND RESEARCH STATIONS

## Related University Program

[Hazardous Waste Management Program](#)

## Intent

The purpose of this guideline is to assist the University of Guelph (U of G) Regional Campus and Research Stations in understanding their full obligations under provincial environmental legislation.

## Procedure

The R.R.O. [Regulation 347](#) General - Waste Management sets out requirements for handling, storing, managing and disposing of Liquid Industrial or Hazardous Waste (also known as Subject Waste in Ontario). It includes a comprehensive system requiring waste producers (generators) to register and to track these wastes, through manifests, from the point of generation to their final disposal. The regulation sets out responsibilities for generators, carriers, and receivers of Hazardous (Subject) Waste.

The regional campus and each research stations are to designate one person plus an alternate, who will be fully trained and responsible for hazardous (subject) waste management. These persons will be the main contacts for Environmental Health and Safety (EHS) personnel.

The Hazardous (Subject) Waste Management self-inspection checklist included in Appendix A is to be sent to the designated contacts at the Regional Campus and Research Stations annually. Completed checklists are to be submitted to EHS by November 30 each year.

The following sections describe requirements for appropriate (hazardous) subject waste management.

## Hazardous (Subject) Waste Handling:

- All waste must be placed in containers that are compatible with the material being packaged.
- Waste streams are to be stored separately.
- Containers must be filled, closed, secured and maintained so that no accidental releases can occur.
- Waste containers are to be provided with secondary containment (as appropriate) to contain any spills.
- Waste containers are to be kept closed except when adding wastes.
- Containers must be stored securely – not stacked too high, or on uneven surfaces.
- Liquid waste containers should never be filled to more than 75% capacity to allow for expansion of the liquids and headspace vapours.

## Hazardous (Subject) Waste Labeling:

Prior to placing any hazardous subject waste into the waste container, a Hazardous (Subject) Waste label must be completed and affixed to the outside of the container. Containers must be labelled to clearly identify the contents and the associated hazards. As a minimum, labels for hazardous (subject) waste should include:

- Campus/station name
- Contact info for the person responsible for hazardous (subject) waste management (job title)
- Phone number
- Office/location
- Description of the waste (i.e. the contents of the container)
- Date when the waste was disposed into a container for the first time
- The physical state (e.g. liquid, solid, sludge)

Example of hazardous (subject) waste label:

<h3>Subject Waste</h3>	
Campus/Station: _____	
Contact: _____	Phone: _____
Building: _____	Room: _____
Waste Description: _____	
Date of the first waste disposal into container: _____	
Physical state:	
<input type="checkbox"/> Liquid	
<input type="checkbox"/> Solid	
<input type="checkbox"/> Other _____	

## Hazardous (Subject) Waste Storage:

- All waste must be stored in a manner and location designed to contain potential spills.
- Stored waste is to be closed to prevent mixing of waste or contamination by rainwater/snow if outdoors.
- As required by Regulation 347, waste can be kept for no longer than 90 days without further reporting. The 90-day timeframe begins as soon as any amount of hazardous

(subject) waste is accumulated in the waste container. The 90-day storage period does not start when a container used to store the waste is full and ready to be shipped off-site for disposal.

- Ensure disposal of hazardous subject waste is scheduled and performed at least every 90 days.
- In the event hazardous (subject) waste is to be stored for longer than 90 days requires prior approval from EHS. Contact (519) 824-4120 ext: 53282 or [labsafe@uoguelph.ca](mailto:labsafe@uoguelph.ca) for more information.

### **Facility Registration:**

- Facilities must register all hazardous (subject) waste through RPRA (Resource Productivity and Recovery Authority).
- The RPRA registration is maintained by EHS, Senior Health and Safety Consultant (Laboratory). Contact (519) 824-4120 ext: 53282 or [labsafe@uoguelph.ca](mailto:labsafe@uoguelph.ca) for more information.

### **RPRA**

RPRA is an organization in Ontario responsible for overseeing recycling and waste reduction programs. It ensures that companies that produce products like packaging, electronics, and batteries take responsibility for managing the waste those products create. By enforcing environmental laws, tracking recycling performance, and promoting better resource use, RPRA helps reduce landfill waste and supports a more sustainable, circular economy across the province.

To register any new waste streams that will be generated at your facility, modify registration information for hazardous (subject) waste being actively generated and or remove hazardous (subject) waste that is no longer being actively generated contact EHS, Senior Health and Safety Consultant (Laboratory) (519) 824-4120 ext. 53282 or [labsafe@uoguelph.ca](mailto:labsafe@uoguelph.ca).

All waste disposed of from your site must be properly registered on RPRA prior to shipping by a carrier.

### **Training:**

- All persons handling wastes must be adequately trained and training records maintained by their supervisor. Training and/or current certification in WHMIS, TDG, as well as readily accessible Standard Operating Procedures (SOP) specific to the waste handling process at your location are mandatory.
- When in doubt, seek the advice of your supervisor or contact EHS, Senior Health and Safety Consultant (Laboratory) at (519) 824-4120 ext: 54270 or [labsafe@uoguelph.ca](mailto:labsafe@uoguelph.ca) for advice on how to handle and dispose of any hazardous (subject) waste.

### **Hazardous (Subject) Waste Carrier:**

- Any waste leaving your facility must be transported by a company with Ministry approval to transport waste. The approval will describe the waste classes and categories the carrier may transport. The current University contractor for chemical waste is RPR Environmental Inc. Tel: 1-800-667-5217

- All hazardous waste contractors must meet the provisions of the [Hazardous Waste Management Program](#). Please contact EHS (ehs@uoguelph.ca) for assistance.
- EHS must be informed of all carriers contracted at your location

## Regulatory audits:

- In the case of upcoming or unannounced audits by Ministry of the Environment, Conservation and Parks, contact EHS ([ehs@uoguelph.ca](mailto:ehs@uoguelph.ca)) for assistance.

## Records Maintenance:

Records that must be kept include generator registration reports, notice of storage, forms and records of all shipments of (hazardous) subject waste. These records can be kept in electronic and/or in paper format.

- Records of your generator registration reports are subject to ministry inspection. Records must contain sufficient information, so the Inspector can review any waste characterizations fully.
- Documents related to storing or moving (e.g. Manifests and Land Disposal Restrictions receiver notifications) of hazardous (subject) waste must be retained for at least two years and be available for review by a Ministry provincial officer during an inspection.

## Manifests

The Manifest is a legal document under which all hazardous (subject) waste is shipped. A link to the online RPRA manifest can be found [here](#).

A manifest is divided into 3 sections:

- Generator –U of G designated and fully trained person
  - a person/company who:
    - produces or stores hazardous (subject) waste, and
    - causes or allows more than the quantity of hazardous (subject) waste, as prescribed in regulation to be transported from the property where it is produced or stored.
- Carrier (Transporter)
  - a person/company who transports more than the quantity of hazardous (subject) waste prescribed in regulation.
- Consignee (Receiver)
  - a facility who receives more than the quantity of hazardous (subject) waste prescribed in regulation

Manifests are maintained electronically on the RPRA site. If you require copies of your manifest, contact [ehs@uoguelph.ca](mailto:ehs@uoguelph.ca).

## Frequently Asked Questions

### *What is Generator Registration?*

Under the requirements of Ontario Regulation 347 Waste Management each generator of (hazardous) subject waste in the province has to be registered with the Ministry of the Environment, Conservation and Parks.

### *What is the Generator Registration Number (ON#)?*

The Generator Registration Number (ON number) is a specific number assigned by the Ministry. This number is specific to location (municipal address). No hazardous (subject) waste is permitted to leave a location without the generator being properly assigned a generator registration number.

### *It is mandatory that this number be on all manifests.*

The ON number will appear on the manifest.

### *Does the University hold other ON numbers?*

Yes – since this number is specific to the municipal address, the University holds a unique generator registration number specific to each of its locations. Hazardous (subject) waste must only be shipped using the appropriate generator number.

### *How are hazardous (subject) waste streams aligned to an ON#?*

Under each ON number, a generator is legally required to have listed/registered each of the waste streams that are generated and shipped from that location.

### *How is hazardous (subject) waste registered for a specific ON#?*

All hazardous (subject) waste in the province is registered and tracked through the RPRA system. All registrations on RPRA are to be done through or with approval of EHS.

### *How do I confirm a waste is registered?*

To confirm waste is registered, please contact EHS.

### *Can new waste stream be added to an ON#?*

Yes - New waste streams can be added to RPRA

To register new waste stream please contact EHS, Senior Health and Safety Consultant (Laboratory) ext: 54270 or EHS office ext: 53282.

### *What is a Manifest?*

The Manifest is a Canadian form and similar for all provinces except Quebec. It is a legal document under which all (hazardous) subject waste is shipped.

### *What is the purpose of a Manifest?*

The manifest is a 6-sheet carbon copy document that travels with the (hazardous) subject waste. A waste manifest is a tracking document used to monitor the movement of waste—especially hazardous waste—from the point where it's generated to its final disposal or recycling site. Its main purpose is to ensure that waste is handled safely, transported legally, and disposed of properly without harming people or the environment. The manifest includes details like the type and quantity of waste, who generated it, the transporter, and the receiving facility, creating a clear chain of responsibility.

### *Who issues Manifests?*

Manifests are issued by the Ministry of the Environment, Conservation and Parks and each manifest is numbered with a unique identifier number in the top right hand corner. The carrier comes on-site with the manifest.

### *Who can sign a U of G Manifest?*

Only TDG and WHMIS trained, identified University of Guelph personnel should fill out and sign manifests electronically on behalf of University of Guelph unless other formal arrangements have been made. Of note, RPR Environmental is authorized to sign manifests on behalf of the University of Guelph (including main campus and research stations).

## **Summary Checklist:**

Do:

- Confirm all waste containers are in good condition
- Inspect storage area every month.
- Confirm packaging is compatible with waste and in good condition
- Apply proper labelling
- Confirm containers are closed to avoid the mixing of waste or contamination
- Confirm spill containment procedure is in place and all necessary absorbents are available to clean spills
- Designate a TDG and WHMIS trained person and a “back-up” person responsible for signing manifests
- Schedule all hazardous (subject) waste pick up prior to 90 days.
- Confirm that the waste being taken (type and quantity) is the waste identified on the manifest.
- Sign the electronic manifests only at the time of shipping.

Don't:

- Pre-sign manifests
- Receive waste from off site
- Dispose of waste to a sewer
- Transport waste off site yourself
- Store waste close to sewers or drains

Contact EHS, Senior Health and Safety Consultant (Laboratory) at ext: 54270 for additional information.

## Appendices

### Appendix A – Sample Waste Management Program Audit Form

#### *Waste Management Program Audit Form*

Audited By:

Location:

Date:

#### *Program Elements*

<b>Storage Area Monthly Inspections</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Is hazardous (subject) waste storage area free of spills/leaks?				
Are empty waste containers in good condition?				
Is spill prevention/response equipment and secondary containment in good condition?				
Is Personal Protective Equipment (PPE) available (eye protection (safety glasses /chemical goggles), respiratory equipment if required?				
Is eye wash station available?				
Is exhaust and/or make up air system working properly?				
Are emergency phone numbers available should a spill occur?				
Is the secondary containment compatible with the chemicals to be stored?				
Is the monthly waste inspection form completed and filed for record keeping?				
In case of problems found and corrective actions taken, is the follow - up inspection scheduled?				

<b>(Hazardous) Subject Waste Handling</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Are all waste streams stored in containers compatible with the waste?				
Is access to waste storage area restricted to designated person(s) and safe from vehicles – i.e. safe from someone backing into it with a farm vehicle, forklift, car etc.?				
Are waste containers in good condition (intact, not rusty)?				
Are materials that could adversely interact with each other separated by secondary containment and/or distance?				
Are containers filled, closed, secured and maintained so that no accidental releases can occur?				
Are waste containers provided with secondary containment to contain any spills?				
Are there spill cleanup procedures in place related to waste?				
Are waste containers kept closed (except when adding waste) to prevent mixing of waste or contamination?				
Are containers stored securely – not stacked too high, or on uneven surfaces?				
Are waste containers filled at maximum 75% capacity to allow for expansion of the liquids and headspace vapours?				

<b>Hazardous (Subject) Waste Labeling</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Are all waste containers clearly labelled?				

<b>Hazardous (Subject) Waste Labeling</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
<p>Are (hazardous) subject waste containers are labelled to indicate:</p> <ul style="list-style-type: none"> <li>• A campus/station name</li> <li>• Name of the person in charge of hazardous (subject) waste management</li> <li>• Phone number</li> <li>• Office/location</li> <li>• Description of the waste (i.e. the contents of the container)</li> <li>• Date when the waste was disposed into a container for the first time</li> <li>• Physical state (e.g. liquid, solid, sludge)?</li> </ul>				

<b>Hazardous (Subject) Waste Storage</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Are containers stored in a manner and area to contain spills?				
Is hazardous (subject) waste retained less than 90 days?				
Is a schedule established with a contractor ensuring disposal of hazardous (subject) waste is performed at least every 90 days?				
Do you ensure storage area is inspected on a regular basis?				

<b>Facility Registration</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Are all hazardous (subject) wastes registered in RPRA (Resource Productivity and Recovery Authority)?				
Did you provide an update to EHS on all hazardous (subject) waste planned to be generated, being actively generated and waste that won't be generated in the upcoming year? (Typical hazardous (subject) waste includes: fluorescent tubes, batteries, waste oil, sharps and needles, used chemicals, insecticides, herbicides, pesticides, hydraulic fluids, parts washer fluids)				

<b>Facility Registration</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Did you obtain EHS approval for any waste to be stored longer than 90 days?				

<b>Training</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Has a primary and "back-up" person been identified for completing and signing manifests? (Note: must be an identified and trained U of G person)				
Are persons handling hazardous (subject) waste adequately trained and training records maintained? <ul style="list-style-type: none"> <li>• WHMIS,</li> <li>• TDG</li> </ul>				
Are all persons trained in TDG in possession of their TDG Certificates? (Note: subject to MOE audit)				

<b>Subject Waste Carrier</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Are you hiring the current University contractor to transport the hazardous (subject) waste off site?				
If you are hiring another company, did you contact EHS to confirm approval?				
Did you provide EHS with list of all carriers contracted at your location?				

<b>Regulatory audit</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Did you inform EHS about potential upcoming or unannounced audits by the Ministry?				

<b>Good Practice</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>COMMENTS</b>
Do you verify the information on the manifest each time the hazardous (subject) waste is transported off site?				
Do you ensure that the waste being transported off site (type and quantity) is the waste identified on the manifest?				
Do you sign manifests only at the time of shipping?				