

Title: Hazardous Waste Psychology
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Abstract:

I do not deal with hazardous waste. I deal with people. In a small college setting, as a single person with many hats, most of the hazardous waste management is actually done by others. Although the regulations are filled with specific requirements for containers, paper work, etc., a successful program requires developing skills of another sort. Compliance is after all, changing someone's behavior. This presentation will define a successful waste management program as the result of good motivational, organizational, and leadership skills. Both general concepts and practical examples from a collegiate environment will be discussed. The presentation will center on *Steve's Seven Strategies for Avoiding Conflict and Controlling Cost*; an accumulation of concepts learned from sixteen years of consulting and staff positions at many colleges.

Paper:

I do not deal with hazardous waste. I deal with people. In a small college setting, as a single person with many hats, most of the hazardous waste management is actually done by others. In a large, diverse university setting maybe more so. Although the regulations are filled with specific requirements for containers, paper work, etc., a successful program requires developing skills of another sort. Compliance is after all, changing someone's behavior. After many years of trying, and on some occasions actually succeeding, several basic concepts have arisen thru which I focus my management programs. What follows is only slightly organized collection of concepts, management techniques, and compliance strategies that may have applicability in your own college or university programs.

First the caveats:

This is not an organized lecture in management psychology. I took that course once, sometime during the Nixon administration. It is really just a collection of tips that I have noticed colleagues take an interest in.

These are things that work for me, or observations that I have made, as a consultant to colleges or a college staff member. They may not work for you. Perhaps knowing how they do not work for you may lead to a technique that will.

I have not worked everywhere. The Standard Industrial Category 8221; Universities and Colleges, is a remarkably diverse lot of organizations to be put under one heading. My

experience is with what are referred to as small colleges, where typically one person wears many hats.

I tend to wander. Many members of the audience for this paper have responsibilities in addition to that for hazardous waste management. Certainly the interrelationship between these issues needs to be recognized even by those fortunate enough to practice a narrower specialty.

These limitations being stated, I hope the following list provides some useful information. I figured every one else has seven, why not give it a try.

Steve's Seven Strategies for Avoiding Conflict and Controlling Cost

1. No Walls:

A college or a university is a single corporate entity. Your hazardous waste program needs to be, in some way, a single program for ALL college operations. Look at it from the other side. EPA doesn't see that a university or college is made up of schools, departments, institutes, etc. They may see different campuses, or locations, or buildings. But these inspectors are outsiders. If the sign at the front door has the same logo, lettering style, and colors, then the inspection is of the same responsible party. The different names on the door are there just to add bullet points on the inspection report. This is why the repeat offender label is so quickly applied to Colleges and Universities. When that citation arrives it will not have your name on it, or the name of your department, or laboratory, or research project. The citation will be a legal action against "The Board of Trustees of..."

Government regulators find our complexity as bewildering as we perceive the regulations. Colleges operate more like a business form known as a "conglomerate"; group of unrelated companies operating independently for the same owner. This is why, in part, so many EPA publications insist that the most important ingredient to a successful environmental management program is direct participation from upper level management. Certainly support from the top is great but on an issue as minutely detailed as hazardous waste a top down management will lead to as many problems as it might solve.

Think horizontal, not vertical. The key is to be able to move the same level of expertise and management standards through all of the subdivisions in the organization structure. If an appeal to a higher authority helps this process alone, well then great. If having friends in low places works, that's great too. Horizontal movement at the level of the waste generators is what will yield results. Hence the title: no walls.

2. Be Proactive:

Do something even if it is just a paper document: you've considered the regulation and how we think it applies to the College. You're never going to please everyone anyway. It shows to regulators, and even to your boss, that you are not slacking off. You are just struggling with an issue that maybe you need more resources to adequately address.

Cultivate "The Art of Being Suitably Vague". This is not the same as being evasive. You are not trying to cover up anything. You are trying to communicate to a remarkable

diverse audience. From the auto shop guys to the post-doc fellows; from unused store bought cleaners to chemicals that have never existed before. But we all know only too well, that simple regulatory concepts like waste stream become often impossible to define on a college campus. Write to your reality, not to your perfection.

Track down legacy wastes: stuff that's been sitting in the corner for many years. Disposal prices are not going down so what are you waiting for? Participate in changes involving chemical management particularly at the end of a cycle. For example: Who is completing their graduate research? Who is retiring? What renovations are schedule for the summer? Be there when the disposal decisions are made, don't wait for a phone call afterward.

3. Stay Connected:

No one knows everything. Stay connected to your peers through events like this conference or the folks from the other college in town. The people who do the same job as you are not your competition; they're your colleagues. Colleagues are the most impartial source of information on your real competition: local regulatory inspectors, suppliers, and hazardous waste contractors.

Do not eat lunch with people you like. If you are paid on a salary, then lunch is company time. It's a good time to apologize to people who mistakenly think that you did something wrong. It's also a great time to hear someone else's side of the story. Over time you will to gain insight on how your client organizations actually work and where are the best opportunities to have an impact.

The world is divided in to two groups. People you work with and people you work around. Yes, we would like to have more in the former. However, Vilfredo Pareto was probably right: 80 percent of the problems come from 20 of the people. Just making that list is important. Taking opportunities to shift the ratio a little more in your favor is just as important but human nature being what it is, resources shouldn't be wasted where you know it will not produce a reasonable result. And just for a little stress reduction, once a year send your list to the north pole.

4. Integrated Programs:

Learn how your college works; the paper flows, the budget process, the job responsibilities, and then fit your management system into the existing structure. For example: if faculty are comfortable with obtaining stock chemicals through a purchase requisition or centralized stock room, wouldn't it be easier to run you waste system through the same system? It is a "go with the flow" concept.

Don't forget vendors as part of your system. Find out the routines of your suppliers, transporters, and testing labs. Yes, they are after your money but that doesn't mean they can't be part of your team.

Consider spreading issues important to your program to other peoples' programs. Does that academic department have its own handbook? Does the employee performance review

form have a section for complying with college environmental policies? Are research proposals required to specify waste disposal needs?

5. Teachable Moment:

A lot more work can be done if you teach others how to do it. It is easy to teach when you are ready to teach. It is more productive to teach when they are ready to learn. Don't follow your schedule; follow their interest.

That mandatory employee orientation training module on hazardous waste management is a real thriller. It's sinks in along with all of the other first day mind expansion efforts. It is unfortunate that so many of our training programs are driven by regulatory liability. "In the first ten days" or "works directly supervised until" and so on. It rarely fulfills the need for training. People learn most about how to do a task by spending time doing the task. Or as they call it in the athletic department: practice. This concept also applies to the work done by faculty, researchers and others creating hazardous wastes. You have to compliment the mandatory stuff with a rapid response training program. Accompany any service call, like a spill incident or just a waste pick-up, with a reiteration of that portion of your initial training program. Respond to individual questions or concerns to a broader audience. If one faculty member doesn't understand how to do something, maybe others don't either. To borrow a term in vogue else where on campus, let's call it life long learning.

6. Service Orientation:

A carrot on a stick still works. Find what they need and use that to get them to act in your preferred manner. Offer services, not restraints. Find out their blocks and remove them (or make it easy for them to remove).

Customizing products seems to help their acceptance. You can buy hazardous waste labels and hand them out. Or print your own and include the name of the college or institute or department. If they see themselves as a separate entity then they may be more accepting of label that notes that identity. Take the opportunity to think of your needs on these labels. Replacing a blank line with check off boxes based on RCRA or your state regulations will make getting label information from others one step closer.

7. Higher Level of Control:

Having a hazardous waste program that relies on reasonable and well understood administrative procedures is a goal worth pursuing. Having a lock on the door works even better. This is what the OSHA Personnel Protective Equipment Standard refers to as engineering controls over administrative controls. It is unfortunate that so few engineering controls are available to fit our needs. So if you can't take that big step, pursue every opportunity to take a small step. Lab waste funnels with attached lids are one step closer to compliance. They are fallible, to be sure, and they still rely on administrative procedures to keep them closed when required. But they are one step above the old glass funnel approach. When each open container represents a \$10,000 citation, one step closer is worth the effort.

If we must rely on administrative controls, deliver an organized and coherent communication to counteract a "folklore" culture. It is great, and perhaps unavoidable,

when others on campus act on your behalf to educate their colleagues about hazardous waste issues. But this comes at a risk. Bad habits spread faster than SARS. Your instructions need to be as easy to get as those from someone who just happens to be passing by. The internet is a big assistance here. Policies and procedures can be accessible and kept up to date with as easy not available before. What environmental managers need to remember is that web sites are the most extraordinary communication tool ever invented. More people don't read my painstakingly written procedures than ever before. Available all of the time is not the same, or as effective as being available at the right time. Again the waste labels; are the instructions for completing them on your web site, in the accumulation area, or on the label itself? It's like your electric bill. As you being the final step, licking the envelope to seal it closed, what comes rushing straight for your eyes? That little check off list to remind you to sign the check, note your account number, and so on. It's all in the timing. Yes, filling out every waste label on campus ourselves would be the lock on the door but our challenge is to achieve the same lock through others.

Well, that's the seven. They are meant to provoke thoughts about activities at your home college with a different point of view. As you can see, it's not a manual that you can copy. It is more a pair of magic glasses that help you see the invisible workings of your institution. How you take advantage of this insight is up to you. Good luck.

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