



# University of New Haven

## POLICIES AND PROCEDURES

**Policy Title:**

### Universal Waste Management Policy

*Policy No.:* 8215

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**Responsible Office:** Department of Public Safety

**Responsible Official:** Associate VP of Public Safety & Administrative Services

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## **1.0 Policy Statement**

The University of New Haven collects and disposes of Universal Waste in accordance with United States Environmental Protection Agency (EPA) and the Connecticut Department of Energy and Environmental Protection (CT DEEP) regulations.

### **1.1 Purpose and Scope**

This plan provides a written description of the Universal Waste management procedures and disposal methods at the University of New Haven. The University encourages any suggestions from employees for improving this plan for Universal Waste management, as the University is committed to developing and maintaining an effective protocol.

### **1.2 Review**

The Associate Vice President of Public Safety and Administrative Services will review and update this policy whenever necessary or at least annually.

All the elements of this policy are considered University of New Haven policy and may be enforced as such. The failure on the part of the employees to follow the policies and safety requirements of this Plan may result in disciplinary action.

## **2.0 Roles and Responsibilities**

### **2.1 Associate Vice President of Public Safety and Administrative Services**

- Provide administrative support for this program.
- Review and revise the universal waste management policy as needed for compliance with applicable regulations.
- Receive and file all shipping documents for universal waste disposed of off-site.

### **2.2 Associate Vice President of Facilities**

- Assure that all contractors and facility department staff are following federal and state universal waste regulations as well as University policies and procedures.

### **2.3 Director of Facilities**

- Assure that all universal wastes outlined in this policy is collected and stored per applicable local, state and federal regulations.
- Assure universal waste collection area in the Winchester basement is kept neat, orderly and in compliance with local, state and federal regulations.

### **2.3 Information Technology Manager**

- Ensure that all work completed by information technology staff adheres to this policy.

### **2.4 Employees**

- Comply with all local, state and federal regulations and University of New Haven universal waste policies.
- Attend required training annually.

## **3.0 Universal Waste Rule**

The Universal Waste Rule provides a set of streamlined regulations to reduce the regulatory burden by allowing longer time for the storage of certain types of wastes, reduced record-keeping requirements and allows the consolidation off-site of the materials without a permit.

### **3.1 What is regulated under the Universal Waste Rule?**

- **Used Electronics** – Computers, monitors, televisions, keyboards, printers, etc. (Anything that has a circuit board or a CRT.) Electronic equipment containing lead, mercury, cadmium, silver and many other hazardous components can be managed as universal waste.
- **Fluorescent Lamps, Bulbs** – Includes all mercury containing lamps, such as mercury vapor, sodium vapor and high-pressure sodium bulbs. Broken bulbs may not be managed as universal waste.
- **Mercury-containing thermostats and other mercury-containing equipment.**
- **Unused Pesticides** – not regulated otherwise by the EPA
- **Batteries** – Rechargeable batteries and some non-rechargeable, that contain hazardous components including lead, nickel, silver, lithium, mercury and other metals. Lead acid batteries also may also be managed under these regulations.

## **4.0 Collection of Universal Wastes**

Universal waste at the University of New Haven is collected and managed by the Facilities Department and in some cases the Information Technology (computers and monitors) Department. Spent fluorescent bulbs and batteries to be disposed of as universal waste are collected in the basement of Winchester Hall. The University of New Haven has taken steps to assure compliance with all applicable local, state and federal Universal Waste regulations. The following Universal Wastes are managed as such:

- Used electronics inclusive of computers, monitors, televisions and any other item containing a circuit board or are stored and handled within the Information Technology department. These items at the university are recycled through a University approved contractor.

- Spent fluorescent lamps and bulbs are stored within the Universal Waste collection area in the Winchester Hall basement. Spent fluorescent lamps and bulbs are managed as follows:
  - All spent bulbs are stored in a Universal Waste collection area at the University;
  - All intact used bulbs are placed within a cardboard box;
  - Spent bulbs are stored in a manner as to not promote breakage;
  - Each box containing spent fluorescent lamps and bulbs is labeled with a minimum the words universal waste and “spent fluorescent bulbs”;
  - All spent bulb boxes are kept closed unless bulbs are being actively added to the container; and
  - A start accumulation date is placed on each bulb box as the first spent bulb is added. The container is then kept on-site for up to a year before the University’s waste vendor removes these boxes from site.
  - Broken fluorescent bulbs and lamps are collected as hazardous waste in a container labeled “hazardous waste, broken fluorescent bulbs”. These drums are kept sealed unless actively adding waste to them. Full hazardous waste containers of broken fluorescent bulbs are kept on-site for up to 180 days before being removed by the University’s hazardous waste vendor.
- Thermostats containing mercury and other mercury containing equipment can be collected and managed as universal waste. In the event a mercury thermostat or other mercury containing equipment was to become waste, it would be collected in the facilities department universal waste collection area in a properly labeled, closed container able of containing spills.
- Unused pesticides that have been recalled or banned from use, are obsolete, have become damaged, or are no longer needed (due to changes in cropping patterns or other factors) are considered universal wastes. The University does not produce this waste stream.
- Batteries at the University are collected as universal waste and collected in a way that prevents release. Batteries are stored within the Facilities Department universal waste collection area in appropriately marked sealed containers. Batteries are sorted by type and segregated in a manner so as not to have different battery types in the same container.
  - Batteries must be labeled with a universal waste label and the type of battery.
  - Tape or Bag the positive terminal of the battery in order to protect it from other battery terminals.
  - A start accumulation date of when the battery became waste must be written on the universal waste label.

## 5.0 Labeling

All universal waste at the University of New Haven must be labeled with a universal waste label. The label must be filled out to include a description of the waste and be labeled with the date the item became a waste. Sample waste label below:

The image shows a sample universal waste label form. The form is titled "UNIVERSAL WASTE" in large, bold, black letters at the top. Below the title, there are several fields for information to be filled out. The fields are: "DESCRIPTION" (with a pre-filled example: "Non-DOT Non-RCRA Regulated Material"), "Non-PCB Ballast", "ACCUMULATION START DATE" (with a yellow highlight), "SHIP DATE", "GENERATOR NAME" (with a pre-filled example: "University of New Haven"), "ADDRESS" (with a pre-filled example: "Environmental Health & Safety Department 300 Road"), "CITY" (with a pre-filled example: "West Haven"), "STATE" (with a pre-filled example: "CT"), "ZIP" (with a pre-filled example: "06516"), "PHONE" (with a pre-filled example: "(203) 932-7000"), "APPROVAL CODE", and "DOCUMENT NO." (with a pre-filled example: "012345678 FILE"). The form is bordered by a decorative pattern of small icons.

## 6.0 Universal Waste Accumulation Time Limit

Universal waste may not be accumulated for more than one year from the date that it became waste. Federal regulations require that the waste generator prove the length of time the universal waste has been accumulated. Personnel responsible for the generation and handling of universal waste, such as lamps, must label each universal waste, or alternatively, each container of universal waste with the date that the universal waste was placed in the container. Universal waste or universal waste containers shall be managed so that universal waste is not accumulated for more than one year on-site at the University.

## 7.0 Campus Spill Reporting and Notification

In the event of a universal waste spill the party noticing the spill should immediately notify University of New Haven Police at 203.932.7070. The caller must be able to state the location, product spilled and an approximate volume. Other steps to be taken in the event of a spill are as follows:

- Remove people including the caller from the immediate spill area;
- Assure that others are aware of the spill and do not access the spill area;
- Do not vacuum up spill or attempt to clean-up on your own; and
- All spilt universal waste must be collected, labeled and managed as hazardous waste.

## **8.0 Managing Contractor Universal Waste**

The University of New Haven requires all contractors to follow local, state and federal regulations for collection, management and disposal of universal wastes. Contractors are required to dispose of all universal waste with approved universal waste handlers and supply the University with all shipping papers of these wastes.

## **9.0 Administrative Duties**

A copy of the University of New Haven Universal Waste Management Plan as well as Universal Waste Bill of Ladings may be found in the Associate Vice President of Public Safety and Administrative Services office.

## **10.0 Training**

The University of New Haven trains all affected staff on the collection and disposal of universal waste on an annual basis. All training records can be accessed in the Associate Vice President of Public Safety and Administrative Services office upon request.