SUNY OSWEGO FACILITIES SERVICES

ENVIRONMENTAL HEALTH AND SAFETY

UNIVERSAL WASTE POLICY

Procedure Number	Revision Number	Effective Date
EHS-UWP-01	00	January 9, 2020
Approval Signature J.Mitchell Fields AVP- Facilities Services		Approval Date 1/10/2020

1. PURPOSE

The SUNY Oswego Universal Waste Policy (UWP) establishes a formal written program for the safe and compliant collection, storage, and disposal of universal waste.

Universal waste is generated in numerous locations and is handled by University employees. Universal waste is a subcategory of hazardous waste that poses low risk to human health when handled and transported safely. It consists of batteries, pesticides, mercury-containing equipment, and lamps (light bulbs). The University recognizes that there are potential hazards associated with the use and disposal of universal waste materials. This policy is based on the federal regulation 40 CFR part 273 and state regulation 6NYCRR 374. It regulates the handling and disposal of universal waste.

2. SCOPE

The UWP applies to all SUNY Oswego facilities using, storing, or handling universal waste. It describes the proper use and handling procedures required by staff, contractors, and other personnel working with universal waste at SUNY Oswego. Universal waste is a potentially hazardous waste that is considered "universal" to all work environments. This policy applies to all University generated universal waste. It applies to the departments who generate or handle the waste and the employees who work with it.

3. RESPONSIBILITIES

3.1 **Area Supervisor** (Custodian, Electrician, Transportation):

3.1.1 Manage the universal waste program in their area of responsibility in a safe and compliant manner, consistent with regulations and this procedure.
3.1.2 Ensure that responsibilities of this procedure are assigned to individuals within the department.
3.1.3 Ensure all employees assigned to manage universal waste receive proper instruction and training on universal waste handling procedures.
3.1.4 Collect and store universal wastes according to universal waste regulations and this policy.

3.2 Environmental Health and Safety (EHS):

3.2.1 Assist in providing guidance and monitoring regulatory compliance.
3.2.2 Develop universal waste training and provide to affected staff.
3.2.3 Provide technical support to departments and employees when questions arise with regards to universal waste.
3.2.4 Pick up and properly dispose of any mercury containing equipment.
3.2.5 Provide guidance for clean-up and disposal of mercury-containing spills.
3.2.6 Universal Waste Procedure review.
3.2.7 Conduct field audits.
3.2.8 Contact the universal waste disposal contractors to pick up and dispose of universal wastes within the one-year accumulation time limit.

4. WASTE CATEGORIES

4.1. Batteries

4.1.1. A device consisting of one or more electrically connected electrochemical cells which is designed to receive, store, and deliver electric energy. The term battery also includes an intact, unbroken battery from which the electrolyte has been removed. Low or non-mercury containing alkaline and carbon zinc batteries can be recycled or disposed of as non-hazardous solid wastes. Examples of universal waste batteries are:

- Sealed lead acid
- Nickel-cadmium
- Lithium ion
- Mercuric oxide
- Silver oxide
- Rechargeable batteries

4.2. Lamps

4.2.1. The bulb or tube portion of an electric lighting device. Examples of universal waste

lamps are:

- Fluorescent
- High intensity discharge
- Neon
- Mercury vapor
- High pressure sodium
- Metal halide lamps

4.3. Pesticides

4.3.1. Unused/cancelled pesticides subject to voluntary recall under section 19(b) of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act). Section 19(b) directs the EPA to order a recall if the recall is necessary to protect health or the environment. It is not waste until the decision is made to discard it.

4.4. Mercury Containing Equipment

4.4.1. A device or part of a device (excluding batteries and lamps) that contains elemental mercury integral to its function. This does not include cathode ray tubes nor mercury waste generated as a by-product. Examples of mercury containing equipment are:

- Thermometers
- Manometers
- Barometers
- Relay switches
- Mercury reg. meters
- Pressure gauges
- Sprinkler system contacts

5. WASTE HANDLING

5.1. Universal Waste Lamps

5.1.1. Lamps shall be placed in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps.

5.1.2. Containers shall remain taped closed unless adding or removing lamps.

5.1.3. Containers shall lack evidence of leakage or damage that could cause leakage under reasonably foreseeable conditions.

5.1.4. Flaps should not be ripped off of a cardboard lamp container as this makes it harder to close.

5.1.5. A universal waste label shall be affixed to all waste containers and be marked with the contents of the container and the accumulation start date.

5.1.6. If a lamp breaks, it is now considered hazardous waste rather than universal waste

and shall be dealt with according to hazardous waste regulations and by calling EHS.

5.1.7. When the waste container is full, submit a TMA work order to request a pick-up.

5.1.8. EHS will call the current lamp disposal contractor to pick up and dispose of the waste.

5.2. Universal Waste Batteries

5.2.1. Universal waste batteries shall be stored in an approved plastic container with the proper universal waste label affixed and filled-out with the contents and the accumulation start date.

5.2.2. Rechargeable batteries should be individually packaged in plastic baggies to protect them from contact with other batteries, which can lead to the battery shorting out and creating a fire.

5.2.3. Batteries may be stored individually, but if stored individually each individual battery shall have a universal waste label affixed.

5.2.4. When batteries are stored in a container, cover positive and negative terminals using tape or similar material prior to placing in the container.

5.2.5. If a battery shows evidence of damage or leakage, it is considered a hazardous waste and shall be managed according to Hazardous Waste Procedure. Request for Hazardous Waste pick up form shall be filled out to schedule a pick-up of the battery.

5.2.6. SUNY Oswego EHS Department will conduct monthly checks and pick-ups at the battery recycling station locations on campus. Should you need a pick-up between checks, place a work order in the TMA system requesting pick-up.

5.2.7. SUNY Oswego EHS Department shall pick-up and properly store the batteries until they are picked up by the contractor for disposal.

5.2.8. See Appendix A for Battery Recycling Center Locations.

5.3. Universal Waste Pesticides

5.3.1. Universal waste pesticides shall be stored in a container that remains closed, structurally sound, compatible with the pesticide.

5.3.2. The container shall lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

5.3.3. The container shall be affixed with a universal waste label, the name of the pesticide product, and the date of the start of accumulation.

5.3.4. If the pesticide is used completely, it will not be disposed of via universal waste methods.

5.4. Universal Waste Mercury Containing Equipment

5.4.1. Mercury containing equipment shall be managed in a way that prevents releases of any universal waste or component of a universal waste.

5.4.2. Mercury containing equipment shall be properly affixed with a universal waste label and filled out with the accumulation start date.
5.4.3. A work order shall be placed in the TMA system to request pick-up of mercury containing equipment.
5.4.4. If mercury is spilled, contact shall be made to SUNY Oswego Police #315 -312-5555, who will then contact EHS.

6. LABELING

6.1. Universal waste containers shall be labeled with the following information:
6.1.1. The words "Universal Waste-(type)(s)"
6.1.2. Contents of the container "Universal Waste – Batteries" or "Universal Waste – Lamps"
6.1.3. The date the waste was first accumulated in the container
6.2. Universal waste batteries are not required to be stored in a container, but if they are not in a container each individual battery shall be labeled.
6.3. The universal waste - Lamp label used at SUNY Oswego:

UNIVERSAL WASTE - LAMP(S)

- **Keep box closed.**
- **Do not place outside.**
- **Do not break lamps.**
- **Broken lamps must be managed as hazardous.**
- **Number of lamps:**_____

DATE FIRST LAMP PLACED IN CONTAINER

__/__/__

SUNY Oswego Dept. of Environmental Health & Safety

7. ACCUMULATION

7.1. Any site where universal waste is collected is considered an accumulation site, regardless of the amount of waste collected there.
7.2. Universal waste may be accumulated for no longer than a year from the date the universal waste was first generated or received.
7.3. The handler shall demonstrate the length of time the waste has been accumulating by either writing the accumulation start date on the waste label or by keeping an inventory system.

8. WASTE HANDLER STATUS

8.1. In universal waste management, there are two types of handlers: small quantity waste handlers and large quantity waste handlers.

8.1.1. A small quantity waste handler is generator of universal waste who does not accumulate more than 11,000 pounds of universal waste at any time.

8.1.2. A large quantity waste handler is a generator of universal waste who accumulates 11,000 pounds or more of universal waste at any time. If given, this designation retained through the end of the calendar year in which the 11,000-pound limit is met or exceeded.

8.1.3. The SUNY Oswego is considered a small quantity universal waste handler.

9. TRANSPORTATION AND SHIPPING

9.1. A small quantity handler of universal waste is prohibited from sending or taking universal waste to a place other than another universal waste handler, a destination facility, or a foreign destination.

9.2. Universal waste shall be transported by a qualified universal waste transporter. A universal waste transporter is a person engaged in the off-site transportation of universal waste by air, rail, highway, or water.

9.3. If a universal waste being offered for off-site transportation meets the definition of hazardous materials under 49 CFR parts 171 through 180, a small quantity handler of universal waste shall package, label, mark and placard the shipment, and prepare the proper shipping papers in accordance with the applicable Department ofTransportation regulations under 49 CFR parts 172 through 180.

10. RESPONSE TO RELEASE

10.1. All releases and other residues from universal wastes shall be immediately contained and reported to EHS.

10.2. Releases can be cleaned up by properly trained personnel using PPE and a spill kit if the spill is small enough to handle. If personnel cannot handle the spill, call University Police at 315-312-5555 for EHS to respond and provide assistance.

10.2.1. Broken mercury-containing bulbs or equipment shall be placed in a sealable plastic bag labeled with the words "Hazardous Waste – Broken Mercury Bulb or Equipment". Please notify EHS of a broken mercury-containing bulb or equipment for hazardous waste removal and complete request for Hazardous Waste pick up form. Donot vacuum broken mercury-containing bulbs or equipment.

10.2.2. Leaking batteries shall be placed in a closed, leak-proof container and labeled with the words "Hazardous Waste – Leaking Battery". Please notify EHS of leaking battery for hazardous waste removal and complete request for Hazardous Waste pick up form.

10.3. If chemical exposure to skin or eyes has occurred, the affected personnel should go to

the nearest safety shower and/or eyewash station to flush skin and/or eyes for 15 minutes. If inhalation hazard, get to fresh air immediately and seek medical attention.

10.4. Any material from the release, including supplies such as absorbents and gloves, determined to be hazardous waste shall be managed in compliance with all applicable requirements of 40 CFR parts 260 through 272.

11. TRAINING – DO WE HAVE THE TRAINING?

11.1. A small quantity waste handler shall ensure that all staff who handle or are responsible for managing universal waste are informed on the proper handling and emergency procedures appropriate to the specific universal waste(s) they handle.

11.2. Employees whose responsibilities include universal waste shall review the Universal Waste Training.

11.3. Training shall include the following:

- 11.3.1. Background and Procedure Information
- 11.3.2. Waste Accumulation/ Handling Procedures
- 11.3.3. Waste Handler Status
- 11.3.4. Transportation and Shipping
- 11.3.5. Waste Labeling Requirements
- 11.3.6. Response to Release
- 11.3.7. University Procedures for Specific Universal Wastes

12. FREQUENCY OF REVIEW

12.1. This procedure shall be reviewed at least every three years and updated as needed to meet applicable regulation changes.

13. REFERENCES

13.1. US EPA. Universal Waste Regulations Title 40 CFR 273

13.2. 6NYCRR 374

13.3. US EPA. Overview of the Universal Waste Program

13.4. US DOT. Transportation Regulations 40 CFR 172

https://www.dec.ny.gov/chemical/99942.html

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Revision History Table

History	Effective Date

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APPENDIX A

BATTERY RECYCLING LOCATIONS

ACADEMIC BUILDING:	LOCATION:
Marano Campus Center	Front Desk
Commissary	
Culkin	
Hewitt Union	
King	
Laker	
Lanigan	Front Desk
Lee	
Mahar	
Park	
Parking office	
Penfield	
Poucher	
Rice Creek	
Rich	
Romney	
Sheldon	Front Desk
Shineman	
Tyler	
Wilber	
University Police	Front Desk

Please use these containers to recycle University generated used batteries from your on-campus location. Do not use these containers for your personal used batteries. Used batteries from your off-campus locations can be recycled FREE OF CHARGE at the retail establishment from which they were purchased http://www.dec.ny.gov/chemical/72065.html.

Do not place any other items in the container besides used batteries.
If you cannot locate the 5 gallon Battery Recycling bucket.
Please contact the Office of Environmental Health & Safety at
(315) 312-2872 OR 3157 for additional information.

Updated December 2019

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BATTERY RECYCLING LOCATIONS

HOUSING BUILDING:	LOCATION:
Cayuga	Front Desk
Cooper	
Funnelle	Front Desk
Glimmer	
Hart	Front Desk
Johnson	
Lakeside Dinning	
Littlepage	
Lonis	
Mackin	Front Desk
Moreland	
Oneida	Front Desk
Onondaga	Front Desk
Parthfinder Dining	
Riggs	Front Desk
Scales	Front Desk
Seneca	Front Desk
Service Building	
Sunset	
Village	Front Desk
Waterbury	Front Desk

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APPENDIX B

Universal Waste Lamp Satellite Accumulation Area Locations

BUILDING:	LOCATION: Room
Convocation Center	129
Culkin	2
Hewitt Union	35H
King	Basement boiler room
Laker	1
Lanigan	28E
Lee	B24
Mahar	1
Park	116A and Loading dock
Parking office	West side of room
Penfield	20
Marano Campus Center	154
Rice Creek	9
Rich	23
Romney	16
Sheldon	121
Shineman	G73
Tyler	34B
Wilber	195
Walker	178
University Police	L120A
Building 12	212B

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Universal Waste Lamp Satellite Accumulation Area Locations

HOUSING BUILDING:	LOCATION: Room
Cayuga	JST-BSW
Funnelle	48-JSR-BNE
Hart	JSR-B
Johnson	BO1
Lonis	LO-JSR-G
Mackin	LO-JSR-G
Moreland	LO-JSR-G
Oneida	JSR-BCN
Onondaga	JSR-BN
Riggs	B12
Scales	BO2
Seneca	JSR-BC
Village	B511
Waterbury	B28

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APPENDIX C

Fluorescent Light Ballasts Procedure

Whenever fluorescent light ballasts are changed out, the old ones will be sorted and stored in a closed container.

The ballasts will be sorted and handled as follows:

- Electronic ballasts (no dielectric or cooling oils) – place in container for scrap metal recycling and place near the scrap metal recycling bins. Label "electronic ballasts"
- Any ballasts with dielectric or cooling oils that are labeled "No PCBs" – place in container or drum labeled "Non-PCB ballasts" for recycling
- Ballasts with dielectric/cooling oils with no information about PCB on the label – place in container labeled "PCB Ballasts". Ensure that the container is securely closed and that there is no leakage outside the container.
- The EHS department will further inspect the PCB Ballasts and Non-PCB ballasts to ensure they are correctly sorted. EHS will also determine if any PCB ballasts meet the definition of a hazardous waste according to NYSDEC regulations. Any PCB ballast that is larger than 200 cubic inches or any ballast known to have more than 50 ppm PCB will be immediately transported to the Central Accumulation Area (G87). It will be placed in a container labeled: Hazardous Waste, PCB ballasts and dated the first time a ballast is added to the container.

The ballasts will be recycled as follows:

Electronic and non-PCB ballasts will be sent for recycling to an approved scrap metal recycling vendor.

PCB ballasts less than 200 cubic inches or less than 50 ppm PCB will be accepted for recycling by the College's approved universal waste vendor.

PCB ballasts classified as a hazardous waste will be handled by the College's approved hazardous waste vendor and manifested according the State regulations.

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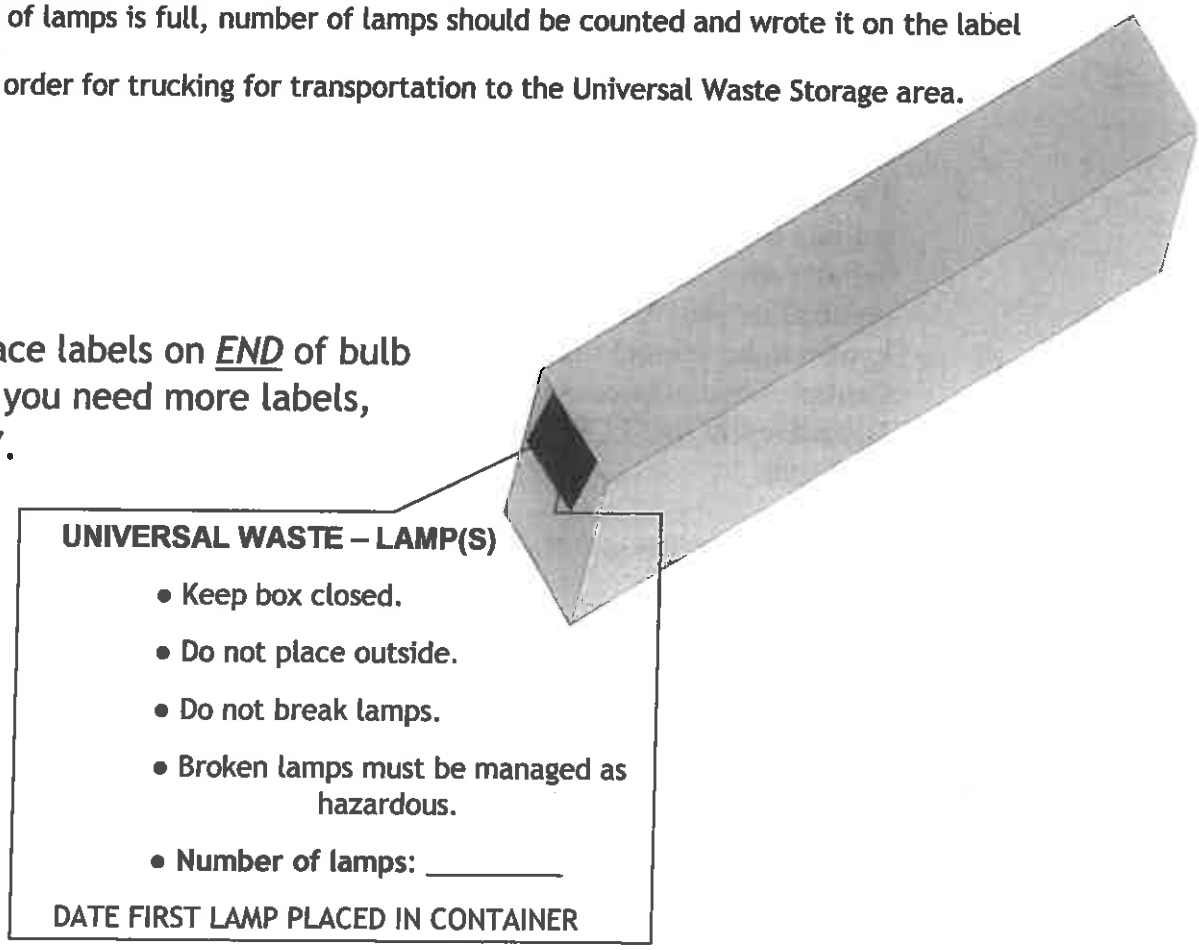
APPENDIX D

Used Fluorescent Lamps Procedure

- When a lamp is taken out of service, it must be immediately placed in their original box or size-appropriate container to protect lamps from breakage during storage and transport. (Appropriate containers - Example, do not store 2 foot bulbs along with 4 foot bulbs).
- Affix a "Universal Waste-Used Lamps" label on each box or container. Contact EH&S at 3157 for labels.
- Date the label when the first used lamp is added.
- While accumulating lamps, the containers and/or packages must be kept closed and stored in the designated "Satellite Accumulation Area for Universal Waste" in your building.
- Once a box of lamps is full, number of lamps should be counted and wrote it on the label and sealed.
- Place work order for trucking for transportation to the Universal Waste Storage area.

Please place labels on *END* of bulb boxes. If you need more labels, call x3157.



If a bulb is broken, it must be managed as hazardous waste. Broken lamps and clean-up debris are to be placed in a lined puncture-proof container (such as cardboard box) and labeled "Hazardous Waste – Broken Fluorescent Light Bulb". Keep the container closed. Date the label when the first broken lamp is added. Once box is full/3 months from first dated, place a work order for EHS to pick up.