



Universal Waste Policy

Scope

This policy is intended to provide guidance in the proper handling and disposing of universal waste (UW). For the purposes of this policy UW includes batteries (with the exception of lead acid batteries), lamps (including fluorescent and HID), pesticides, mercury thermostats, and mercury containing devices.

Purpose

The purpose of this policy is to insure that UW(s) are properly handled and disposed of all in accordance with EPA 40 CFR 273 and 25 PA Code chapter 266b.

Note: For the purposes of this policy, Elizabethtown College will be considered a Small Quantity Handler of Universal Waste (SQHUW). A small quantity handler is defined as someone that accumulates less than 5,000 pounds of UW at any one time.

Accumulation Time Limits

- The College will place UW in containers that are labeled with the earliest date that any UW was placed in the container.
- The UW in the container will not accumulate for more than one year; typically, universal waste is removed every semester (every six months).

Employee Training

The College will inform all employees who handle or have responsibility for managing UW of the proper handling and emergency procedures appropriate for UW.

Release Response Requirements

There is an emergency response center in the immediate area of the UW accumulation site. All UW(s) and their residuals will be immediately cleaned up and placed in a sealed, labeled container and treated as hazardous waste.

Prohibitions

The College will not dispose of, dilute or treat UW except as indicated under "Management Practices for Universal Waste" listed below.

Off-site Shipments

UW that the College generates will be properly packaged and transported off site by a certified UW transporter to another UW handler.

Recordkeeping

While not required, the College will maintain Bills of Lading for all UW shipments.

MANAGEMENT PRACTICES FOR UNIVERSAL WASTES

Batteries

- Damaged or leaking batteries will be placed in a sealed container and treated as a hazardous waste.
- Batteries will be sorted by type.
- Containers of batteries will have the label "Universal Waste – Batteries – Date: _____" placed on it
- Alkaline, Nickel/Cadium and Lithium batteries will be collected and moved to the Universal Waste station at the Brown Building.
- Used batteries generated at the Brown Building or Pole Barn shall be placed in the appropriate containers in the universal waste storage area.

Pesticides

- Pesticides will be placed in containers that are closed and remain so, are structurally sound, compatible with the pesticide in it, and which lack evidence of leaks or damage that could cause leaks.



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Environmental Affairs

- Damaged containers of pesticides shall be overpacked in containers that meet the above standards. Spilled pesticides will be contained, cleaned up, placed in a labeled, sealed container and treated as hazardous waste.

Lamps

- Lamps will be handled and stored to prevent breaking, leaks or damage.
- Broken lamps will be cleaned up immediately, placed in a sealed container, labeled and treated as hazardous waste.
- Containers where used lamps are stored must be structurally sound, closed, and labeled as "Universal Waste – Fluorescent Bulbs – Date:_____."
- New florescent bulbs may be stored in the closets in the containers they were shipped in or an equivalent container. Used bulbs must be stored in a similar container and moved to the Universal Waste area in the Brown Bldg the day they were changed.
- Each building will have one of the ES closets designated as an area where new bulbs can be obtained and used florescent bulbs may be stored. Both containers must be kept closed when not being used. The new bulbs need only be stored in a location and way so that they don't get broken. The box containing the used bulbs must be labeled ""Universal Waste – Fluorescent Bulbs – Date:_____ " (the date must reflect the date the first bulb was placed in the box). The used bulbs must be taken to the Brown Bldg when the box is filled, or at least annually.
- Boxes of new bulbs must be open in a way to maintain the "lid". With the box standing on end facing you, take a utility knife and cut the box beginning at the right rear corner down to the front of the box at a 45 degree angle. Repeat the process on the left side of the box. Finally cut horizontally across the face of the box. The top/lid should be held on by the intersection of the top and the rear of the box. This procedure results in a box with a lid. (Note: boxes should no longer be opened by tearing the flaps off the top of the box.)

Mercury-Containing Devices

- Mercury-containing devices that show signs of damage or leakage will be placed in a structurally sound, sealed container.
- If mercury is spilled it shall be appropriately cleaned up, placed in a sealed container, labeled, and treated as a hazardous waste.
- Removal of ampules will be done in a manner to prevent damage or breakage to the ampule of mercury.
- Removal of ampules will be done in or over the container.
- Removal of ampules will be done in the UW accumulation site.
- Employees will be trained in the proper mercury handling and emergency procedures.
- UW containers will be labeled as "Universal Waste – Mercury Containing Devices – Date:_____."
- When mercury-containing devices such as mercury switches, thermometers, etc. are ready for disposal they shall be placed in the 5 gallon container marked "mercury containing devices" in the universal waste storage area.

Lead/Acid Batteries – Used lead/acid batteries will be stored on the mobile containment outside the garage in the Brown Bldg warehouse. They will be stored in a non conductive structure over a secondary containment with the terminals protected. Before the batteries are placed into storage the terminals must be sprayed with the rubber compound provided.

The batteries will be picked up by Interstate Battery, a certified transporter, twice annually and returned to their location where they are recycled/reclaimed.

Document History

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