

## 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 Connecticut Department of Environmental Protection (CT DEP) 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 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. Failure on the part of the employees to follow the policies and safety requirements of this Plan may result in disciplinary action.

## 2.0 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.

### 2.1 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 others metals. Lead acid batteries also may also be managed under these regulations.

### 3.0 Collection of Universal Wastes

Universal wastes at the University of New Haven are collected and managed by the building and grounds department and in some cases the Information Technology (computers and monitors) department.

Spent fluorescent bulbs are stored within two locations in the electrical shop located in the basement of Winchester Hall. Batteries to be disposed of as universal waste are also kept within this same location.

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 third party vendor.
- Spent fluorescent lamps and bulbs are stored within the Universal Waste collection area in the building and grounds electrical shop. 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 card board 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. The University of New Haven currently does not produce this waste stream. In the event a mercury thermostat or other mercury containing equipment was to become waste, it would be collected in the building and grounds 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 of New Haven does not produce this waste stream.
- Batteries at the University of New Haven are collected as universal waste and collected in a way that prevents release. Batteries are stored within the building and grounds universal waste collection area in appropriately marked sealed containers. Batteries are sorted by type and segregated in a manner as to not have different battery types in the same container.
  - Batteries must be labeled with a universal waste label and the type of battery.
  - A start accumulation date of when the battery became waste must be written on the universal waste label.

#### 4.0 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:



A sample universal waste label with a purple header and a white body. The header contains the text "UNIVERSAL WASTE" in bold white letters. The body contains five lines of text, each followed by a horizontal line for writing: "CONTENTS", "ACCUMULATION START DATE", "SHIPPER", "ADDRESS", and "CITY, STATE, ZIP".

## **5.0 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 wastes, 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.

## **6.0 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 203.932.7014. 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 a hazardous waste.

## **7.0 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 wastes with approved universal waste handlers and supply the university with all shipping papers of these wastes.

## **8.0 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's office.

## **9.0 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's office upon request.