

**GWYNEDD MERCY UNIVERSITY
UNIVERSAL WASTE MANAGEMENT
PROGRAM**

Developed in 2006 in accordance with
Title 40 CFR Part 273 and 25 Pa. Code Part 266b
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Revised 2013 Michele Brown
University Update 2014

Gwynedd Mercy University Universal Waste Management Program

This document meets the requirements outlined in the EPA 40 CFR Part 273 and the State 25 PA Code. It is recognized by the following parties of Gwynedd Mercy University as an acceptable program that will be implemented upon signature date.

Kevin O'Flaherty

Kevin O'Flaherty
Vice President for Finance and Administration

01/27/14

Date

Michele Brown

Michele Brown
Environmental Safety and Laboratories Manager

2-4-14

Date

Joe Moll

Joe Moll
Director of Physical Plant

1-25-14

Date

GWYNEDD MERCY UNIVERSITY UNIVERSAL WASTE MANAGEMENT PROGRAM

HISTORY AND REGULATIONS

The Resource Conservation and Recovery Act (RCRA) mandates under Subtitle C the safe management of hazardous waste from the point of generation to the point of deposition. EPA promulgated a streamlined management program in 1995 for certain types of hazardous waste, known as universal waste. This program was designed to provide an alternate set of regulations that reduce the regulatory burden on storage and recordkeeping while managing these wastes in a way that prevents their release into the environment.

This document incorporates the federal regulations for universal wastes found in Part 273 of Title 40 of the Code of Federal Regulations (40 CFR) and the state regulations found in Chapter 266b of Title 25 of the Pennsylvania Code (25 Pa. Code) for the development and implementation of a written universal waste management program for Gwynedd Mercy University. Additional regulations acknowledged by this document in which Gwynedd Mercy University may be restricted are found in 40 CFR 260-266 and 270 and 25 PA. Code Chapters 260a-266a, 268a, and 270a.

This Universal Waste Management Program (UWMP) is designed to provide each employee, student, and subcontractor working onsite the knowledge of regulatory restrictions, compliance guidelines, and general information on the identification, handling, storage, and disposal of all universal waste generated on this campus.

PROGRAM OUTLINE AND BEST MANAGEMENT PRACTICES (BMP)

Gwynedd Mercy University Status. GMERCYU is currently classified as a Small Quantity Handler of Universal Waste (SQHUW). This classification dictates that we accumulate no more than 5,000 kilograms (kg) of total universal waste at any one time with accumulation storage limits of one year. SQHUW are required to manage universal waste in a way that prevents its release into the environment and must distribute basic waste handling and emergency information to their employees to ensure that their staff are aware of proper handling and emergencies. This status is re-evaluated each calendar year.

Program Responsibility. The Director of Physical Plant in cooperation with the Environmental Safety Manager and Vice-President of Finance and Administration is responsible for the following and will:

- ❖ Oversee the collection, containment, and labeling of all identified wastes
- ❖ Designate a campus central storage area (CSA) along with satellite accumulation areas (SAA) in buildings where storage is necessary

- ❖ Monitor the status of the CSA and SAA through weekly inspection logs or designate at least one responsible person to oversee the inspections which does include the proper labeling and dating of each container
- ❖ Arrange for offsite disposal by a licensed vendor
- ❖ Maintain records of inspections, inventories, training, manifests, certificates of recycling, and annual reports
- ❖ Provide guidance, materials, and training to employees

Universal Waste Description. The federal universal waste regulations include hazardous waste batteries, mercury-containing equipment, pesticides, and lamps. Items that still have product value or that are still being used are not wastes and therefore, are not subject to the regulations under RCRA. Only material identified as a hazardous waste that meets the definition of battery, mercury-containing equipment, pesticide, or lamp in Part 273 can be managed under this program. GMERCYU considers the following universal waste:

- ❖ **Batteries:** any device consisting of one or more electrically connected electrochemical cells that is designed to receive, store, and deliver electric energy containing nickel cadmium, metallic hydrides, silver, and commercial lead acid. Alkaline or dry cell, lithium (if containing less than 5 grams/cell), and zinc batteries are exempt and may be disposed in the regular garbage. Broken or leaking batteries may no longer considered universal waste and upon evaluation, may be disposed of as hazardous waste.

BMP: Waste batteries should be stored by type in large enough containers to prevent leaks; CSA should be well ventilated; discharge batteries when possible to remove charge; do not store near strong bases; and the battery or the container filled with batteries must be labeled as “*waste batteries.*” Batteries should be sent for recycling or reclamation.

- ❖ **Fluorescent Bulbs/Tubes:** any bulb, tube, or lamp portion of an electric lighting device containing neon, mercury, sodium, lead, and metal halides; upon breakage of a bulb/lamp/tube, it may not be considered universal waste and depending on the amount, may be disposed as hazardous waste.

BMP: Collect bulb/lamps/tubes in the proper size box to completely contain them in cases of breakage (the original box is ideal); transport bulbs/tubes carefully to minimize breakage; boxes of used bulbs may be held in the SAA for no more than 365 days upon which they will be transported to the CSA and disposed on a 30-day cycle; containers will be properly sealed, labeled with “*waste bulbs or lamps*” and will not leave the campus except under manifest by a licensed transporter. All mercury-containing (silver-end) bulbs should be replaced with non-mercury (green-end) bulbs and recycled.

- ❖ **Pesticides:** any substance intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant. Unused pesticides are not considered universal waste and must not be stored in the CSA with “waste pesticides.”

BMP: storage of pesticides must be in a CSA only; containers must be closed, structurally sound, and compatible with the pesticide; if original container is not as above, it must be held in secondary containment; the container must have the label that accompanied the product as sold and with the words “*waste pesticides*”; SDS must be available in the CSA for each pesticide.

- ❖ **Mercury Thermostats and Mercury-Containing Devices:** any temperature control device that contains metallic mercury in an ampoule attached to a bimetal sensing element and any product or component of a product (excluding batteries) which contains elemental mercury that is necessary for operation of the device such as thermometers, barometers, manometers, sphygmomanometers, temperature and pressure gauges, and switches.

BMP: remove ampoules only in or over secondary containment in a manner designed to prevent breakage; ensure that a mercury clean up system is available for any size spill; train employees in proper waste mercury-handling and emergency procedures; store devices in closed, non-leaking containers that are in good condition; device or container must be labeled with “*waste mercury device*.”

Storage and Disposal Requirements. Satellite (SAA) and Central (CSA) Accumulation Areas must remain locked and visibly marked: “Universal Central Storage.” SAA and CSA must have ample room for proper storage, temperature regulated, with spill kits or spill containment equipment readily available. SDS must be located and readily available in each SAA when needed and always in the CSA for stored items. Areas should be monitored weekly by trained personnel for correct signage, leaking containers, and past-date containers. A log of these inspections must be maintained in a central location. All items contained in the SAA and CSA must be labeled with the following: “start date”, “end accumulation date”, and “waste type.” Upon reaching the 365 storage day limit or when the container is full, items stored in the SAA must be transferred to the CSA and disposed on a 30-day cycle with the appropriate vendor. Personal Protective Equipment (PPE) along with the appropriate spill kits, absorbent pads, and absorbent agents such as litter, should be readily available in each SAA.

Training Requirements. An SQHUW must inform all employees who handle or who have responsibility for managing universal wastes of the proper handling and emergency procedures appropriate to the types of universal wastes handled at the facility. Although EPA does not require that training records be kept, the Colleges and Universities Best Management Practices (CUBMP) recommends that employee training documents be kept for at least 3 years in which GMERCYU agrees and will comply.

Document Requirements. An SQHUW is not required by the EPA to keep records of universal waste shipments. However, under the CUBMP, it is recommended that all shipping manifests, inventories, inspections, employee training documents, and certificates of recycling be maintained for at least 3 years in which GMERCYU agrees and will comply.

Emergency Guidelines. In the event of a spill or accident, the area should be safely secured when possible and the Director of Physical Plant should be notified. The situation will be evaluated based on the type of breakage or spill and the size of the area contaminated upon which the following will occur:

- ❖ If the spill or breakage is determined to be small enough that it may be safely and completely removed or cleaned with no immediate harm to personnel and no future exposure risk to personnel once it has been removed, then only trained personnel using the appropriate PPE (nitrile gloves, goggles, chemical-proof apron, and face mask) will follow the guidelines for safe removal and clean up of the contaminated area. A containment device must be available that seals tightly, is structurally sound, and is compatible with its contents. The container must also be labeled with the type of waste and the occurrence date. Depending on the nature of the generated waste, it may still be considered universal waste and if so, will be stored properly in the CSA until the next disposal. An example of such a breakage or spill would consist of 5 or fewer lamps or a leaking battery.

- ❖ In the event of a “reportable condition” which will signify a spill or breakage that has contaminated a large area or one that can not be contained without the potential for physical harm, the Environmental Safety Manager, in coordination with the Director of Physical Plant and Vice President of Finance, will notify the appropriate agency to facilitate the clean up. All waste generated during this process will be considered hazardous waste and will be disposed as such. A reportable condition includes but is not limited to a mercury spill of 3’ or greater or breakage of many lamps.

❖ Campus Emergency Contact Information:

Office	Extension
Campus Emergency:	111
Vice President for Finance/Admin.	21297
Director of Physical Plant	21520
Environmental Safety Manager	21489
Director of Public Safety	21785

❖ PA DEP State and Federal Emergency Contact Information:

Southeast Regional Office

Suite 6010, Lee Park, 555 North Lane

Conshohocken, PA 19428-2233

General: 610-832-6000

Division of Hazardous Waste Management: 610-832-6213

DEP Emergency Hotline: 800-541-2050

DEP General Information: 717-783-2300

EPA Protection Agency Resources

RCRA, Superfund, and EPCRA Hotline: 800-424-9346

Pollution Prevention Information Clearinghouse: 202-260-1023

RCRA Information Center: 703-603-9230

Electronic Resources:

DEP Web Site: www.dep.state.pa.us

EPA Web Site: www.epa.gov