

UNIVERSAL WASTE

Training Module

INTRODUCTION

As mandated by Subtitle C of the Resource Conservation and Recovery Act (RCRA), EPA promulgated regulations governing the safe management of hazardous waste from the point of generation until the point of final deposition. Within these regulations, EPA developed a streamlined management program for certain hazardous wastes, known as universal wastes. The universal waste program provides an alternative set of regulations that reduce the regulatory burden by allowing longer storage of these wastes and reduced recordkeeping.



INTRODUCTION CONT.

- There are four types of universal waste:
 - Batteries
 - Pesticides
 - Lamps
 - Mercury Containing Equipment
- Wright State University (WSU) is considered a Small Quantity Handler of Universal Waste (SQHUW).
 - This means there is less than 5000 kg of universal waste on site at any one time.
 - It also means that WSU is subject to the SQHUW standards.



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- This universal waste training module will explain how to manage the types of universal waste, the accumulation time lines, and emergency response awareness in accordance with federal, state and local regulations.



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Batteries



BATTERY MANAGEMENT

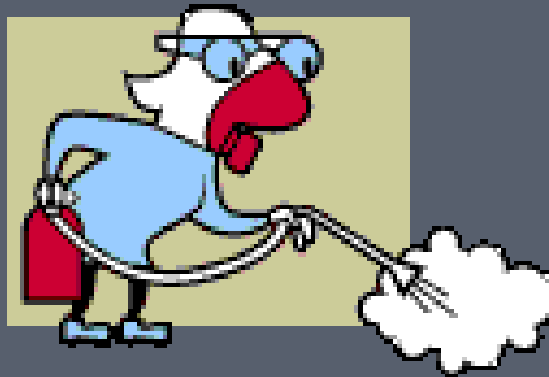
- Regular alkaline batteries (i.e. common AA, AAA, 9-volt, C, or D sized batteries) can be disposed directly into the trash.
- Lead/acid, nickel/cadmium, lithium, and mercury batteries must be managed by EHS. If the battery type is not marked on the battery then mark it in clear legible writing.
- Any other type of battery will be managed on a case by case basis. Call EHS at ext. 3788 if your battery is of a different type than listed above.



BATTERY MANAGEMENT

- If you are not sure of the type of battery contact the manufacturer for this information. Most manufacturers can be located on the web or a mail address will be marked on the battery.
- Contact EHS requesting a pick up. EHS performs routine chemical pick-ups on Friday of each week. If other arrangements for pick up are needed please contact EHS.
- Any unwanted batteries found not to be labeled per these instructions will not be picked up or will be returned and left until properly prepared for pick up.





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Pesticides

PESTICIDE MANAGEMENT

- Pesticides will be handled as a chemical waste by EHS. If you have unwanted pesticides, contact EHS.





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Fluorescent Lights & Ballasts Management

FLUORESCENT LIGHTS & BALLASTS MANAGEMENT

- If you generate fluorescent light ballasts that contain PCB's and/or fluorescent lights, including all mercury vapor, HID, high pressure sodium, and metal halide lamps you are to contact the Physical Plant Work Control Center (ext. 4444) for the nearest Physical Plant Shop and request a pickup. Fluorescent light ballasts and fluorescent lights, including all mercury vapor, HID, high pressure sodium, and metal halide lamps, are to be collected by Physical Plant.



FLUORESCENT LIGHTS & BALLASTS MANAGEMENT

- If you work for Physical Plant and have the responsibility of collecting fluorescent lights or ballasts follow these instructions:
 - Fluorescent lights, including all mercury vapor, HID, high pressure sodium, and metal halide lamps are to be accumulated by Physical Plant personnel and recycled, by Physical Plant, through the university's contracted recycling firm. All packaging of fluorescent lights shall be as instructed by the recycling firm. All fluorescent lights must be sent for recycling. The disposal of any fluorescent lights into the regular trash is prohibited without prior approval from the Department of Environmental Health and Safety.



FLUORESCENT LIGHTS & BALLASTS MANAGEMENT

- Ballasts that contain PCB's are to be accumulated by Physical Plant and ultimately disposed through the Department of Environmental Health and Safety (EHS). Follow these guidelines:
 - Only ballasts containing PCB's must be managed as described here. Non PCB containing ballasts can be disposed as regular solid waste by discarding them in the nearest trash receptacle or dumpster. Any ballast used prior to 1980 is assumed to contain PCB's unless the words "Contains No PCB's" is written on the label. Any ballast manufactured after 1980 (except for dry electric ballasts) should be labeled as not containing PCB's. Dry electric ballasts do not contain PCB's.
 - PCB containing ballasts shall be accumulated in an approved 30 gallon steel drum. Call EHS at ext. 3788 for the drums.
 - All wires shall be clipped off the ballast as close to the ballast as possible.
 - Ballasts should be stacked in the drum to allow for the greatest number of ballasts as possible to be collected in one drum.
 - All full drums must be stored in an area accessible by EHS's truck. When drums are ready contact EHS to request a pickup. Let EHS know if any new drums are needed.
 - Any PCB ballasts found not to be packaged per these instructions will not be picked up or will be returned and left until properly prepared for pick up.



A vertical decorative bar on the left side of the slide, featuring a gradient from light to dark brown. It is adorned with several orange circles of varying sizes, some overlapping the bar and others floating to its right.

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Mercury-containing equipment



MERCURY-CONTAINING EQUIPMENT MANAGEMENT

- Intact mercury-containing equipment can be picked up without any labeling or packaging. Contact EHS requesting a pick up. EHS performs routine chemical pick-ups on Friday of each week. If other arrangements for pick up are needed please call EHS at ext. 3788.
- Broken thermometers and/or other equipment must have the broken end taped closed to prevent the accidental discharge of mercury.
- Call EHS for assistance in cleaning up any spilled mercury or [contact EHS](#) to request a pick up.





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Accumulation Time Limits

ACCUMULATION TIME LIMITS

- WSU may accumulate universal waste for no longer than one year from the date the universal waste is generated.
 - EHS will directly receive batteries, pesticides, and mercury containing devices, therefore it is the responsibility of the Hazardous Waste Manager to ensure the compliance of this one year time line.
 - WSU Physical Plant personnel handling lamps must label their container with the date the first used lamp enters that container. WSU Physical Plant personnel will be responsible for ensuring the compliance of the one year time line for lamps.





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Emergency Spill Response

EMERGENCY SPILL RESPONSE

- The following are steps that need to be taken in the event of a release of any universal waste discussed in this training module.
 - 1) Remove yourself from the area and ensure other personnel cannot come in contact with the release.
 - 2) Call the WSU Police at (937) 775-2111 or Environmental Health and Safety at (937) 775-2215. Environmental Health and Safety is the primary emergency spill response team and will ensure the complete cleanup and removal of the release.
 - 3) Provide as much information as possible including but not limited to contents of spill and scope of release.



CONGRATULATIONS!

You have completed the
Universal Waste Training Module.

Please click the following link to document your
training:

Training Certification

Thank You!