

# Universal Waste Management

## Purpose and Scope

The purpose of this program is to provide information and instructions on proper handling and disposal of universal waste. Proper waste management is important in providing a healthy and safe workplace for faculty, staff, and students, to protect the environment, and to ensure compliance with applicable federal, state, and local laws and regulations. If there are situations that this program does NOT address, or if there are questions regarding the procedures it contains, contact the office of Environmental Health and Safety Department (x3333). For emergency situations, after normal working hours, or weekends, contact Public Safety (x3311).

This program applies to West Chester University employees and contractors who handle universal waste on university property with the exception of electronic waste which is handled by Information Services and Technology Department (x3350).

## Responsibilities

### Environmental Health and Safety (EHS)

- Audit departmental compliance with the requirements of this program.
- Inspect the designated Universal Waste Storage area monthly.
- Determine proper disposal methods for universal wastes.

### Employees

- Properly package, label, and store Universal Waste.
- Transport labeled, securely packaged universal waste containers to designated Universal Waste Storage Trailer or contact EHS for pickup.
- Ensure that all waste being transported and stored for disposal has been properly inventoried.  
[See Appendix A: Universal Waste Inventory.](#)

### Managers and Supervisors

- Ensure staff are storing/handling waste properly.
- Contact EHS prior to renovation activities involving large-scale ballast/lamp removal activities to ensure proper removal, storage, and disposal activities.
- Plan or allow time in project scheduling for proper identification of building materials containing PCBs or other universal waste materials.

## Procedures for Disposal

Universal Waste is a sub-category of hazardous waste, but does not possess the same hazard properties as flammable, toxic, corrosive, or reactive chemicals. All universal waste must be accurately labeled and placed in the proper container prior to drop-off or pick-up for disposal. An inventory of all waste must also be maintained. Universal waste labels and inventory sheets are available through EHS.

**Universal Waste Types:** All universal waste must be segregated by waste type.

Lamps	Batteries	Mercury Containing	Other
Compact Fluorescent	Car/Automotive	Barometers	Aerosol Cans
Fluorescent	Hearing Aid	Blood Pressure Cuffs	Ballasts
High Intensity Discharge (HID)	Lead-Acid	Mercury Switches	PCB Ballast
High Pressure Sodium	Lithium (all types)	Sphygmomanometers	Pesticides
Mercury	NiCad	Thermostats	Oil Based Finishes
Metal Halide	Nickel-Cadmium	Thermometers	Photographic solutions
Light-Emitting Diodes (LED)	Nickel Metal Hydride		
Neon	Rechargeable		
Ultraviolet (UV)	Alkaline		
	Small Sealed Lead-Acid (SSLA)		
	Silver Oxide or Mercury		

### Storage

Waste should be stored in a secure, dry area and in a manner that prevents discharge into the environment. Use proper containment—non-leaking, compatible containers. For example, rechargeable lead acid batteries should be stored so that acids will not leak and enter the environment. Lamps should be protected from breakage and exposure to the environment. Segregate universal waste by type and in distinct areas. PCB ballasts MUST be segregated from others.

- *Universal Waste Storage Shed:* This blue cargo container is specific for Universal Waste storage and is located behind 201 Carter Dr. The area is under surveillance and has limited accessibility. Contact EHS for access.
- *Hazardous Waste Storage Building:* Mercury is to be stored in a separate location from all other universal waste. Contact EHS to schedule a mercury waste pickup or to access this building.

### Labeling

Labeling of all Universal Waste is required immediately when stored. Use proper labeling and markings. Labels must include the following:

- Universal Waste Type
- Accumulation State Date
- Department
- Initials

Labels must be placed on each waste item or the container holding multiple of the same items. Labels are available from EHS. [See Appendix B: Universal Waste Label.](#)

### Inventory

A detailed inventory of all universal waste placed into storage should be maintained and accurate. See [Appendix A: Universal Waste Inventory.](#)

### Waste Pickup

Contact EHS to schedule a waste pickup or to request access to the Universal Waste Storage Shed.

## Personal Protective Equipment (PPE)

- Skin and eye contact must be prevented.
- At a minimum, gloves, safety glasses with side shields, long pants, and closed-toe shoes will be worn when handling universal waste. This is to be considered as minimum protection and must be upgraded if necessary.
- Additional PPE such as chemical goggles, face shields, chemical aprons, disposable coveralls, chemically resistant gloves, and respiratory protection must be worn if there is a greater chance of chemical exposure. EHS may be contacted for assistance in selecting appropriate PPE.
- When removing leaking ballasts use appropriate PPE (chemical-resistant gloves, Tyvek suit, and eye and face protection) Avoid skin contact with PCB oils and contact EHS for assistance in proper PPE selection.

## Battery Recycling

While Alkaline Batteries are not defined as universal waste, recycling is recommended as a green best practice. Departments may request a recycling bin for Alkaline batterie collection thought EHS. See [Battery Disposal Procedures](#) for more information.

## Ballasts

PCB and non-PCB containing ballasts are considered regulated waste and MUST be disposed of by EHS.

### *Containers:*

- Segregate PCB ballasts from non-PCB ballasts.
- Place intact non-leaking ballasts into pre-labeled steel drums provided by EHS.
  - Note: PCB ballasts should be placed into the drums labeled “Caution Contains PCBs (Polychlorinated Biphenyls)”. Non-PCB ballasts should be placed into the drums labeled “Non-PCB Ballasts”.
- Keep each drum closed unless ballasts are being added.
- Store PCB and non-PCB ballast drums in the Universal Waste Storage Shed.
- Fill each PCB and non-PCB ballast drum to 3/4 full.
- Contact EHS for a replacement drum and/or to schedule a waste pickup.

### *Other Important Notes:*

- Storage and work areas should be inspected to ensure no drums are left uncovered or any ballasts are left lying on the ground.
- Any PCB ballasts that have broken apart and/or are leaking a chemical substance should be wrapped in plastic and placed into their own leak-proof container. Label each container of broken and/or leaking PCB ballasts with the words “Non-RCRA Regulated Waste” and “Leaking PCB Lamp Ballasts.” Notify EHS immediately.
- EHS must be notified immediately in the event of a spill or accident involving PCB or non-PCB ballasts.
- If any regulatory agency should come on site (OSHA, CTDEP, EPA) contact EHS immediately.
  - DO NOT deny the representative access to the site, but request that the inspectors await the arrival of an EHS representative.

*Reviewed: February, 2024*



## **UNIVERSAL WASTE**

Federal Law Prohibits Improper Disposal

The following Materials are regulated as a Universal Waste in accordance with 40 CFR Part 273.

- UNIVERSAL WASTE - BATTERIES**
- UNIVERSAL WASTE - MERCURY CONTAINING EQUIPMENT**
- UNIVERSAL WASTE - PESTICIDES**
- UNIVERSAL WASTE - LAMPS**

Accumulation Start Date: \_\_\_\_\_

Department: \_\_\_\_\_

Initials: \_\_\_\_\_