



# University of New Haven

## POLICIES AND PROCEDURES

**Policy Title:**

### Universal Waste Management Policy

*Policy No.:* 8215

*Effective Date:* May 2011

*Last Revision:* **January 2025**

**Responsible Office:** Department of Public Safety

**Responsible Official:** Associate VP of Public Safety & Administrative Services

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## **1. Policy Statement**

The University of New Haven collects and disposes of Universal Waste in accordance with United States Environmental Protection Agency (EPA) and the Connecticut Department of Energy and Environmental Protection (CT DEEP) 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 and Administrative Services 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. Roles and Responsibilities**

### **2.1. Associate Vice President of Public Safety and Administrative Services**

- Provide administrative support for this program.
- Review and revise the universal waste management policy as needed for compliance with applicable regulations.
- Receive and file all shipping documents for universal waste disposed of off-site.

### **2.2. Associate Vice President of Facilities**

- Ensure that all contractors and facility department staff are following federal and state universal waste regulations as well as University policies and procedures.

### **2.3. Director of Facilities**

- Ensure that all universal wastes outlined in this policy are collected and stored per applicable local, state and federal regulations.

- Ensure universal waste collection area in the Winchester basement is kept neat, orderly and in compliance with local, state and federal regulations.

#### 2.4. Information Technology Manager

- Ensure that all work completed by information technology staff adheres to this policy.

#### 2.5. Employees

- Comply with all local, state and federal regulations and University of New Haven universal waste policies.
- Attend required training annually.

### 3. Universal Waste Rule

The Universal Waste Rule, defined under the EPA’s Resource Conservation and Recovery Act, 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.

#### 3.1. What is regulated under the Universal Waste Rule?

Note that aerosol cans are not regulated as Universal Waste in the State of Connecticut.

<b>Used electronics</b>	Anything with a circuit board or CRT (e.g. computers, monitors, televisions, keyboards, printers). Many contain lead, mercury, cadmium, silver, and many other hazardous components.
<b>Fluorescent lamps, bulbs</b>	Also called CFL lights (compact fluorescent bulbs), includes U-tubes. These lamps contain hazardous components like mercury vapor and sodium vapor. Broken bulbs may not be managed as universal waste.
<b>Mercury-containing devices</b>	Examples include thermostats, barometers, thermometers, switches, dental amalgam, blood pressure cuffs, etc.
<b>Unused pesticides</b>	Unused pesticides that have expired or have been recalled, banned, damaged, or otherwise will not be used, and are not regulated as a hazardous waste by the EPA. Consult the product’s safety data sheet. (The University does not produce this waste stream.)

<b>Batteries</b>	Examples include lead-acid, nickel-cadmium (Ni-Cd), lithium-ion (Li-ion), mercury, nickel-metal hydride (Ni-MH), and silver oxide. Alkaline batteries are not managed under the Universal Waste Rule, but should still be recycled.
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## 4. Collection of Universal Wastes

Universal waste at the University of New Haven is collected and managed by the Facilities Department and in some cases the Information Technology (computers and monitors) Department. Spent fluorescent bulbs and batteries to be disposed of as universal waste are collected in the basement of Winchester Hall. The University of New Haven has taken steps to ensure compliance with all applicable local, state and federal Universal Waste regulations. Items to be disposed of as universal waste will be recycled using a University-approved contractor.

### 4.1. Storage

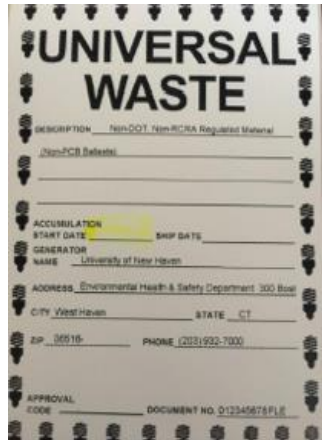
- All universal waste must be stored in the Universal Waste collection area at the University located in the basement of Winchester Hall.
- Non-broken bulbs should be placed within a cardboard box in a manner that will not promote breakage.
  - Broken fluorescent bulbs and lamps are collected as hazardous waste in a separate container labeled “Hazardous waste: Broken fluorescent bulbs” and the accumulation start date. These containers must be kept sealed unless actively adding to them and must be removed from campus for disposal through a University of New Haven-approved vendor before the 180-day date from its accumulation start date.
- Batteries should be stored in a sealable plastic container, such as a plastic bucket, due to the potential for leakage.
  - Any leaking batteries should be handled as hazardous waste, not universal waste.
- Batteries must be stored in separate containers according to their type. For example, one bucket containing lead-acid batteries may not also contain lithium-ion batteries. These must be separated.
- All containers must be kept closed at all times unless actively accumulating.
- All containers must be labeled at all times and include the accumulation start date (see section 5.0).
- Battery terminals must be taped or otherwise covered (e.g. with duct tape or the manufacturer’s plastic covering).

## 5. 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. A sample waste label is pictured below. The CT DEEP and US EPA require that all labels have the following information:

- The words “Universal Waste”;
- The type of waste (e.g. “lead-acid batteries”, “electronics”, or “nickel-cadmium batteries”) written in full (i.e. write “lithium-ion batteries” rather than “li-ion batteries”); and
- The accumulation start date (including the day, month, and year), which is the date the waste was added to the container.



## 6. 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 waste, 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 onsite at the University.

## 7. Campus Spill Reporting and Notification

In the event of a universal waste spill or leak, the party noticing the spill should immediately notify University of New Haven Police at 203.932.7070. 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;
- Ensure 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 spilled universal waste must be collected, labeled and managed as hazardous waste.

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

## **9. Administrative Duties**

A copy of the University of New Haven Universal Waste Management Policy as well as Universal Waste Bill of Ladings may be found in the Associate Vice President of Public Safety and Administrative Services office. This policy may also be found on MyCharger.

## **10. 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 and Administrative Services office upon request.