



# UNIVERSAL WASTE MANAGEMENT POLICY

**Prepared By:  
Triumvirate Environmental**

**Developed: November 2016**

**Program Approval**

\_\_\_\_\_  
Superintendent of Physical Plant

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Date

\_\_\_\_\_  
Environmental Health and Safety Coordinator

\_\_\_\_\_  
Date



# UNIVERSAL WASTE MANAGEMENT POLICY

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## 1.0 Policy Statement

Flagler College collects and disposes of Universal Waste in accordance with United States Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FL DEP) regulations.

### 1.1 Purpose and Scope

This plan provides a written description of the Universal Waste management procedures and disposal methods at Flagler College. The college encourages any suggestions from faculty for improving this plan for Universal Waste management, as the college is committed to developing and maintaining an effective protocol.

### 1.2 Review

The Superintendent of Physical Plant in coordination with the Environmental, Health, and Safety Coordinator will review and update this policy whenever necessary or at least annually.

All the elements of this policy are considered Flagler College policy and may be enforced as such. Failure on the part of the faculty/staff to follow the policies and safety requirements of this Plan may result in disciplinary action.

## 2.0 Universal Waste Rule

The EPA's regulatory standards in 40 CFR 273 "Standards for Universal Waste Management", and as adopted by the Florida Administrative Code 62-730.185 "Standards for Universal Waste Management", 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?

- **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.
- **Thermostats and devices (intact)** - Containing mercury.
- **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.
- **Pharmaceuticals** - "non-viable" pharmaceutical waste

### 3.0 Collection of Universal Wastes

Universal wastes at Flagler College are collected and managed by the facilities maintenance group.

Spent fluorescent bulbs are stored within the “Old Paint Shop” which is in the maintenance compound, next to the Gray generator. Batteries to be disposed of as universal waste are also kept within this same location. If containers are filled or space is running low, Universal waste is also stored in the Main Accumulation Area (MAA) behind the business services office, known as the “EPA Shed”, where containers are stored on pallets in the designated area.

Flagler College has taken steps to assure compliance with all applicable local, state and federal Universal Waste regulations. The following Universal Wastes are managed as such:

- Spent fluorescent lamps and bulbs are stored within the Universal Waste collection area in the Universal Waste Storage area in the maintenance compound and also in the Main Accumulation Area. Spent fluorescent lamps and bulbs are managed as follows:
  - All spent bulbs are stored in a Universal Waste collection area at the college;
  - All intact used bulbs are placed within a card board box;
  - Spent bulbs are stored in a manner as to not promote breakage;
  - 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 one (1) year before the college’s waste vendor removes these boxes from site.
  - Each box containing spent fluorescent lamps and bulbs is labeled with a minimum the words “Universal Waste” and “spent fluorescent bulbs” and the date started;
  - 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 90 days before being removed by the college’s hazardous waste vendor.
- Batteries at Flagler College are collected as universal waste and collected in a way that prevents release. Batteries are stored within the 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.
- Thermostats, thermometers and devices such as manometers and switches containing mercury can be collected and managed as Universal Waste. Flagler College infrequently produces this waste stream but is expected to not produce any mercury containing devices. In the event a mercury containing device was to become waste, it would be collected in the Universal Waste area in a closed container with proper labeling as mentioned above.
- 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. Flagler College is not expected to produce this waste stream.

#### 4.0 Labeling

All universal waste at Flagler College 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:

**UNIVERSAL  
WASTE**

CONTENTS \_\_\_\_\_

\_\_\_\_\_

ACCUMULATION START DATE \_\_\_\_\_

SHIPPER \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY, STATE, ZIP \_\_\_\_\_

### **5.0 Universal Waste Accumulation Time Limit**

Universal waste may not be accumulated for more than one (1) 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 (1) year on-site at the college.

### **6.0 Campus Spill Reporting and Notification**

In the event of a Universal Waste spill the party noticing the spill should immediately notify Flagler College Campus Security at 904.819.6200. 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
- Notify the facility Emergency Coordinator and Environmental Health and Safety Coordinator or Manager.
- All spilt universal waste must be collected, labeled and managed as a hazardous waste.
  - This duty is not to be performed by Security.

### **7.0 Managing Contractor of Universal Waste**

Flagler College 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 college with all shipping papers of these wastes.

### **8.0 Administrative Duties**

A copy of the Flagler College Waste Management Plan as well as Universal Waste Bill of Ladings may be found in the EHS office.

### **9.0 Training**

Flagler College trains all affected staff on the collection and disposal of universal waste on an annual basis. All training records can be accessed by the EHS Manager upon request.

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