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Universal Hazardous Waste Management Plan

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Universal Hazardous Waste Management Plan

Universal hazardous wastes, as regulated by the Maine Department of Environmental Protection, (MDEP) include the following universally generated hazardous wastes:

- Cathode Ray Tubes (CRT)(*e.g.*, Computer Monitors, flat panel displays and TV's)
- Mercury-containing or Lead-containing lamps (*e.g.*, Fluorescent lamps and high-intensity discharge (HID) lamps)
- Mercury-containing thermostats
- Mercury-containing devices (*e.g.*, Mercury switches, relays, manometers, etc.)
- Non-leaking intact PCB containing ballasts
- Batteries that contain toxic metals (unless returned through a Department of Environmental Protection (DEP) approved Manufacturer Takeback Program). Batteries, including Nickel Cadmium, Metal Hydride, small sealed lead acid, Lithium, Mercuric Oxide, Zinc Air and Silver Oxide button batteries would be included in this category. *NOTE: Vehicle Lead Acid Batteries are Hazardous Waste unless intact and returned via the Battery Deposit System.*
- Oil-based architectural paint – limited to interior and exterior architectural coatings sold in containers of 5 gallons or less that is unused but intended for painting components of houses or other buildings.

The University of Maine recycles electronics and alkaline batteries along with their regulated universal waste. Electronic waste includes items such as lap top computers and other computer peripherals.

Training is required for all employees or contractors who handle universal waste. Training may be completed by reviewing this policy with the employee/contractor and completing the training record at the end of the document. Training may include a review of the current Maine DEP Universal Waste Handbook.

- Training records must be maintained by the employer for the longer of 30 years or employment.
- Training is required initially and when procedures or regulations change.
- Annual or periodic refresher training is recommended to keep employees informed of any changes in procedures or regulations.

Containers of Universal Waste must be managed as follows:

- Universal wastes must be packaged and handled in a manner that prevents breakage.
- Boxes of universal waste must not be stacked more than 5 feet high. This prevents crushing of items stored in boxes in the lower levels.
- Each container of universal hazardous waste **must be labeled** with the following:
 - A universal waste label
 - The accumulation start date (date waste is first placed in the container), and
 - The container full date (date the container becomes full)
- All universal waste containers must be **securely closed** unless waste is being added or removed.
- When the container becomes full (or if waste items are broken) the container must be **sealed** around all openings/seams using wide waterproof tape (NOTE: duct tape should not be used).

Universal Waste Storage Areas must be managed as follows:

- Under no circumstances should universal wastes be stored outside (not even temporarily).
- The area must be **clearly marked with a sign** reading “Universal Hazardous Waste Storage”.
- Door(s) must be **kept locked** when not in use.
- Aisle space must be maintained to view container, labels, and dates.
- A current tally of the numbers of waste items within the area must be maintained.

- A) For Large Universal Waste Generators (*e.g.*, Orono Campus, USM Portland and Gorham, Witter Farm and Darling Marine Center)
- Wastes may not be stored for more than 6 months in a storage area.
 - The area must be **inspected weekly** and the following recorded on the log:
 - Date of the inspection,
 - Name of inspector, and
 - Condition of containers and actions taken to address problems discovered
 - Number of universal waste items stored in the area
 - Keep copies of the inspection log on-site for one year. Follow your sites procedures for submitting logs to Safety Management (SM).
- B) For Remote Small Quantity (SQG) Universal Waste Generator Sites (*e.g.*, Farms other than Witter, CCAR, Hutchinson Center, Extension Offices, USM Lewiston, etc.) with fewer than 200 items on site at any time.
- The area should be inspected whenever universal waste items are added to or removed from the storage area and the following recorded in the log:
 - Date of the inspection,
 - Name of inspector, and
 - Condition of containers and actions taken to address problems discovered
 - Number of universal waste items stored in the area
 - Keep copies of the inspection log on-site for one year.

If the tally of all Universal Waste Items approaches 200 for the entire Remote Small Quantity Generator Site – contact UMS SM (581-4055) or USM Resource Recovery (780-4658) to arrange for a waste pickup.

Record Retention:

- Weekly (LQG) or Periodic (SQG) inspection logs must be kept for one (1) year from the date of shipment or receipt of universal waste.
- Training documentation must be maintained for the longer of 30 years or employment.
- Bills of lading, Certificates of Recycling, and manifests must be kept indefinitely.

Alternative CRT Containers:

The MDEP has approved alternative acceptable containers for the storage of Universal Waste CRTs (available on their website). The following is a summary of the requirements.

CRTs may be packaged in Gaylords provided that:

- CRT's packaged to prevent shifting (use cardboard if needed to minimize breakage).
- Cover, seal and label each Gaylord when full (do not fill higher than the Gaylord sides).

Unbroken and unboxed CRTs may be stored on shelves provided that:

- Shelving must be of adequate size and construction to support the load.
- Label each CRT on the shelving (Universal Waste Cathode Ray Tube)
- Shelves used to store CRTs may be no higher than five feet off the floor.

Unbroken and unboxed CRTs may be placed on pallets for shipping following DEP Guidance.

Console TVs may be stored and shipped on pallets.

Any of these methods may be used provided UWaste Personnel Training includes a review of the most current DEP Alternate Acceptable Container Guidance and the guidance is strictly followed.

Incidental Breakage:

- Contact UMS SM at (581-4055) or USM Resource Recovery (780-4658) for assistance. Do not attempt to clean up a spill unless you've been trained.
- Broken CRTs must be individually boxed using heavy cardboard boxes with a sealed plastic liner.

To arrange for pickup of universal hazardous waste call:

Contact UMS SM at (581-4055) or USM Resource Recovery (780-4658)

The following Documentation should be also used for Universal Waste Areas:

- Universal Waste Storage Area Inspection Log
- Universal Waste Storage Area Inspection Log – Remote Small Quantity Generator Sites
- Universal Waste Annual Self-Inspection Checklist

Example Labels:

Universal Waste Lamps
(Caution Contains Mercury)

Accumulation Start Date: _____

Container Full Date: _____

Universal Waste Lamps
(Caution Contains Mercury)

Accumulation Start Date: _____

Container Full Date: _____

Universal Waste Lamps
(Caution Contains Mercury)

Accumulation Start Date: _____

Container Full Date: _____

Universal Waste Lamps
(Caution Contains Mercury)

Accumulation Start Date: _____

Container Full Date: _____

Universal Waste Lamps
(Caution Contains Mercury)

Accumulation Start Date: _____

Container Full Date: _____

Universal Waste Lamps
(Caution Contains Mercury)

Accumulation Start Date: _____

Container Full Date: _____

Universal Waste Lamps
(Caution Contains Mercury)

Accumulation Start Date: _____

Container Full Date: _____

Universal Waste Lamps
(Caution Contains Mercury)

Accumulation Start Date: _____

Container Full Date: _____

Universal Waste Lamps

Accumulation Start Date: _____

Container Full Date: _____

Universal Waste Lamps

Accumulation Start Date: _____

Container Full Date: _____

**Universal Waste
Cathode Ray Tube**

Accumulation Start Date: _____

Container Full Date: _____

**Universal Waste
Cathode Ray Tubes**

Accumulation Start Date: _____

Container Full Date: _____

**Universal Waste
PCB Ballasts**

Accumulation Start Date: _____

Container Full Date: _____

**Universal Waste
Mercury Devices**

Accumulation Start Date: _____

Container Full Date: _____

**Universal Waste
Mercury Thermostats**

Accumulation Start Date: _____

Container Full Date: _____

**Universal Waste
Motor Vehicle Switches**

Accumulation Start Date: _____

Container Full Date: _____

**Universal Waste
Oil Based Paint**

Accumulation Start Date: _____

Container Full Date: _____

**Universal Waste
Oil Based Paint**

Accumulation Start Date: _____

Container Full Date: _____

Universal Hazardous Waste

Storage Area

Authorized Personnel Only

(Keep area locked when waste is present)