

APPLICATION

NYU Langone

PURPOSE

To protect human health and the environment through the proper management and disposal of universal waste.

To comply with the requirements of 40 CFR Part 273 (Standards for Universal Waste Management) for a Small Quantity Handler of Universal Wastes.

Note: This Safety Policy supplements Safety Policy 108: *Chemical Waste Minimization and Disposal Program*.

POLICY AND GENERAL INFORMATION

1.0 Application

NYU Langone includes NYU Langone Health System (the System), NYU Hospitals Center (including the NYU Lutheran and HJD campuses), NYU School of Medicine, NYU Lutheran Family Health Centers, and all entities that are controlled by the System.

This policy applies to:

- All indoor and outdoor areas of all NYU Langone owned and leased facilities.
- All employees, contractors and consultants of NYU Langone

2.0 Policy

Waste that meets the criteria for universal waste shall be recycled as such.

3.0 Definitions

Small Quantity Handler of Universal Wastes (SQHUW) is any person, business or entity who does not accumulate more than 5,000 kilograms (11,000 lbs.) of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time. SQHUWs must dispose of universal waste at the end of a 1 year accumulation period.

Universal waste is hazardous waste that is managed under less restrictive requirements because it is recycled. If items are broken, leaking or not recycled, they must be managed as hazardous waste (see Safety Policy 108: *Chemical Waste Minimization and Disposal Program*).

Universal waste includes batteries, pesticides, mercury-containing equipment and lamps as described below.

Universal waste batteries contain hazardous components such as heavy metals or hazardous characteristic chemicals as per 40 CFR 262.24 and are not leaking (leaking batteries must be managed as hazardous waste). They may be primary (non-rechargeable), secondary (rechargeable) batteries, or used consumer products containing rechargeable batteries that are not easily removed.

The following are the most common batteries that are managed as universal waste.

Type	Common uses	Hazardous component
<i>Non-rechargeable</i>		
Lithium	Computers, cameras	Lithium
Magnesium	Flashlights, cameras, audio devices	Magnesium
Mercuric oxide	Medical equipment	Mercury
Silver oxide (button)	Calculators, watches, cameras	Silver
Zinc-air (button)	Hearing aids, pagers, cameras	Mercury
<i>Rechargeable</i>		
Small sealed lead acid	Tools, camcorders, small generators	Lead
Large sealed lead acid	Large generators	Lead
Nickel-cadmium (NiCd)	Smoke alarms, tools, small generators	Cadmium

Note: Under normal conditions, alkaline and carbon zinc batteries are not universal waste since these do not contain hazardous components. See Section 5.0 for procedures for disposing of alkaline and carbon zinc batteries.

Universal waste pesticides include:

- Stocks of unused suspended or canceled pesticides that are subject to a voluntary or mandatory recall
- Stocks of other unused pesticide products that are collected and managed as pesticide waste

Universal waste containing mercury includes unbroken:

- Mercury switches
- Mercury-containing thermostats
- Mercury-containing thermometers, barometers, sphygmomanometers (blood pressure machines), and other meters or gauges

Universal waste lamps include unbroken:

- Fluorescent light tubes
- High-intensity discharge (HID) lamps
- Neon lamps
- Ultra-violet lamps

4.0 **Responsibilities**

4.1 **Environmental Health and Safety (EH&S)** is responsible for:

- developing and managing the Program
- developing training materials and providing employee training
- periodically evaluating the effectiveness of the Program
- arranging for proper disposal of universal waste
- maintaining the universal waste records

4.2 **Departmental heads** or their designee(s) are responsible for compliance with the Program within their departments. Their responsibilities include, but are not limited to:

- ensuring that universal waste disposal containers meet the requirements described in Section 5.0 of this policy, including proper labeling of contents and accumulation start date
- ensuring proper collection of universal waste within their department(s)

4.3 **Facilities Operations, HJD Facilities Engineering, Lutheran Facilities, and Real Estate Tenant Coordinators (TCs)** are responsible for managing universal waste lamps from their facilities, including:

- Collecting, storing, labeling, and dating of universal waste lamps properly until they are picked up

- notifying EH&S for pickup and when additional containers are needed

HJD Facilities Engineering is also responsible for:

- arranging for proper disposal of universal waste lamps
- maintaining records for disposal of universal waste lamps

- 4.4 **Building Services** and **HJD Environmental Services** are responsible for collecting alkaline and carbon zinc batteries from patient care areas they service where large quantities of batteries are used.

HJD Environmental Services is also responsible for:

- collecting all universal waste at HJD except universal waste lamps
- maintaining records for disposal of universal waste that they collect

- 4.5 **Clinical Engineering** is responsible for universal waste batteries, including:

- collecting universal waste batteries from medical equipment and sorting, storing, labeling, and dating them properly until they are picked up
- contacting EH&S for pick-up or when additional containers are needed

5.0 **Procedures**

- 5.1 Properly label all universal waste, with a description of the waste contents on the label (e.g., Universal Waste – Used Ni-Cad batteries). For a sample label, see Appendix A.
- 5.2 Date waste or waste containers with the accumulation start date (the date the first item is placed in the container).
- 5.3 Do not use universal waste containers to accumulate universal waste for more than 1 year.
- 5.4 Collect and store all fluorescent lamps in rigid containers with tight fitting lids. Label each container “Universal Waste – Used Lamps” with the accumulation start date (the date that the first lamp was placed in the container).
- 5.5 Ensure containers for universal waste:
- remain closed with tight fitting lids, except when waste is being added to the container

- do not contain mixed types of universal waste (batteries shall be separated by type)
 - are structurally sound
 - are compatible with the waste contents
 - do not show evidence of leakage or spillage
- 5.6 Protect battery terminals before placing in containers. Tape terminals or place batteries in individual baggies.
- 5.7 Discard any universal waste that shows evidence of leakage, spillage, or damage as hazardous waste (see Safety Policy 108: *Chemical Waste Minimization and Disposal Program*).
- 5.8 Contact Facilities, HJD Facilities Engineering, or Real Estate TC for in-house pickup and collection of universal waste lamps.
- 5.9 Contact EH&S or HJD Environmental Services, for off-site disposal of full universal waste containers or universal waste containers with a collection start date approaching one (1) year.
- 5.10 Do not send universal waste to a destination facility unless the facility has been approved by EH&S.
- 5.11 Alkaline and carbon zinc batteries
- In locations where very few batteries are used, discard used batteries in the regular trash, since they are not universal waste.
 - In locations where large volumes of batteries are used, place tape on the battery terminals or place in individual baggies and deposit in a collection container. Contact Building Services (main campus) or HJD Environmental Services for disposal.
- 5.12 Do NOT discard electronic equipment in the regular trash. See Policy 107: *Disposal of Computers and Electronic Equipment*.

6.0 Related Safety Policies

Safety Policy 107: Disposal of Computers and Electronic Equipment

Safety Policy 108: Chemical Waste Minimization and Disposal Program

Appendix A	Universal Waste Label
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Issue date	03/2017
Replaces	01/2014
Reviewed by	P. Aguilar, Building Services E. Cintron, Real Estate R. Cohen, Facilities Operations N. Ejaz, Lutheran Safety Officer T. Harper, HJD Environmental Services J. Kang, Environmental Health and Safety R. Kishun, Clinical Engineering D. Rubbo, HJD Facilities Engineering HJD Environment of Care (EOC) Committee Lutheran EOC Committee Lutheran Family Health Center EOC Committee NYUHC EOC Committee

Summary of Revisions

Revision date	Section	Changes
February 2017	Application	Changes NYULMC to NYU Langone
	1.0	Defines NYU Langone
	3.0	Clarifies universal waste batteries
		Adds responsibilities for Lutheran Facilities
		Adds responsibilities for Real Estate
	5.0	Clarifies procedures for universal waste collection
	Review by	Adds review by Real Estate, HJD, Lutheran, and LFHC Environment of Care Committees

Universal Waste Label

**universal
waste**

contents _____

accumulation start date _____

shipper _____

address _____

city, state, zip _____

LABEL MADE IN REDMOND, OREGON, U.S.A. THE DE LEONE CORPORATION HML 844