Development Authority of the North Country Governance Policies

Subject: Universal Waste Management
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UNIVERSAL WASTE MANAGEMENT PLAN

Table of Contents

SECTION 1.0 PURPOSE

The purpose of this document is to present procedures to be followed in complying with 6 NYCRR Part 374-3 Standards for Universal Wastes. This document standardizes the items necessary to document compliance with this regulation and is intended to provide consistent procedures for defining and handling Universal Waste at all Development Authority of the North Country (Authority) facilities.

SECTION 2.0 DEFINITIONS

2.1 Universal Wastes

Universal Waste (UW) is a general descriptive term used to describe wastes that are generated by a large, diverse population. Businesses as well as unregulated households generate Universal Waste. This term is intended to be broad so that a wider range of wastes may be managed under the reduced requirements of the Universal Waste Regulations (UWR). The UWR is intended to promote recycling as well as the proper disposal of wastes.

Universal Wastes consist of:

1. **Pesticides** that have been recalled or banned from use

2. **Rechargeable Batteries** containing hazardous materials such as nickel-cadmium, lead–acid, lithium and mercury

3. **Lamps** that contain mercury and sometimes lead such as fluorescent, metal halide, HID and neon

4. **Thermostats and other equipment** that contain mercury such as switches

2.2 Pesticides

Universal Waste pesticides are recalled pesticides that are suspended or cancelled under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Other waste pesticides are not Universal Wastes. Non-universal Waste pesticide wastes are managed under hazardous waste regulations if they are listed or exhibit a listed characteristic. The Authority has a Pesticide Use Policy that excludes the use of registered pesticides. Before any pesticides are considered waste the Engineering and Environmental Division shall be consulted to determine the proper disposal method.

2.3 Batteries

The Universal Waste definition of a *battery under 40 CFR Part 273* means a device consisting of one or more electrically connected electrochemical cells which are designed to receive, store, and deliver electric energy. An electrochemical cell is a system consisting of an anode, cathode, and an electrolyte, plus such connections (electrical and mechanical) as may be needed to allow the cell to deliver or receive electrical energy. The term battery also includes an intact, unbroken battery from which the electrolyte has been removed. Batteries exempt from these regulations include batteries that are not a RCRA hazardous waste. Single use batteries fall in to this category. Single use batteries shall be recycled in accordance with the Authority's Recycling Guidance and Procedure Policy. County-owned transfer stations in

Jefferson, Lewis and St. Lawrence Counties accept single use batteries for recycling.

Batteries covered under the NYS Rechargeable Battery Recycling Act are prohibited from being disposed of in a landfill and should be handled in accordance with this Universal Waste Management Plan. The types of rechargeable batteries covered under this law include; nickel-cadmium, sealed lead, lithium ion, nickel metal hydride and any other such dry cell battery capable of being recharged. Additionally, battery packs containing any of the aforementioned batteries are included in this law. County-owned transfer stations in Jefferson, Lewis and St. Lawrence Counties and retail outlets that sell rechargeable batteries accept rechargeable battery recycling.

2.4 Lamps

Lamps are defined as the bulb or tube portion of an electric lighting device. A lamp is specifically designed to produce radiant energy, most often in the ultraviolet, visible, and infra-red regions of the electromagnetic spectrum. Examples of common Universal Waste electric lamps include, but are not limited to, fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps.

2.5 Thermostats

Thermostat means a temperature control device that contains metallic mercury in an ampule attached to a bimetal sensing element, and mercury-containing ampules that have been removed from these temperature control devices.

2.6 Small Quantity Handler of Universal Waste (SQHUW)

A small quantity handler of Universal Wastes must not accumulate more than 11,000 pounds of Universal Wastes at their facility at any time. A SQHUW may receive Universal Waste from other handlers. Small quantity handlers do not have to register or notify the USEPA or NYSDEC regarding Universal Waste activity. The Authority is considered a small quantity handler.

2.7 Large Quantity Handler of Universal Waste (LQHUW)

A universal waste handler is one who accumulates 11,000 pounds or more total of universal waste (batteries, pesticides, thermostats, or lamps, calculated collectively) at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which 11,000 pounds or more total of universal waste is accumulated. It is not expected that the Authority will generate enough UW to be considered an LQHUW handler.

2.8 Transporter

This handler engages in the off-site transfer of UW by air, rail, highway or water. This handler may transport UW from one UW handler to another, or to destination facilities.

2.9 Destination facility

This handler may treat, dispose of, or recycle UW. The owner of a destination facility receives UWs from transporters, SQHUW, and LQHUW.

SECTION 3.0 RESPONSIBILITIES

Authority personnel that handle or generate Universal Wastes are required to follow specific requirements to comply with federal and state regulations. These requirements address handling, storage, labeling, and disposal.

3.1 Engineering and Environmental Responsibilities

1. Develop and revise, as necessary, the Authority's Management Plan

2. Research recycling and disposal options and recommend appropriate vendors for proper disposal

3. Review current regulatory requirements concerning Universal Waste and communicate changes to affected employees

4. Train staff that handle or generate Universal Wastes, and document training

5. Perform regular audits of Universal Waste Management requirements to ensure compliance

3.2 General Managers Responsibilities

The General or Division Manager that is in charge of each Authority facility will act as the Universal Waste Incident Response Team Coordinator and be responsible for the following:

1. Maintain required documents for Universal Waste generation and shipment

2. Perform periodic inspections of areas where Universal Wastes are stored to ensure that they have been properly identified, labeled, and stored for collection and disposal

3. Arrange for Universal Waste pickups

3.3 Universal Waste Generators

Authority employees who manage or generate Universal Wastes must:

1. Understand what constitutes a Universal Waste

2. Follow the policies and procedures set forth in this plan.

3. Coordinate with appropriate personnel to ensure these wastes are handled in a safe and environmentally sound manner

4. Read and understand the Universal Waste Management Plan

5. Conduct work to minimize the generation of Universal Waste

6. Be familiar with the properties, health risks, and precautions required for handling Universal Waste that they come in contact with

7. Be familiar with the Safety Data Sheet (SDS) for any Universal Wastes that they come in contact with

8. Select and use appropriate personal protective equipment required to safely work with Universal wastes

9. Contact Engineering and Environmental with any questions regarding Universal Waste handling or disposal

SECTION 4.0 UNIVERSAL WASTE MANAGEMENT HANDLING & DISPOSAL REQUIREMENTS

The success of the Universal Waste Management program is related to the training that employees generating Universal Wastes receive regarding their responsibilities for proper handling and disposal. Universal Wastes must be properly packaged, labeled, and then stored at the on-site storage area. If in doubt with any aspect of the waste identification, contact Engineering.

4.1 Universal Waste Management Requirements

There are a few general requirements for the management of Universal Wastes:

1. Universal Wastes must not be disposed of at the facility where they are generated.

2. Universal Wastes must not be treated or diluted.

3. Releases of Universal Wastes to the environment must be prevented.

4. A secure storage area should be chosen that minimizes the potential for tampering or damage to the containers and that affords easy access and cleanup in the event of an incident. This area must be designated with a sign identifying it as the “Universal Waste Storage Area.”

4.2 Universal Waste Labeling

The Universal Waste or the container of Universal Waste must be labeled or clearly marked with the words:

Universal Waste – [batteries] [lamps] [thermostats] [pesticides] (as applicable)

Also, the date that the Universal Waste was generated or the date that the first Universal Waste was placed in a container should be included on the label.

4.3 Universal Waste Accumulation Time Limit

Universal Waste may not be accumulated for more than one year from the date that the waste is generated or received from another handler. The regulations require that the handler be able to demonstrate the length of time the Universal Waste has been accumulated. Personnel responsible for the generation and handling of Universal Wastes must label each Universal Waste, or each container of Universal Waste with the date that the Universal Waste was placed in the container. Universal Waste or containers of Universal Waste shall be managed such that the Universal Waste is not accumulated for more than one year.

4.4 Universal Waste Transportation

The Authority is considered a “small quantity handler” of Universal Waste and is prohibited from sending Universal Wastes or taking it to a place other than another Universal Waste

handler or destination facility. The Authority may transport Universal Wastes without a Part 364 hazardous waste transporter permit if less than 500 pounds of Universal Waste is on the same vehicle. The regulation allows for the Authority to transport Universal Waste to a central collection point as long as there is less than 500 pounds of Universal Waste in the vehicle.

4.5 Batteries

Universal Waste batteries must be managed in a way that prevents releases to the environment, as follows:

A small quantity handler of Universal Waste must contain any Universal Waste battery that shows evidence of leakage, spillage, or damage that could cause leakage in a container. The container must be closed, structurally sound, compatible with the contents of the battery.

The following activities may be conducted as long as the casing of each individual battery cell is not breached and remains intact and closed.

1. Sorting batteries by type;

2. Mixing battery types in one container;

3. Discharging batteries so as to remove the electric charge;

4. Regenerating used batteries;

5. Disassembling batteries or battery packs into individual batteries or cells;

6. Removing batteries from consumer products

Containers of Universal Waste batteries must be marked with the words:

1. Universal Waste – Batteries **and**

2. The date the batteries were first placed in the container.

4.6 Pesticides

Universal Waste pesticides must be managed in a way to prevent releases to the environment. The Universal Waste pesticides must be contained in one or more of the following:

1. A container that remains closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions; or

2. A container that does not meet the requirements above must be over packed in a container that does meet the requirements.

Universal Waste pesticide containers must be labeled with the words

1. Universal Waste – Pesticides; **and**

2. The date the waste pesticide was initially generated.

4.7 Thermostats and other mercury-containing equipment

Universal Waste thermostats must be managed in a way that prevents releases of any Universal Waste or component of a Universal Waste to the environment, as follows:

Any Universal Waste thermostat that shows evidence of leakage, spillage, or damage must be placed in a container. The container must be closed, structurally sound, compatible with the contents of the thermostat, and must lack evidence of leakage, spillage, or damage that could cause leakage.

Containers must be labeled with the words

1. Universal Waste – Thermostat; **and**

2. The date of the first thermostat was placed in the container.

4.8 Lamps

Universal Waste lamps must be managed in a way that prevents releases of any Universal Waste or hazardous waste to the environment, as follows:

1. Lamps must be placed in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. The original packaging, if sound, meets these requirements. Such containers and packages must remain closed and must lack evidence of damage that could cause leakage.

2. Any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury must be immediately cleaned up and placed in a container. Containers must be kept closed, be structurally sound, be compatible with the contents of the lamps and must lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury.

The lamp container must be labeled or clearly marked with the words:

1. Universal Waste – Lamps; **and**

2. The date that the first lamp was placed in the container.

4.9 Incident Control

In the event of a Universal Waste incident, the person discovering the release must immediately initiate the following actions:

1. Contact General Manager of the facility

2. If possible, open windows and doors to ventilate the area during cleanup; otherwise, seal off the area as well as possible;

3. **DO NOT** use a vacuum cleaner to clean up a mercury spill. A vacuum cleaner will spread the mercury vapors throughout the area, increasing the chance of exposure.

The Incident Response Team Coordinator will direct and coordinate the clean-up activities and evaluate if an environmental contractor will be required to perform the clean-up activities. The Incident Response Team Coordinator will then initiate any notification procedures.

SECTION 5.0 TRAINING

5.1 General

Authority employees who generate Universal Waste are required to have training *appropriate to their level of responsibility*. Awareness training will be provided to all employees during the new employee orientation training. Special training and an annual refresher will be provided for individuals handling Universal Waste. Training for Universal Waste management will be updated to reflect the most current regulatory requirements. Training materials are provided on the Authority computer network at: Q:\Environmental Compliance\Universal Waste Management Plan\Training and cover the following topics:

1. Identification of Universal Waste;

2. Container use, marking, labeling, and on-site transportation; and

3. Storage area requirements.

SECTION 6.0 DOCUMENTATION

To comply with Executive Order 4 (EO4) the Authority is required to track certain wastes.

6.1 Batteries

Battery quantities (in tons) will be tracked for EO4 reporting by the facilities that generate these wastes.

6.2 Pesticides

The Authority has a Pesticide Use Policy that excludes the use of registered pesticides. Before any pesticides are considered waste the Engineering and Environmental Division should be consulted to determine the proper disposal method.

6.3 Thermostats and other mercury-containing equipment

Thermostats, switches and other mercury-containing equipment quantities will be tracked (in tons) for EO4 reporting by the facilities that generate these wastes.

6.4 Lamps

Quantities will be tracked and reported (in tons) for EO4 reporting.

6.5 Disposal

The EO4 Recycling log will be used to document any shipment of Universal Waste from the facility. At a minimum the log will document the date, type, amount, hauler and destination of the Universal Waste. Records related to Universal Waste disposal will be maintained at each facility and made available for internal audits.

SECTION 7.0 INFORMATION, RESOURCES AND CONTACTS

USEPA, Universal Waste Regulations; http://www.epa.gov/osw/hazard/wastetypes/universal/
NYSDEC Hazardous Waste Regulations; http://www.dec.ny.gov/regs/4390.html
NYSDEC Standards for Universal Wastes http://www.dec.ny.gov/regs/4378.html
Listing of Lamp Recyclers; http://www.dec.ny.gov/chemical/9089.html

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