



**Dartmouth College**

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ENVIRONMENTAL HEALTH AND SAFETY

## Universal Waste Management Plan

### Introduction

Dartmouth College is committed to meeting all federal, state and local regulations in the management of universal waste. Responsibility for compliance with universal waste regulations begins with the waste generator and remains the responsibility of the College from collection to eventual disposal by a licensed vendor. Universal Waste is a category of waste that poses less of a risk to human health and the environment—*if managed properly*. Universal wastes include everyday items found in building operation and maintenance including fluorescent lamps, batteries, intact mercury containing devices, cathode ray tubes, some pesticides and antifreeze. These wastes are “universal” in the sense that they are found in any household or business. *If not managed properly*, universal waste becomes hazardous waste.

### Purpose

The purpose of this plan is to provide information and guidance for universal waste generation, storage, packing, record development/maintenance and general management of universal wastes at Dartmouth College.

### Regulatory Authority

The New Hampshire Department of Environmental Services (DES) under Env-Wm 1100 describes the regulatory requirements for universal waste.

### Universal Waste Management

"Universal wastes" are a special group of hazardous wastes that are generated by all segments of the population and, unfortunately, often improperly disposed by the people who generate them. In an effort to make it easier and more cost effective to properly manage these wastes, the "**Universal Waste Rule**" exempts the wastes from the more burdensome **Hazardous Waste Rule** requirements, as long as they are managed in a way that prevents release to the environment and properly recycled or disposed.

Wastes the N.H. Department of Environmental Services (DES) has declared to be universal wastes are:

- Batteries
- Fluorescent lamps (including HIDs)
- Cathode Ray Tubes (CRTs)
- Antifreeze (automotive)
- Mercury containing Devices (such as thermometers and thermostats)
- Pesticides (FIFRA listed, unregistered)

*Batteries and Fluorescent Lamps* - Dartmouth College manages these items as universal waste. This is done by FOM through the Director of Custodial Services who is responsible for collection, processing and disposal of these items. EHS is responsible for training and emergency response. (See *FOM Standard Operating Procedures for Universal Waste Collection*). The Main Accumulation Area is located in the McKenzie yard area and there are many Satellite Accumulation Areas throughout campus. Contact the Custodial and Recycling Services Director for current site locations. Containers are labeled as Universal Waste- Lamps or Universal Waste- Batteries and kept closed except when adding contents. When universal waste containers are full, they are transported by the FO&M Recycling and Trash crew from satellite areas to the main accumulation area. Universal Waste batteries and lamps are disposed via a fully licensed universal waste disposal company.

*Cathode Ray Tubes* - Procurement through Materials Management is responsible for collection, processing and disposal of CRTs. By NH Statute, CRTs along with microwave ovens and televisions are banned from landfill or incineration. CRTs, microwaves and televisions must be recycled. The main accumulation area is at the Hillcrest building. Functioning and repairable CRTs are refurbished via a third party. E-mail "Materials Management" for a pick up of these items.

*Antifreeze, Mercury Containing Devices and Pesticides* - EHS is responsible for collection, processing and disposal of these items. Due to the small volume of these waste streams, they are managed as hazardous waste. (See the *Hazardous Waste Management Plan*)

### **Waste Minimization**

The prudent management of hazardous materials is an institutional priority. For more than ten years, Dartmouth has aggressively sought to remove and dispose of old, unwanted and used hazardous wastes. Waste minimization is a key component of its mandatory training programs for research and support personnel. EHS provides inspection, training and audit services in support of waste minimization.

## **Training**

EHS provides comprehensive training to ensure that individuals involved in hazardous waste generation and disposal understand regulatory requirements and the methods to minimize hazards and risk associated with the management of hazardous waste. This training includes universal waste management. The training may include instruction in USEPA, NHDES, OSHA and USDOT requirements.

## **Record Keeping and Reporting**

Hazardous waste generators are required to create, provide and maintain records to track waste from generation to ultimate disposal. The EHS Hazardous Waste Manager maintains the required records and profiles for hazardous waste management at Dartmouth. (See the *Hazardous Waste Management Plan*) Minimum requirement for records retention is three years. All shipping papers for universal wastes shipments are maintained by the Hazardous Waste Manager.

## **Emergency Preparedness and Response/Contingency Plan**

Universal wastes if not managed correctly become a hazardous material or waste. Risks associated with the handling of these hazardous materials include spills, leaks and releases. This Universal Waste Plan outlines the practices procedures and policies intended to prevent spills, leaks and releases in the first place. In the event of a spill, Dartmouth College has developed and implemented an Integrated Contingency Plan (ICP) that outlines policies and procedures Dartmouth College personnel will take to minimize hazards to human health and the environment from releases of hazardous materials. It also identifies actions and designates personnel who will respond to emergencies including hazardous materials spills.

Trained and specially equipped response personnel are available 24 hours a day as required by the ICP. For detailed information on emergency response, consult the Integrated Contingency Plan located in Room 119, 37 Dewey Field Road, Hanover, NH. As required by law, EHS maintains a master list of all parties with copies of this plan and evidence of its transmittal.

April, 2015