

## **Belmont University Universal Waste Policy**

### **Purpose:**

Universal Wastes are specific categories of common Hazardous Wastes that are regulated so that management of those items is less burdensome. None of the items may be disposed of in the regular trash or down the drain. This policy is produced to ensure compliance with 40 CFR 273.

### **I. Universal Waste Categories and Processes**

- a. General Information
  - i. Universal Wastes may be accumulated on campus for no longer than one year from the date the waste is generated (the date the items are declared waste or placed in a disposal container).
  - ii. Manifests and other documentation related to recycling and disposal amounts must be uploaded to the appropriate manifest folder in Belmont University's EMIS2 system. Contact the Office of Risk Management and Compliance for a login or assistance with the program.
- b. Batteries
  - i. Batteries (not including car batteries) must be bagged and dated with supplied bags and placed in appropriately labeled battery recycling buckets located across campus. See Appendix A for locations.
  - ii. Each Waste Battery Collection Location must have a sign posted declaring the area as such. See Appendix B for sign.
  - iii. Batteries, other than single use alkaline, that are leaking must be placed in a separate container or plastic bag, labeled with a Belmont University Hazardous Waste Label obtained from the Office of Risk Management and Compliance. Wear appropriate gloves when handling leaking batteries.
  - iv. Separate different types of batteries (such as rechargeable and non-rechargeable) from each other with plastic bags or separate buckets, as appropriate.
  - v. Store larger rechargeable batteries upright and keep the electrodes away from each other and metal objects. This can be accomplished by bagging each rechargeable battery separately.
  - vi. Lid to battery buckets must be closed at all times except when inserting or removing batteries.
  - vii. The Office of Risk Management and Compliance will empty the battery buckets at least twice a year or upon notification of need and ship regulated batteries to a recycling facility.
- c. Mercury Containing Equipment (MCE)

- i. Take intact mercury containing equipment or ampules to the Lab Manager at School of Sciences for disposal.
    - ii. If MCE is not intact, follow the Mercury Spill Cleanup Guide and notify the appropriate personnel of the Mercury Spill Cleanup Kit usage.
  - d. Recalled or unused Pesticides
    - i. Unused or recalled pesticides that are obsolete must be in a container that remains closed, is structurally sound, displays an appropriate Universal Waste label as well as the original product label or information, and is compatible with the contents.
    - ii. When an unused pesticide is declared waste and labeled, notify the Office of Risk Management and Compliance for disposal arrangements.
  - e. Waste Lamps
    - i. Fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lighting lamps or bulbs are considered universal waste when intact and unbroken.
    - ii. Used bulbs will be stored in appropriately labeled, closed boxes in the Facilities Management Services Building by Facilities Management Services personnel.
    - iii. When Universal Waste bulbs are broken that are of a type that has not passed a TCLP test, follow the Mercury clean up instructions in Appendix C or follow the guidelines located online at <http://www2.epa.gov/cfl/cleaning-broken-cfl>. After cleanup, the broken bulb and material can be stored appropriately until shipped to the appropriate recycling location.
    - iv. Boxes of used bulbs will be stored no longer than one year from the date of generation. They will be sent to an appropriate recycling/disposal vendor prior to the one year date.

## **II. Labeling and Signage**

- i. See Appendix A for Waste Battery Bucket locations.
  - ii. See Appendix B for Waste Battery Location Signage.
  - iii. See Appendix C for Mercury Spill Clean-up Guide.
  - iv. See Appendix D for Hazardous Waste Label Example.
  - v. See Appendix E for Universal Waste Battery and Lamp labels.

## **III. Emergency Response and Spill Clean-up**

- i. Mercury Spill kits are required in areas that have mercury in their chemical inventories.

- ii. In the absence of specific Mercury Spill Kit instructions, see Appendix C for general Mercury spill cleanup instructions.

**Appendix A**  
**Battery Bucket Locations**

<b>Building Location</b>	<b>Bucket Location</b>
<b>Barbara Massey Hall</b>	<b>4<sup>th</sup> floor copy Room</b>
<b>Beaman SLC/Curb Event Center</b>	<b>Distribution Room Near Event Services Offices</b>
<b>Fidelity Hall</b>	<b>2<sup>nd</sup> Floor Hallway Near Breakroom 4<sup>th</sup> Floor Hallway Near Trash Bins</b>
<b>Freeman Hall</b>	<b>3<sup>rd</sup> Floor Office of Risk Management and Compliance</b>
<b>Gabhart Building</b>	<b>Campus Security Office University Ministries Career Services Office</b>
<b>Inman Health Science Building</b>	<b>107 – Workroom 132 – Lab 207 – Workroom 232 – Lab 311 – Lab</b>
<b>Janet Ayers Academic Center</b>	<b>3<sup>rd</sup> Floor Workroom (3108) 4<sup>th</sup> Floor Workroom (4041)</b>
<b>Johnson Center</b>	<b>3<sup>rd</sup> Floor Workroom/Copy Center</b>
<b>Leu Center for The Visual Arts</b>	<b>Office Workroom (19)</b>
<b>Lila D. Bunch Library</b>	<b>Staff Breakroom</b>
<b>Massey Performing Arts Center (MPAC)</b>	<b>2 Buckets in MPAC Office (19)</b>

**Appendix B**  
**Waste Battery Location Signage**

<b>Universal Waste Batteries</b>	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	

## **Appendix C**

### **Mercury Spill Clean-up Guide**

#### ***Introduction:***

Elemental mercury is a toxic metal that is liquid at room temperature. When spilled, it fragments into small beads that can roll away from the location of the spill and vaporize or become airborne relatively easily. Appropriate handling and timely spill response is critical to the well-being of the campus population.

Substitute materials should be used where possible. Mercury on campus should be stored in unbreakable containers with closed lids in a well-ventilated area. Do not store with acetylene, fulminic acid or ammonia. Those materials can result in an explosive material when mixed with mercury.

When working with mercury, the instrument or experiment should be placed in a plastic pan that is large enough to contain the mercury if spilled. Transfers of mercury between containers should be performed in a hood, over a tray or pan. Never handle mercury over sinks and wear latex or nitrile gloves while handling mercury. Clothing or porous materials that comes into contact with mercury should be discarded and never washed and reused.

#### ***Simple Mercury Spill Procedures:***

Isolate the area to prevent people from entering the spill area. Warning signs, barrier tape, locked doors, etc. may be used for this purpose. Determine if the spill is a simple spill, defined as a spill of less than 30 milliliters (two tablespoons) of mercury and accessible on a non-porous surface.

All buildings where mercury is used must have a mercury spill kit available. Spill kits usually contain:

- Sponges
- Mercury absorbing powder
- Water spray bottle
- Nitrile gloves
- Shoe covers
- Flashlight
- Dust pan
- Scoop
- Plastic bags

If a simple spill occurs, after evacuating the immediate area:

1. Remove all gold or silver jewelry.
2. Put on gloves and shoe covers.

3. Beginning at the outer perimeter of spill, dust area with mercury absorbing powder. Do NOT sweep mercury with a broom or regular vacuum cleaner, as those items will make more mercury airborne.
4. Using a damp sponge, scrub the contaminated surface, working the powder into a paste.
5. After the paste has dried, collect it with a squeegee or stiff card and place into plastic bags or container for disposal.
6. For vertical or overhead surfaces, use mercury absorbent sponges and wipe the surface slowly.
7. Use the flashlight to inspect the area and illuminate the smaller beads of mercury.
8. Re-clean the site as needed.
9. Put all items used in the cleanup into a plastic bag separate from the mercury for disposal.
10. Seal and label the bags.
11. Notify the Office of Risk Management and Compliance if your department does not have a hazardous waste disposal process.

### ***Large Mercury Spills***

Spills of two tablespoons or more must be reported immediately to Facilities Management Services at 615-460-6670 and the Office of Risk Management and Compliance at 615-460-6023, who will then notify the National Response Center (NRC) at 1-800-424-8802 and the Emergency Management Response Team.

Appendix D  
Hazardous Waste Label Example

**HAZARDOUS  
WASTE**

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

CONTENTS \_\_\_\_\_

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

**HAZARDOUS  
WASTE**

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

CONTENTS \_\_\_\_\_

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES



**Appendix E  
Universal Waste Labels**

<b>Universal Waste Batteries</b>	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	
Accumulation Start Date:	
Pick up date:	

<b>Universal Waste Lamps</b>	
Accumulation Start Date:	____ / ____ / ____