Universal Waste Instructional Manual and Quiz

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Training Requirements for Employees to be Authorized to Enter the Rooms

Please review this manual and then click on the link to the quiz at the end to document your training.

John Jay College has a designated Universal Waste Room in each building for the storage of used mercury-containing bulbs (technical name is lamps) and used batteries in compliance with the DEC: Subpart 374-3: Standards For Universal Wastes. Aerosol cans may be stored in Universal Waste Rooms that are also designated as hazardous waste Satellite Accumulation Area (SAA). Universal waste storage room locations are:

1) New Building – Rm. L2.86.1
2) North Hall – Cellar
3) Haaren Hall – Room by loading dock L151
4) BMW Building – Rm. 620
5) Westport – Rm. S125
6) 54th Street Annex – 7th floor, next to Public Safety Desk
7) Macaulay Honors College basement mechanical room
Authorized Persons

Besides from EHS, only trained John Jay personnel shall have access to the Universal Waste Rooms. Passing the quiz at the end of this module is a prerequisite to becoming authorized.

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Universal Waste Categories: Lamps and Batteries

The only items that are allowed to be stored in John Jay Universal Waste Rooms are:

1) Most of the lamps found at John Jay are fluorescent and contain mercury. The following lamps (technical name for bulbs) are disposed of as universal waste: all fluorescent lamps, Black lights, Compact fluorescent lamps (CFLs), deuterium lamps (box separately from all other lamps; label box “deuterium lamps”), Germicidal UV lamps, High-intensity discharge (HID) lamps (metal halide, ceramic metal halide, high-pressure sodium, mercury vapor), Xenon-mercury lamps, certain Neon lights and Projector lamps. If you are not sure, contact EHS by writing to safety@jjay.cuny.edu

    Mercury containing lamps will contain a label as shown below:

![Mercury Lamp Label]

Storage of Used Lamps

Contain any spent lamps in closed containers or packages that are:

a) Structurally sound,
b) Adequate to prevent breakage,
c) Compatible with the contents of the lamps.
d) On a secure surface so they are not at risk of falling

Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage (6 NYCRR 374-3.2(d)(4)(i); 40 CFR 273.13(d)(1)). If there is any evidence of spillage, leakage or damage, notify EHS.
Used Lamps Container Labeling

The container that used lamps are stored in must be clearly labeled in this format – “Universal Waste – Type of product, with the date that items were first put into the container (ACCUMULATION START DATE).” Lamps must be removed by the college’s waste vendor before one year of the accumulation start date.

Indicate the date the first lamp was placed in the container on the sticker. Extra stickers can be found with the inspection logs in each room. If the stickers run out, please contact x4117 or x4625.

Lamp Sticker

a) Acceptable Containers for Used Lamps
   - 2 ft. lamps shall not be stored in a 4 ft. lamp tube. There is a 30 gallon fiber drum specifically for storing 2 ft. lamps and U-tubes.
   - 6 and 8 ft. lamps shall not be stored in a 4 ft. lamp tube. Anything over 4 ft. shall be stored in an 8 ft. box.
   - The lamp tubes must be covered with a lid that fits over the opening perfectly. If the lid does not fit it is the wrong container.

b) Bulb storage containers (drums, pails, tubes, boxes) shall not be obstructed. The containers shall be moved easily for pickup without having to move any items that may be blocking them.

New Lamps

Storage of New Lamps

Signage Requirement – “New Lamps” signage is required in areas where new lamps will be stored. New lamps can be stored in its original containers as long as the box can be securely closed each time after lamps are removed (tape must be used to seal the lid if the box doesn’t close properly). This is a requirement to prevent any lamps from accidentally falling out and breaking. No lamps, good or used, may be stored outside of a closed, structurally sound container.
Procedure for Broken Bulbs/Cleaning up Spill Residue

The residue from cracked or broken bulbs must be cleaned up. Allow the air to clear out for 10 minutes by keeping the door open. Gloves and duct tape are available in each room. Pickup broken pieces with the duct tape and place the cleaned up items in a plastic pail with a tight-fitting lid and label “Hazardous Waste-Broken Lamps.” Do not use a vacuum.

Each Universal Waste room is equipped with the following supplies for cleaning up broken lamps. EHS will ensure these supplies are available.

- duct-tape or masking tape (to pick up small shards)
- gloves
- plastic pails with lids to contain the broken lamp waste
- paper towels
- pen or magic marker
- labels

For larger quantities of lamps broken at the same time (for example, a box of lamps falling from a hand truck) the use of respiratory protection may be necessary for protection against mercury vapor. Phone the Public Safety emergency number, x8888, from a safe location and request that Environmental Health and Safety personnel be notified. Provide a phone number where you can be reached.

2) Storage of Used Batteries

Alkaline batteries such as AAA, AA, C, D and 9-volt batteries can be disposed of in the trash. All other batteries are to be stored in separate pails, covered with lids, and labeled “Universal Waste – Batteries __________ accumulation date” The accumulation date is the date a battery first was added to the container and the container must be removed by the college’s waste vendor within 1 year. Notify x4117 or x4625 if additional containers are needed.

Ex. Of Battery Sticker

Aerosol Cans

Aerosol cans are not Universal Waste. They contain a flammable propellant and must be labeled as Hazardous Waste. A 55 gallon container for used aerosol cans may be stored in a Universal Waste Room that is also designated and posted with a Hazardous Waste Satellite Accumulation Areas (SAA) sign. Contact x4117 or x4625 if you need to have a room designated as a Hazardous Waste Satellite Accumulation Area.
A label is required for containers that hold aerosol cans. The label must say “Hazardous Waste-Aerosol Cans, Flammable. The accumulation date, the date the container becomes full, should only be filled in when the container becomes full.

**Inspection Log**

Every time an item is deposited in the Universal Waste Room, it must be accounted for and the room must be inspected to ensure that it meets regulatory requirements. Sign the Inspection Logbook each time you enter the room. Every column in the Inspection Log must be filled out completely. Inform EHS by calling x4117 or x4625 or write to safety@jjay.cuny.edu if there are any deficiencies.

**Housekeeping**

The Universal Waste Room must be kept tidy, organized and have no clutter. There are very specific storage rules for contents of the room. Any mess (broken glass pieces from fluorescent lamps, spills, leaks, or residue from waste items, etc.) that John Jay personnel makes or finds must be cleaned up immediately by that person. Keep boxes of used lamps closed, except when adding lamps to the containers.

Email safety@jjay.cuny.edu if a universal waste pick-up is needed or phone x4625.
Personal Protective Equipment

Each Universal Waste room shall have eye goggles and a box of nitrile, vinyl, or latex gloves. EHS is in charge of checking and replenishing the stock.

Non-compliance

Failure to comply with any of the requirements in this document may lead to restrictions in who can access the rooms and may lead to costly state and federal violations.

Universal Waste Quiz

In order to gain authorized entry to a Universal Waste Room, you must pass the quiz linked here: http://www.classmarker.com/online-test/start/?quiz=pdy533adae128f51
You must get 100% (10 out of 10) to pass the quiz.