



UNIVERSAL WASTE MANAGEMENT PLAN

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Reviewed and Updated

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Rhode Island College
Universal Waste Management Plan

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1.0 Purpose & Scope

Rhode Island College (RIC) collects and disposes of Universal Waste (UW) in accordance with United States Environmental Protection Agency (EPA) (29 CFR 273) and the Rhode Island Department of Environmental Management (RI DEM) regulations (RICR 250-140-10-1.14). This Universal Waste Management Plan provides a written description of the Universal Waste management procedures and disposal methods at Rhode Island College. The College encourages any suggestions from employees for improving this Plan for Universal Waste management, as the college is committed to developing and maintaining a safe, effective policy regarding UW. A copy of this Universal Waste Management Plan as well as any applicable shipment documentation may be found in the Facilities and Operations office.

1.1 Review

The Associate Director of Facilities and Operations, or their designee, will review and update this Plan whenever necessary or at least annually. All the elements of this Plan are considered Rhode Island College policy and may be enforced as such. Failure on the part of the employees to follow the policies and safety requirements of this Plan may result in disciplinary action. A copy of the Rhode Island College Waste Management Plan as well as shipment documentation may be found in the Facilities and Operations Main office or made available upon request.

2.0 Universal Waste Rule

The Universal Waste standards at both at a federal and state level provide a set of streamlined regulations to reduce the regulatory burden of managing and disposing/recycling common products containing hazardous materials. Some examples of these eased regulatory burdens are increased storage limits of certain types of wastes, reduced record-keeping requirements, and using common carriers.

Additional information regarding universal waste can be found here:

<http://www.dem.ri.gov/programs/benviron/assist/pdf/univrul.pdf>

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2.1 Universal Waste(s)

- **Batteries** – Batteries that exhibit hazardous characteristics per 29 CFR 261, or contain components such as lead, nickel, silver, lithium, mercury and other metals. Lead acid batteries are to be managed as universal or hazardous waste unless they are being reclaimed (40 CFR 266 Subpart G). Some dry cell batteries such as alkaline, zinc-carbon, and silver oxide batteries are usually non-hazardous and do not require management under hazardous or universal waste regulations, however the RI DEM encourages disposing all batteries as universal waste to divert them from solid waste landfills and incineration facilities.
- **Used Electronics** – Any device or equipment that has a circuit board or a cathode ray tube (CRT). This includes computers, monitors, televisions, CPUs, printers, radios, scanners, cameras telephones (including cellular), VCR/DVD/CD players, etc. These must be recycled or disposed of as universal or hazardous waste. Electronic equipment containing lead, mercury, cadmium, silver and many other hazardous components must be managed as universal or hazardous waste.
- **Lamps** – Any lamp that exhibits hazardous characteristics, and all mercury containing lamps. In addition to fluorescent lamps some examples are mercury vapor, neon lamps, and high intensity discharge (HID) (mercury vapor, metal halide, high pressure sodium lamps). Broken bulbs may not be managed as universal waste.
- **Mercury containing equipment/devices** – Any device or equipment that contains elemental mercury (Hg) of any amount as part of its functionality or operation. This may include thermostats, thermometers, barometers, electric switches, etc. The mercury must be contained within the devices or it must be managed as hazardous waste.
- **Pesticides** – Recalled or obsolete pesticides, or those that are unused and no longer needed.
- **Silver-containing photo fixing solutions** – Photo fixing solutions containing silver that do not meet the definitions of D011 or fail the TCLP test for silver.

3.0 Universal Waste Handler Status

Rhode Island College is a small quantity handler of universal waste, meaning the college accumulated less than 11,000 lbs (5,000 kg) and 44,000 lbs (20,000 kg) of used electronics at any time. Under these accumulation thresholds, Rhode Island College is not required to notify the EPA or RI DEM of universal waste activity or keep records of shipments. RIC does, however, aim to track this activity as much as possible, as a best management practice.

4.0 Collection & Management of Universal Waste(s)

Universal Waste(s) at RIC are collected and managed by Facilities and Operations, and in some cases Information Technology. Spent fluorescent bulbs are stored within the electrical shop located in the basement of the Physical Plant Building in addition to universal waste batteries.

Rhode Island College has taken steps to assure compliance with all applicable local, state, and federal Universal Waste regulations. The following Universal Wastes are managed as such:

- Used electronics inclusive of computers, monitors, televisions, and any other item containing a circuit board/CRT or are stored and handled within the Facilities and Operations Warehouse. These items at the college are recycled through an outside vendor.
- Spent fluorescent lamps and bulbs are stored within the Universal Waste collection area in the facility electrical office work area. Spent fluorescent lamps and bulbs are managed as follows:
 - Spent bulbs are stored in a manner as to not promote breakage;
 - Each box containing spent fluorescent lamps and bulbs is labeled with the words universal waste and “spent fluorescent bulbs” per the labeling requirements outlined in Section 4.0 of this Plan;
 - All spent bulb boxes, drums, etc. are kept closed unless bulbs are being actively added to the container; and
 - A start accumulation date is placed on each bulb box as the first spent bulb is added. The container is then kept on-site for up to a year before the college’s waste vendor removes these boxes from site.
- Any mercury containing devices designated as waste would be collected appropriately in a universal waste collection area in a properly labeled, closed container.
- Batteries are collected as universal waste and collected in a way that prevents release. Batteries are sorted by type and segregated in a manner as to not have different battery types in the same container.
 - Batteries must be labeled per **Section 5.0** of this Plan.
 - Terminals of the batteries are taped to avoid a fire or other reaction.
 - Universal wastes will not be intentionally crushed, broken, etc.
- Damaged batteries, lamps, mercury containing devices, and other UW categories will be collected as hazardous waste and meet all applicable storage, labeling, and handling regulations and requirements.

5.0 Labeling

All Universal Waste at Rhode Island College must be labeled with a universal waste label, either on the individual item or an outer container or drum. The label must be filled out to include a description of the waste and be labeled with the date the item became a waste. The label must also clearly identify the waste as a universal waste with the words "Universal Waste," followed by words to specify the type of universal waste (i.e. Lead Acid Batteries, Mercury-containing Fluorescent Light Bulbs). Additionally, all containers or items labeled as Universal Waste must have the initial accumulation start date included. For containers or drums containing universal waste, this would be the earliest date anything was placed in the container. These wastes may remain onsite for up to one year from this start date, and these dates are determined by when the material is designated as waste.

5.1 Universal Waste Accumulation Time Limit

Universal waste may not be accumulated for more than one year from the date that it became waste. Personnel responsible for the generation and handling of universal wastes must label each universal waste, or alternatively, each container of universal waste with the date that the universal waste was placed in the container. Universal waste or universal waste containers shall be managed so that it is not accumulated for more than one year on-site at the college.

6.0 Disposal

All universal waste being shipped off-site for disposal must be packaged, labeled, and appropriately marked and placarded. It must also be accompanied with the proper shipper papers in accordance with the Department of Transportation (DOT) regulations (49 CFR 172-180). If any universal waste is known to be damaged where the hazardous materials are no longer contained, it must be packaged and shipped in accordance with all hazardous waste regulations.

Rhode Island College utilizes qualified third-party vendors to transport and dispose of all universal waste accumulated at the college.

7.0 Campus Spill Reporting and Notification

In the event of a hazardous release due to damage to a universal waste the individual noticing the spill should immediately notify Rhode Island College Campus Police at (401) 456-8888. The caller should be prepared to state the location, product spilled (if known), and an approximate volume (if known). Other steps to be taken in the event of a spill are as follows:

- Remove people, including the caller, from the immediate spill area;
- Assure that others are aware of the spill and do not enter/access the spill area;
- Do not vacuum up spill or attempt to clean-up on your own; and
- All spilled material, including clean-up debris, must be collected, labeled, and managed as a hazardous waste.

Please refer to **Rhode Island College's Emergency Action Plan** or **Chemical Hygiene Plan** for more information on chemical spill/release procedures and notification.

8.0 Training

Rhode Island College will ensure all staff who may manage universal waste are trained on proper handling, labeling, collection, packaging, shipping, and other requirements outlined in this Plan and the state and federal regulations. Training records will be kept on file in the Facilities and Operations office. Retraining may be administered if deficiencies are found in the management, handling, and disposal of universal waste at RIC.

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Appendix A: Emergency Contacts

Title	Name/Contact/Info	Contact Info
Campus Police Director of Security and Safety/Chief of Campus Police	Col. James Mendonca	(401) 456-8888 jmendonca@ric.edu
Fire	Providence Fire Department North Providence Fire Department	911 or (401) 243-6060 911 or (401) 231-8500
Police	Providence Police Department North Providence Police Department	911 or (401) 232-3121 911 or (401) 231-4533
National Response Center		800-424-8802
RI Department of Environmental Management (RI DEM)		(401) 222-1360
US Environmental Protection Agency (US EPA)		(617) 223-7265
RI Emergency Management Agency		(401) 946-9996
Emergency Response Contractor	Clean Harbors Environmental Services	(401) 461-1300 or 800-641-0007
	Triumvirate Environmental	888-834-9697 (Office) 800-966-9282 (ER Line)
Hospital	Rhode Island Hospital	(401) 444-4000
Health Services Interim Director of Health Services	Dr. Marie Wilks	(401) 456-8055 mwilks@ric.edu
Interim Director of Facilities and Operations	Greg Gammell	(401) 456-8262 ggammell@ric.edu