



ENVIRONMENTAL HEALTH AND SAFETY STANDARD OPERATING PROCEDURES

SOP No. 24.01.01.W1.08AR Universal Waste Management Procedure

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Environmental Health and Safety at WTAMU is composed of two distinct but integrated environmental safety departments that report to the Vice President of Research and Compliance. Academic and Research Environmental Health and Safety (AR-EHS) is responsible for research and academic related compliance, which includes laboratory and academic research and the associated compliance committees. Fire and Life Safety (FLS-EHS) is responsible for fire related compliance and conducts fire and life safety inspections of campus buildings and assists with the testing all fire detection and suppression systems.

Supplements [TAMUS Regulation 24.01.01](#)

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1. Purpose

There are many common discarded products that, when disposed of, meet the EPA definition of being a hazardous waste. These products can include antifreeze, paint and paint related materials and residue (if managed in Texas), fluorescent bulbs, pesticides, and mercury containing electrical components.

Rather than trying to manage these diverse waste streams according to the hazardous waste regulations and the regulatory burden associated with such management, the EPA has issued a relaxed set of procedure to assist in managing batteries, pesticides, and mercury containing thermostats. These wastes are labeled Universal Waste (UW). The EPA anticipates adding additional materials to the list of universal wastes in the future. If these wastes are not handled as UW then they are considered “hazardous waste” and must be handled as such. An assessment of the waste as UW results in a significant cost savings to the university.

2. Scope

This procedure applies to all organizations at West Texas A & M University (WTAMU). It addresses the materials that are considered UW and the procedures for identifying, handling, and satellite accumulating UW.

Environmental Health and Safety shall

- Administer the Universal Waste Procedure with qualified/trained personnel.
- Assist departments and employees with the following:
 - Supply information on identifying and handling UW.
 - Supply the appropriate labeling information for all UW.
 - Provide updated labels or changes to label information.

- Designate UW satellite accumulation areas if necessary.
- Provide pickup of UW as requested.

Department/Components shall

- Comply with the WTAMU Universal Waste Procedure.
- Ensure employees are properly trained.
- Assist employees with the following:
 - Identify UW.
 - Coordinate with EHS to obtain the appropriate information for identification and handling of UW.
 - Provide labels, as needed, for UW.
 - Provide updated labels, or changes to label information.

Employees and students shall:

- Comply with the written WTAMU Universal Waste Program.

3. Small Quantity Handlers of Universal Waste

A small quantity handler of universal waste is prohibited from disposing, diluting, or treating any universal waste. The small quantity handler is not required to notify EPA of their universal waste handling activities.

3.1. Management Requirements

3.2. Labeling

The universal waste or the container in which the universal waste is placed in must be labeled or marked clearly with the words Universal Waste:, e.g., Batteries, Universal Waste; Fluorescent Bulbs, Universal Waste; Pesticides, Universal Waste; Paint Waste; or Universal Waste - Mercury Thermostats, as appropriate. See sample label appendix J.

3.3. Accumulation Time Limits

A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated or received from another handler. It is permissible to accumulate waste longer than one year from the date the universal waste is generated, if such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. However, the generator bears the burden of proving that such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. The handler must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste. This may be done by labeling each individual item with the date it became a waste, labeling the container with the earliest date that any waste was placed in the container, maintaining an inventory system that identifies the date each universal waste became a waste, maintaining an inventory system on-site that identifies the earliest date a group of containers of universal waste became a waste, or any other method which clearly demonstrates the length of time that the universal waste has been accumulated. Refer to section 5.0 for satellite accumulation procedures.

Facilities that mix universal wastes with regular trash must manage the commingled waste as universal waste or regular hazardous waste.

3.4. Employee Training

All employees who handle or have responsibility for managing universal waste must be informed of procedures for proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility. Refer to 24.01.01.W1.02AR for hazard communications procedures.

West Texas A & M University Environmental Health and Safety will follow the Texas A & M University System Policy [33.05.02 Required Employee Training](#).

Staff and faculty whose required training is delinquent more than 90 days will have their access to the Internet terminated until all trainings are completed. Only Blackboard and Single Sign-on will be accessible. Internet access will be restored once training has been completed. Student workers whose required training is delinquent more than 90 days will need to be terminated by their manager through Student Employment.

3.5. Spills

The handler must immediately contain all releases of universal wastes and other residues from universal wastes. It must be determined whether any material resulting from the release is hazardous waste, and if so, it must be managed as hazardous waste in compliance with the regular hazardous waste regulations.

3.6. Shipments

A small quantity handler of universal waste is prohibited from sending or taking universal waste to a place other than another universal waste handler or a destination facility. If a small quantity handler of universal waste self-transportes universal waste off-site, the handler becomes a universal waste transporter and must comply with the transporter requirements and Department of Transportation regulations.

If a universal waste being offered for off-site transportation meets the definition of hazardous materials under 49 CFR parts 171 through 180, a small quantity handler of universal waste must package, label, mark and placard the shipment, and prepare the proper shipping papers in accordance with the applicable Department of Transportation regulations under 49 CFR parts 172 through 180.

For purposes of the Department of Transportation regulations, a material is considered a hazardous waste if it is subject to the Hazardous Waste Manifest Requirements of the U.S. Environmental Protection Agency specified in 40 CFR part 262. Because universal waste does not require a hazardous waste manifest, it is not considered hazardous waste under the Department of Transportation regulations.

Some universal waste materials are regulated by the Department of Transportation as hazardous materials because they meet the criteria for one or more hazard classes specified in 49 CFR 173.2. As universal waste shipments do not require a manifest under 40 CFR 262, they may not be described by the DOT proper shipping name "hazardous waste, (liquid) or (solid), n.o.s.," nor may the hazardous material's proper shipping name be modified by adding the word "waste."

Before shipping universal waste to another universal waste handler you must ensure that the receiving handler agrees to accept the shipment.

If the shipment is rejected by the receiving handler or destination facility, the originating handler must either receive the waste back or agree with the receiving handler on a new facility to which the shipment will be sent.

A small quantity handler of universal waste may reject a shipment containing universal waste or a portion of a shipment containing universal waste that he has received from another handler. If a receiving handler rejects a shipment or a portion of a shipment, he must contact the originating handler to notify him of the rejection and to discuss reshipment of the load. They must agree to either send the shipment back to the originating handler or send the shipment to a new destination facility.

If a small quantity handler of universal waste receives a shipment containing hazardous waste that is not a universal waste, the handler must immediately notify the appropriate regional EPA office of the illegal shipment and provide the name, address, and phone number of the originating shipper. The EPA regional office will provide instructions for managing the hazardous waste.

Paint and Paint Related Waste (PPRW) managed as UW can only be sent off-site to another universal waste handler meeting the standards in 40 CFR Part 273.10-273.40, a destination facility meeting the standards in 40 CFR Part 273.60-273.62, or a foreign destination. So far, Texas is the only state that recognizes PPRW as UW. Therefore, shipments outside Texas would have to comply with the full hazardous waste requirements (for example, rules on transportation, manifests, and interim storage).

For portions of the trip through Texas, and any other states where the waste is a UW, you do not need a transporter with an EPA identification number per 40 CFR Part 263.11 (a hazardous waste transporter), and you do not need a manifest. However, for the portion of the trip through states that do not consider the waste to be an UW, a manifest is required, and a registered transporter in compliance with 40CFR Part 263 must move the waste.

You may use a common carrier for in-state transport of your PPRW managed as UW; however, this waste is not exempt from federal Department of Transportation (DOT) standards in 49 CFR Part 172 that apply to the shipment of hazardous waste.

The words “UW—Paint and Paint Waste” or “Paint and Paint-Related Waste” must be marked clearly on each container as described in 30 TAC Section 335.262 (F). In addition, this description also must be added to the DOT shipping description in accordance with 49 CFR Part 172.

3.7. Tracking Shipments

A small quantity handler of universal waste is not required to keep records of shipments of universal waste. The EPA assumes that the regular business documents used as part of the shipment will be sufficient to show that the material was managed correctly.

3.8. Batteries

Spent lead-acid batteries (car batteries) must be managed under the universal waste regulations or the regular hazardous waste regulations. There are certain exemptions for car batteries that are recycled under the regular hazardous waste regulations. According to the EPA 90% of all car batteries currently are being recycled, and they see no reason to change the regulations concerning car batteries.

Nickel cadmium and mercury oxide batteries contain mercury and other materials that must be dealt with under regular hazardous waste regulations. Because of this, they must be handled using the same recommendations as for lead acid batteries.

Alkaline batteries are not considered to be a hazardous or universal waste and can be disposed of in the garbage.

A used battery becomes a waste on the date it is discarded (e.g., when sent for reclamation) and an unused battery becomes a waste on the date the handler decides to discard it.

Batteries must be handled in a way that prevents releases of any universal waste or component of a universal waste to the environment. Batteries that show evidence of leakage or damage must be stored in containers that are closed, structurally sound, and compatible with the contents of the battery.

As long as the casing of each individual battery cell is not breached and remains intact and closed, the small quantity handler of universal waste may conduct the following activities:

- Sorting batteries by type
- Mixing battery types in one container
- Discharging batteries so as to remove the electric charge
- Regenerating used batteries
- Disassembling batteries or battery packs into individual batteries or cells
- Removing batteries from consumer products, or
- Removing electrolyte from batteries

Anyone who removes electrolyte from batteries, or who generates other waste associated with batteries (e.g., battery pack materials, discarded consumer products), must determine if this material is a regular hazardous waste.

If the electrolyte and/or other solid waste is a hazardous waste, it is subject to all applicable requirements of regular hazardous waste. The handler is considered the generator of hazardous waste and must comply with all of the generator requirements. This includes EPA notification and strict limits on storage. If the electrolyte or other solid waste is not a hazardous waste you may dispose of the material in a solid waste landfill.

Refer to attachment A for specific procedures for handling and disposal of lead acid batteries.

3.9. Pesticides

Pesticides are generally managed under the Federal Insecticide, Fungicide, and Rodenticide Act. Waste pesticides are usually generated due to a federal recall or from citizens cleaning out the garage. Universal waste pesticides include both recalled pesticides stocks of a suspended and canceled pesticide that are part of a voluntary or mandatory recall and unused pesticide products that are collected and managed as part of a waste pesticide collection program. Pesticides that are managed in accordance with the disposal instructions on the label on a working farm are exempt from the universal waste regulations.

The container must be labeled with original label and the wording Universal Waste-Pesticide(s). If the original label is not legible, it must be labeled either in accordance with DOT requirements or have a label officially recognized by the state as part of a pesticide collection program.

Refer to appendix B for specific procedures for handling and disposal of pesticides.

3.10. Thermostats

A small quantity handler of universal waste must manage mercury thermostats in a way that prevents release of any universal waste or component of a universal waste to the environment

A small quantity handler of universal waste must contain any thermostat that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, and compatible with the contents of the thermostat.

Ampoules containing mercury may be removed from thermostats provided:

- The ampoules are removed in a manner to prevent breakage of the ampoules.
- Ampoules are only removed over a tray or pan sufficient to collect and contain any mercury released in case of breakage.
- A mercury clean-up system is readily available.
- Spills or leaks from broken ampoules are immediately cleaned up and placed into a proper container.
- The area in which ampoules are removed is well ventilated and monitored to ensure compliance with applicable exposure levels for mercury.
- Employees removing ampoules are thoroughly familiar with proper waste mercury handling and emergency procedures, including transfer of mercury from containment devices to appropriate containers.
- Removed ampoules are stored in closed, non-leaking containers that are in good condition.
- Pack removed ampoules in the container with packing materials adequate to prevent breakage during storage, handling, and transportation, and
- Determine whether any solid waste generated as a result of the removal of mercury-containing ampoules or clean-up residues is characteristic of hazardous waste. If it is it must be managed in accordance with the regular hazardous waste regulations.

Refer to attachment C for specific procedures for handling and disposal of thermostats.

3.11. Paint (PPRW)

The UW rule under 30 TAC (Texas Administrative Code) Section 335.262 identifies paint and paint-related waste as any mixture of pigment and a suitable liquid that forms a closely adherent coating when spread on a surface, or any material that results from painting activities. This PPRW is considered hazardous if it meets criteria for hazardous waste as defined in TAC Section 335.1 (relating to definitions) or TAC 335.504 (relating to Hazardous Waste Determination). If these conditions are met then:

- No manifest is required to transport PPRW.
- No notification to the TCEQs required.
- You do not have to use a registered transporter.
- PPRW doesn't count towards your total hazardous waste generator status.
- PPRW is exempt from year-end fees.
- The waste may be satellite-accumulated for up to one year.

It is important to note that there are restrictions as to what PPRW can be considered UW. The following is a list of the PPRW's that qualify for handling as UW.

- Used or unused paint.
- Spent solvents used in painting (for example, combinations of thinner and paint, lacquer, or varnish).
- Personal Protective Equipment (PPE), contaminated rags, gloves, and debris resulting from painting operations.
- Coating waste paint, over spray, overrun paints, paint filters, paint booth stripping materials, paint sludges from water-wash curtains.
- Cleanup residues from spills of paint (this excludes cleanup residues from a spill of PPRW being managed as UW).
- Cleanup residues from painting and paint-removal activities.
- Other paint-related wastes generated as a result of the removal of paint.

Empty paint containers must be allowed to dry before disposal and should be crushed or otherwise rendered unusable as a storage container; this can also be achieved by puncturing the containers. Paint related waste should also be allowed to dry before disposal. See 24.01.01.W1.07AR for empty container procedures.

Refer to attachment D for instructions on handling aerosol paint cans.

Refer to attachment D for specific procedures for handling and disposal of PPRW.

3.12. Fluorescent Waste Lamps

Waste lamps are hazardous due to exhibiting one or more of the characteristics of hazardous waste (40 CFR part 261), and may include mercury-containing lamps. Other examples of UW lamps include, but are not limited to, fluorescent, HID (High Intensity Discharge), neon, mercury vapor, high-pressure sodium, and metal halide lamps.

According to EPA studies, many fluorescent lamps exhibit the toxicity characteristic (TC) for mercury and are therefore classified as a hazardous waste (HW). Some high intensity discharge (HID) and other types of lamps may also exhibit the TC for lead. According to the EPA, in the past, spent lamps that have failed the TC for mercury have not been managed as a HW. To remedy this problem the EPA amended the Universal Waste Rule (UWR) to include **all** hazardous waste (HW) lamps (40 CFR 273.13 and 273.33). This rule allows generators to manage lamps with less stringent requirements than other HW.

Universal waste handlers must store hazardous waste lamps in containers and/or packaging that remain closed, are structurally sound, are adequate to prevent breakage, are compatible with contents of lamps, and that lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Handlers also must contain any universal waste lamps that show evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous waste to the environment. If a release occurs, handlers of universal waste must immediately contain all releases of universal waste and any residues from universal wastes. In addition, universal waste handlers must determine whether any material resulting from a release is a hazardous waste, and if so, must manage the hazardous waste in compliance with all applicable provisions of 40 CFR parts 260 through 272.

Refer to attachment E for specific procedures for handling and disposal of waste lamps.

4. Large Quantity Handlers of Universal Waste

A large quantity handler of universal waste must provide written notification of universal waste management to the Regional Administrator and receive an EPA Identification Number before reaching the 5,000 kilogram storage limit. If the large quantity handler of universal waste already has an EPA Identification Number the facility is not required to re-notify.

A large quantity handler of universal waste must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

A large quantity handler must keep records on where the waste was shipped, the quantity, the date it was shipped, and the date it was received at the facility. These records must be retained for three years.

5. Universal Waste Transporters

A universal waste transporter must comply with all applicable U.S. Department of Transportation regulations in 49 CFR part 171 through 180 for transport of any universal waste that meets the definition of hazardous material in 49 CFR 171.8.

For purposes of the Department of Transportation regulations, a material is considered a hazardous waste if it is subject to the Hazardous Waste Manifest Requirements of the U.S. Environmental Protection Agency specified in 40 CFR part 262. Because universal waste does not require a hazardous waste manifest, it is not considered hazardous waste under the Department of Transportation regulations.

Some universal waste materials are regulated by the Department of Transportation as hazardous materials because they meet the criteria for one or more hazard classes specified in 49 CFR 173.2. As universal waste shipments do not require a manifest under 40 CFR 262, they may not be described by the DOT proper shipping name "hazardous waste, (I) or (S), n.o.s.," nor may the hazardous material's proper shipping name be modified by adding the word "waste."

A universal waste transporter may only store the universal waste at a universal waste transfer facility for ten days or less. If it is stored for more than ten days, the transporter becomes a universal waste handler and must comply with the waste handler requirements.

All releases of universal wastes and other residues from universal wastes must be immediately contained. If you are responsible for managing waste from a spill or release, you must determine whether the resulting waste is hazardous according to 40 CFR Part 261. If hazardous, it must be managed in accordance with all applicable requirements found in 40 CFR Parts 260 through 272. If the resulting waste is non-hazardous, then it must be managed in accordance with all applicable state and local requirements.

5.1. Off-site Shipments

A universal waste transporter is prohibited from transporting the universal waste to a place other than a universal waste handler, a destination facility, or a foreign destination.

If the universal waste being shipped off-site meets the Department of Transportation's definition of hazardous materials under 49 CFR 171.8, the shipment must be properly described on a shipping paper in accordance with the applicable Department of Transportation regulations under 49 CFR part 172.

6. Universal Waste Satellite Accumulation Procedure

All generators of hazardous waste are allowed to accumulate hazardous wastes in Satellite Accumulation Areas (SAAs). Hazardous wastes require special handling and reporting procedures. This section outlines the requirements and best management practices (BMP) for operating a SAA. Any questions about the application of this procedure should be referred to the WTAMU Environmental Health and Safety (EHS).

6.1. Quantity

A UWSAA (Universal Waste Satellite Accumulation Area) may accumulate no more than 55 gallons of universal waste at any single UWSAA. If a UWSAA exceeds these amounts, the excess MUST be transported to the primary universal waste accumulation area within 72 hours.

6.2. Location

- A UWSAA must be located at or near the site of the waste stream generation.
 - UWSAA may not be located across the hall or any publicly accessible space.
- The UWSAA should be in a controlled access location.
- All entrances to the UWSAA should have the names of the primary operators and secondary operators posted.

6.3. Containers

- Must be compatible with the waste being stored.
 - Unbreakable or shatter resistant containers should be used.
- All waste containers should be in good condition.
- Caps should be a screw top (or similar) and not a cork or stopper, which can separate from the container should it tip or fall.
- The use of paint can lids originally supplied with the paint containers is recommended.
- Must be labeled (see appendix J):
 - As to the contents
 - - Mixtures must indicate the individual components and percentage on the label.
 - Date first started being accumulated.
 - These labels must be placed on the containers so that they are readily seen for inspection.
 - The date the container is full.
 - If you are reusing a container to store anything other than what was originally stored in the container, destroy the original product label and replace with a new one.
- Must be sealed, except during transfer of waste to and from the container
 - Funnels MUST not be used as lids or stored in the opening of the container.
- Keep solids and liquids separate.
- Containers are considered full when the volume in the container is 3 inches from the top.
 - Containers with a total height of 8 inches or less can be filled to within 1 inch from the top. The minimum free space of any container will NEVER be less than 1 inch.
 - A full container should be picked up for transport to the primary containment area as soon as practicable. Contact EHS to arrange for pickup.
- Containers should be stored in a secondary containment system, sized to hold the maximum amount of waste that may leak from any one container.
 - Secondary containment may be in the form of trays, tubs, or lined boxes or pallets with containerized bases.
 - Secondary containment must be able to keep potential spills away from drains.
 - Secondary containment must be made of material compatible with the materials stored within it.

6.4. Safety Equipment

- Each UWSAA will have an appropriate spill kit on hand. This includes proper absorbents and neutralizing materials and sufficient quantities for the amounts of waste on hand at the UWSAA. The spill kit should include any required personnel protective equipment (PPE) that may be needed to clean up a small spill. A notice of the location of the spill kit and a plan for how to use them will be mounted in an easily accessible location.
- UWSAAs that accumulate flammable waste shall have a fire extinguisher located in a manner that is readily accessible. The fire extinguisher will be of a size and type appropriate for the hazardous waste being accumulated.
- Emergency numbers will be posted. Numbers such as the fire department, Environmental Health and Safety, and primary operator of the UWSAA will be posted.

6.5. Administration

- Each department is responsible for designating in writing the primary operator of each UWSAA in each department.

- The primary operator may designate secondary operators to assist in the operation of each UWSAA.
- The primary and secondary operators must have access to the UWSAA.
- The primary operator is responsible for registration of the UWSAA with the department and EHS. See the form in appendix G. This form should be kept in a binder with the department and with EHS.
 - The primary operator is responsible for ensuring that information is kept current.
 - The following is the minimum information that must be reported for registration.
 - Location of UWSAA.
 - Primary operator.
 - Type of waste being accumulated.
 - Special precautions that may be required.
 - Estimates of the total volume universal waste accumulated in one month.
 - If operational experience proves that the amount of waste produced was consistently above or below the estimate filed, the estimate should be changed to reflect actual experience.
 - The primary operator is responsible for filing a form with the department and EHS listing the primary and secondary operators and their contact information. See appendix H.
 - The primary operator is responsible for ensuring that this form remains up to date.
 - The primary operator is responsible for ensuring that an inspection of the UWSAA is performed every fiscal quarter. See appendix I. The results of the inspection shall be kept on file for a minimum of 3 years. At a minimum the following must be checked:
 - All containers are correctly labeled and in good shape.
 - Estimated volume in the UWSAA.
 - All containers for non-solid wastes are sealed and safely stowed.
 - Spill kit and fire extinguisher are available.
 - Spill and emergency response plans and numbers are posted.
 - Any full containers.
 - The primary operator is responsible for ensuring that any secondary operator is trained in these standards and in the requirements for operation of the UWSAA.
- Coordination with EHS for hazardous waste pickup is important. EHS must be given sufficient time to arrange for pickup of any universal wastes.

7. Destination Facilities

The operator of a destination facility must be in compliance with all of the regular requirements for a hazardous waste treatment or disposal facility. The destination facility must keep a record of each shipment of universal waste received at the facility. The record may take the form of a log, invoice, manifest, bill of lading, or other shipping document. It is the same information that a large handler must retain. These records must be maintained for three years.

No official state records may be destroyed without permission from the Texas State Library as outlined in [Texas Government Code, Section 441.187](#) and [13 Texas Administrative Code, Title 13, Part 1, Chapter 6, Subchapter A, Rule 6.7](#). The Texas State Library certifies Agency retention schedules as a means of granting permission to destroy official state records.

West Texas A & M University Records Retention Schedule is certified by the Texas State Library and Archives Commission. West Texas A & M University Environmental Health and Safety will follow [Texas A & M University Records Retention Schedule](#) as stated in the Standard Operating Procedure [61.99.01.W0.01 Records Management](#). All official state records (paper, microform, electronic, or any other media) must be retained for the minimum period designated.

8. Governing Documents

9. Texas A&M University System Environmental Health and Safety Standards 24.02.03.EHS-01 to EHS-19.Record Retention

No official state records may be destroyed without permission from the Texas State Library as outlined in [Texas Government Code, Section 441.187](#) and [13 Texas Administrative Code, Title 13, Part 1, Chapter 6, Subchapter A, Rule](#)

[6.7](#). The Texas State Library certifies Agency retention schedules as a means of granting permission to destroy official state records.

West Texas A & M University Records Retention Schedule is certified by the Texas State Library and Archives Commission. West Texas A & M University Environmental Health and Safety will follow [Texas A & M University Records Retention Schedule](#) as stated in the Standard Operating Procedure [61.99.01.W0.01 Records Management](#). All official state records (paper, microform, electronic, or any other media) must be retained for the minimum period designated.

10. Training

West Texas A & M University Environmental Health and Safety will follow the Texas A & M University System Policy [33.05.02 Required Employee Training](#). Staff and faculty whose required training is delinquent more than 90 days will have their access to the Internet terminated until all trainings are completed. Only Blackboard and Single Sign-on will be accessible. Internet access will be restored once training has been completed. Student workers whose required training is delinquent more than 90 days will need to be terminated by their manager through Student Employment.

11. Definitions

Battery: A device consisting of one or more electrically connected electrochemical cells, which is 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. It does not include electrical generators but only includes devices that can store electrical power.

EPA: Environmental Protection Agency.

Destination facility: A facility that treats, disposes of, or recycles a particular category of universal waste. A facility at which a particular category of universal waste is only accumulated is not a destination facility for purposes of managing that category of universal waste.

Generator: Any person, by site, whose act or process produces universal waste or whose act first causes a universal waste to become subject to regulation.

Large Quantity Handler of Universal Waste: A universal waste handler who accumulates 5,000 kilograms or more total of universal waste at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which 5,000 kilograms or more total of universal waste is accumulated.

On-site: The same or geographically contiguous property which may be divided by public or private right-of-way, provided that the entrance and exit between the properties is at a cross-roads intersection and access is by crossing as opposed to going along the right of way.

Pesticide: Any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant. It does not include new animal drugs or feeds that contain animal drugs.

PPE: Personal Protective Equipment.

PPRW (Paint and Paint Related Waste): Any paint and paint related waste such as leftover paint or painting accessories such as used solvents or painting gear with paint or solvents on it.

Small Quantity Handler of Universal Waste: A universal waste handler who does not accumulate more than 5,000 kilograms total of universal waste on the contiguous property of the facility at any time.

TAC: Texas Administrative Code.

TCEQ: Texas Commission on Environmental Quality.

Thermostat: A temperature control device that contains metallic mercury in an ampoule attached to a bimetal-sensing element and mercury-containing ampoules that have been removed from these devices.

Universal Waste: batteries, pesticides, and mercury containing thermostats.

Universal Waste Handler: The owner or operator of a facility that generates or receives universal waste from other universal waste handlers, accumulates universal waste, and sends universal waste to another universal waste handler or to a destination facility. It does not include the treatment, disposal, recycling, or transportation of universal waste.

Universal Waste Transfer Facility: Any transportation-related facility where shipments of universal waste are held during the normal course of transportation for ten days or less.

Universal Waste Transporter: A person engaged in the off-site transportation of universal waste by air, rail, highway, or water under the requirements of this part.

Waste Lamps: Lamps that are hazardous due to exhibiting one or more of the characteristics of hazardous waste (40 CFR part 261) and may include mercury containing lamps.

Related Statutes, Policies, or Requirements

Contact Office

WTAMU Environmental Health and Safety
(806) 651-2270

LEAD ACID, RECHARGEABLE, AND MERCURY OXIDE BATTERIES

Spent lead-acid batteries (car batteries) must be managed under the universal waste regulations or the regular hazardous waste regulations. There are certain exemptions for car batteries that are recycled under the regular hazardous waste regulations.

Ni-Cad and mercury oxide batteries contain mercury and other materials that must be dealt with under regular hazardous waste regulations. Because of this, they must be handled using the same recommendations as for lead acid batteries.

A used battery becomes a waste on the date it is discarded (e.g., when sent for reclamation) and an unused battery becomes a waste on the date the handler decides to discard it.

Batteries must be handled in a way that prevents releases of any universal waste or component of a universal waste to the environment. Batteries that show evidence of leakage or damage must be stored in containers that are closed, structurally sound, and compatible with the contents of the battery.

As long as the casing of each individual battery cell is not breached and remains intact and closed the handler can:

- Sort the batteries by type.
- Mix battery types in one container.
- Discharge batteries so as to remove the electric charge.
- Regenerate used batteries.
- Disassemble batteries or battery packs into individual batteries or cells.
- Remove batteries from consumer products, or
- Remove electrolyte from batteries.

Anyone who removes electrolyte from batteries, or who generates other waste associated with batteries (e.g., battery pack materials, discarded consumer products) must determine if this material is a regular hazardous waste.

If the electrolyte and/or other solid waste is a hazardous waste, it is subject to all applicable requirements of regular hazardous waste. This includes strict limits on storage. If the electrolyte or other solid waste is not a hazardous waste you may dispose of the material in a solid waste landfill.

Alkaline batteries are considered to be regular waste and can be disposed of in the trash.

If your department does not produce a lot of universal waste batteries then a pickup request should be completed and submitted to EHS immediately.

If your department handles universal waste batteries on a frequent basis then the batteries should be satellite accumulated as directed in the WTAMU Universal Waste Management Procedure. (24.01.01.W1.08AR)

WHAT TO DO:

Users determine the type of battery (lead acid, Ni-Cad, mercury oxide, alkaline, etc.).

Lead acid batteries are considered to be a universal waste and should be labeled with a Universal Waste Label (see appendix J).

Depending on the amount and frequency of generation of UW batteries, they should be reported to EHS for immediate pickup.

Ni-Cad and mercury oxide batteries are considered to be a hazardous waste and should be labeled or placed in a container labeled with a hazardous waste label. A hazardous waste pickup request should be completed and submitted to Environmental Health and Safety as soon as possible.

If there are any questions about the handling and disposal of any type of battery please refer to 24.01.01.W1.08AR, or contact EHS for assistance.

DO NOT:

- Place the battery in the Primary Universal Waste or Hazardous Waste Area yourself.
- Forget to submit a pickup request to Environmental Health and Safety.
- Puncture or incinerate batteries.
- Lay batteries on their sides.
- Leave batteries in direct sunlight.
- Place batteries in a trash container.
- Attempt to recharge batteries that are not intended for recharging.

EHS CONTACT INFORMATION:

Environmental Health and Safety

Killgore Research Center, Room 184

Telephone: (806) 651-2270 Fax: (806) 651-2733 E-mail: AR-EHS@mail.wtamu.edu

PESTICIDES

Pesticides are generally managed under the Federal Insecticide, Fungicide and Rodenticide Act. Waste pesticides are usually generated due to a federal recall or from citizens cleaning out the garage. Universal waste pesticides include both recalled pesticides, stocks of a suspended and canceled pesticides that are part of a voluntary or mandatory recall, and unused pesticide products that are collected and managed as part of a waste pesticide collection program. Pesticides that are managed, in accordance with the disposal instructions on the label on a working farm are exempt from the universal waste regulations.

The container must be labeled with original label and a Universal Waste Label. If the original label is not legible it must be labeled either in accordance with DOT requirements or have a label officially recognized by the State of Texas as part of a pesticide collection program.

If your department does not handle many UW pesticides, then contact EHS immediately for pickup of small amounts.

If your department does handle large amounts of UW pesticides, then they can be satellite accumulated as described in the WTAMU Universal Waste Management Procedure (24.01.01.W1.08AR).

WHAT TO DO:

Determine if the pesticide in question meets the criteria of a UW pesticide.

If the pesticide is considered to be a UW, it should be labeled with a Universal Waste Label (see appendix J).

Make sure pesticide containers are placed in a box or flat that will allow for safe carrying.

Depending on the amounts or frequency of generation of UW pesticides, they should be placed either in a Universal Waste Holding Area designated by Environmental Health and Safety for pesticides or immediately reported to EHS for pickup.

DO NOT:

- Place the pesticide containers in the Primary Universal Waste Area yourself.
- Forget to submit a pickup request to Environmental Health and Safety.
- Puncture or incinerate pesticide containers.
- Lay pesticide containers on their sides.
- Leave pesticide containers in direct sunlight.
- Place pesticide containers in a trash container.
- Take the pesticide containers home for your own use.

EHS CONTACT INFORMATION:

Environmental Health and Safety

Killgore Research Center, Room 184

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THERMOSTATS

Mercury thermostats must be managed in a way that prevents releases of any universal waste or component of a universal waste to the environment.

A small quantity handler of universal waste must contain any thermostat that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, and compatible with the contents of the thermostat.

Ampules containing mercury may be removed from thermostats provided

- The ampules are packaged and may be removed in a manner to prevent breakage of the ampoules.
- Ampoules are only removed over a tray or pan sufficient to collect and contain any mercury released in case of breakage.
- A mercury clean-up system is readily available.
- Spills or leaks from broken ampoules are immediately cleaned up and placed into a proper container.
- The area in which ampoules are removed is well ventilated and monitored to ensure compliance with applicable exposure levels for mercury.
- Employees removing ampoules are thoroughly familiar with proper waste mercury handling and emergency procedures, including transfer of mercury from containment devices to appropriate containers.
- Removed ampoules are stored in closed, non-leaking containers that are in good condition.
- Packs removed ampoules in the container with packing materials adequate to prevent breakage during storage, handling, and transportation.
- Determine whether any solid waste generated as a result of the removal of mercury-containing ampoules or clean-up residues is characteristic of hazardous waste. If it is, it must be managed in accordance with the regular hazardous waste regulations.

WHAT TO DO:

Thermostats should be placed in a box or bag so that they can be carried easily.

Thermostats containing mercury are considered to be a universal waste. Contain the mercury and mercury containing substances and contact EHS for pickup.

Labeled waste should be placed in a Universal Waste Holding Area designated by Environmental Health and Safety for thermostats.

DO NOT:

- Place the thermostats in the Primary Universal Waste Area yourself.
- Forget to notify Environmental Health and Safety.
- Puncture or incinerate the mercury-containing mercury ampoules.
- Crush the thermostats.
- Place thermostats in a trash container.

EHS CONTACT INFORMATION:

Environmental Health and Safety

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PAINT (PPRW)

The UW rule under 30 TAC Section 335.262 identifies paint and paint-related waste as any mixture of pigment and a suitable liquid that forms a closely adherent coating when spread on a surface or any material that results from painting activities. This PPRW is considered hazardous if it meets criteria for hazardous waste as defined in TAC Section 335.1 (relating to definitions) or TAC 335.504 (relating to Hazardous Waste Determination). If these conditions are met then:

- No manifest is required to transport PPRW.
- No notification to the TCEQ is required.
- You don't have to use a registered transporter.
- PPRW doesn't count towards your total hazardous waste generator status.
- PPRW is exempt from year-end fees.
- The waste may be satellite accumulated for up to one year.

It is important to note that there are restrictions as to what PPRW can be considered UW. The following is a list of the PPRW's that qualify for handling as UW.

- Used or unused paint.
- Spent solvents used in painting (for example, combinations of thinner and paint, lacquer, or varnish).
- Personal Protective Equipment (PPE), contaminated rags, gloves, and debris resulting from painting operations.
- Coating waste paint, over spray, overrun paints, paint filters, paint booth stripping materials, paint sludges from water-wash curtains.
- Cleanup residues from spills of paint (this excludes cleanup residues from a spill of PPRW being managed as UW).
- Cleanup residues from painting and paint-removal activities.
- Other paint-related wastes generated as a result of the removal of paint.

Empty paint containers must be allowed to dry before disposal, and ideally need to be crushed or otherwise rendered unusable as a storage container. This can also be achieved by puncturing the containers. Paint related waste should also be allowed to dry before disposal.

NOTE: Spray paint cans are subject to procedures outlined in 24.01.01.W1.07AR and must be handled differently than regular PPRW. Place spray cans in a separate appropriately labeled container and contact EHS.

For any questions concerning PPRW refer to 24.01.01.W1.08AR or contact EHS for assistance.

Water based paints (such as tempa paint) are not considered PPRW or as a hazardous waste. Water used in cleaning up this type of paint can be safely washed down the drain.

ALL types of petroleum-based thinners and solvents must be satellite accumulated for pickup by EHS. These types of solvents are good candidates for recycling and reuse.

WHAT TO DO:

Determine if the paints or solvents in question are a universal waste or a normal waste that can be disposed of in the trash.

Determine if your department produces enough PPRW to be satellite accumulated, or if production of PPRW is infrequent enough to have the wastes reported to EHS for immediate pickup. If a satellite is accumulating the waste, then the labeled waste should be placed in a Universal Waste Holding Area designated by Environmental Health and Safety for PPRW.

PPRW is considered to be a universal waste and should be labeled with a Universal Waste Label. (See appendix J.)

Try to let any waste covered with wet paint to dry before handling as waste. This includes paint cans or plastic buckets.

Place any used drop cloths, masking materials, roller cartridges, or any other solid paint related wastes in plastic trash bags and/or cardboard boxes.

Try to collect reuse paint thinners and solvents. (Most paints will settle out and allow the clear thinner to be poured off.)

DO NOT:

- Place the PPRW in the Primary Universal Waste Area yourself.
- Pour solvents or thinners down the drain.
- Forget to submit a pickup request to Environmental Health and Safety.
- Incinerate paint or solvent containers.
- Lay paint containers on their sides.
- Leave paint or solvent containers outside where they might be picked up by bystanders.
- Place paint or solvent containers in a trash container.
- Take paint or solvent containers home for personal use.

EHS CONTACT INFORMATION:

Environmental Health and Safety

Killgore Research Center, Room 184

Telephone: (806) 651-2270 Fax: (806) 651-2733 E-mail: AR-EHS@mail.wtamu.edu

FLUORESCENT WASTE LAMPS

Fluorescent waste lamps are lamps that are hazardous due to exhibiting one or more of the characteristics of hazardous waste (40 CFR part 261) and may include mercury-containing lamps. Other examples of UW lamps include, but are not limited to, fluorescent, HID, neon, mercury vapor, high-pressure sodium, and metal halide lamps.

According to EPA studies, many fluorescent lamps exhibit the toxicity characteristic (TC) for mercury and are therefore classified as a hazardous waste (HW). Some high intensity discharge (HID) and other types of lamps may also exhibit the TC for lead. According to the EPA, in the past, spent lamps that have failed the TC for mercury have not been managed as a HW. To remedy this problem the EPA amended the Universal Waste Rule (UWR) to include **all** hazardous waste (HW) lamps (40 CFR 273.13 and 273.33). This rule allows generators to manage lamps with less stringent requirements than other HW.

Universal waste handlers must store hazardous waste lamps in containers and/or packaging that remain closed, are structurally sound, are adequate to prevent breakage, are compatible with contents of lamps, and that lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Handlers also must contain any universal waste lamps that show evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous waste to the environment. If a release occurs, handlers of universal waste must immediately contain all releases of universal waste and any residues from universal wastes. In addition, universal waste handlers must determine whether any material resulting from a release is a hazardous waste, and if so, must manage the hazardous waste in compliance with all applicable provisions of 40 CFR parts 260 through 272.

WHAT TO DO:

If it is not normally your job to change light bulbs **don't do it!** Notify whomever it is that changes the light bulbs in your department, and they will take care of the problem.

If it **is** your responsibility to change light bulbs then do the following:

- Determine if the waste lamps in question are considered to be UW.
- Place fluorescent bulbs in a container that can be transported easily; preferably the box(s) in which the replacement bulbs were received.
- Fluorescent waste lamps are considered to be a universal waste and should be labeled with a Universal Waste Label (see appendix J).
- After labeling the waste it should be placed in a Universal Waste Holding Area designated by Environmental Health and Safety for fluorescent waste lamps.

DO NOT:

- Change light bulbs if it is not your job to do so.
- Place the fluorescent waste lamps in the Primary Universal Waste Area yourself.
- Forget to submit a pickup request to Environmental Health and Safety.
- Crush or incinerate fluorescent waste lamps.
- Place fluorescent waste lamps in a trash container.

EHS CONTACT INFORMATION:

Environmental Health and Safety
Killgore Research Center, Room 184
Telephone: (806) 651-2270 Fax: (806) 651-2733 E-mail: AR-EHS@mail.wtamu.edu

UWSAA Registration Form

Date:

TO: Environmental Health and Safety
Killgore Research Center, Room 184
Telephone: (806) 651-2270 Fax: (806) 651-2733 E-mail: AR-EHS@mail.wtamu.edu

From: _____
Dept.: _____

Telephone: _____
Fax: _____

Ref: 24.01.01.W1.08AR Universal Waste Management Procedure

Location of UWSAA: (BLDG & RM.) _____

Primary Operator: _____

Type of waste being accumulated:

Special precautions that may be required:

Estimates of the total volume of universal waste accumulated in one month:

UWSAA Primary and Secondary Operator Contact Information Form

Date:

TO: Environmental Health and Safety
Killgore Research Center, Room 184
Telephone: (806) 651-2270 Fax: (806) 651-2733 E-mail: AR-EHS@mail.wtamu.edu

From: _____ Telephone: _____
Dept.: _____ Fax: _____

Ref: 24.01.01.W1.08AR Universal Waste Management Procedure

Location of UWSAA: (BLDG & RM.) _____

Primary Operator (24 hour contact information):

Name: _____

Daytime Telephone: _____

Night-time Telephone: _____

Secondary Operator(s) (24 hour contact information)

Name: _____

Daytime Telephone: _____

Night-time Telephone: _____

Name: _____

Daytime Telephone: _____

Night-time Telephone: _____

Name: _____

Daytime Telephone: _____

Night time Telephone: _____

UWSAA Quarterly Inspection Form

Ref: 24.01.01.W1.08AR Universal Waste Management Procedure

1. UWSAA Location: _____

The following checks are the minimum required each fiscal quarter:

Name of Inspector and Date of Inspection.

All containers correctly labeled and in good shape?

- If no, has corrective action been taken?

Estimated total volume of waste in the UWSAA? (In gallons for liquids and pounds for solids)

- If liquid volume is 50 gallons or greater, IMMEDIATELY contact EHS for pickup!

All containers sealed and safely stowed?

Spill kit and fire extinguisher available and charged?

Spill and emergency response plans and numbers posted?

Any full containers?

- If yes, has EHS been contacted for pickup?

Date	Inspector Name	Labeling & Containers (Yes/no)	Containers Safely stowed? (Yes/no)	Spill Kit (Yes/no)	Fire Extinguisher (Yes/no)	Emergency Plan & #'s Posted? (Yes/no)	Estimated Volume on Hand? (gallons)	Any full Containers ?	Comments?

Any questions or concerns about this form or inspection requirements please contact EHS.

Universal Waste Label
ONLY to Be Used by EHS Staff

