



**Subject: Universal Waste Minimization and Disposal Policy**

Policy No. 120

**APPLICATION**

All New York University academic, commercial and residential facilities.

**PURPOSE**

It is the intention of New York University to 1) comply with all federal, state and local laws which pertain to the minimization and disposal of universal waste; 2) ensure that human health and the environmental are protected; 3) ensure the safe use, storage and disposal of universal waste; and 4) ensure the minimization of the amount of universal waste generated.

**POLICY AND GENERAL INFORMATION**

The Universal Waste Rule allows certain hazardous wastes known as “Universal Waste” to be managed under streamlined requirements that will encourage the collection and recycling of these wastes.

**1.0 RESPONSIBILITIES**

1.1 The Senior Director of Environmental Services or designee is responsible for:

- 1.1.1 developing the Universal Waste Minimization and Disposal Policy;
- 1.1.2 providing the departments with information about the Policy;
- 1.1.3 assisting the departments in implementing the Policy;
- 1.1.4 periodically evaluating the effectiveness of the Policy; and
- 1.1.5 maintaining universal waste disposal records.

1.2 Department Chairpersons, or designees, are responsible for compliance with the Policy in their departments. Their responsibilities include:

- 1.2.1 ensuring that all employees who work with universal waste receive information about this Policy; and
- 1.2.2 ensuring that universal waste is collected in appropriate containers, stored and labeled properly, and removed on a regular basis.

1.3 Employees who work with universal waste are responsible for:

- 1.3.1 being familiar with the hazards of universal waste;
- 1.3.2 collecting, storing, and labeling universal waste in accordance with this Policy; and

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1.3.3 notifying their supervisors of any exposures, spills or any other pertinent problems.

## 2.0 DEFINITIONS

2.1 Universal Waste (UW) is a hazardous waste that is managed under streamlined requirements so to encourage collection and recycling of these wastes. There are four types of wastes considered to be universal wastes:

- 1) **Batteries** such as nickel-cadmium (Ni-Cd) and small sealed lead-acid batteries, which are found in many common items in the business and home setting, including electronic equipment, mobile telephones, portable computers, and emergency backup lighting.
- 2) **Thermostats**, which can contain as much as 3 grams of liquid mercury and are located in almost any building, including commercial, industrial, agricultural, community, and household buildings.
- 3) **Lamps**, which typically contain mercury and sometimes lead, and are found in businesses and households. Examples of common types of lamps include fluorescent, high intensity discharge (HID), neon, mercury vapor, high-pressure sodium, and metal halide lamps.
- 4) **Agricultural pesticides** that have been recalled or banned from use, are obsolete, have become damaged, or are no longer needed due to changes in cropping patterns or other factors.

## 3.0 WASTE MINIMIZATION

3.1 In certain applications non-mercury containing products can be substituted. In the case of thermometers, manometers, etc., digital, dial thermocouples, and alcohol thermometers are practical and accurate substitutes. When replacing fluorescent light tubes, low mercury containing bulbs should be used. However, these will still be collected as Universal Waste.

## 4.0 WASTE COLLECTION/WASTE DISPOSAL

4.1 **Used Fluorescent Light Tubes** are considered universal waste. Also included are high intensity discharge (HID) lamps, mercury vapor, high-pressure sodium and neon tubes. Containers for collection of "Used Light Bulbs" are delivered to the academic and housing facilities. Each bulb container is supplied with a plastic lining that must be pulled up and over the top edges of the container and the bulbs placed inside. The container must remain closed at all times, except when adding bulbs. According to federal regulations, NYU is allowed to accumulate used bulbs for one year from the date the first bulb is collected. If the container is full, or is approaching the one-year deadline for disposal, Environmental Services (x81450) should be notified to arrange for disposal. For labeling information please see Section 5.0. **Broken fluorescent light tubes are considered hazardous waste and must be collected and disposed of under the guidelines of the Hazardous Waste Minimization and Disposal Program, Policy No. 101. For additional information please refer to the Mercury Safety Policy No. 102.**

4.2 **Old Mercury-Containing Thermostats** are also considered universal waste. When replacing old thermostats look to see if the thermostat contains a mercury switch. The mercury switch is a

small self-enclosed glass tube with visible liquid mercury inside. You may accumulate thermostats in a sealed container. When the container is full, please contact Environmental Services (x81450) to arrange for disposal. For labeling requirements, see section 5.0 of this policy. **If the mercury switch should break, it must be managed as hazardous waste. Please refer to Mercury Safety Policy No. 102.**

- 4.3 **Used Batteries** are a concentrated source of a few types of heavy metals. The main constituents of concern for human health and the environment include: cadmium, lead and mercury. The following is a table of the most commonly used batteries that will be managed as universal waste.

TYPE OF BATTERY	COMMON USES	HAZARDOUS COMPONENT
<b>Non-rechargeable</b>		
Carbon Zinc	Many uses	*
Alkaline	Many uses	*
Mercuric Oxide	Medical equipment	Mercury
Silver Oxide (Button)	Calculators, watches, cameras	Silver
Zinc-air (Button)	Hearing aids, pagers, cameras	Mercury
Lithium	Computers, cameras	Lithium
<b>Rechargeable</b>		
Small Sealed Lead-Acid	Tools, camcorders Small generators	Lead
Large Sealed Lead-Acid	Large generators	Lead
Alkaline	Many uses	**
Nickel-Cadmium	Smoke alarms, tools, small generators	Cadmium

\* Since 1993, domestically produced alkaline and carbon zinc batteries contain no added mercury and are essentially mercury-free but will still be managed as universal waste.

\*\*Since early 1995, rechargeable alkaline batteries contain no added mercury and are essentially mercury-free but will still be managed as universal waste.

**Leaking batteries should be considered hazardous waste and placed in separate non-leaking, sealed containers and labeled with NYU's hazardous waste label. Please see section 5.0 Labeling for more detail.**

- 4.4 **Used Agricultural Pesticides** is not a concern at the University. However, if there is ever a question about waste please call Environmental Services (x81450).

## 5.0 LABELING

- 5.1 **Used Light Bulbs** – Containers must have a label affixed with the words “Universal Waste - Used Light Bulbs” and must have the date marked on the label from the day the first tube was placed in the container. These labels are available on Environmental Services website [www.nyu.edu/environmental.services/wastelabels.shtml](http://www.nyu.edu/environmental.services/wastelabels.shtml) or from Environmental Services (x81450).
- 5.2 **Used Mercury-Containing Thermostats** – Containers must have a label affixed with the words “Universal Waste - Used Mercury-Containing Thermostats” and must have the date marked on the label from the day the first thermostat was placed in the container. These labels are available on Environmental Services website [www.nyu.edu/environmental.services/wastelabels.shtml](http://www.nyu.edu/environmental.services/wastelabels.shtml) or from Environmental Services (x81450).
- 5.3 **Used Batteries** – Containers must have a label affixed with the words “Universal Waste - Used Batteries” and must have the date marked on the label from the day the first battery was placed in the container. These labels are available on Environmental Services website [www.nyu.edu/environmental.services/wastelabels.shtml](http://www.nyu.edu/environmental.services/wastelabels.shtml) or from Environmental Services (x81450).

## 6.0 PERSONAL PROTECTION EQUIPMENT

- 6.1 When handling used light tubes, and large lead-acid batteries, it is good practice to wear gloves, and eye protection. Please refer to Policy No. 112 – The Use and Selection of Personal Protection Equipment.