



Subject: **Construction & Renovation Waste Disposal Policy**

Policy No121

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 construction renovation waste; 2) ensure that human health and the environmental are protected; and 3) ensure the safe use, storage and disposal of construction renovation waste.

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, recycling or disposal of these wastes.

1.0 RESPONSIBILITIES

- 1.1 The Senior Director of Environmental Services or designee is responsible for:
 - 1.1.1 developing the Construction Renovation Waste 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 construction renovation 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 construction renovation receive information about this Policy; and
 - 1.2.2 ensuring that construction renovation waste is collected in appropriate containers, stored and labeled properly, and removed on a regular basis.
- 1.3 Employees who work with construction renovation waste are responsible for:
 - 1.3.1 being familiar with the hazards of construction renovation waste;
 - 1.3.2 collecting, storing, and labeling construction renovation waste in accordance with this Policy; and
 - 1.3.3 notifying their supervisors of any exposures, spills or any other pertinent problems.

ISSUE DATE	REPLACES	ORIGINATOR	APPROVAL
11/05	08/02	ENVIRONMENTAL HEALTH & SAFETY	SR, VP OPERATIONS AND ADMINISTRATION

2.0 DEFINITIONS

2.1 For the purpose of this policy, construction renovation waste is hazardous waste that is either left behind prior to renovation or is produced due to renovation of an area. Most common wastes to look for are:

- 1) **Abandoned Hazardous Chemicals** – any chemicals still present in the labs must be removed to the University's hazardous waste storage area for disposal through the University's hazardous waste contractor.
- 2) **Thermostats**, which can contain as much as 3 grams of liquid mercury (mercury switch) and are located in almost any building, including commercial, industrial, agricultural, community, and household buildings. Thermostats that do contain a mercury switch will be managed as Universal Waste and brought to the University's hazardous waste storage area for disposal through the University's hazardous waste contractor.
- 3) **Lamps**, which typically contain mercury and sometimes lead, and are found in businesses and households. Examples of common types of lamps include fluorescent, compact fluorescent light (CFL), high intensity discharge (HID), neon, mercury vapor, high-pressure sodium, and metal halide lamps.
- 4) **PCB Ballasts** – Most older fluorescent light ballasts have small capacitors that contain high concentrations of PCBs (polychlorinated biphenyls). These capacitors or ballasts are managed as hazardous waste and will be collected and brought to the University's hazardous waste storage area for disposal through the University's hazardous waste contractor.
- 5) **Sink Traps** – Prior to the removal of laboratory sink traps, a hazard assessment will be performed to determine whether or not the materials they contain are hazardous. If they are determined to be hazardous, they will be brought to the University's hazardous waste storage area for disposal through the University's hazardous waste contractor.
- 6) **Lead Pipe/Components of Old Equipment** – Lead components will be removed from old equipment such as the removal of lead piping and will be brought to the University's hazardous waste storage area for disposal through the University's hazardous waste contractor.
- 7) **Asbestos-Containing Material (ACM)** – Prior to any renovation work, all ACM will be removed by licensed asbestos abatement contractors, in accordance with all applicable federal, state and local regulations. All ACM waste will be disposed of by the University's asbestos waste contractor.

- 8) **Abandoned Electronic Equipment** – Electronic equipment such as computer monitors contain lead, which is considered a hazardous waste. Upon finding abandoned electronic equipment call the Building Manager. Old or abandoned electronic equipment will be collected and removed by the University's approved electronic equipment recycling contractor.

3.0 **WASTE COLLECTION/WASTE DISPOSAL**

- 3.1 **Hazardous Chemicals** – check to make sure containers are in good condition, are leak-proof and capable of being sealed tightly. A hazardous waste label must be completely filled out and affixed to the outside of the container. Please refer to the Hazardous Waste Minimization and Disposal Program Policy No. 101 for more details on disposal and labeling.
- 3.2 **Old Mercury-Containing Thermostats** are 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 the Universal Waste Minimization and Disposal Policy No. 120. If the mercury switch should break, it will then be managed as hazardous waste. Please refer to Mercury Safety Policy No. 102.
- 3.2 **Used Fluorescent Light Tubes** are considered universal waste. Also included are compact fluorescent lights (CFL), 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, which 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 of the Universal Waste Minimization and Disposal Policy No. 120. For disposal of broken fluorescent light tubes please refer to the Mercury Safety Policy No. 102.
- 3.3 **PCB Ballasts** – Most older fluorescent light ballasts have small capacitors that contain high concentrations of PCBs (polychlorinated biphenyls). These capacitors or ballasts are managed as hazardous waste. Please refer to the Hazardous Waste Minimization and Disposal Program Policy No. 101 section 11.7.
- 3.4 **Other** – If there is a suspicion of a hazardous component prior to renovation or construction (i.e., lead based paint, etc.) please call Environmental Services (ext. 81450) for clarification and/or analysis.

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TYPE OF WASTE	TYPE OF LABEL	HAZARDOUS COMPONENT
Hazardous Chemicals	Hazardous Waste Label	Many
Thermostats/Switches	Universal Waste Label	Mercury
Lamps	Universal Waste Label	Mercury
PCB Ballasts	Hazardous Waste Label	PCBs
Sink Traps	*Hazardous Waste Label	Many
Lead Pipe/Components of Old Equipment	Hazardous Waste Label	Lead
Asbestos-Containing Material (ACM)	Hazardous Waste Label	Asbestos
Electronic Equipment	None	Lead

*Depending on analytical results may be hazardous.

Please call Environmental Services (x81450) for labels.