



# Regulated Waste Management Plan

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Maintained online by the Environmental Health & Safety Committee

## Section 1: Introduction

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### 1.1 Purpose

The Regulated Waste Management Plan was implemented to designate administrative and handling procedures to minimize (1) The possibility of employee, student and public exposures to a waste hazard; and, (2) Release of various categories of regulated waste into the environment. This Plan describes all requirements relative to regulated waste generated onsite by Wilkes, including identification of all waste streams, proper handling, labeling, containers, recordkeeping, storage practices, employee training and disposal procedures.

### 1.2 Scope

The scope of this Plan extends to all campus departments that may generate, handle, store or facilitate transport/disposal of the below regulated waste categories, including hazardous waste, universal waste, used oil and Regulated Medical Waste, as designated below:

- **SECTION 3- Hazardous Waste:** Hazardous wastes, also referred to as chemical wastes, are defined under two (x2) categories: (1) solid wastes that are listed as hazardous by the US EPA and/or PA DEP; and, (2) solid wastes which exhibit one of four hazardous characteristics (ignitibility, corrosivity, reactivity, and toxicity).
- **SECTION 4- Universal Waste:** Universal Wastes are defined as hazardous wastes that are widespread, found in medium to large quantities, be easily managed and exhibit a relatively low risk to human health and/or the environment. The Universal Wastes covered under this Plan are: Light Tubes (lamps); Batteries; Mercury Thermometers; and Mercury-Containing Devices.
- **SECTION 5- Used Oil:** Used oil, such as waste motor oil, lubricating oil, and hydraulic oil, is not defined as a hazardous waste unless it is contaminated with another chemical. Used Oil and Used Oil Filters may be managed in accordance with the guidelines designated in Section V of this Plan.
- **SECTION 6- Regulated Medical Waste:** Regulated Medical (Biohazard) waste includes Regulated Medical Waste, such as waste streams generated through the Health Services and Athletics Department, in addition to some Science laboratory operations and custodial cleanup activities. The procedures listed in the section are supplemental to the requirements for Bloodborne Pathogens covered under the Wilkes University Exposure Control Plan.

### 1.3 Regulations

This Plan was developed to comply with the following federal and state regulations applicable to hazardous waste management: activities established by the U.S. Environmental Protection Agency (US EPA) in 40 CFR 260-279 and the Resource Conservation and Recovery Act (RCRA), and the Pennsylvania Department of Environmental Protection (PA DEP) in 25 PA Code Chapter 260-265, where applicable.

*U.S. Environmental Protection Agency (EPA)*

- Hazardous Waste Management {40 CFR 260-279}

Pennsylvania Department of Environmental Protection (PA DEP)

- Hazardous Waste Management System {25 PA Code Chapters 260-265}

U.S. Department of Transportation (DOT)

- Hazardous Materials Regulations {49 CFR Part 172}

## **Section 2: Plan Administration**

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### **2.1 Roles and Responsibilities**

<b>Environmental Health and Safety Committee*</b>	<ul style="list-style-type: none"> <li>➤ Plan review and needs assessment</li> <li>➤ Assist in training of designated staff</li> <li>➤ Site compliance reviews</li> <li>➤ Verify generator status</li> <li>➤ Facilitate testing of new waste streams</li> </ul>
<b>Chief Risk and Compliance Officer</b>	<ul style="list-style-type: none"> <li>➤ Recordkeeping</li> <li>➤ Plan implementation</li> <li>➤ Facilitate biohazard waste pickup events</li> </ul>
<b>Chemical Hygiene Officer</b>	<ul style="list-style-type: none"> <li>➤ Facilitate hazardous waste pickup events</li> <li>➤ Review pickup events and sign manifests</li> </ul>
<b>Facilities Manager</b>	<ul style="list-style-type: none"> <li>➤ Facilitate used oil and universal waste pickup events</li> <li>➤ Review pickup events and sign manifests</li> <li>➤ Submit records of pickup events</li> </ul>
<b>Hazardous Waste Stream Generators</b> <ol style="list-style-type: none"> <li>1. Facilities</li> <li>2. Science Departments</li> <li>3. Art Departments</li> <li>4. Theater Departments</li> </ol>	<ul style="list-style-type: none"> <li>➤ Identify hazardous waste streams</li> <li>➤ Facilitate training of staff</li> <li>➤ Ensure implementation of work practices</li> <li>➤ Verify labeling of storage containers</li> <li>➤ Coordinate pickup and submit records</li> </ul>
<b>Universal Waste/Used Oil Generators</b> <ol style="list-style-type: none"> <li>1. Facilities</li> <li>2. Science Departments</li> </ol>	<ul style="list-style-type: none"> <li>➤ Identify universal waste streams</li> <li>➤ Facilitate training of staff</li> <li>➤ Ensure implementation of work practices</li> <li>➤ Verify labeling of storage containers</li> <li>➤ Coordinate pickup and submit records</li> </ul>
<b>Biohazardous Waste Stream Generators</b> <ol style="list-style-type: none"> <li>1. Health Services</li> <li>2. Athletics</li> <li>3. Science Departments</li> <li>4. Facilities Department</li> </ol>	<ul style="list-style-type: none"> <li>➤ Identify biohazardous waste streams</li> <li>➤ Facilitate training of staff</li> <li>➤ Ensure implementation of work practices</li> <li>➤ Verify labeling of storage containers</li> <li>➤ Coordinate pickup and submit records</li> </ul>

\*Including the Laboratory Safety Subcommittee

## 2.2 Recordkeeping

The following records shall be maintained under this Policy:

Records	Department	Length
Waste Manifests	Risk and Compliance	Hard Copy: Min. 3 years from disposal date. Electronic Copy: Indefinitely
Training	Risk and Compliance	Maintained indefinitely in the Wilkes electronic training database.
Waste Classification Tests	Risk and Compliance	Min. 3 years from last disposal date for material.

## 2.3 Training

**Waste Handlers:** Identified waste handlers shall be provided with awareness training incorporated with other required training programs such as Laboratory Safety or Hazard Communications. Training topics include: Hazards of handled waste streams; Control measures and safe handling practices; and, Contingency planning/response measures.

**DOT Manifest Individuals:** Individuals that may affect the shipment of a hazardous waste shall be provided with DOT Training on a triennial basis. DOT Training shall include the requirements specified in 49 CFR 172.

## 2.4 Plan Review

This Plan shall be reviewed on an annual basis by the Environmental Health and Safety Committee in consult with the Environmental Health and Safety Liaison. Additional reviews and/or updates may be warranted based on inventory changes, incident reviews or modifications to regulatory/industry guidelines.

## Section 3: Hazardous Waste

### 3.1 Generator Status

This Plan applies to Wilkes University's Wilkes-Barre, Pennsylvania campus due to the onsite generation, storage, accumulation and shipment of hazardous wastes at the facility. Per 40 CFR 261.5(c) and (d), and 262.10(b), Wilkes is classified as a Small Quantity Generator of hazardous waste due to the generation of between 100 kilograms (220 pounds) and 1,000 kilograms (2,200 pounds) of a hazardous waste in a calendar month. As such, all hazardous waste management practices identified in this plan were developed in accordance with the requirements for Small Quantity Generators (SQG) of hazardous waste.

Name	Monthly Limits
Conditionally Exempt Small Quantity Generator (CESQG)	<220 pounds (<2.2 acute)
Small Quantity Generator (SQG)	220-2,200 pounds (<220 pounds acute)
Large Quantity Generator (LQG)	≥2,200 pounds (≥220 pounds acute)

The EPA Generator ID Number is: **PAD987266681**.

### 3.2 Hazardous Waste Determinations

As a part of this plan, all solid wastes generated by Wilkes will be classified as either hazardous or non-hazardous. Under 40 CFR Part 261, hazardous wastes are defined under two (x2) categories: (1) solid wastes that are listed as hazardous by the EPA and/or PA DEP; and (2) solid wastes which exhibit one of four hazardous characteristics (ignitibility, corrosivity, reactivity, and toxicity). Wilkes shall conduct hazardous waste determinations on all waste streams identified in this plan, either by process knowledge (SDS) or testing by EPA approved methods.

Listed Wastes	
<b>Non-Specific Source Waste (F-List)</b>	F-List wastes are determined by the EPA to be hazardous but not generated by a particular industry or manufacturing process.
<b>Specific Source Waste (K-List)</b>	K-List wastes are determined by the EPA to be hazardous and are generated by specifically identified industries.
<b>Commercial Chemical Products (P/U-Lists)</b>	These wastes are defined by the EPA as discarded or intended to be discarded commercial chemical products, off-specification commercial chemical products, manufacturing chemical intermediates and their container residues/spills having generic names on the P and U Lists. Materials on the P-List are defined as acutely-hazardous wastes and materials on the U-List are defined as toxic wastes.

<b>Characteristic Wastes</b>	
<b>Ignitibility</b>	Ignitibility is the ability of wastes to catch fire under certain conditions and meets designated properties established by the EPA.
<b>Toxicity</b>	Toxic wastes are harmful or fatal when ingested or absorbed, or have the ability to leach toxic chemicals into the environment. Examples include wastes that contain high concentrations of specific toxicants as identified by EPA-defined test procedures.
<b>Corrosivity</b>	Wastes defined as corrosive demonstrate a pH less than or equal to 2 or greater than or equal to 12.5; or have the ability to corrode metals.
<b>Reactivity</b>	Wastes defined as reactive demonstrate certain properties designated by the EPA, including unstable wastes that readily undergo violent change without defonation; React violently with water; Have the ability to generate potentially explosive mixtures with water; When mixed with water, the material can form toxic fumes, gases and vapors; Is classified as an explosive by DOT; etc.

### 3.3 Handling and Storage of Hazardous Waste

<b>General</b>	<ul style="list-style-type: none"> <li>➤ Once a material is identified as a hazardous waste, it will be handled in accordance with this Plan.</li> <li>➤ Wilkes shall not dispose of or recycle hazardous wastes with municipal waste, incinerate or evaporate hazardous wastes, or dispose of hazardous wastes on land.</li> <li>➤ Wilkes shall not dispose of hazardous wastes into the municipal sewer (i.e. into sinks and drains) without following proper dilution and neutralization procedures identified in the Laboratory Chemical Hygiene Plan.</li> </ul>
<b>Accumulation Limits</b>	<ul style="list-style-type: none"> <li>➤ Wilkes shall accumulate hazardous waste onsite for 180 days or less, thereby meeting the requirements established for SQG of hazardous waste.</li> <li>➤ Offsite shipments to Treatment, Storage and Disposal Facilities (TSDF) are regularly scheduled by Wilkes on a biannual basis.</li> <li>➤ Wilkes shall not exceed the 100 kilogram accumulation threshold maintaining its generator status as a CESQG.</li> </ul>
<b>Containers</b>	<ul style="list-style-type: none"> <li>➤ Hazardous waste containers are sealed except when adding or transferring waste. If a container cannot be sealed, they will be placed into an overpack container.</li> <li>➤ Containers are to be compatible to the material they contain. All containers are segregated from incompatible wastes based on the EPA Chemical Compatibility Chart or equivalent (Appendix A).</li> <li>➤ Containers are maintained in good condition. Containers are inspected periodically for leaks, spills and degradation to prevent a release of hazardous wastes. If containers are determined to be in poor condition, the waste is transferred to a new container.</li> <li>➤ Containers are not stored in a manner that will jeopardize the integrity of the container (i.e. containers will not be stored near ledges or devices that may cause rupture).</li> <li>➤ Flammable hazardous wastes are stored in rated flammable storage cabinets to prevent accidental ignition.</li> </ul>

<p style="text-align: center;"><b>Labels</b></p>	<ul style="list-style-type: none"> <li>➤ Labels are placed on the container so that any original labels are not concealed.</li> <li>➤ All hazardous waste containers are labeled appropriately as the materials are designated as a hazardous waste. All labels are maintained in a visible and legible condition and include the following: <ul style="list-style-type: none"> <li>○ The date of initial accumulation</li> <li>○ A label indicating the phrase "Hazardous Waste"</li> <li>○ The person generating the waste's contact information</li> <li>○ A description of the waste (this can include the manufacturer's label, trade name, hazard class, etc.).</li> </ul> </li> </ul>
<p style="text-align: center;"><b>Container Reuse</b></p>	<p>All containers previously used for hazardous waste must meet the definition of RCRA-Empty prior to reuse or disposal as municipal waste. The container is considered empty when all contents have been removed by pouring, pumping or aspirating and if the following apply (<i>employees who handle paint and aerosol containers are instructed to follow these procedures</i>):</p> <ul style="list-style-type: none"> <li>○ The inner lining and bottom of the container have no more than one inch of residue.</li> <li>○ For 100-gallon or less containers, no more than 3% of the total capacity of the container remains.</li> <li>○ For containers over 100-gallons, no more than 0.3% of the container's total capacity remains.</li> </ul> <p>For P-Listed wastes, the container is not considered empty until it has been triple-rinsed using an appropriate solvent. All rinsate from this process must be collected and managed as a hazardous waste.</p>
<p style="text-align: center;"><b>Storage Areas</b></p>	<p>Under hazardous waste accumulation requirements in 40 CFR 262.34, hazardous wastes can be accumulated at or near the initial point of generation, referred to as the Satellite Accumulation Area (SAA).</p> <ul style="list-style-type: none"> <li>➤ A maximum of 55-gallons of hazardous wastes are accumulated in containers within the SAA.</li> <li>➤ Hazardous wastes located within a SAA are transferred to the Central Storage Area within one (1) year.</li> <li>➤ Each SAA is under direct control of an individual trained in proper management of SAAs.</li> <li>➤ Waste storage areas shall not be located in the following areas: <ul style="list-style-type: none"> <li>○ Close proximity to sinks and or drains.</li> <li>○ Behind doors or windows, aisles or other means of egress.</li> </ul> </li> <li>➤ All SAAs will be designed to maintain sufficient aisle space to allow the unobstructed movement of personnel and emergency equipment throughout the work area.</li> <li>➤ The room containing the SAA will be equipped with the following: <ul style="list-style-type: none"> <li>○ A telephone</li> <li>○ Portable fire extinguishers</li> <li>○ Appropriate signage</li> </ul> </li> <li>➤ Each SAA is designed to contain hazards present (i.e. equipped with flammable storage cabinets where flammables are stored).</li> </ul>

### **3.4 Hazardous Waste Disposal**

Wilkes shall schedule off-site shipment of hazardous wastes on a biannual basis with an appropriately-licensed hazardous waste hauler. All hazardous wastes are transported to a TSDF that is authorized/permited/registered to manage hazardous wastes by a state with an approved RCRA program. Prior to shipment, DOT-trained Wilkes personnel shall ensure that all wastes are properly packaged, labeled, marked and placarded in accordance with DOT regulations identified in 49 CFR Parts 172 to 179 before shipment.

Additionally, this individual shall verify that appropriate sections of the Manifest are completed for the shipment. This individual and the hazardous waste transporter must sign and date a copy of the manifest before leaving campus. This copy is maintained by Wilkes until the completed manifest is received (signed and dated) by the TSDF within thirty (30) days. A hard copy of the completed manifest shall be maintained by Wilkes for a minimum period of three (3) years from the date of shipment. Electronic copies shall be maintained indefinitely.

In the event the fully executed manifest is not received within 45 days, the waste hauler vendor shall be contacted for information on the shipment. In the event the manifest is not received within 60 days, Wilkes is required to send a copy of the original manifest to the EPA Regional Administrator with a note indicating that they have not received a return copy.

### **3.5 Emergency Situations**

Upon identification of a chemical release, the following procedures are to be implemented:

- For incidental spills of chemicals, a trained individual may clean under requirements specified by the Chemical Hygiene Plan.
- For larger spills, the area(s) shall be evacuated and the incident is to be reported to the Chemical Hygiene Officer and Public Safety.
- Only individuals trained in the particular chemical and who are properly equipped shall respond to incidents involving hazardous waste releases.
- At the conclusion of each event, the Department shall work with the Environmental Health and Safety Committee to investigate the incident to identify direct and root causes as well as any corrective measures.



## Section 4: Universal Waste

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### 4.1 Universal Waste Generator Status

In accordance with the generator classifications, identified by EPA/PA DEP, Wilkes is designated as a Small Quantity Handler of Universal Waste (SQHUW) due the on-site accumulation of not more than 5,000 kilograms (11,000 pounds) of one or more types of universal wastes at any time. This Program was developed in accordance with the requirements for small quantity handlers of universal waste.

If Wilkes must be reclassified as a Large Quantity Handler of Universal Waste (LQHUW), the PA DEP must be notified prior to accumulating more than 5,000 kilograms of universal waste. Notification, if applicable, will include the following information:

- Name and Mailing Address;
- The Name and Phone Number of an on-site person who should be contacted regarding universal waste management activities;
- The Address and/or Physical Location of universal waste management activities;
- A list of all universal wastes that Marywood University handles; and
- A statement indicating that Marywood University will accumulate more than 5,000 kilograms of universal waste at one time.

Wilkes is not a Universal Waste Transporter or Destination Facility.

### 4.2 General Procedures

As a SQHUW, Wilkes shall adhere to the following general management practices for all types of universal wastes:


- Diluting, treating or disposing of universal waste is prohibited.
- If universal waste must be maintained in a container, the container shall be:
  - closed at all times (except when adding or removing waste);
  - compatible with the universal waste it contains;
  - structurally sound and free of damage that may lead to leaking, spilling or release of contained material;
- Universal waste shall not be stored outside. If storage of universal waste outside becomes a necessity, all exterior storage areas will be covered to preclude precipitation from coming into contact with waste and waste containers.
- Universal wastes shall be handled in accordance with specified guidelines for each type of waste as identified within Section 4.3-4.6 of this Plan.
- Universal wastes shall be accumulated onsite for up to one (1) year from the date the material is taken out of service. In order to document the amount of time that a universal waste has been accumulating, one or more of the following methods shall be implemented:
  - The universal waste is placed in a container and labeled with the earliest date that any material in the container became a waste.
  - Each individual item of universal waste within a container is directly labeled with the date it became a waste.
  - A designated accumulation area is labeled with the earliest date that waste began accumulating in that area.

- An inventory system that identifies the date that each material became a waste.
- Maintaining an inventory system that identifies the earliest date that a material became a waste within a designated accumulation area.

### 4.3 Batteries

Batteries are defined as a device containing one or more electrically connected electrochemical cells that is designed to receive, store and deliver electric energy. The electrochemical cells contain an anode, cathode and an electrolyte, in addition to connections. The term battery can also include an intact, unbroken battery from which the electrolyte has been removed.

The following management activities are implemented provided the individual casings are not breached, are intact and closed (except while removing the electrolyte):

<b>Designation</b>	A battery becomes a universal waste on the date it is removed from service; either because it no longer operates or because it is no longer needed.	
<b>Handling</b>	<ul style="list-style-type: none"> <li>➤ Store batteries by type in a closed plastic container.</li> <li>➤ Remove the electric charge of the battery by discharging</li> <li>➤ Disassemble batteries or battery packs into individual batteries or cells</li> <li>➤ Remove batteries from associated products</li> <li>➤ Remove the electrolyte from batteries. Cells are to be closed immediately after the electrolyte is removed.</li> </ul>	
<b>Labeling</b>	<p>Options for labeling include:</p> <ul style="list-style-type: none"> <li>➤ "Universal Waste- Battery(ies)"</li> <li>➤ "Waste Battery(ies)"</li> <li>➤ "Used Battery(ies)"</li> </ul> <p>The responsible individual and start accumulation date shall be listed on the label.</p>	
<b>Recycling</b>	Used batteries shall be recycled through a qualified vendor. Documentation from all pickup events shall be forwarded to the EHS Office for recordkeeping.	
<b>Releases</b>	In the event a battery casing leaks, a trained and properly protected individual shall place the casing into a safe, sealed container. If the release exceeds 1 gallon of fluid, the area shall be secured and the release cleaned by the EHS Contractor.	


**Exceptions:** Batteries that are not covered under 40 CFR 273 or 25 PA Code 266b include spent lead-acid batteries that are being reclaimed. Management practices for spent lead-acid batteries allow for the universal waste standards identified above to be followed. If spent lead-acid batteries are being reclaimed or regenerated, management practices must be conducted in accordance with 40 CFR 266, Subpart G and 25 PA Code 266a, Subchapter G.

Wilkes University does not reclaim or regenerate lead-acid batteries and will continue to manage these materials under the universal waste standards.

#### 4.4 Light Tubes/Lamps

Wilkes University shall maintain discarded lamps as a universal waste. Per 40CFR 273.9 and 25 PA Code 266b.3, a lamp is defined as a bulb or tube portion of an electric lighting device specifically designed to produce radiant energy (ultraviolet, visible, etc.).

Once these lamps become a waste on the date they are removed from service, they are handled to prevent breaking, leaking or any additional damage. The following management activities are implemented provided the individual unit is not damaged:


<b>Designation</b>	Each lamp unit shall be designated as a universal waste once it is removed from service.
<b>Handling</b>	<ul style="list-style-type: none"> <li>➤ Lamps are stored in structurally sound, closed containers.               <ul style="list-style-type: none"> <li>○ e.g. cardboard boxes with fitted supports</li> </ul> </li> <li>➤ Containers shall be periodically inspected for leaks, spills or potential damage that could cause the release of any hazardous substance (mercury, cadmium).</li> </ul>
<b>Labeling</b>	<p>Options for labeling include:</p> <ul style="list-style-type: none"> <li>➤ <b>“Universal Waste- Lamp(s)”</b></li> <li>➤ <b>“Waste Lamp(s)”</b></li> <li>➤ <b>“Used Lamps(s)”</b></li> </ul> <p>The responsible individual and start accumulation date shall be listed on the label.</p> 
<b>Recycling</b>	Used lamps shall be recycled through a PA DEP-approved recycling firm. A list of these firms is found on the PA DEP website. Documentation from all pickup events shall be forwarded to the EHS Office for recordkeeping.
<b>Broken Lamps</b>	If lamps are unintentionally broken, the area shall be ventilated for a minimum of 30 minutes and the lamp/associated residue cleaned by appropriately trained personnel. The lamp, residue and clean-up materials continue to be managed as universal waste.

The use of newer lamps with lower levels of mercury (thus are not hazardous waste) shall be investigated. If the lamps pass the TCLP they are not hazardous waste and may be disposed in a municipal waste landfill.

#### 4.5 Mercury-Containing Thermostats and Other Devices

Mercury-containing devices that may be on campus include thermostats, barometers, relays and switches. Per 40CFR 273.9 and 25 PA Code 266b.3, a mercury thermostat is a temperature control

device that contains metallic mercury in an ampule attached to a bimetal sensing element. This also includes mercury-containing ampules that have been removed from these devices in accordance with federal requirements. As with thermostats, ampules containing mercury are removed from these devices in compliance with this program:

<b>Designation</b>	The device shall be designated as a universal waste once it is removed from service.
<b>Handling</b>	<p><b>Ampule removal</b></p> <ul style="list-style-type: none"> <li>➤ The mercury-containing ampule shall be removed such that breakage will not occur.</li> <li>➤ The ampule will be removed in or over a containment device.</li> <li>➤ A mercury clean-up system will be readily available and any released mercury will be transferred to an acceptable container.</li> <li>➤ Removal will occur in a well ventilated area and monitored to ensure compliance with Occupation Safety and Health Administration (OSHA) exposure levels for mercury</li> <li>➤ Only employees trained in proper waste mercury-handling and emergency procedures will conduct removal.</li> </ul> <p><b>Storage</b></p> <ul style="list-style-type: none"> <li>➤ Removed ampules will be stored in closed, non-leaking containers and maintained in good condition.</li> <li>➤ Removed ampules will be packed in a container with packing materials adequate to prevent breakage during storage, handling and transport.</li> </ul>
<b>Labeling</b>	<p>Options for labeling include:</p> <ul style="list-style-type: none"> <li>• <b>“Universal Waste- Mercury-Containing Device(s)”</b></li> <li>• <b>“Waste Mercury-Containing Device(s)”</b></li> <li>• <b>“Used Mercury-Containing Device(s)”</b></li> </ul> <p style="text-align: center;">-or-</p> <ul style="list-style-type: none"> <li>• <b>“Universal Waste- Mercury-Thermostat(s)”</b></li> <li>• <b>“Waste Mercury- Thermostat (s)”</b></li> <li>• <b>“Used Mercury- Thermostat Device(s)”</b></li> </ul> <div data-bbox="1198 1115 1425 1339" style="float: right; border: 1px solid black; padding: 5px;">  <p>The image shows a purple rectangular label template. At the top, it says 'UNIVERSAL WASTE' in large white letters. Below that, on the right side, it says 'USED MERCURY DEVICE' in smaller white letters. On the left side, there are four white rectangular boxes for 'SHIPPER', 'ADDRESS', 'CITY, STATE, ZIP', and 'ACCUMULATION START DATE'.</p> </div> <p>The responsible individual and start accumulation date shall be listed on the label.</p>
<b>Recycling</b>	Mercury-containing devices shall be recycled through a qualified vendor. Thermostats may be recycled through the PA DEP Collection Program. Documentation from all pickup events shall be forwarded to the EHS Office for recordkeeping.
<b>Releases</b>	<p>In the event of a broken mercury reservoir, the following shall be implemented:</p> <ul style="list-style-type: none"> <li>➤ Open windows and evacuate room occupants</li> <li>➤ Turn off HVAC system for the room</li> <li>➤ Notify the EHS Contractor for proper cleanup using available spill kits</li> <li>➤ EHS may conduct air monitoring to confirm cleanup is complete</li> </ul>

## Section 5: Used Oil and Filters

### 5.1 Overview of Used Oil

Used oil managed under this program includes oil generated from vehicle and equipment maintenance, including hydraulic and lubricating products. These products are not typically mixed with other industrial contaminants that would preclude it from being managed as a Universal Waste.

### 5.2 General Procedures

Used oil included under the scope of this Plan shall be managed in accordance with the following:

<p><b>Handling</b></p>	<ul style="list-style-type: none"> <li>➤ Used oil is stored in proper containers appropriate for holding petroleum-based product and adequately labeled ("Used Oil").</li> <li>➤ All transfer of product to the storage container shall be performed by trained individuals using accepted practices to minimize product release. Use funnels and other transfer equipment when possible.</li> <li>➤ Used oil shall not be disposed of in municipal waste containers, mixed with other wastes or discharged into an environmental medium (drains, water, land).</li> <li>➤ Cleanup any incidental spills of product. Report any spills involving more than 5 gallons of product.</li> </ul>
<p><b>Recycling/ Disposal</b></p>	<p>All used oil generated by Wilkes University is recycled through a qualified reclamation company. For each collection event:</p> <ul style="list-style-type: none"> <li>➤ Ensure proper collection procedures are implemented by the vendor and spill control equipment is readily available.</li> <li>➤ Confirm the amount collected with the vendor.</li> <li>➤ Maintain a receipt from the collection event for recordkeeping.</li> </ul>
<p><b>Filters</b></p>	<p>Used filters are managed as recyclable scrap metal and collected by the reclamation contractor. In order to prevent leakage, used oil filters are drained of all oil prior to recycling. Drained oil is captured and recycled as identified above. Wilkes University has identified a proper protocol for draining oil filters as follows:</p> <ul style="list-style-type: none"> <li>➤ After a hole is punctured in the dome of the filter, the filter is turned upside down over a drip pan or other collection basin for a minimum of 12 hours at room temperature (60°F) to ensure all residual oil is drained.</li> <li>➤ A funnel is utilized to transfer used oil from the drip pan into the waste oil container for collection by the reclamation contractor.</li> <li>➤ Remaining oil from the drip pan and the filter will not be rinsed down drains or sinks.</li> </ul>

## Section 6: Regulated Medical Waste

### 6.1 Overview of Regulated Medical Waste

The types of Regulated Medical Waste that may be generated by Wilkes include:


1. Human blood and blood products (including contaminated materials)
2. Certain animal wastes
3. Used sharps

Additionally, this category shall include non-RCRA, non-controlled hazardous drugs such as pharmaceutical products.

### 6.2 General Procedures

Regulated Medical Waste included under the scope of this Plan shall be managed in accordance with the following:

<p><b>Segregation</b></p>	<p><b>These materials may be stored in a Red Bag:</b></p> <ul style="list-style-type: none"> <li>➤ Visible bloody gloves or PPE.</li> <li>➤ Saturated gauze.</li> <li>➤ Closed disposable sharps containers.</li> <li>➤ Saturated bandages</li> <li>➤ Saturated medical treatment items.</li> </ul>	<p><b>Prohibited for Red Bags:</b></p> <ul style="list-style-type: none"> <li>➤ Loose sharps</li> <li>➤ Medication</li> <li>➤ Batteries</li> <li>➤ Hazardous Waste/Chemicals</li> <li>➤ Cylinders</li> <li>➤ Regular garbage</li> </ul>
<p><b>Container Storage</b></p>	<ul style="list-style-type: none"> <li>➤ Store in an interior area protected from environmental elements including heat and moisture.</li> <li>➤ The area shall be secured to prevent unauthorized access.</li> <li>➤ Waste shall not be commingled with other waste (hazardous waste, universal waste) covered under this plan.</li> </ul>	
<p><b>Containers</b></p>	<ul style="list-style-type: none"> <li>➤ Seal containers by engaging autolocks or sealing cardboard boxes with tape.</li> <li>➤ Line boxes or totes with industry Red Bags.</li> <li>➤ When full, tie bags, engage autolocks, tape box shut, or close sharps container.</li> <li>➤ Ensure weight limit for container is not exceeded.</li> <li>➤ Ensure red bag liner is completely enclosed in container.</li> </ul>	
<p><b>Sharps Containers</b></p>	<ul style="list-style-type: none"> <li>➤ Use dedicated sharps container for all needles, syringes, broken glass, scalpels, culture slides, etc.</li> <li>➤ Ensure containers are properly closed when full and prepared for pickup.</li> <li>➤ Place into the secondary shipping container.</li> </ul>	
<p><b>Accumulation Limits</b></p>	<ul style="list-style-type: none"> <li>➤ When stored at room temperature, RMW may not be stored longer than 30 days.</li> <li>➤ When frozen, RMW shall not be stored longer than 90 days.</li> <li>➤ Sharps containers may be stored until full.</li> <li>➤ The contracted licensed transporter shall schedule RMW pickup events accordingly.</li> </ul>	

<p><b>Shipping Container Labeling</b></p>	<ul style="list-style-type: none"> <li>➤ Wilkes University- 84 W South St, Wilkes-Barre, PA 18701; (570) 408-2000</li> <li>➤ Date the waste was generated.</li> <li>➤ Name of the transporter and license number.</li> <li>➤ The words "infectious waste" or "chemotherapeutic waste".</li> <li>➤ The word "biohazard" and the universal biohazard symbol.</li> </ul> 
<p><b>Shipping Manifest</b></p>	<ul style="list-style-type: none"> <li>➤ The licensed hauler shall provide a manifest documenting the transport and disposal.</li> <li>➤ Prior to the RMW leaving campus, a DOT-trained individual shall review the waste pickup and sign the manifest.</li> <li>➤ Ensure the final copy of the manifest is received from the destination facility within 30 days.</li> </ul>
<p><b>Recordkeeping</b></p>	<ul style="list-style-type: none"> <li>➤ Manifest copies, including the initial copy and/or the final copy signed by the destination facility, shall be maintained by the Chief Risk and Compliance Officer (hard copy for 5 years, electronic copy indefinitely).</li> </ul>

