

3.1.1

EMS Aspects: Building Maintenance and Repair, Facilities, Planning and Engineering, Hazardous and Universal Wastes

Aspect Ranking: 18

Building maintenance is provided by Maintenance and Operations, a department of Facilities, Planning and Engineering at The University of Texas Health Science Center at Houston (UTHSC-H). Their purpose is to provide preventative maintenance and repair mechanical, electrical, plumbing, and structural deficiencies on UTHSC-H buildings.

Hazardous and Universal Waste Management

Task/Activity Description:

Universal waste is a specific type of hazardous waste that is subject to 40 CFR part 273 which provides less restrictive standards for accumulation, recordkeeping and shipping requirements as compared with hazardous wastes designated under 40 CFR parts 261-265. These universal wastes include rechargeable batteries, pesticides, mercury containing articles and thermostats, spent fluorescent lamps, and paint and paint related wastes. Used oil is collected for recycling under 40 CFR part 279. Non-PCB ballasts are collected for recycling, and PCB ballasts are collected for disposal at a TSCA approved incinerator.

The Environmental Protection Program (EPP) is responsible for supplying containers for the storage and accumulation of hazardous, universal, and recyclable wastes. Additionally, the original container may be used for the collection and storage of wastes. These wastes are stored in the maintenance shops which serve as satellite accumulation area. The Environmental Protection Program collects universal and recyclable wastes and transports to central collection areas located at each building for offsite shipment for recycling or disposal.

Any RCRA hazardous wastes generated by Maintenance and Operations is collected in a compatible container, labeled, stored in the central accumulation area and removed by a hazardous waste disposal contractor.

Records of hazardous, universal, and recyclable wastes generated and disposed are kept by the EPP at 1851 Crosspoint Ave. This procedure is detailed in Guidance Document 3.1 Collection of Chemical Wastes. Hazardous and universal wastes managed for disposal or recycling are manifested from each UTHSC-H building, and invoices for recycling and disposal are paid by Facilities, Planning and Engineering.

Key Control Points:

Maintenance personnel utilize the Hazardous Waste Line to request pickups of hazardous materials for management through the EHS Environmental Protection Program.

The Environmental Protection Program reviews building maintenance waste management procedures during annual training and routine interactions and makes adjustments according to processes, equipment, or facility changes.

Related Forms, Records, SOPs:

- Guidance Document 3.1 Collection of Chemical Waste
- Chemlog

Personnel Responsible:

Building Maintenance Manager

- Ensure employees practice proper waste disposal procedures, operate equipment to ensure safety, and minimize environmental releases

Safety Specialists, EPP

- Assists with the collection of hazardous and universal wastes
- Provide training to building maintenance employees covering safety and hazardous waste identification and disposal

Safety Manager, EPP

- Ensure wastes from building maintenance activities are managed in a cost effective and environmentally compliant manner.
- Communicate environmental objectives to building maintenance manager

Director, EHS

- Provide program oversight and liaison with VP of Facilities, Planning and Engineering.

Environmental Compliance (Hazardous and Universal Wastes) Program

Task/Activity Description:

Grounds Survey, inclusive of Hazardous, Universal and Recyclable Waste

Schedule: Semiannual

To assist Maintenance and Operations employees in complying with the requirements for management of hazardous and universal wastes, The Environmental Health & Safety Department's Environmental Protection Program (EPP) conducts semiannual inspections of the facility grounds for storm water pollution prevention practices and hazardous and universal waste management.

Inspections are performed by the EPP safety manager or safety specialist utilizing a checklist survey form. Deficiencies are noted on the form by checking the "yes, no, or not applicable" boxes or by adding items to an additional comments section on the survey form. Once the survey is complete, a memo listing any noted deficiencies and corrective actions is sent to the building maintenance manager. The memo is also copied to the vice president of auxiliary enterprises, as well as filed by the EPP for future reference.

Deficiencies noted during the survey are tracked for resolution utilizing Environmental Health & Safety Assistant (EHSA). As part of the deficiency tracking process, at least thirty days are given to correct any deficiencies, before potentially escalating enforcement actions.

Key Control Points:

- Identify potential mismanagement of hazardous and universal wastes, improper storage and disposal, impacts to storm and waste water, impacts to public and personnel health
- Communicate environmental compliance requirements to personnel who generate hazardous and universal wastes

Related Forms, Records, SOPs:

- SWPP & Environmental Grounds Survey

Personnel Responsible:

Building Maintenance Manager

- Ensure wastes are labeled and stored properly
- Call EPP and request waste pickups

Safety Manager/Safety Specialists, EPP

- Perform facility survey
- Enter deficiencies into EHSA database and generate memo report
- Track appropriate response through EHSA.
- Monitor inspection schedule through the EPP compliance calendar
- Advise appropriate actions on the compliance process

Director, EHS

- Provides oversight and appropriate actions on the compliance process
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Annual Training – Environmental Management Systems and Environmental Awareness

Task/Activity Description:

For the communication of environmental programs and environmental management systems, the EPP provides training on an annual basis for Maintenance and Operations staff. This training introduces and reinforces environmental management system principles, waste management practices specific to maintenance, and environmental concerns and compliance requirements for storm water, air emissions, hazardous materials management, and spill prevention and countermeasures. The training is lead by an instructor on an annual basis, and the training materials are available on the EHS web page.

Key Control Points:

- Communicate environmental compliance requirements and environmental management concepts to personnel who provide preventative maintenance for UTHSC-H buildings.

Related Forms, Records, SOPs:

- [Environmental Awareness and Environmental Management Systems for Facility Personnel](#)

Personnel Responsible:

Building Maintenance Manager

- Ensure AE maintenance staff attend training

Manager/Safety Specialists, EPP

- Develop training materials and submit updates to for web page
- Present training materials
- Document training by obtaining a sign in sheet with all participants listed, deliver sign in sheet to EH&S administrative assistant who will enter names of personnel trained into a training data base

Director, EHS

- Provide management review

Routine management of hazardous and universal waste to meet regulations

Hazardous Waste Characterization (30 TAC 335.511)

The Environmental Protection Program uses existing knowledge about the maintenance process and materials to classify hazardous, universal, and recyclable wastes. Material safety data sheets, manufacturers' literature, and other documentation generated in conjunction with a particular process or item are used to demonstrate process knowledge.

Universal Waste (40 CFR 273, 30 TAC §335.261)

"Small Quantity Handler of Universal Waste" means a universal waste handler who does not accumulate at any time 5,000 kilograms or more total of universal waste calculated collectively. "Universal Waste" means any of the following hazardous wastes that are subject to the universal waste requirements to include batteries, pesticides, mercury containing articles and thermostats, paint and paint-related waste, and spent lamps.

Emergency Response for Hazardous Materials (40 CFR 262.34(d)(5))

Incidents reported to EHS are entered into an incident database. The database is built into the EMS to record incidents as they occur and allowing for tracking, documentation, follow-up, and corrective action. Employees handling hazardous and universal wastes are trained annually at an appropriate level on emergency response procedures.