

### 3.1.4

#### **EMS Aspects: Auxiliary Enterprises, Parking Services, Hazardous and Universal Wastes**

##### **Aspect Ranking: 14**

Auxiliary Enterprises' Parking Services, a separate business entity of the University of Texas Health Science Center-Houston (UTHSC-H) maintains the University Central Tower (UCT), New Student Housing (NSH), and University of Texas Professional Building (UTPB) parking garages.

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#### **Parking Services Environmental Releases (Hazardous and Universal Wastes)**

##### **Task/Activity Description:**

Parking Service main offices are located in the Student Recreation Center and support staff offices in each of the garages. The garages contain fluorescent lights, ballasts, and other maintenance chemicals and tools. Additionally, the UTPB and NSH garages have small diesel storage tanks for their generators.

Typical wastes generated by garages consist of used fluorescent lights and ballasts. The lamps are a type of hazardous waste termed Universal Wastes. These wastes are shipped to an off-site contractor by the Environmental Protection Program (EPP) for recycling. All used fluorescent lamps are placed in cardboard boxes which are also the transport container.

Used lamps are regulated by 30 TAC Chapter 335 Subchapter H §335.261, which applies to generators or handlers of the following universal hazardous wastes: batteries, pesticides, mercury, paint and paint-related, and lamps.

##### **Key Control Points:**

- Universal wastes are stored in compatible containers marked the words universal waste, the type of material, and the date full.
- Auxiliary Enterprise staff utilize the hazardous waste line to request pickups from the EPP.

##### **Related Forms, Records, SOPs:**

- 30 TAC Chapter 335 Subchapter H §335.261

**Personnel Responsible:**

Parking Services Director, AE

- Ensure employees practice proper waste disposal procedures
- Utilize hazardous waste line to request waste pickups

Safety Specialists, EPP

- Assists with the collection of universal and other hazardous wastes
- Maintain separate records of recycling/waste disposal activities from Parking Services
- Evaluate waste recycling activities to assure applicability with universal waste rules
- Provide training to Parking Service employees covering their specific waste disposal procedures

Safety Manager, EPP

- Ensure wastes from Parking Service activities are managed in a cost effective and environmentally compliant manner.
- Communicate environmental objectives to Parking Services Director

Director, EHS

- Provide program oversight and liaison with VP of Auxiliary Enterprises

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**Environmental Compliance (Parking Services) Program**

**Task/Activity Description:**

Grounds Survey, inclusive of universal wastes

Schedule: Semi -annual

To assist Parking Services maintenance staff in complying with the requirements for managing hazardous and universal wastes, The Environmental Health & Safety Department's EPP conducts semi-annual inspections of parking garages.

Inspections are performed by the EPP manager or safety specialist utilizing a checklist survey form. Deficiencies are noted on the form by checking the "Violation, Non-Violation, or N/A" 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 Parking Services Director. The memo is also copied to EPP's file for future reference.

Deficiencies noted during the survey are tracked for resolution utilizing Environmental Health and Safety Assistant (EHSA) database. 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 materials and improper storage and disposal
- Communicate environmental compliance requirements to personnel who maintain the garages and generate hazardous and universal wastes

**Related Forms, Records, SOPs:**

- 30 TAC Chapter 335 Subchapter H §335.261

**Personnel Responsible:**

Parking Services Director

- Correct any noted deficiencies during the EHS survey

Manager/Safety Specialists, EPP

- Perform grounds survey
- Enter deficiencies into database and generate memo report
- Track appropriate response through deficiency database
- 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 Spill Prevention Control Countermeasures (SPCC)/Facilities Waste training on an annual basis for facilities staff. This training introduces and reinforces environmental management system principles, air emission control practices, and environmental concerns and compliance requirements for hazardous materials management. The training is lead by an instructor on an annual basis. Additionally, the training materials are available on the EHS web page.

**Key Control Points:**

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- Communicate environmental compliance requirements and environmental management concepts to personnel who maintain garages used by Parking Services

### **Personnel Responsible:**

#### Parking Services Director

- Ensure employees attend training offered by EHS

#### Manager/Safety Specialists, EPP

- Develop training materials and submit updates for the web page
- Present training materials to facilities staff
- 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

#### EH&S Director

- Provide management review and liaison with VP of Auxiliary Enterprises

### **Routine Management of Hazardous 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 enter in incidents as they occur and allowing for tracking, documentation, follow-up, and corrective action. Employees handling hazardous waste are trained annually at an appropriate level on emergency response procedures.