

3.1.9

EMS Aspects: Student Housing Maintenance, Auxiliary Enterprises Hazardous and Universal Wastes

Aspect Ranking: 9

Auxiliary Enterprises (AE) is a division within University of Texas Health Science Center at Houston comprised of business entities which specialize in services for the student, faculty, employee and often the Texas Medical Center community.

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 student housing maintenance building which serves as the central accumulation area. The Environmental Protection Program collects universal and recyclable wastes and transports to central collection areas located at the Medical School Building (MSB), or the Operations Center Building (OCB) for offsite shipment and recovery.

Any RCRA hazardous wastes generated at student housing or at the recreation center are collected in a compatible container, labeled, stored in the central accumulation area and removed by a hazardous waste disposal contractor. All auxiliary enterprise business locations are conditionally exempt small quantity generators of hazardous wastes and small quantity handlers of universal wastes.

Records of hazardous, universal, and recyclable wastes generated and disposed are kept by the EPP at 18 51 Crosspoint Ave. This procedure is detailed in Guidance Document

3.1 Collection of Chemical Wastes. Waste managed for disposal or recycling is manifested from AE, and invoices for recycling and disposal are paid by AE.

Key Control Points:

- Hazardous, universal and recyclable wastes areas are secured, waste pick-ups are scheduled by AE facilities maintenance supervisor or staff by calling automated waste collection line at 713-500-5837, waste is collected/disposed by EPP

Related Forms, Records, SOPs:

- [Guidance Document 3.1 Collection of Chemical Waste](#)
- Chemlog

Personnel Responsible:

Maintenance Manager, AE

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

Safety Specialists, EPP

- Provide containers and labels when applicable
- Perform universal waste pick-up, transport to central storage area, and arrange for offsite disposal and recovery
- Document waste volume by recording in waste tracking program “Chemlog”
- Retain waste disposal manifest and records in Chemical waste Binder, located at OCB 1.330

Safety Manager, EPP

- Review waste volumes collected and determine generator status
- Report waste management activities to Chemical Safety Committee and Executive Safety Council

Director, EHS

- Provide management review

Environmental Compliance (Hazardous & Universal Wastes) Program

Task/Activity Description:

Grounds Survey, inclusive of Hazardous, Universal and Recyclable Waste

Schedule: Semiannual

To assist Auxiliary Enterprises employees, who provide maintenance for the student faculty apartments and recreation center complex, 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. Hazardous and universal wastes are stored at the maintenance building termed "Central Accumulation Area", and must meet certain conditions under state and federal environmental regulations. Wastes generated typically include: used batteries, spent lamps, mercury thermostats, paint, and used oil for recycling. Characteristic or listed hazardous wastes are generally not generated from AE facilities on a regular basis.

Inspections are performed by the EPP safety manager or safety specialist utilizing a checklist survey form. Currently, 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 maintenance supervisor. 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 EHS Assistant. 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
- Poster – "Avoid Messy Situations"

Personnel Responsible:

Maintenance Manager, AE

- Ensure wastes are labeled and stored properly

- Call EPP and request waste pickups
- Perform and document monthly and quarterly inspections according to the SWQMP
- Notify EPP of any SWQMP inspection performed by the City of Houston

Safety Manager/Safety Specialists, EPP

- Perform facility survey
- Enter deficiencies into Environmental Health & Safety Assistant (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 AE housing and recreation center maintenance staff. This training introduces and reinforces environmental management system principles, waste management practices specific to the AE business unit's operations, and environmental concerns and compliance requirements for storm water, air emissions, and hazardous materials management. The training is lead by an instructor on an annual basis, and the training materials are available on the EH&S web page.

Key Control Points:

- Communicate environmental compliance requirements, environmental management concepts, and emergency procedures to personnel who generate hazardous, universal, and recyclable wastes

Related Forms, Records, SOPs:

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

Personnel Responsible:

Maintenance Manager, AE

- Ensure AE maintenance staff attend training

Safety Manager/Safety Specialists, EPP

- Develop training materials and submit updates to for web page
- Schedule training time, place, and date (annually)
- Present training materials to AE 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

Director, EHS

- Provide management review, liaison with AE vice president if necessary
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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.