

EG 7-4: Management of Universal Wastes

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I. Activity Description:

The activity of properly identifying, storing, handling and offering for transportation and disposal of universal waste. Although universal waste is a subset of hazardous waste, universal waste consists mainly of everyday items in widespread use. Universal waste includes many wastes such as:

- A. Batteries
- B. PCB-containing light ballasts
- C. Pesticides/Herbicides
- D. Mercury-containing devices (such as mercury thermostats)
- E. Mercury-containing lighting (such as fluorescent bulbs) and
- F. Electronic devices and components (such as computers and monitors).

In order to be classified as a universal waste, a waste must first be classified as a hazardous waste. The Department of Aviation assumes all of the above waste streams meet definitions of hazardous waste and chooses to manage those waste streams under the less stringent universal waste regulations, instead of the more stringent hazardous waste regulations, as allowed by federal and state law. The Department of Aviation believes it does not purchase new mercury-containing devices; therefore, does not generate mercury-containing waste devices

Classifying and managing the above waste streams as universal wastes is intended to encourage their recycling. Economical recycling options exist for most of these wastes. In addition, classifying material as universal waste, means that they are subject to less stringent management requirements than those for hazardous waste

II. Potential Environmental Risks

- A. The Clark County Department of Aviation (CCDOA) - Environmental, Health & Safety (EHS) Section has identified the following environmental concerns associated with these activities:
 - 1. Legal management of universal wastes
 - 2. Improper handling and disposal of universal wastes
 - 3. Damage of CCDOA property
- B. Potential consequences from performing the activity incorrectly:
 - 1. Property Damage
 - 2. Personal Injury
 - 3. Long term damage to the environment
 - 4. Regulatory and judicial enforcement actions and related (financial & non-financial) penalties

Note: The following guidance applies only to Universal Waste. Use Environmental Guideline EG 7-1, General Waste Management to facilitate waste classification

III. Critical Operating Requirements

A. Prohibited Activities

1. Do not dispose of waste batteries, ballasts, waste pesticides/herbicides, waste lamps or waste electronic devices and components in a trash can or trash dumpster unless waste producer knowledge or other information confirms that the waste is not a hazardous or universal waste. Disposal of wastes in the storm sewer system is also prohibited

B. Required Activities

1. Each operator, tenant or contractor conducting universal waste management activities is responsible for understanding the applicable regulations and managing their activities accordingly. This Environmental Guideline is meant as guidance only and does not supersede any regulations

C. General Considerations

1. A producer of universal waste is called either a “large quantity handler (LQH)” or a “small quantity handler (SQH)” of universal waste. LQHs accumulate more than 5,000 kilograms (11,000 pounds) of universal waste at any one time. SQHs accumulate less than 5,000 kilograms (less than 11,000 pounds) of universal waste
2. This document will reference regulations pertaining to SQHs when referring to those who generate or accumulate universal waste as part of their operations at CCDOA. Any activities involving quantities of universal waste in excess of 5,000 kilograms (11,000 pounds) must be coordinated with the CCDOA, EHS office
3. Identify materials requiring universal waste management
4. Characterize and properly manage universal waste
5. Generate and maintain a profile with the recycling/disposal facility for all universal waste
6. All waste generators shall properly identify and characterize universal wastes using waste process knowledge and available regulatory guidance
7. Segregate, handle, store and track inventory of universal waste appropriately
8. Package, containerize, label and transport universal wastes according to DOT, Resource Conservation & Recovery Act (RCRA) and State Regulations

D. Training Requirements

1. Employee training programs shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact storm water runoff. Storm Water Pollution Prevention Plan (SWPPP) training shall address topics such as spill response, good housekeeping, waste handling, and material management practices. Contractor or temporary personnel shall be informed of

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all facility operation and design features in order to prevent discharges or spills from occurring

E. Storage and Materials Management Requirements

1. Maintain legible labels and markings on all containers and tanks

- a) Labels on all containers must have the name of the owner of the container and an associated contact information
- b) Labels must clearly describe the contents of the container (eg. "Waste Batteries" or "Universal Waste Lamps" or "Used Mercury Containing Devices" & etc.)
- c) Labels must have the date of initial accumulation
- d) Labeling may also require the owner's United States Environmental Protection Agency (USEPA) ID Code, and/or Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) information for recalled pesticides and herbicides

IV. **Planning Requirements**

- A. Maintain adequate resources to ensure correct management of universal wastes

V. **Critical Tasks**

- A. Routine inspections of universal waste storage areas must be made to ensure that containers used to store universal wastes are structurally sound, closed, compatible for the contents of the container and in good condition
- B. Universal wastes must be picked up within one year from the date of being placed in the universal waste storage area

VI. **Emergency Response**

- A. If a spill occurs, immediately stop the source of the spill if possible. Refer to Environmental Guideline EG 6-1, Spill Response.
- B. If leaking ballasts, batteries or mercury-containing equipment is discovered, the material should be considered hazardous. Contact the Airport Control Center or the appropriate Customer Service Desk for the area immediately (see phone numbers in Section IX below)
- C. The clean-up residue resulting from the spill of a universal waste pesticide must meet the Part 273 definition of a Universal Waste Pesticide in order to be managed as a universal waste. If the clean-up residue does not meet the definition of a universal waste, it is subject to All Applicable, Subtitle C requirements for hazardous waste
- D. Broken lamps must be handled as hazardous waste in accordance with Environmental Guideline 30. Once a lamp is broken, it cannot be managed as universal waste

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- E. Immediately containerize and appropriately manage any spills, residues or releases of universal wastes. Be aware of the need to determine if a new hazardous waste has been generated as a result of the release, and eliminate risks to human health and the environment
- F. Complete the CCDOA Spill Reporting Form and return the completed form to the CCDOA, EHS office within 24-hours of the release

VII. Inspection & Maintenance Requirements

- A. Maintain good housekeeping practices in waste collection areas
- B. Arrange for immediate recycling/disposal when universal waste storage areas/containers become nearly full

VIII. Expected Records and Outputs

- A. Waste profiles and land disposal restriction profiles
 - 1. Obtain waste profiles and land disposal restriction profiles prior to recycling/disposal of universal waste. Try to recycle universal waste whenever possible
- B. Shipping Documentation
 - 1. Record of shipments, such as invoices or bills of lading, are recommended for SQHs
 - 2. SQH not required to maintain records, but should document waste management activities to show evidence of SQH status
 - 3. Written records should be kept of types and quantities of universal waste shipped and received for three (3) years
- C. Evidence of Training
 - 1. While formal certifications are not necessary, some form of “proof of training” (such as sign-in sheets, that are signed by the attendees, and handouts) is recommended and should be maintained on file by the operator

IX. References

- A. Phone Numbers
 - 1. CCDOA (Airport) Control Center (spill and release reporting).....(702) 261-5125
 - 2. Henderson Executive Airport Customer Service Desk.....(702) 261-4800
 - 3. North Las Vegas Airport Customer Service Desk.....(702) 261-3806
 - 4. CCDOA Environmental, Health & Safety (EHS).....(702) 261-5692
 - 5. NDEP Spill Reporting Hotline(for spills 25 gallons or greater)..... 1(888) 331-6337

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- B. Guidance Materials (list is not limited to the following)
 - 1. Product Safety Data Sheets (SDSs) for materials being stored in the universal waste storage area
 - 2. Facility Storm Water Pollution Prevention Plan (SWPPP)
- C. Training Materials (list is not limited to the following)
 - 1. Site-Specific Waste Management Materials, (if any)
- D. Related Environmental Documents (list is not limited to the following)
 - 1. Environmental Guideline EG 1-2, Cleaning Washing - Aircraft _Vehicles and Equipment
 - 2. Environmental Guideline EG 1-3, Cargo Loading and Offloading
 - 3. Environmental Guideline EG 1-4, Management of Aircraft Lavatory Water and Waste
 - 4. Environmental Guideline EG 1-5, Maintenance of Aircraft, Vehicles and Equipment
 - 5. Environmental Guideline EG 1-7, Storage of Vehicles and Equipment Containing Chemicals
 - 6. Environmental Guideline EG 2-1, Painting and Paint Removal
 - 7. Environmental Guideline EG 2-2, Cleaning Washing - Indoor Industrial Surfaces
 - 8. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
 - 9. Environmental Guideline EG 2-4, Janitorial Activities
 - 10. Environmental Guideline EG 2-5, Cleaning Washing - Outdoor Areas and Structures
 - 11. Environmental Guideline EG 3-1, Ozone Depleting Compound Management
 - 12. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations
 - 13. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
 - 14. Environmental Guideline EG 3-5, Parts Washing
 - 15. Environmental Guideline EG 4-2, Planning and Design
 - 16. Environmental Guideline EG 4-3, Procurement
 - 17. Environmental Guideline EG 4-4, Tenant Operating Guidance
 - 18. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
 - 19. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
 - 20. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
 - 21. Environmental Guideline EG 6-1, Spill Response
 - 22. Environmental Guideline EG 6-2, Abandoned Material Response
 - 23. Environmental Guideline EG 7-1, General Waste Management

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24. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
 25. Environmental Guideline EG 7-3, Management of Hazardous Wastes
 26. Environmental Guideline EG 7-4, Management of Universal Wastes
 27. Environmental Guideline EG 7-5, Management of Special Wastes
 28. Environmental Guideline EG 7-6, Management of Materials
- E. Applicable Regulations (list is not limited to the following)
1. NAC 444/ NRS 444 Sanitation
 2. NAC 445A Water Controls
 3. NAC 445B Air Controls
 4. NAC 459/NRS 459 Hazardous Materials
 5. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
 6. 40 CFR Protection of the Environment
 7. Uniform Fire Code/ NFPA
 8. 49 CFR Transportation
 9. 29 CFR 1910 Occupational Safety and Health Standards
 10. 29 CFR 1926 Safety and Health Regulations for Construction
 11. Nevada State Fire Marshal requirements
 12. Clark County Fire Department Hazardous Materials requirements
 13. CCDOA Rules and Regulations
- F. Other Documents (list is not limited to the following)
1. Spill Report Form
 2. Waste Disposal Manifests
 3. Bill of Ladings
 4. Certificates of Recycling

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