



Verification	Originator	Approved	Issued
Initials	CMB	ST	ST
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TITLE: COFL-FF-EP-4.4.6-2 SOP15 Non-Regulated / Universal Waste

System: Non-Regulated / Universal Waste (RCRA)	Procedure No. : SOP 15
Subsystem: Training	Page No. : Page 1 of 4
Person Responsible: Program Manager	Revision No. :
	Revision Date :

The U.S. Environmental Protection Agency (EPA) and equivalent state environmental regulatory agencies regulate non-hazardous solid waste under the Resource Conservation and Recovery Act (RCRA) The U.S. EPA has designated a category of hazardous waste known as “Universal Waste” (UW). Universal Waste are hazardous wastes that are more common and pose a lower risk to people and the environment than other hazardous wastes. A small quantity handler stores no more than 5,000 kg (11,000 pounds) of UW on-site at one time. (UW) includes dry cell batteries, pesticides, fluorescent lamps, and mercury-containing equipment (e.g., liquid mercury, thermostats, switches, thermometers, relays, manometers, barometers, thermocouples, gauges). In this SOP, the term “shipping paper” includes other waste shipment tracking documents which may be referred to as a “waste-tracking invoice” or “DOT shipping paper.”

1. Purpose:

- a. This SOP has been developed to ensure that universal wastes generated at the fleet fenceline are properly handled, stored and recycled/disposed, promote safe work and responsible environmental practices including compliance with regulations and reducing the potential for negative environmental impacts.



2. Scope:

- a. This procedure applies to employees and contractors responsible for management of Universal Waste.

3. Responsibility:

- a. The **Area Supervisors** shall ensure that employees and contractors responsible for management of Universal Waste are properly trained.
- b. Adherence to these written procedures will be the responsibility of City employees and contractors, responsible for the management of Universal Waste.

4. Procedure/process:

4.1 Waste stream identification

Universal Waste commonly generated at the Fleet Fenceline is:

- Fluorescent lamps and tubes
- Batteries Lead
- Mercury Containing Device
- Antifreeze
- Waste Motor Oil
- Used Hydraulic oil
- Used Motor Oil Filters

4.2 Waste Stream Management

- Fluorescent lamps and tubes- shall be stored in a fiber drum to prevent release of mercury vapor. Once they are crushed using the bulb eater, label the drums with the Universal Waste label, add the facility address, date when drum was sealed and write **“Crushed Mercury Lamps “**. **The accumulation period shall not exceed 180 days.**
- Batteries- All used batteries shall be store in dry containers with a secondary containment. Cover one of the poles before storage.
- Thermostats- Place inside a drum and label the drum as “Mercury Containing Devices, thermostats”, accumulation date, address, EPA ID,.
- Antifreeze- Store used Antifreeze in a double wall container or a metal drum with a 110% secondary containment.
- Waste Motor Oil- Store inside an approved double wall container. Please check valves and gauges once a month as required by FDEP.



- Used Hydraulic oil- Use the same storage for waste oil and follow same procedure.
- Used Engine Oil Filters- Filters must be drained into the waste oil container for 48 hrs. After 48 hrs, place filters inside a 55 gallon drum with a 110% secondary containers and lable the drum as “Drained Used Oil Filters”, address, accumulation date and emergency contact.

4.3 Waste Vendors

- Waste Oil, Antifreeze, Used Engine Oil Filters, and Used Hydraulic Oil must be registered with FDEP as a **Used Oil Transporter and Handler**.
- Crushed bulbs- Recycler must be a register Mercury Device Handler.
- Other non-processed fluorescent bulbs must be handled by a Certified Hazardous Waste Handler (example: Clean Harbors) including HIDs and High Pressure bulbs.
- Batteries- Contact a registered batteries recycler approved by FDEP.

5. **Training/Education**

- a. Employees and contractors responsible for Universal Waste must review and fully understand this SOP.
- b. This SOP is reviewed with employees and contractors responsible for Universal Waste, and documented in the employee training log.

6. **Consequences**

Failure to comply with this SOP may:

- Result in fines for non-compliance to environmental laws and regulation relative to the discharge of hazardous waste.
- Violate COFL policy.



RECORDS

Record	Where Filed	Responsible Individual	Indexing Method	Minimum Retention Time

REVISION LOG

Revision No.	Revision Date	Description of Change(s)

AUTHORIZATION

Name	Title	Date