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| Title: Disposal of Electrical Light Ballasts, Non PCB and PCB Type | Document No.: CH-015-A |
| | Revision No.: 00 Date: 8-28-09 |
| | Approved By: Al Swavy |

- 1.0 Purpose: The purpose of this policy is to provide guidance for the disposal of electrical light ballasts that are removed from service during routine maintenance at various North and South campus locations. This policy applies to both non PCB and PCB type ballasts. On the North campus, encountering PCB type ballasts will be rare as their use was discontinued prior to most of the building construction. The South campus has gone through various relamping projects over the years and most of the PCB ballasts have been removed. However, since it is an older campus, they still may be encountered.
- 2.0 Scope: This policy applies to all university facilities staff including electricians, laborers or any other individual that may remove an electrical ballast from service. It also applies to all outside electrical contractors performing work in any University at Buffalo building or on University at Buffalo property.
- 3.0 Applicable Guidelines: Refer to UB Hazardous Chemical Waste Management Guidebook concerning the management and disposal of hazardous waste and hazardous materials. UB facilities personnel should refer to the University Facilities Safety Manual, Hazardous Waste Disposal Policy for additional guidance. Any additional questions may be addressed to the UB EHS Hazardous Waste Manager.
- 4.0 Responsibilities: The primary responsibility for following this policy falls with the person removing ballasts from electrical equipment. However, the individual supervising the electricians removing the ballasts from service must also be aware of this policy. Outside contractors are also obligated to follow this policy.
- 5.0 Definitions:
 - 5.1 Electrical ballast: An electrical light ballast is a device intended to limit the amount of current in an electrical circuit. These are commonly used to light fluorescent bulbs. Light ballasts present at UB will fall into one of two categories, Non PCB or PCB type.
 - 5.2 Polychlorinated Biphenyls: PCBs are a class of organic compounds that were used as dielectric fluids in electrical components such as transformers, capacitors and ballasts. Production of PCBs was halted in 1979.
 - 5.3 Non PCB light ballast: Ballasts of this type can be identified by referring to the label on the ballast. If the label reads "contains no PCBs" or "no PCBs" it is a non PCB ballast. If that phrase is not located on the label, you must assume the ballast to be the PCB type. Contact the UB EHS Hazardous Waste Manager if assistance is required to properly identify a type of ballast.
 - 5.4 PCB light ballast: Certain older ballasts (pre 1979) contain PCBs internally and must be collected separate from the non PCB type. Some PCB type ballasts are still in service on the South Campus. They are unlikely to be encountered on the North Campus.
 - 5.5 Satellite accumulation area (SAA): Area set aside within a building for the temporary storage of small amounts hazardous waste. Storage is limited to less than 55 gallons at any one time. PCB ballasts are considered hazardous waste in New York State

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and must be stored according to regulations pertaining to SAAs outlined by the USEPA and NYSDEC.

6.0 Procedures:

- 6.1 Non PCB and PCB ballasts must be accumulated and stored separately.
- 6.2 Collection of non PCB ballasts: Properly identified Non PCB ballasts should be collected and placed in 55 gallon drums obtained from UB EHS. The drums should clearly be labeled "Ballasts-Non PCB." This label can be obtained through UB EHS. Other size containers may be used as needed. The drum(s) are to be placed in temporary storage at one of the following locations; North Campus Electric Shop in the Beane Center, in the Helm warehouse North Campus or MRS South Campus in the Howe building. As the ballasts are collected from various campus locations, they are to be placed into the labeled 55 gallon drum upon arrival at the applicable temporary storage location.
- 6.3 Collection of PCB ballasts: If the ballasts have been identified as containing PCBs, they are considered to be hazardous wastes and regulations require them to be collected and stored as such. They must be stored in a properly maintained satellite accumulation area (SAA). Since the volume of PCB ballasts collected will be significantly less than the non PCB type, a 5 gallon pail should be utilized for storage. The pail must have both a PCB contaminated waste and a hazardous waste label affixed to it prior to any ballasts being placed inside. These labels are available through UB EHS. The pail(s) are to be placed in temporary storage at the following locations; North Campus Electric Shop in the Beane Center, in the Helm warehouse North Campus or MRS South Campus in the Howe building. As the ballasts are collected at various campus locations, they are to be placed into the 5 gallon pail upon arriving at the applicable temporary location. The pail is to remain closed at all times except when additional ballasts are being added. Disposal of PCB ballasts must be arranged prior to the maximum storage time of 90 days.
- 6.4 Leaking ballasts: If any ballasts (either non PCB or PCB) are found to be leaking when removed from service, special precautions should be taken. Nitrile gloves should be worn prior to handling devices and they should be placed in a secure, leak-proof container for transport back to the storage area. Generally, the leak will be the result of a highly viscous (thick) material contained inside the ballast and will not require spill cleanup activities. Upon arrival at the storage area the leaking ballast can then be put into the appropriate non PCB or PCB storage container.
- 6.5 Disposal of containers: Once either the non PCB or PCB containers are ready to be disposed, contact UB EHS for pickup. EHS will replace the container being picked up with an applicable empty one.

- 7.0 Document Management: This procedure shall be reviewed once every two years, or as changes require.

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8.0 Associated Documents and regulations:

8.1 Campus Commitment to Safety, University at Buffalo, Office of the Provost, Office of the Senior Vice President, April 3, 2001.

8.2 University Facilities Safety Policy, "Light Ballasts"

8.3 Code of Federal Regulations (CFR): 40 CFR Part 761

8.4 NYSDEC: 6NYCRR Part 370

9.0 Associated EH&S Documents:

9.1 Hazardous Chemical Waste Management Guidebook

10.0 Document Revision History:

| Revision | Section(s) Changed | Change(s) Made: | Date |
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12.0 Document Author: Anthony Oswald, Hazardous Waste Manager, UB EHS