

NEW YORK CITY DEPARTMENT OF EDUCATION
DIVISION OF SCHOOL FACILITIES
OFFICE OF BUILDING SERVICES

August 31, 2011

OFFICE OF BUILDING SERVICES CIRCULAR NO. 2 – 2011/12

NOTE: All Circulars are to be kept in a permanent file

TO ALL CUSTODIAN ENGINEERS AND BUILDING MANAGERS

THE NEW YORK CITY SAFE HANDLING OF UNIVERSAL & ELECTRONIC WASTE PROGRAM

The Federal Environmental Protection Agency (EPA) and the City of New York have entered into a consent agreement that requires compliance for the safe disposal practices of both universal and electronic waste at all City Agencies including the Department of Education. To enforce this agreement, the City of New York, through the Department of Sanitation, has established the NYC Safe Handling of Universal and Electronic Waste Program.

As a condition of this consent agreement, the Department of Education's Regulatory Determination Memo Regarding Lighting, Electronics, Battery, and Mercury Waste was developed in order to define our electronic and universal waste disposal procedures (See copy attached).

For the purpose of this consent agreement, universal waste shall refer to any lamp (bulb) that contains a heavy metal, including all fluorescent, high intensity discharge (HID), neon, mercury vapor, high pressure sodium and metal halide lamps. Incandescent bulbs are not considered universal waste, and therefore, may be disposed of through the regular waste stream. Electronic waste (aka E Waste) shall include electronic equipment that contains heavy metals, (i.e. mercury and lead) and includes desktop computers, laptops, computer monitors, printers, and televisions.

As you are already aware, it is illegal to dispose of either universal or electronic waste directly into the regular waste stream. The Department of Education has issued Circular No. 3 – 2006/07 "Light Bulb Recycling Program" which provides the procedures to follow for the safe disposal of light bulbs containing heavy metals. Additionally, the Division of Information and Instructional Technology (DIIT) has established procedures through its contracted vendor for the safe removal and disposal of electronic waste (not including televisions). Please read the attached file "DIIT Disposal Policy for E Waste" and share it with your principal(s). Advise them to contact the DIIT help desk at (718) 935-5100 to schedule disposal of their electronic waste.

To ensure our compliance under the consent agreement, audit inspections will be conducted at a representative sample number of our buildings. A list of the sample buildings will be shared with your Deputy Director of Facilities (DDF). They will advise you as to whether or not your building was selected to participate in the audit inspections. Regardless of whether or not your building is selected for an audit inspection, you must always demonstrate compliance of the proper disposal practices for universal and electronic waste.

To assist you in ensuring compliance under the NYC Safe Handling of Universal and Electronic Waste Program, the following information provides a general description of your responsibilities.

- Universal and electronic waste are not to be disposed of with the regular trash.
- Universal waste is to be stored neatly in secured areas, away from where regular trash is stored.
- Universal waste is to be stored in either the issued fiber drums, or in the same type corrugated carton that the lamps were received in when new.
- The fiber drums/corrugated cartons containing the universal waste lamps must be in sound and undamaged condition, and must be kept closed at all times.
- The fiber drums/corrugated cartons must be stacked on pallets or chocks, and are not to be in direct contact with the ground/floor.
- Storage areas must be kept clean, neat, organized and uncluttered.
- All fiber drums/corrugated cartons must be labeled and dated with the date the first lamp was placed within it.
- All fiber drum/corrugated carton labels must be clearly visible from the storage area aisle space.
- The fiber drums/corrugated cartons must be removed from the premises and properly disposed of within one year from when the first lamp was placed into the drum/carton.

THE NEW YORK CITY SAFE HANDLING OF UNIVERSAL & ELECTRONIC WASTE PROGRAM, Continued

- In preparation for transporting, corrugated cartons must be sealed with tape when full and fiber drums must be properly closed.
- Disposed lamps of different sizes are not to be placed together in the same fiber drum/corrugated carton.
- Be prepared to substantiate that all custodial staff handling universal waste lamps, (including yourself), have been trained, with signed off certification available for review on site. Contact your DDF if you were not previously trained.
- Proper signage is to be placed at the entrance to the area where universal waste lamps are stored (See copy attached).
- All documentation pertaining to shipping, manifests and certificates for the safe disposal in handling universal lamp material is kept on file with the Division of School Facilities at 44-36 Vernon Blvd. Requests to review this documentation are to be brought to your DDF's attention.
- All documentation pertaining to the safe disposal of electronic waste material through DIIT, will be mailed to the school's Principal or their designated contact person approximately 30 days after the material was removed. This includes the detailed settlement report and certificate of disposal.

To further ensure our compliance under the consent agreement, the following procedures must also be adhered to;

Electronic Waste Disposal (Including desktop computers, laptops, computer monitors, printers, etc) - See the "DIIT Disposal Policy for E Waste" which is attached to this circular. This document explains the procedures that principals, or their designees, need to follow. It also lists the electronic items eligible and ineligible for pickup under the DIIT electronic waste disposal contract.

Television Disposal (Not including computer monitors) - To arrange for the disposal of undamaged televisions, i.e. screen is not cracked or broken, your principal must first indicate in writing that they are authorizing you to commence with the equipment's disposal. They are to provide a description of the television, including the make, model and serial number. Once you have this information you may proceed to create a work request to have the television scheduled for removal by our Trucking Department. For tracking purposes, in the short description field you are to indicate your geographic district, your building ID and the phrase "Television Removal Program". As an example, K001 would provide the following information in the short description field; 15K001/Television Removal Program. In addition, on the work request you are to indicate trade code 44 (Trucking) and include the job type BP. In the instruction field, indicate the total quantity of televisions to be disposed of.

Physically Damaged Television Disposal (Not including computer monitors) - In the event a television is physically damaged with a cracked or shattered screen, the broken television and its contents are to be placed in a sealed corrugated carton, with a label on the carton stating "Leaded Glass from Televisions or Computer Monitors – Do Not Mix with Other Glass Materials"(See label attached). Again your principal must first indicate in writing that they are authorizing you to commence with the damaged equipment's disposal. They are to provide a description of the damaged television, including the make, model and serial number. Once you have this information you may proceed to create a work request to have the damaged television scheduled for removal by our Trucking Department, following the above instructions on the disposal of televisions. In the instruction field you are to include the phrase "Damaged Television", and indicate the quantity.

Physically Damaged Computer Monitor - In the event a CRT computer monitor is physically damaged with a cracked or shattered screen, the broken monitor and its contents are to be placed in a sealed corrugated carton, with a label on the carton stating "Leaded Glass from Televisions or Computer Monitors – Do Not Mix with Other Glass Materials" (See label attached). The carton is to be stored indoors, and the principal, or their designee, is to be notified to make arrangements for disposal by contacting the DIIT Help desk at (718) 935-5100.

Re-Lamping - Effective immediately, lamps containing heavy metals, i.e. fluorescent, high intensity discharge (HID), neon, mercury vapor, high pressure sodium and metal halide, that burn out, are not to be replaced in areas during occupancy. These type lamp changes are to be performed when areas are unoccupied.

**THE NEW YORK CITY SAFE HANDLING OF UNIVERSAL & ELECTRONIC WASTE
PROGRAM**, Continued

Incidental Breakage Procedure for Lamps Containing Heavy Metals - In the event of incidental breakage, as per the attached determination memo, you are to immediately contact your Deputy Director of Facilities (DDF) and advise them of the occurrence. Your DDF will review the circumstances and advise you of the specific method for handling the cleanup and disposal of the broken lamp. Incidental breakage of a heavy metal containing lamp can lead to the lamp's contents being released into the atmosphere. To minimize exposure to these materials, general cleanup procedures may include some or all of the following steps. Contact your DDF first to determine the appropriate course of action that will address your specific circumstances.

- The area where the breakage occurred is to be vacated immediately.
- The space is to be ventilated for 5-10 minutes by opening a window or door to the outdoor environment.
- Any HVAC system supplying the area where the breakage occurred is to be shut down.
- Do not sweep, mop, or vacuum the broken lamp particles.
- Wearing a dust mask and protective gloves, first remove the larger pieces.
- Remove the smaller pieces by utilizing two stiff pieces of paper such as large index cards.
- Any remaining particles are to be collected with a damp cloth or by utilizing the sticky side of either duct, packing, or masking tape.
- All broken lamp material is to be stored in a re-sealable container, i.e. a five gallon bucket that has a plastic liner placed within it. The container is to be labeled "Broken Lamp Material" (See label attached). You may utilize any existing re-sealable plastic container you have available.
- When the cleanup is completed, the plastic liner is to be tied closed and the container is to be sealed.
- Continue to ventilate the area as required.
- Once the broken lamp debris is placed in a container, you are to immediately generate a work request for the expedited removal of the container by the Trucking Department. For tracking purposes, in the short description field, please indicate your geographic district, your building ID and the phrase "Broken Lamp Removal". As an example, K001 would provide the following information in the short description field; 15K001/Broken Lamp Removal. In addition, on the work request you are to indicate trade code 44 (Trucking) and include the job type BP. In the instruction field, indicate the total quantity of containers to be disposed of.
- While awaiting pickup, the container is to be stored with your other universal waste lamps.

Note: If a lamp breaks in a fiber drum or corrugated carton, the fiber drum/corrugated carton is to be closed/sealed and prepared for shipping as normally handled, following the standard work request procedures for lamp disposal.

Please contact your Deputy Director of Facilities if you have any questions regarding this information.

John Shea
Chief Executive Officer
Division of School Facilities

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Attachments (5)