



University of New Haven

POLICIES AND PROCEDURES

Policy Title:

**UNH Hazardous Waste
Manifest Policy**

Policy No.: 8214
Rev.: June 15, 2016
Effective Date: February 4, 2016
Last Revision: January 2024

Responsible Office: Department of Public Safety

Responsible Official: Associate VP of Public Safety & Administrative Services

Table of Contents

- 1.0 Policy Statement 1
 - 1.1 Purpose and Scope 2
 - 1.2 Review 2
- 2.0 Roles and Responsibilities 2
 - 2.1 Associate Vice President of Public Safety & Administrative Services 2
 - 2.2 Associate Vice President of Facilities 3
 - 2.3 Facility Department Administrative Assistant 3
- 3.0 Hazardous Waste Manifests 3
 - 3.1 Completing the Manifest 3
 - 3.2 Confirmation of Delivery from the TSDF 3
 - 3.3 Manifest Tracking 4
 - 3.4 Retention of Records 4
- 4.0 Administrative Duties 4
- 5.0 Training 4

1.0 Policy Statement

The University of New Haven accumulates, offers for transport, and disposes of hazardous wastes in accordance with United States Environmental Protection Agency (EPA), Connecticut Department of Energy and Environmental Protection (CT DEEP) and Department of Transportation (DOT) regulations.

1.1 Purpose and Scope

This plan provides a written description of the hazardous waste manifest procedures at the University of New Haven. This policy has been developed to comply in full with EPA (40 CFR 262) and CT DEEP (Section 22a-449(c)-102) regulations for the proper completion and distribution of manifest copies. In addition, this policy outlines the University of New Haven's internal manifest tracking system that is in place to assure compliance with EPA and CTDEEP regulations.

1.2 Review

The Associate Vice President of Public Safety and Administrative Services will review and update this policy whenever necessary or at least annually.

All the elements of this policy are considered University of New Haven policy and may be enforced as such. Failure on the part of the employees to follow the policy may result in disciplinary action.

2.0 Roles and Responsibilities

The following individuals have these responsibilities with regard to this hazardous waste manifest policy.

2.1 Associate Vice President of Public Safety & Administrative Services

- Assure that only properly trained University personnel sign for all waste shipped on a hazardous waste manifest.
- If a return copy of manifest(s) has not been returned within 35 days, inquire with transporter or end facility regarding status of hazardous waste.
- Assure return copy manifests are married up with generator copy of the manifests within the required timeframe set forth by the CT DEEP.
- Update this policy as necessary or at least annually.
- Keep at least the last three years of hazardous waste manifests on file.

2.2 Associate Vice President of Facilities

- Assure that all facility personnel signing the hazardous waste manifests have received the appropriate training.

2.3 Facility Department Administrative Assistant

- Obtain hazardous waste manifest from signee.

3.0 Hazardous Waste Manifests

The University of New Haven offers for transportation of hazardous waste for off-site treatment, storage/ or disposal and is required by EPA and CT DEEP regulations to prepare and complete a hazardous waste manifest for each shipment.

3.1 Completing the Manifest

All University of New Haven staff signing a hazardous waste manifest is required to have appropriate training to do so. Each signee must be current with their annual Resource Conservation and Recovery Act (RCRA) hazardous waste training as well as had DOT training within the last three years.

The hazardous waste manifest is provided and filled out by the University of New Haven's hazardous waste transporter. Before signing all hazardous waste manifests, it is the responsibility of the university's designee to sign the manifest to assure that all information included within the manifest is accurate.

As of September 29, 2015, generators are no longer required to submit a copy of their completed manifest to DEEP. There is a [DEEP letter](#) that documents this change in procedure.

3.2 Confirmation of Delivery from the TSDF

The University of New Haven should expect copy 3 of the manifest back from the treatment, storage and disposal facility (TSDF) within 60 days of the initial shipment. This will be a signed copy stating that the TSDF received the waste. If the University of New Haven does not receive this return copy within 60 days, it is required that the university submits to the Commissioner a legible copy of the manifest with some indication that the confirmation of delivery was not received.

It is the responsibility of the Associate Vice President of Public Safety & Administrative Services to make certain that the above timelines and notifications are met.

3.3 Manifest Tracking

The University of New Haven uses an excel spreadsheet to track all hazardous waste shipments. This spreadsheet includes the following information:

- Manifest number;
- Date shipped;
- Designated facility;
- Verification TSDf copy was received by university with 60 days of shipment.

It is the responsibility of the manifest signer to bring the signed manifest to the Associate Vice President of Public Safety & Administrative Services office and to add it to the appropriate hazardous waste manifest binder within two business days of signing the manifest.

The Associate Vice President of Public Safety & Administrative Services will make periodic inspections of both the tracking spreadsheet and the manifest binder to assure compliance with all applicable regulations.

3.4 Retention of Records

The EPA and CT DEEP require that the generator of a hazardous waste retain a signed copy of the hazardous waste manifest for each shipment for at least three years. The original copy serves this purpose until he/she receives a signed copy from the designated (receiving) facility as confirmation of delivery. The copy received from the designated facility should be kept by the generator for at least three years from the date the waste was accepted by the initial transporter.

4.0 Administrative Duties

A copy of all University of New Haven hazardous waste manifests along with an updated manifest tracking spreadsheet can be found in the Associate Vice President of Public Safety & Administrative Services office.

5.0 Training

The University of New Haven shall assure all signers of hazardous waste manifests have the required training.

Manifest signers must receive annual Resource Conservation and Recovery Act (RCRA) hazardous waste training as well as DOT training every three years.

All training records can be accessed in the Associate Vice President of Public Safety and Administrative Services office upon request.