I. Policy Statement

The Environmental Health and Safety Office “EHS” through the Department of Administrative Services, Environmental & Emergency Management provides services for the university community as to compliantly and cost efficiently dispose of hazardous and specialty waste materials (chemical, biological and radiological, other) that are generated by UMass Lowell academic curriculum, research, and general operations. A Hazardous & Specialty Waste Materials disposal charge back of cost program is required to support the university’s EHS compliance program and expenses associated with waste disposal.

II. Purpose

The Hazardous & Specialty Waste Materials Disposal Charge Back of Cost Program recognizes the importance for assessing a monetary fee on hazardous and specialty waste producing products being purchased as a means to provide an availability of funds to responsibly, compliantly and cost effectively dispose of the waste products as required by governance agencies as EPA, DEP, DPH and local ordinances. The charge back approach applies a determined annual equitable cost to university members and departments who generate products requiring such disposal.

III. Scope

This Hazardous & Specialty Waste Materials Disposal charge back of cost program applies to all materials that require regulated disposal services purchased by UMass Lowell curriculum, research, general operations offices, departments, centers and programs that purchase products using any type of University managed funds, this includes sponsored and non-sponsored funds.

IV. Definitions

Hazardous & Specialty Waste Materials - are products purchased that require regulated disposal services as defined by governance agencies such as EPA, DEP, DPH and local ordinances.
V. Procedures

This procedure is applicable to all university curriculum, research and general operations offices, departments, centers and programs that purchase products.

Program cost determination:

1. Utilizing University financial reporting tools, EHS determines the annual preceding total year cost for products purchased that are managed through the EHS Hazardous and Specialty Waste Disposal Program.

2. The charge back program carefully reviews EHS waste disposal program costs from the preceding year and products purchased to determine a total year’s cost for disposal services. This information is provided through UMass Lowell EHS Office and the UMass Lowell Procurement Services.

3. The annual charge back of cost assessment is determined by simple division of the preceding annual cost for products purchased divided by the preceding annual cost for waste disposal services. Note that this process encourages the University community to reduce disposal costs as much as possible via proper labeling, reduction of over purchasing of hazardous materials, etc.

   Example:
   a) FY17 total for program products purchased = $394,730.00
   b) FY17 Hazardous & Specialty Waste Materials Disposal Costs = $89,800.00
   c) FY17 annual cost of .23 cents per dollar is recognized as the assessed value.
      (divided by (a / b = c)

4. EHS will review account purchases on a quarterly basis and through appropriate contract representatives, implement the charge back assessment for that period.

5. The following items are also noted as exempted from charge back program.

   a. Lab type gas cylinders are exempt and will be paid by owner in full for disposal service.

   b. Capital Project related waste disposal costs are exempt and to be paid for as part of the project cost or through other identified means.

   c. Cost associated with Laboratory spills and releases of hazardous and specialty materials are exempt from this program and will be paid from EHS funds.

   d. University recognized entrepreneurial entities, private partnerships and collaborations that require disposal of hazardous and specialty waste materials are exempt from this program and will be subject to direct charge back costs recognized from EHS support services and or lease agreement.
VI. Responsibility

EHS is the responsible office for implementing the provisions of this policy.

VII. Attachments

None

VIII. Related Policies, Procedures and Announcements

None

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