



UNIVERSITÀ
DEGLI STUDI
DI PADOVA

OPERATING PROCEDURE NO. 16

WASTE RESULTING FROM MAINTENANCE ACTIVITIES

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Curated by:

Environment and Safety Office



WASTE MANAGEMENT METHODS FOR WASTE RESULTING FROM MAINTENANCE ACTIVITIES

Scope of application

Maintenance waste includes all waste generated from operations necessary to maintain the efficiency and functionality of plants and equipment. Maintenance activities are characterized as work performed by a company that involves the replacement or removal of various materials.

Among the main types of waste resulting from maintenance activities are:

- Waste from construction and demolition activities, including earthworks, asbestos-containing materials (ACMs), and drywall;
- Waste from minor building maintenance or maintenance of plumbing/electrical systems;
- Waste from the maintenance of ventilation/air conditioning systems (filters);
- Waste from the maintenance of chemical fume hoods and biological safety cabinets (HEPA filters, activated carbon filters, etc.);
- Waste from the maintenance of printers and photocopiers (used toner cartridges);
- Waste from the maintenance of septic tanks and wastewater treatment plants handling effluents similar to domestic or industrial wastewater (sludge and screenings);
- Waste from the maintenance of green areas (grass clippings and prunings);
- Waste from the maintenance of vending machines for food/beverages and drinking water dispensers.

Terms and Definitions

- **Waste:** Any substance or object that the holder discards, intends to discard, or is required to discard (Article 183, paragraph 1, letter a of Legislative Decree No. 152/2006);
- **Special Waste:** Defined in Article 184, paragraph 3 of Legislative Decree No. 152/06 as:
 - Waste from agricultural and agro-industrial activities;
 - Waste from demolition, construction, and excavation activities, subject to Article 184-bis;
 - Waste from industrial processing;
 - Waste from craft activities;
 - Waste from commercial activities;
 - Waste from service activities;
 - Waste from recovery and disposal activities, sludge from water treatment and wastewater purification, and flue gas treatment residues;
 - Waste from healthcare activities.



- **Hazardous Waste:** Defined in Article 184, paragraph 5 of Legislative Decree No. 152/06, including any special waste classified as hazardous due to the concentration of hazardous substances and/or its intrinsic hazardous characteristics, as indicated in the annexes to Part IV of Legislative Decree No. 152/2006 and subsequent amendments. These are explicitly identified with an asterisk in the European Waste Catalogue (EWC) code;
- **Waste Producer:** The entity whose activity generates waste (initial producer) or any entity that carries out pretreatment, mixing, or other operations that modify the nature or composition of the waste (new producer);
- **Holder:** The waste producer or any natural or legal person in possession of the waste;
- **Recovery:** Any operation whose main result is to allow waste to fulfill a useful role;
- **Disposal:** Any operation other than recovery, even if the process leads to the secondary recovery of substances or energy;
- **Temporary Storage Before Collection:** The grouping of waste for transportation to a recovery and/or disposal facility, carried out before collection as per Article 185-bis. In our University, the Temporary Storage site is identified as a Local Unit.

Operational Procedures

The maintenance company that operates independently with professionalism, organizational autonomy, and managerial and decision-making independence (equipment, personnel, etc.) is considered the Initial Waste **Producer**.

For this reason, the maintenance operator is responsible for:

- Completing the **waste load and unload register**;
- Filling out and signing the **Waste Identification Form (FIR)**.

Legislative Decree 152/06 specifies that the place where waste is generated is *"to be understood as the entire area where the activity that generated the waste takes place"*. Therefore, it is legitimate for the client to provide the maintenance operator with a suitable area (temporary storage) to collect waste produced during maintenance activities. At the worksite, temporary storage is allowed under Article 230 of Legislative Decree 152/06, as the production site is considered equivalent to the temporary storage site.

The waste collection area must be agreed upon with the *Facility Manager* where the maintenance work is carried out and must be suitable for the type of waste being collected. The maintenance company remains responsible for: proper management of the temporary storage, coordination of the waste transporter and ensuring the storage area is cleared of obsolete materials after use.

If small quantities of waste are generated, making a dedicated storage area unnecessary, transport from the actual production site to the company's premises may be accompanied by a Transport Document (DDT) instead of a Waste Identification Form (FIR). The DDT must indicate the exact place of production, the type and quantity of materials, the number of packages or an estimated weight or volume and the destination of the waste.

If the maintenance operator independently transports the waste without transport limitations, they must:

- Be registered with the National Register of Environmental Managers (*Albo Gestori Ambientali*);
- Hold the necessary transport authorizations for the European Waste Code (EWC) assigned to the maintenance waste.

Flowchart

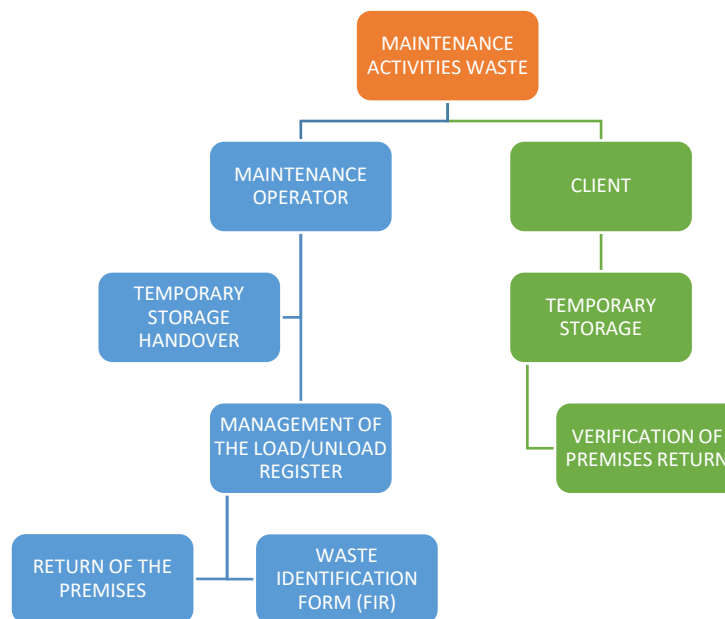


Fig 1: Summary of the waste return process from maintenance activities

Use of Personal Protective Equipment (PPE)

All waste handling and transportation operations must be carried out while wearing appropriate Personal Protective Equipment (PPE). The choice of suitable PPE should be based on the type of risk associated with the waste being handled and stored and the risks related to handling and storage operations.

A precautionary approach is recommended when managing waste. For any further information, you may contact the Environment and Safety Office – Environment Sector at the following email: ambiente@unipd.it.

Regulatory References

- Technical regulation for the management of waste from activities of the University of Padua



- Legislative Decree No. 116 of September 3, 2020
- Legislative Decree No. 152 of April 3, 2006, as amended
- Legislative Decree No. 81 of April 9, 2008, as amended

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