

Understanding the Universal Waste Rule Requirements



Overview

- This presentation will cover the following topics:
 - Terms
 - Universal waste handler requirements
 - Universal waste transporter requirements
 - Resources and contact information

Terms

- *Universal Waste* – certain hazardous wastes commonly generated by business and industry. They include:
 - **Batteries** such as nickel-cadmium (Ni-Cd), lithium ion, and small sealed lead-acid batteries, which are found in many common items, including electronic equipment, cell phones, portable computers, and emergency backup lighting.
 - **Agricultural pesticides** that have been recalled or banned from use, are obsolete, have become damaged, or are no longer needed due to changes in use.
 - **Lamps** which can include mercury or lead. Examples include fluorescent, high-intensity discharge (HID), neon, mercury vapor, high-pressure sodium, and metal halide lamps.
 - **Mercury-containing items** used in industry, hospitals, and households. Examples include mercury containing thermostats, barometers, manometers, temperature and pressure gauges, and mercury switches, such as light switches in automobiles.

Terms

- *Universal Waste Rule* – a streamlined management program for certain hazardous wastes. The rule is designed to encourage recycling and proper disposal of some common hazardous wastes and to reduce the regulatory burden on businesses that generate these wastes.
- *Handler* – anyone who produces universal waste and anyone who receives universal waste from others before sending it to a recycler or treatment, storage and disposal facility.
 - *Both a generator and potential contractor would be considered handlers.*
- *Transporter* – someone who ships universal waste from a handler to another handler or a destination facility.
 - *A transporter can also be a handler.*
- *Destination Facility* – a facility that recycles, treats, or disposes universal waste

Terms

- *Small Quantity Handler of Universal Waste* - accumulates less than 11,000 lb of all universal waste categories
- *Large Quantity Handler of Universal Waste* - accumulates 11,000 lb or greater of all universal waste categories.

Your Responsibilities as a Universal Waste Handler

Accumulation Limits



- Handlers are required to
 - Prove length of time that universal wastes have been accumulated
 - Write accumulation start date on each universal waste item or the container in which they are stored
- Starting from date it becomes a waste, universal waste cannot be stored for more than 1-year

Labeling

Each container must be labeled with one of following phrases depending on the type of waste you have:

- **Universal Waste** – [Lamp(s), Batteries, Pesticides, Mercury-Containing Equipment, Mercury Thermostats]
- **Waste** [Lamp(s), Batteries, Pesticides, Mercury-Containing Equipment, Mercury Thermostats]
- **Used** [Lamp(s), Batteries, Pesticides, Mercury-Containing Equipment, Mercury Thermostats]

And, must include 1st date of accumulation

EXAMPLE:

Universal Waste – Lamps

Accumulation Start Date: _____

Dedicated Storage Area

- Not required, but a good idea.
- Factors to consider in selecting site:
 - The security of the area and whether it is dry with good ventilation
 - Types & size of containers & where will be placed
 - How much material will be stored between pick-ups
 - Convenience for employee & recycler access

Example Signage for Storage Area

Not required, but a good idea.

CAUTION

Waste Mercury-Containing
Lamp Storage Area

Waste Management Requirements

- Store universal waste in containers that are:
 - Structurally sound
 - Adequate to prevent breakage
 - Compatible with the contents of the lamps
- Containers must remain closed & must lack evidence of leakage, spillage or damage that could cause leakage
- See 40 CFR 273 for a full summary of waste management requirements for each type of universal waste



“Do’s and Don’ts”



Improper Storage



Proper Storage

Shipping Requirements

- Universal waste must be sent to another universal waste handler or destination facility that agrees to accept it.
- If a handler transports universal waste off-site, the handler becomes a transporter and must also comply with transporter requirements.



Training Requirements



- Training must cover proper handling and emergency procedures appropriate to the types of universal waste at the facility.
- ***Small Quantity Handlers*** must inform employees who handle or have responsibility for universal waste of this information.
- ***Large Quantity Handlers*** must ensure that all employees are *thoroughly* familiar with information.

Recordkeeping

Requirements:

- ***Accumulation records***
 - Handlers must be able to demonstrate the length of time that the lamps have been accumulated from the date it becomes a waste
- ***Shipping records*** (Large Quantity Handlers only)
 - Record of each shipment including name and address of facility where the lamps were sent, quantity of each type, and date it left the facility
 - Retain for 3 years from the date a shipment left the facility

Although not required, it is a good idea to keep training records.

Certificate of Recycling



- Not a requirement, but a good idea.
- A certificate should include:
 - Quantity of each universal waste received
 - Date received
 - Confirmation that it was processed in accordance with all state and federal laws

Your Responsibilities as a Universal Waste Transporter

Handler/Transporter Requirements

- **Management**

- Transporters are prohibited from disposing of universal waste or treating universal waste unless there is a release

- **Storage:**

- Up to 10 days at a transfer facility
- More than 10 days requires compliance with universal waste handler requirements
- Storage more than 1 year requires a permit

- **Releases:**

- Transporters must contain all releases and determine if they are hazardous

Universal Waste Rule Resources

- Idaho DEQ Resources:
 - Universal Waste Rule - www.deq.idaho.gov/waste-mgmt-remediation/hazardous-waste/universal-waste.aspx
 - Mercury Spills - www.deq.idaho.gov/waste-mgmt-remediation/hazardous-waste/mercury/what-to-do-if-you-have-a-spill.aspx
- For full text of the Universal Waste Rule log on to:
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr273_main_02.tpl
- EPA Resources:
www.epa.gov/osw/hazard/wastetypes/universal/laws.htm

Questions???

- If you have questions after today, contact your local DEQ office for help.

Coeur d'Alene	769-1422
Lewiston	799-4370
Boise	373-0550
Twin Falls	736-2190
Pocatello	236-6160
Idaho Falls	528-2650

