



Basic Overview of the Requirements for Different Hazardous Waste Types

Type of Universal Waste	Lamps	Batteries	Mercury Containing Equipment	Pesticides	Aerosol Cans
Overall Management	Must manage in a way that prevents releases of any UW or components of a UW to the environment.				
Container Requirements	<p>Must contain any lamp in containers or packages that are:</p> <ul style="list-style-type: none"> - Structurally sound, - Adequate to prevent breakage, and - Compatible with the contents of the lamps <p>Such containers and package must:</p> <ul style="list-style-type: none"> - Remain closed - Lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. 	<p>Any battery that shows evidence of leakage, spillage, or damage must be contained in a container that is:</p> <ul style="list-style-type: none"> - Closed, - Structurally sound, - Compatible with the contents of the battery, and - Must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. 	<p>Must place in a container mercury containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. The container must be:</p> <ul style="list-style-type: none"> - Closed, - Structurally sound, - Compatible with the contents of the device, - Must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions and must be reasonably designed to prevent the escape of mercury into the environment by volatilizations or any other means. 	<p>Must be contained in one or more of the following:</p> <ul style="list-style-type: none"> - A container that remains closed, structurally sound, compatible with the pesticide, and lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, or - A container that does not meet the requirements described above that is overpacked in a container that does meet the requirements described above, or - Additional requirements for tanks and transport vehicles are described at 40 CFR 273.13(b)(3) and (4). 	<p>Must be accumulated in a container that is</p> <ul style="list-style-type: none"> - Structurally sound, - Compatible with the contents of the aerosol cans, - Lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, and - Is protected from sources of heat.

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Response to releases	Must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause a release of mercury or other hazardous constituents to the environment.	Must contain any UW battery that that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container.	Must place in a container mercury containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.		UW aerosol cans that show evidence of leakage must be packaged in a separate closed container or overpacked with absorbents, or immediately punctured and drained in accordance with 40 CFR 273.13(e)(4) or LQH puncturing requirements
Labeling	Each lamp or a container or package in which such lamps are contained must be labeled or mark clearly with any one of the following phrases: <ul style="list-style-type: none"> - Universal Waste – Lamp(s) - Waste Lamp(s) or - Used Lamp(s) 	Each battery or a container in which the batteries are contained, must be labeled or mark clearly with any one of the following phrases: <ul style="list-style-type: none"> - Universal Waste – Battery(ies) - Waste Battery(ies) or - Used Battery(ies) 	Each device or a container in which the mercury containing equipment is contained, must be labeled or marked clearly with any of the following phrases: <ul style="list-style-type: none"> - Universal Waste – Mercury Containing Equipment - Waste Mercury-Containing Equipment or - Used Mercury-Containing Equipment <i>A UW mercury-containing thermostat</i> or container containing only UW containing thermostats may be labeled or marked clearly with any of the following phrases: <ul style="list-style-type: none"> - Universal Waste – Mercury Thermostat(s), - Waste Mercury Thermostat(s), or - Used Mercury Thermostat(s) 	A container, (or multiple container package unit), tank, transport vehicle or vessel in which recalled UW pesticides as described in 40 CFR 273.3(a)(1) are contained must be labeled or marked clearly with: The label that was on or accompanied the product as sold or distributed; and The words: <ul style="list-style-type: none"> - Universal Waste – Pesticide(s) or - Waste – Pesticide(s) If the container, tank or transport vehicle or vessel held unused pesticides, there are additional labeling requirements in 40 CFR 273.14(c).	Each aerosol can or a container in which the aerosol cans are contained must be labeled or marked clearly with any of the following phrases: <ul style="list-style-type: none"> - Universal Waste – Aerosol Can(s) - Waste Aerosol Cans(s) or - Used Aerosol Can(s)
Accumulation Time Limits	One Year. Must be able to demonstrate the length of time that the UW has been accumulated from the date it becomes a waste or was received from another handler.				

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Allowed Activities		<p>As long as the casing of each individual battery cell is not breached and remains intact and closed (except that cells may be opened to remove electrolyte but must be immediately closed after removal) the following activities are allowed:</p> <ul style="list-style-type: none"> - Sorting batteries by type, - Mixing battery types in one container, - Discharging batteries so as to remove the electric charge, - Regenerating used batteries, - Disassembling batteries or battery packs into individual batteries or cells, - Removing batteries from consumer products, or - Removing electrolyte from batteries. <p>Specific requirements for removing electrolyte from batteries from universal waste handlers that generate solid waste from batteries (40 CFR 273.13(a)(3)).</p>	<p>May remove mercury-containing ampules from UW mercury-containing equipment provided the handler meet conditions in 40 CFR 273.13(c)(2), (3) and (4).</p>		<p>As long as each individual aerosol can is <u>not breached</u> and remains intact the following activities are allowed:</p> <ul style="list-style-type: none"> - Sorting aerosol cans by type, - Mixing intact cans in one container, and - Removing actuators to reduce the risk of accidental release. <p>Specific requirements apply to universal waste aerosol cans that are punctured and drained (40 CFR 273.13(e)(4) or 40 CFR 273.33(e)(4)).</p>
Employee Training	<p><u>For Small Quantity Handlers of UW</u> (<5,000 kg total UW at any time): Must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.</p> <p><u>For Large Quantity Handlers of UW</u> (≥5,000 kg total UW at any time): Must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.</p>				
Notification	<p><u>For Small Quantity Handlers of UW</u> (<5,000 kg total UW at any time): Not required to notify of universal waste activity.</p> <p><u>For Large Quantity Handlers of UW</u> (≥5,000 kg total UW at any time): Required to notify (electronically using RCRAInfo) of universal waste activity and receive an EPA ID number.</p>				

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Off-Site Shipments	<ul style="list-style-type: none"> - Must send/take universal waste to another universal waste handler, a universal waste destination facility or a foreign destination. - If the UW handler self-transportes UW off-site, the handler becomes a UW transporter for those self-transportation activities and must comply with the transporter requirements in 40 CFR 273 Subpart D while self-transporting the UW. - Shipments of UW must comply with applicable requirements of 49 CFR 171 through 180. - Additional Off-Site Shipments requirements are in 40 CFR 273.18(d) through (h) and 40 CFR 273.38(d) through (h). 				
Tracking Universal Waste Shipments	<p><u>For Small Quantity Handlers of UW</u> (<5,000 kg total UW at any time): Not required to keep records of shipments of universal waste. (However it is highly recommended).</p> <p><u>For Large Quantity Handlers of UW</u> (≥5,000 kg total UW at any time): Must keep a record of each shipment received at the facility, each shipment of UW sent from the handler to other facilities (in the form of a log, invoice, manifest, bill of lading, movement document or other shipping document). Required information is described in 40 CFR 273.39. Records must be maintained for at least three years.</p>				
Prohibited Activities	<p>UW handlers are prohibited from disposing of universal waste and from diluting or treating universal waste (except by responding to releases as provided in 40 CFR 273.17 and 273.37) or by managing specific wastes as provided in 40 CFR 273.13 and 273.33.</p>				