



RCRA Universal Wastes

Resource Conservation & Recovery Act (2-page fact sheet)

For more information on universal wastes see *40 CFR Part 273*.

To encourage and facilitate recycling, the EPA's universal waste regulations streamline hazardous waste management standards for federally designated "universal wastes". The universal waste program provides an alternative set of regulations that reduce the regulatory burden by allowing longer storage of these wastes and reduced recordkeeping.

The four main types of universal wastes are:

1. hazardous waste batteries
2. hazardous waste pesticides
3. hazardous waste lamps (e.g. fluorescent bulbs)
4. mercury containing equipment

To be covered under the universal waste program, these items must first be identified as hazardous waste. Items that still have product value and that are still being used are not wastes and, therefore, are not subject to RCRA.

Under the regulation there are four categories of entities that deal with universal wastes:

1. Universal Waste Handlers
 - a. Small Quantity Handlers of Universal Waste (SQHUW) accumulate < 11,000 lbs. Basic training on proper handling and emergency procedures is required. Storage time 1 year.
 - b. Large Quantity Handlers of Universal Waste (LQHUW) accumulate 11,000 lbs. or more. Documentation of shipment, obtain EPA id number, and employee training requirements. Storage time 1 year.
2. Universal Waste Transporters
 - a. EPA manifest not required during transport
 - b. Department of Transportation (DOT) requirements do apply
3. Universal Waste Destination Facilities
 - a. Treat, dispose of, or recycle
 - b. Requirements are same as for a fully regulated hazardous waste Treatment, Storage, Disposal Facility (TSDF).

Labeling Requirements

Batteries – Each battery or container in which the batteries are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"

Pesticides – A container, tank, transport vehicle, or vessel must be labeled or marked clearly with:

- The original pesticide label, and
- The words “universal waste pesticide” or “waste pesticide”

Lamps – A universal waste lamp is defined as the bulb or tube portion of an electric lighting device (e.g. fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps).

- Lamps must be stored intact, unbroken, in containers whereby if a bulb were to break the container would be sufficient to completely and securely contain the bulbs.
- The container must be marked with the words “universal waste lamps” or “waste lamps”

Mercury Containing Equipment – A device or part of a device (including thermostats, but excluding batteries and lamps) that contain elemental mercury integral to its function.

- Contained in a closed, structurally sound container that is designed to prevent the escape of mercury into the environment by volatilization or other means
- Mercury clean up system in place
- Employees trained in mercury handling and emergency procedures
- Label each device or container in which the mercury devices are contained with any one of the following phrases: "Universal Waste Mercury Containing Equipment" or "Waste Mercury Containing Equipment" or "Used Mercury Containing Equipment"
- For thermostats, label must read: "Universal Waste Mercury Thermostat" or "Waste Mercury Thermostat" or "Used Mercury Thermostat"