

Universal Waste Rules



Dan Sowry

Office of Compliance Assistance & Pollution Prevention

Central District Office

Ohio EPA

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What We Will Cover



- Background information
- Types of universal waste
- Handler categories
- Green-tipped light bulbs
- Crushing light bulbs
- Packaging
- Notification
- Labeling
- Storage
- Manifesting
- Transportation
- Recordkeeping



Background



- **What are the universal waste rules?**
 - Subset of hazardous waste regulations
 - Intended to promote recycling
 - Eases certain regulatory requirements
- **What determines a universal waste (UW)?**
 - Must be a hazardous waste
 - Must be widespread
 - Commonly found in medium to large volumes
 - Exhibit low-level hazards
 - Must be easily managed
 - Generated by numerous businesses



Types of Universal Waste



- **Hazardous waste pesticides**
 - Recalled or suspended under FIFRA
- **Mercury-containing devices**
 - Includes all mercury-containing devices
- **Discarded batteries**
 - Alternative option for lead acid batteries
- **Light bulbs**
 - Includes incandescent, fluorescent, compact fluorescent, LED, high intensity discharge, neon, high pressure sodium, etc.



What about those “green” light bulbs?



- They still contain mercury
 - regulatory level 0.2 mg/L
- We encourage recycling rather than disposal
- If disposed, must evaluate and retain documentation for three years



Who are the UW handlers?



- **UW Handlers are persons who**
 - **Generate**
 - **Receive**
 - **Store (but do not treat, dispose of or recycle UW generated elsewhere)**
 - **UW handlers cannot treat, dispose of or recycle UW**



What are the UW handler categories?

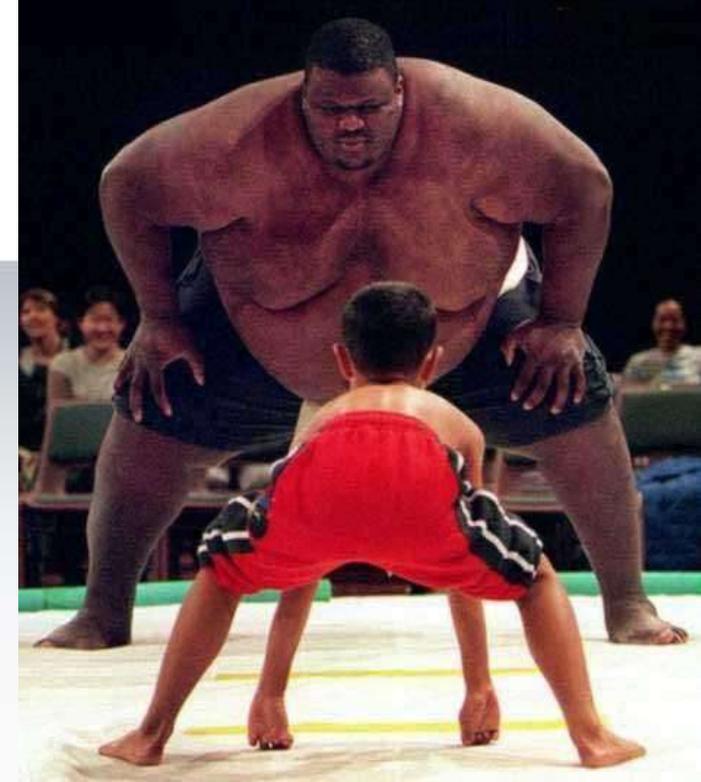
- **Two categories:**

- **Small quantity handlers**

- Accumulates on-site less than 5,000 kilograms (11,023 pounds) of UW (not by type) at any time.

- **Large quantity handlers**

- Accumulates on-site more than 5,000 kilograms (11,023 pounds) of UW (not by type) at any time.



Who are the UW Destination Facilities?



- **UW Destination Facilities**
 - Permitted hazardous waste treatment, storage and disposal facilities (TSDFs)
 - They can:
 - Receive
 - Store
 - Treat
 - Recycle and/or Dispose of Universal Waste

Commercial Facilities Accepting Hazardous Waste

- epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=29

Where do I send my UW?



- **Another UW handler**

- www.epa.ohio.gov/portals/32/pdf/comp.lamp.ballast.list.pdf

OR

- **Permitted UW destination facility**

- A facility permitted to treat, dispose of or recycle your UW

Where do I send my UW?



- Don't do this...



Or this...



Do I count my UW towards my hazardous waste generator category?



No

UW does not count towards your hazardous waste category.

**** do not confuse these categories with the hazardous waste generator categories (Conditionally Exempt Small Quantity Generator, Small Quantity Generator, or Large Quantity Generator)**

Am I required to notify Ohio EPA of my UW activities?



- **Small quantity handlers are NOT required to notify Ohio EPA or to obtain a U.S. EPA identification number**
- **Large quantity handlers ARE required to notify and obtain a U.S. EPA identification number (unless you already have one)**
 - **epa.ohio.gov/dmwm/Home/Notiform.aspx**

What are the packaging requirements for UW?



Batteries

- only required if leaking

Mercury-Containing Devices, Light Bulbs and Pesticides

- place in closed container
- must be designed to contain potential releases
- broken or damaged light bulbs can be sent to a permitted facility

- **Warning about mercury...**



Can I use a crusher to crush my light bulbs?



- **UWR prohibits handlers from crushing light bulbs**
- **If you crush your bulbs, you must manage them under the hazardous waste requirements**

What are the labeling requirements for UW?



- Each category of UW must be clearly marked with the appropriate wording
 - For example: “Universal Waste Lamps;” “Waste Lamps;” or “Used Lamps”
- Be able to demonstrate accumulation time



How long can I accumulate UW?



- Up to one year on-site regardless of your handler category
- If greater than one year is required, you must be able to prove why it is necessary



Do I manifest my UW?



NO

- UW handlers are not required to manifest off-site shipments of UW
- UW handlers, however, must ensure delivery to another UW handler or to a permitted destination facility



Can I transport my own UW?



YES

- deliver only to another UW handler or to a permitted UW destination facility
- must follow all DOT requirements
 - Check with Public Utilities Commission of Ohio
 - 800-866-7826
- responsible for spills and clean up



Can I take or send my UW to any recycler?



No

UW handlers must ensure delivery to another UW handler or to a permitted destination facility



What are my recordkeeping requirements?



- **No recordkeeping requirements for small quantity handlers of UW**
- **Large quantity handlers of UW must retain on- and off-site shipment records for at least three years**
 - **Name and address**
 - **Quantity of each type of UW**
 - **Date of shipment**



UW Fact Sheets



- **Universal Waste Rule Guidance Document**
 - epa.ohio.gov/portals/32/pdf/New_Universal_Waste_Guidance.pdf
- **Universal Waste Webpage**
 - epa.ohio.gov/dmwm/Home/universalwaste.aspx
- **Universal Waste Handler Requirements Summary Table**
 - epa.ohio.gov/portals/32/pdf/UniversalWasteRequirementsTable.pdf
- **Fluorescent Light Bulb Management Webpage**
 - epa.ohio.gov/dmwm/Home/HWFluorescentLamps.aspx



Questions?

OCAPP: 1-800-329-7518

Free and confidential hotline

Dan Sowry

Central Ohio OCAPP Representative

614-728-8575

dan.sowry@epa.ohio.gov

