

UNITED SAFETY SOLUTIONS

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826 Bloom Rd
Eagle River, WI 54521

UNIVERSAL WASTE REQUIREMENTS

OSHA Universal Waste Requirements
Course: Hours Instruction
Hours: Class Room
Hours: Field Instruction

Regulation 40 CFR 273
Prerequisites:
Fee:
CE Credits:

Universal Waste (UW) is a general descriptive term used to describe wastes that are generated by a large, diverse population. Businesses as well as unregulated households generate UW. This term is intended to be broad so that a wider range of wastes may be managed under the reduced requirements of the UWR which is intended to promote recycling as well as the proper disposal of wastes (if recycling is not a viable option by easing certain regulatory requirements). The UWR's reduced management requirements will encourage UW collection programs including the collection of household waste and will keep these wastes out of the municipal waste streams.

Determining whether a waste is a characteristic waste is only one step in the process of hazardous waste identification. The U.S. Environmental Protection Agency (EPA) regulations under the Resource Conservation and Recovery Act (RCRA) require that any person who produces or generates a waste must determine if that waste is hazardous.

Federally, universal waste regulations apply to four types of hazardous waste. If a waste is determined to be hazardous by the generator and is classified as either: **battery, pesticide, mercury-containing equipment, or lamp**, it may be managed within the relaxed management standards of 40 CFR 273 which classifies facilities that generate or store universal wastes as "handlers." There are two classifications of handlers based on the quantity of universal waste accumulated.

Small Quantity Handlers:

Accumulate less than 5,000 kg of universal waste at any one time

Large Quantity Handlers:

Accumulate 5,000 kg or more of universal waste at any one time

The management requirements for small and large quantity handlers include:

- **Treatment and disposal:** Handlers of universal waste may not treat or dispose of waste.
- **Accumulation:** Universal waste must be managed in a way that prevents releases to the environment. Containers must be in good condition and kept closed.
- **Storage:** Handlers must send universal waste to approved destination facilities, foreign destinations, or to other handlers within one year of waste accumulation. Handlers must mark, label, or use some other method to document that the universal waste has not been accumulated on-site for longer than one year.

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- **Labels:** Universal waste or the containers in which they are accumulated must be labeled or marked clearly with the following:
 - Universal waste – type (i.e., batteries, lamps)
 - Waste – type (i.e., batteries, lamps)
 - Used – type (i.e., batteries, lamps)
- **Releases:** Handlers must immediately contain all releases of universal waste and handle the cleanup of residues appropriately. If the release residue meets the definition of regulated hazardous waste, it must be managed as fully regulated hazardous waste.
- **Training:** Large quantity handlers must ensure that their employees are thoroughly familiar with proper waste handling and emergency response procedures related to their universal waste responsibilities. Small quantity handlers must inform their employees of the handling and emergency response procedures related to their universal waste responsibilities.
- **Transportation:** Hazardous waste manifests are not required for universal waste shipments, but if universal waste meets the definition of a DOT hazardous material it must be shipped in compliance with all DOT requirements.

Large Quantity Handler of Universal Waste (LQHUW)

- This handler manages any of the three types of UW.
- Collects greater than or equal to 5,000 kg. of total accumulation of UW at any one given time, not by each type.
- May receive UW from other handlers and foreign destinations.
- May store UW on-site for up to one year. If greater than one year is needed, the handler must prove that the UW has a feasible recycling market.
- Must record all shipments received or shipped. Logs, invoices, bills of lading, manifests, or other shipping documents constitute acceptable forms of records which must be maintained for at least three years. The shipping / receiving records should include:
 - The name and address of the originating UW handler or foreign shipper from whom the UW was sent
 - The quantity of each type of UW received
 - The date of receipt of the shipment of UW

In addition to the above requirements, large quantity handlers must notify the EPA regional administrator (or authorized state environmental agency) and receive an EPA ID number before accumulating 5,000 kg of universal waste at any one time.

Small Quantity Handler of Universal Waste (SQHUW)

- This handler manages any of the three types of UW
- Collects less than 5000 kg. of the total accumulation of UW at any one given time, not by each type
- May receive UW from other handlers and foreign destinations
- May store UW on-site for up to one year. If greater than one year is required, the handler must prove that the UW has a feasible recycling market.

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- This handler must inform all employees that manage UW of proper handling and emergency procedures appropriate to the type(s) of UW handled at the facility.
- Manifests are not required for all handlers of UW and they are not required to keep records.

Who Should Take This Course:

Handlers of Universal Wastes; Recycle Facility Operators

Course Objectives:

Safe transportation and disposition of universal waste, for hazardous transport and storage and to encourage efforts to recycle waste.

United Safety Solutions Course Covers:

- Large Quantity Handler of Universal Waste (LQHUW)
- Small Quantity Handler of Universal Waste (SQHUW)
- Destination Facility
- Transfer Facility
- Transporter
- Prohibitions
- Notification
- Waste management
- Labeling/marking
- Accumulation time limits
- Employee training
- Response to releases
- Off-site shipments
- Tracking universal waste shipments
- Exports
- Land Disposal Restrictions (LDRs)
- Packaging & Labeling
- Containers

Certification:

Successful completion requires 80% on both classroom and practical skills.

Upon successful completion, participants receive a wallet card, documentation to satisfy OSHA.