

FACT SHEET



FS No. 37-083-0321

UNIVERSAL WASTE MANAGEMENT

Disclaimer. The following information is based on Federal criteria; State and military installation regulations may be more stringent. This information does not apply to hazardous wastes (HW) generated in foreign nations. Check DoD Manual 4715.05-G, *Overseas Environmental Baseline Guidance Document: Conservation* or applicable host nation Final Governing Standards for HW management requirements.

1. BACKGROUND.

The EPA's universal waste (UW) regulations streamline HW management standards for Federally designated "universal wastes," which include batteries, pesticides, mercury-containing equipment, lamps, and aerosol cans.

The UW regulations govern the collection and management of these widely generated wastes; thus facilitating environmentally sound collection and proper recycling or treatment. They ease the regulatory burden on small businesses and others that wish to collect these wastes and encourage the development of municipal and commercial programs to reduce the quantity of these wastes going to municipal solid waste landfills or combustors. In addition, the regulations ensure that the wastes subject to this management system will go to appropriate treatment or recycling facilities pursuant to the full HW regulatory controls.

The Federal UW regulations are set forth in 40 Code of Federal Regulations (CFR) Part 273. Authorized States can modify the UW rule and add additional waste(s) in their individual State regulations. Authorized States also do not have to adopt this less stringent Federal program. Always check with your supporting installation environmental office and State environmental regulatory agency for specific requirements.

2. FEDERAL UNIVERSAL WASTES.

Batteries: All batteries that are HW may be managed as UW, including nickel cadmium batteries. This also includes lead-acid batteries that are currently regulated under Subpart G of 40 CFR Part 266, *Spent Lead-Acid Batteries Being Reclaimed*. Handlers have the option of managing lead-acid batteries under the existing CFR requirements or the UW rules.

Pesticides: This includes unused HW pesticides that have been recalled, suspended, or canceled under the Federal Insecticide, Fungicide, and Rodenticide Act, and unused pesticides that are collected for discard.

Mercury-Containing Equipment: This includes devices containing mercury such as thermometers, manometers, barometers, and thermostats.

U.S. Army Public Health Center, Environmental Health Sciences Division
8252 Blackhawk Road, APG, MD 21010
410-436-3651 or DSN 584-3651

Approved for public release; distribution unlimited
Use of trademarked name(s) does not imply endorsement by the U.S.
Army but is intended only to assist in identification of a specific product.

Lamps: This includes all waste lamps that exhibit HW characteristics such as fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium, and metal halide lamps.

Aerosol Cans: This is the most recent addition to the Federal UW rule; the final rule becoming effective on 7 February 2020. Contact your supporting installation environmental office to determine whether HW aerosol cans are managed as UW at your location.

3. CONTAINER REQUIREMENTS.

UW must be managed to prevent release of the UW or a component of it to the environment. Any UW that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions must be placed in a container that remains closed, structurally sound, compatible with the UW, and lacks evidence of leakage, spillage, or damage.

4. LABELING REQUIREMENTS.

Each UW or container holding the UW must be labeled with the following words:

- "Universal Waste - Battery(ies)," "Used Battery(ies)," or "Waste Battery(ies)."
- "Universal Waste - Lamp(s)," "Used Lamp(s)," or "Waste Lamp(s)."
- "Universal Waste – Aerosol Can(s)," "Used Aerosol Can(s)," or "Waste Aerosol Can(s)."
- "Universal Waste – Mercury Containing Equipment," "Used Mercury Containing Equipment," or "Waste Mercury Containing Equipment."
- "Universal Waste – Pesticide(s)" or "Waste Pesticide(s)" and the original product label.

5. STORAGE REQUIREMENTS.

UW may be accumulated for up to 1 year from the date it was first generated. A mechanism must be in place to demonstrate how long the UW has been stored. To determine this, date the container holding the UW or each individual item, or maintain an on-site inventory system. Check with the environmental office on how long the UW may be stored at your location before it has to be turned in for disposal as the 1-year period includes the turn-in processing time.

6. TRAINING REQUIREMENTS.

UW handlers must have training on proper waste handling and emergency procedures appropriate to the type(s) of UW handled at the facility.

7. RECORD KEEPING REQUIREMENTS.

Large quantity handlers of UW (accumulate more than 5,000 kg of UW at any time) must keep records of UW shipments for a minimum of 3 years. The record can take the form of a log, manifest, invoice, or other shipping document. Small quantity handlers (accumulate less than 5,000 kg of UW at any time) are not required to keep records of shipments of UW.
