

Hazardous Waste Management

Management of Universal Waste

Information presented in this fact sheet is intended to provide a general understanding of the regulatory requirements governing the management of universal waste. This information is not intended to replace, limit, or expand upon the complete regulatory requirements found in Division 14 of the Alabama Department of Environmental Management Administrative Code.

BACKGROUND

What are *Universal Wastes*? Universal wastes are categories of hazardous wastes that are generated at many types of facilities and in many settings. The following hazardous wastes can be managed under the universal waste rules: batteries, pesticides, mercury-containing equipment, lamps, and aerosol cans.

The universal waste rules, found in ADEM Admin. Code 335-14-11, are a simplified set of standards that still allow generators (also called “Universal Waste Handlers”) to manage these wastes safely.



WHAT ARE THE SAFETY AND ENVIRONMENTAL CONCERNS FOR UNIVERSAL WASTE?

Universal wastes are hazardous for at least one constituent; some have multiple hazardous constituents. Hazards can include toxic metals (mercury or lead, for example), corrosive liquids (battery acid), hazardous or toxic compounds, or ignitable compressed gases. If a waste is not a hazardous waste, it cannot be a universal waste.

ARE THERE ANY UNIVERSAL WASTE PROHIBITIONS?

Lamps that are broken, crushed, or otherwise no longer intact are solid wastes subject to a hazardous waste determination; these may not be managed as universal waste. A handler may not dispose of universal waste, and may not dilute or treat universal waste except when responding to releases.

HOW IS UNIVERSAL WASTE REGULATED?

There are two classes of universal waste handlers:

- A large quantity handler of universal waste is one who accumulates 5,000 kilograms (11,000 pounds) or more total of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time. A large quantity handler is required to have an EPA identification number and must notify the Department of their universal waste handling activities.
- A small quantity handler is one who accumulates less than 5,000 kilograms of universal waste at any time. A small quantity handler is not required to notify the Department of their universal waste handling activities.

The universal waste rules allow for longer accumulation times, simplified packaging and marking requirements, and the ability to ship the waste without preparing a hazardous waste manifest. They were developed to simplify management of commonly generated wastes, encourage recycling or reclamation, and avoid improper disposal of the wastes. In addition, universal waste is not counted against a facility’s hazardous waste generator status.

Although the rules are simplified, universal waste must still be managed to prevent the release to the environment. Containers or packages must be structurally sound, adequate to prevent breakage, and compatible with their contents. Each item or container must be marked with one of the phrases specified in Division 14, Chapter 11. Universal waste may be accumulated for up to one year; an extension to that time may be requested for the purpose of accumulating sufficient quantities to facilitate proper recovery, treatment, or disposal. You must be able to demonstrate the length of

time that the universal waste has been accumulated. Employees that handle universal waste must receive some training on the proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.

WHERE CAN I SEND MY UNIVERSAL WASTE?

You can send universal waste directly to a “Destination Facility”, a facility that treats, disposes of, or recycles a particular category of universal waste; you may also send it to another universal waste handler. If you are a large quantity handler, you must keep records of each shipment received at or sent from your facility for three years.

WHERE CAN I GET ADDITIONAL INFORMATION?

On-line Resources:

Alabama Department of Environmental Management: <http://www.adem.alabama.gov>

ADEM Administrative Code Division 14 - <http://www.adem.alabama.gov/alEnviroRegLaws/files/Division14.pdf>

ADEM Guidance - <http://www.adem.state.al.us/programs/land/guidanceReports.cnt>:

Hazardous Waste Determination

Notification of Regulated Waste Activity

RCRA Small Quantity Generator Handbook Used Oil Management Handbook

U. S. Environmental Protection Agency: <http://www.epa.gov>



Telephone Resources:

Hazardous Waste Compliance Inspectors • • • 334-271-7730

