

# Universal Waste – Small Quantity Handler Audit

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## **References**

Subpart 374-3 Standards for Universal Waste <http://www.dec.ny.gov/regs/4378.html>

DEC Guidance: Fluorescent and HID Lamps <http://www.dec.ny.gov/chemical/8787.html> (includes discussion about lamp crushers, FAQ #5)

Related: Mercury Added Consumer Products Law <http://www.dec.ny.gov/chemical/8853.html>

## **Universal Waste Rule**

To streamline environmental regulations for wastes generated by numerous sources in relatively small quantities, USEPA issued the Universal Waste Rule in 1995. This rule is designed to reduce the amount of hazardous waste in the municipal solid waste stream, to encourage the recycling and proper disposal of some common hazardous wastes and to reduce the regulatory burden on generators. For hazardous waste lamps, this rule has been available for use in New York State since January 6, 2000.

Universal wastes include such items as **hazardous batteries, hazardous mercury-containing thermostats, certain pesticides, and hazardous lamps**. Universal wastes are generated not only in the industrial settings usually associated with hazardous wastes, but also in a wide variety of other settings, including households, schools, office buildings, and medical facilities. Although handlers of universal wastes must meet less stringent standards for storing, transporting, and collecting wastes, the wastes must comply with full hazardous waste requirements for final recycling, treatment, or disposal. This approach helps to remove these wastes from municipal landfills and incinerators, providing stronger safeguards for public health and the environment.

**Small Quantity Handlers of Universal Waste** (less than 5,000 kg or 11,000 lbs of total universal wastes, including hazardous batteries, certain hazardous pesticides, hazardous thermostats, or hazardous lamps, calculated collectively, on site at any time): Requirements include packaging in a way to minimize breakage; immediately cleaning up any leaks or spills; and properly labeling containers.

*SQHs are restricted in how they can manage the waste (e.g., removing battery electrolyte solutions or mercury ampoules from thermostats). Please see 374-3.2(d) for restrictions.*

*SQHs are **not** required to notify the EPA or DEC of their universal waste handling activities.*

**Large Quantity Handlers of Universal Waste** (5,000 kg or 11,000 lbs or more of total universal wastes on site at any time): Requirements include EPA notification; packaging in a way to minimize breakage; immediately cleaning up any leaks or spills; properly labeling containers; and complying with record keeping and reporting requirements.

**Universal Waste Transporters**: Requirements include meeting applicable DOT standards; complying with record keeping and reporting requirements; and complying with applicable requirements of 6 NYCRR Part 364 if transporting more than 500 lbs of total universal waste in any shipment. Common carriers can transport up to 500 lbs of universal waste in any shipment.

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CAMPUS				
AUDITED ACTIVITIES				
DATE				
	<b>YES</b>	<b>NO</b>	<b>NA</b>	<b>NOTES</b>
Are wastes managed to prevent releases to the environment?				
Are wastes in containers? (Batteries and thermostats are not required to be stored in containers unless they show evidence of leakage, spillage or damage.)				
Are containers closed?				
Are containers structurally sound, adequate to prevent breakage, compatible with the contents?				
Do the containers show any evidence of leakage, spillage or damage that could cause leakage under foreseeable conditions?				
Are batteries collected in a manner to minimize fire risk and risk of unexpected discharge?				
Are containers labeled one of: <i>Universal Waste – XXXX</i> <i>Waste XXXX</i> <i>Used XXXX</i> where XXXX= lamps, batteries, pesticides, or mercury thermostats?				
Is any waste accumulated for more than one year or is adequate documentation available to support longer time period? (A handler can demonstrate that the longer accumulation time is required to generate a quantity sufficient to facilitate proper recovery, treatment or disposal.)				
Is the accumulation time demonstrated by labeling the container; labeling the individual item; maintaining a clear inventory; placement in a specific storage area marked with earliest date; or other?				

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	YES	NO	NA	NOTES
Has there been a release in the past 3 years?				
Was the release addressed immediately?				
Has the waste from the clean up been managed in compliance with all regulations?				
Have all employees who handle or have responsibility for managing universal waste been informed of proper handling and emergency procedures for the universal waste? Is such training adequately documented?				
Are cleanup procedures well documented and available for review?				
Are broken lamps immediately cleaned up and placed in appropriate containers, and then handled as hazardous waste?				
Has waste been shipped off site? (Note: SQHs are not required to keep records of shipments of universal waste.)				
Has waste only been sent to another universal waste handler or destination facility?				
If so, was an authorized transporter, with a Part 364 permit, used for all shipments?				
Prior to shipment, did the universal waste handler or destination facility agree to take the waste?				
If the waste was rejected, did the originator of the shipment accept return of the waste?				
<b>Notes/Comments</b>				
<b>Date:</b>				
<b>Auditor:</b>				