

HAZARDOUS MATERIALS PROGRAM ENVIRONMENTAL FACT SHEET

Universal Waste

What is Universal Waste?

A universal waste meets hazardous waste criteria but may be managed under alternative standards, because it poses a low risk relative to other hazardous wastes and is generated by a wide variety of businesses.

Although universal wastes are managed under alternative standards from the hazardous waste regulations of Subchapters 1 through 7 of the Vermont Hazardous Waste Management Regulations (VHWMR), they must be managed according to the Subchapter 9 Universal Waste Management Standards. Wastes that can be managed as universal waste in Vermont include **certain batteries, pesticides, thermostats, PCB-containing fluorescent light ballasts, lamps** (e.g., fluorescent bulbs), **mercury-containing devices** (e.g., mercury switches), **cathode ray tubes** (e.g., color computer monitors and TV screens), **postconsumer paint**, and **aerosol cans** that would otherwise have to be managed as hazardous waste.

The Universal Waste Management Standards include requirements that apply to small and large quantity “handlers” of universal waste (including specific management standards for each category of universal waste), “universal waste transporters,” and “destination facilities.” However, since most of the Vermont businesses that manage universal waste fall into the “small quantity handler” category, this fact sheet focuses primarily on those requirements.

What is a Small Quantity Handler?

A “**universal waste handler**” is defined as:

- 1) *A generator of universal waste; or*
- 2) *The owner or operator of a facility, including all contiguous property, that receives universal waste from other universal waste handlers, accumulates universal waste, and sends universal waste to another universal waste handler, to a destination facility, or to a foreign destination.*

A “**small quantity handler**” is defined as:

A universal waste handler who accumulates less than 5,000 kilograms (11,000 pounds) total of universal waste other than CRTs (batteries, pesticides, thermostats, ballasts, lamps, or mercury-containing devices, postconsumer paint, or aerosol cans, calculated collectively), and who accumulates less than 36,288 kilograms (40 tons) of CRTs, at any time.

What does a Small Quantity Handler need to comply with?

Although **each category of universal waste has unique waste management requirements** (individual fact sheets are available for lamps, mercury-containing devices, and CRTs), small quantity handlers must manage all universal wastes according to the following general requirements:

- Manage universal wastes in a way that prevents breakage and releases to the environment.

- Keep containers of universal waste closed.
- Immediately contain and transfer any universal wastes that show evidence of leakage or damage to an appropriate container.
- Meet waste-specific container or packaging requirements.
- Protect containers of universal waste from precipitation.
- Label or mark the universal waste (or container holding the universal waste) to indicate that it is a waste or universal waste. For example, universal waste lamps should be marked as “Universal Waste Lamps,” “Waste Lamps,” or “Used Lamps.”
- Accumulate universal waste for no longer than one year (a handler must be able to demonstrate the length of time that a universal waste has been accumulated from the date it became a waste or is received).
- Ensure that employees handling universal waste are familiar with proper handling and emergency procedures, relative to their responsibilities.
- In the event of a release of universal waste, comply with the emergency actions and reporting requirements of VHWMR Section 7-105(a), and determine if any material resulting from the release is hazardous waste.

Where can Small Quantity Handlers bring Universal Waste?

Small quantity handlers can bring their universal wastes to another universal waste handler or a destination facility (which, in general, is defined as *a facility that treats, disposes of, or recycles a particular category of universal waste*). Small quantity handlers may also send universal waste to a foreign destination provided the specific export requirements of VHWMR Section 7-912(k) are met.

Who can Transport Universal Waste?

Small quantity handlers can either self-transport their own universal waste or hire a commercial transporter. Anyone that transports universal waste must comply with applicable Department of Transportation (DOT) requirements and, if using a vehicle with a gross vehicle weight greater than one ton, with the solid waste permit requirements of 10 V.S.A. § 6607a. No hazardous waste manifest shipping document is required for the transport of universal waste.

For more information regarding universal waste, or if you have other hazardous waste management questions, please contact:

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