

Universal Waste Rules

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Ohio EPA, DERR
Hazardous Waste Compliance
Assurance Section



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Universal Waste Rules

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**It's Poll
Time**



POLL

Are you currently wearing pajamas?

- a) No, all business all the time
- b) PJs all day
- c) Corporate on top, PJs on the bottom
- d) Casually cool

Please choose one multiple choice answer

Topics We Will Cover



Background Information

Types of Universal Waste

Universal Waste Handlers

Universal Waste Transporters

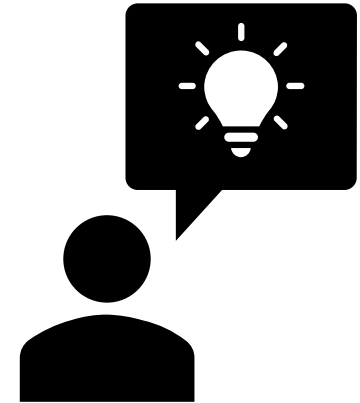
Universal Waste Destination Facilities

Resources

Background

How does a hazardous waste become a universal waste (**UW**)?

- Must be a hazardous waste
- Commonly found in medium to large volumes
- Exhibit low-level hazards
- Must be easily managed
- Generated by numerous businesses



Universal Waste Rules

Advantages

Do not count toward your HW generator status

Waste evaluation is not required

Recycling encouraged (but not required)

No hazardous waste manifesting required (DOT rules apply)

HW transporter is not required

Types of Universal Waste



Discarded batteries

- Alternative option for lead acid batteries under 3745-266-80



Hazardous waste pesticides

- Recalled or suspended under FIFRA



Mercury-containing devices

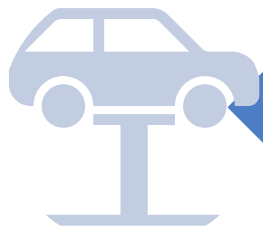
- Includes all mercury-containing devices



Lamps

- Includes incandescent, fluorescent, compact fluorescent, LED, high intensity discharge, neon, high pressure sodium, etc.

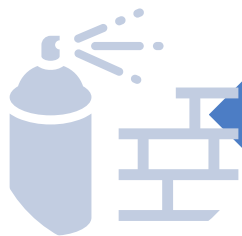
Types of Universal Waste Ohio-Specific



Antifreeze

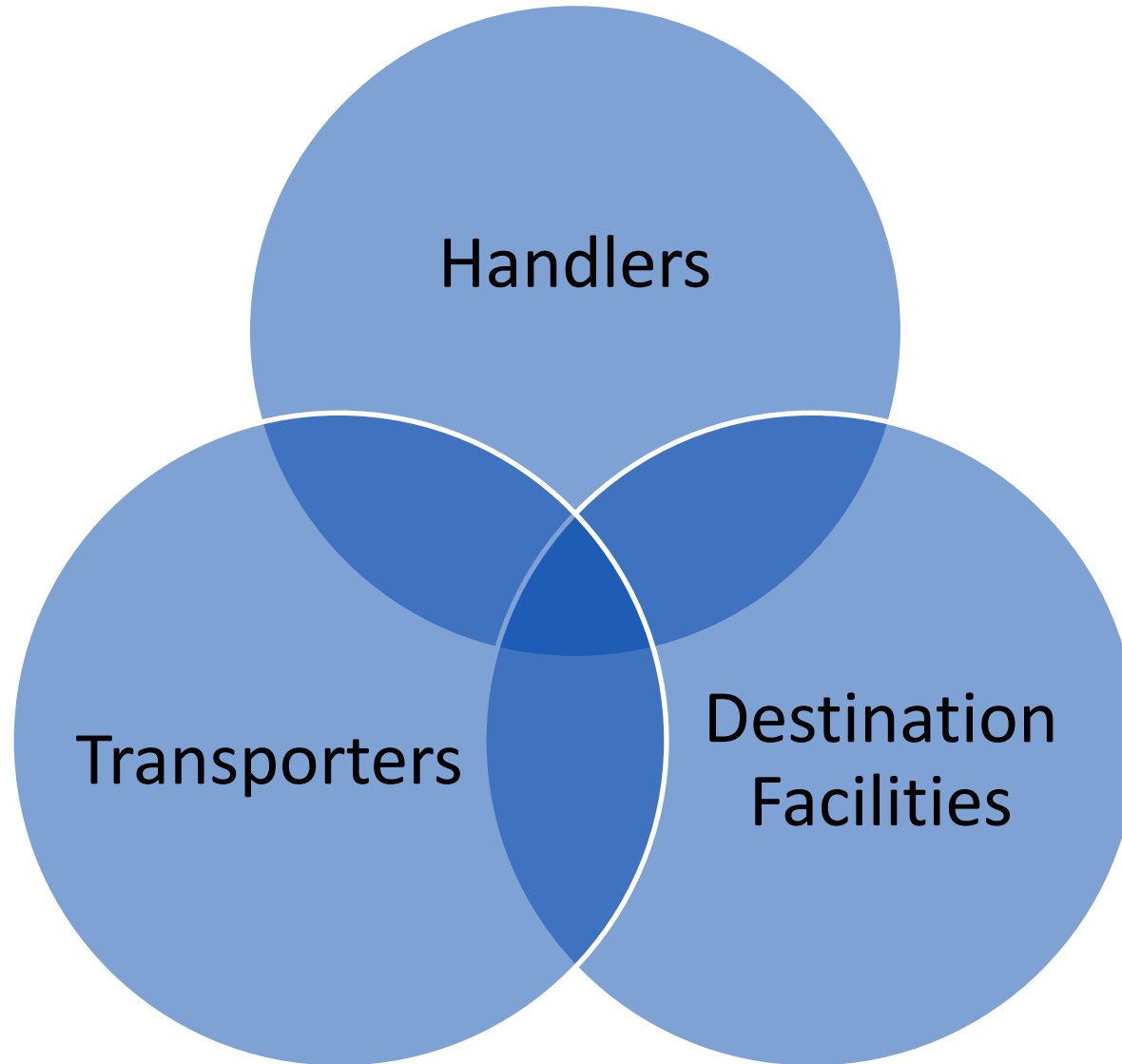


Paint/Paint-Related Waste

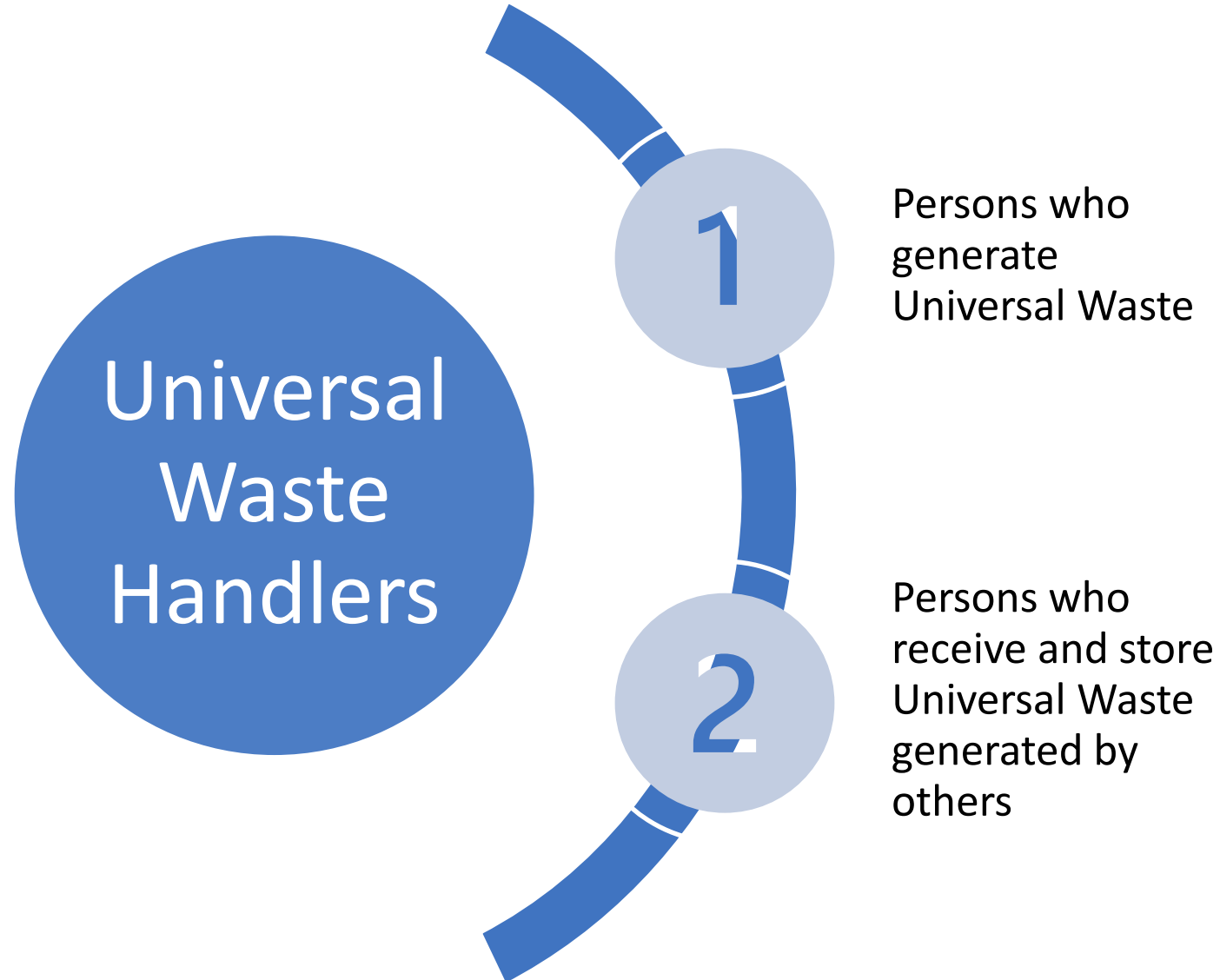


Aerosol Containers

Universal Waste Entities



Universal Waste Entities-Handlers



Universal Waste Entities-Handlers

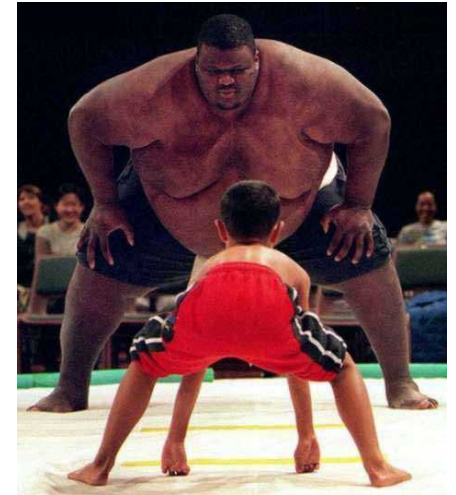
Two categories:

– Small quantity handlers

- Accumulate on-site less than 5,000 kilograms (11,000 pounds) of UW at any time (not by type).

– Large quantity handlers

- Accumulate on-site more than 5,000 kilograms (11,000 pounds) of UW at any time (not by type).
- *ex. Paint waste would be approximately 22 drums.*
- *T4 bulbs about 33 lbs./box approximately 333 boxes.*



Universal Waste Handlers

Notification Requirement

- Small quantity handlers are not required to notify Ohio EPA of their universal waste handling activities.
- Large quantity handlers ARE required to notify and obtain a [U.S. EPA identification number](#) (unless you already have one).
- Destination facilities are required to have a TSD permit.



**It's Poll
Time**



POLL

Which of the items below cannot be managed as a universal waste?



Please choose one multiple choice answer

POLL

- a) Fluorescent bulbs
- b) Lithium-ion batteries
- c) Used aerosol cans
- d) Used oil

Universal Waste Handlers

Accumulation Requirements Containers

- Closed except when adding/removing waste
- Structurally sound
- Compatible with the waste
- Lack evidence of leaks, spillage, or damage that could cause leakage
- Properly labeled

Universal Waste Handlers

Accumulation Requirements Tanks

Comply with OAC rule 3745-52-16(B)(3)

- Small Quantity Handler
 - Antifreeze
 - Paint/Paint-related waste
- Large Quantity Handler
 - Antifreeze

Comply with OAC rules 3745-66-90 to 99 (except 66-97(C))

- Small Quantity Handler
 - Pesticides
- Large Quantity Handler
 - Pesticides
 - Paint/Paint-related waste

Universal Waste Handlers

Accumulation Requirements

Time limits

- One year from the date the Universal Waste is generated or received from another handler
- Aerosol containers-satellite accumulation area provision
- Demonstrate length of time of accumulation

Universal Waste Handlers

Labeling and Marking Requirements

- A handler of Universal Waste shall label or mark the universal waste to identify the type of Universal Waste
- Batteries, lamps, mercury containing equipment, and pesticides
- Aerosol containers
- Paint and paint-related wastes
- Antifreeze

Universal Waste Handlers

Releases

- Prevent releases to the environment
- Clean up leaks or spills
 - Batteries-containerize
 - Pesticides-overpack
 - Mercury-containing equipment – containerize and prevent volatilization
 - Lamps - containerize
 - Antifreeze-stop, contain
 - Paint and paint-related waste - stop, contain
 - Aerosol containers - empty or overpack

Universal Waste Handlers

Record Keeping Requirements

- Small quantity handlers
 - Accumulation time limit is met, if appropriate
 - Management of antifreeze to prevent commingling

Universal Waste Handlers

Record Keeping Requirements

- Large quantity handlers of Universal Waste
 - Accumulation time limit is met, if appropriate
 - Management of antifreeze to prevent commingling
 - Receipts of UW from off site
 - Shipments off site
 - Record retention period

Universal Waste Handlers

Training

- Waste Handling
- Emergency Procedures
- Mercury Handling
- Reclamation Equipment Use and Maintenance



**It's Poll
Time**



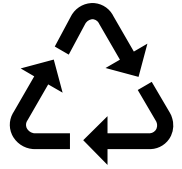
POLL

For which entity is the storage limitation of universal waste 10 days or less?

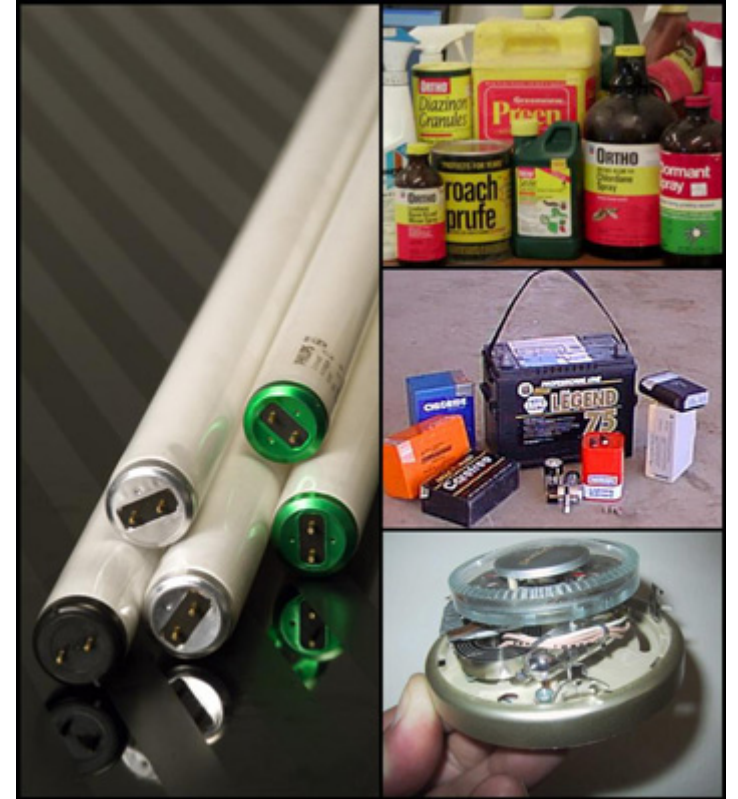
- a) Small Quantity Handler of Universal Waste
- b) Large Quantity Handler of Universal Waste
- c) Universal Waste Transporter
- d) Universal Waste Destination Facility

Please choose one multiple choice answer

Universal Waste Handlers – Treatment and Reclamation



Note: UW handlers may treat or recycle UW if authorized in the rules



Universal Waste Handlers – Treatment and Reclamation (Batteries)

Do not breach the casing of each battery cell

- Sorting by type
- Mixing types
- Discharging to remove charge
- Regeneration
- Disassembly
- Removal from consumer products
- Removal of electrolyte (cells may be opened)
 - Removed electrolyte must be evaluated

Universal Waste Handlers – Treatment and Reclamation (Mercury Devices)

- Removal of ampules
 - Prevent breakage
 - Over or in containment device
 - Clean-up system for spills collected in container managed under generator regulations
 - Well-ventilated area
 - Monitored to ensure OSHA mercury exposure compliance
 - Employees are trained
 - Management of removed ampules

Universal Waste Handlers – Treatment and Reclamation (Mercury Devices)

- Removal of mercury from other devices
 - Seal original housing
 - Follow requirements for removing ampules and managing removed ampules

Universal Waste Handlers – Treatment and Reclamation (Lamps)



Universal Waste Handlers – Treatment and Reclamation (Antifreeze)

Handlers of Universal Waste may reclaim antifreeze provided the following:

- Use commercially available equipment, or equipment specifically custom designed or retrofitted to reclaim the antifreeze
- Use reclamation equipment with enough processing capacity to reclaim the quantity of antifreeze received or generated by the handler within one year
- determine if the wastes generated from the reclamation of antifreeze are "hazardous wastes"
- *Antifreeze (subsequent to generation) mixed w/used oil is classified as a used oil & subject to the used oil rules. It is no longer a UW.

Universal Waste Handlers – Treatment and Reclamation (Paint and Paint-related Wastes)

Recycling
paint

- Paint can be reclaimed by any handler

Paint-related
waste

- Paint-related wastes can only be reclaimed on-site by the handler that generated the wastes or by a destination facility (i.e., permitted HW facility)

Universal Waste Handlers – Treatment and Reclamation (Paint and Paint-related Wastes)

Activities

- ❖ Puncturing and crushing of paint containers (5 gal limit)
 - Use appropriately designed equipment with sufficient processing capacity
 - Collect contents of the containers (collected paint can be classified as UW)
- ❖ Other reclamation
 - Wastes generated from the reclamation of paint or paint-related wastes are not UWs

Universal Waste Handlers – Treatment and Reclamation (Aerosol containers)

Puncturing and Crushing

Use appropriately designed equipment with sufficient processing capacity

Protect from ignition source

Puncture & crush in a ventilated area

Collect contents
-Incompatibles
-Waste evaluation
-Paint is UW

Universal Waste Handlers – Treatment and Reclamation (Aerosol Containers)

Potentially dangerous aerosol containers

- Insecticides
- Expanding foam
- Adhesives
- Pepper spray

Universal Waste Entities - Transporters

No EPA ID number is required

Transport according to U.S. DOT standards

No hazardous waste manifest is required

Storage for 10 days or less

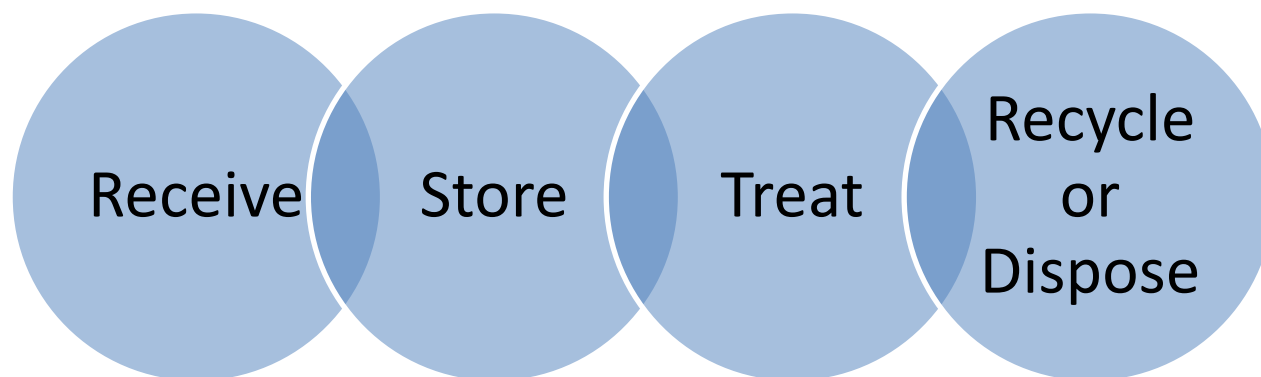
Most respond to a release of Universal Waste

Universal Waste Entities - Transporters



Universal Waste Entities - Destination Facilities

Permitted hazardous waste treatment, storage, and disposal facilities (TSDFs)

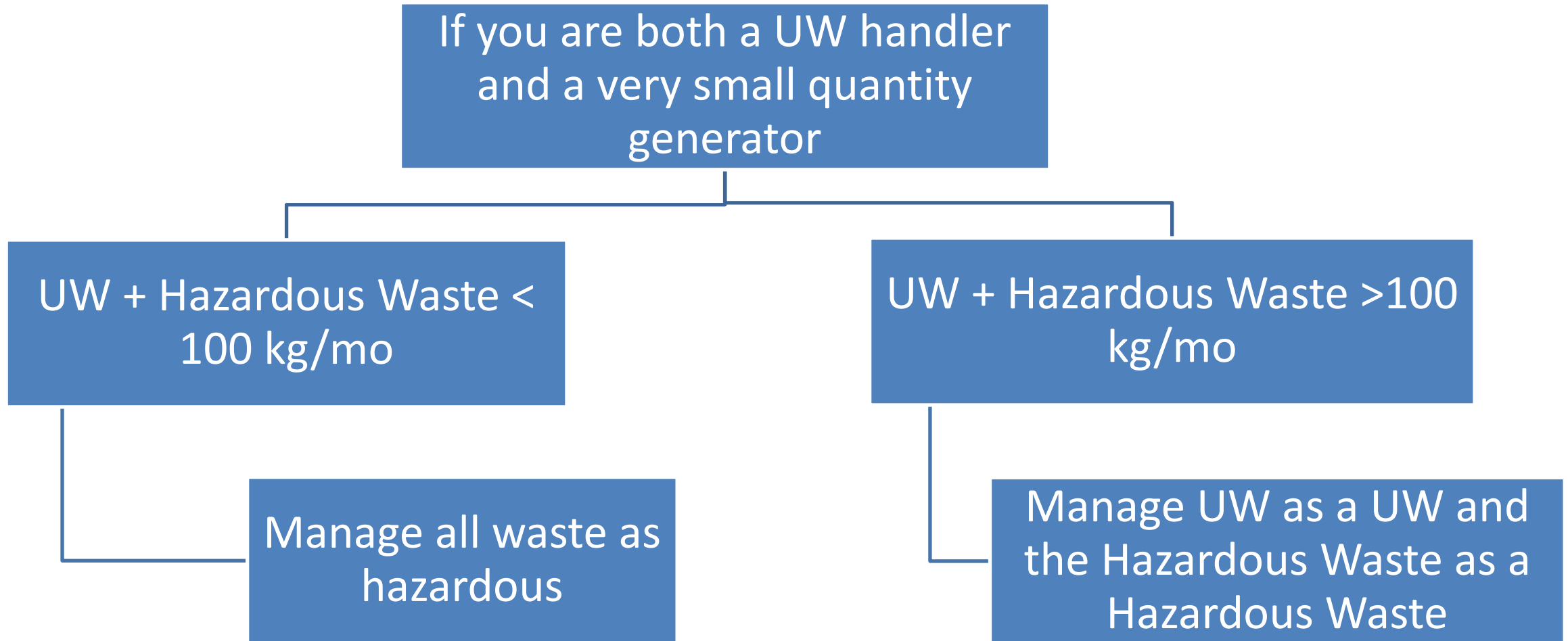


*Once received it is a fully regulated Hazardous Waste

[Commercial Facilities Accepting Hazardous Waste](#)

UW handler or a Very Small Quantity Generator

OAC rule 3745-273-08



UW Resources

Universal Waste Webpage

- <http://epa.ohio.gov/derr/hazwaste/universalwaste>

Links to

- Resources, Rules, Guidance, Checklist, and Contacts

Universal Waste Handler Requirements

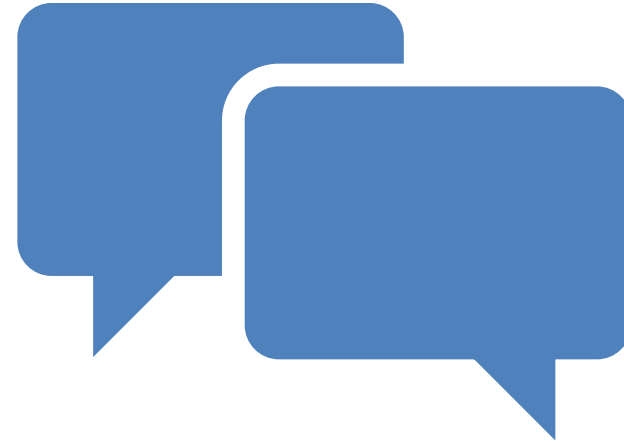
- <http://epa.ohio.gov/portals/32/pdf/UniversalWasteRequirementsTable.pdf>

Questions?

You can call the Hazardous Waste Compliance Assurance Section at (614) 644-2924.

We Value Your Feedback

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Thank You For Attending!

Up Next

- March 11, 2:00 – 3:00 p.m. → Open Burning, Odors, Dust, and Asbestos in Demolition in Your Community
- March 12 – BWC Safety Congress Environmental Day
 - Ohio EPA's Rules – What you need to know to stay out of trouble (8 - 9 a.m.)
 - Decoding RCRA: Navigating the Basics of Hazardous Waste (10 - 11 a.m.)
 - Ohio EPA Air Pollution Permit Requirements (1 - 2 p.m.)
 - What to expect during an Ohio EPA Virtual Inspection (3 - 4 p.m.)

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