Universal Waste Management

This fact sheet and the information it contains has been produced by the Arizona Department of Environmental Quality (ADEQ), with the aim of providing general information regarding universal waste management. While every measure has been taken to ensure the accuracy and completeness of the material, it is the universal waste generator’s and handler’s responsibility for following all environmental laws applicable in the Arizona Hazardous Waste Management Act (A.A.C. Title 18, Chapter 8 and A.R.S. Title 49, Chapter 5) and all federal hazardous waste regulations (40 CFR Parts 260 to 273).

Universal Waste

The EPA created a streamlined set of regulations for handling certain hazardous waste materials that are commonly generated, called universal waste. These include:

- **Batteries**
- **Unbroken Lamps**
- **Recalled Pesticides**
- **Mercury-Containing Equipment**

If any universal waste is broken or containers compromised (e.g., a broken lamp), a waste determination must be made. These may become hazardous waste and handled as such.

Universal Waste Management

Handlers must manage universal waste in a way that prevents releases of any components to the environment.

Labeling/Marking:

Handlers must clearly label or mark containers to identify the type of universal waste and when the waste was accumulated. Handlers may accumulate universal waste for no longer than one year from the start date the waste was generated.

Example of Label:
**Storage Requirements:**
In addition to meeting labeling/marking requirements, universal waste containers must be closed, compatible with the contents and structurally sound. Containers must also lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

**Examples of Containers:**

For questions and/or further guidance please contact the Hazardous Waste Unit at: wastecompliance@azdeq.gov

**Handlers at a Glance**
There are two types of universal waste handlers, detailed in the chart below. (epa.gov):

<table>
<thead>
<tr>
<th></th>
<th>Small Quantity Handler of Universal Waste (SQHUW)</th>
<th>Large Quantity Handler of Universal Waste (LQHUW)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Quantity Limit</strong></td>
<td>&lt; 11023.11-lbs (5,000-kg) on site (40 CFR § 273.9)</td>
<td>≥11023.11-lbs (5,000-kg) on site (40 CFR § 273.9)</td>
</tr>
<tr>
<td><strong>EPA ID Required?</strong></td>
<td>No (40 CFR § 273.12)</td>
<td>Yes (40 CFR § 273.32)</td>
</tr>
<tr>
<td><strong>On-Site Accumulation Limit</strong></td>
<td>&lt; 11023.11-lbs (5,000-kg) on site (40 CFR § 273.9)</td>
<td>None</td>
</tr>
<tr>
<td><strong>Storage Time Limit</strong></td>
<td>1-year, unless for proper recovery, treatment, or disposal (40 CFR § 273.15)</td>
<td>1-year, unless for proper recovery, treatment, or disposal (40 CFR § 273.35)</td>
</tr>
<tr>
<td><strong>Manifest Required?</strong></td>
<td>No (40 CFR § 273.19)</td>
<td>No, but must keep basic shipping records (40 CFR § 273.39)</td>
</tr>
<tr>
<td><strong>Required Personnel Training</strong></td>
<td>Basic training — The information must describe proper handling and emergency procedures, as appropriate for the type(s) of universal waste handled at the facility (40 CFR § 273.16)</td>
<td>Basic training — The information must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies (40 CFR § 273.16)</td>
</tr>
</tbody>
</table>
| **In the Event of a Release** | • A universal waste handler must immediately contain all releases of universal wastes and other residues from universal wastes.  
• A universal waste handler must determine whether any material resulting from the release is hazardous waste, and if so, must manage the hazardous waste in compliance with all applicable requirements (40 CFR §§ 260 – 272). The handler is considered the generator of the material resulting from the release. | |

For translations or other communications aids, please email the Title VI Coordinator at Bingham.Ian@azdeq.gov.

Para traducciones u otras ayudas de comunicación, envíe un correo electrónico al Coordinador del Título VI al Bingham.Ian@azdeq.gov.