

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



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:

| UNIVERSAL WASTE | |
|---|--|
| FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. THE FOLLOWING MATERIALS ARE REGULATED AS A UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273. | |
| <input type="checkbox"/> | UNIVERSAL WASTE - BATTERY |
| <input type="checkbox"/> | UNIVERSAL WASTE - MERCURY THERMOSTAT(S) |
| <input type="checkbox"/> | UNIVERSAL WASTE - PESTICIDE(S) |
| <input checked="" type="checkbox"/> | UNIVERSAL WASTE - FLUORESCENT LAMPS (as authorized) |
| <input type="checkbox"/> | UNIVERSAL WASTE - AEROSOL CANS |
| ACCUMULATION START DATE: 05/15/2020 | |
| _____ | |
| _____ | |
| D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX (REQUIRED DURING TRANSPORT, WHEN MATERIAL IS ALSO REGULATED BY 49 CFR PARTS 172.100) | |

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.

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:



As of 2020, aerosol cans can be managed as universal waste. Please see the Aerosol Can Fact Sheet: <https://azdeq.gov/hazwaste-resources>

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

Handlers at a Glance

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

| | Small Quantity Handler of Universal Waste (SQHUW) | Large Quantity Handler of Universal Waste (LQHUW) |
|------------------------------------|--|---|
| Quantity Limit | < 11023.11-lbs (5,000-kg) on site (40 CFR § 273.9) | ≥11023.11-lbs (5,000-kg) on site (40 CFR § 273.9) |
| EPA ID Required? | No (40 CFR § 273.12) | Yes (40 CFR § 273.32) |
| On-Site Accumulation Limit | < 11023.11-lbs (5,000-kg) on site (40 CFR § 273.9) | None |
| Storage Time Limit | 1-year, unless for proper recovery, treatment, or disposal (40 CFR § 273.15) | 1-year, unless for proper recovery, treatment, or disposal (40 CFR § 273.35) |
| Manifest Required? | No (40 CFR § 273.19) | No, but must keep basic shipping records (40 CFR § 273.39) |
| Required Personnel Training | 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) | 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) |
| In the Event of a Release | <ul style="list-style-type: none"> • 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, Leonard Drago, at Drago.Leonard@azdeq.gov or call 602-771-2288.

Para traducciones u otras ayudas de comunicación, envíe un correo electrónico al Coordinador del Título VI, Leonard Drago, a Drago.Leonard@azdeq.gov o llame al 602-771-2288.