

Universal Waste Yard Fact Sheet

When sites fail to comply with the Universal Waste rules, RCRA fines can be as high as **\$71,264 per day, per violation**.

Did You know that 1 out of 10 RCRA hazardous waste violations is related to the mismanagement of universal waste?

40 CFR 273 creates alternative management standards for certain specified hazardous wastes that are inherently low-hazard and generated in small amounts by nearly everyone. Federal universal wastes include pesticides, batteries, mercury-articles, and lamps.

Common Universal Waste Mistakes

1. Unmarked or improperly marked universal waste containment units

Typically, universal waste containers must be marked with the words that clearly indicate the type of waste in the container, for example, “*Universal waste – Batteries.*” This requirement is stated at 40 CFR 273.13 and 273.34; these sections also list some different naming conventions for batteries, lamps, mercury-containing equipment, and pesticides.

Common mistakes here include not labeling containers at all or marking the container with “Universal Waste” but not including the *type* of waste. In addition, generators may **not** use unapproved abbreviations, such as “bat” for “batteries.” The most misnamed type of universal waste is fluorescent “lamps.” These must not be called “bulbs” or “fluorescent tubes.” Only “*Universal waste—lamps*” is acceptable.

2. Lack of accumulation start dates or inventory records for universal waste

All hazardous waste containers—including containers of universal waste—should be marked with an accumulation start date, meaning the date on which the first “piece” or “drop” of waste touched the container.

If you **do not mark the accumulation start date** on a container of universal waste, you must have in place an alternate inventory tracking system to show you are in compliance with the universal waste accumulation time limit, which is **1 year**.

3. Improper universal waste storage

Universal waste must be stored “in a manner that will prevent releases.” When storing fluorescent lamps, for instance, an **open container is a common violation**. **Boxes** containing universal waste lamps **should be shut and secured with tape or Velcro** to prevent the lamps from jostling around, breaking, or spilling out of the box.

4. Failure to identify State universal wastes

As stated above, the Federal rules identify lamps, batteries, pesticides, and mercury-containing equipment as eligible for management as universal waste, and states that are authorized to oversee their own hazardous waste program may add to the list of universal wastes. **In California**, electronic devices like TVs, CPUs, DVD players, cell phones, and cathode ray tubes can be managed as universal waste.

UNIVERSAL WASTE

SHIPPER Mapistry

ADDRESS 2120 University Ave.

CITY, STATE, ZIP Berkeley, CA 94704

CONTENTS Universal Waste-Used Batteries

ACCUMULATION START DATE 03/05/2019

HW33AL NMC

Yes: Put the Accumulation start date



Yes: Everything must be labeled



Yes: All boxes must be taped if full & All drums must have their lid on top



No: Nothing should be sticking out & left open