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|  | 4.18 Universal Wastes  General Information for HHW Programs |

# Introduction

The collection of Universal Waste (UW) ensures environmentally responsible recycling and/or disposal practices. The term [“Universal”](https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf) refers to specific categories of Hazardous Wastes (HW) that may be managed in under reduced [RCRA](https://www.bing.com/search?q=rcra+hazardous+waste&cvid=8b40db592abe47c493da3e136e6d6bb6&aqs=edge.4.0l9j69i11004.6414j0j4&FORM=ANAB01&PC=U531) regulations. Collection of UW is voluntary, and upon acceptance, may be commingled with Household Hazardous Waste (HHW). Common types of UW include:

* Dry cell [batteries](https://www.pca.state.mn.us/business-with-us/rechargeable-batteries)
* [Pesticides](https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf)
* Fluorescent [lamps](https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf)
* [Mercury-containing](https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf) equipment (e.g., liquid mercury inside thermostats, switches, thermometers, relays, manometers, barometers, thermocouples, dental amalgams, gauges)

# 1. Recordkeeping

1.1 Facilities operating as ‘small quantity handlers’ are subject to reduced HW requirements, including:

* No reporting to the EPA or MPCA is required if accumulation limits of any single UW type is <5,000 kilograms.
* Use of a [shipping paper](https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/Shipping_Papers_and_Emergency_Response.pdf) may be used in lieu of a [manifest](https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf) for UW-only shipments.
* [Call2Recycle](https://www.call2recycle.org/) battery shipments are exempt from manifest requirements.
* Businesses may transport UW to this Facility using either a commercial or personal vehicle, without a HW generator [license](https://www.pca.state.mn.us/business-with-us/hazardous-waste-reporting-and-licensing), provided accumulation remains under the 5,000 kilogram threshold of any one UW type.

1.2 If participants are assessed with a UW disposal fee, the Facility shall issue an invoice or receipt.

UW-tracking documents must be retained on site for a minimum of three years, and include:

* Name and address of the originating UW.
* Description of materials shipped.
* Quantity of each UW type.
* Date of shipment receipt.

# 2. UW Processing

2.1 Packaging. UW shall be packaged in accordance with guidelines set by the state contracted HW disposal company or applicable recycling service provider.

2.2 Container labels or markings. Designated Facility areas and clearly labeled containers must be used for UW storage, including:

* A brief waste description followed by the words *‘For Recycling’*.
* Batteries: “Batteries for Recycling”, “UW Batteries” or “Waste Batteries.”
* Pesticides: “UW Pesticides” or “Waste Pesticides.”
* Thermostats: “UW Mercury Thermostats”, “Waste Mercury Thermostats” or “Used Mercury Thermostats.”

2.3 **Accumulation time limit.** The Facility shall demonstrate compliance with accumulation time limits, through:

* Maintaining an inventory system.
* Placement in a designated accumulation area.

2.4 Product exchange or reuse. Pesticides shall not be placed in facility reuse area. Application of best management practices and adherence to program protocols shall determine eligibility of other UW reuse materials.

2.5 Treatment of UW. This Facility is prohibited from disassembling items defined in [treating](https://www.pca.state.mn.us/sites/default/files/w-hw1-06.pdf) the UW. The following activities are not considered treatment:

* Responding to a release
* Accumulating or bulking wastes
* Separating batteries by chemistry
* Sorting batteries by chemistry
* Battery discharge
* Removal of batteries from products or battery packs
* Removal of mercury ampule from devices

2.6 Transporting and off-site management of UW

* This facility may utilize State contracts for UW management.
* UW must be securely transported during highway transport and delivered only to   
  agreed-upon receiving sites.
* Materials not eligible as UW must be managed as fully regulated HW and in accordance with U.S. Department of Transportation hazardous materials shipping requirements.

2.7 Wastes not considered UW

The following waste materials are not considered UW:

* Non-hazardous batteries
* [Electronic](https://www.pca.state.mn.us/sites/default/files/w-hw4-15.pdf) wastes
* [Architectural](https://www.pca.state.mn.us/sites/default/files/w-hw4-37a.pdf) paints
* [PCB](https://www.pca.state.mn.us/sites/default/files/w-hw4-48f.pdf) containing ballasts and small capacitors