

What is Universal Waste?

Universal Waste is defined in the Louisiana Administrative Code (LAC) and includes the following five categories:

- Spent lead-acid batteries
- Pesticides - Only certain pesticides are allowed. Call the EPA for a determination of whether or not a pesticide is a Universal Waste.
- Mercury thermostats
- Lamps - fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps.
- Antifreeze - ethylene glycol based

Who is a Small Quantity Handler (SQH)?

Small Quantity Handlers of Universal Waste are those handlers who do not accumulate more than 5,000 kilograms total of Universal Waste at any time. SQHs are prohibited from disposing of, diluting, or treating Universal Waste. They are NOT required to notify the department of Universal Waste handling activities nor are they required to keep records of shipments of Universal Waste.

How Should I Manage My Universal Waste?

Universal Waste must be managed in a way that prevents releases to the environment. This means that all Universal Waste must be stored as follows:

Batteries, lamps and thermostats that show evidence of leaks, spills, or damage that could cause leaks must be kept in a container that is closed, structurally sound, and compatible with the contents.

Lamp containers must prevent the breaking of the lamps and must remain closed.

Universal Waste pesticides and antifreeze must be kept in a container, tank, or other vessel that remains closed, is structurally sound, compatible with the Universal Waste, and that lacks evidence of leaks, spills, or damage that could cause leaks.

If a container develops a leak, it should be moved into an over pack container.

You must immediately clean up and place in a container any broken lamp or lamp that shows evidence of breakage, leaks, or damage that could cause the release of mercury or other hazardous constituents to the environment.

Special Management for Batteries and Thermostats

As long as the casing of individual battery cells is not breached and remains intact and closed you may:

- a. sort batteries by type;
- b. mix battery types in one container (keep in mind any compatibility issues);
- c. discharge batteries to remove the electric charge;
- d. regenerate used batteries;
- e. disassemble batteries or battery packs into individual batteries or cells;
- f. remove batteries from consumer products; or
- g. removing electrolyte from batteries provided that cells are immediately closed after removal.

You may remove mercury-containing ampules from Universal Waste thermostats, provided you :

- a. remove them in a manner designed to prevent breakage of the ampules;
- b. remove them only over or in a containment device sufficient to collect and contain any mercury released from an ampule in case of breakage;
- c. ensure that a mercury clean-up system is readily available to immediately transfer any mercury resulting from spills or leaks from broken ampules and that you immediately transfer any mercury resulting from spills or leaks from broken ampules to an appropriate container (per LAC 33:V.1109.E);
- d. ensure that the area in which ampules are removed is well ventilated and monitored to ensure compliance with applicable OSHA exposure levels for mercury;
- e. ensure that employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures, including transfer of mercury from containment devices to appropriate containers;
- f. store removed ampules in closed, nonleaking containers that are in good condition; and
- g. pack removed ampules in the container with packing materials adequate to prevent breakage during storage, handling, and transportation.

Labeling or Marking of Universal Waste

You must clearly mark or label your Universal Waste as follows depending on the type of waste contained: (If required, also use the appropriate U.S. Department of Transportation required label.)

"Universal Waste-Battery(ies)," "Waste Battery(ies)," "Used Battery(ies)," "Universal Waste-Pesticide(s)," "Waste-Pesticide(s)," "Universal Waste-Mercury Thermostat(s)," "Waste Mercury Thermostat(s)," "Used Mercury thermostat(s)," "Universal Waste - Lamp(s)," "Waste Lamp(s)," "Used Lamp(s)," "Universal Waste - Antifreeze," "Waste Antifreeze," "Used Antifreeze."

How Long May I Store Universal Waste?

You may accumulate Universal Waste for up to one year from the date of generation unless you need more time only to accumulate enough Universal Waste to facilitate proper recovery, treatment, or disposal. Remember, you will have to prove that this is the reason you are accumulating waste for longer than one year.

You should keep records of accumulation time using one of the following methods:

- Marking either the storage area, the containers, or individual items of Universal Waste with the earliest date that any Universal Waste in the container became a waste or was received; or
- Maintaining an inventory system on-site that identifies the date each Universal Waste became a waste or was received; or
- Using any other method which clearly demonstrates the length of time that the Universal Waste has been accumulated from the date it becomes a waste or is received.

Employee Training

You must inform all employees who handle or have responsibility for managing Universal Waste of the proper handling and emergency procedures appropriate to the type(s) of Universal Waste handled at the facility.

Response to Releases

You must immediately contain all releases and other residues of Universal Waste and determine whether any material resulting from the release is a hazardous waste.

How Can I Responsibly Dispose of Universal Waste?

You must not send or take Universal Waste to a place other than another Universal Waste handler, a destination facility, or other approved destination.

If you self-transport Universal Waste off-site, you become a Universal Waste Transporter for those self-transportation activities and must comply with the transporter requirements.

INFORMATION FOR LOUISIANA SMALL QUANTITY HANDLERS OF UNIVERSAL WASTE



**Louisiana Department of Environmental Quality
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