

Universal Waste, Solid Waste, and Recycling Program

Universal Waste

Scope

Element facilities maintain the status of a Small Quantity Handler of Universal Waste (facilities accumulate less than 5,000 kg on-site at any time) and this program serves as guidance on the proper management of Universal Wastes.

Universal Wastes (Bulbs, Batteries, Pesticides, or Mercury-Containing Devices) are hazardous wastes, but due to the large number of facilities generating these wastes, more relaxed regulations are in place to ensure proper disposal. If these wastes are not recycled, handled, or disposed of properly, they are subject to full RCRA and Hazardous Waste regulations. As such, Small Quantity Handlers of Universal Waste are prohibited from disposing, diluting, or treating any Universal Waste, and are not required to notify the EPA of their Universal Waste Handling Activities.

Team member responsibilities

Universal Waste Handler:

- Take responsibility for the proper management of Universal Waste as outlined in this program.
- Ensure all Universal Wastes are stored properly in approved, closed containers.
- Ensure all Universal Waste Containers are properly labeled with the words Universal Waste, the Contents, and the Accumulation Start Date.
- Ensure any spill of Universal Waste is cleaned up promptly.
- Confirm all shipments of Universal Wastes are only sent to another proper Universal Waste Handler or Destination facility.
- Verify all shipments of Universal Wastes are properly labeled.
- Retain all shipping documents of Universal Wastes.
- Report any irregularities to the proper authorities.

Universal Waste Storage and Labeling

Universal Wastes must be stored in containers compatible with the waste, be structurally sound, and remain closed when not adding/removing materials.

Universal Wastes, or the container in which a Universal Waste is placed, must be labeled, or marked clearly with, the words “Universal Waste” and its contents, such as:

- Universal Waste – Fluorescent Bulbs
- Universal Waste – Batteries

- Universal Waste – Pesticides
- Universal Waste – Mercury
- Thermostats

The Accumulation Start Date must be noted on the label to ensure compliance with the Accumulation Time Limit.

If Universal Waste is mixed with regular trash, the entirety of the comingled waste must be managed as Universal Waste or regular Hazardous Waste if applicable.

Accumulation Time Limits

A Small Quantity Handler of Universal Waste may accumulate Universal Wastes for no longer than one year from the date the Universal Waste is generated or received from another handler.

It is permissible to accumulate waste longer than one year from the date the Universal Waste is generated if such activity is solely for the accumulation of such quantities of Universal Waste as necessary to facilitate proper recovery, treatment, or disposal. However, the generator bears the burden of proving that such activity is solely for the accumulation of such quantities of Universal Waste as necessary to facilitate proper recovery, treatment, or disposal. The handler must be able to demonstrate the length of time that the Universal Waste has been accumulated from the date it becomes a waste. This may be done by labeling each item with the date it became a waste, labeling the container with the earliest date that any waste was placed into the container, maintaining an inventory system that identifies the date each universal waste became a waste, maintaining an inventory system on-site that identifies the earliest date a group of containers of Universal Waste became a waste, or any other method which demonstrates the length of time that the Universal Waste has been accumulated.

Employee Training

All employees who handle or have responsibility for managing Universal Wastes must be informed of procedures for proper handling and emergency procedures appropriate to the types of Universal Wastes handled at the facility.

Spills

The handler must immediately contain all releases of Universal Wastes and other residues from Universal Wastes. It must be determined whether any material resulting from the release is or has become Hazardous Waste, and if so, the spilled or released material must be managed as Hazardous Waste in compliance with standard hazardous waste regulations. Contact the Facility Emergency Response Team Coordinator for assistance.

Shipments

A Small Quantity Handler of Universal Waste is prohibited from sending or taking Universal Waste to a place other than another Universal Waste Handler or Destination Facility. If a Small Quantity Handler of Universal Waste self-transportes the waste off-site, the handler becomes a Universal Waste Transporter and must comply with transporter requirements and Department of Transportation regulations.

Generally, because Universal Wastes are not required to have a hazardous waste manifest, they are not considered hazardous wastes under the Department of Transportation regulations. However, some Universal Waste materials may be regulated by the Department of Transportation as hazardous materials because they meet the criteria for one or more hazard classes specified in 49 CFR 173.2. If a Universal Waste that is being offered for off-site transportation meets the definition of hazardous material, a Small Quantity Handler of Universal Waste must package, label, mark, placard, and prepare proper shipping papers for the shipment in accordance with applicable Department of Transportation regulations under 49 CFR Parts 171 through 180. Proper training and certification are required for all handlers of Hazardous Materials.

Before shipping Universal Waste to another Universal Waste Handler, it must be verified that the receiving handler agrees to accept the shipment. If the shipment is rejected by the receiving handler or destination facility, the originating handler must either receive the waste back or agree with the receiving handler on a new facility to which the shipment will be sent.

If a Small Quantity Handler of Universal Waste receives a shipment containing Hazardous Waste that is not Universal Waste, the handler must immediately notify the appropriate regional EPA office regarding the illegal shipment and provide the name, address, and phone number of the originating shipper. The EPA regional office will provide instructions for managing the hazardous waste.

Tracking Shipments:

Although receipts or other documents related to a shipment of Universal Waste should be kept if available, a Small Quantity Handler of Universal Waste is not required to keep specific records of shipments, as the EPA assumes that regular business documents used as part of the shipment will be sufficient to show that the material was managed correctly.

Used Oil

Any oil that has been refined from crude oil or any synthetic oil that has been used, and because of such use is contaminated by physical or chemical impurities, is considered a Used Oil. This included synthetic oils, transmission and brake fluids, lubricating greases, oils used as hydraulic fluid, etc. but does not include vegetable oil or animal fats. Used Oils are subject to relaxed regulations if they are intended to be recycled.

Storage of Used Oil:

- Must be in containers that are compatible and in good condition.
- Containers must be clearly labeled with the words “Used Oil” (do not use “Waste Oil”).
- Containers must be closed when not adding or removing materials. Secondary Containment (i.e., Spill Pallets) is highly recommended.
- There are no accumulation time limits or maximum storage amounts.

Used oil absorbents may be thrown in the general trash if there is no “free-flowing” oil, however, recycling is recommended.

Bulbs

Bulb Universal Wastes include variations of fluorescent bulbs, ballasts, high-intensity discharge bulbs, neon, mercury vapor, high-pressure sodium, metal halide lamps, and low mercury “Green End Cap” lamps.

Broken bulbs are considered Hazardous Waste and must be cleaned up immediately and shipped in accordance with RCRA Hazardous Waste DOT Regulations.

Bulbs must be stored in accordance with Universal Waste Storage and Labelling requirements.

Batteries

A used or unused battery, including spent lead-acid batteries (car batteries), becomes a waste on the date it is discarded (i.e., when sent for recycling) and must be managed under Universal Waste Regulations or regular Hazardous Waste regulations.

Batteries must be stored in a way that prevents the release of any Universal Waste or component of a Universal Waste to the environment. Batteries that show evidence of leakage or damage must be stored in containers that are closed, structurally sound, and compatible with the contents of the battery.

As long as the casing of each battery cell is not breached and remains intact and closed, Small Quantity Handlers of Universal Waste may conduct the following activities:

- Sorting batteries by type.
- Mixing battery types in one container.
- Discharging batteries to remove the electric charge.
- Regenerating used batteries.
- Disassembling batteries or battery packs into individual batteries or cells.
- Removing batteries from consumer products.
- Removing electrolytes from batteries.

Anyone who removes electrolytes from batteries, or who generates other waste associated with batteries (i.e., battery pack materials, discarded consumer products) must determine if the materials are a regular Hazardous Waste. If the electrolyte and/or other solid waste is hazardous waste, it is subject to all applicable requirements of regular hazardous waste. The handler is considered the generator of hazardous waste and must comply with all the general requirements. This includes EPA notification and strict limits on storage. If the electrolyte or other solid waste is not a hazardous waste, you may dispose of the materials in a solid waste landfill.

Pesticides

Pesticides are generally managed under the Federal Insecticide, Fungicide, and Rodenticide Act. Universal Waste pesticides include both recalled pesticide stocks of suspended and canceled pesticides that are part of a voluntary or mandatory recall, and unused pesticide products that are collected and managed as part of a waste pesticide collection program. Pesticides that are managed in accordance

with the disposal instructions of the label, or on a working farm, are exempt from the Universal Waste regulations.

Labeling:

The disposal container must be labeled with the pesticide's original label and the wording Universal Waste-Pesticide(s). If the original label is not legible, it must be labeled either in accordance with DOT requirements or have a label officially recognized by the state as part of a pesticide collection program.

Mercury-Containing Devices and Thermostats

A Small Quantity Handler of Universal Waste must manage mercury-containing devices and thermostats in a way that prevents the release of any Universal Waste, or component of a Universal Waste, to the environment. The handler must contain any mercury-containing device that shows evidence of leakage, spillage, or damage that could cause leakage, under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, and compatible with the contents of the thermostat.

Ampules containing mercury may be removed from devices provided:

- Ampules are stored in a manner to prevent breakage.
- Ampules are only removed over a tray or pan sufficient to collect and contain any mercury released in case of breakage.
- A mercury clean-up system is readily available.
- Spills or leaks from broken ampules are immediately cleaned up and placed into a proper container.
- The area in which ampules are removed is well-ventilated and monitored to ensure compliance with applicable exposure levels for mercury.
- Employees removing ampules are thoroughly familiar with proper waste-mercury handling and emergency procedures, including the transfer of mercury from containment devices to appropriate containers.
- Removed ampules are stored in closed, non-leaking containers that are in good condition.
- Removed ampules are placed in the container with packing materials adequate to prevent breakage during storage, handling, and transportation.
- Any solid waste generated because of the removal of mercury-containing ampules or clean-up residues, is assessed for characteristics of a hazardous waste. If it is, the materials must be managed in accordance with the regular hazardous waste regulations.

Solid Waste

Element aims to manage solid waste responsibly across our offices by reducing unnecessary waste, promoting reuse where possible, and ensuring waste is disposed of in accordance with local requirements. Team members are encouraged to minimize single-use materials, use designated waste streams, and follow office-specific waste management practices.

Element will continue to identify opportunities to improve waste diversion and reduce the environmental impact of waste generated through our operations.

Recycling

Element is committed to supporting recycling practices across our offices to reduce waste sent to landfill and promote the responsible use of materials. Where recycling services are available, team members are expected to separate recyclable materials, such as paper, cardboard, plastics, organics, and other accepted items, in accordance with local recycling requirements.

Element will continue to encourage waste reduction, reuse, and recycling practices that support our broader environmental and sustainability objectives.

Administration

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