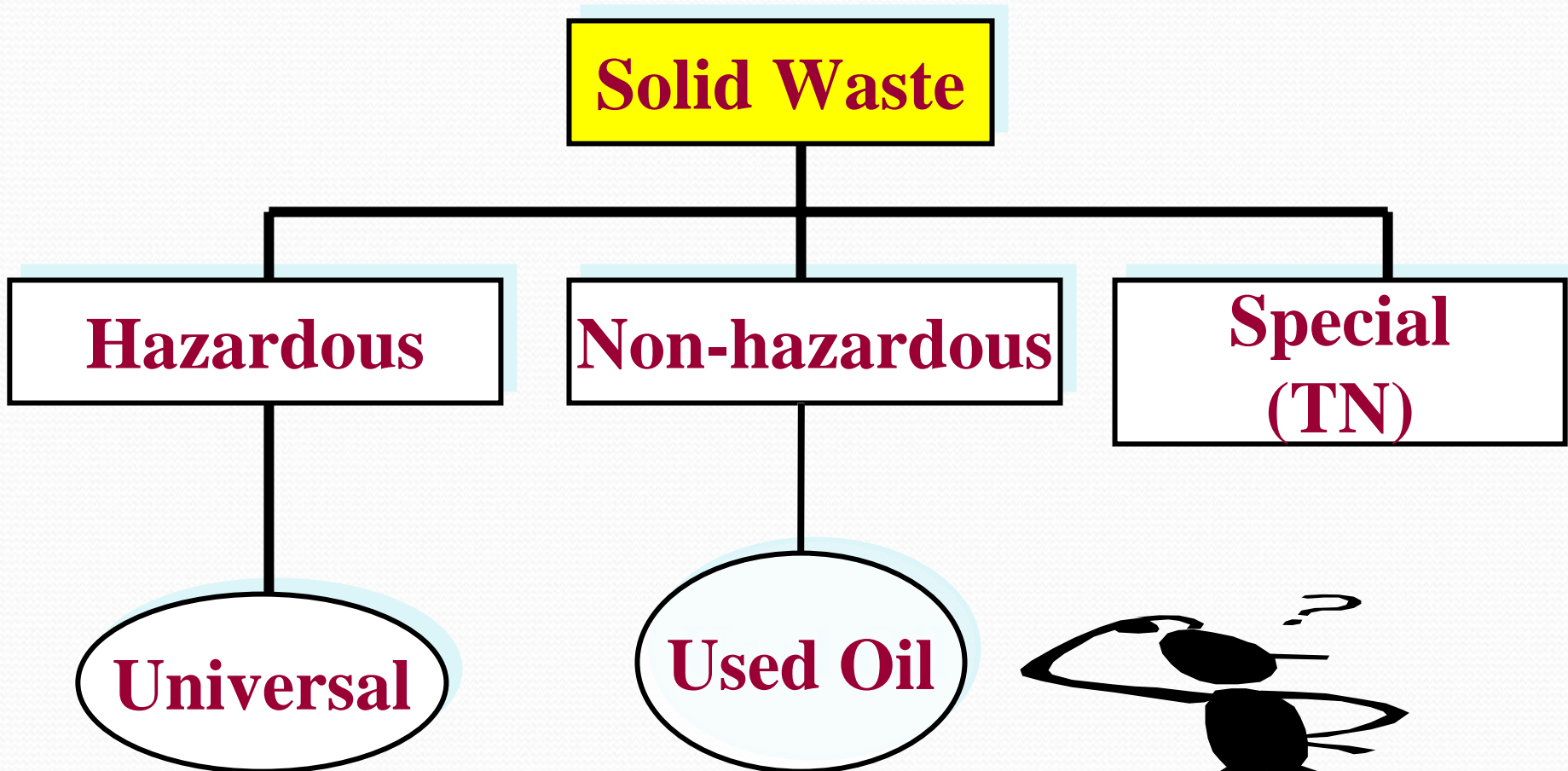
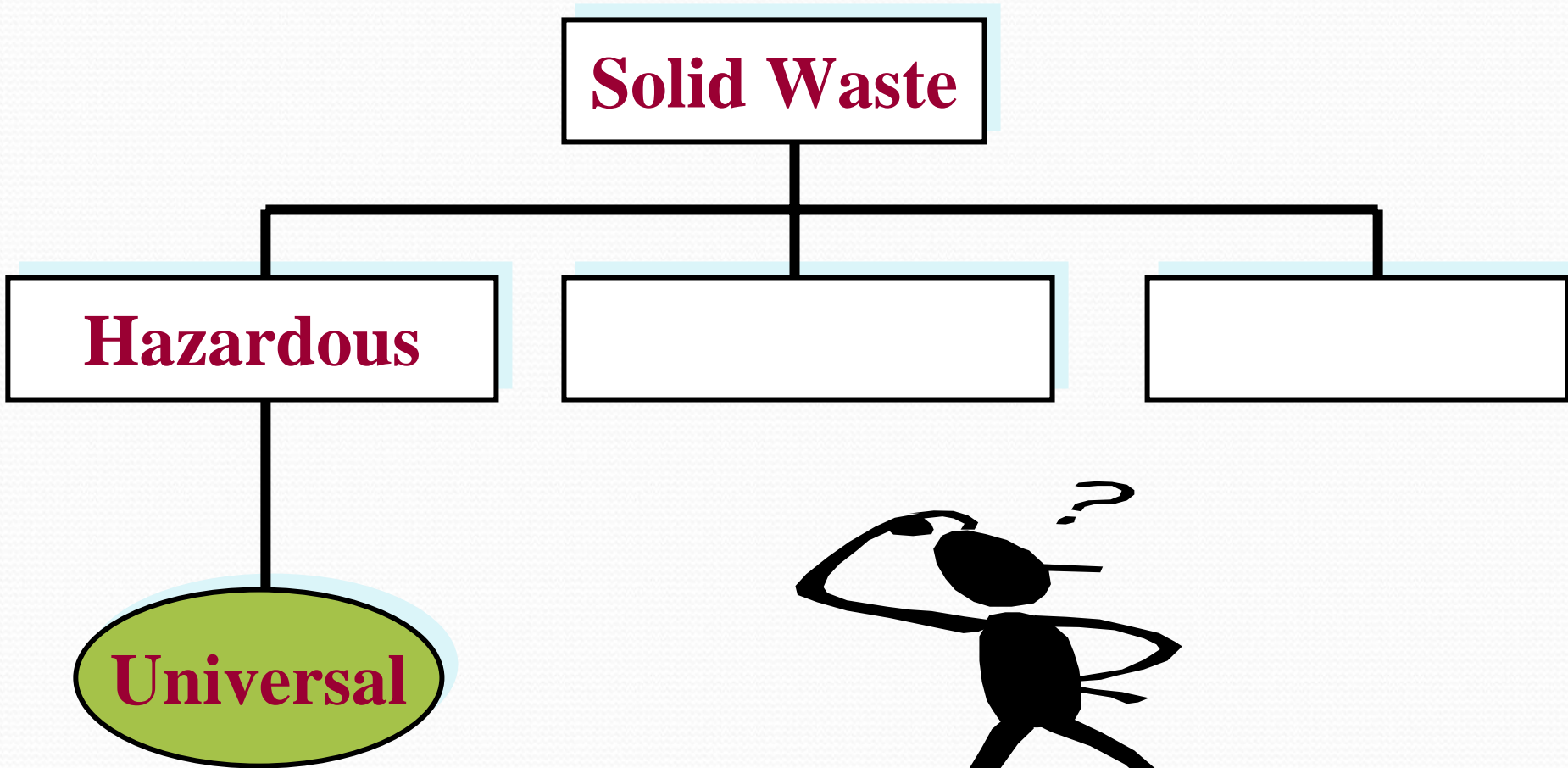


RCRA Regulated - Which Category?

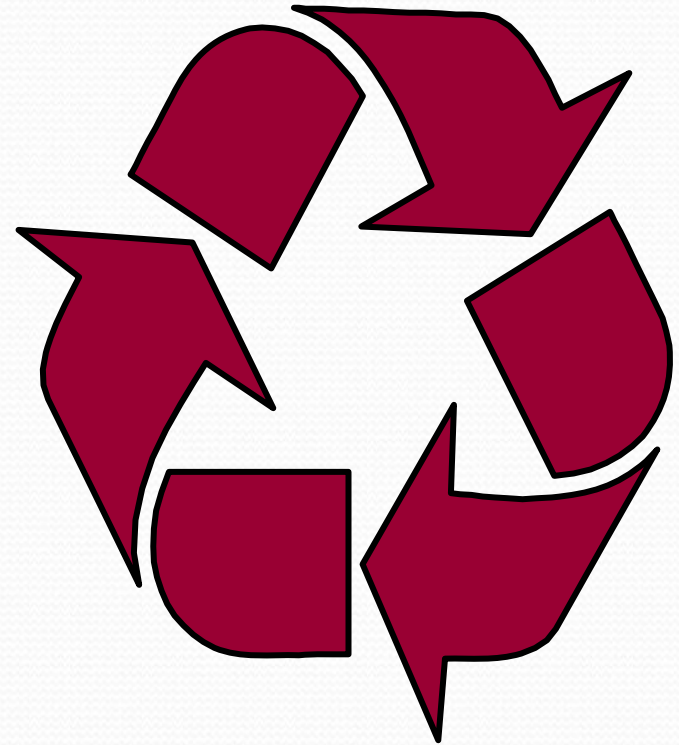


RCRA Regulated - Which Category?



Universal Wastes

- Batteries
- Agricultural pesticides
- Mercury Containing Equipment*
- Mercury Lamps



Universal Waste

- The Regulated Community:
 - Generator
 - Large Quantity Handler ≥ 5000 kg
 - Small Quantity Handler < 5000 kg
 - Transporter
 - Destination Facility

Universal Waste Management

- General requirements for generators:
 - Accumulation
 - Labeling
 - Storage and handling
 - Notifications
 - Employee training
 - Release response
 - Shipping and tracking

Accumulation Time

- One year
- Longer if facilitates recovery, treatment, or disposal
- Must prove time of accumulation

Universal Waste Labels

- **Universal Waste** - Battery(ies)
Pesticide(s)
Mercury Containing Equipment
Mercury Lamps
- **Waste** Battery(ies)
Pesticide(s)
Mercury Containing Equipment
Mercury Lamp(s)
- **Used** Battery(ies)
Mercury Containing Equipment
Mercury Lamp(s)

Storage and Handling

- Storage containers must be labeled
- Batteries may be sorted, cell casings should remain intact
- For thermostats, mercury ampules may be removed*
- Mercury lamps may be crushed for volume control*

* **Note:** Several safety and health operating conditions apply

Notification Requirements

- Not required for small quantity handler of universal waste
- Required for large quantity handler that does not already have EPA ID number (Notification must be written, if required)

Notification Requirements

- Notification and permit-by-rule not required for crushing if small and large quantity handler:
 - crushes bulbs on site of generation
- Destination facilities and transporters who crush for volume reduction must notify

Training Requirements

- Small quantity handler:
 - must inform employees of proper handling and emergency procedures, **except mercury containing equipment (must ensure)**
- Large quantity handler:
 - must ensure employees are thoroughly familiar with proper handling and emergency procedures

Responses to Releases

- Immediately contain all releases and residues
- Make waste determinations on spill/residues
- Dispose of material properly (e.g. hazardous residues from spill clean ups)

Shipping Requirements

- Must package and ship per DOT requirements including use of manifests
- Send only to another handler or destination facility
- Ensure that receiving facility agrees to receive shipment

Tracking Requirements


- All generators of Universal Wastes must keep track- who, what, when, where.....

Pharmaceuticals

- At Issue:
- Definition of generator
 - Facility or specific care units

Pharmaceuticals

- At Issue:
- Definition of used or waste, but non-used
- Red bag vs. yellow bag material

- 
- At Issue:
 - Areas of inspection
 - Storage areas vs. care units

- 
- At Issue:
 - Reverse distribution/recalls