



newjersey **nj dep**
department of environmental protection

Universal Waste Handler Inspector Perspective

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Remember your Universal Waste Streams:

“The Big 3”

- Lamps
- Batteries
- Consumer Electronics

Then the rest:

- Pesticides
- Oil-based Finishes
- Mercury containing devices

Universal Waste Handler - Issues Found During Inspections

- Using Proper Containers
- Labeling / Marking
- Accumulation Time
- Treatment / Disposal
- Record-keeping



Proper Containers



Proper Containers

- Must be structurally sound
- Adequate to prevent breakage (UW lamps)
- Must remain closed while in storage
- Compatible with the contents of the UW
- Must not show evidence of leakage, spillage
- Containers that do not meet the requirement must be overpacked (UW pesticides)

Example on how NOT to store
UW Lamps



Another example on how NOT to store UW Lamps



Example on how NOT to store
UW Lamps



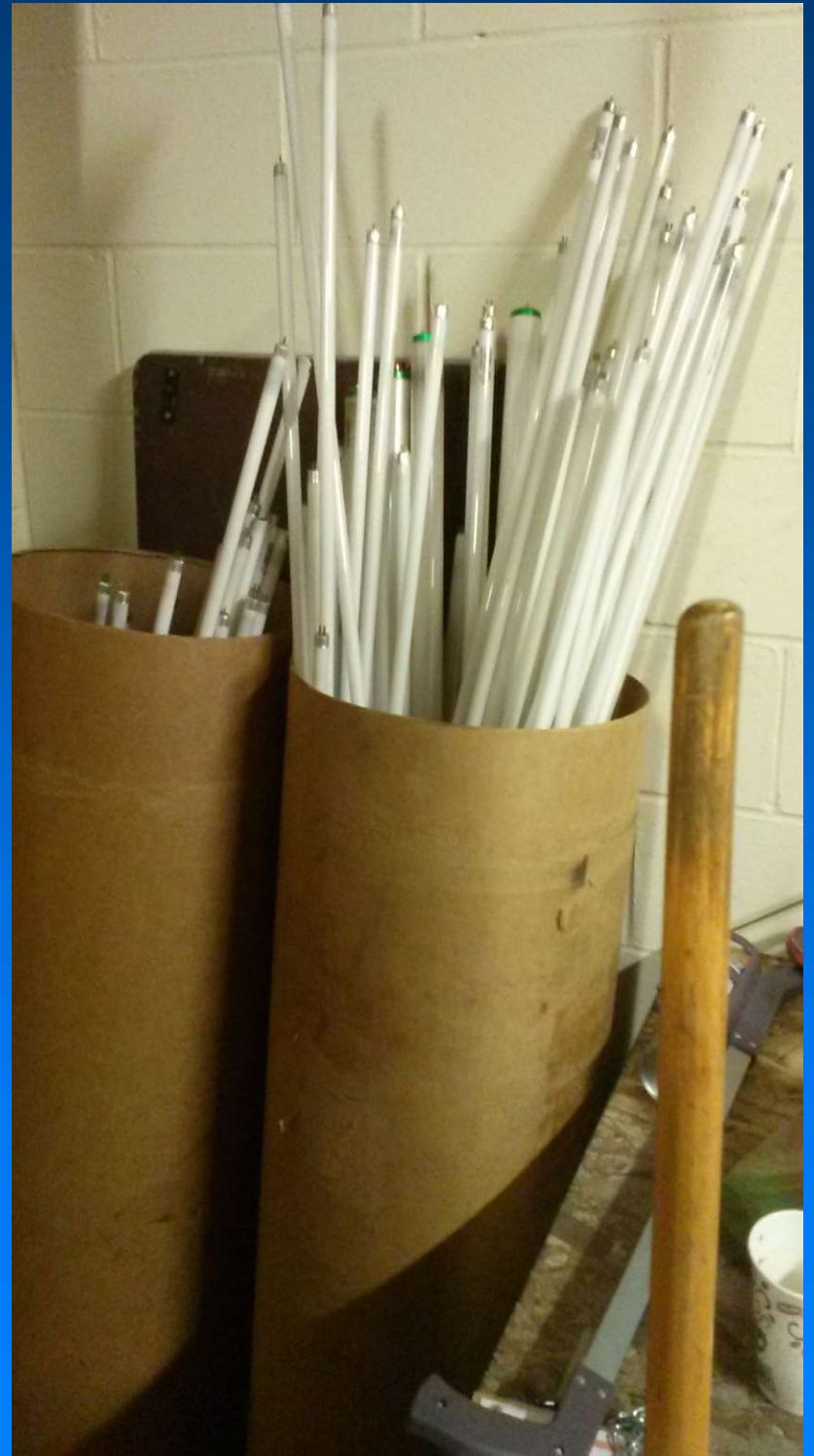


12/16/2009



Improper container closure
and storage









Universal Waste - Lamps



Examples of Proper Containers

Universal Waste - Batteries



05/07/2008



01/21/2009



09/28/2010



09/28/2010





BROKEN GLASS
Must be collected and labeled as
hazardous waste. Store in a
leak-proof plastic container.
Keep lid secure at all
times.

Consumer Electronics Waste
All consumer electronics (e.g.,
cell phones, MP3 players, digital
cameras, etc.) must be collected
and labeled as hazardous waste.
Keep lid secure at all times.

**4 and 8 Mil Polypropylene
Liner/Wall**

Other Hazardous Waste Labels
All hazardous waste must be
labeled with the following
information:
1. Name of the waste
2. Hazardous waste code
3. Date of labeling
4. Name of the person labeling
5. Signature of the person labeling
6. Date of labeling

HAZARDOUS WASTE LABELS
All hazardous waste must be
labeled with the following
information:
1. Name of the waste
2. Hazardous waste code
3. Date of labeling
4. Name of the person labeling
5. Signature of the person labeling
6. Date of labeling

**NEW
KEEP
WALL
USING**



AEROSOL CANS

LEAD-ACID BATTERIES

BALLASTS

OTHER HAZARDOUS WASTE



**NEW 4 FOOT
BULBS**



BROKEN BULBS
Must be collected and handled as hazardous waste. Store in a separate secure container.

Approved Date	Issued By	Reference Number	Location / Unit	Approved By	Status

Page 1 of 1

Stored in outside shed. Brought to county site once per year or as required. Must have a label with accum. start date. Labels located at the collection space in the shed. Please see facility maintenance for removal and labeling.

http://www.bcuu.org/index.asp?SEC=E2FF9FA5-19EC-4FD5-96E5-E84D75FEF32E&Type=B_BASIC

Approval Date	Printing No.	Reference Procedure No.	Location / City	Approval By	Status
04/05/2014	0000743	0000743-001	WASHDC, DC	607 607-001	WASHDC, DC

Page 1 of 1

Record "Accum Start" at start of use. Top cover must be on at all times. Container must be removed from facility 1 year from Accum. Start date.



Approved Date	Approved By	Reviewed / Edited	Reviewed / Edited	Approved By	Approved Date
10/10/2018	[Signature]	10/10/2018	[Signature]	10/10/2018	[Signature]

UV Lamps
Aerosol Cans
Lead Acid Batteries
Mercury Switches
Ballasts



Approved Date	Project No.	Reference Worksheet No.	Worksheet / Sub	Approved By	Status
12/12/12	123456	Worksheet 1.1	Worksheet 1.1	12/12/12	Approved

WASTE NON-RCRA OR RCRA EXEMPT UNIVERSAL WASTE		WASTE NON-RCRA OR RCRA EXEMPT HAZARDOUS	
<p>WASTE DESCRIPTION (USE 4-DIGIT CODE)</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p>	<p>WASTE DESCRIPTION (USE 4-DIGIT CODE)</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p>	<p>WASTE DESCRIPTION (USE 4-DIGIT CODE)</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p>	<p>WASTE DESCRIPTION (USE 4-DIGIT CODE)</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p> <p>RCRA CODE: 01-000-0000</p> <p>UNIVERSAL WASTE CODE: 01-000-0000</p> <p>HAZARDOUS WASTE CODE: 01-000-0000</p>

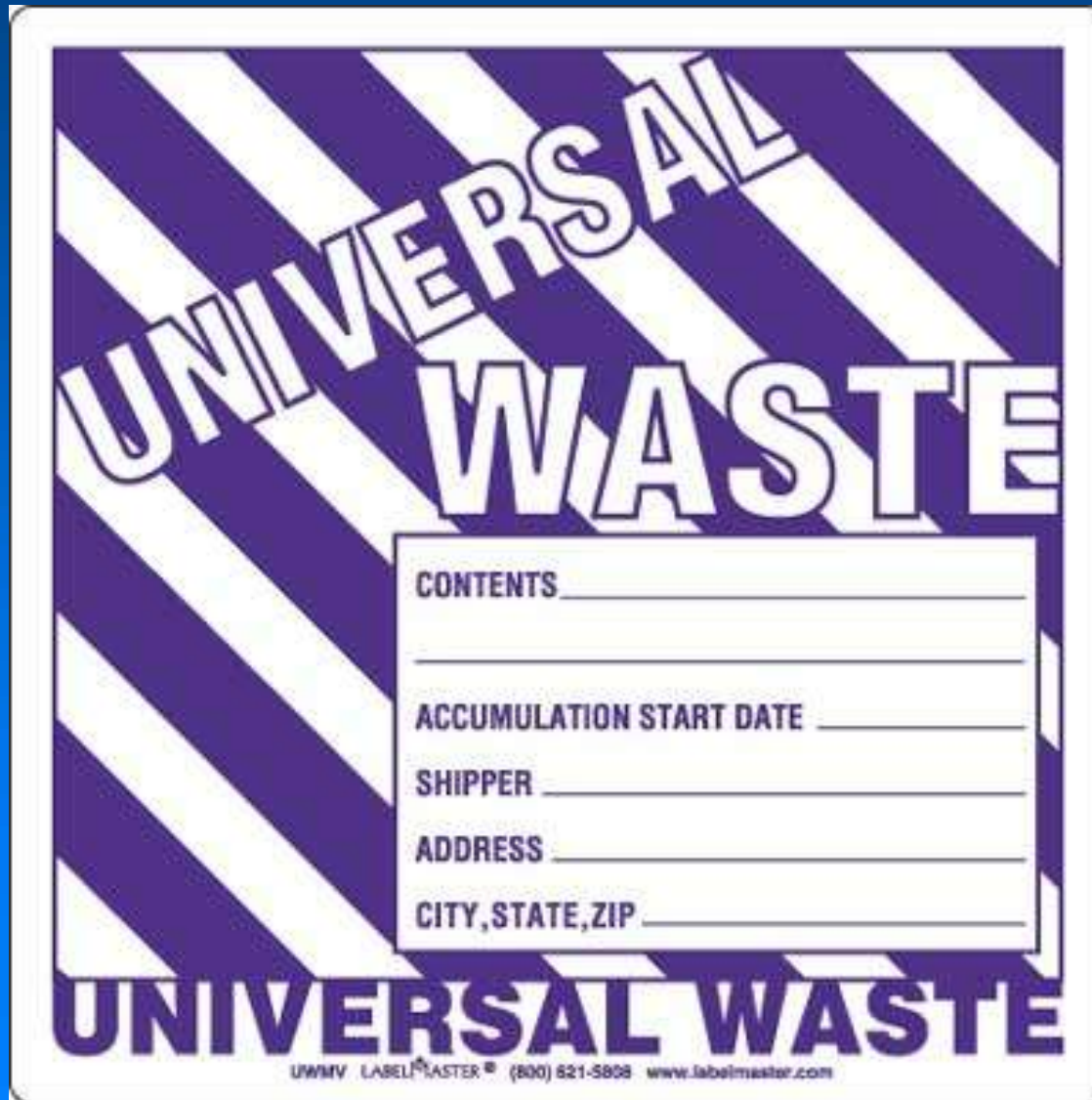
UNITED STATES CUSTOMS SERVICE
EX-101 (Rev. 1-86)

COUNTRY OF ORIGIN _____
COMMODITY CODE _____
QUANTITY _____
VALUE _____
DUTY PAID _____

STANDARD FORM NO. 7501

U.S. CUSTOMS AND BORDER PROTECTION
DEPARTMENT OF TREASURY

Labeling Universal Wastes



A rectangular label template for universal waste. The background features a diagonal black and white striped pattern. The words "UNIVERSAL" and "WASTE" are printed in large, bold, black, sans-serif capital letters, with "UNIVERSAL" on the top left and "WASTE" on the bottom right, both following the diagonal stripes. In the center, there is a white rectangular box containing five lines of text, each followed by a horizontal line for writing: "CONTENTS", "ACCUMULATION START DATE", "SHIPPER", "ADDRESS", and "CITY, STATE, ZIP". At the bottom of the label, the words "UNIVERSAL WASTE" are printed in a smaller, bold, black, sans-serif font. Below this, in a very small font, is the text "UWMV LABELMASTER® (800) 621-5808 www.labelmaster.com".

UNIVERSAL WASTE

CONTENTS _____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

UNIVERSAL WASTE

UWMV LABELMASTER® (800) 621-5808 www.labelmaster.com

Labeling / Marking

- Universal Wastes must be labeled / marked either by container or individually
- Simplest way to comply is using a piece of paper taped to a container. However, a purchased pre-printed label is acceptable
- Label must be clear, legible, and easily visible

Labeling / Marking

- Acceptable wording is:
 - “Universal Waste – Lamps”, “Used Lamps”, or “Waste Lamps”
 - “Universal Waste – Battery(ies)”, “Used Battery(ies)”, or “Waste Battery(ies)”
 - “Universal Waste – Consumer Electronics”
 - “Universal Waste – Pesticides”
 - “Universal Waste - Oil-Based Finishes”
 - “Universal Waste - Mercury Containing Devices”

Universal Waste - Consumer Electronics not properly marked







07/02/2010

Boards





AR-500VT

Reserve
11/13/10

UNITED STATES
POSTAL SERVICE
FLAT MAIL TRAY

07/02/2010





04/16/2014



WARNING

Hg

WARNING - LAMP CONTAINS MERCURY

Dispose or recycle in accordance with federal, state and local regulations

VORSICHT – RÖHRE ENTHÄLT QUECKSILBER

Entsorgen oder recyceln Sie die Röhren gemäß der staatlichen und regionalen Vorschriften

ADVERTENCIA - LA LÁMPARA CONTIENE MERCURIO

Eliminar o reciclar de acuerdo con autoridades federales, estatales y locales

04/16/2014

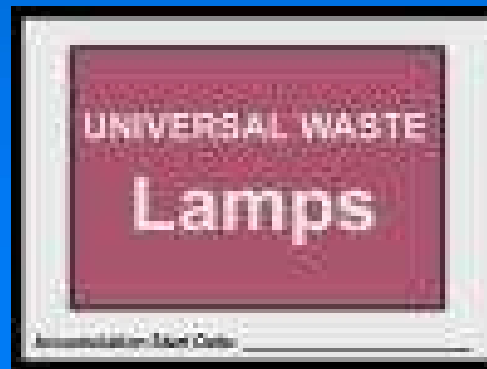




Examples of Labeling / Marking Universal Waste

- Link for labels

http://www.ecy.wa.gov/programs/hwtr/hw_labels/index.html



Some of Universal Waste - Lamps shown here are marked
some unfortunately are NOT.



Container holding Universal
Waste - Lamps shown here
properly marked, but
improperly stored.



USED LAMPS

USED LAMPS

USED LAMPS

USED LAMPS

USED LAMPS

01/21/2009



Universal Waste -
Consumer Electronics

Month - AUGUST

Year - 2010

Weight (lbs) - 615

08/20/2010



Universal Waste -
Consumer Electronics

Month - Aug
Year - 2010
Weight (lbs) - 1
Qty

08/20/2010

Unit -
Consumer Electronics
Month - June
Year - 2010
Weight (lbs) - 123



LABEL
OTHER
END

LABEL
OTHER
END

UNITED STATES
POSTAL SERVICE



Universal Waste -
Consumer Electronics

Month - May
Year - 2010
Weight (lbs) - 58



Universal Waste -
Consumer Electronics

Month - May
Year - 2010
Weight (lbs) - 378



08/20/2010

Universal Waste –
Consumer Electronics

Month - *May*

Year – 2010

Weight (lbs) - *358*

08/20/2010

Accumulation Time

- Universal waste may be accumulated for no longer than one year from the date the universal waste is generated
- Simplest way to comply is by marking the container/equipment with the accumulation start date (most accurate)
- Maintain manifests, bill of lading, or invoices, showing proof of shipment offsite

UNIVERSAL WASTE

CONTENTS CRT - WASTE
(MONITOR)

ACCUMULATION START DATE 10/18/04

SHIPPER B46-134

ADDRESS _____

CITY, STATE, ZIP _____

~~HWAT~~ PICK-UP DATE: 10/18/04



Universal
Waste

01/01/2010

Treatment / Disposal

- Handlers are prohibited from diluting or treating universal waste (i.e. crushing lamps)
- Here is the link on lamp crushing:

<http://www.nj.gov/dep/enforcement/advisories/2005-13.pdf>

- Handlers are prohibited from disposing of universal waste

DO NOT PLACE IN REGULAR GARBAGE





Record-keeping

- Only Large Quantity Handlers are required to keep records of shipments of universal waste
- Acceptable records include logs, invoices, manifests, bill of lading etc.
- Records must show the name & address of the destination facility; the quantities & types of waste sent; and the date of shipment
- Records must be kept for three years
- Record-keeping optional for Small Quantity Handlers but recommended

Online Resources

- Inspection Checklists

<http://www.nj.gov/dep/enforcement/hw-chklists.html>

- Inspection Reports

<http://www.nj.gov/dep/opra/online.html>

- Fact Sheets

<http://www.state.nj.us/dep/dshw/lrm/uwaste/uwindex.htm>

- Rules & Regulations

<http://www.nj.gov/dep/dshw/resource/rules.htm>

Any Questions???



Please wait for panel discussion!!