



Properly Managing Universal Waste

What is hazardous waste?

Hazardous waste poses a threat to human health and the environment. It may be toxic, ignitable, corrosive, or reactive. Every business in Idaho is required to determine whether their wastes are hazardous and track the volume of hazardous wastes generated. Facilities generating hazardous waste are regulated by state and federal rules that govern storage, transport, and disposal.

What are universal wastes?

The “Universal Waste Rule” ([40 CFR 273](#)) allows certain hazardous wastes to be managed under streamlined requirements. The rule is designed to encourage recycling and proper disposal of some common hazardous wastes and to reduce the regulatory burden on businesses that generate these wastes. The universal waste rule is optional; businesses may opt to manage these wastes as hazardous wastes. Universal wastes include the following:

- **Batteries** such as nickel-cadmium (Ni-Cd) and small sealed lead-acid batteries found in many common items including electronic equipment, cell phones, portable computers, and emergency backup lighting.
- **Agricultural pesticides** that have been recalled, banned from use, or are collected and managed as part of a waste pesticide collection program.
- **Spent lamps** that contain mercury or lead (e.g., fluorescent, high-intensity discharge [HID], neon, mercury vapor, high-pressure sodium, and metal halide lamps).
- **Mercury-containing equipment** including thermostats with mercury, barometers, manometers, temperature and pressure gauges, and mercury switches.
- **Aerosol cans**, defined as non-refillable receptacles containing gas that is compressed, liquefied, or dissolved under pressure, the sole purpose of which is to expel a liquid, paste, or powder and fitted with a self-closing release device allowing the contents to be ejected by the gas.

What businesses can use the universal waste rule?

The universal waste rule can be utilized by all businesses that generate or transport these waste types. However, the rule provides the most benefit to small and large quantity hazardous waste generators (see table below). The universal waste rule does not apply to treatment, storage, and disposal facilities.

Very small quantity generators (VSQGs) may benefit as well. By managing their universal wastes according to the rule, facilities do not have to count these wastes toward their monthly waste generation volume. Doing so may help a facility maintain its VSQG status by keeping monthly hazardous waste generation rates below the threshold for the category.

Hazardous Waste Generator Size	Hazardous Waste Generated in Any Month	Acute Hazardous Waste Generated in Any Month
Very Small Quantity Generator (VSQG)	<220 pounds	<2.2 pounds
Small Quantity Generator (SQG)	220–2,200 pounds	<2.2 pounds
Large Quantity Generator (LQG)	>2,200 pounds	>2.2 pounds

How does the universal waste rule benefit my business?

The universal waste rule can save time and money. Businesses can reduce compliance costs and the amount of time spent on paperwork. The following are some of the benefits:

- **Less hazardous waste counted toward total:** Universal waste does not need to be calculated with hazardous waste generator size and monthly accumulation totals.
- **Longer storage times:** Universal waste can be stored for up to 1 year before sending it for disposal.
- **Exemption from certain hauling requirements:** A hazardous waste manifest and a registered hazardous waste transporter are not required to transport universal waste in Idaho.

What requirements must be met?

Universal waste requirements are less stringent than those for other hazardous wastes.

- Universal wastes must be stored in closed, compatible containers. Containers should be labeled with the accumulation start date and the contents (e.g., universal waste-lamps).
- Universal wastes can be stored on site for up to 1 year.
- Waste must be sent to an approved universal waste handler or universal waste destination facility.

Can I puncture aerosol cans?

Generators can puncture their universal waste aerosols cans if they meet the requirements in 40 [CFR 273.13\(e\)](#) and [273.33\(e\)](#):

- Puncture and drain cans using a device specifically designed to safely puncture cans and effectively contain the residual contents and emissions.
- Establish and follow a written procedure detailing how to safely puncture and drain the cans. Ensure employees are trained in the proper procedures.
- Ensure that puncturing is done in a manner designed to prevent fires and to prevent the release of any component of universal waste to the environment.
- Immediately transfer the contents from the can or puncturing device to a container. Conduct a hazardous waste determination on the collected contents and manage accordingly.
- Maintain a written procedure to address a spill or release and keep a spill clean-up kit onsite.

For More Information

For specific questions, contact your DEQ regional office:

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| • Boise: | (208) 373-0550 | • Lewiston: | (208) 799-4370 |
| • Coeur d'Alene: | (208) 769-1422 | • Pocatello: | (208) 236-6160 |
| • Idaho Falls: | (208) 528-2650 | • Twin Falls: | (208) 736-2190 |

For general information, visit www.deq.idaho.gov or call DEQ's Hazardous Waste Bureau at (208) 373-0502.