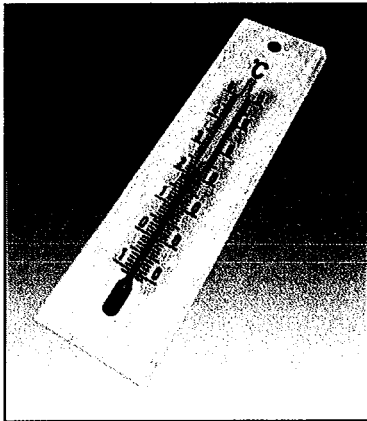


# PRO P **FACT** Sheet

## Universal Waste Recycling

Certain types of hazardous waste generated by practically any type of business can be recycled by following the Universal Waste Rule. The Environmental Protection Agency (EPA) issued this rule in 1995 to promote recycling and proper disposal of some common hazardous wastes by re-defining these wastes as "universally generated."

Universally generated wastes should not be put into the waste stream. Let's review some of the vital questions and get the answers needed to enable your business to recycle these materials properly.



**Q: What wastes are considered "Universal Wastes?"**

**A:** In Pennsylvania, hazardous wastes including batteries, thermo stats, lamps, mercury-containing equipment and agricultural pesticides are considered "universally generated." In some states, other items such as aerosol cans, lighting ballasts and electronic scrap can also be recycled using the Universal Waste Rule.

**Q: Why should my company recycle?**

**A:** By applying the Universal Waste Rule to your hazardous waste items, the Hazardous Waste Manifest and a Hazardous Waste hauler are not required. Note that these wastes must still be tracked using a shipping document to a permitted "Destination Facility." These facilities have state and federal permits to ensure that wastes are properly recycled to remove the hazardous components.

Hazardous components in your waste (i.e. mercury) must be removed to prevent them from contaminating the environment. Mercury is a "PBT Chemical" (**P**ersistent, **B**ioaccumulative, **T**oxin), which means it accumulates in biological organisms (such as fish and humans) if they are exposed to it. Mercury can cause birth defects and other maladies. Mercury does not evaporate and leave the environment. If not recycled for its intended use, but released through improper disposal, it will contaminate the environment for years to come.

By properly recycling hazardous materials, you are eliminating the environmental pollution and the human exposure of the hazardous components of the waste. Also, you are ensuring that your company is not subject to long-term and costly superfund liability concerns caused by improper disposal of hazardous waste.

**Q: What if I choose not to recycle?**

**A:** If you dispose your Universal Wastes in a dumpster or non-hazardous waste landfill, your company could find itself facing environmental violations with monetary penalties attached, of up to \$25,000 per incident, per day. State and environmental officials inspect businesses for proper management of Universal Waste disposal.

Remember, Universal Wastes may be common, but they are found in great volumes of wastes and cause a great deal of environmental pollution if discarded improperly. That pollution could wind up in and around your dumpster or in a surrounding waterway if you do not do the right thing and recycle. This makes your company potentially liable for costly clean-up and remediation.

**Q: How is my organization classified in the Universal Waste Regulation?**

**A:** The Universal Waste regulations use the term "handler" versus the hazardous waste regulations term, "generator.". There are two categories of Universal Waste handler:

**Small Quantity Handler** - Accumulates a total of not more than 5000 kg (approximately 11,000 lbs.) of Universal Waste on-site at any given time.

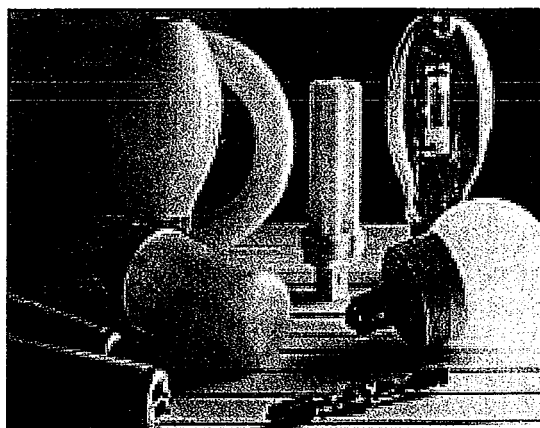
**Large Quantity Handler** - Accumulates more than 5000 kg (approximately 11,000 lbs.) of Universal Waste on-site at any given time. Note that large quantity handlers must have an EPA ID number for their site and follow a more stringent employee training program.

**Q: Are there any exemptions?**

**A:** Though there is mention of possible exemptions in the regulations, Pennsylvania does not allow the landfilling of hazardous and universal wastes within the state (per PA Code, Title 25, Part 261.a.5). Simply put, recycling is the only compliant choice in Pennsylvania.

**Q: What about low mercury lamps?**

**A:** To determine whether a mercury-containing waste such as a lamp is considered hazardous, there is a test used call the TCLP test (Toxicity Characteristic Leachate Procedure). A low-mercury lamp may or may not fail the TCLP test so it may or may not be a hazardous waste. The only way to tell for sure is to test every lamp that is discarded. This is a costly option compared to simply recycling.



In addition, every fluorescent lamp that exists contains mercury. If that lamp is discarded into a dumpster, you create a potential health and safety exposure risk for the employee discarding (and probably breaking) the lamp. You also directly contaminate your property with mercury.

**Q: How do I get started with a program?**

**A:** Your Universal Waste recycler has developed programs that are user-friendly and EASY - they do everything from preparing shipping documents and labels, to scheduling your pick-up, to loading the truck. They will even provide you with Certificates of Recycling to show that your materials have been properly recycled. Take the time to talk to them or pay them a visit to see their operations. They will help answer all of your questions and get you what you need to start your recycling program today.

For further information regarding Pennsylvania regulations on Universal Waste, you can contact:  
DEP Emergency Response Hotline at 1-800-541-2050 or  
DEP General Information Hotline at 1-717-783-2300.  
The PA code is available online at [www.pacode.com](http://www.pacode.com). Search "Title 25 Environmental Protection."  
The EPA website offers "Streamlined Regulations for Universal Waste" at [www.epa.gov/epaoswer/hazwaste/id/univwast.htm](http://www.epa.gov/epaoswer/hazwaste/id/univwast.htm)

This fact sheet was developed by the Professional Recyclers of Pennsylvania, P.O. Box 25, Bellwood, PA 16617. For more information, visit our website, [www.proprecycles.org](http://www.proprecycles.org), or contact us by email at [prop@proprecycles.org](mailto:prop@proprecycles.org). Portions of this fact sheet were adapted from a Winter 2006 The Pennsylvania Recycler magazine article written by Bonnie Swavely, Regional Sales Manager for AERC - a full service recycler of mercury-containing products batteries, ballasts and electronic scrap. We do our part to close the recycling loop and print all our publications on recycled paper.