

newjersey **nj dep**
department of environmental protection

Universal Waste Handler Inspector Perspective

Martin E. Sánchez

Principal Environmental Specialist

Northern Regional Office

Hazardous Waste Compliance & Enforcement

7 Ridgedale Avenue

Cedar Knolls, NJ 07927

martin.sanchez@dep.state.nj.us

(973) 656-4470

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)



UW Lamps broken & NOT stored in a proper container

Another example on how NOT to store UW Lamps





UW lamps NOT properly closed

06/18/2008

Universal Waste - Lamps



Examples of Proper Containers

Universal Waste - Batteries



05/07/2008

Labeling Universal Wastes

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
- Acceptable wording examples include
Universal Waste - Lamps or Used Lamps

Universal Waste - Consumer Electronics not properly marked



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

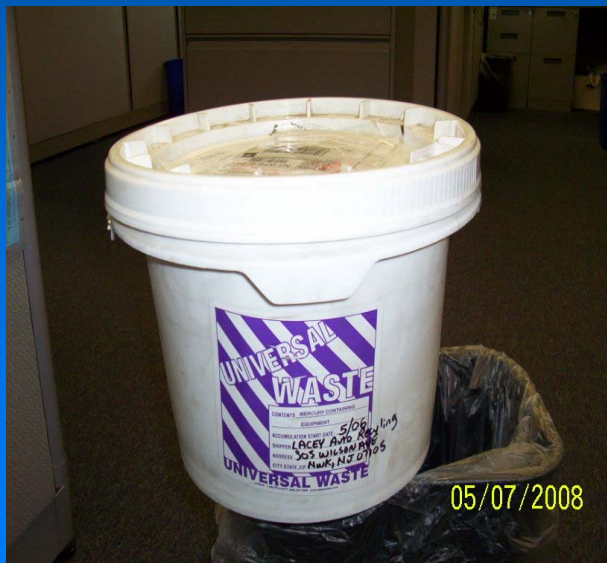


06/18/2008

Examples of Labeling / Marking Universal Waste

- Link for labels

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



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
- Another simple way is to keep an inventory log of the universal waste kept on-site

UNIVERSAL WASTE

CONTENTS CRT - WASTE
(MONITOR)

ACCUMULATION START DATE 10/18/04

SHIPPER B46-134

ADDRESS _____

CITY, STATE, ZIP _____

AWAF PICK-UP DATE: 10/18/04



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

DON'T TRASH FLUORESCENT LIGHT BULBS!

Take them to a Universal Waste
Collection Center or Recycle
Compact Fluorescent Lamps
at a participating retail store.

For more information, visit
www.epa.gov/fluorescent

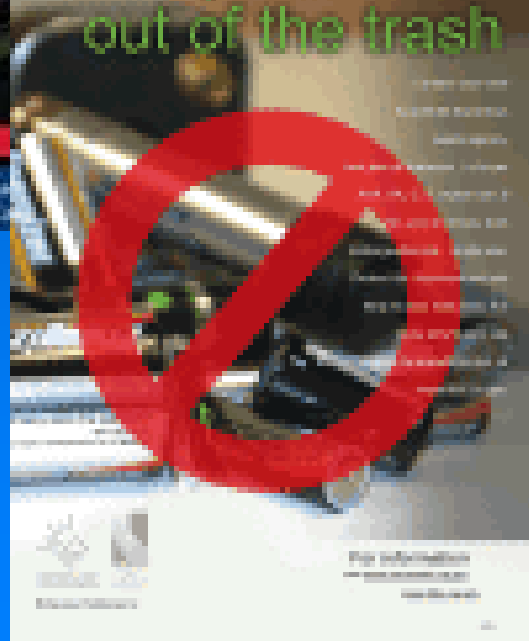
KEEP YOUR TRASH TOXIC-FREE



NO

**BATTERIES,
LIGHT BULBS,
ELECTRONICS,
OR MERCURY**

Keep batteries
out of the trash



RECYCLE

- LAPTOPS
- TELEVISIONS
- COMPUTER MONITORS
- AUTOMOBILE BATTERIES
- RECHARGEABLE BATTERIES
- MERCURY ITEMS
 - THERMOMETERS
 - THERMOSTATS
 - SWITCHES
 - FLUORESCENT BULBS



IT'S THE LAW

NO DUMPING Universal Waste

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???

