Universal Waste Handler Inspector Perspective

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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
Examples of Proper Containers

Universal Waste - Lamps

Universal Waste - Batteries
Labeling Universal Wastes
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.
Examples of Labeling / Marking Universal Waste

- Link for labels
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 - 13A

ADDRESS

CITY, STATE, ZIP

HWAF 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:

• 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 ladings 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???