

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 & <u>NOT</u> stored in a proper container

Another example on how <u>NOT</u> to store UW Lamps



UW lamps NOT properly closed

06/18/2008

PHU

Chickenson

Fluorescent

Universal Waste - Lamps

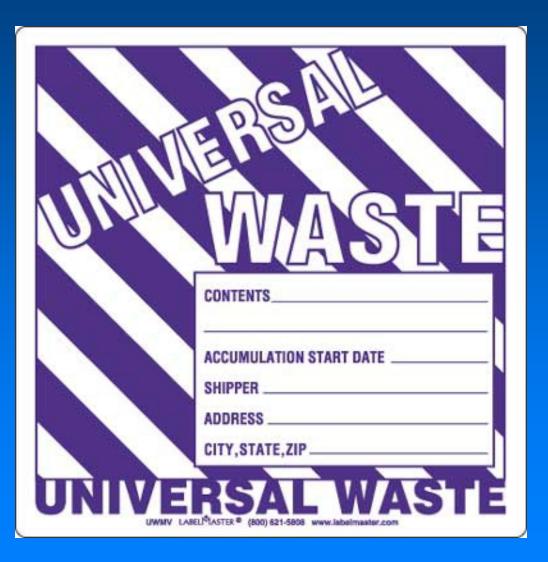


Examples of Proper Containers

05/07/2008



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 - Electronic Equipment & Batteries not properly marked

09/15/2004

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

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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
ACCUMULATION START DATE 10/18/04 SHIPPER BAG - 134
ADDRESS
CITY, STATE, ZIP HILDAF 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 perticipating retail store. Yes law teams from

Keep batteries out of the trash

RECYCLE

i den la Contra

LAPTOPS TELEVISIONS COMPUTER MONITORS AUTOMOBILE BATTERIES RECHARGEABLE BATTERIES MERCURY ITEMS

- THERMOMETERS
- THERMOSTATS
- SWITCHES
- FLUORESCENT BULBS

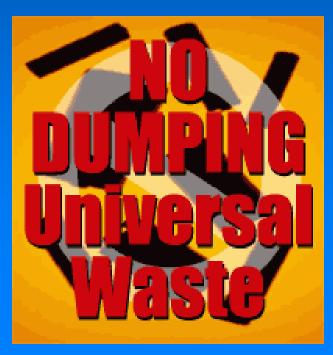






KEEP YOUR TRASH TOXIC-FREE





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
 <u>http://www.nj.gov/dep/enforcement/hw-chklists.html</u>
- Inspection Reports
 <u>http://www.nj.gov/dep/opra/online.html</u>
- 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???

