



National Park Service Commercial Services Program Universal Waste Management



What is Universal Waste?

Universal wastes are certain hazardous waste types that are eligible for streamlined management under 40 CFR 273, as they are common across all types of facilities and industries and there are available recycling markets.

- Spent or discarded batteries, such as lead acid, nickel-cadmium, and lithium batteries
- Certain pesticides, including recalled pesticides or those collected for a waste pesticide collection program
- Spent or discarded lamps, such as fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps
- Broken or discarded mercury-containing equipment, such as thermostats, switches, thermometers, and pressure gauges
- Discarded aerosol cans used for dispensing a broad range of products including paints, solvents, pesticides, food, personal care products, and others

States may have additional universal wastes, such as antifreeze, barometers, cathode ray tubes, electronic waste, oil-based finishes, paint and paint related wastes, and solar panels. Check your state regulations for more information.



Quantity Handler Categories

- Small Quantity Handlers (SQHs) accumulate **less than 11,000 lbs.** of universal waste at any one time.
- Large Quantity Handlers (LQHs) accumulate **11,000 lbs. or greater** of universal waste at any one time. Once a handler triggers the LQH status, it will remain an LQH for the remainder of the calendar year.

Notification

- LQH concessioners must notify the U.S. Environmental Protection Agency (EPA) of its status as an LQH and receive an EPA ID Number before meeting or exceeding the 11,000-pound limit.

Universal Waste Containers

- Containers must be closed, structurally sound, adequate to prevent breakage, compatible with the contents, have no evidence of leakage or spillage, and have no evidence of damage that could cause leakage.
- Containers must be labeled or marked clearly as "Universal Waste [waste type]," "Waste [waste type]" or "Used [waste type]."
- In place of labeling the container, facilities may also choose to:
 - Label the individual units (i.e., battery)
 - Mark the storage area
- Facilities must label containers with the date the first piece of universal waste was added.

Accumulation

- Universal waste must be properly disposed of within one year from the date it becomes waste.
- May be stored longer than one year only for the purpose of accumulating quantities to facilitate proper recovery, treatment, or disposal (e.g., unable to fill a container in one year).

Spills and Releases

- Spills and releases must be contained as soon as possible according to the requirements of the operating plan.
- Determine whether the spill or release is a universal waste or hazardous waste to establish proper disposal procedures.

Training Requirements

- Concession employees must be trained in proper handling and emergency response procedures appropriate for the types of universal waste handled at the facility.

Recordkeeping

- It is a best management practice to maintain all records of universal waste shipments with:
 - Name and address of the universal waste transporter, destination facility, or foreign destination where universal wastes were sent
 - Quantity of each type of universal waste in a shipment
 - Date of shipment(s)
- If the concessioner is an LQH, all records of universal waste shipments must be retained for at least three years.

Shipment Requirements

- Shipments must be sent only to an approved recycling/disposal facility or another universal waste handler.
- Do not dispose of, dilute, or treat universal waste.
- Do not store universal waste shipments at a transfer facility for more than 10 days.

Please note, this fact sheet does not cover all requirements and situations related universal waste management. In addition to checking federal regulations, be sure to check your state and local regulations. For any operational questions or emergency situations, please contact your park concession specialist. For more information pertaining to compliance with emergency planning and reporting requirements, please email cs_envaudits@nps.gov or contact the applicable regulatory authority.