

ENVIRONMENTAL Fact Sheet



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Universal Waste: Information for Small Handlers

New Hampshire's Universal Waste Rule allows facilities to transport, handle and recycle certain common hazardous wastes, termed universal wastes, in a manner that differs from the requirements for most hazardous wastes. The more relaxed requirements for managing universal wastes were adopted because they pose a low risk relative to other hazardous wastes and are generated by a wide variety of businesses. The Universal Waste Rule ([Env-Hw 1100](#)) includes requirements that apply to small, large, and very large quantity "universal waste handlers"; however, since most of the New Hampshire facilities that manage universal waste fall into the "small quantity handler" category, this fact sheet focuses primarily on those requirements.

What is a small quantity handler?

A "universal waste handler" is defined as: a) A generator of universal waste; or b) The owner or operator of a facility who receives universal waste from other universal waste handlers, accumulates universal waste, or sends universal waste to another universal waste handler, destination facility, or a foreign destination.

A "small quantity handler" is defined as: a universal waste handler who accumulates less than 5,000 combined total kilograms (11,000 pounds) of universal waste listed in the definition of "universal waste" onsite at any one time.

What are universal wastes?

Universal wastes are hazardous wastes that are widely produced by households and many different types of businesses. Any unwanted item that falls within one of these waste streams can be handled, transported and recycled following the less stringent requirements set forth in the universal waste rules. Universal wastes are:

- 1. Batteries** – Batteries contain one or more of the following eight metals: mercury, cadmium, lead, zinc, manganese, nickel, silver and lithium. When a battery is disposed of in a solid waste landfill or incinerator, the battery can leach its toxic constituents and contaminate air, soil, surface water and groundwater. Additional information can be found in Fact Sheet HW-18: "[Universal Waste - Batteries: Management Requirements for Handlers and Transporters.](#)"
- 2. Pesticides** – Pesticides are any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant. Pesticides can be managed as universal wastes if they are subject to certain recalls or collection programs as defined in the Universal Waste Rules.
- 3. Mercury-Containing Devices** – A number of devices contain mercury and may pose a hazard to human health or the environment when improperly managed. Examples of mercury-containing devices include certain types of thermostats, thermometers, switches and relays. Additional information can be found in Fact Sheet HW-17: "[Waste Mercury-Containing Devices: Management Requirements for Handlers and Transporters.](#)"
- 4. Lamps** – Lamps are defined as the bulb or tube portion of an electric lighting device. Examples of common universal waste lamps include, but are not limited to, fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps that contain small amounts of mercury and other hazardous metals. Additional information can be found in Fact Sheet HW-7: "[Waste Mercury-Containing Lamps: Management Requirements for Handlers and Transporters](#)" or Fact Sheet HW-28: "[Universal Waste Lamps: Information for Small Businesses.](#)"

5. **Cathode Ray Tube (CRT)** – CRTs are a glass tube used to provide the visual display in televisions, computer monitors, and certain scientific instruments, such as oscilloscopes. The glass in CRTs may contain hazardous materials such as lead, cadmium, barium.

6. **Antifreeze** – Antifreeze is used as an engine coolant and commonly consists of an ethylene glycol or propylene glycol base that is used as protection against freezing, overheating, and corrosion of the cooling system of an internal combustion engine. During its use, antifreeze may become contaminated with benzene from fuel, lead and other hazardous constituents that cause used antifreeze to be characterized as a hazardous waste. Additional information can be found in Fact Sheet HW-4: "[Waste Antifreeze: Management Requirements for Handlers and Transporters.](#)"

7. **Aerosol cans** – Non-empty aerosol cans that will no longer be used may be hazardous wastes if they contain a product and/or propellant that is hazardous. Aerosol cans are not hazardous wastes when they have been emptied of contents by using the product for its intended purpose and are able to be disposed of as solid waste. Additional information can be found in Fact Sheet HW-37: "[Universal Waste: Aerosol Can Management for Businesses.](#)"

What does a Small Quantity Handler need to comply with?

Although each category of universal waste has some unique waste management requirements, small quantity handlers must manage all universal wastes according to the general requirements in [Env-Hw 1102 and Env-Hw 1103](#), including:

1. **Storage:** Universal waste must be stored for less than one year, unless the business has written documentation to prove that longer storage time is necessary to facilitate proper recovery, treatment or disposal. The handler must be able to demonstrate compliance with this time limit, for example labeling the container with the earliest date waste was placed in the container or using an inventory system.
2. **Containers:** Universal waste (except for CRTs) shall be stored in containers that are compatible with the waste, in good condition, and closed at all times except when waste is being added to or removed from the container. If containers are stored outside, they must be covered to protect them from precipitation.
3. **Labeling:** Label or mark the universal waste (or container holding the universal waste) to indicate that it is a waste or universal waste. For example, universal waste lamps should be marked as "Universal Waste Lamps," "Waste Lamps," or "Used Lamps."
4. **Leaking, Spilled or Broken Universal Waste:** Leaking, spilled or broken universal waste must be cleaned up and placed in a suitable container. A hazardous waste determination must be performed, and the cleanup material must be managed as a solid or hazardous waste, based on the determination. In general, only intact universal waste can be managed as universal waste. However, if a universal waste item breaks (not purposefully) or leaks after being placed inside the container, it may still be managed as universal waste as long as the container remains closed.
5. **Training:** All employees who handle or manage universal waste must be informed of proper handling and emergency procedures.
6. **Disposal:** Small quantity handlers may only send or take universal waste to another universal waste handler, a destination facility (that treats, disposes of, or recycles universal waste), or a foreign destination after receiving approval from the receiving entity. Small quantity handlers can either self-transport their own universal waste or hire a commercial transporter.
7. **Recordkeeping:** Keeping records of shipments is recommended but not required.

For More Information

Questions regarding this fact sheet should be directed to the NHDES Hazardous Waste Management Bureau at [\(603\) 271-2942](tel:6032712942) or toll-free within New Hampshire at [866-HAZWAST](tel:866HAZWAST) (M-F 8 a.m.-4 p.m.) or email hwcomp@des.nh.gov. For a complete description of the requirements, refer to the New Hampshire Hazardous Waste Rules, Env-Hw 100-1200, available from [NHDES' website](#).