

# EHS FACT SHEET

## Universal Waste

### Universal Waste Definition

Universal wastes (UW) are hazardous wastes that can be managed in a manner following simple rules in place of the more complex hazardous waste requirements. The UW rules have been developed to promote recycling and to ensure proper disposal by relaxing some of the regulatory requirements. If a facility is not going to manage a UW under these relaxed regulations then the materials must be managed according to the applicable hazardous waste regulations. This guidance is intended to help identify and properly manage UW at your facility.

### Types of Universal Waste

#### Lamps

Lamps are defined as the bulb or tube portion of an electric lighting device. Lamps can be a hazardous waste because they contain heavy metals like mercury, lead or cadmium. Examples of universal waste lamps include incandescent, fluorescent, high intensity discharge, neon, mercury vapor, and high-pressure sodium and metal halide lamps. Many of these lamp types are commonly used at OSU.



#### Mercury-Containing Devices

Mercury-containing devices are any devices that contain metallic mercury. Examples of mercury containing devices in our facilities include barometers, manometers, commercial thermostats, switches for pumps, and thermostats for operating equipment and thermometers.

#### Discarded Batteries

UW batteries are devices consisting of one or more electrically connected electrochemical cells that are designed to receive, store and deliver electric energy. Examples of UW batteries include nickel-cadmium and lead-acid type batteries. Batteries that are considered to be UW and typically used include those on fork lifts, two-way radios, and emergency lighting/exit signs.



#### Pesticides

A pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Though often misunderstood to refer only to insecticides, the term pesticide also applies to herbicides, fungicides, and various other substances used to control pests. Under United States law, a

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pesticide is also any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.

### RESPONSIBILITIES

A UW handler is a person or an entity that generates universal waste. UW handlers are classified as small or large handlers based on the quantity of UW accumulated at any time. Generators are considered to be one of two categories:

- Small quantity handlers - accumulating less than 11,023 pounds (5,000 kilograms) of UW at any time
- Large quantity handlers - accumulating more than 11,023 pounds (5000 kilograms) of UW at any time

Universal Wastes are managed through the Office of Environmental Health and Safety's (EHS) Hazardous Waste Program. Generators of such waste can make a request to EHS to pick up these materials, as well as to provide containers for their storage to facilitate transport. Following a formal pickup request, EHS Hazardous Waste staff pickup and transport the Universal Waste to a central collection point on campus for processing and consolidation. The University has a contract with a company that picks up the materials on a routine basis and transports the materials to their recycling facilities where they are further processed and the valuable components are recycled and placed back into commerce. To submit a request to have universal waste picked up from your location, go to: <https://ehs.osu.edu/secure/apps/>



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### PROCEDURES

The following are requirements for generators of UW:

1. Containers holding UW must be labeled as to their contents (i.e. batteries, lamps, thermostats) and the words UNIVERSAL WASTE.
2. Containers must be closed during storage, not leaking and structurally sound.
3. Containers holding UW must be labeled as to their contents (i.e. batteries, lamps, thermostats) and the words UNIVERSAL WASTE.
4. Containers must be closed during storage, not leaking and structurally sound.
5. Containers must have the start date of accumulation (the date the first bulb, battery, etc. is placed in the container).
6. Containers must be kept in a designated area.
7. Employees who handle or have responsibility for managing universal waste must be trained in proper UW management. The training information must describe proper handling and emergency procedures appropriate to the type(s) of UW handled at the facility.
8. UW must be disposed through the EH&S Department.
9. Requests for UW pick up and/or container requests should be made online at: <https://ehs.osu.edu/secure/apps/>, you may need to register an account if you do not already have one.

**NEED MORE INFORMATION?**

[OSU UW Program](#) | [Ohio EPA](#)

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