

Universal Waste Consolidation Point Regulation

The universal waste management standards of 40 CFR Part 273 outline the streamlined provisions for handlers, transporters, and destination facilities that manage universal wastes. Section 273.6 defines a universal waste as hazardous batteries, pesticides, and thermostats. A handler, defined as a generator of universal waste (i.e., any person, by site, whose act or process produces hazardous waste or whose act first causes waste to become subject to regulation) is allowed to accumulate waste on site for up to one year. If a facility is not a generator of universal waste, yet is receiving universal waste and functioning as a consolidation and/or collection point, would the facility be regulated under the universal waste regulations?

Yes, the facility would be regulated under the universal waste regulations if it is consolidating and/or collecting universal waste from generators or other handlers. The definition of a universal waste handler includes facilities that receive universal waste from other handlers (273.6). A facility is allowed to consolidate and/or collect universal waste, provided the waste is sent on to other handlers, recyclers, or treatment/disposal facilities (60 FR 25500; May 11, 1995). Moreover, if the facility has several locations at which universal wastes are consolidated and/or collected, each location would be regulated as a separate handler. Additional RCRA requirements may apply if the facility is handling other types of hazardous waste (i.e., non-universal waste).