

1. Universal Waste Storage Time Limits & Multiple Handlers

The universal waste management standards of 40 CFR Part 273 outline streamlined provisions for managing universal wastes. Section 273.6 defines a universal waste as hazardous waste batteries, canceled pesticides, and mercury thermostats. A generator of universal waste, or a facility that receives universal waste from offsite and sends the waste to another universal waste participant, may meet the definition of a universal waste handler. Facilities which meet the definition of a universal waste handler may accumulate universal waste for up to one year from the date the waste is generated or received from another handler. Since handlers may then transport the universal waste to other off-site handlers, can each individual handler take advantage of the one-year accumulation provision?

When universal waste is transferred and accumulated by multiple handlers, each individual handler may utilize the one-year accumulation provisions of §§273.15 and 273.35, since each location at which universal wastes are consolidated and/or collected is regulated as a separate handler. Accumulation of universal waste by a handler for a period over one year may be allowed if the handler can prove such activity is solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal (§§273.15(b) and 273.35(b)).