



## Requirements for Handlers of Universal Waste Technical Guidance Document HW-2001-G1

This technical guidance document describes some of the basic requirements for handlers of universal waste, including notification. The more general requirements for notification of hazardous waste activities are contained in K.A.R. 28-31-4, and are not covered in this technical guidance document. 40 CFR Part 273, Standards for Universal Waste Management, is adopted in Kansas by KAR 28-31-273.

### Universal Waste

Certain widely-generated hazardous wastes have been designated as universal waste. This designation allows universal waste handlers to manage universal waste under the streamlined requirements of 40 CFR 273 instead of the more stringent RCRA Subtitle C requirements for hazardous waste. Universal waste includes:

- Hazardous waste batteries;
- Certain hazardous waste pesticides;
- Mercury-containing equipment; and
- Hazardous waste lamps.

### Handlers of Universal Waste

There are several categories of universal waste handlers. A generator of universal waste is a universal waste handler. The owner or operator of a facility that receives universal waste from other handlers and accumulates the universal waste before sending it to another universal waste handler or to a destination facility or to a foreign destination is also a universal waste handler.

Two classes of universal waste handlers are identified in the regulations:

- A Small Quantity Handler of Universal Waste (SQHUW) is a handler who accumulates less than 5,000 kilograms (11,000 pounds) of universal waste at any time.
- A Large Quantity Handler of Universal Waste (LQHUW) is a handler who accumulates 5,000 kilograms or more of universal waste at any one time.

### Requirements for SQHUWs

SQHUWs must manage universal waste in an environmentally responsible manner as described in 40 CFR 273, Subpart B, but are not required to obtain an EPA ID number or to notify the Kansas Department of Health and Environment (KDHE) concerning universal waste activities.

### Requirements for LQHUWs Management of Universal Waste

LQHUWs are prohibited from:

- 1) Disposing of universal waste as regular trash; and
- 2) Diluting or treating universal waste, unless:
  - a) The handler is managing specific wastes (see 40 CFR 273.33); or
  - b) There is an emergency situation.

### Notification Requirements

Each LQHUW must submit written notification of universal waste generation/management to the KDHE Bureau of Waste Management (BWM), before meeting or exceeding the 5,000 kilogram (11,000 pounds) storage limit. There are two exceptions to this requirement:

- 1) If the LQHUW has already notified BWM concerning hazardous waste management activities and has received an EPA identification number, there is no requirement to notify BWM again for universal waste.
- 2) An LQHUW who manages recalled universal waste pesticides as described in 40 CFR 273.3(a)(1) and who has met the

requirements of 40 CFR 165 is not required to notify for those recalled pesticides.

The notification form can be downloaded from the BWM website at:

[www.kdheks.gov/waste/forms\\_hazwaste.html](http://www.kdheks.gov/waste/forms_hazwaste.html).

The form name is "GEN500-Notification of Regulated (Hazardous Waste) Activity Form."

A copy can also be obtained by writing to the address contained in the heading of this document, or by calling the telephone number listed below.

For additional information regarding proper management of solid or hazardous waste, you may contact the Bureau of Waste Management at (785) 296-1600 or the address at the top of this document, or visit the Bureau's website at <http://www.kdheks.gov/waste/>.