



Environmental Health, Safety, and Risk Management

PO Box 758145
Fairbanks, Alaska 99775
474-5413, fax 474-5489

UNIVERSAL WASTE BATTERIES INFORMATION

Background:

An alternative set of management standards, in lieu of regulation under 40 CFR parts 260-272 (hazardous waste regulations), are identified in 40 CFR part 273, Standards for Universal Waste Management. This part establishes requirements for managing batteries (as described in 273.2), pesticides (as described in 273.3), thermostats (as described in 273.4) and lamps (as described in 273.5). The universal waste regulations include seven subparts. A brief description of four of these subparts follows:

1. **Small quantity handlers** (SQHUW's); 5000 kg or less of total universal waste handled at one time. Notification to EPA is not required, shipments are not required to be manifested, no record retention requirement.
2. **Large quantity handlers** (LQHUW's); greater than 5000 kg of total universal waste at one time. Must notify EPA of universal waste activity, obtain an EPA ID number (if they don't already have one) and retain off-site shipment records for 3 years. This can be a logbook, invoice, manifest, bill of lading or other shipping document.
3. **Transporters of universal waste batteries**; must be done in accordance with Department of Transportation regulations found at 49 CFR part 171-180.
4. **Destination Facilities**; regulations found at 40 CFR 273.60.

The management requirements for SQHUW's are found at 40 CFR 273.13 and include the following:

- a. **Packaging requirements:**
A small quantity handler of universal waste must contain any universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

- b. Labeling requirements:
Universal waste batteries (i.e.; each battery), or a container in which batteries are contained, must be labeled or marked clearly with any one of the following phrases: “Universal Waste Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”
- c. Accumulation time limitations:
A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler. The handler must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or was received.
- d. Employee training:
A small quantity handler of universal waste must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.
- e. Responses to releases:
A small quantity handler of universal wastes must immediately contain any releases of universal waste and other residues from universal wastes. Determine whether or not any of the material resulting from the release is hazardous waste, and if so, compliance with all applicable requirements of 40 CFR parts 260-272 is required.

Standard Operating Procedures:

1. Call EHSRM, Hazmat Section (474-5617 or 474-5758) to obtain battery collection containers with lids. Mixing battery types is permissible under SQHUU regulations found at 40 CFR 273.13(a)(2)(ii).
2. Ensure that each collection container is marked with the words, “Universal Waste Batteries,” and that each collection container is marked with the date that the accumulation of batteries began. (Container labels are available from EHSRM, Hazmat Section).
3. Ensure that the collection containers are closed at all times unless adding or removing.
4. In writing, identify the location of the battery collection container(s) under your control to EHSRM, Hazmat Section.

5. EHSRM, Hazmat Section will be responsible for the quarterly removal of batteries from these locations and will segregate universal waste batteries by battery type.

Contact EHSRM, Hazmat Section (474-5617) with any special needs, i.e.; removal of large (i.e.: automotive size) lead-acid, Ni-Cd, air-alkaline or other batteries.