



WASTE MANAGEMENT - UNIVERSAL WASTE

ENVIRONMENTAL GUIDELINES



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PURPOSE

The purpose of the guideline is to provide guidance on what DEN's expectations are for the management of Universal Waste. This Environmental Guideline is to help prevent the improper handling of items classified as Universal Waste, while promoting the safe handling and diversion of these materials from the landfill where possible. This is a compliance obligation for DEN.

ACTIVITY DESCRIPTION

The activity of properly identifying, storing, handling, transporting, and disposing of universal waste. Although universal waste is a subset of hazardous waste, universal waste consists mainly of everyday items in widespread use. Universal waste includes:

- Batteries;
- Aerosol cans;
- Pesticides;
- Mercury-containing devices (such as mercury thermostats);
- Mercury-containing lighting (such as fluorescent bulbs); and
- Electronic devices and components (such as computers, monitors, and LED lights).

In order to be classified as a universal waste, a waste must first be classified as a hazardous waste. The Department of Aviation assumes all the above waste streams meet definitions of hazardous waste and chooses to manage those waste streams under the less-stringent universal waste regulations, instead of the more-stringent hazardous waste regulations, as allowed by federal and state law. The Department of Aviation believes it does not purchase new mercury-containing devices and therefore does not generate waste mercury-containing devices.

Classifying and managing the above waste streams as universal wastes is intended to encourage their recycling. Economical recycling options exist for most of these wastes. In addition, classifying material as universal waste means that they are subject to less stringent management requirements than those for hazardous waste.

EXPECTATIONS

Best Practices

- Identify materials requiring universal waste management.
- Characterize and properly manage universal waste.
- Segregate universal waste as appropriate.



- Generate and maintain a profile with the recycling/disposal facility for all universal waste.
- Maintain legible labels and markings on all containers and tanks; labels on all containers must have the name of the owner of the container and an associated contact telephone number and must clearly indicate the contents; The labeling shall conform to CDPHE HMWMD requirements including the owner, the owner USEPA ID Code, RCRA description of waste and applicable codes, facility address, the start date for when the container is first used for accumulation.
- Waste accumulation – manage to prevent releases; one-year accumulation time limit;
- Waste shipment – no manifest required; other evidence of shipping recommended;
- Notification – SQH not required to notify the Colorado Department of Public Health and Environment (CDPHE); LQH must notify CDPHE and obtain an EPA Id. Number;
- Training – SQH employees must be informed of proper handling and emergency procedures; LQH employees must be thoroughly familiar with universal waste management requirements and emergency response appropriate to their level;
- Spills – immediately containerize and appropriately manage any spills, residues, or releases of universal wastes; be aware of the need to determine if a hazardous waste has been newly generated;
- Records – SQH not required to maintain records but should document waste management activities to evidence SQH status; LQH must keep written records of types and quantities of universal waste shipped and received for 3 years; no training records are required.

Shall Not

- Do not dispose of waste batteries, waste aerosol cans, waste pesticides, waste lamps, or waste electronic devices and components in a trash can or trash dumpster unless generator knowledge or other information confirms that the waste is not a hazardous or universal waste.

REFERENCES

Contacts

- DEN Communications Center (for spill reporting): 303-342-4200
- DEN Environmental Services (Main Line) : 303-342-2730; DENEnvironmental@flydenver.com

Additional Resources

- CDPHE Compliance Bulletins on Universal Waste
 - Universal Waste Rule
 - Aerosol cans
 - Batteries
 - Electronics (computers, etc.)
 - Lighting Waste



- Mercury containing Devices
- Material Safety Data Sheets (MSDS)
- E-waste recycling procedure
- DEN hazardous and universal waste management training
- Site specific waste management materials (if any)
- USEPA 40 CFR 273 (Federal universal waste regulations)
- US DOT 49 CFR 171-180 (Battery Shipping Instructions)
- CDPHE 6 CCR 1007-3, Part 273 (State universal waste regulations)
- DEN Rules and Regulation 180
- State solid waste use fee statute (C.R.S. 25-16-104.5)