

Information for Employees Managing or Handling Certain Universal Wastes

In a Nutshell

- 1) You must receive training to handle waste lamps (bulbs), batteries, pesticides, anti-freeze, thermostats and other mercury-containing devices
- 2) Label all packages containing these materials
- 3) Place a date on the package
- 4) Hold packages for no longer than one year

NR 673.16 Employee training. A small quantity handler of universal waste shall inform all employees who handle or have responsibility for managing universal waste. The information shall describe proper handling and emergency procedures appropriate to the types of universal waste handled at the facility.

EPA/Wisconsin Universal Wastes

Batteries as described in s. NR 673.02.
Pesticides as described in s. NR 673.03.
Thermostats as described in s. NR 673.04.
Lamps as described in s. NR 673.05.

Wisconsin-Specific Universal Wastes

Containers of mercury (< 1 lb.)
Sealed mercury-containing devices
Antifreeze

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Small handlers, that is, handlers who accumulate an aggregate of less than 11,025 pounds, must:

- 1) Manage the waste in a way that prevents releases
- 2) Ensure containers are closed, structurally sound and compatible with the contents
- 3) Label containers **Universal waste XXXXX** - Each XXXXX or a container in which the XXXXX are contained, shall be labeled or marked clearly with the phrase “Universal Waste—XXXXX”, “Waste XXXXX” or “Used XXXXX”¹
- 4) Accumulate Universal Waste for no longer than one year. Be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received (e.g., label each item with the date it became a waste or was received or label container with the earliest date a waste was added to the container.). For further information, see NR 673.15.
- 5) Dispose Universal Wastes in accordance with all Federal, State and local regulations. Ask your Environmental Officer for assistance.

SPILLS/ RELEASES

NR 673.17 Response to releases. (1) A small quantity handler of universal waste shall immediately contain all releases of universal wastes and other residues from universal wastes. **(2)** A small quantity handler of universal waste shall determine whether any material resulting from the release is hazardous waste, and if so, shall manage the hazardous waste in compliance with all applicable requirements of chs.

¹ Replace “XXXXX” with “Batteries”, “Mercury Thermostats”, “Lamps”, “Mercury”, “Sealed mercury-containing devices”, “Antifreeze”; Pesticide labeling varies somewhat – requirements may be found in NR 673.14(2)&(3)

NR 660 to 670. The handler is considered the generator of the material resulting from the release, and shall manage it in compliance with ch. NR 662.

What Never to Do with a Mercury Spill

- Never use a vacuum cleaner to clean up mercury. The vacuum will put mercury into the air and increase exposure.
- Never use a broom to clean up mercury. It will break the mercury into smaller droplets and spread them.
- Never pour mercury down a drain. It may lodge in the plumbing and cause future problems during plumbing repairs. If discharged, it can cause pollution of the septic tank or sewage treatment plant.
- Never wash clothing or other items that have come in direct contact with mercury in a washing machine, because mercury may contaminate the machine and/or pollute sewage. Clothing that has come into direct contact with mercury should be discarded. By "direct contact," we mean that mercury was (or has been) spilled directly on the clothing.
- Never walk around if your shoes might be contaminated with mercury. Contaminated clothing can also spread mercury around.

If a Small Number of Bulbs Break

- Carefully scoop up glass pieces and powder using stiff paper or cardboard and place them in a lamp box
- Use sticky tape, such as duct tape, to pick up any remaining small glass fragments and powder.
- Wipe the area clean with damp paper towels or disposable wet wipes. Place tape and towels in the box.
- Do not use a vacuum or broom to clean up the broken bulb on hard surfaces.
- If a large number of bulbs break or elemental "liquid" mercury spills, cleanup and disposal are more complicated. Contact your Environmental Officer for advice and assistance.

Emergency Phone Call List

Environmental Officer XXX-XXX-XXXX
Campus Police..... XXX-XXX-XXXX
Other XXX-XXX-XXXX

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I have read the above information concerning the handling and emergency procedures appropriate to the types of universal waste I will be handling.

Name: _____ Signature: _____

Position: _____ Date: _____