



MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

Materials Management Division

Universal Waste Small Quantity Handler

Under the authority of Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and Title 40 of the Code of Federal Regulations (CFR), Part 273, Standards for Universal Waste Management.

This document is used by EGLE inspectors and waste generators to determine compliance with Part 111.

Facility Name \_\_\_\_\_

Inspection Date \_\_\_\_\_ Site ID# \_\_\_\_\_ WDS# \_\_\_\_\_

NOTE: Small quantity handler (SQH) of universal waste means a universal waste handler who does not accumulate 5,000 kilograms (kg) or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, aerosol cans, antifreeze, or consumer electronics, calculated collectively) at any time.

The following checked sections are included for this inspection. If a section is not checked below, it is intentionally left blank.

- Section 1 - Prohibitions/Accumulation Time Limits
Section 1 - Accumulation Time Limits/Employee Training
Section 1 - Response to Releases/Off-Site Shipments
Section 2 - Management of Universal Waste Batteries
Section 3 - Management of Universal Waste Pesticides
Section 4 - Management of Universal Waste Mercury - Containing Equipment
Section 5 - Management of Universal Waste Lamps
Section 6 - Management of Universal Aerosol Cans
Section 7 - Management of Universal Waste Consumer Electronics
Section 8 - Management of Universal Waste Antifreeze

People with disabilities may request this material in an alternate format by emailing EGLE-Accessibility@Michigan.gov or calling 800-662-9278.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations.

This form and its contents are subject to the Freedom of Information Act and may be released to the public.

**Section 1 - Prohibitions/Accumulation Time Limits**

(C - Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	PROHIBITIONS 40 CFR 273	C	NC	NI	NA
273.11(a)	273B	SQH does not dispose of universal waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.11(b)	273B	SQH does not dilute or treat universal waste, except by responding to releases or by managing specific waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(C - Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	ACCUMULATION TIME LIMITS 40 CFR 273	C	NC	NI	NA
273.15(a)	273B	Universal waste has been accumulated for no longer than one year from the date the universal waste was generated or received from another handler. Date of oldest container:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.15(b)	273B	If SQH accumulated universal waste over one year, the accumulation is necessary to facilitate proper recovery, treatment, or disposal (burden on handler to demonstrate)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.15(c)(1-6)		<p>The handler has demonstrated the length of time the universal waste has been accumulated in one of the following ways:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received (1), OR</li> <li><input type="checkbox"/> Marking or labeling each individual item of universal waste (i.e., each battery or thermostat) with the date it became a waste or was received (2), OR</li> <li><input type="checkbox"/> Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received (3), OR</li> <li><input type="checkbox"/> Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received (4), OR</li> <li><input type="checkbox"/> Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received (5); OR</li> <li><input type="checkbox"/> Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received (6)</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Section 1 - Employee Training/Response to Release**

(C - Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	EMPLOYEE TRAINING 40 CFR 273	C	NC	NI	NA
273.16	273B	SQH has informed all employees who handle or have responsibility for managing universal waste of proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(C - Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	RESPONSE TO RELEASES 40 CFR 273	C	NC	NI	NA
273.17(a)	273B	SQH immediately contains all releases of universal wastes and other residues from universal wastes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.17(b)	273B	SQH determines whether any material resulting from the release is hazardous waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.17(b)	273B	If a released material is determined to be hazardous waste, SQH manages the hazardous waste in compliance with all applicable requirements of Part 111 and 40 CFR parts 260 through 272	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: If a released material is hazardous waste, the SQH is considered the generator and must manage it in compliance with 40 CFR part 262.

## Section 1 - Off-Site Shipments

(C - Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	OFF-SITE SHIPMENTS Part 111 R 228 and 40 CFR 273	C	NC	NI	NA
273.18(a)	273B	Universal waste is sent to any of the following: <input type="checkbox"/> another universal waste handler <input type="checkbox"/> a destination facility <input type="checkbox"/> a foreign destination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
R 228(4)(b)	273B	If SQH self-transportes universal waste off-site, the SQH complies with the universal waste transporter requirements of Part 111 Rule 228(6) while transporting the universal wastes.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.18(d)	273B	Prior to sending a shipment of universal waste to another universal waste handler, the SQH ensured that the receiving handler agreed to receive the shipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.18(e)(1-2)	273B	If a universal waste shipment is rejected by the receiving handler, or destination facility, the SQH either: <input type="checkbox"/> Received the waste back when notified that the shipment had been rejected (1) <input type="checkbox"/> Agreed with the receiving handler on a destination facility to which the shipment will be sent (2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.18(f)(1-2)	273B	If a handler rejected a shipment or a portion of a shipment, the handler contacted the originating handler to notify of the rejection and to discuss the following: <input type="checkbox"/> Sending the waste back to the originating handler (1) <input type="checkbox"/> Agreeing to where the shipment will be sent (2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.18(g)	273B	If SQH received shipment of hazardous waste that is not universal waste, the handler immediately notified Material's Management Division's District Supervisor, or designee, of the illegal shipment; and provided the name, address, and phone number of the originating shipper	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.18(h)	273B	If SQH received a shipment of non-hazardous, non-universal waste, handler managed the waste in accordance with applicable waste regulations (i.e., solid, liquid industrial, or medical waste)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: If SQH is self-transporting universal waste off-site, use the EGLE Transporter Inspection Checklist.

NOTE: An SQH of universal waste is not required to keep records of shipments of universal waste (CFR 273.19).

## Section 2 – Management of Universal Waste Batteries

(C - Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL WASTE BATTERIES 40 CFR 273	C	NC	NI	NA
273.13(a)	273B	Batteries are managed in a way that prevents releases to the environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(a)(1)	273B	Batteries that show evidence of leakage, spillage, or damage that could cause a leakage are placed in a container that meets the following criteria: <input type="checkbox"/> Closed <input type="checkbox"/> Structurally sound <input type="checkbox"/> Compatible with the contents of the battery <input type="checkbox"/> Lacks evidence of leakage, spillage, or damage that could cause leakage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(a)(2)(i-vii)	273B	SQH only conducts any of the following activities with batteries that are intact: <input type="checkbox"/> Sorting batteries by type (i) <input type="checkbox"/> Mixing battery types in one container (ii) <input type="checkbox"/> Discharging batteries so as to remove the electric charge (iii) <input type="checkbox"/> Regenerating used batteries (iv) <input type="checkbox"/> Disassembling batteries or battery packs into individual batteries or cells (v) <input type="checkbox"/> Removing batteries from consumer products (vi) <input type="checkbox"/> Removing electrolyte from batteries (vii)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(a)(3)	273B	If SQH removes electrolytes or generates other solid waste (e.g., battery pack materials, discarded consumer products), the SQH determined if the electrolyte and/or other solid waste exhibit a characteristic of hazardous waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(a)(3)(i)	273B	If the removed electrolyte and/or other solid waste exhibit a characteristic of hazardous waste, it is managed in compliance with 40 CFR 260 through 272. The handler is considered the generator of the hazardous electrolyte and/or other waste.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.14(a)	273B	Universal waste batteries ( <i>i.e.</i> , each battery), or a container in which the batteries are contained, are labeled, or marked clearly with any of the following phrases: <input type="checkbox"/> “Universal Waste—Battery(ies)” <input type="checkbox"/> “Waste Battery(ies)” <input type="checkbox"/> “Used Battery(ies)”	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: The requirements of this rule do not apply to any of the following:

- A spent lead-acid battery that is managed pursuant to the NREPA, Part 111, R 804.
- A battery that is not a waste under part 2 of Part 111. A used battery becomes a waste when it is discarded. An unused battery becomes a waste on the date the universal waste handler decides to discard it.
- A battery that is not hazardous waste. A battery is a hazardous waste if it exhibits one or more of the hazardous characteristics identified in the NREPA, Part 111, R 212.

NOTE: If the electrolyte or other solid waste is not hazardous, the handler may manage the waste in any way that is in compliance with applicable federal, state, or local solid waste regulations.

### Section 3 – Management of Universal Waste Pesticides

(C - Compliant; NC - Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL PESTICIDES 40 CFR 273	C	NC	NI	NA
273.13(b)	273B	SQH manages pesticides in a way that prevents releases to the environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(b)(1-4)	273B	Pesticides are contained in one or more of the following: A container that is: <input type="checkbox"/> Closed (1) <input type="checkbox"/> Structurally sound (1) <input type="checkbox"/> Compatible with the pesticide (1) <input type="checkbox"/> Lacking evidence of leakage, spillage, or damage that could cause leakage (1) <input type="checkbox"/> An overpacked container that meets the above requirements (2) <input type="checkbox"/> A tank that meets the requirements of 40 CFR, part 265, subpart J, except for 40 CFR 265.197(c), 200, and 201 (3) A transport vehicle or vessel that is: <input type="checkbox"/> Closed (4) <input type="checkbox"/> Structurally sound (4) <input type="checkbox"/> Compatible with the pesticide (4) <input type="checkbox"/> Lacking evidence of leakage, spillage, or damage that could cause leakage (4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.14(b)(1-2)	273B	A container (or multiple container package unit), tank, transport vehicle, or vessel in which recalled universal waste pesticides are contained is labeled or marked clearly with the following: <input type="checkbox"/> The label that was on or accompanied the product as sold or distributed (1) <input type="checkbox"/> The words “Universal Waste - Pesticide(s)” or “Waste Pesticide(s)” (2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.14(c)(1) (i-iii) and (2)	273B	A container, tank, or transport vehicle or vessel in which unused pesticide products are contained are labeled or marked clearly with the following: <input type="checkbox"/> The label that was on the product when purchased, if still legible (1)(i), OR <input type="checkbox"/> An appropriate label as required under the Department of Transportation regulation 49 CFR part 172 if the above label is not feasible (1)(ii), OR <input type="checkbox"/> Another label prescribed or designated by the pesticide collection program if the above labels are not feasible (1)(iii), <b>AND (continued on next page)</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL PESTICIDES 40 CFR 273	C	NC	NI	NA
		<input type="checkbox"/> The words “Universal Waste-Pesticide(s)” or “Waste Pesticide(s)” (2)				

NOTE: Aerosol cans that contain pesticides may be managed as aerosol cans universal waste.

NOTE: A pesticide is a hazardous waste if it is listed pursuant to the NREPA, Part 111, R213 or R 214, or if it exhibits one or more of the hazardous characteristics identified in R 212.

## Section 4 – Management of Universal Waste Mercury – Containing Equipment

(C - Compliant; NC - Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT 40 CFR 273	C	NC	NI	NA
273.13(c)(1)	273B	Mercury-containing equipment with non-contained elemental mercury, or that shows evidence of leakage, spillage, or damage that could cause leakage, is placed in a container that meets the following criteria: <input type="checkbox"/> Closed <input type="checkbox"/> Structurally sound <input type="checkbox"/> Compatible with the contents of the device <input type="checkbox"/> Lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment <input type="checkbox"/> Reasonably designed to prevent the escape of mercury into the environment by volatilization or any other means	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(c)(2)(i-vii)	273B	SQH removed mercury-containing ampules from universal waste mercury-containing equipment and met the following conditions: <input type="checkbox"/> Removed and managed the ampules in a manner designed to prevent breakage (i) <input type="checkbox"/> Removed the ampules only over or in a containment device (ii) <input type="checkbox"/> Had mercury clean-up system readily available to immediately transfer any mercury resulting from spills or leaks to a container that meets the requirements of 40 CFR 262.34 (iii) <input type="checkbox"/> Immediately transferred any mercury resulting from spills or leaks from broken ampules from the containment device to a container that meets the requirements of 40 CFR 262.34 (iv) <input type="checkbox"/> Ensured that the area in which ampules are removed is well ventilated and monitored to ensure compliance with applicable OSHA exposure levels for mercury (v) <input type="checkbox"/> Ensured that employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures(vi) <input type="checkbox"/> Stored removed ampules in closed, non-leaking containers that are in good condition (vii) <input type="checkbox"/> Packed removed ampules in the container with packing materials adequate to prevent breakage during storage, handling, and transportation(viii)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT 40 CFR 273	C	NC	NI	NA
273.13(c)(3)(i-ii)	273B	For devices that do not contain ampules, and the handler removed the original housings that hold mercury, the SQH <input type="checkbox"/> immediately sealed original housing to prevent a mercury release (i) <b>AND</b> <input type="checkbox"/> followed all ampule management requirements of 273.33(c)(2) (ii)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(c)(4)(i)(A-B)	273B	SQH determined if the following exhibited characteristics of hazardous waste: <input type="checkbox"/> Mercury or clean-up residues resulting from spills or leaks (A) <input type="checkbox"/> Any solid waste generated as a result of the removal of mercury-containing ampules or housings (B)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(c)(4)(ii)	273B	If the mercury, residues, and/or other solid waste exhibits a characteristic of hazardous waste, it is managed in compliance with 40 CFR 260 through 272	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.14(d)(1)	273B	Universal waste mercury-containing equipment (i.e., each device), or a container in which the equipment is contained, is labeled, or marked clearly, with any of the following phrases <input type="checkbox"/> "Universal Waste - Mercury-Containing Equipment" <input type="checkbox"/> "Waste Mercury-Containing Equipment" <input type="checkbox"/> "Used Mercury-Containing Equipment"				
273.14(d)(2)	273B	A universal waste mercury-containing thermostat or container containing only universal waste mercury-containing thermostats, is labeled, or marked clearly, with any of the following phrases: <input type="checkbox"/> "Universal Waste-Mercury Thermostat(s)" <input type="checkbox"/> "Waste Mercury Thermostat(s)" <input type="checkbox"/> "Used Mercury Thermostat(s)"				

NOTE: Universal Waste rules do not apply to a thermostat, mercury switch, mercury thermometer, and a waste device, which contains only elemental mercury as the hazardous waste constituent that is not hazardous waste. A thermostat, mercury switch, mercury thermometer, and a waste device, which contains only elemental mercury as the hazardous waste constituent is a hazardous waste if it exhibits one or more of the hazardous characteristics identified in the NREPA, Part 111, R 212.

NOTE: If the mercury, residues, and/or other solid waste is not hazardous, the handler may manage the waste in any way that is in compliance with applicable federal, state, or local solid waste regulations. (40 CFR 273.33 (c)(4)(iii))

## Section 5 - Management Of Universal Waste Lamps

(C - Compliant; NC - Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL WASTE LAMPS 40 CFR 273	C	NC	NI	NA
273.13(d)	273B	Lamps are managed in a manner that prevent releases to the environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(d)(1)	273B	Lamps are stored in containers or packages that meet the following criteria: <input type="checkbox"/> Structurally sound <input type="checkbox"/> Adequate to prevent breakage <input type="checkbox"/> Compatible with the contents of the lamps <input type="checkbox"/> Closed <input type="checkbox"/> Lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(d)(2)	273B	SQH immediately cleans up and places any lamp that is broken in packaging and places any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment in packaging that meets the following criteria: <input type="checkbox"/> Closed <input type="checkbox"/> Structurally sound <input type="checkbox"/> Compatible with the contents of the lamps <input type="checkbox"/> Lack evidence of leakage, spillage, or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.14(e)	273B	Each lamp, or a container or package in which such lamps are contained, is labeled, or marked clearly, with any of the following phrases: <input type="checkbox"/> "Universal Waste - Lamp(s)" <input type="checkbox"/> "Waste Lamp(s)" <input type="checkbox"/> "Used Lamp(s)"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: If the SQH uses a lamp crusher, the handler is required to obtain a permit from the EGLE Air Quality Division.

NOTE: A lamp is a hazardous waste if it exhibits one or more of the hazardous characteristics identified in Part 111, Rule 212.

## Section 6 - Management Of Universal Aerosol Cans

(C - Compliant; NC - Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL AEROSOL CANS 40 CFR 273	C	NC	NI	NA
273.13(e)	273B	Aerosol cans are managed in a manner that prevents releases to the environment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(e)(1)	273B	Aerosol cans are accumulated in a container that meets the following criteria: <input type="checkbox"/> Structurally sound <input type="checkbox"/> Compatible with the contents of the aerosol cans <input type="checkbox"/> Lacks evidence of leakage, spillage, or damage that could cause leakage <input type="checkbox"/> Protected from sources of heat.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(e)(2)	273B	Aerosol cans that show evidence of leakage are: <input type="checkbox"/> Packaged in a separate closed container, or <input type="checkbox"/> Overpacked with absorbents, or <input type="checkbox"/> Immediately punctured and drained	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(e)(3)(i-iii)	273B	SQH may conduct the following activities while ensuring each individual aerosol can is not breached and remains intact: <input type="checkbox"/> Sorting aerosol cans by type (i) <input type="checkbox"/> Mixing intact cans in one container (ii) <input type="checkbox"/> Removing actuators to reduce the risk of accidental release (iii)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
273.13(e)(4)(i-vii)	273B	If SQH punctures and drains aerosol cans, the empty punctured aerosol cans are <input type="checkbox"/> recycled <b>AND</b> the SQH meets the following requirements: <input type="checkbox"/> Puncturing and draining activities are conducted using a device specifically designed to safely puncture aerosol cans and effectively contain the residual contents and any emissions (i) <input type="checkbox"/> Establish and follow a written procedure detailing the following: <input type="checkbox"/> How to safely puncture and drain the aerosol can (including proper assembly, operation and maintenance of the unit, segregation of incompatible wastes, and proper waste management practices to prevent fires or releases) (ii) <input type="checkbox"/> Maintain a copy of the manufacturer's specification and instruction on-site (ii) <input type="checkbox"/> Ensure employees operating the device are trained in the proper procedures (ii) (Continued on next page)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL AEROSOL CANS 40 CFR 273	C	NC	NI	NA
		<input type="checkbox"/> Puncturing of the can is done in a manner designed to prevent fires and to prevent a release to the environment (iii) <input type="checkbox"/> The contents from the waste aerosol can or puncturing device are immediately transferred to a container or tank that meets applicable requirements (iv) <input type="checkbox"/> A hazardous waste determination has been conducted on the contents of the emptied aerosol can (v) <input type="checkbox"/> If hazardous waste is generated as a result of the puncturing and draining of aerosol cans, the material is managed in compliance with Part 111 and 40 CFR 260 through 272 <input type="checkbox"/> SQH has written procedure is in place to address spills or leaks and a spill clean-up kit is provided (vii) <input type="checkbox"/> All spills or leaks of the contents of the aerosol cans are cleaned up promptly (vii)				
273.14 (f)	273B	Universal waste aerosol cans (i.e., each aerosol can), or a container in which the aerosol cans are contained, are labeled or marked with any of the following phrases: <input type="checkbox"/> "Universal Waste - Aerosol Can(s)" <input type="checkbox"/> "Waste Aerosol Can(s)" <input type="checkbox"/> "Used Aerosol Can(s)"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: Any hazardous waste generated as a result of puncturing and draining aerosol cans is subject to all applicable requirements of Part 111 and 40 CFR, 260 through 272. The handler is considered the generator of the hazardous waste.

NOTE: If the contents of a punctured can are determined to be non-hazardous, the handler may manage the waste in any way that is in compliance with applicable federal, state, or local solid waste regulations. (40 CFR 27313(e)(4)(vi))

## Section 7 - Management Of Universal Waste Consumer Electronics

(C - Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL WASTE CONSUMER ELECTRONICS Part 111 Rule 228	C	NC	NI	NA
Rule 228 (4)(d)(i)	273B	Consumer electronics are managed in a manner that prevents breakage or a release by containing the consumer electronics in packaging that will prevent breakage during normal handling conditions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rule 228 (4)(d)(ii)	273B	Outer packaging or a container labeled with any of the following phrases: <input type="checkbox"/> “Universal Waste—Consumer Electronics” <input type="checkbox"/> “Universal Waste—Electronics”	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rule 228 (4)(d)(iii)	273B	SQH properly contains, classifies, and disposes of releases and potential releases of consumer electronics and residues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: A universal waste SQH handling consumer electronics may perform any of the following activities and shall still be regulated as a universal waste SQH:

- 1) Repair the consumer electronics for potential direct reuse. (Part 111, R 228(4)(e)(i))
- 2) Remove other universal wastes from the consumer electronics. (Part 111, R 228(4)(e)(ii))
- 3) Remove individual modular components for direct reuse. (Part 111, R 228(4)(e)(iii))

## Section 8 - Management Of Universal Waste Antifreeze

(C - Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	MANAGEMENT OF UNIVERSAL WASTE ANTIFREEZE Part 111 Rule 228	C	NC	NI	NA
Rule 228 (4)(f)(i)	273B	Antifreeze is managed in a manner that prevents releases to the environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rule 228 (4)(f)(ii) (A-D)	273B	Antifreeze is contained in one or more of the following ways: <input type="checkbox"/> A container that remains closed, is structurally sound, is compatible with the antifreeze, and that lacks evidence of leakage, spillage, or damage that could cause leakage (A) <input type="checkbox"/> A container that does not meet the above conditions is overpacked in a container that does meet the above requirements (B) <input type="checkbox"/> A tank that meets the requirements of 40 CFR, Part 265, Subpart J, except for 40 CFR 265.197 and 200 (C) <input type="checkbox"/> A transport vehicle or vessel that remains closed, is structurally sound, is compatible with the antifreeze, and that lacks evidence of leakage, spillage, or damage that could cause leakage (D)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rule 228 (4)(f)(iii)	273B	Any releases of antifreeze or a component of antifreeze were immediately cleaned up and properly characterized for disposal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rule 228 (4)(f)(iv)	273B	Containers or tanks are labeled with any of the following phrases: <input type="checkbox"/> "Universal Waste - Antifreeze" <input type="checkbox"/> "Waste Antifreeze" <input type="checkbox"/> "Used Antifreeze"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>