Collector Best Management Practices: Universal Waste and Used Oil

Universal waste is a special class of hazardous waste that is commonly generated by both households and businesses. Used oil is not considered a universal waste, but is treated in a similar manner. Collection sites can handle universal waste and used oil if they will be recycled or receive proper treatment and disposal. This handout describes some best practices for handling these materials. The regulations on the management of these items can be found in NR 673 (universal waste) and NR 679 (used oil). If you have any questions, please call your DNR hazardous waste specialist.

While not all of the practices listed below are requirements, all of the collected materials must be properly labeled and most must leave collection sites within a year of collection.

Lamps (including fluorescent, CFL, HID, sodium, mercury vapor, neon)

✔ Store lamps in sturdy cardboard boxes or other tall containers. Lamp boxes can often be provided by a lamp retailer or your recycler. To prevent breakage, do not store lamps loose, taped together or in an open container. Smaller CFLs may be stored in a five-gallon plastic bucket or another sturdy, non-metal container with a lid. Never use metal containers for fluorescent lamps because the metal can absorb mercury and become hazardous waste.

✔ Keep the containers closed when you’re not adding or removing lamps.

✔ Label containers as Waste Lamps, Used Lamps, or Universal Waste Lamps.

✔ Write the date of first use (when the first waste lamp is placed in the container) on the outside of the container.

✔ Recycle lamps within one year of collection.

Broken lamps that contain mercury, including tube-style fluorescent bulbs and CFLs, must be cleaned up immediately. If the break occurs indoors, open a window or door and have everyone leave the room. Turn off central heating and cooling and wait 10 minutes before returning to the room. To clean, push broken glass onto stiff paper or cardboard using damp, disposable paper towels or wet wipes. Use sticky tape to remove small pieces and powder. Never vacuum or sweep broken bulbs. Place broken lamps and cleanup debris in a leak-proof, non-metal container and send it for recycling with your next shipment of intact lamps.
**Batteries** (including rechargeable, lithium, NiCad, mercury, lead-acid)

- Store batteries in leak-proof plastic containers, like a five-gallon bucket. Use separate containers for each type of battery unless instructed otherwise by your recycler. Do not use metal containers to store batteries, as that can lead to a fire.
- Keep the containers closed when you’re not adding or removing batteries.
- Prevent short-circuiting and potential fires by using one of the following methods for battery storage: place tape over battery terminals, package batteries so terminals cannot come into contact, discharge batteries according to manufacturer’s instructions, or place each battery in a separate plastic bag.
- Intact, non-leaking, lead-acid (car) batteries should be placed on a pallet up to three layers high with cardboard in between the layers so the terminals do not touch. Shrink wrap the pallet.
- Place visibly leaking batteries (of any type) in their own, separate container and keep the container closed when not adding or removing batteries.
- Label each container Used Batteries, Waste Batteries or Universal Waste Batteries. For lead-acid batteries, put a label on or above the pallet.
- Write the date of first use on the outside of the container, on the label on or above the pallet.
- Recycle or dispose of all batteries within one year of collection.
- Non-rechargeable alkaline batteries, probably the most common kind found in households, are not a universal waste. If you or someone nearby doesn’t take them, they can go in the trash.

**Mercury-containing equipment** (including thermometers, thermostats, barometers, switches)

- Store in a plastic, leak-proof container such as a five-gallon bucket with a lid. Never use a metal container for mercury-containing devices, as metal can absorb the mercury.
- Keep the containers closed when you are not adding or removing devices.
- Label the container Waste Mercury-Containing Equipment or Used Mercury-Containing Equipment.
- Write the date of first use on the outside of the container.
- Send the devices away for recycling within one year.
If a device breaks, follow the mercury clean-up procedures described in the lamp section above. Mercury spills of less than two tablespoons may be cleaned up by site staff. If the spill is larger than two tablespoons, call the DNR Spill Response Hotline: 800-943-0003. For more information on cleaning up small mercury spills, visit: http://www.dhs.wisconsin.gov/eh/mercury/mercspill.htm.

**Antifreeze**

- Store in leak-proof, closeable containers, such as a 55-gallon closed-top plastic drum.
- Keep the container closed when not adding antifreeze to it.
- Label as Used Antifreeze.
- Write the date of first use on the outside of the container.
- Antifreeze should be sent for recycling within one year unless more time is needed to accumulate enough for proper recycling.

If used antifreeze spills, use absorbent materials to clean the spill up immediately. Store the antifreeze-soaked materials in a leak-proof, labeled container and contact your recycling vendor for further instruction. Following any spill, you should make a proper waste determination to find out if the spilled antifreeze is/is not hazardous waste.

**Used oil**

- Store used oil in structurally sound and closed containers, such as 55-gallon closed-top drums.
- Label as “Used Oil” – DO NOT LABEL AS “WASTE OIL.” Used oil and waste oil are not the same substances in hazardous waste regulations.
- Keep the container closed when you’re not adding used oil to it.
- Allow only site attendants to add used oil to the container to make sure there is no mixing of other fluids. If non-oil liquids are added, the entire container may no longer be recyclable.
- Use a transporter that has an EPA identification number to ship used oil off-site.
- You may burn used oil that you generate in your own used oil burner. DO NOT send the oil to a third party to be burned in their oil burner.

If oil spills, use absorbent materials to clean the spill up immediately. Store the oil-soaked materials in a leak-proof, labeled container and send it away with the used oil.
More information

Go to dnr.wi.gov and search "universal waste" to find more information, including guidance documents, links to waste haulers licensed for these waste types and a short video demonstrating these best management practices. You may also call the DNR Waste and Materials Management program at (608) 266-2111 to be referred to a hazardous waste specialist.