



# UNIVERSAL WASTE MANAGEMENT

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F.W. Webb Company

## Branch 113

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*Failure to comply with the Universal Waste Regulations exposes the F.W. Webb Company to significant financial and environmental liability.*

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# Universal Waste Management Plan

## Introduction

The purpose of this document is to provide a clear definition of universal waste from a regulatory standpoint as well as clearly identify the handling requirements of these items to ensure compliance with relevant federal and state regulations.

Universal wastes are a special classification of hazardous waste. These wastes tend to meet the following criteria:

- Widespread among industry and households
- Commonly found in medium to large volumes
- Exhibit low-level hazards to human health and the environment
- Contain hazardous materials that may be recycled

Electronic wastes often contain similar contaminants of concern and can be managed by the same vendors. Some of F.W. Webb's solid waste streams meet the regulatory definition of universal waste. If these universal waste items are not managed under the universal waste regulations, they shall be accumulated, collected, transported, stored, treated and disposed of in compliance with your State's regulatory requirements. Since F.W. Webb's footprint is over many states, this Universal Waste Management Plan contains the basics to ensure compliance at a general level. Some state requirements are more stringent than others. If you have any questions, you should check with Branch 113 to make sure your facility is in compliance.

These waste streams include used mercury-containing light bulbs, such as fluorescent and Ultraviolet (UV) light bulbs; all used rechargeable batteries including sealed lead-acid batteries, and mercury-containing equipment such as thermostats.

Federal and state regulations outline requirements for identifying, handling, storing, labeling, and recycling universal waste.

## Plan Scope

This Universal Waste Management Plan (Plan) identifies the different universal waste streams and their associated handling and storage requirements, as well as regulatory requirements for training, monitoring and records retention as stated in the State and Federal regulations.

## Training

Universal Waste awareness training is required prior to handling items identified in this Plan. Branch 113 is available to provide Branch or Store training and to convey State-specific Universal Waste Disposal Regulations.

## Requirement Goal

Universal waste streams shall be managed at F.W. Webb to encourage recycling, minimize disposal costs, eliminate potential environmental impacts, and meet regulatory requirements.

## Waste Types

Universal and electronic wastes accumulated at F.W. Webb facilities comprise four general types:

1. Batteries - rechargeable batteries collected from miscellaneous electronic equipment, such as mobile telephones, portable computers, and emergency backup lighting. Specific types include nickel-cadmium, lithium ion and lead-acid batteries. Automotive type batteries are also regulated.
2. Light bulbs - tube and compact fluorescents, mercury vapor, high-intensity discharge (HID), UV and neon lamps.
3. Mercury-containing devices -thermometers, thermocouples, manometers, barometers, sphygmomanometers, and electrical switches and relays.

4. Cathode Ray Tubes (CRTs) in monitors, televisions, and certain equipment.

Note: Not all used batteries and light bulbs contain hazardous materials: Non-rechargeable alkaline batteries and standard incandescent lamps may be managed as non-hazardous waste.

## Universal Waste Handling and Storage

Universal Waste materials shall be accumulated and stored in areas that are clearly labeled with the words “Universal Waste” and follow the following criteria:

- A. Labeling - Containers that accumulate or store universal waste must be labeled with an appropriate Universal Waste label indicating "Universal Waste", type of material and the accumulation start date. The accumulation start date is the date at which the first item is placed in the container for storage. For example - “Universal Waste Batteries” and the date that the first battery was put in the container. *See Page 8 for a label example.*
- B. Storage - Universal waste may be accumulated on-site for up to one year. Universal waste storage containers should be situated so that labels are clearly visible. Universal waste must be stored in a manner to prevent breakage and damage. *See Page 9 for a storage container example.*
- C. Container Condition - Containers must be in good condition, to prevent leaks, spills, damage or breakage of waste materials. There may not be severe dents or other conditions that could cause leaks.
- D. Waste Condition - Waste items shall remain intact and in their original state in order to be considered Universal Wastes. Otherwise they are considered Hazardous Wastes and should be managed accordingly.
- E. Compatibility/Containment - Containers should be compatible with the universal waste stored in them.
  - Batteries should be stored in containers, such as cardboard boxes or polyethylene open top containers, after being placed in plastic bags or taped to prevent contacts from short circuiting and fire.
  - Used lamps should be stored in original purchase boxes or containers that are empty of all new lamps, or in containers provided by the recycling vendor.

- F. General Housekeeping - In general, accumulation areas should be kept clean and orderly, with easy access for container movement and inspections. Care must be exercised to clean up broken fluorescent lamps. *See note on Page 7.*

## Automotive Batteries

Lead acid automotive batteries are recycled under relaxed regulations that allow them to be returned to a vendor for reclamation. As proof of these transactions, if a Branch or Store handles automotive batteries, Branch 113 strongly recommends that records of all transactions be maintained. With the exception of labeling, all universal waste management requirements described in this document must be followed.

## Roles & Responsibilities

All General Managers (GMs), Operation Managers (OMs), and Store Managers, or their appointed designee, shall be responsible for regulatory oversight for universal waste operations to ensure proper universal waste management, including:

- Training and/or providing training materials to all staff and employees who accumulate universal waste;
- Guidance on universal waste identification and determination;
- Guidance on proper clean up procedures for broken universal waste materials. *See note on Page 7.*
- Annual review of shipment paperwork and certificates of destruction to ensure proper waste management;
- Disposal facility audit review;
- Maintain copies of shipment paperwork (Non-Hazardous Waste Manifests, Bills of Lading & Certificates of Destruction / Recycling);
- Responsible for the proper management of mercury-containing devices other than light bulbs as Universal Wastes at F.W. Webb. Duties include pick-ups from customers, proper accumulation, shipment, and disposal of these devices.



## Monitoring Requirements

Universal waste accumulation areas are to be monitored and inspected on a routine basis (recommended weekly) to verify all handling and storage requirements outlined in this procedure. ***Please see the inspection form example attached to this Plan.*** Universal waste storage areas should also be monitored to evaluate compliance with regulatory requirements, to evaluate the quantities of waste accumulated on-site, and to identify pollution prevention opportunities.

## Record Management

All F.W. Webb Branches and Stores must retain all shipment paperwork; either the bill of lading or non-hazardous waste manifest and their corresponding certificates of destruction, for a minimum of three (3) years.

HR shall maintain training records for F.W. Webb employees participating in universal waste management training sessions indefinitely.

Branch 113 is available for Universal Waste Training as needed.

## United States Environmental Protection Agency

The USEPA has an excellent website for Universal Waste Management:

<https://www.epa.gov/hw/universal-waste>

# Broken Bulb Clean Up Guideline

If you have broken fluorescent bulbs, call Branch 113 immediately before attempting to clean up the material. The proper personal protective equipment (PPE) must be donned before implementing a cleanup task.

GM: Felix Perriello - Cell 857-998-3711

# Universal Waste Label Example



The image shows a sample of a Universal Waste Label. It has a white background with a thick black border. At the top, the word "UNIVERSAL" is written in large, bold, black letters, slanted upwards from left to right. To its right, the word "WASTE" is written in large, bold, black letters. Below this, there is a white rectangular area with a black border. Inside this area, the text "GENERATOR INFORMATION (Optional)" is centered. Below this text, there are five lines of text, each followed by a horizontal line for writing: "SHIPPER", "ADDRESS", "CITY, STATE, ZIP", "CONTENTS", and "ACCUMULATION START DATE". At the bottom of the label, the words "UNIVERSAL WASTE" are written in large, bold, black letters.

**UNIVERSAL WASTE**

GENERATOR INFORMATION (Optional)

SHIPPER \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY, STATE, ZIP \_\_\_\_\_

CONTENTS \_\_\_\_\_

ACCUMULATION START DATE \_\_\_\_\_

**UNIVERSAL WASTE**

<https://www.mysafetylabels.com>



## Example of Fluorescent Lamp Recycling Drum - 4 Foot Lamps



[https://www.bestcontainers.com/ffl10.html?\\_vsrefdom=adwords&gclid=Cj0KCQiArqPgBRCRARIsAPwIHoXYphlMuWpMw5nJDNtnWGI8Uh6lJkUfkl8bBWzzrhWPwQ-a4B0E0gAaAuCiEALw\\_wcB](https://www.bestcontainers.com/ffl10.html?_vsrefdom=adwords&gclid=Cj0KCQiArqPgBRCRARIsAPwIHoXYphlMuWpMw5nJDNtnWGI8Uh6lJkUfkl8bBWzzrhWPwQ-a4B0E0gAaAuCiEALw_wcB)

## Universal Waste Inspection Form

### Weekly Inspections

Inspector Name:


**Inspection Date:**[illegible]

**Comments:**

[illegible]

## Contact Information