

Comparison of Key Universal Waste (UW) Handler and Hazardous Waste (HW) Generator Requirements					
Requirement	Universal Wastes		Hazardous Wastes*		
	Small Quantity Handler	Large Quantity Handler	Conditionally Exempt	Small Quantity Generator	Large Quantity Generator
Quantity Limit	Accumulates at any time < 5,000 kg	Accumulates at any time 5,000 kg or more	Generates per month:  • < 100 kg HW; or  • 1 kg or less acute HW	Generates per month between 100 and 1,000 kg HW	Generates per month: <ul><li>1,000 kg HW; or</li><li>1 kg acute HW</li></ul>
EPA ID number	Not Required	Required	Not Required	Required	Required
On site accumulation limit	5,000 kg	No Limit	<ul> <li>1,000 kg HW</li> <li>1 kg acute HW</li> <li>100 kg spill residue from acute HW</li> </ul>	6,000 kg	No Limit
Storage time limit	1 year, unless for proper recovery, treatment, or disposal	1 year, unless for proper recovery, treatment, or disposal	None	180 days (270 days if waste transported 200 miles or more)	90 days
Manifest	Not required	Not required, but must keep basic shipping records	Not required	Required	Required
Personnel training	Inform employees of proper handling and emergency procedures appropriate to the UW handled.	Employees must be thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities	Not required	Employees must be thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities	Full training with annual review; recordkeeping
Container Storage Area Inspection	Not Required	Not Required	Not Required	Weekly inspection	Weekly inspection

<sup>\*</sup>NOTE: Universal wastes are not included when determining the quantity of hazardous wastes generated per month.