

**Federal vs. State Universal Waste Programs (February 2013)**

State	Batteries	Lamps	Mercury-Containing Equipment	Pesticides	Additional /Different Universal Wastes	Key Additional Requirements (not comprehensive)
Alabama	X	X	X	X	Lamps that are broken, crushed, or not intact may not be handled as universal waste.	
Alaska	X	X	X	X		
Arizona	X	X	X	X		
Arkansas	X	X	X	X	Consumer electronic items, including cathode ray tubes (CRTs).  Broken lamps and debris from broken lamps may not be handled as universal waste.	Mercuric oxide batteries prohibited from disposal in municipal or medical waste.
California	X	X	X		Aerosol cans; cathode ray tubes (CRTs); CRT glass; electronic devices.  Mercury-containing equipment specifically listed in rules.  Certain mercury-containing wastes are "listed" and are hazardous regardless of mercury level.  Automotive lead-acid batteries may not be managed as universal waste.	No small quantity handler category – all UW handlers must meet same requirements; detailed training requirements and training records required; treatment must be authorized; no provision to allow storage for more than one year; additional requirements for management of mercury-containing equipment; no household/CESQG exemption.

NOTE: An "X" in the column under batteries, lamps, mercury-containing equipment, or pesticides means that the state includes those wastes as universal wastes in the state program.

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<b>Federal vs. State Universal Waste Programs (February 2013)</b>						
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Colorado	X	X	X	X	Aerosol cans; electronic devices and electronic components	Lamps may be crushed if certain requirements are met
Connecticut	X	X	X	X	Used electronics.  All mercury-containing lamps, including those that are not hazardous wastes, must be managed as universal waste.	
Delaware	X	X	X	X		
Florida	X	X	X	X	Pharmaceutical waste	Lamps may be crushed if certain requirements are met.  Additional requirements for transporters and handlers of mercury lamps and devices.
Georgia	X	X	X	X		
Hawaii	X	X			Mercury thermostats	
Idaho	X	X	X	X		
Illinois	X	X	X	X		Lamps may be crushed if certain requirements are met
Indiana	X	X	X	X		Intentional crushing of lamps prohibited
Iowa	X	X	X	X		Additional rules for CRTs and mercury switches from end of life vehicles.
Kansas	X	X	X	X		

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Kentucky	X	X	X	X		Does not allow breaking, disassembling, or crushing of universal waste lamps.
Louisiana	X	X	X	X	Antifreeze ; electronics	
Maine	X	X		X	Mercury devices, cathode ray tubes; mercury thermostats; motor vehicle mercury switches; totally enclosed, non leaking polychlorinated biphenyl (PCB) ballast	Accumulation area inspections; training documentation; Recyclable Hazardous Materials Uniform Bill of Lading or manifest required; certificate of recycled required; no intentional breaking/crushing of lamps; additional accumulation/storage requirements.
Maryland	X	X	X	X	PCB-containing lamp ballast	Lamps may be crushed if certain requirements are met
Massachusetts	X	X		X	Mercury-containing devices and thermostats	Closure requirements for handlers; may crush or dismantle lamps if certain requirements met; containers used to hold thermostats, mercury-containing devices, and lamps must be vapor-tight.
Michigan	X	X		X	Antifreeze; consumer electronics; electric lamps; devices containing elemental mercury; thermostats, mercury switches, mercury thermometers; pharmaceuticals.	Electric lamps must not be crushed or broken.
Minnesota	X	X	X	X		Handlers who accumulate more than 1,000 lamps must establish financial assurance.
Mississippi	X	X	X	X		

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Missouri	X	X	X	X		Additional requirements for handlers of mercury-containing equipment or lamps
Montana	X	X	X	X		Lamps may be crushed if certain requirements are met
Nebraska	X	X	X	X	Electronic items	Written approval required to exceed one year accumulation limit; additional requirements for draining elemental mercury from open ended items.
Nevada	X	X	X	X		
New Hampshire	X	X	X	X	Cathode ray tubes; waste antifreeze	Very large quantity handler category; outdoor storage must be covered; must provide proof for storage longer than one year; no provisions for handling devices with uncontained mercury or removal of mercury from open housings; may not crush or dismantle universal waste lamps unless a permit is obtained.
New Jersey	X	X	X	X	Consumer electronics; oil-based finishes	
New Mexico	X	X	X	X	Aerosol cans	Lamps may be crushed if certain requirements are met; alternate labeling requirements
New York	X	X		X	thermostats	
North Carolina	X	X	X	X		
North Dakota	X	X	X	X		No provisions for handling equipment with uncontained mercury.

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Ohio	X	X	X	X		
Oklahoma	X	X	X	X		
Oregon	X	X	X	X		
Pennsylvania	X	X	X	X	Oil-based finishes; photographic solutions	
Rhode Island	X	X	X	X	Used electronics; silver- containing photo fixing solutions.	Lamps, certain batteries, and mercury equipment must be managed as universal waste (or hazardous waste) whether or not they exhibit a hazardous characteristic; handlers prohibited from intentionally breaking or crushing universal wastes and may not manage as universal wastes a significant number of broken items of any given type on any day.
South Carolina	X	X	X	X		
South Dakota	X	X	X	X		
Tennessee	X	X	X	X		Small quantity handlers must track shipments; satellite accumulation area requirements; lamps may be crushed if certain requirements are met
Texas	X	X	X	X	Paint and paint-related waste	Lamps may be crushed if certain requirements are met

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Utah	X	X	X	X		Generators of mercury-containing lamps must contract with Utah-certified laboratory to determine if hazardous waste under TCLP.
Vermont	X	X	X	X	PCB-containing fluorescent light ballasts; cathode ray tubes	No provisions for handling devices with uncontained mercury or removal of mercury from open housings; not intentional crushing or breaking of lamps; packaging requirements.
Virginia	X	X	X	X	Vehicle switches	Allows crushing of lamps.
Washington	X	X	X			Different limits and notification requirements for large quantity handlers; labeling and record keeping requirements for thermostats are different; lamp storage requirements.
West Virginia	X	X	X	X		
Wisconsin	X	X		X	Thermostats	Using enforcement discretion to regulate waste antifreeze and mercury-containing as a universal waste.
Wyoming	X	X		X	Thermostats	

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<b>Comparison of Key Universal Waste (UW) Handler and Hazardous Waste (HW) Generator Requirements</b>					
<b>Requirement</b>	<b>Universal Wastes</b>		<b>Hazardous Wastes*</b>		
	<b>Small Quantity Handler</b>	<b>Large Quantity Handler</b>	<b>Conditionally Exempt</b>	<b>Small Quantity Generator</b>	<b>Large Quantity Generator</b>
<b>Quantity Limit</b>	Accumulates at any time < 5,000 kg	Accumulates at any time 5,000 kg or more	Generates per month: <ul style="list-style-type: none"> <li>&lt; 100 kg HW;</li> <li>or</li> <li>1 kg or less acute HW</li> </ul>	Generates per month between 100 and 1,000 kg HW	Generates per month: <ul style="list-style-type: none"> <li>1,000 kg HW; or</li> <li>1 kg acute HW</li> </ul>
<b>EPA ID number</b>	Not Required	Required	Not Required	Required	Required
<b>On site accumulation limit</b>	5,000 kg	No Limit	<ul style="list-style-type: none"> <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
<b>Storage time limit</b>	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
<b>Manifest</b>	Not required	Not required, but must keep basic shipping records	Not required	Required	Required
<b>Personnel training</b>	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

<b>Container Storage Area Inspection</b>	Not Required	Not Required	Not Required	Weekly inspection	Weekly inspection
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\*NOTE: Universal wastes are not included when determining the quantity of hazardous wastes generated per month.