Executive Summary
Don’t let the name fool you—while universal wastes like aerosol cans, batteries, electronics, lamps, and more may be common across many industries, management standards for these wastes vary from state to state. In California, universal waste handlers must comply with unique State requirements beyond what the Federal RCRA program mandates. Knowing how to identify and manage universal waste is a critical part of hazardous waste compliance under Cal/EPA rules.
What’s Universal Waste?

California’s universal waste standards apply to the following:

- Electronic devices
- Batteries, silver button batteries, mercury batteries, alkaline batteries, and other batteries that exhibit a hazardous waste characteristic
- Electric lamps, fluorescent tubes and bulbs, high-intensity discharge lamps, sodium vapor lamps, electric lamps that contain added mercury, and other lamps that exhibit a hazardous waste characteristic
- Mercury-containing equipment like thermostats, pressure gauges, dilators, weighted tubing, mercury gas flow regulators, counterweights, dampers, and more
- Cathode ray tubes (CRTs) and CRT Glass
- Non-empty aerosol cans

Relaxed Requirements for Universal Waste

Requirements for accumulating universal wastes are generally less stringent than 90-day, 180-day, or even satellite rules.

For example:

- No inspection requirements
- No limits on the amounts that may be accumulated
- No manifest needed when shipping off site
- One-year time limit to accumulate
Rules for Universal Waste Handlers

Universal waste personnel in California must follow state-specific management standards when generating and storing universal waste on site. Per Title 22 of the California Code of Regulations (CCR), Sections 66273.30–66273.39, these unique requirements include:

- Do not dispose of, treat, or dilute universal waste except as provided for in the regulations.
- Notify DTSC and/or obtain an EPA identification number if 5,000 kg or more of universal waste is present on site at any one time.
- Annually train personnel who consolidate, sort, treat, recycle, package, offer for transport, or physically relocate containers of universal waste per 22 CCR 66273.36(b).
- Accumulate universal waste for no longer than one year.
- Use proper containment—depending on the type of universal waste.
- Follow management standards specific to each type of universal waste.
- Mark and label containers appropriately per 22 CCR 66273.34.
- If applicable, comply with fire code and zoning requirements when storing universal wastes.
- Have spill kits readily available to deal with accidental spills.
- After universal waste is spilled, identifying whether the cleaned-up material is hazardous waste and if so, managing appropriately.
- Track all shipments of universal wastes sent or received.

The management standards for universal waste may be less stringent than for other hazardous wastes, but these rules are critical. Violations of State hazardous waste regulations can lead to fines from California’s Department of Toxic Substances Control (DTSC) as high as $70,000 per day, per violation.
Expert California Hazardous Waste Training

California regulates hazardous waste more stringently than any other US state. Both Federal RCRA and California State regulations require annual training for hazardous waste personnel.

Lion offers trusted training that guides you through what you must know to confidently navigate and apply the RCRA, California Title 22, and California Health and Safety Code standards that impact your facility.

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- San Jose Mar. 30–31
- Sacramento Apr. 02–03

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- Sacramento July 20–21
- San Jose July 23–24

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California Hazardous Waste Management
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