

FAQ for Universal Waste

The following FAQ information is provided to clarify some issues that have caused disagreement between generators and DRMOs.

Q: If I have declared my item a universal waste on the 1348-1a and I am in a universal waste state, why is the DRMO having me sign a hazardous waste manifest?

A: If the contractor takes the waste to a non-universal waste state or transports through a non-universal waste state, there must be a manifest.

Q: If there is a manifest, does the universal waste then count against my RCRA hazardous waste generations?

A: No, but the manifest must indicate that the item is a universal waste.

Q: Since a universal waste does not count against my RCRA generations, shouldn't it go under the generally less expensive non-RCRA hazardous item numbers (HINs) on DRMO contracts?

A: No, the treatment standard does not change for the universal waste, which is the bulk of the cost for the contractor. The savings in cost for the contractor by doing a bill of lading instead of a manifest is minimal. Universal waste should be ordered under the corresponding hazardous HINs (9100-9899).

Q: Where can I go to find out if my state is a universal waste state?

A: EPA maintains a map at their web site.