

CONSOLIDATED CHECKLIST C11

Consolidated Checklist for Universal Wastes
40 CFR Part 273 as of June 30, 2018

Note: The wording of several paragraphs addressed by this checklist needs to be revised to reflect the universal waste(s) the State adopts. Examples of such paragraphs include 273.32(a)(1), 273.32(b)(4) & (5), 273.6 definition of “Small Quantity Generator,” and 273.39(a)(2). For instance, 273.39(a)(2) lists batteries, pesticides and thermostats as examples. A State should include as examples only those universal wastes for which it adopts regulations.

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE

PART 273-STANDARDS FOR UNIVERSAL WASTE MANAGEMENT

SUBPART A-GENERAL

† SCOPE

Part 273 establishes requirements for managing the listed universal wastes	142 A	273.1(a) intro					
batteries as described in 273.2	142 B	273.1(a)(1)					
1 pesticides as described in 273.3	142 C, †181	273.1(a)(2)					
1 mercury-containing thermostats as described in 273.4	142 D, †181, †209	273.1(a)(3)					
1 lamps as described in 273.5	†181	273.1(a)(4)					
Part 273 provides an alternate set of management standards in lieu of regulation under Parts 260-272	142 A	273.1(b)					

† APPLICABILITY - BATTERIES

1 requirements of Part 273 apply to persons managing 273.9 batteries, except those in 273.2(b) list	142 B, †181	273.2(a)(1)					
spent lead-acid batteries not managed under Part 266, Subpart G are subject to management under Part 273	142 B	273.2(a)(2)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
requirements of Part 273 do not apply to persons managing the following batteries:	142 B	273.2(b)					
spent lead-acid batteries managed under Part 266, Subpart G	142 B	273.2(b)(1)					
1 batteries, as described in 273.9, that are not yet waste under Part 261, including those that do not meet the criteria for waste generation in 273.2(c)	142 B, †181	273.2(b)(2)					
1 batteries, as described in 273.9, that are not hazardous waste; a hazardous waste only if it exhibits one or more of the characteristics of a hazardous waste identified in Part 261, subpart C	142 B, †181	273.2(b)(3)					
a used battery becomes a waste on the date it is discarded	142 B	273.2(c)(1)					
an unused battery becomes a waste on the date the handler decides to discard it	142 B	273.2(c)(2)					

† APPLICABILITY-PESTICIDES

1 Part 273 applies to persons managing 273.9 pesticides, except those in 273.3(b)	142 C, †181	273.3(a)					
recalled pesticides that are:	142 C	273.3(a)(1)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
stocks of suspended and cancelled pesticides as per FIFRA §19(b), including, but not limited to those owned by the registrant responsible for conducting the recall	142 C	273.3(a)(1)(i)					
stocks of suspended or cancelled pesticides, or pesticides not in compliance with FIFRA, that are part of a voluntary recall by the registrant	142 C	273.3(a)(1)(ii)					
stocks of other unused pesticide products collected and managed as part of a waste pesticide collection program	142 C	273.3(a)(2)					
requirements of Part 273 do not apply to persons managing the following pesticides:	142 C	273.3(b)					
recalled 273.3(a)(1)&(2) pesticides managed by farmers in compliance with 262.70	142 C	273.3(b)(1)					
pesticides not meeting the 273.3(a) conditions; these pesticides must be managed in compliance with Parts 260 through 272	142 C	273.3(b)(2)					
pesticides that are not wastes under Part 261, including those that do not meet the 273.3(c) criteria for waste generation or those that are not 273.3(d) wastes	142 C	273.3(b)(3)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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pesticides that are not hazardous waste (i.e., is not listed nor exhibits a characteristic)	142 C	273.3(b)(4)					
a recalled 273.3(a)(1) pesticide becomes a waste on the first date on which both of the following conditions apply:	142 C	273.3(c)(1)					
the generator of the recalled pesticide agrees to participate in the recall	142 C	273.3(c)(1)(i)					
the person conducting the recall decides to discard (e.g., burn the pesticide for energy recovery)	142 C	273.3(c)(1)(ii)					
an unused pesticide product described in 273.3(a)(2) becomes a waste on the date the generator decides to discard it	142 C	273.3(c)(2)					
pesticides that are not wastes:	142 C	273.3(d)					
recalled 273.3(a)(1) pesticides, provided that the person conducting the recall:	142 C	273.3(d)(1)					
has not made a decision to discard the pesticide; until decision is met, it does not meet the definition of "solid waste"; pesticide remains subject to FIFRA	142 C	273.3(d)(1)(i)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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has made the decision to use a management option under 261.2 that does not cause the pesticide to be a solid waste and, therefore, not a hazardous waste; this pesticide, including a recalled pesticide exported to a foreign destination for reuse, remains subject to FIFRA	142 C	273.3(d)(1)(ii)					
unused pesticide products described in 273.3(a)(2), if the generator has not decided to discard them. These pesticides remain subject to FIFRA	142 C	273.3(d)(2)					

† APPLICABILITY-MERCURY THERMOSTATS

1 Part 273 applies to persons managing 273.9 mercury-containing thermostats, except those in 273.4(b)	142 D, †181, †209	273.4(a)					
requirements of Part 273 do not apply to persons managing the following mercury-containing equipment :	142 D, †209	273.4(b)					
mercury-containing equipment not yet a waste under Part 261; 273.4(c) describes when mercury-containing equipment becomes a waste	142 D, †209	273.4(b)(1)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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mercury-containing equipment is a hazardous waste if it exhibits one or more of the characteristics or is listed in part 261, subpart D of this chapter; and	142 D, †209	273.4(b)(2)					
equipment and devices from which the mercury-containing components have been removed	†209	273.4(b)(3)					
used mercury-containing equipment becomes a waste on the date it is discarded	142 D, †209	273.4(c)(1)					
unused mercury-containing equipment becomes a waste on the date handler decides to discard it	142 D, †209	273.4(c)(2)					

† APPLICABILITY-LAMPS

1, 2	lamps covered under part 273	181	273.5(a)				
1	lamps not covered under part 273	181	273.5(b) intro				
			273.5(b)(1)				
			273.5(b)(2)				
1	generation of waste lamps	181	273.5(c) intro				
			273.5(c)(1)				
			273.5(c)(2)				
1, 2	reserved	181	273.6 - 273.7				

† APPLICABILITY-HOUSEHOLD AND VERY SMALL QUANTITY GENERATOR WASTE

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
1, 2 persons managing the wastes listed in 273.5(a)(1)&(2) may, at their option, manage them under Part 273	142 A, †181	273.8(a)					
1, 2 household wastes exempt under 261.4(b)(1) that are the same type as the 273.9 defined universal wastes	142 A, †181	273.8(a)(1)					
1, 2 very small quantity generator wastes exempt under 262.14 that are the same type as the 273.9 defined universal hazardous wastes	142 A, †181, 237	273.8(a)(2)					
1, 2 273.5(a)(1)&(2) wastes commingled with universal wastes are regulated under Part 273	142 A, †181	273.8(b)					

†, 1, 2 DEFINITIONS

“ampule”	†209	273.9					
“battery”	142 B, †181	273.9					
“destination facility”	142 A, †181	273.9					
“FIFRA”	142 C, †181	273.9					
“generator”	142 A, †181	273.9					
“lamp”	181	273.9					
“large quantity handler of universal waste”	142 A, †181, †209	273.9					
“mercury-containing equipment”	†209	273.9					
“on-site”	142 A, †181	273.9					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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"pesticide"	142 C, †181	273.9					
		273.9(a)					
		273.9(b)					
		273.9(c)					
3 "small quantity handler of universal waste"	142 A, †176, †181, †209	273.9					
"thermostat"	142 D, †181	273.9					
4, 5 "universal waste"	142 A, 142 B, 142 C, 142 D, †181, 214	273.9					
		273.9(1)					
	273.9(2)						
	142 A, 142 B, 142 C, 142 D, †181, †209	273.9(3)					
	†181	273.9(4)					
"universal waste handler"	142 A, †181	273.9					
		273.9(a)					
		273.9(a)(1)					
		273.9(a)(2)					
		273.9(b)					
		273.9(b)(1)					
		273.9(b)(2)					
"universal waste transfer facility"	142 A, †181	273.9					
"universal waste transporter"	142 A, †181	273.9					

SUBPART B-STANDARDS FOR SMALL QUANTITY HANDLERS OF UNIVERSAL WASTE

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
† APPLICABILITY							
1 Part 273, Subpart B applies to small quantity handlers of universal waste	142 A, †181	273.10					
† PROHIBITIONS							
a 273.6 small quantity handler of universal waste is:	142 A	273.11 intro					
prohibited from disposing of universal waste	142 A	273.11(a)					
prohibited from diluting or treating universal waste, except as provided	142 A	273.11(b)					
† NOTIFICATION							
a small quantity handler of a universal waste is not required to notify EPA	142 A	273.12					
† WASTE MANAGEMENT							
small quantity handlers of universal waste must manage waste batteries to prevent release	142 B	273.13(a)					
contain any universal waste battery that shows evidence of leakage, spillage, or damage; container must be closed, structurally sound, compatible, and lack evidence of leakage, spillage or damage that could cause a leak	142 B	273.13(a)(1)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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activities that may be conducted as long as the casing of each battery is not breached and remains intact and closed, except for electrolyte removal	142 B	273.13(a)(2)					
sorting batteries by type	142 B	273.13(a)(2)(i)					
mixing batteries by type	142 B	273.13(a)(2)(ii)					
discharging batteries so as to remove the electric charge	142 B	273.13(a)(2)(iii)					
regenerating used batteries	142 B	273.13(a)(2)(iv)					
disassembling batteries or battery packs into individual batteries or cells	142 B	273.13(a)(2)(v)					
removing batteries from consumer products	142 B	273.13(a)(2)(vi)					
removing electrolyte from batteries	142 B	273.13(a)(2)(vii)					
resulting electrolyte and other solid wastes must be tested to determine if they exhibit a hazardous waste characteristic	142 B	273.13(a)(3)					
if a characteristic is exhibited, the electrolyte and/or solid waste is subject to Parts 260 through 272; the handler is considered a hazardous waste generator	142 B	273.13(a)(3)(i)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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if not hazardous, then handler may manage the waste in any way that is in compliance with applicable Federal, State or local solid waste regulations	142 B	273.13(a)(3)(ii)					
small quantity handlers of universal waste must manage waste pesticides to prevent releases; universal waste pesticides must be contained in one or more of the following:	142 C, 214	273.13(b)					
a container that remains closed, structurally sound, compatible with the pesticide, and lacks evidence of leakage, spillage, or damage that could cause a leak	142 C	273.13(b)(1)					
a container that does not meet the requirements of 273.13(b)(1), provided that the unacceptable container is overpacked in a container that meets the 273.13(b)(1) requirements	142 C	273.13(b)(2)					
a tank meeting the Part 265, Subpart J requirements (except for 265.197(c), 265.200 and 265.201)	142 C	273.13(b)(3)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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a transport vehicle or vessel that is closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause a leak	142 C	273.13(b)(4)					
small quantity handler must manage universal waste mercury-containing equipment to prevent releases	142 D, †209	273.13(c)					
must place in a container any universal waste mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions; container must be closed, structurally sound, compatible, lack evidence of leakage, spillage or damage that could cause a leak, and must be reasonably designed to prevent the escape of mercury into environment	142 D, †209	273.13(c)(1)					
a small quantity handler of universal waste may remove mercury-constraining ampules from universal waste mercury-containing equipment provided the handler:	142 D, †209	273.13(c)(2)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
removes and manages the ampules in a manner designed to prevent breakage of the ampules	142 D, †209	273.13(c)(2)(i)					
6 removes ampules only over or in a containment device	142 D, †209	273.13(c)(2)(ii)					
7 ensures that a mercury clean-up system is readily available to immediately transfer any mercury resulting from spills or leaks from broken ampules, from that containment device to a container that meets 262.15 and 262.17 requirements	142 D, †209	273.13(c)(2)(iii)					
6, 7 immediately transfers any mercury resulting from spills or leaks from broken ampules from the containment device to a container that meets 262.15 and 262.17 requirements	142 D, †209	273.13(c)(2)(iv)					
6 ensures that the area where ampules are removed is well ventilated and monitored to ensure compliance with applicable OSHA mercury exposure levels	142 D, †209	273.13(c)(2)(v)					
6 ensures that employees are thoroughly familiar with mercury handling and emergency procedures including transfer of mercury from containment devices to appropriate containers	142 D, †209	273.13(c)(2)(vi)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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6, 8 stores removed ampules in closed, non-leaking containers that are in good condition; and	142 D, †209	273.13(c)(2)(vii)					
8 packs removed ampules in the container with packing materials adequate to prevent breakage	142 D, †209	273.13(c)(2)(viii)					
9 small quantity handler of universal waste mercury-containing equipment not containing ampule may remove open original housing holding the mercury from universal waste mercury-containing equipment provided handler:	†209	273.13(c)(3) intro.					
9 immediately seals original housing holding mercury with air-tight seal to prevent release of any mercury to environment; and	†209	273.13(c)(3)(i)					
9 follows all requirements for removing ampules and managing removed ampules under paragraph 273.13(c)(2); and	†209	273.13(c)(3)(ii)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
9 a small quantity handler of universal waste who removes mercury-containing ampules from mercury-containing equipment or seals mercury from mercury-containing equipment in its original housing must determine whether the following exhibit a hazardous waste characteristic	142 D, †209	273.13(c)(4)(i) intro.					
9 mercury or clean-up residues resulting from spills or leaks and/or	142 D, †209	273.13(c)(4)(i)(A)					
9 other solid waste generated as result of removing mercury-containing ampules or housing	142 D, †209	273.13(c)(4)(i)(B)					
9 if a characteristic is exhibited, the mercury, residues and/or solid waste is subject to Parts 260 through 272; the handler is considered a hazardous waste generator	142 D, †209	273.13(c)(4)(ii)					
9 if not hazardous, then handler may manage the mercury, residues and/or solid waste in any way that is in compliance with applicable Federal, State or local solid waste regulations	142 D, †209	273.13(c)(4)(iii)					
1 small quantity handlers must manage lamps to prevent releases	181	273.13(d)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
1 lamp must be in containers that are structurally sound, adequate to prevent breakage & compatible; containers must remain closed & lack evidence of leakage, spillage or damage that could cause leakage	181	273.13(d)(1)					
1 immediately clean up & place in a container any broken lamp or lamp with evidence of breakage, leakage, or damage that could cause a leak; containers must be closed, structurally sound, compatible, & lack evidence of leakage, spillage or damage that could cause a leak	181	273.13(d)(2)					
† LABELING/MARKING							
a small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified in 273.14(a) through (d)	142 A	273.14 intro					
each battery, or a container in which the batteries are contained, must be labeled or marked clearly with "Universal Waste--Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"	142 B, 214	273.14(a)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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for recalled 273.3(a)(1) pesticides, the container (or multiple container package unit), tank, transport vehicle or vessel must be labeled/marked with:	142 C	273.14(b)					
the label that was on or accompanied the product as sold or distributed	142 C	273.14(b)(1)					
the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"	142 C	273.14(b)(2)					
for unused 273.3(a)(2) pesticides, the container, tank or transport vehicle or vessel must be labeled/marked with:	142 C	273.14(c)					
the label that was on the product when purchased, if still legible	142 C	273.14(c)(1)(i)					
if 273.14(c)(1)(i) labeling not feasible, then the appropriate label as required under 49 CFR Part 172	142 C	273.14(c)(1)(ii)					
if 273.14(c)(1)(i) or (ii) labeling not feasible, then another label prescribed or designated by the waste pesticide collection program administered or recognized by a State	142 C	273.14(c)(1)(iii)					
the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"	142 C	273.14(c)(2)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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10 universal waste mercury-containing equipment or container in which equipment is contained, must be labeled or marked clearly with one of following phrases: “Universal Waste—Mercury Containing Equipment,” “Waste Mercury-Containing Equipment,” or “Used Mercury-Containing Equipment.”	†209	273.14(d)(1)					
10 universal waste mercury-containing thermostat or container containing only universal mercury-containing thermostats may be labeled or marked clearly with “Universal Waste—Mercury Thermostat(s),” or “Waste Mercury Thermostat(s),” or “Used Mercury Thermostat(s)”	142 D, †209	273.14(d)(2)					
1 each lamp or container in which lamps are contained must be clearly labeled or marked with “Universal Waste Lamp(s)” or “Waste Lamp(s)” or “Used Lamp(s)”	181	273.14(e)					
† ACCUMULATION TIME LIMITS							
one year accumulation period for small quantity handlers unless 273.15(b) requirements are met	142 A	273.15(a)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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an accumulation period longer than one year is allowed if activity is solely for the purpose of accumulating such quantities of universal wastes as necessary for proper recovery, treatment, or disposal; handler bears burden of proof	142 A	273.15(b)					
small quantity handlers must be able to demonstrate the length of time the universal waste has been accumulated; this demonstration is made by:	142 A	273.15(c)					
placing the universal waste in a container and marking or labeling with the earliest date that any universal waste in the container became a waste or was received	142 A	273.15(c)(1)					
marking or labeling each individual item of universal waste with date it became a waste or was received	142 A	273.15(c)(2)					
maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received	142 A	273.15(c)(3)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or group of containers of universal waste became a waste or was received	142 A	273.15(c)(4)					
placing universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received	142 A	273.15(c)(5)					
any method clearly demonstrating the length of time that the universal waste has been accumulated	142 A	273.15(c)(6)					
† EMPLOYEE TRAINING							
small quantity handler employees who handle or are responsible for managing universal wastes must be informed of the proper handling and emergency procedures for the universal waste(s) handled	142 A	273.16					
† RESPONSE TO RELEASES							
a small quantity handler must immediately contain all releases of universal waste and other residues from universal wastes	142 A	273.17(a)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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determine if material resulting from a release is hazardous waste and manage it in compliance with all applicable Part 260 through 272 requirements; the handler is considered the generator and must be managed in compliance with Part 262	142 A	273.17(b)					

† OFF-SITE SHIPMENTS

small quantity handlers are prohibited from sending or taking universal waste to a place other than another universal waste handler, a destination facility, or a foreign destination	142 A	273.18(a)					
when small quantity handler transports off-site, the handler becomes a universal waste transporter subject to the Part 273, Subpart D requirements while transporting the universal waste	142 A	273.18(b)					
if the universal waste being transported off-site meets 49 CFR Parts 171-180 definition of hazardous materials, small quantity handlers must follow DOT requirements for packaging, labeling, marking, placarding, and tracking	142 A	273.18(c)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
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prior to shipment from the originating handler, the receiving handler must agree to receive the shipment	142 A	273.18(d)					
if the receiving handler rejects the shipment, the originating handler must either:	142 A	273.18(e)					
receive the waste back when notified that the shipment has been rejected, or	142 A	273.18(e)(1)					
agree with the receiving handler on a destination facility to which the shipment will be sent	142 A	273.18(e)(2)					
a small quantity handler can reject a universal waste shipment or a portion of a shipment; if rejected, the handler must notify the originating handler and either:	142 A	273.18(f)					
send the shipment back to the originating handler, or	142 A	273.18(f)(1)					
if agreed to by both the originating and receiving handler, send the shipment to a destination facility	142 A	273.18(f)(2)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
if small quantity handler receives a shipment containing hazardous waste that is not a universal waste, the handler must immediately notify EPA of the illegal shipment and provide the name, address, and phone number of the originating shipper; EPA will provide instructions for managing the hazardous waste	142 A	273.18(g)					
if a small quantity handler receives a non-hazardous, non-universal waste shipment, the handler may manage the waste in any way that is in compliance with applicable Federal, State or local solid waste regulations	142 A	273.18(h)					
† TRACKING UNIVERSAL WASTE SHIPMENTS							
small quantity handlers are not required to keep records of universal waste shipments	142 A	273.19					
† EXPORTS							
a small quantity handler who sends universal waste to a foreign destination is subject to the requirements of 40 CFR part 262, subpart H	142 A, †152, 236	273.20					
[Removed]	142 A, 236	273.20(a) – (c)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
SUBPART C-STANDARDS FOR LARGE QUANTITY HANDLERS OF UNIVERSAL WASTE							
† APPLICABILITY							
1 Part 273, Subpart C applies to large quantity handlers of universal waste	142 A, †181	273.30					
† PROHIBITIONS							
a large quantity handler of universal waste is:	142 A	273.31 intro					
prohibited from disposing of universal waste; and	142 A	273.31(a)					
prohibited from diluting or treating universal waste, except by responding to releases as per 273.37 or by managing a specific waste as provided in 273.33	142 A	273.31(b)					
† NOTIFICATION							
except as provided in 273.32(a)(2)&(3), a large quantity handler must have sent written notification of universal waste management to the Regional Administrator and received an EPA identification number before meeting or exceeding the 5,000 kg storage limit	142 A, 142 C	273.32(a)(1)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
a large quantity handler who has already notified EPA of hazardous waste activities and has an EPA identification number, is not required to re-notify	142 A	273.32(a)(2)					
a large quantity handler of 273.3(a)(1) recalled pesticides who has sent EPA notification as per 40 CFR 165 is not required to notify under 273.32 for those recalled universal wastes	142 C	273.32(a)(3)					
what the notification must include:	142 A	273.32(b)					
the universal waste handler's name and mailing address	142 A	273.32(b)(1)					
the name and business telephone number of the person at the universal waste handler's site who should be contacted	142 A	273.32(b)(2)					
the address or physical location of the universal waste management activities	142 A	273.32(b)(3)					
1 a list of all the types of universal waste managed by the handler	142 A, †181, †209	273.32(b)(4)					
1 a statement that the handler is accumulating more than 5,000 kg of universal waste at one time	142 A, †181, †209	273.32(b)(5)					

† WASTE MANAGEMENT

CONSOLIDATED CHECKLIST C11
Consolidated Checklist for Universal Wastes
40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
large quantity handlers of universal waste must manage waste batteries to prevent release	142 B	273.33(a)					
contain any universal waste battery that shows evidence of leakage, spillage, or damage; container must be closed, structurally sound, compatible, and lack evidence of leakage, spillage or damage that could cause a leak	142 B	273.33(a)(1)					
activities that may be conducted as long as the casing of each battery is not breached and remains intact and closed, except for electrolyte removal:	142 B	273.33(a)(2)					
sorting batteries by type	142 B	273.33(a)(2)(i)					
mixing batteries by type	142 B	273.33(a)(2)(ii)					
discharging batteries so as to remove the electric charge	142 B	273.33(a)(2)(iii)					
regenerating used batteries	142 B	273.33(a)(2)(iv)					
disassembling batteries or battery packs into individual batteries or cells	142 B	273.33(a)(2)(v)					
removing batteries from consumer products	142 B	273.33(a)(2)(vi)					
removing electrolyte from batteries	142 B	273.33(a)(2)(vii)					

CONSOLIDATED CHECKLIST C11
Consolidated Checklist for Universal Wastes
40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
resulting electrolyte and other solid wastes must be tested to determine if they exhibit a hazardous waste characteristic	142 B	273.33(a)(3)					
if a characteristic is exhibited, the electrolyte and/or solid waste is subject to Parts 260 through 272; the handler is considered a hazardous waste generator	142 B	273.33(a)(3)(i)					
if not hazardous, then handler may manage the waste in any way that is in compliance with applicable Federal, State or local solid waste regulations	142 B	273.33(a)(3)(ii)					
large quantity handlers of universal waste must manage waste pesticides to prevent release; universal waste pesticide must be contained in one or more of the following:	142 C	273.33(b)					
a container that remains closed, structurally sound, compatible with the pesticide, and lacks evidence of leakage, spillage, or damage that could cause a leak	142 C	273.33(b)(1)					
a container that does not meet the requirements of 273.33(b)(1), provided that the unacceptable container is overpacked in a container that meets the 273.33(b)(1) requirements	142 C	273.33(b)(2)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
a tank meeting the Part 265, Subpart J requirements (except for 265.197(c), 265.200 and 265.201); or	142 C	273.33(b)(3)					
a transport vehicle or vessel that is closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause a leak	142 C	273.33(b)(4)					
large quantity handler must manage mercury-containing equipment to prevent releases	142 D, †209	273.33(c) intro.					
must place in a container any universal waste mercury-containing equipment with non-contained mercury or that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions; container must be closed, structurally sound, compatible with device, and lack evidence of leakage, spillage or damage that could cause a leak; and must be reasonably designed to prevent escape of mercury into the environment by volatilization or any other means.	142 D, †209	273.33(c)(1)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
a large quantity handler of universal waste may remove mercury-constraining ampules from universal waste mercury-containing equipment provided the handler:	142 D, †209	273.33(c)(2)					
removes and manages the ampules in a manner designed to prevent breakage of the ampules	142 D, †209	273.33(c)(2)(i)					
6 removes ampules only over or in a containment device	142 D	273.33(c)(2)(ii)					
11 ensures that a mercury clean-up system is readily available to immediately transfer any mercury resulting from spills or leaks of broken ampules, from that containment device to a container that meets 262.15 and 262.17 requirements	142 D, †209	273.33(c)(2)(iii)					
6, 11 immediately transfers any mercury resulting from spills or leaks from broken ampules from the containment device to a container that meets 262.15 and 262.17 requirements	142 D, †209	273.33(c)(2)(iv)					
6 ensures that the area where ampules are removed is well ventilated and monitored to ensure compliance with applicable OSHA mercury exposure levels	142 D, †209	273.33(c)(2)(v)					

CONSOLIDATED CHECKLIST C11
Consolidated Checklist for Universal Wastes
40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
6 ensures that employees are thoroughly familiar with mercury handling and emergency procedures including transfer of mercury from containment devices to appropriate containers	142 D, †209	273.33(c)(2)(vi)					
6, 12 stores removed ampules in closed, non-leaking containers that are in good condition; and	142 D, †209	273.33(c)(2)(vii)					
12 packs removed ampules in the container with packing materials adequate to prevent breakage	142 D, †209	273.33(c)(2)(viii)					
13 a large quantity handler of universal waste mercury-containing equipment that does not contain an ampule may remove open original housing holding mercury from universal waste mercury-containing equipment provided handler:	†209	273.33(c)(3) intro.					
immediately seals original housing holding the mercury with an air-tight seal to prevent release of any mercury to environment; and	†209	273.33(c)(3)(i)					
follows all requirements for removing ampules and managing removed ampules under 273.33(c)(2); and	†209	273.33(c)(3)(i)(ii)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
a large quantity handler who removes mercury-containing ampules from mercury-containing equipment or seals mercury-containing equipment in its original housing must determine whether the following exhibit a hazardous waste characteristic	142 D, †209	273.33(c)(4)(i)					
mercury or clean-up residues resulting from spills or leaks and/or	142 D, †209	273.33(c)(4)(i)(A)					
other solid waste generated as result of removing mercury-containing ampules or housings	142 D, †209	273.33(c)(4)(i)(B)					
6 if a characteristic is exhibited, the mercury, residues and/or solid waste is subject to Parts 260 through 272; the handler is considered a hazardous waste generator	142 D, †209	273.33(c)(4)(ii)					
6 if not hazardous, then handler may manage the mercury, residues and/or solid waste in any way that is in compliance with applicable Federal, State or local solid waste regulations	142 D, †209	273.33(c)(4)(iii)					
1, 14 Removed	181, †209	273.33(d)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
1, 14 universal waste mercury-containing equipment, or a container in which equipment is contained, must be labeled or marked clearly with any of following phrases: “Universal Waste—Mercury Containing Equipment,” “Waste Mercury-Containing Equipment,” or “Used Mercury-Containing Equipment.”	181, †209	273.33(d)(1)					
1, 14 universal waste mercury-containing thermostat or container containing only universal waste mercury-containing thermostats may be labeled or marked clearly with any of following phrases: “Universal Waste—Mercury Thermostat(s),” “Waste Mercury Thermostat(s),” or “Used Mercury Thermostat(s).”	181, †209	273.33(d)(2)					
† LABELING/MARKING							
a large quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified in 273.34(a) through (d)	142 A	273.34 intro					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
each battery, or a container or tank in which the batteries are contained, must be labeled or marked clearly with “Universal Waste--Battery(ies)” or “Waste Battery(ies)” or “Used Battery(ies)”	142 B, 214	273.34(a)					
for recalled 273.3(a)(1) pesticides, the container (or multiple container package unit), tank, transport vehicle or vessel must be labeled/marked with:	142 C	273.34(b)					
the label that was on or accompanied the product as sold or distributed	142 C	273.34(b)(1)					
the words “Universal Waste--Pesticide(s)” or “Waste--Pesticide(s)”	142 C	273.34(b)(2)					
for unused 273.3(a)(2) pesticides, the container, tank or transport vehicle or vessel must be labeled/marked with:	142 C	273.34(c)					
the label that was on the product when purchased, if still legible	142 C	273.34(c)(1)(i)					
if 273.34(c)(1)(i) labeling not feasible, then the appropriate label as required under 49 CFR Part 172	142 C	273.34(c)(1)(ii)					
if 273.34(c)(1)(i) or (ii) labeling not feasible, then another label prescribed or designed by the pesticide collection program	142 C	273.34(c)(1)(iii)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
the words “Universal Waste--Pesticide(s)” or “Waste--Pesticide(s)”	142 C	273.34(c)(2)					
universal waste mercury-containing equipment (i.e., each device), or a container in which the equipment is contained, must be labeled or marked clearly with one of the given phrases	209	273.34(d)(1)					
universal waste thermostats or container or tank in which the thermostats are contained must be labeled or marked clearly with “Universal Waste--Mercury Thermostat(s)” or “Waste Mercury Thermostat(s)” or “Used Mercury Thermostat(s)”	142 D, 209	273.34(d)(2)					
1 each lamp or container in which lamps are contained must be clearly labeled or marked with “Universal Waste Lamp(s)” or “Waste Lamp(s)” or “Used Lamp(s)”	181	273.34(e)					
† ACCUMULATION TIME LIMITS							
one year accumulation period for large quantity handlers, unless 273.35(b) requirements are met	142 A	273.35(a)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
an accumulation period longer than one year is allowed if activity is solely for the purpose of accumulating such quantities of universal wastes as necessary for proper recovery, treatment, or disposal; handler bears burden of proof	142 A	273.35(b)					
large quantity handlers must be able to demonstrate the length of time the universal waste has been accumulated; this demonstration is made by:	142 A	273.35(c)					
placing the universal waste in a container and marking or labeling with the earliest date that any universal waste in the container became a waste or was received	142 A	273.35(c)(1)					
marking or labeling the individual item of universal waste with the date it became a waste or was received	142 A	273.35(c)(2)					
maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received	142 A	273.35(c)(3)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
maintaining an inventory system on-site that identifies that earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received	142 A	273.35(c)(4)					
placing universal waste in a specific accumulation area and identifying the earliest date that any universal waste in area became a waste or was received	142 A	273.35(c)(5)					
any other method clearly demonstrating the length of time that the universal waste has been accumulated from the date becomes a waste or is received	142 A	273.35(c)(6)					
† EMPLOYEE TRAINING							
large quantity handlers must ensure that employees are thoroughly familiar with proper waste handling and emergency procedures	142 A	273.36					
† RESPONSE TO RELEASES							
a large quantity handler must immediately contain all releases of universal waste and other residues from universal wastes	142 A	273.37(a)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
determine whether material resulting from the release is hazardous waste; if so, manage it in compliance with all applicable Part 260 through 272 requirements; the handler is considered the generator and subject to the Part 262 requirements	142 A	273.37(b)					
† OFF-SITE SHIPMENTS							
large quantity handlers are prohibited from sending or taking universal waste to a place other than to another universal waste handler, a destination facility, or a foreign destination	142 A	273.38(a)					
when a large quantity handler transports off-site, the handler becomes a universal waste transporter subject to the Part 273, Subpart D requirements while transporting the waste	142 A	273.38(b)					
if the universal waste being transported off-site meets 49 CFR Parts 171-180 definition of hazardous materials, large quantity handlers must follow DOT requirements for packaging, labeling, marking, placarding, and tracking	142 A	273.38(c)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
prior to shipment from the originating handler, the receiving handler must agree to receipt of shipment	142 A	273.38(d)					
if the receiving handler rejects the shipment, the originating handler must either:	142 A	273.38(e)					
receive the waste back when notified that the shipment has been rejected, or	142 A	273.38(e)(1)					
agree with the receiving handler on a destination facility to which the shipment will be sent	142 A	273.38(e)(2)					
a large quantity handler can reject a universal waste shipment or a portion of a shipment; if rejected, the handler must notify the originating handler and either:	142 A	273.38(f)					
send the shipment back to the originating handler, or	142 A	273.38(f)(1)					
if agreed to by both the originating and receiving handler, send the shipment to a destination facility	142 A	273.38(f)(2)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
if large quantity handler receives a shipment containing hazardous waste that is not a universal waste, the handler must immediately notify EPA of the illegal shipment and provide the name, address, and phone number of the originating shipper; EPA will provide instructions for managing hazardous the waste	142 A	273.38(g)					
if a large quantity handler receives a non-hazardous, non-universal waste shipment, the handler may manage the waste in any way that is in compliance with applicable Federal, State or local solid waste regulations	142 A	273.38(h)					

† TRACKING UNIVERSAL WASTE SHIPMENTS

large quantity handlers must keep a record of each universal waste shipment received; what form the record can take; the record must include:	142 A, 236	273.39(a)					
name and address of originating handler or foreign shipper	142 A	273.39(a)(1)					
quantity of each type of universal waste received	142 A	273.39(a)(2)					
the date the shipment was received	142 A	273.39(a)(3)					

CONSOLIDATED CHECKLIST C11
Consolidated Checklist for Universal Wastes
40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
large quantity handlers must keep a record of each universal waste shipment sent from the handler to other facilities; what form the record can take; the record must include:	142 A, 236	273.39(b)					
name and address of the universal waste handler, destination facility, or foreign destination to whom the universal waste was sent	142 A	273.39(b)(1)					
quantity of each universal waste type sent	142 A	273.39(b)(2)					
the date the shipment left the facility	142 A	273.39(b)(3)					
large quantity handlers must retain the 273.39(a) records for at least 3 years from the date of receipt of a shipment	142 A	273.39(c)(1)					
large quantity handlers must retain the 273.39(b) records for at least 3 years from the date a shipment left the facility	142 A	273.39(c)(2)					

† EXPORTS

a large quantity handler who sends universal waste to a foreign destination is subject to the requirements of 40 CFR part 262, subpart H	142 A, †152, 236	273.40					
[Removed]	142 A, 236	273.40(a) – (c)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE

SUBPART D-STANDARDS FOR UNIVERSAL WASTE TRANSPORTERS

† **APPLICABILITY**

1	Part 273, Subpart D applies to universal waste transporters	142 A, †181	273.50					
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† **PROHIBITIONS**

a universal waste transporter is:	142 A	273.51 intro					
prohibited from disposing of universal waste	142 A	273.51(a)					
prohibited from diluting or treating universal waste, except by responding to releases as 273.54 provides	142 A	273.51(b)					

† **WASTE MANAGEMENT**

universal waste transporters must comply with applicable 49 CFR Parts 171-180 DOT requirements for transport of any universal waste that meets the definition of hazardous material at 49 CFR 171.8; under the DOT regulations, a material is a hazardous waste if it is subject to the Part 262 hazardous waste manifest requirements; because universal waste does not require a hazardous waste manifest, it is not considered a hazardous waste under the DOT regulations	142 A	273.52(a)					
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CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
those universal wastes meeting the criteria for one or more hazard classes specified at 49 CFR 173.2 are regulated by DOT as hazardous materials; because universal waste shipments do not require a Part 262 manifest, they may not be described by the DOT proper shipping name “hazardous waste,(l) or (s), n.o.s.”, nor may the hazardous material’s proper shipping name be modified by adding the word “waste”	142 A	273.52(b)					

† STORAGE TIME LIMITS

universal waste transporters may store universal wastes at a universal waste transfer facility for 10 days or less	142 A	273.53(a)					
if waste is stored longer than 10 days, the transporter becomes a universal waste handler and must comply with Part 273, Subparts B or C, as applicable	142 A	273.53(b)					

† RESPONSE TO RELEASES

a universal waste transporter must immediately contain all releases of universal wastes and other residues from universal wastes	142 A	273.54(a)					
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CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
a universal waste transporter must determine whether material resulting from release is hazardous and subject to Parts 260-272; if the waste is hazardous, the transporter is subject to Part 262	142 A	273.54(b)					

† OFF-SITE SHIPMENTS

universal waste transporters are prohibited from transporting universal waste to a place other than a universal waste handler, a destination facility or a foreign destination	142 A	273.55(a)					
if universal waste meets DOT's definition of hazardous materials under 49 CFR 171.8, the shipment must be properly described on a shipping paper in accordance with 49 CFR Part 172	142 A	273.55(b)					

† EXPORTS

Error ! Book mark not defined. a universal waste transporter transporting universal waste to a foreign destination is not subject to the requirements of 40 CFR part 262, subpart H	142 A, †152, 236	273.56					
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CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
[Removed]	142 A, 236	273.56(a) and (b)					

**Error !
 Bookmark not defined.**

SUBPART E-STANDARDS FOR DESTINATION FACILITIES

† **APPLICABILITY**

owner/operator of a destination facility is subject to all applicable requirements of Parts 264, 265, 266, 268, 270, and 124 and the RCRA §3010 notification requirements	142 A, †181	273.60(a)					
owner/operator of a destination facility who recycles without storing that universal waste must comply with 261.6(c)(2)	142 A	273.60(b)					

† **OFF-SITE SHIPMENTS**

owner/operator of a destination facility is prohibited from sending or taking universal waste to a place other than a universal waste handler, another destination facility or a foreign destination	142 A	273.61(a)					
owner/operator of a destination facility may reject a universal waste shipment or a portion of a shipment; if rejected, the owner/operator must notify the shipper and either:	142 A	273.61(b)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
send shipment back to the original shipper, or	142 A	273.61(b)(1)					
if agreed by both the shipper and the owner/operator, the shipment is sent to another destination facility	142 A	273.61(b)(2)					
if the owner/operator of a destination facility receives a shipment containing hazardous waste that is not a universal waste, owner/operator must immediately notify EPA of the illegal shipment and provide the name, address, and phone number of the originating shipper; EPA will provide instructions for managing the hazardous waste	142 A	273.61(c)					
if non-hazardous, non-universal waste is received, the owner/operator may manage the waste in any that is in compliance with applicable Federal or State solid waste regulations	142 A	273.61(d)					

† TRACKING UNIVERSAL WASTE SHIPMENTS

owner/operator of a destination facility must keep a record of each shipment of universal waste received; what form the record may take; the record must include:	142 A, 236	273.62(a)					
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CONSOLIDATED CHECKLIST C11
Consolidated Checklist for Universal Wastes
40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
name and address of the universal waste handler, destination facility, or foreign shipper from whom the universal waste was sent	142 A	273.62(a)(1)					
quantity of each universal waste type received	142 A	273.62(a)(2)					
the date the shipment was received	142 A	273.62(a)(3)					
273.62(a) records must be retained for at least three years from the date of receipt of shipment of universal waste	142 A	273.62(b)					

SUBPART F-IMPORT REQUIREMENTS

† IMPORTS

persons managing imported universal waste are subject to part 262, subpart H and applicable requirements of subpart F immediately after the waste enters the U.S.	142 A, †152, 236	273.70 intro.					
universal waste transporters are subject to the universal waste transporter requirements of part 273, subpart D	142 A, 236	273.70(a)					
universal waste handlers are subject to the small or large quantity waste handler of universal waste requirements of part 273, subparts B or C, as applicable	142 A, 236	273.70(b)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
owners/operators of destination facilities are subject to the destination facility requirements of part 273, subpart E requirements	142 A, 236	273.70(c)					
† persons managing universal waste imported from OECD countries in 262.58(a)(1) are subject to 273.70(a) through (c) in addition to part 262, subpart H	152	273.70(d)					

SUBPART G-PETITIONS TO INCLUDE OTHER WASTES UNDER 40 CFR PART 273

† GENERAL

persons seeking to add a hazardous waste or a category, may petition under 260.20, 260.23, and Part 273, Subpart G.	142 E	273.80(a)					
what the petitioner must demonstrate to be successful; petition must include the 260.20(b) information; 273.81 factors	142 E	273.80(b)					
Administrator will use the 273.81 factors to evaluate and decide; factors on which the decision will be based	142 E	273.80(c)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
† FACTORS FOR PETITIONS TO INCLUDE OTHER WASTES UNDER 40 CFR PART 273							
1 waste or waste category, as generated by a wide variety of generators, is a listed waste or, if not listed, a proportion of the waste stream exhibits one or more of the 261, Subpart C hazardous waste characteristics; how the definition of universal waste is amended when a characteristic waste is added; only that portion of the waste stream exhibiting one or more characteristics (i.e., is a hazardous waste) is subject to Part 273	142 E, †181	273.81(a)					
waste or waste category is not exclusive to a specific industry or group of industries and is commonly generated by a wide variety of establishments	142 E, 237	273.81(b)					
waste or waste category is generated by a large number of generators and is frequently generated in small quantities by each generator	142 E	273.81(c)					
collection systems for waste or waste category would ensure close stewardship of the waste	142 E	273.81(d)					

CONSOLIDATED CHECKLIST C11
 Consolidated Checklist for Universal Wastes
 40 CFR Part 273 as of June 30, 2018 (cont'd)

FEDERAL REQUIREMENTS	CHECKLIST REFERENCE	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:			
				EQUIVALENT	LESS STRINGENT	MORE STRINGENT	BROADER IN SCOPE
low risk posed by accumulation and transport of waste or waste category; specific proposed management standards would be protective of human health and the environment during accumulation and transport	142 E	273.81(e)					
Part 273 regulation of waste or waste category will increase the likelihood that the waste will be diverted from non-hazardous waste management systems to recycling, treatment, or disposal in compliance with RCRA Subtitle C	142 E	273.81(f)					
Part 273 regulation will improve implementation and compliance with hazardous waste regulatory program	142 E	273.81(g)					
such other factors as may be appropriate	142 E	273.81(h)					

CONSOLIDATED CHECKLIST C11
40 CFR Part 273 as of **December 31, 2002** (cont'd)

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- 1 Revision Checklist 181 is optional for States that have not added spent lamps to their universal waste program or that have added spent lamps to their universal waste program and regulate spent lamps as stringently as the Federal program. For States that have universal waste programs that include spent lamps, but do not regulate spent lamps as stringently as the Federal program, Revision Checklist 181 is not optional.
- 2 Revision Checklist 181 (64 FR 36466; July 6, 1999) redesignated old 273.5 as 273.8, old 273.6 as 273.9, added a new 273.5, and added and reserved two new sections 273.6 and 273.7.
- 3 While this provision was optional when first added to the CFR by Revision Checklist 142 (60 FR 25492; May 11, 1995), States which have chosen to adopt the Universal Waste provisions must also adopt this revision. The revision, therefore, is considered conditionally optional.
- 4 There is a typographical error in the Federal Register for Revision Checklist 181 (64 FR 36466; July 6, 1999). In the revised definition of “universal waste”, “hazardous waste that are” should be “hazardous wastes that are”.
- 5 There appears to be an error in the Federal Register for Revision Checklist 181 (64 FR 36466; July 6, 1999). In the first two subparagraphs for the revised definition of “universal waste”, it appears that the ending colons were inadvertently removed. Thus, subparagraph (1) should end in “§ 273.2;” and subparagraph (2) should end “in § 273.3;”.
- 6 **Revision Checklist 209 (70 FR 45508, August 5, 2005) indicates that this provision was published in the final rule, but not changed.**
- 7 **An internal reference error in the final rule addressed by revision Checklist 237 (81 FR 85732, May 30, 2017) affects provisions 273.13(c)(2)(iii) and (iv) within the 2017 CFR. These provisions, regarding requirements for small quantity handlers of universal waste removing mercury-containing ampules from mercury-containing equipment, should be corrected by substituting references to “40 CFR 262.34” with “40 CFR 262.15 and 262.16”.**
- 8 There is an error in the Federal Register article for Checklist 142 D (60 FR 25492; May 11, 1995). The “and” found at the end of 273.13(c)(2)(viii) should be at the end of 273.13(c)(2)(vii).
- 9 **The final rule addressed by Revision Checklist 209 (70 FR 45508, August 5, 2005) added new provisions at 40 CFR 273.13(c)(3) and redesignated the previous provisions from CFR 273.13(c)(3) as 40 CFR 273.13(c)(4).**
- 10 **The final rule addressed by Revision Checklist 209 (70 FR 45508, August 5, 2005) added a new provision at 40 CFR 273.14(d)(1) and redesignated the previous provision from 273.14(d) as 273.14(d)(2).**
- 11 **An internal reference error in the final rule addressed by revision Checklist 237 (81 FR 85732, May 30, 2017) affects provisions 273.33(c)(2)(iii) and (iv) within the 2017 CFR. These provisions, regarding requirements for large quantity handlers of universal waste removing mercury-containing ampules from mercury-containing equipment, should be corrected by substituting references to “40 CFR 262.34” with “40 CFR 262.15 and 262.16”.**

CONSOLIDATED CHECKLIST C11
40 CFR Part 273 as of **December 31, 2002** (cont'd)

- 12 There is an error in the Federal Register article for Checklist 142 D (60 FR 25492; May 11, 1995). The “and” at the end of 273.33(c)(2)(viii) should be at the end of 273.33(c)(2)(vii).
- 13 **The final rule addressed by Revision Checklist 209 (70 FR 45508, August 5, 2005) added new provisions at 40 CFR 273.33(c)(3) and redesignated the previous provisions from 273.33(c)(3) as 40 CFR 273.33(c)(4).**
- 14 **The final rule addressed by Revision Checklist 209 added a new provision at 40 CFR 273.34(d)(1) and redesignated the provision formerly at 40 CFR 273.14(d) as 273.34(d)(2). As a result of these changes, there is no longer a provision at 40 CFR 273.14(d) requiring large quantity handlers of universal wastes to manage lamps to prevent releases. 40 CFR 273.14(d) was introduced by Revision Checklist 181 (64 FR 36466, July 6, 1999).**