

2. Universal Waste Handler Recordkeeping Requirements

RCRA regulates handlers of universal waste differently based on the total amount of universal waste generated or accumulated at any one time. A large quantity handler of universal waste is defined in 40 CFR Section 273.6 as a handler that accumulates 5,000 kg or more of universal waste at their location at any time. In contrast, a small quantity handler of universal waste is a facility which accumulates less than 5,000 kg of universal waste at any one time. Are large or small quantity handlers of universal waste required to keep records tracking their universal waste shipments?

Large quantity handlers of universal waste must track their universal waste shipments in accordance with the recordkeeping requirements under Section 273.39; small quantity handlers are not required to keep records of universal waste shipments (Section 273.19). The large quantity handler provisions require basic recordkeeping that tracks all universal waste shipments received and/or sent off-site from the facility. Records indicating receipt and/or shipment of universal waste must include the name and address of the originating facility or facility to which a universal waste was sent, the quantity of each type of universal waste received or sent, and the date of receipt or transport of universal waste. These records must be retained for a period of at least three years from the date the universal waste was either received or transported from the facility (Section 279.39(c)). The universal waste regulations do not require a specific recordkeeping form, but any standard business record such as a log, invoice, manifest, or bill of lading will generally be sufficient (Section 273.39(a), see also 60 FR 25530; May 11, 1995). Handlers should check with their state and/or implementing agency regarding potentially more stringent state regulations.