



Pollution Prevention



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Universal Wastes (Including Electric Lamps) and Lead Acid Batteries

Universal wastes are specific hazardous wastes that a business can choose to manage in an alternative manner in place of the more complex hazardous waste management requirements. These wastes are generated by many businesses and are often not properly managed according to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

Collection:

If you plan to handle material as universal waste you must keep the following in mind. If a site never accumulates more than 11,000 pounds of universal waste then it would be considered a small quantity handler of Universal Waste. If a site accumulates 11,000 pounds or more of Universal Waste at any time, the site would then be classified as a large quantity handler, which would require the site have a Michigan Site Identification Number from the Department of Environmental Quality (DEQ), Waste Management Division (WMD). Call (517) 335-5139 and request form [EQP 5150](#) and [instructions](#). For more details on small quantity or large quantity handler requirements see the [Universal Waste Guidance Document](#).

Spent electric lamps should be placed in a cardboard sleeve or in the box in which the replacement tubes arrived, or any other appropriate container that will prevent breakage prior to shipping off site or recycling on-site.

Lead acid batteries cannot be disposed of in a landfill and there is a penalty for improper disposal. Lead acid batteries should be in an area protected from flames and sparks and stored in a manner, which prevents their contents from being released into the environment and. They should be stored no more than one layer high on a pallet.

Transportation:

If you are transporting the following materials as **Universal Wastes**, in accordance with Rule 228 (R 299.9228) of Part 111 of Act 451, you are not required to get a National Uniform State Hazardous Material

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Program Permit from the DEQ, WMD:

batteries	mercury thermometers
lead acid batteries	mercury switches
electric lamps	other devices containing elementary mercury
some pesticides	CRTs (cathode ray tubes such as those from computers monitors or televisions)
mercury thermostats	

A transporter of Universal Waste is not required to get an identification number or required to obtain a hazardous waste transporter permit from DEQ, WMD under Part 111 of Act 451. However, if transporting a liquid waste such as liquid pesticides, you may be required to obtain a permit from the DEQ, WMD under Part 121 of Act 451. To obtain a Part 121 permit application call (517) 373-1217 or click on [Michigan Liquid Industrial Waste Uniform Program Permit Application](#).

A transporter is not allowed to dispose, dilute, or treat universal waste. A waste manifest is not required, but a transporter must comply with all applicable US Department of Transportation (US DOT) regulations, including having the shipment properly packaged, labeled, marked, placarded, and transported with the proper shipping papers. Contact US DOT at (517) 377-1866 for more information. Discuss permitting requirements with your DEQ, [WMD District Office](#) staff by clicking on the highlighted text for office locations and contact information.

A transporter of universal waste is required to deliver the shipment to a universal waste handler, destination facility, or foreign destination. A transporter who stores Universal Waste longer than 10 days, must manage the universal waste according to the applicable handler requirements in Rule 228(6)(b) of [Part 111](#) of Act 451.

Processing:

Processing of Universal Waste is usually performed at a destination facility, which is a facility that treats, disposes of, or recycles a particular category of universal waste. The destination facility and recycler requirements are too complex to adequately address in this document. Generally a destination facility must meet [Part 111](#) construction permit and operating license requirements in Rule 228(7)(a). Contact a WMD Hazardous Waste Program permit engineer by calling 517-373-4630 to discuss how these requirements apply to this type of facility.

It is recommended that all electric lamps be recycled, including those bulbs that are labeled low mercury. This can be accomplished by either shipping the spent lamps to a recycler or having a company come to your facility to collect the lamps. For more information on mercury click [here](#).

Electric lamp crushing units that are designed to crush lamps on-site will result in the necessity of having to characterize or test the resulting waste. This may result in the crushed material being required to be disposed as hazardous waste. If the residue from crushed bulbs is determined to be hazardous it must be handled as hazardous waste. The crushing of bulbs may also require a permit from the DEQ, Air Quality Division (AQD), contact your local DEQ, [AQD District Office](#) staff for more information.

Processing of Lead Acid Batteries:

Recycling is the only correct way to manage spent lead acid batteries. Retailers of lead acid batteries are required to accept customers' used lead batteries. Lead acid batteries are required to be recycled in accordance with Part 171, Battery Disposal, of Act 451. It should be noted that lead acid batteries cannot be disposed of in a landfill, and there is a penalty for improper disposal. Lead acid batteries should be stored in a manner, which prevents their contents from being released into the environment; they should be stored no more than one layer high on a pallet. The area in which they are stored should be constructed of an impervious surface, well ventilated, secure, protected from sparks or flames. No waste manifests are required for lead acid batteries being shipped for recycling. They must be handled in a way that will prevent their contents from being released into the environment or affect human health per Rule 804 of [Part 111](#).

For handling and storage of Universal Waste or lead acid batteries contact your local DEQ, [WMD District Office](#) staff for more information.

ADDITIONAL RESOURCE LINKS:

See the DEQ publications "[Electric Lamps](#)," "[Electronic Equipment](#)," and "[Universal Waste](#)." for more information.