

ITAD and Universal Waste for Facilities

The routing plan for a move-out

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Every stream on the floor, its rule, and its destination — decided before the first pallet moves.

01 · UNIVERSAL WASTE (40 CFR PART 273)

Five federal categories, streamlined handler rules

- Categories: batteries · pesticides (recalled/collected) · mercury-containing equipment (thermostats, switches) · lamps (fluorescent, HID) · aerosol cans (since 2019). State additions here: NJ — consumer electronics, oil-based finishes; PA — oil-based finishes; DE and MD follow the federal list.
- Two tiers: small quantity handler < 5,000 kg on site at any time (no EPA notification); large quantity handler ≥ 5,000 kg (notify EPA, get an ID number, keep shipment records 3 years, thorough training).
- One-year clock: accumulate no longer than one year from the date it became waste — date the container the day the first item goes in.
- Labels: "Universal Waste — Lamp(s) / Battery(ies) / Mercury-Containing Equipment / Aerosol Can(s)." Closed, sound containers; broken lamps and damaged batteries containerized.
- Ship only to another handler, a destination facility, or a foreign destination. Never a landfill; never a hauler who can't tell you which of those it is. Still hazardous waste — the rule streamlines, it does not exempt.

02 · NOT UNIVERSAL WASTE — OTHER RULES

Streams on the same floor under different programs

Stream	Regime	Destination
Fluorescent ballasts (pre-1979 may contain PCBs)	TSCA, 40 CFR 761	PCB-qualified ballast recycler; leaking ≠ intact
Refrigerants (rooftop units, splits, coolers)	Clean Air Act §608	Certified technician recovers before scrapping
Ionization smoke detectors (Am-241)	NRC guidance	Return to manufacturer / licensed recycler
Lithium-ion batteries (laptops, UPS modules)	EPA 2023 memo · DOT 49 CFR 173.185	Universal-waste handling; damaged cells ground-only
Lead-acid UPS batteries	RCRA lead-acid / universal waste	Permitted lead reclaimer; tracked
CRT monitors / TVs	EPA CRT rule · state disposal bans	Certified electronics recycler

03 · THE ELECTRONICS

Highest-liability stream on the floor — its own truck

The household hazardous-waste exemption does not apply to a business. PA and NJ ban covered electronics from disposal outright; RCRA generator liability follows the load everywhere. And every laptop, phone, copier, and pulled drive is a record of personal information the organization must provably destroy. Rule: anything with storage goes to a certified ITAD provider (NAID AAA + R2v3 with Appendix B) under chain of custody — NIST SP 800-88 Rev. 2 sanitization or destruction, serialized certificate per device, audited downstream for the rest. Electronics never ride with the scrap metal, the lamps, or the batteries.

04 · THE CHECKLIST

Decommissioning routing plan

- Walk the space first; list every stream; photograph the storage rooms.
- Assign each stream a rule and a destination in writing (this page is the template).
- Labeled, dated universal-waste containers from day one of collection.
- Segregate electronics immediately; inventory by serial; tag anything with storage for destruction.
- Verify vendors in the issuing bodies' directories (permits; i-SIGMA for NAID AAA; SERI for R2v3).
- Collect paperwork the same week: shipment records · bill of lading · chain of custody · serialized certificates · certificate of recycling. Reconcile against the inventory.
- File environmental records in the environmental file and destruction certificates in the information-security file; note retention.

Sources: 40 CFR Part 273 (universal waste); 40 CFR Part 761 (PCBs); Clean Air Act §608; EPA May 2023 lithium-ion battery memorandum; 49 CFR 173.185; NRC smoke-detector guidance; N.J.A.C. 7:26A-7; 25 Pa. Code Ch. 266b; NIST SP 800-88 Rev. 2. Federal thresholds shown; state programs differ. Informational only — not legal or environmental-compliance advice. Full brief: promo.ccr cyber.com/articles/facilities-itad-universal-waste-best-practices