



Revision: 05/23/2025
WASTE & MATERIALS
MANAGEMENT PROGRAM

UNIVERSAL WASTE – SMALL QUANTITY HANDLER

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, and mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, and mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: General

R.02: The handler does not dispose universal waste. This is also a violation of section 2.C., which is a statutory violation of s. 291.25(2) Wis. Stats.	673.11(1)
R.03: The handler does not dilute or treat universal waste.	673.11(2)
R.04: The handler does not accumulate universal waste for longer than one year.	673.15(1)
R.05: The handler is able to demonstrate the length of time the universal waste has been accumulated.	673.15(3)
R.06: Employees who manage universal waste are trained.	673.16
R.07: The handler immediately contains all releases of universal wastes.	673.17(1)
R.08: The handler determines whether any release of a universal waste is hazardous waste.	673.17(2)
R.09: The handler manages hazardous waste generated from the release of a universal waste in compliance with all applicable requirements of chapters NR 660 to 670.	673.17(2)
R.10: Universal waste is sent or taken to another universal waste handler, destination facility or foreign destination.	673.18(1)
R.11: The handler complies with the transporter requirements of subchapter D of chapter NR 673 Wis. Adm. Code while self-transporting the universal waste.	673.18(2)
R.12: The handler packages, labels, marks and placards the shipment, and prepares the proper shipping papers in accordance with the applicable U.S. Department of Transportation regulations under 49 CFR parts 172 to 180.	673.18(3)
R.13: Prior to sending a shipment of universal waste to another universal waste handler the receiving handler agrees to receive the shipment of the universal waste.	673.18(4)
R.14: If a shipment of universal waste was rejected, the waste was returned or sent to another destination facility.	673.18(5)
R.15: Universal waste was rejected and returned or sent to another destination facility.	673.18(6)
R.16: If the facility receives hazardous waste instead of universal waste, the department is notified.	673.18(7)
R.17: If the facility received waste that is non-hazardous and non-universal, the waste is managed with federal or local solid waste regulations.	673.18(8)
R.18: A small quantity handler of universal waste who sends universal waste to a foreign destination is subject to the requirements of subch. H of ch. NR 662.	673.20



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Section 2: Lamps

R.19: The facility is a handler of universal waste lamps. If NO, go to next section.		
R.20: The handler manages universal waste lamps in a manner that prevent releases of any universal waste to the environment.		673.13(4)
R.21: The handler contains any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps.		673.13(4)(a)
R.22: The handler immediately cleans up and places in a container any lamp that is broken and any lamp that shows evidence of breakage, leakage, or damage.		673.13(4)(b)
R.23: The handler clearly labels or marks each lamp or a container with any of the following phrases: "Universal Waste - Lamps", "Waste Lamps" or "Used Lamps."		673.14(5)

Section 3: Batteries

R.24: The facility is a handler of universal waste batteries. If NO, go to next section.		
R.25: The handler manages batteries in a manner that prevent releases of any universal waste to the environment.		673.13(1)
R.26: The handler contains any battery that showed evidence of leakage, spillage, or damage in a container.		673.13(1)(a)
R.27: The handler's actions did not caused a breach to the casing of an individual battery cell.		673.13(1)(b)
R.28: The handler who removes electrolytes from batteries, or who generates other solid wastes (e.g., battery pack materials, discarded consumer products) as a result of the activities listed in s. NR 673.13(1)(b), determined whether the electrolytes or other solid wastes exhibits a characteristic of hazardous waste.		673.13(1)(c)
R.29: The handler clearly labels or marks each battery or a container with one of the following phrases: "Universal Waste - Batteries", "Waste Batteries" or "Used Batteries."		673.14(1)

Section 4: Pesticides

R.30: The facility is a handler of universal waste pesticides. If NO, go to next section.		
R.31: The handler manages the pesticides in a way that prevents releases.		673.13(2)
R.32: The handler manges pesticides in a way that prevents releases of any universal waste to the environment.		673.13(2)



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Section 4: Pesticides

R.33: The label that was on the pesticides when purchased are on any recalled pesticides.	673.14(2)(a)
R.34: Recalled pesticides are marked "Universal Waste-Pesticides" or "Waste-Pesticides".	673.14(2)(b)
R.35: The handler clearly labels or marks each container, tank, transport vehicle, or vessel in which unused pesticides are contained with the label that was on the product if still legible. If using the product labels is not feasible, then label as required.	673.14(3)(a)
R.36: Containers, tanks, transport vehicles are marked "Universal Waste - Pesticides" or "Waste - Pesticides".	673.14(3)(b)

Section 5: Mercury-Containing Equipment

R.37: The facility is a handler of universal waste mercury containing equipment. If NO, go to next section.	673.13(3)
R.38: The handler manages mercury-containing equipment in a way that prevents releases to the environment.	673.13(3)
R.39: The handler places in a container any mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leakage in a container.	673.13(3)(a)
R.40: The handler removed mercury-containing ampules from mercury-containing equipment in a way to prevent breakage of the ampules.	673.13(3)(b)1.
R.41: The handler removes mercury-containing ampules from mercury-containing equipment only over or in a containment device (e.g., tray or pan sufficient to collect and contain any mercury released from an ampule in case of breakage).	673.13(3)(b)2.
R.42: The handler removes mercury-containing ampules from mercury-containing equipment only when there is a mercury clean-up system to immediately transfer any mercury resulting from spills or leaks from broken ampules, from the containment device to a container that meets the requirements of s. NR 662.0015 or 662.016.	673.13(3)(b)3
R.43: The handler removing mercury-containing ampules from mercury-containing equipment is able to immediately transfer any released mercury from the containment device to a container that meets the requirements of s. NR 662.015 or 662.016.	673.13(3)(b)4.
R.44: The area where the mercury-containing ampules are removed from the mercury-containing equipment is provided with ventilation and monitoring to ensure compliance with applicable exposure levels for mercury adopted under 29 USC 651 to 678 or s. 101.055, Stats.	673.13(3)(b)5.
R.45: The employees removing mercury-containing ampules from mercury-containing equipment are thoroughly familiar with proper waste mercury handling and emergency procedures, including transfer of mercury from devices to appropriate containers.	673.13(3)(b)6.
R.46: The handler removing mercury-containing ampules from mercury-containing equipment stores the removed ampules in closed, non-leaking containers that are in good condition.	673.13(3)(b)7.
R.47: The handler removing mercury-containing ampules from mercury-containing equipment packs the removed ampules in the container with packing materials that are adequate to prevent breakage during storage, handling, and transportation.	673.13(3)(b)8.

Key : C or EV: Evaluated - no noncompliance detected at the time of inspection

CA: Compliance with Concern

R: Returned to Compliance

X or V: Non-Compliance

Y: Yes

N: No

UN: Unknown

NA: Inspected, Not Applicable

NE: Evaluation Determination will be Made at a Later Date

NI: Not Inspected

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*: Dept. approved alternate may apply

No 'box' is an open ended question

ND: Inspected, Not Determined

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Section 5: Mercury-Containing Equipment

R.48: The handler of mercury-containing equipment that does not contain an ampule (e.g., such as a barometer or manometer) immediately seals the equipment holding the mercury with an air-tight seal to prevent the release of any mercury to the environment.	673.13(3)(c)1.
R.49: The handler of mercury-containing equipment that does not contain an ampule (e.g., such as a barometer or manometer) follows all requirements for removing ampules and managing removed ampules under s. NR 673.13(3)(b).	673.13(3)(c)2.
R.50: The handler removing mercury-containing ampules from the mercury-containing equipment or seals the mercury from mercury-containing equipment determines if the mercury or clean-up residues resulting from spills or leaks exhibit a characteristic of hazardous waste identified in subchapter C of chapter NR 661.	673.13(3)(d)1.a.
R.51: The handler removing mercury-containing ampules from mercury-containing equipment or seals mercury from mercury-containing equipment determines if other solid waste generated as a result of the removal of mercury-containing ampules or housings exhibit a characteristic of hazardous waste identified in subchapter C of chapter NR 661.	673.13(3)(d)1.b.
R.52: The handler removing mercury-containing ampules from mercury-containing equipment or seals mercury from mercury-containing equipment manages all of the mercury, residues, or other solid waste that exhibited a characteristic of hazardous waste in compliance with all applicable requirements of chapters NR 660 to 670. The handler is considered the generator of the mercury, residues or other waste and shall manage it subject to chapter NR 662.	673.13(3)(d)2.
R.53: The handler removing mercury-containing ampules from mercury-containing equipment or seals mercury from mercury-containing equipment in its original housing manages all of the mercury, residues, or other solid waste that did not exhibit a characteristic of hazardous waste in compliance with chapters 287 and 289, Stats., chapters NR 500 to 524, and applicable federal solid waste regulations.	673.13(3)(d)3.
R.54: The handler clearly labels or marks each mercury-containing equipment (i.e., each device), or container with any of the following phrases: "Universal Waste - Mercury-Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment."	673.14(4)(a)
R.55: The handler clearly labels or marks each mercury-containing thermostat or container containing only mercury-containing thermostats with any of the following phrases: "Universal Waste - Mercury Thermostats," "Waste Mercury Thermostats" or "Used Mercury Thermostats."	673.14(4)(b)

Section 6: Aerosol Cans

R.61: Aerosol cans are stored in structurally sound, compatible containers that show no signs of leakage or damage and are kept away from heat sources.	673.33(5)(a)
R.62: Leaking aerosol cans are placed in sealed containers with absorbents or punctured and drained per s. NR 673.33(5)(d).	673.33(5)(b)
R.63: Handlers may sort, mix, or remove actuators from aerosol cans, provided each can remains intact and unbreached.	673.33(5)(c)
R.64: Empty, punctured aerosol cans must be recycled.	673.33(5)(d)
R.65: Puncturing and draining must be done with a device designed to safely contain residuals and emissions.	673.33(5)(d)1.



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Section 6: Aerosol Cans

R.66: Handlers must have written procedures for safe puncturing and draining, keep device instructions onsite, and train staff accordingly.	673.33(5)(d)2.
R.67: Puncturing must prevent fire and releases, and be done on a stable, well-ventilated surface.	673.33(5)(d)3.
R.68: Contents from drained cans must be immediately transferred to containers that meet applicable NR 662 requirements.	673.33(5)(d)4.
R.69: A hazardous waste determination must be made for drained contents; if hazardous, manage under chs. NR 660–672 and NR 662.	673.33(5)(d)5.
R.70: If drained contents are nonhazardous, manage in accordance with applicable solid waste regulations.	673.33(5)(d)6.
R.71: A written spill response procedure and clean-up kit must be in place; all spills must be promptly cleaned up.	673.33(5)(d)7.
R.72: Aerosol cans or their containers must be clearly labeled with: “Universal Waste—Aerosol Can(s),” “Waste Aerosol Can(s),” or “Used Aerosol Can(s).”	673.14(6)