



**STATE OF TENNESSEE  
DEPARTMENT OF TRANSPORTATION  
ENVIRONMENTAL COMPLIANCE OFFICE**

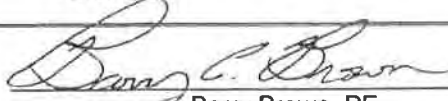
SUITE 900 - JAMES K. POLK BUILDING  
505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-0334

**TDOT STANDARD OPERATING PROCEDURE - ENVIRONMENTAL**

**NO.**  
014

**Subject: UNIVERSAL WASTE MANAGEMENT**

Reviewed and approved by:

  
Barry Brown, PE

05-02-17  
Date

Facilities and MS4/TSCS Program Manager, TDOT Environmental Compliance Office

  
Toks Omishakin

5-5-17  
Date

Environmental Bureau Chief, TDOT Environmental Planning Bureau

Status: Revised and re-approved with no significant changes.

Version 5 – Replaces  
Version 4 dated April 2016

**1.0 PURPOSE AND SCOPE**

“Universal wastes” are a subset of hazardous wastes which, because they are so universally generated in commerce and industry and generally present only limited hazards, are subject to more relaxed regulatory requirements and do not “count” as hazardous waste. Universal wastes include, but are not limited to, certain lamp bulbs and tubes (such as fluorescent, high-intensity discharge, neon, mercury vapor, high pressure sodium, and nickel halide); certain batteries (such as nickel-cadmium, lithium, and mercury oxide); and mercury-containing thermostats. TDOT’s policy is for all TDOT facilities to manage their universal wastes as Small Quantity Handlers of universal waste. Waste Management Profiles have been developed describing how the universal wastes generated by TDOT facilities are to be collected and handled. This Standard Operating Procedure further describes the offsite shipment and disposition of universal wastes from TDOT facilities.

1. Accumulation areas (AAs) for universal wastes will be located indoors, protected from the weather. The storage area will be located to protect universal wastes from being broken or damaged.
2. Each box or container of universal waste will be marked with the words “Universal Waste” and the type of waste (e.g., light tubes).
3. A sign with the words “Universal Waste” with the type of waste should be placed in the universal waste accumulation area.

4. The date the first universal waste was placed in the container will be clearly marked on the container.
5. All universal waste containers will be in good condition and kept closed.
6. The Regional Environmental Technical Group is responsible for organizing the transport and disposal of universal wastes from TDOT facilities in their Region. The Technical Group Representative will also complete and sign all appropriate waste shipping papers necessary for the transport and disposal of universal waste.
7. Universal wastes cannot be stored at a facility for greater than six months, beginning with the date the first universal waste was placed in the container. As such, universal wastes should be picked up from the Region and District facilities twice a year at a minimum.
8. County and District facilities should “ship up” (transport) Universal Waste to their corresponding District or Region facility every six months, or as directed by the Regional Environmental Coordinator section. Prior to transporting the Universal Waste, facility personnel should contact the receiving District/Region. The originating and receiving facilities must complete Material Transfer Forms for each shipment of universal waste received and maintain a copy of the completed form.
9. Universal waste shipped up from another TDOT facility may be combined with the receiving facility’s universal waste.
10. From the Region facilities, universal wastes may only be shipped by transporters and to receiving facilities that have appropriate identification numbers and are authorized to handle such universal wastes. Any contractor for recycle of universal wastes must be approved by the Environmental Compliance Office prior to contract letting for recycling of universal wastes.
11. Container requirements for universal wastes are as follows:
  - a. Each TDOT facility will accumulate and transport universal wastes in the container types specified on the Waste Management Profile sheet for the specific universal waste type.
  - b. If the TDOT-approved Vendor provides or specifies container types different from those described on the Waste Management Profile sheet, the Vendor-specified/provided containers will be used, unless TDOT determines such container types are not compliant with U.S. DOT requirements or are otherwise unsuitable.
  - c. In the event the Vendor determines that a container is not suitable for transport, the Vendor may “over pack” the container into an acceptable container or transfer universal waste to an acceptable container.
12. All universal waste containers to be picked up by the Vendor must be labeled as required under U.S. DOT hazardous material transportation regulations depending upon the waste type and quantity. The Vendor will verify that the container is appropriately labeled prior to offsite transport. In the event the labeling is not adequate, the Vendor will provide appropriate labels.

13. The transporter must leave a signed and dated copy of all appropriate waste shipping papers with the TDOT facility's environmental contact prior to leaving the facility. Universal wastes will typically be shipped with either a uniform hazardous waste manifest or a bill of lading.
14. All shipping papers shall be maintained in the appropriate color-coordinated notebook at the shipping facility for at least three years from the date of shipment.