MAINE LABPACK, INC.

Federal and Maine Universal Waste Updates

A practical guide for Maine facilities | October 30, 2026

Maine's universal waste revisions took effect July 7, 2026. Facilities should update collection practices, generator classifications, and shipping arrangements to reflect the expanded state program. [1, 2]

Federal requirements and Maine additions

- **Federal framework.** 40 CFR Part 273 covers batteries, certain pesticides, mercury-containing equipment, lamps, and aerosol cans. Federal small quantity handlers hold less than 5,000 kg of total universal waste; large quantity handlers hold 5,000 kg or more. Federal rules generally allow one year of accumulation and do not require a hazardous waste manifest. Maine requirements differ. [3, 4]
- **Maine additions.** Chapter 858 now includes aerosol cans and electronic devices; LED lamps were added to the lamp category. Aerosols were already a federal universal waste category. [1, 5]
- **Storage practices.** Keep electronic waste collection containers, including gaylords, closed between additions or removals. Include office, maintenance, and information technology cleanouts in the facility inventory. [1]

How the 200 item threshold works

- **Count individual items.** Each qualifying discarded aerosol can and each electronic device is one item. A box of 50 cans counts as 50 items. A gaylord holding 30 electronic devices counts as 30 items. Count these together with other applicable universal waste items. [1]
- **Small Universal Waste Generator.** For the ordinary item-count threshold, generate no more than 200 combined items in any calendar month AND accumulate no more than 200 on site at any one time. Exactly 200 is within this threshold. [1]
- **Large Universal Waste Generator.** Exceeding 200 under EITHER test triggers the large category. Shipping frequently may reduce on-site inventory but does not erase items generated during that month. [1]
- **Example.** 150 aerosol cans + 60 electronic devices = 210 items, even if packed in two boxes. This exceeds the small-generator item limit. Two hundred is a combined facility limit, not a separate allowance for each waste type. [1]
- **Special provisions.** Chapter 858 provides separate limits for motor vehicle mercury switches and cathode ray tubes and specific battery provisions. Apply the complete definitions in sections 4 and 12. [1, 6]

Universal waste status is separate from hazardous waste generator status. Exceeding 200 universal waste items does not by itself make a site a hazardous waste Fully-Regulated Generator. Qualifying wastes managed under universal waste rules are excluded from federal hazardous waste generator-category counting. [3]

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Universal Waste Updates

Facility actions and compliance resources

Maine aerosol codes and shipping paperwork

- **Use the universal waste route correctly.** Aerosol cans containing characteristic and/or listed hazardous waste can be managed under Chapter 858 when its conditions are met. Universal waste is a management category; it does not mean the contents are non-hazardous. [1]
- **Use the new ME UBOL unit codes.** DEP's 2026 factsheet adds AE for Aerosol Cans and ED for Electronic Devices to Item 11 of the Maine Uniform Bill of Lading instructions. The form also adds NH for Non-Hazardous waste and SP for Solar Panels. [1]
- **Keep code systems distinct.** AE and ED are Maine shipping-form unit codes, not EPA hazardous waste codes such as D001, or DOT UN/NA numbers. Adding NH or SP to the form does not itself establish universal waste eligibility. Confirm the waste description, applicable waste codes, and DOT classification before shipment. [1, 2]
- **Address punctured contents separately.** Maine allows aerosol puncturing without a license only if its conditions are met. The puncturing handler must determine the drained contents' hazardous waste status and applicable codes; do not automatically carry the intact-can universal waste designation over to collected liquid. [1, 7]

Obtain or confirm your site identification number

MEX020000000 has been discontinued. Universal waste-only generators shipping on a hazardous waste manifest or ME UBOL need a unique EPA or State ID, including sites below the 200-item threshold. [1]

Register for an EPA RCRAInfo Industry User account

Check for an existing ID at the physical location before requesting another. Use myRCRAid to request or update the site ID. Account registration alone does not issue an EPA ID; submit the site notification for DEP approval. For help or a State ID option, call Maine DEP at (207) 287-7688. [1, 9]

Prepare for pickup

1. **Update the inventory.** Track individual items, monthly generation, and on-site accumulation.
2. **Confirm the shipment.** Verify site ID, current ME UBOL codes, receiving facility acceptance, packaging, and required records.
3. **Protect employees.** Contain leaking aerosol cans and keep them away from heat. Confirm lithium battery packaging and DOT requirements, especially for damaged batteries. [7, 8]

Maine Labpack can help review waste streams, collection practices, shipping arrangements, and employee training. Call (207) 767-1933 or visit MaineLabpack.com.

Sources

[1] DEP 2026 factsheet and FAQ | [2] Maine DEP adopted rules
[3] EPA Universal Waste | [4] EPA State Programs
[5] EPA Aerosol Rule | [6] Maine DEP Handbook
[7] EPA Universal Waste FAQ | [8] EPA Lithium Battery FAQ
[9] RCRAInfo registration resources

General information as of publication. Verify current rules and waste-specific requirements before shipment.