

Mail-back Programs for Mercury, Lighting, Dental, Medical, Non-Hazardous Pharmaceutical and Electronic Wastes

Reviewed/revised July 2019

This guidance is for businesses that generate smaller quantities of certain wastes that may not have ready access to appropriate disposal programs. It is also intended to encourage local governments and regional county cooperatives to develop household collection programs for one or more of these wastes, or a combined collection program for business and household wastes.

The problem

Regulations for wastes generated by businesses and other non-household facilities, such as schools and government agencies, are usually more stringent than those for households. Small mercury-containing devices (for example: thermometers, thermostats, blood pressure cuffs, barometers, etc.), mercury-containing lamps, batteries and electronics are regulated as hazardous wastes when non-household facilities produce them. These wastes cannot be disposed of in the regular trash or dumpster. However in some cases they can be managed under the universal waste rule. Universal wastes come from products that are used widely. However, a facility may generate these wastes sporadically, which makes proper management of these wastes harder to do.

PCB-containing light ballasts are regulated under the Toxic Substances Control Act (TSCA). Sharps (like needles and lancets) and other medical wastes are regulated under several regulatory programs including state solid waste, federal Occupational Safety and Health Administration (OSHA) and US Department of Transportation regulations. These regulations place restrictions on how ballasts and medical wastes can be managed and disposed.

A potential solution

There are many prepaid mail-back programs for these common wastes that can help everyone stay in compliance with the regulations more easily (see Appendix A). Mail-back programs generally include a waste collection container, an outer shipping container and a prepaid shipping label with instructions. Make sure to stay within the limits of the program and follow the instructions provided. Prepaid collection kits are useful for smaller amounts of these common wastes and often come in a variety of sizes.

Mail-back programs are designed to meet the regulatory requirements for businesses, schools and government agencies, but households can also use them for recycling or disposing of similar household wastes in an environmentally sound manner. Because these programs are designed to meet the more stringent requirements, you can mix household and non-household wastes in the same container. Local governments, regional county cooperatives and public-private partnerships could benefit by working together to share the costs of providing these services in their area.

Additional considerations

Using a mail-back program does not relieve you of your responsibility to understand and follow applicable regulations. There are some state-specific requirements that these nationally-available

programs do not take into consideration. For example, businesses in Colorado that generate infectious medical wastes must have and use a written medical waste management plan appropriate for their facility and the waste types they generate. However, using a sharps and/or red-bag medical waste mail-back program can be included in the plan to cover proper waste handling and disposal.

Another example is the requirement for universal waste containers to be labeled with the words "Universal Waste xxxx," "Waste xxxx," or "Used xxxx," where xxxx is the type of waste. If the collection container is not pre-printed with this label, you must ensure the container is properly labeled. Although specific training requirements may be limited, it is good business practice to train all staff handling these wastes on how to use the mail-back program, what wastes are accepted, safe waste handling practices and what to do in case of a spill. Staff should be provided appropriate personal protective equipment, a spill kit and other equipment necessary for safe materials handling.

For more information

Please contact one or more mail-back program vendors to compare services and pricing. If you have questions regarding what requirements apply to your situation, please feel free to contact our Customer Technical Assistance Program at:

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
Customer Technical Assistance
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Customer Technical Assistance: 303-692-3320 or toll-free 1-888-569-1831 ext.3320

Email: comments.hmwmd@state.co.us

Website: www.colorado.gov/cdphe/hm

Appendix A - Mail-back recycling kits

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This list includes companies that have prepaid mail-back recycling kits for small amounts of common wastes.
Contact the selected vendor or visit their website for more information.

<p>AERC Recycling Solutions Allentown, PA 866-447-5177 http://www.aerc.com/RecycleKits/</p>	<p>Lamps, CFLs, non-PCB ballasts, batteries, amalgam, mercury-containing devices, e-waste (RecycleKits)</p>
<p>Air Cycle Corporation Lisle, IL 888-640-6700 www.lamprecycling.com</p>	<p>Lamps, CFLs, non-PCB ballasts, batteries, e-waste, mercury thermostats (EasyPak)</p>
<p>Amalgaway Mail Disposal Service Indianapolis, IN 800-267-1467 www.amalgaway.com</p>	<p>Amalgam, lead foil, lead aprons</p>
<p>Bethlehem Apparatus Co. Inc. Hellertown, PA 610-838-7034 www.bethlehemapparatus.com</p>	<p>Lamps, CFLs, batteries, mercury devices, amalgam, mercury-contaminated solids/liquids, mercury salts and compounds; large quantity shipping containers</p>
<p>Big Green Box Anaheim, CA 877-461-2345 www.biggreenbox.com</p>	<p>Batteries</p>
<p>Complete Recycling Solutions, LLC Fall River, MA 866-277-9797 www.crsrecycle.com</p>	<p>Lamps, CFLs, non-PCB ballasts, rechargeable batteries, mercury devices (CRS-PAK)</p>
<p>DRNA (Dental Recycling North America) New York, NY 800-360-1001 www.drna.com</p>	<p>Amalgam, lead foil, lead aprons, sharps, pharmaceuticals</p>
<p>EcoLights Seattle, WA 888-214-2327 www.ecolights.com</p>	<p>Lamps, CFLs, non-PCB ballasts, e-waste, batteries</p>
<p>EverLights Chicago, IL 877-934-9873 http://www.everlights.com/</p>	<p>Lamps, CFLs, batteries, non-PCB ballasts, e-waste</p>

This is not a complete list of companies providing these services. The Colorado Department of Public Health and Environment in no way recommends, endorses or certifies the services of the companies listed.

Appendix A

<p>Fluorecycle, Inc. Ingleside, IL 815-363-4411 www.fluorecycle.com/cartonprogram.php</p>	<p>Lamps, CFLs, non-PCB ballasts, batteries, thermostats, e-waste</p>
<p>Grainger Locations in Colorado 800-472-4643 www.grainger.com</p>	<p>Lamps, CFLs, non-PCB ballasts, batteries, mercury devices, e-waste, pharmaceuticals (RecyclePak)</p>
<p>GRP & Associates Clear Lake, IA 800-207-0976 www.sharpsdisposal.com</p>	<p>Sharps, red bag medical</p>
<p>Green Lights Recycling, Inc. Blaine, MN 763-785-0456 http://www.glrnow.com/store/</p>	<p>Lamps (Express Lamp-Pak)</p>
<p>HCS (Healthcare Compliance Service) Palm Bay, FL 888-726-8505 www.hcstoday.com</p>	<p>Amalgam, lead foil, lead aprons, fixer, sharps, red bag medical</p>
<p>Lampmaster Mason, MI 888-470-4835 www.lampmaster.com</p>	<p>Lamps, CFLs, mercury devices, non-PCB ballasts, batteries, e-waste, aerosol cans, exit signs, smoke detectors (Lampmaster, Pailmaster)</p>
<p>Lighting Resources LLC Phoenix, AZ (Rocky Mountain region) 800-866-6818 www.lightingresourcesinc.com</p>	<p>Lamps, CFLs, non-PCB ballasts, batteries, mercury devices, e-waste, smoke detectors, tritium signs (EZ on the Earth program)</p>
<p>Maguire Refining, Inc Minneapolis, MN 800-486-2858 www.maguireref.com</p>	<p>Amalgam, amalgam sludge, separator filters, lead foil, film, fixer</p>
<p>Medasend Biomedical Long Beach, CA 800-200-3581 www.medasend.com</p>	<p>Amalgam, separator filters, lead foil, sharps, X-ray fixer, pharmaceuticals</p>
<p>Medpro Waste Disposal Naperville, IL 888-641-8131 www.medprodisposal.com</p>	<p>Red bag medical, sharps, pharmaceutical</p>
<p>NLR, Inc./Bak-Pak East Windsor, CT 888-657-5267 www.go-bak.com</p>	<p>Lamps, CFLs, non-PCB ballasts, batteries</p>

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<p>Office Depot Locations in Colorado 800-463-3768 www.officedepot.com</p>	<p>E-waste (Tech Recycling Services) Purchase in-store or online</p>
<p>Recycle Technologies, Inc. Milwaukee, WI 800-305-3040 Minneapolis, MN 800-969-5166 www.recycletechnologies.com</p>	<p>Lamps, CFLs (SimplePac)</p>
<p>Republic Services, Inc. Phoenix, AZ 855-737-7871 http://www.republicsharps.com/</p>	<p>Sharps</p>
<p>Sharps Assure Lakewood, NJ 855-974-2777 www.sharpsassure.com</p>	<p>Sharps, amalgam, lead foil, pharmaceuticals</p>
<p>Sharps Compliance, Inc. Houston, TX 800-772-5657 www.sharpsinc.com</p>	<p>Lamps, CFLs, non-PCB ballasts, batteries, mercury devices, amalgam, amalgam sludge, lead foil, lead aprons, film, sharps, red bag medical, pharmaceutical</p>
<p>Stericycle, Inc. Northbrook, IL 800-355-8773 https://store.stericycle.com/</p>	<p>Sharps, red bag medical</p>
<p>Veolia Environmental Services Greenville, WI 888-669-9725 http://lamprecycling.veoliaes.com/</p>	<p>Lamps, CFLs, ballasts, batteries, mercury devices, e-waste, amalgam, separator filter, lead foil, fixer, sharps, red bag medical, pharmaceutical</p>
<p>Waste Management Minneapolis, MN 800-664-1434 www.wmlamptracker.com</p>	<p>Lamps, CFLs, non-PCB ballasts, batteries, mercury devices, e-waste, aerosol cans, amalgam, separator filters, lead foil, sharps, red bag medical</p>

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