



This is intended as general guidance 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**

For the most part, wastes generated by businesses and other non-household facilities, like schools and government agencies, are subject to more regulation than similar wastes generated by households. Small mercury-containing devices (for example: thermometers, thermostats, blood pressure cuffs, barometers, etc.), mercury-containing lamps, batteries, dental amalgam, and electronics are regulated as hazardous wastes when generated by non-household facilities. These wastes cannot be disposed of in the regular trash or dumpster. They can, however, be managed under a reduced set of requirements called “universal waste” (see [www.cdphe.state.co.us/hm/uwrgeneral.pdf](http://www.cdphe.state.co.us/hm/uwrgeneral.pdf)). Wastes managed under the universal waste rules are subject to wide spread use, but are often generated on a sporadic basis by any one particular facility. This makes the collection and proper management of these wastes more difficult.

PCB-containing light ballasts are regulated under the Toxic Substances Control Act (TSCA). Sharps (like needles and lancets) and other infectious 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 infectious medical wastes can be managed and disposed.

These same wastes are subject to less stringent requirements if generated by households, but that doesn't make them any less toxic or dangerous. Although these common household wastes are not currently banned from landfill disposal, many local governments are interested in keeping them out of their landfills while providing cost-effective disposal services instead.

## **A Potential Solution**

There are several prepaid mail-back programs for these common wastes that are intended to help everyone stay in compliance with the regulations with minimal fuss (see Appendix A). Mail-back programs generally include a primary waste collection container, an outer shipping container, a prepaid shipping label, and instructions. All you have to do is stay within the limits of the program and follow the instructions provided. Prepaid collection kits are great for smaller quantities of these common wastes and often come in a variety of sizes.

The mail-back programs are designed to address regulations applicable to businesses, schools and government agencies, but are just as effective for recycling or disposing of similar household wastes in an environmentally sound manner. And because these programs are designed to meet the more stringent requirements, it's okay to mix household and non-household wastes in the same container. Therefore, many local governments, regional county cooperatives, and public-private partnerships would benefit by working together to share the costs of providing these services in their area.

## One Condition

The use of a mail-back program does not totally relieve you of your responsibility to understand and follow applicable regulations. There are a few state-specific requirements that these nationally-available programs can't cover, but you are still responsible for. For example, businesses in Colorado that generate infectious wastes must have and implement an onsite infectious waste management plan that is appropriate for their particular facility and the types of wastes generated (see [www.cdphe.state.co.us/hm/infected.pdf](http://www.cdphe.state.co.us/hm/infected.pdf)). However, the use of a sharps and/or red-bag medical waste mail-back program can be incorporated into this plan to address the proper waste handling and disposal sections of the plan.

Another example is that containers holding universal wastes must be labeled with the words "Universal Waste xxx," "Waste xxx," or "Used xxx," where xxx is the type of waste (see [www.cdphe.state.co.us/hm/uwrgeneral.pdf](http://www.cdphe.state.co.us/hm/uwrgeneral.pdf)). If the collection container is not pre-printed with this label, you are responsible for ensuring the container is properly labeled. And although there may be few, if any, specific training requirements, it is always good business practice to ensure that all staff that handle these wastes be trained on how to utilize the mail-back program, the waste acceptance criteria, safe waste handling practices, and what to do in case of a spill. If needed, staff should be provided with appropriate personal protective equipment (PPE), 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

Phone: 303-692-3320  
Toll-free: 1-888-569-1831 ext 3320  
Website: [www.cdphe.state.co.us/hm/](http://www.cdphe.state.co.us/hm/)  
E-mail: [comments.hmwmd@state.co.us](mailto:comments.hmwmd@state.co.us)

**Mail-back Recycling Kits**

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The purpose of this list is to assist you in locating companies that have prepaid mail-back recycling kits for smaller quantities of common wastes. Contact the selected vendor or visit their website for more information.

<b>AERC Recycling Solutions</b> Allentown, PA 866-447-5177 <a href="http://www.recyclekit.com">www.recyclekit.com</a>	lamps, CFLs, batteries, amalgam, electronics (RecycleKits)
<b>Air Cycle Corporation</b> Broadview, IL 888-640-6700 <a href="http://www.lamprecycling.com">www.lamprecycling.com</a>	thermostats, lamps, CFL, ballasts, batteries, electronics (EasyPak)
<b>Amalgaway Mail Disposal Service</b> Indianapolis, IN 800-267-1467 <a href="http://www.amalgaway.com">www.amalgaway.com</a>	amalgam, lead foil
<b>Becton, Dickinson and Company (BD)</b> Franklin Lakes, NJ 888-232-2737 <a href="http://www.bddiabetes.com/us/">www.bddiabetes.com/us/</a>	sharps  (purchase in local drugstores, mail for disposal)
<b>Bethlehem Apparatus Co. Inc.</b> Hellertown, PA 610-838-7034 <a href="http://www.bethlehemapparatus.com">www.bethlehemapparatus.com</a>	small mercury devices, lamps, CFLs, large quantity mercury flasks
<b>Big Green Box</b> Anaheim, CA 877-461-2345 <a href="http://www.biggreenbox.com">www.biggreenbox.com</a>	batteries, cell phones, calculators, cameras, power tools
<b>Cleanlights Recycling / USA Lamp</b> Mason, MI 888-676-0044 Cincinnati, OH 800-778-6645 Spartanburg, SC 864-579-4800 <a href="http://www.usalamp.com">www.usalamp.com</a>	lamps, CFLs, ballasts, batteries (Lampmaster, Pailmaster)
<b>Complete Recycling Solutions, LLC</b> Fall River, MA 866-277-9797 <a href="http://www.crsrecycle.com">www.crsrecycle.com</a>	small mercury devices, lamps, CFLs, ballasts, batteries (CRS-Pak)
<b>Dental Recycling North America</b> New York, NY 800-360-1001 <a href="http://www.drna.com">www.drna.com</a>	amalgam, lead foil, dental filters, sharps
<b>Ecolights</b> Seattle, WA 888-214-2327 <a href="http://www.ecolights.com">www.ecolights.com</a>	small mercury devices, lamps, CFLs, ballasts
<b>Fluorecycle, Inc.</b> Ingleside, IL 815-363-4411 <a href="http://www.fluorecycle.com">www.fluorecycle.com</a>	thermostats, lamps, CFLs, ballasts, batteries, electronics
<b>Grainger</b> Locations in Colorado 800-323-0620 <a href="http://www.grainger.com">www.grainger.com</a>	small mercury devices, lamps, CFLs, ballasts, batteries, electronics (RecyclePak)

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><b>Healthcare Compliance Service</b>  Palm Bay, FL  888-726-8505  <a href="http://www.hcstoday.com">www.hcstoday.com</a></p>	<p>small mercury devices, batteries, amalgam, lead foil, sharps, red bag medical</p>
<p><b>Lighting Resources Inc.</b>  Ontario, CA 888-923-7252  Phoenix, AZ 800-866-6818  Tampa, FL 866-961-9100  <a href="http://www.lightingresourcesinc.com">www.lightingresourcesinc.com</a></p>	<p>thermostats, lamps, ballasts, batteries (EasyPak)</p>
<p><b>Medasend Biomedical</b>  Long Beach, CA  800-200-3581  <a href="http://www.medasend.com">www.medasend.com</a></p>	<p>small mercury devices, batteries, amalgam, lead foil, dental filters, sharps, red bag medical</p>
<p><b>Mercury Technologies of Minnesota</b>  Pine City, MN  800-864-3821  <a href="http://www.mercurytechnologies-mn.com">www.mercurytechnologies-mn.com</a></p>	<p>lamps, CFLs</p>
<p><b>Office Depot</b>  locations in Colorado  800-GO-DEPOT  <a href="http://www.officedepot.com">www.officedepot.com</a></p>	<p>lamps, CFLs, batteries, electronics (RecyclePak)</p>
<p><b>Rechargeable Battery Recycling Corp (RBRC)</b>  Atlanta, GA  877-723-1297 ext. 250  <a href="http://www.rbrc.org">www.rbrc.org</a></p>	<p>rechargeable batteries</p>
<p><b>Recycle Technologies, Inc.</b>  Milwaukee, WI 800-305-3040  Minneapolis, MN 800-969-5166  <a href="http://www.recycletechnologies.com">www.recycletechnologies.com</a></p>	<p>lamps, CFLs (Simplepac)</p>
<p><b>Sharps Compliance, Inc.</b>  Houston, TX  800-772-5657  <a href="http://www.sharpsinc.com">www.sharpsinc.com</a></p>	<p>sharps, red bag medical</p>
<p><b>Thermostat Recycling Corp (TRC)</b>  800-238-8192  <a href="http://www.nema.org/gov/ehs/trc">www.nema.org/gov/ehs/trc</a></p>	<p>thermostats</p>
<p><b>Veolia (formerly Onyx)</b>  Henderson, CO  303-289-4827  <a href="http://veoliaes-ts.com/recyclepak">veoliaes-ts.com/recyclepak</a></p>	<p>small mercury devices, lamps, CFLs, ballasts, batteries, amalgam, lead foil, sharps, electronics (RecyclePak)</p>
<p><b>Waste &amp; Compliance Management, Inc</b>  Carlsbad, CA  866-436-9264  <a href="http://www.wastewise.com">www.wastewise.com</a></p>	<p>amalgam, lead foil, dental filters</p>
<p><b>Waste Management</b>  Roseville, MN  800-664-1434  <a href="http://www.wmlamptracker.com/">www.wmlamptracker.com/</a></p>	<p>small mercury devices, lamps, CFLs, ballasts, batteries, amalgam, lead foil, dental filters, electronics</p>
<p><b>WM Healthcare Solutions, Inc.</b>  Houston, TX  866-684-9048  <a href="http://medwaste.wm.com">medwaste.wm.com</a></p>	<p>sharps, red bag medical</p>

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