



March 28, 2008

All Postmasters, Station and Branch Managers  
Bay-Valley District

Subject: Storage and Recycling of Universal Waste Lamps, Batteries, Aerosols and eWaste

Used mercury containing lamps (e.g. fluorescent), dry cell batteries (consumer batteries such as AAA, AA, C, D etc.), non-empty aerosol cans, monitors, TVs and other eWaste are regulated as hazardous waste and must be managed under the Universal Waste recycling regulations.

***Universal Waste (UW) must not be disposed in the trash. UW must be accumulated as required below and must be shipped using a qualified universal waste recycling resource. A list for locating recycling resources may be found on page 2 of this memo.***

The following provides abbreviated guidance for post office sites that generate less than 220 pounds of hazardous waste per month (known as "Conditionally Exempt Small Quantity Universal Waste Generators" - CESQUWG):

1. Lamps: accumulate in the original cardboard lamp boxes or in a vendor supplied fiber drum to prevent breakage. Containers must be kept closed to prevent breakage.
2. Dry Cell Batteries: accumulate in a closed plastic container.
3. Non-Empty Aerosol Cans: accumulate in closed metal or plastic containers. Empty aerosol cans may be recycled as scrap metal or thrown away.
4. eWaste/CRTs (monitors/TVs): recycle through the appropriate USPS department (e.g. IS) if postal equipment, or, a qualified recycler if a TV or other non-postal product.
5. Recycle all universal waste only through a qualified UW recycler (see attached resource list). Postal eWaste and CRTs (monitors) are recycled as required by the USPS.
6. Other: Formal training, recordkeeping and accumulation period time limit requirements are exempted for CESQUWGs.

Please see page 2 for resource information. If there are questions, please contact me at [greg.b.russell@usps.gov](mailto:greg.b.russell@usps.gov) or 510-874-8527.

/s/  
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cc: Kim Fernandez, District Manager, Bay-Valley District

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## RESOURCES:

A. <http://www.ciwmb.ca.gov/HHW/Directory/default.aspx>

1. Access the CA Integrated Waste Management Board site and scroll down to the county listing.
2. Select the county and review the site for waste types, contact info., map and other information.
3. Contact the drop off/recycle site to confirm process before taking the waste for recycling.

B. <http://earth911.org>

1. Click on the "what? batteries, paint, more" right small down arrow at the bottom of the top center green info box.
2. Click on the waste type to be recycled (example "fluorescent bulbs" shown in the bottom left column). The type of waste will then show in the top left text box.
3. Type in the local zip code in the right text box (still in the green info box) and select "GO".
4. Search the list of sites that accept the waste type. Call the location to confirm process before taking the waste for recycling.

C. <http://www.rbrc.org/call2recycle/>

1. The Rechargeable Battery Recycling Corporation site is for identifying locations for free drop off of used rechargeable batteries and cell phones.
2. Access the site and select "Find a drop off site".
3. If no sites are listed, the bottom of the page lists stores that are drop off points (e.g. Home Depot etc.).
4. If a location is not within an appropriate distance, access the "Contact" page and request assistance from the RBRC.

D. Safety Kleen

1. Safety-Kleen is a pay for service vendor with services that require access through eBay.
2. Use the table below to access the eBay numbers required for lamps and batteries.
3. Follow the normal eBay process.

| Universal Waste Type           | Container | eBuy Part # | Safety-Kleen Part # | Price          |
|--------------------------------|-----------|-------------|---------------------|----------------|
| 4 Foot Fluorescent Lamps       | Lamp Box  | #1105456    | #3206               | \$ 28/Box      |
| 8 Foot Fluorescent Lamps       | Lamp Box  | #1105470    | #3207               | \$ 55/Box      |
| Alkaline Dry Cell Batteries    | 5 gallon  | #1101558    | #875943             | \$ 52.80/Pail  |
| Lithium Ion Dry Cell Batteries | 5 Gallon  | #1101737    | #875983             | \$ 114/Pail    |
| NiCad Dry Cell Batteries       | 5 Gallon  | #1100341    | #876063             | \$ 154.17/Pail |

Other universal waste recycle vendors may also be available through eBay; check price for best value.

NOTE: These web based resources have been selected for universal waste management. However, sites with old paint and other products that require disposal (to keep them out of the landfill) should use these websites to identify appropriate no cost hazardous waste disposal options. If none are available, Safety-Kleen is the mandated commercial pay-for-service hazardous waste disposal vendor for the USPS. eBay includes a list of their services.

Local city or county hazardous waste collection centers are also a hazardous waste disposal option if permitted by the local collection center. <http://www.ciwmb.ca.gov/HHW/Directory/default.aspx>

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proves these sites, plus, phone numbers are usually located in the government pages of the phone book. If issues arise, call Area Environmental Specialist Greg Russell at 510-874-8527.