



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 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”. 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.

A Potential Solution

There are many 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 medical wastes must have and implement an onsite medical waste management plan that is appropriate for their particular facility and the types of wastes generated. 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. If the collection container is not pre-printed with this label, you are responsible for ensuring the container is properly labeled. And although specific training requirements may be limited, it is good business practice to ensure that all staff that handle these wastes be trained on how to utilize 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 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.colorado.gov/cdphe/hm
E-mail: comments.hmwmd@state.co.us

Mail-back Recycling Kits

February 2017

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.

AERC Recycling Solutions Allentown, PA 866-447-5177 http://www.aerc.com/RecycleKits/	Lamps, CFLs, non-PCB ballasts, batteries, amalgam, mercury-containing devices, e-waste (RecycleKits)
Air Cycle Corporation Lisle, IL 888-640-6700 www.lamprecycling.com	Lamps, CFLs, non-PCB ballasts, batteries, e-waste, mercury thermostats (EasyPak)
Amalgaway Mail Disposal Service Indianapolis, IN 800-267-1467 www.amalgaway.com	Amalgam, lead foil
Bethlehem Apparatus Co. Inc. Hellertown, PA 610-838-7034 www.bethlehemapparatus.com	Lamps, CFLs, batteries, mercury devices, amalgam, mercury-contaminated solids/liquids, mercury salts and compounds; large quantity shipping containers
Big Green Box Anaheim, CA 877-461-2345 www.biggreenbox.com	Batteries, electronics
Complete Recycling Solutions, LLC Fall River, MA 866-277-9797 www.crsrecycle.com	Lamps, CFLs, non-PCB ballasts, rechargeable batteries, mercury devices (CRS-PAK)
DRNA (Dental Recycling North America) New York, NY 800-360-1001 www.drna.com	Amalgam, lead foil, fixer, sharps, red bag medical waste, pharmaceuticals
EcoLights Seattle, WA 888-214-2327 www.ecolights.com	Lamps, CFLs, non-PCB ballasts, mercury devices, e-waste, batteries
EverLights Chicago, IL 877-934-9873 http://www.everlights.com/	Lamps, CFLs, ballasts, batteries, mercury devices
Fluorecycle, Inc. Ingleside, IL 815-363-4411 www.fluorecycle.com/cartonprogram.php	Lamps, CFLs, non-PCB ballasts, batteries, thermostats, e-waste

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.

Grainger Locations in Colorado 800-472-4643 www.grainger.com	Lamps, CFLs, ballasts, batteries, mercury devices, e-waste, pharmaceuticals (RecyclePak)
GRP & Associates Clear Lake, IA 800-207-0976 www.sharpsdisposal.com	Sharps, red bag medical
Green Lights Recycling, Inc. Blaine, MN 763-785-0456 www.glrnow.com/glr-express-lamp-pak-order-form/	Lamps (Express Lamp-Pak)
HCS (Healthcare Compliance Service) Palm Bay, FL 888-726-8505 www.hcstoday.com	Amalgam, lead foil, fixer, sharps, red bag medical
Lampmaster Mason, MI 888-470-4835 www.lampmaster.com	Lamps, CFLs, non-PCB ballasts, batteries, e-waste (Lampmaster, Pailmaster)
Lighting Resources LLC Phoenix, AZ (Rocky Mountain region) 800-866-6818 www.lightingresourcesinc.com	Lamps, CFLs, non-PCB ballasts, batteries, mercury devices, e-waste, smoke detectors, tritium signs (EZ on the Earth program)
Maguire Refining, Inc Minneapolis, MN 800-486-2858 www.maquireref.com	Amalgam, amalgam sludge, separator filters, lead foil, lead aprons, film
Medasend Biomedical Long Beach, CA 800-200-3581 www.medasend.com	Mercury devices, amalgam, separator filters, lead foil, sharps, red bag medical
Medpro Waste Disposal Naperville, IL 888-641-8131 www.medprodisposal.com	Red bag medical, sharps, pharmaceutical
Mercury Technologies of Minnesota Pine City, MN 800-864-3821 www.mercurytechnologies-mn.com	Lamps, CFLs, batteries, small electronics
NLR, Inc./Bak-Pak East Windsor, CT 888-657-5267 www.go-bak.com	Lamps, CFLs, non-PCB ballasts, batteries
Office Depot locations in Colorado 800-463-3768 www.officedepot.com	Lamps, CFLs, batteries (RecyclePak) e-waste (Tech Recycling Services) Purchase in-store or online

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Recycle Technologies, Inc. Milwaukee, WI 800-305-3040 Minneapolis, MN 800-969-5166 www.recycletechnologies.com	Lamps, CFLs (SimplePac)
Republic Services, Inc. Phoenix, AZ 855-737-7871 http://www.republicsharps.com/	Sharps
Sharps Assure Lakewood, NJ 855-974-2777 www.sharpsassure.com	Sharps, amalgam, lead foil
Sharps Compliance, Inc. Houston, TX 800-772-5657 www.sharpsinc.com	Lamps, CFLs, non-PCB ballasts, batteries, mercury devices, amalgam, amalgam sludge, lead foil, lead aprons, film, sharps, red bag medical, pharmaceutical
Stericycle, Inc. Northbrook, IL 800-355-8773 http://www.stericycle.com/compliance/stericycle-product-portfolio/mailback-kits-and-solutions/	Mercury devices, amalgam, sharps, red bag medical
Veolia Environmental Services Greenville, WI 888-669-9725 http://lamprecycling.veoliaes.com/	Lamps, CFLs, ballasts, batteries, mercury devices, e-waste, amalgam, separator filter, lead foil, fixer, sharps, red bag medical, pharmaceutical
Waste Management Minneapolis, MN 800-664-1434 www.wmlamptracker.com	Lamps, CFLs, non-PCB ballasts, batteries, mercury devices, e-waste, aerosol cans, amalgam, separator filters, lead foil, sharps, red bag medical

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