

<u>SUBJECT</u>		<u>DATE</u>
1448.	Definitions of Inactive Portion, Active Portion and Closed Portion of a RCRA TSDF	AUG 12, 2021
1449.	Dangerous Waste Designations and Dangerous Waste Code Determinations	AUG 19, 2021
1450.	Method Detection Limits and Hazardous Waste Determinations	ENCORE AUG 26, 2021
1451.	Method Detection Limits and Hazardous Waste Determinations II	ENCORE SEP 2, 2021
1452.	Totals Analysis vs. TCLP and Dividing by 20	ENCORE SEP 9, 2021
1453.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE SEP 16, 2021
1454.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE SEP 23, 2021
1455.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE SEP 30, 2021
1456.	The "Derived from Rule", the "Mixtures Rule", and the "Contained-In Policy"	ENCORE OCT 7, 2021
1457.	Hazardous Debris and Options to Exclude as a Dangerous Waste	OCT 14, 2021
1458.	Regulatory Status of Characteristic Baghouse Dust Destined for Reclamation	OCT 21, 2021
1459.	RCRA Point of Generation and Baghouse Dust Collection Systems	OCT 28, 2021
1460.	Pumps Containing Liquid Hazardous Wastes and Liquids in Landfill Prohibition	ENCORE NOV 4, 2021
1461.	Pumps Containing Liquid Hazardous Waste and Land Disposal Restrictions	ENCORE NOV 11, 2021
1462.	Pumps Containing Liquid Hazardous Wastes and RCRA Empty Containers	NOV 18, 2021
1463.	Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents	ENCORE NOV 23, 2021
1464.	LDR Notifications/Certifications and Generator Permitted Treatment, Storage, or Disposal Facility	ENCORE DEC 2, 2021
1465.	Multiple Characteristic and Listed Hazardous Waste Codes and the "in lieu of" LDR Principle	ENCORE DEC 9, 2021
1466.	Universal Wastes - Recycling versus Disposal	ENCORE DEC 16, 2021

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TWO MINUTE TRAINING

TO: CENTRAL PLATEAU CLEANUP COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert
CPCCo Environmental Protection, Hanford, WA

SUBJECT: UNIVERSAL WASTES - RECYCLING VERSUS DISPOSAL

DATE: DECEMBER 16, 2021

<u>CPCCo Projects</u>	<u>CPCCo Functionals</u>	<u>HMIS</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
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TWO MINUTE TRAINING

SUBJECT: Universal Wastes - Recycling versus Disposal

Q: Since the purpose of the universal waste regulations is to encourage recycling, does this mean that hazardous wastes such as lithium batteries destined for disposal are not eligible for management as universal wastes?

A: Per the [May 11, 1995, Federal Register](#) beginning on page 25502, it states:

“Although limiting the [universal waste] regulations to recycled wastes might encourage recycling, which the Agency supports, the Agency explained that at the time it believed that not limiting the regulations was the best option for a number of reasons”.

Some of the reasons for allowing recycling and disposal options for universal wastes included:

1. Regulations allowing both recycling and disposal are less complex and more user friendly thus encouraging participation in the universal waste collection programs.
2. Regulations limited to only recycling would have resulted in regulations based upon the “intent” of a person to do something in the future. Enforcement by the Agency based upon the generator’s intent would have been difficult.
3. Regulations limited to only recycling would also have forced generators to choose between streamlined regulations for recycling or full regulation for disposal. If at a later time it was determined that recycling was not available for collected wastes, the generators would then be vulnerable to full regulation for disposal, e.g., for exceeding the ≤90-day accumulation limit. This might have discouraged recycling.
4. Regulations limited to only recycling might have provided a greater incentive for “sham recycling” rather than legitimate recycling, and;
5. The land disposal restrictions for certain batteries such as lead-acid, cadmium containing, and high mercury, specifically require recycling as the LDR treatment standard. Even if destined for disposal these batteries are subject to recycling requirements prior to land disposal.

Based upon these reasons the universal waste rules were promulgated to include both recycling and disposal.

SUMMARY:

- Dangerous and hazardous wastes such as batteries destined for recycling or disposal are eligible for the universal waste program.
- EPA cited several reasons justifying both recycling and disposal as options for universal wastes.
- Even though disposal is an option, the intent of the universal waste rules remains to encourage recycling.

Nothing is attached to the e-mail. If you have any questions, contact me at [Paul W Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 12/16/2021

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