Recycling Options Available on DRMS Hazardous Waste Contracts

In the environmental arena, recycling is considered disposition of material without depositing it into the land, air, or water. DRMS encourages recycling to meet requirements of waste minimization programs, support Environmental Management Systems, reduce the environmental impact of DOD operations and to reduce potential government liability. Many HM/HW generators request and use recycling HIN(s) available on DRMS hazardous waste contracts to obtain waste minimization credit. Items disposed of using normal hazardous waste disposal HIN(s) may be recycled at the contractors discretion; use of uniquely suffixed HIN(s) makes recycling mandatory.

Standard recycling HIN(s) are available to generators to help recycle commodity specific items and are identified by uniquely suffixed HIN(s) such as various types of batteries (suffixes of AB, LA, NC, LL, MB, MG and NH), solvents (SD), antifreeze (AF), fluorescent tubes and High-Density Discharge (HID) lamps (FT), latex paint (LP), oil filters (9902FA), empty aerosol cans (EA), fixer/developer solution (DS), plastic and metal drums (EC) and copper etching solution (CE).

Generators with unique waste streams that might be recyclable may request the addition of a specially suffixed recycling HIN(s) for their waste stream during the identification of requirements when new contracts are being created and as a modification to existing contracts. Identification of unique recycling requirements when new contracts are under development may lead to the most competitive pricing.

If a contract HIN suffixed for recycling is not available for a particular waste stream that a generator wants recycled, they may request the identification of such a HIN in their new contract or as a modification to an existing hazardous waste contract. Generators should be aware that certain contractual limitations may apply to the use of recycling HIN(s) such as a minimum requirement for 200lb per Task Order (TO) line number or another amount established for a specific contract/HIN.

The ability to provide a recycling HIN for a unique waste stream is not guaranteed and may vary by location, availability of approved recycling facilities, estimated size of a waste stream, current market conditions and technical capability to recycle a waste stream.

Some examples of unique waste streams that DRMS has provided recycling HIN(s) for at the request of generators include: various types of blast bead media, Oily rags/pads and Paint (other than latex).

Note: What qualifies for waste minimization credit varies somewhat from state to state as they interpret the basic EPA exemptions. Generators need to confer with their regulator to determine if any items recycled using special HIN(s) will qualify for waste minimization credit.