

# Management Instruction

## Integrated Waste Management

This management instruction (MI) establishes Postal Service™ policies and requirements to facilitate the safe and environmentally sound management and disposal of waste, including hazardous and regulated waste.

### Policy

In its continuing commitment to provide its customers, employees, suppliers, and communities with a safe and healthy environment, the Postal Service will do the following:

1. Comply with all applicable federal, state, and local environmental laws and regulations pertaining to waste management while fostering the sustainable use of natural resources.
2. Seek practical and cost-effective ways to integrate pollution prevention into its business practices in order to minimize or eliminate the generation of all waste, including hazardous and regulated waste.

### Scope


This MI applies to all Postal Service employees, suppliers, programs, projects, products, and services.

### Regulatory Requirements

#### Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), 42 United States Code (U.S.C.) 6901 *et seq.* (1976), mandates a cradle-to-grave system that tracks hazardous and regulated waste, including universal waste, from generation through its ultimate disposal. RCRA also establishes requirements for the proper management, storage, and disposal of non-hazardous wastes and used oil. The U.S. Environmental Protection Agency (EPA) administers RCRA. However, EPA has authorized many states to administer the program themselves, and most have adopted more stringent standards. The Postal Service's

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failure to comply with RCRA or its state-equivalent regulations can result in significant civil and individual criminal penalties, including fines and imprisonment.

### **Comprehensive Environmental Response, Compensation, and Liability Act**

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund), 42 U.S.C 9601 *et seq.* (1980), imposes liability for the cost of cleanup on any and all parties responsible for the release of hazardous substances. Under CERCLA, the Postal Service remains legally responsible for the proper management of waste — even after the waste leaves Postal Service property.

### **Federal Insecticide, Fungicide, and Rodenticide Act**

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. 136 *et seq.* (1996), imposes precise requirements for the use, storage, transportation, and disposal of general use and restricted use pesticides. The Act establishes requirements for certifying applicators and issuing permits for the use of regulated chemicals. FIFRA also authorizes measures of enforcement.

### **Toxic Substances Control Act**

The Toxic Substances Control Act (TSCA), 15 U.S.C. 2601 *et seq.* (1976), gives EPA the authority to control and require information on the manufacture, import, and disposal of toxic chemicals that may present a danger to human health or the environment. The Postal Service must properly dispose of waste materials containing lead (e.g., paint), asbestos (e.g., floor tiles and insulation), and polychlorinated biphenyls (e.g., electrical equipment, including lighting ballasts, capacitors, transformers, and certain used oils) in compliance with TSCA.

### **State and Local Regulations**

In many instances, state and local regulations authorized under these federal laws present complex compliance requirements that can vary geographically. In addition, states, cities, municipalities, and counties may enact their own environmental laws and regulations.

## Other Laws and Executive Orders

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The Postal Service will implement policies based on the laws and executive orders outlined below when it is in the best interest of the Postal Service.

### **Pollution Prevention Act of 1990**

The Pollution Prevention Act of 1990, 42 U.S.C. 13101 and 13102, *et seq.* (1990), establishes a federal policy that pollution should be prevented, reduced, or eliminated at the source whenever possible. The Act promotes total resource management through environmentally preferable purchasing and process modifications.

### **Executive Order 13423**

Executive Order 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* requires federal agencies to conduct their environmental, transportation and energy related activities in an environmentally, economically, and fiscally sound, integrated, continuously improving, efficient, and sustainable manner. With regards to integrated waste management, federal agencies are required to:

1. Establish affirmative procurement programs for environmentally preferable products and services, and
2. Track and report purchases of these products and services, and
3. Develop and maintain pollution prevention programs.

## Objectives

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The Postal Service is legally and socially responsible for the safe management of its waste — including hazardous and regulated waste — from the point of generation through final disposition. The main objectives of the Postal Service's integrated waste management program are to identify, develop, and implement procedures that will:

1. Meet all legal mandates for the management of waste, including hazardous and regulated waste.
2. Reduce, or where feasible eliminate, the procurement, use, and offering of products containing potentially toxic and hazardous materials, including those on the Postal Service Targeted Chemicals list available on the Postal Service Safety and Environmental Performance Management Web site.
3. Reduce the amount of energy consumed by the Postal Service.
4. Reduce the amount of waste generated at the source by modifying processes and procurement practices.
5. Reduce the costs associated with waste management.

6. Continue and expand the reuse and recycling of waste generated by the Postal Service.
7. Ensure that all waste generated by the Postal Service — including hazardous and regulated waste — is managed in a way that protects human health and the environment.
8. Sustain Postal Service accomplishments in preventing pollution.
9. Continue to find innovative and cost-effective ways to reduce and eliminate waste.

By implementing a comprehensive integrated waste management program, the Postal Service will reduce pollution, exposure to liabilities (fines and lawsuits), administrative paperwork, and expenses. The Postal Service will also create a safer and healthier work environment for its employees.

## Implementation

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### Pollution Prevention

The Postal Service is committed to pollution prevention (P2), which refers to a variety of practices designed to reduce pollution at the source and minimize the creation of waste. P2 is the foundation of a successful integrated waste management program. A well-designed and well-managed P2 program will reduce:

1. Regulatory reporting and waste management requirements.
2. Costs of compliance, waste disposal, energy, and production.
3. Environmental liability.

A well-managed P2 program will also lead to an improved environment and a safer and healthier working environment.

The P2 practices adopted by the Postal Service to more effectively manage waste are presented as follows in priority order:

- |                                 |                 |
|---------------------------------|-----------------|
| 1. Source Reduction             | Most Preferred  |
| 2. Waste Minimization           | ↑               |
| 3. Waste Management             | ↓               |
| 4. Waste Treatment and Disposal | Least Preferred |

Each Postal Service facility must develop and implement a P2 plan that addresses these practices. Select a P2 practice based on the following:

1. Processes and needs of the facility.
2. Types of waste generated.
3. Life-cycle costs from acquisition through disposal.

Contact your area environmental specialist for assistance in developing a P2 plan and to learn about voluntary leadership programs, such as EPA's WasteWise and National Performance Track Programs that provide free assistance and information. For more information, see EPA's Web site at: [www.epa.gov](http://www.epa.gov).

## **Source Reduction**

Source reduction activities, which prevent waste and pollution from being generated, include the following:

1. Environmentally preferable purchasing.
2. Inventory management.
3. Process modification.

## **Environmentally Preferable Purchasing**

### **General**

Environmentally preferable purchasing, an effective means to prevent pollution from being generated, is a preferred policy under Executive Order 13423. When making purchasing decisions, Supply Management should consider the environmental impacts of products in addition to traditional factors, such as price, performance, and safety. Installation heads and supervisors at facilities with local buying authority should consider environmental impacts and, when appropriate, purchase and use environmentally preferable products.

Environmentally preferable products are those that pose a reduced threat to human health and the environment when compared with competing products or services that serve the same purpose. Examples include products that:

1. Are made from recycled materials.
2. Have received third party, environmentally preferable certification (e.g., Green Seal).
3. Do not contain any chemicals shown on the Postal Service Targeted Chemicals list available on the Postal Service Safety and Environmental Performance Management Web site.
4. Are energy efficient (e.g., Energy Star qualified products) and use minimal packaging.

Examples of common environmentally preferable products used at Postal Service facilities include low-mercury lamps, retread tires, recycled antifreeze, re-refined oil, paper with recycled content, and less toxic and hazardous cleaning solvents.

**Note:** Products containing Postal Service Targeted Chemicals available through eBUY catalogs should be reported to Supply Management through the Contracting Officer who handles the supplier or service contract.

### **Building Design and Construction**

To ensure the sustainability of Postal Service facilities, always consider environmentally preferable products during the design and construction process. Postal Service Building Design Standards (available through the Facilities organization) include many environmentally preferable building materials and design criteria. Examples include energy efficient windows and roof shingles and products that contain recycled plastic, such as insulation, rubber-modified asphalt, lumber, and carpets.

### **Integrated Pest Management**

The Postal Service will implement pest control practices that minimize risk to human health and the environment, reduce the need for pesticide applications, reduce pest resistance to pesticides, and minimize pesticide wastes. Integrated pest management presents a unique opportunity to implement P2 practices, including environmentally preferable purchasing. For further information about contracts for integrated pest management, contact your area environmental specialist and district purchasing personnel.

Always observe the following principles of integrated pest management:

1. Consider the environmental impacts of any means of pest control.
2. Select the safest and most cost-effective products available.
3. Before using a pesticide, find out if an environmentally preferable, nonchemical, pest-control method is feasible.
4. When you must use a pesticide, apply it with precision and restraint.

### **Inventory Management**

Maintaining excess inventory increases the potential for waste generation. Materials stored too long become obsolete or their shelf life expires; these materials become waste that must be disposed of. In addition, the money spent on excess inventory is not available to purchase other products.

Analyze inventory data to identify source reduction measures and evaluate P2 programs. (See Handbook AS-701, *Material Management*, for Postal Service inventory management policy.)

### **Process Modification**

To conserve energy and reduce waste generation at the source, modify processes and equipment or purchase new equipment. Facilities can reduce pollution by upgrading old equipment or revising methods of operation to enhance the use of non-hazardous, less hazardous, or fewer raw materials. Process modifications that significantly reduce the amount of waste generated are described below:

1. Use high-volume, low-pressure (HVLP) or low-volume, low-pressure (LVLP) spray paint guns or eliminate spray painting to reduce fugitive air emissions and waste generated during painting.

2. Improve address hygiene and develop better sorting and distribution systems, such as the Postal Automated Redirection System (PARS), to reduce the amount of undeliverable standard mail (USM).
3. Use integrated pest management principles, such as upgrading sanitation systems and repairing facility structural deficiencies to reduce hiding places and points of entry, control pests, and eliminate the need for pesticides.

## **Waste Minimization**

Waste minimization practices, such as reusing and recycling, minimize the amount of material classified as waste.

## **Recycling and Reuse**

When an item is recycled or reused, it does not enter the waste stream. The practice of reusing and recycling thus reduces the amount of material classified as waste. Benefits include lower waste management and operating costs, reduced labor hours, and less potential for liability under CERCLA and other federal, state, and local environmental regulations.

Recycling is not always voluntary; it may be required by federal, state, and local recycling mandates. The decision to recycle must also be based on sound business practices, such as cost avoidance, revenue-producing opportunities, logistical and transportation constraints, and the market for recycled materials.

Recycling and reuse opportunities include the following:

1. All Postal Service facilities should:
  - a. Recycle mixed paper, cardboard, metals, plastics, and electronic equipment and associated components (printer inkjet and toner cartridges).
  - b. Recycle fluorescent lamps and batteries, which are hazardous wastes, in accordance with the more lenient universal waste provisions. (Contact your area environmental specialist for specific requirements in your location.)
2. Plants and Post Offices™ should recycle USM and discarded lobby mail (DLM).
3. Vehicle maintenance facilities should recycle used oil, antifreeze, batteries, scrap metal, and tires.

Enter into contracts to recycle and reuse waste materials only with properly licensed and reputable companies. Contact your district purchasing personnel for information about regional contracts that may have been established for reuse and recycling of non-hazardous waste, such as USM. Contact your area environmental specialist for information about recycling opportunities for hazardous and regulated waste.

## **Undeliverable Standard Mail and Discarded Lobby Mail**

Approximately one-third of Postal Service revenue comes from standard mail. Reusing or recycling this mail helps to protect the value of this form of advertising and reduces disposal costs. In addition, the Postal Service generates millions of dollars of revenue each year by selling this waste to paper mills and brokers. USM and DLM can be recycled into materials such as:

1. Low-grade paper products such as hand towels and tablet backing.
2. Wallboard.
3. Fuel pellets that can be burned with coal to reduce harmful air emissions.

District managers and installation heads are encouraged to establish recycling and backhauling programs to collect USM and DLM in central locations and use labor hours judiciously to handle this material properly.

## **Waste Management**

Improper management of waste can damage water sources and threaten human health. Always use proper storage, maintenance, and good housekeeping procedures in areas designated for waste management.

### **Proper Waste Management**

Requirements for proper waste management include the following:

1. Keep facility grounds clean; close and cover waste receptacles (such as garbage cans and dumpsters).
2. Store wastes generated by employees (food waste, paper towels, napkins, and wrappers) in closed containers that are nonabsorbent, leak proof, durable, easily cleaned, and designed for safe handling.
3. Store sharps and other regulated medical waste in properly labeled and maintained containers.
4. Comply with state and local requirements for waste dumpsters, which may vary by locality (for example, in certain areas dumpsters must be covered and cannot be exposed to the elements).
5. Use waste compactors and devices that monitor dumpster fullness whenever possible to minimize the frequency of waste pickups and associated costs.
6. Arrange to have waste picked up as needed instead of on a regular schedule to save money and lessen the environmental impact of pickups.



## **Managing Hazardous and Regulated Waste**

### **General**

Facilities that generate hazardous and regulated waste are subject to stringent waste management requirements, including those discussed below.

1. Comply with strict waste determination and management requirements imposed by federal, state, and local regulations.
2. Implement P2 practices to minimize the quantity of hazardous and regulated waste generated and reduce the facility's generator status and regulatory obligations.
3. Take advantage of universal waste regulatory provisions, which offer less-stringent, streamlined management requirements for specific types of hazardous wastes, whenever possible.

See Attachment 1, Hazardous Waste and Universal Waste Summary Tables, for information about monthly generation rates for the three categories of federal hazardous waste generators and the two categories of federal universal waste handlers. State generator categories may vary.

### **Identifying Hazardous and Regulated Waste**

To identify hazardous and regulated waste:

1. Be aware of every operation that generates hazardous or regulated waste.
2. Determine if any of the facility's waste is hazardous or regulated (through testing or user knowledge). If so, calculate the amount generated per calendar month and how much is stored on-site.
3. Track hazardous and regulated waste monthly to verify and document generator status.

Contact your area environmental specialist for assistance with waste determination and tracking procedures.

### **Storing Hazardous and Regulated Waste**

Postal Service facilities that generate and store hazardous and regulated waste must observe proper maintenance and good housekeeping procedures, including the following:

1. Store hazardous and regulated waste in compatible, approved containers or tanks that are in good condition and labeled properly.
2. Ensure that time limits for quantity and accumulation are not exceeded. These limits may differ according to a facility's generator status, state, and location.

See Attachment 1 for a summary of federal hazardous waste generator and universal waste handler requirements.

## **Spills, Releases, and Other Emergencies**

Postal Service facilities and equipment must be maintained and operated to minimize the possibility of leaks, fires, explosions, and other unplanned releases of hazardous waste, regulated waste, or hazardous constituents.

To minimize and properly manage spills, releases, and other emergencies, comply with the following requirements:

1. Develop facility-specific standard operating procedures (SOPs) and a facility emergency action plan (EAP). (See MI EL-810-2006-3, *Response to Hazardous Materials Releases*.)
2. Notify all appropriate authorities if a spill, release, or other emergency occurs.
3. Ensure that expert help is available for assistance in case of a spill, release, or other emergency.
4. Follow the facility's SOPs and EAP and comply with the facility's integrated emergency management plan, as appropriate.
5. Use properly licensed contractors for all activities related to hazardous and regulated waste remediation and response.
6. Ensure that corrective action is taken when hazardous or regulated wastes are released.

## **Waste Treatment and Disposal**

### **General**

When all options have been evaluated and it is not possible to recycle or reuse waste materials, then the least preferred waste management strategy — treatment and disposal — may be necessary. Disposal is the only option for some waste streams.

When treating and disposing of waste, observe the following requirements:

1. Never dispose of waste, including hazardous or regulated waste, on Postal Service property.
2. Never allow improper disposal of any waste materials.
3. Select reputable waste management companies and haulers that have proper credentials.

Contact area environmental specialists and district purchasing personnel for information about regional contracts for waste treatment and disposal, including contracts for hauling garbage and recycling USM.

## Hazardous and Regulated Waste

Facilities that manage hazardous and regulated waste must adhere to specific standards for treatment and disposal. Requirements include the following:

1. Label, mark, and manifest properly all off-site shipments of hazardous and regulated waste according to EPA and Department of Transportation requirements.
2. Select reputable waste transporters and treatment and disposal facilities that are authorized or licensed by EPA or the appropriate state authority. Verify periodically that the facilities are managing hazardous and regulated waste generated by the Postal Service properly.
3. Confirm the delivery of every shipment of hazardous and regulated waste to a designated treatment or disposal facility.

**Note:** Installation heads may be liable for mismanagement of hazardous and regulated waste after the waste leaves a Postal Service facility.

Contact area environmental specialists and district purchasing personnel for further information about contracts for management of hazardous and regulated waste, including contracts for transportation and disposal of such waste and response to hazardous releases.

## Training

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### Sources

The Postal Service National Center for Employee Development (NCED) has developed several courses that address pollution prevention and waste management.

The following Web sites provide information on courses and enrollment options:

- NCED <http://nced.usps.gov>
- Automated Enrollment System <https://aes.usps.gov>
- National Training Database <http://blue.usps.gov/hrisp/hris/ntdb>

Contact the managers of environmental programs and area environmental specialists for information about area- and state-specific training materials and courses.

### Pollution Prevention

Pollution prevention (P2) training is encouraged, but not required. P2 practices and concepts must be integrated into all training courses dealing with processes that generate waste.

## Hazardous and Regulated Waste

Environmental laws and regulations require employees involved in any aspect of hazardous and regulated waste management to be trained properly according to their job responsibilities. The amount and type of training required may vary according to the facility's generator status. Training requirements may also vary according to state and locality.

Train employees to be familiar with:

1. Proper procedures for managing hazardous and regulated waste. Training will include instruction in how to:
  - a. Handle hazardous and regulated waste safely.
  - b. Label and mark containers.
  - c. Complete and sign EPA Form 8700-22, *Uniform Hazardous Waste Manifest*.
2. Emergency response procedures and equipment.

To document attendance, maintain environmental training records at the facility or in an easily accessible electronic format, using:

1. PS Form 2432, *Individual Training Progress Report*, and PS Form 2548, *Individual Training Record Supplemental Sheet* (when possible), or
2. Any easily accessible Postal Service training data management system, such as the National Training Database (NTD), Automated Enrollment System (AES), Electronic Maintenance Activity Reporting and Scheduling (eMARS), or Vehicle Management Accounting System (VMAS).

See Attachment 1 for additional information about federal training requirements for the three categories of federal hazardous waste generators and the two categories of federal universal waste handlers. Contact your area environmental specialist to learn more about your facility's training requirements.

## Recordkeeping

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### Pollution Prevention

Each Postal Service facility must develop a P2 plan and evaluate it annually for effectiveness and to identify additional P2 opportunities. As part of this process, facilities must track products as they:

1. Enter and are used at the facility.
2. Exit the facility (in the form of trash, hazardous and regulated waste, and recycled or reused materials).

## Hazardous and Regulated Waste

Complete and up-to-date records are required to comply with federal, state, and local hazardous and regulated waste regulations and to prepare required reports.

Recordkeeping and reporting, which vary according to generator status and by state or locality, may include the following requirements:

1. Obtain a hazardous- or regulated-waste generator identification number.
2. Submit annual or biennial waste generation and management reports, as required.
3. Develop a waste minimization plan.
4. Maintain manifests or bills of lading, land-ban restrictions, storage area inspection records, employee training records, and emergency response records for hazardous and regulated waste.

See Attachment 1 for a summary of federal hazardous waste generator and universal waste handler requirements. Consult with your area environmental specialist for a complete list of recordkeeping and reporting requirements based on state and local regulations.

## Resources

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### Postal Service

Manuals, handbooks (HBKs), and MIs are found at <http://blue.usps.gov/cpim/>.

- *Administrative Support Manual (ASM)*, Chapter 5.
- *Employee and Labor Relations Manual (ELM)* 890.
- HBK EL-812, *Hazardous Materials and Spill Response*.
- HBK RE-6, *Facilities Environmental Guide*.
- MI EL-810-2006-3, *Response to Hazardous Materials Releases*.

### Other

Code of Federal Regulations: 40 CFR 260–279 (RCRA), 700–789 (TSCA), and 300 (CERCLA), available at [www.gpoaccess.gov/cfr/index.htm](http://www.gpoaccess.gov/cfr/index.htm).

Additional information about specific waste management procedures and implementation tools is available on the Safety and Environmental Performance Management Web site.

Check with your area manager of environmental programs and area environmental specialists for area- and state-specific guidance documents.

# Roles and Responsibilities

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## Headquarters

This person or organization...	Is responsible for...
Vice President, Employee Resource Management (ERM), Human Resources (HR)	<ul style="list-style-type: none"> <li>■ Serving as the Chief Environmental Officer for the Postal Service.</li> <li>■ Communicating environmental policies, including those pertaining to integrated waste management, and allocating resources.</li> </ul>
Director, Safety and Environmental Performance Management (SEPM), ERM, HR	<ul style="list-style-type: none"> <li>■ Establishing strategic direction and overseeing the Postal Service's environmental management program, including the national integrated waste management program.</li> </ul>
Manager, Environmental Policy and Programs (EPP), SEPM, ERM, HR	<ul style="list-style-type: none"> <li>■ Developing, supporting, and overseeing the Postal Service's environmental management program, including the national integrated waste management program.</li> <li>■ Developing policies and procedures that support the national integrated waste management program.</li> <li>■ Overseeing the coordination, development, and submission of reports required by environmental laws, regulations, and executive orders, including those pertaining to integrated waste management.</li> </ul>

<b>This person or organization...</b>	<b>Is responsible for...</b>
<p>Manager, Environmental Policy and Programs (EPP), SEPM, ERM, HR (Cont'd)</p>	<ul style="list-style-type: none"> <li>■ Interacting with Operations, Finance, General Counsel, and other headquarters functions to ensure program and activity support.</li> <li>■ Serving as the Postal Service Agency Environmental Executive.</li> </ul>
<p>Vice President, Facilities</p>	<ul style="list-style-type: none"> <li>■ Ensuring that environmental polices are incorporated into all aspects of facility management, to include real estate transactions, design and construction, excessing of property, and alteration and repair activities.</li> <li>■ Directing all Facilities Service Offices to follow Postal Service environmental policies and all applicable federal, state, and local environmental laws and regulations, including those pertaining to integrated waste management, when managing projects.</li> </ul>
<p>Executive Director, National Preparedness, Inspection Service</p>	<ul style="list-style-type: none"> <li>■ Ensuring that emergency management guidance related to integrated waste management is incorporated into all aspects of Postal Service operations and activities associated with emergency responders.</li> <li>■ Providing guidance to all National Preparedness staff to follow applicable policies and all applicable federal, state, and local environmental laws and regulations when managing projects.</li> </ul>

This person or organization...	Is responsible for...
Facilities Service Offices, Facilities	<ul style="list-style-type: none"> <li>■ Following Postal Service environmental policies and all applicable federal, state, and local environmental laws and regulations, including those pertaining to integrated waste management and recordkeeping, when managing projects.</li> </ul>
Portfolio Managers, Supply Management	<ul style="list-style-type: none"> <li>■ Developing, deploying, and managing national and regional product and service contracts, including contracts for hazardous and regulated waste management, trash removal, and recycling.</li> <li>■ Ensuring that environmental policies and procedures, including those associated with the national integrated waste management program, are incorporated into all aspects of product and service contracts.</li> </ul> <p><b>Note:</b> Product and service suppliers should use and offer environmentally preferable products and must comply with Postal Service policy and all applicable laws and regulations applicable to waste management, including hazardous and regulated waste management.</p>
Chief Environmental Counsel, General Counsel	<ul style="list-style-type: none"> <li>■ Conducting legal research, monitoring laws and regulations, and issuing opinions and interpretations of environmental laws related to waste management in response to specific questions and issues.</li> </ul>



## Area Offices

This person or organization...	Is responsible for...
Vice Presidents, Area Operations	<ul style="list-style-type: none"> <li>■ Developing and implementing an area program that supports the national integrated waste management program.</li> <li>■ Working with and supporting the efforts of the area managers, Operations Support; managers, Environmental Programs; and district managers to ensure that facilities are in compliance with laws and regulations applicable to integrated waste management, including hazardous and regulated waste.</li> </ul>
Managers, Operations Support	<ul style="list-style-type: none"> <li>■ Coordinating with the area manager, Environmental Programs, on the following:               <ul style="list-style-type: none"> <li>■ Implementing an area-wide program that supports the national integrated waste management program.</li> <li>■ Preparing an area annual integrated waste management report that addresses waste management initiatives and P2 accomplishments.</li> </ul> </li> </ul>

<b>This person or organization...</b>	<b>Is responsible for...</b>
Managers, Environmental Programs	<ul style="list-style-type: none"> <li>■ Coordinating with the area managers, Operations Support, and the manager of EPP on the following: <ul style="list-style-type: none"> <li>■ Deploying, implementing, and reviewing an area program that directly supports the national integrated waste management program.</li> <li>■ Preparing an annual area integrated waste management report that addresses waste management initiatives and P2 accomplishments.</li> </ul> </li> </ul>
Environmental Specialists	<ul style="list-style-type: none"> <li>■ Implementing an area program that directly supports the national integrated waste management program.</li> <li>■ Supporting the managers, Environmental Programs, with the development and implementation of area environmental goals, initiatives, and reports that align with national integrated waste management program goals.</li> <li>■ Supporting district managers and installation heads by providing guidance on P2 practices and hazardous and regulated waste determination, management, training, and recordkeeping.</li> <li>■ Responding to inquiries from facility personnel regarding procedures mandated by federal, state, and local regulations.</li> </ul>

## Performance Clusters

This person or organization...	Is responsible for...
District Managers	<ul style="list-style-type: none"> <li>■ Providing the support and resources necessary for facilities under their jurisdiction to implement the integrated waste management program.</li> <li>■ Ensuring the timely completion of any waste-related corrective actions within their management control.</li> </ul>
Installation Heads, Middle Level Managers, and Supervisors	<p><b>General</b></p> <ul style="list-style-type: none"> <li>■ Ensuring facility compliance with Postal Service policy and environmental laws and regulations, including those pertaining to hazardous and regulated waste.</li> </ul> <p><b>Pollution Prevention (P2)</b></p> <ul style="list-style-type: none"> <li>■ Developing and implementing P2 plans and practices based on individual facility processes and needs and using P2 tracking tools. Vehicle maintenance facility heads should use the P2 tracking tools required by the Postal Service Model Audit Program (section 6-301).</li> </ul>

<b>This person or organization...</b>	<b>Is responsible for...</b>
Installation Heads, Middle Level Managers, and Supervisors (Cont'd)	<p data-bbox="1000 264 1328 323"><b>Hazardous and Regulated Waste Management</b></p> <ul style="list-style-type: none"> <li data-bbox="1000 333 1409 499">■ Determining what waste, if any, is hazardous or regulated; the amount generated per calendar month; and how much is stored on-site.</li> <li data-bbox="1000 520 1409 751">■ Tracking hazardous and regulated waste generated on-site monthly to verify and document generator status; assigning qualified and trained personnel to manage such waste.</li> <li data-bbox="1000 772 1409 1003">■ Ensuring that hazardous and regulated wastes are stored in approved containers or tanks, that storage time limits are not exceeded, and that such waste is properly treated and disposed of.</li> <li data-bbox="1000 1024 1409 1150">■ Being prepared for emergencies and following facility SOPs and EAPs, as applicable.</li> <li data-bbox="1000 1171 1409 1402">■ Using properly licensed suppliers for all hazardous and regulated waste response and remediation activities and ensuring corrective action when hazardous or regulated wastes are released.</li> <li data-bbox="1000 1423 1409 1724">■ Selecting reputable waste transporters and treatment and disposal facilities authorized or licensed by EPA or the appropriate state authority; verifying periodically that such facilities are managing waste generated by the Postal Service properly.</li> </ul>

<b>This person or organization...</b>	<b>Is responsible for...</b>
Installation Heads, Middle Level Managers, and Supervisors (Cont'd)	<p><b>Training</b></p> <ul style="list-style-type: none"> <li>■ Ensuring that facility personnel with hazardous and regulated waste management responsibilities are trained properly and that such training is documented in staff files.</li> <li>■ Maintaining training records using PS Forms 2432 and 2548 when possible, a Postal Service training data management system, or both.</li> </ul> <p><b>Recordkeeping</b></p> <ul style="list-style-type: none"> <li>■ Tracking products as they enter the facility during the year and recording how they exit as part of the facility's P2 plan.</li> <li>■ Keeping complete and up-to-date records that document the proper management of hazardous and regulated waste.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>■ Complying with Postal Service policy and applicable federal, state, and local environmental laws and regulations, including those pertaining to integrated waste management, in the conduct of their duties for the Postal Service.</li> <li>■ Implementing P2 practices whenever possible.</li> </ul>

## Definitions

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**Environmentally preferable products.** Products that have a lesser or reduced toxicity effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider the acquisition of raw materials as well as the production, manufacturing, packaging, distribution, reuse, operation, maintenance, or disposal of the product or service. For example, using a biodegradable solvent is environmentally preferable to using a toxic solvent. The Postal Service considers an environmentally preferable product to be one that is made from recycled materials, has received a third-party environmentally preferable certification (e.g., Green Seal), does not contain any of the Postal Service Targeted Chemicals, is energy efficient (e.g., Energy Star qualified products), and uses minimal packaging.

**Generator.** A person, company, facility, site, or mobile source that produces a waste.

**Generator status.** Determined by the type of hazardous waste generated at a facility, the rate at which the facility generates it, and the amount that is accumulated on-site. The federal RCRA program recognizes three categories of hazardous waste generators: large-quantity, small-quantity, and conditionally exempt small-quantity. The universal waste program under RCRA regulations recognizes two categories of universal waste handlers: large-quantity and small-quantity. See Attachment 1 for additional information about federal categories for generators. State categories for generators may vary.

**Hazardous waste.** Waste that can pose a hazard, or a potential hazard, to human health or the environment when managed improperly. RCRA regulations characterize a waste as hazardous if it possesses a hazardous characteristic (ignitability, corrosivity, reactivity, or toxicity) or if EPA lists it as a hazardous waste. Cleaning solvents, inks, paints, and pesticides are examples of waste that could be considered hazardous.

**Integrated pest management.** The use of appropriate technology and management practices to bring about pest prevention and suppression in a cost-effective, environmentally sound manner.

**Integrated waste management.** A cradle-to-grave approach that addresses the entire life cycle of a product and recognizes the economic and environmental impacts of each stage. Life-cycle stages include processing raw materials, manufacturing, using, reusing or recycling, and managing and disposing of waste. Integrated waste management focuses on P2 activities, including source reduction and waste minimization.

**Pesticide.** Any substance or mixture of substances intended to:

1. Prevent, destroy, repel, or mitigate any pest.
2. Be used as a plant regulator, defoliant, or desiccant.

**Pollution prevention (P2).** The use of materials, processes, or practices that reduce or eliminate the creation of pollutants or wastes. Product substitution and process changes that reduce the use of hazardous materials, energy, water, or other resources and protect natural resources through conservation are examples of pollution prevention. P2 activities may include both hazardous and non-hazardous materials.

**Pollution prevention plan.** A facility-specific guide that lists the goals of the P2 program, identifies measures to achieve those goals, and records the program's results. For additional guidance, see the sample P2 plan on the SEPM Web site.

**Recycling.** Reprocessing a used material that would otherwise become waste to recover a usable material or product. Recycling also includes the direct use or reuse of a used material without any form of reprocessing.

**Regulated waste.** Waste that is not considered RCRA hazardous waste, but is regulated under other federal, state, or local regulatory programs due to its potential for creating health and environmental hazards. Regulated waste includes polychlorinated biphenyls (PCBs) and asbestos regulated under TSCA as well as used oil, medical waste, state-designated hazardous wastes, and special wastes.

**Reuse.** The use of a product more than once in the same form for the same purpose. For example, boxes for shipping parts can be used more than once to ship parts.

**Source reduction.** Any action taken before waste is generated that reduces the waste's volume and toxicity. Examples of source reduction:

1. Modifying equipment, technology, processes, or procedures.
2. Reformulating or redesigning products.
3. Substituting less toxic raw materials.
4. Making improvements in work practices, maintenance, worker training, or inventory control.

**Undeliverable standard mail (USM).** Third-class mail that cannot be delivered for a variety of reasons. One of the most common is relocation by residents. Unless the mailer has requested address correction, forwarding, or return, the mail is discarded after verification. USM is composed of a variety of materials, including catalogs with glossy or newspaper print, flats and letters, clean or recycled paper, and adornments such as plastic covers, foils, and glassine windows. USM is sometimes referred to as "undeliverable bulk business mail."

**Universal waste.** A special type of hazardous waste subject to relaxed management standards that facilitate recycling. The federal RCRA program recognizes lamps, batteries, certain pesticides, and mercury-containing devices (thermostats and switches) to be universal waste. States may also identify wastes to be managed under their own universal waste programs.

**Waste.** Any material discarded as worthless or of no further use. This material may pose a threat to human health or the environment when disposed of.

**Waste disposal.** The final placement or destruction of hazardous, regulated, or other wastes. Disposal may be accomplished through the use of approved, secure landfills, surface impoundment, land farming, deep-well injection, or incineration.

**Waste minimization.** The reduction, to the extent feasible, of waste that is generated or subsequently treated, stored, or disposed of. It includes any reduction, reuse, or recycling activity undertaken by a waste generator that results in reducing the total volume, quantity, or toxicity of a waste.

**Waste treatment.** Any method, technique, or process (including neutralization), designed to change the physical, chemical, or biological character or composition of waste so as to:

1. Neutralize such waste.
2. Recover energy or material resources from the waste.
3. Render such waste (a) non-hazardous or less hazardous; (b) safer to transport, store, or dispose of; or (c) amenable for storage or reduction in volume.

For example, a toxic chemical may be neutralized by the addition of another chemical or substance.



# Acronyms

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AES	Automated Enrollment System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESQG	conditionally exempt small-quantity generator
CFR	Code of Federal Regulations
DLM	discarded lobby mail
EAP	emergency action plan
eMARS	Electronic Maintenance Activity Reporting and Scheduling
EPA	U.S. Environmental Protection Agency
ERM	Employee Resource Management
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FSO	Facilities Service Office
HBK	Handbook
HR	Human Resources
HVLP	high-volume, low-pressure
HW	hazardous waste
LQG	large-quantity generator
LVLP	low-volume, low-pressure
MI	Management Instruction
NCED	National Center for Employee Development
NTD	National Training Database
P2	pollution prevention
PARS	Postal Automated Redirection System
PCB	polychlorinated biphenyl
RCRA	Resource Conservation and Recovery Act
SOP	standard operating procedure
SQG	small-quantity generator
TSCA	Toxic Substances Control Act
USM	undeliverable standard mail
VMAS	Vehicle Management Accounting System

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# Attachment 1

## Hazardous Waste and Universal Waste Summary Tables

Exhibit 1-1  
Federal Hazardous Waste Generator Requirements\*

	<b>Conditionally Exempt Small-Quantity Generator (CESQG)</b>	<b>Small-Quantity Generator (SQG)</b>	<b>Large-Quantity Generator (LQG)</b>
<b>Waste Generation Rate</b>	≤ 100 kg/mo (220 lbs)	Between 100 and 1000 kg/mo (220-2200 lbs)	≤ 1000 kg/mo (2200 lbs)
<b>Facility Identification Number</b>	Not required	Required	Required
<b>Accumulation Quantity Limit</b>	≤ 1000 kg (2200 lbs)	≤ 6000 kg (13,200 lbs)	No limit
<b>Accumulation Time Limit</b>	None	≤ 180 days ≤ 270 days if transporting waste more than 200 miles	≤ 90 days
<b>Labeling or Marking</b>	Not required	Required: "Hazardous Waste"	Required: "Hazardous Waste"
<b>Off-Site Management of Waste</b>	<ul style="list-style-type: none"> <li>■ Hazardous waste (HW) permitted or interim-status facility</li> <li>■ State HW facility</li> <li>■ State municipal solid waste facility</li> <li>■ State solid waste facility</li> <li>■ Recycling facility</li> <li>■ Universal waste facility</li> </ul>	Permitted or interim status HW treatment, storage, or disposal facility	Permitted or interim status HW treatment, storage, or disposal facility

	<b>Conditionally Exempt Small-Quantity Generator (CESQG)</b>	<b>Small-Quantity Generator (SQG)</b>	<b>Large-Quantity Generator (LQG)</b>
<b>Manifest</b>	Not required, but recommended by Postal Service	Required	Required
<b>Biennial Report</b>	Not required	Not required	Required
<b>Personnel Training</b>	Not required, but recommended by Postal Service	Basic training required	Full training required
<b>Preparedness and Prevention</b>	Not required, but recommended by Postal Service	Required	Required
<b>Contingency Plan and Emergency Procedures</b>	Not required, but recommended by Postal Service	Basic plan required	Full plan required

\* State and local regulations may be more stringent than federal regulations. Area environmental specialists can provide information about state and local requirements.

**Federal Universal Waste Handler Requirements\***

	<b>Small-Quantity Handler</b>	<b>Large-Quantity Handler</b>
<b>Accumulation Quantity</b>	< 5000 kg/yr (11,000 lbs)	≤ 5000 kg/yr (11,000 lbs)
<b>Identification Number</b>	Not required	Required
<b>Accumulation Quantity Limit</b>	< 5000 kg/yr	No limit
<b>Accumulation Time Limit</b>	1 year	1 year
<b>Labeling or Marking</b>	Required — see Exhibit 1-3 for acceptable phrasing	Required — see Exhibit 1-3 for acceptable phrasing
<b>Personnel Training</b>	Basic training required	Basic training based on employee responsibilities required
<b>Off-Site Shipments</b>	Universal waste handler, destination facility, or foreign destination	Universal waste handler, destination facility, or foreign destination
<b>Tracking</b>	Not required	Must keep basic shipping records

\* Lamps, batteries, certain pesticides, and mercury-containing devices (thermostats and switches) are considered universal waste at the federal level. A state can identify additional universal wastes that will be managed under that state's universal waste program. State and local regulations may be more stringent than federal regulations. Area environmental specialists can provide information about state and local requirements.

**Labeling Options for Universal Waste\***

<b>Type of Universal Waste</b>	<b>Labeling Options (choose one)</b>
<b>Batteries</b>	<ul style="list-style-type: none"> <li>■ Universal waste — batteries</li> <li>■ Waste batteries</li> <li>■ Used batteries</li> </ul>
<b>Pesticides</b>	<ul style="list-style-type: none"> <li>■ Universal waste — pesticides</li> <li>■ Waste pesticides</li> </ul>
<b>Mercury-Containing Equipment</b>	<ul style="list-style-type: none"> <li>■ Universal waste — mercury-containing equipment</li> <li>■ Waste mercury-containing equipment</li> <li>■ Used mercury-containing equipment</li> </ul>
<b>Mercury Thermostats</b>	<ul style="list-style-type: none"> <li>■ Universal waste — mercury thermostats</li> <li>■ Waste mercury thermostats</li> <li>■ Used mercury thermostats</li> </ul>
<b>Lamps</b>	<ul style="list-style-type: none"> <li>■ Universal waste — lamps</li> <li>■ Waste lamps</li> <li>■ Used lamps</li> </ul>

\* Lamps, batteries, certain pesticides, and mercury-containing devices (thermostats and switches) are considered universal waste at the federal level. A state can identify additional universal wastes that will be managed under that state's universal waste program. State and local regulations may be more stringent than federal regulations. Area environmental specialists can provide information about state and local requirements.