Universal and Recycle Waste Management at ETF

Tank Farm Plant Operating Procedure

Effluent Treatment Facility

USQ Not Required – ETF is a < Hazard Category 3 Radiological Facility

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1.0 PURPOSE AND SCOPE

1.1 Purpose

This procedure provides instructions for managing, handling, and packaging universal waste, and recyclable materials at the Effluent Treatment Facility (ETF), LERF, TEDF, and SALDS to ensure compliance with WAC-173-303, “Dangerous Waste Regulations,” and/or HNF-57277, “Centralized Consolidation/Recycling Center Acceptance Criteria.”

1.2 Scope

This procedure applies to universal and recyclable waste generated at ETF, LERF, TEDF, SALDS.

Centralized collection areas for batteries are set up at ETF for Universal Waste (UW) batteries. The user shall follow the special directions provided at those locations for UW management. The centralized UW collection areas, which are located in 2025EA copy room and the 2025E lobby area are managed by the 616 facility Waste Operations Support, and are picked up on a monthly basis.

The procedure user must refer to ETF-65D-003 for initial container set up, tracking, inspections, closure and shipment preparation instructions.

Universal Waste storage area is located in HS-0011 and inspected on a monthly basis, inspections are covered in ETF-60K-005.

This procedure does not manage the following items:

- Excess materials with DOE property number
- Radioactive Waste Material
- Incompatible Waste material in the same container
- Drained Battery Carcasses
- Leaking or cracked batteries containing liquid electrolyte solution
- Oil Filled Batteries
- Aluminum Batteries
- Broken Sodium Vapor Lamps
- Elemental Mercury
- Aerosol cans that have been in radiological areas (excluding RMA/RBA’s).
2.0 INFORMATION

2.1 Terms and Definitions

- SWITS - Solid Waste Information and Tracking System
- Accumulation Area - An Accumulation Area is a designated location(s) in which universal waste/recyclables/materials are managed.
- Accumulation Start Date - The accumulation start date for universal waste is the date that the waste is first taken out of service and/or the date an item first goes into a container. The accumulation start date is required to be written on the item and/or the container. If, two or more containers are combined into one container, the oldest accumulation start date applies. Accumulation start date is not applicable to recycle waste.
- MCE - Mercury Containing Equipment - MCE is commonly recognized as the following, but are not limited to:
  - Thermometers
  - Thermostats
  - Barometers
  - Manometers
  - Temperature and Pressure Gauges
  - Mercury Switches.
- Recyclable Waste – Wastes which are used, reused, or reclaimed for another intended purpose. Recyclable wastes are:
  - Aerosols
  - Used Shop Towels
  - Used Oil (must be free released)
  - Lead acid batteries
  - Non-PCB electrical ballasts or capacitors (manufactured after 1978)
  - Spent antifreeze
  - Electronic-waste
  - Diesel.
2.1 Terms and Definitions (Cont.)

- UW - Universal Waste - Universal waste are specific hazardous waste streams that a generator can choose to manage in an alternative manner in place of the more complex hazardous waste requirements. Universal waste are:
  - Batteries (nickel metal hydride (NiMH), alkaline, zinc carbon, zinc chloride, lithium, wet nickel cadmium, dry nickel cadmium (Ni-Cd) with the exception of lead acid batteries
  - Lamps with the exception of intentionally broken lamps
  - Mercury containing equipment (MCE).

2.2 General Information

2.2.1 Universal waste must be marked with an accumulation start date (the date an item is removed from service and/or first goes into a container). Items may accumulate for one year, before shipping. WRPS has implemented an administrative control for accumulation up to nine months.

2.2.2 Containers should be arranged such that the universal waste marking with accumulation start date or the recycle material marking is visible for inspection.

2.2.3 Universal waste and recyclable materials containers shall be closed except when adding or removing waste. For cardboard boxes, such as those used for light tubes, this will include taping the top and hand holds closed.

2.2.4 If universal waste from multiple containers is consolidated into a single container, the oldest accumulation start date applies to the consolidated container. Labels associated with the emptied shipping containers should be removed, or defaced to indicate EMPTY.

2.2.5 Radiological Evaluation for Release (A-6004-227) must be completed for all Universal Waste to be shipped to or picked up by 616 Operations personnel.
3.0 PRECAUTIONS AND LIMITATIONS

3.1 Radiation and Contamination Control

3.1.1 Work in radiological areas will be performed using a radiological work permit following review by Radiological Control per ALARA Work Planning procedure, TFC-ESHQ-RP_RWP-C-03.

3.1.2 Form A-6004-227 Radiological Evaluation for Release must be completed for each container before shipment.

3.2 Environmental Compliance

NOTE - The Washington State Department of Ecology UW regulations (WAC-173-303-573 (22)) states “a large quantity handler of UW may accumulate UW for no longer than one year from the date the UW is generated.” The administrative time requirement for accumulating UW for WRPS is less than nine months, to ensure adequate time to package and ship the UW to 616 and/or CCRC.

3.2.1 In the event of a spill/leak/release to the environment, IMMEDIATELY notify the SOM/FWS and respond per ETF-ERP-85B-003, Emergency Spill or Release at ETF.
4.0 PREREQUISITES

4.1 Special Tools, Equipment, and Supplies

The following supplies may be needed to perform this procedure:

- Scale capable of measuring both pounds and kilograms
- Permanent marker
- Protective envelope
- Universal Waste used batteries, lamps WAC 173-303-573 stickers
- Recycle stickers
- Containers, such as: Drums, Boxes (wood, fiberboard), Plastic buckets (2 ½ gallon or bigger)
- Poly bags (minimum 4 mil liners)
- Universal Polypropylene (UPP), or equivalent
- Scotch tape
- Clear packing tape
- Electrical tape
- Duct tape
- Plastic bags
- Aerosol caps
- Battery caps.

4.2 Performance Documents

The following documents may be needed to perform this procedure:

- ETF-65D-003, Package Waste
- Site Form A-6004-227, Radiological Evaluation for Release
- Site Form A-6006-652, Used Oil-CCRC Certification Form
- Site Form A-6007-391, ETF Universal Waste/Recycle Material Inventory Sheet.
5.0 PROCEDURE

5.1 Universal Waste/Recycle Material Handling and Packaging

NOTE - UW batteries, electrical ballasts or capacitors, mercury containing equipment, and light bulbs/lamps are routinely picked up by Electricians as “material of trade” and delivered to the 616 facility for consolidation and management.

- ETF Operations is responsible for proper storage, inspections, marking, labeling and packaging of UW and Recycle materials.

- TFC-OPS-WM-C-26 provides instructions for setting up a new UW/Recycle Accumulation Area (AA).

Special Instructions

UW that is not routinely picked up by 616, (e.g., lead acid, mercury containing equipment), facility for consolidation will require a CIN/PIN # and completion of the associated CCRC shipment form. Refer to ETF-65D-003 for assigning CIN/PIN#, container set up, and inspection.

Site Form (A-6007-391) and a Radiological Evaluation Release Site Form (A-6004-224) must be completed for all UW/Recycle waste containers, with the exception of UW batteries.

UW must be shipped within nine months of the initial accumulation date to comply with requirements in TFC-OPS-WM-C-26.

5.1.1 ENSURE the universal/recyclable material has been cleared from radiological controls and falls into one of the categories identified in Attachment 1.

5.1.2 INITIATE a PIN file.

NOTE - A non-routine waste stream are things such as lead acid batteries, mercury containing equipment, or other items as directed by WMS.

5.1.3 IF generating a nonroutine waste stream, SET UP AND INSPECT container in accordance with ETF-65D-003.

5.1.4 COMPLETE Site Form (A-6007-391) in concurrence with use of this procedure.
5.2 UW/Recycle Waste Marking and Labeling

5.2.1 **LABEL** new containers with a UW label **AND**

**MARK** the label with the UW type (e.g., fluorescent bulbs, mercury vapor lamps).

5.2.2 **MARK** the earliest accumulation date on the label for the first time waste was added to the container.

5.2.3 **IF** collection containers are used for shop towels, aerosol product cans, lead acid batteries or non-PCB electrical ballasts and capacitors, **LABEL** with the recycle chasing arrow logo and the waste stream ID.

5.2.4 **IF** collection container is for used oil, **MARK** the container with the words “Used Oil”.

5.2.5 **IF** collection container is used for spent antifreeze, **MARK** container with the words “Spent Antifreeze”.

5.3 UW Batteries

NOTE - A leaking battery is no longer universal waste and is handled as hazardous waste per ETF-65D-003.

5.3.1 SEGREGATE batteries according to variety/type (e.g., lithium, alkaline, and others).

5.3.2 VERIFY battery contacts are protected from short circuiting with scotch tape or plastic bags for lithium batteries.

5.3.3 IF disposing of batteries greater than 9 volts:

TAPE with heavy duty clear packing tape (preferred) OR

TAPE with electrical or fabric reinforced tape.

5.3.4 IF disposing of wet/lead acid batteries, go to Section 5.8 of this procedure.

5.3.5 DISPOSE of UW batteries per instructions provided at 2025EA copy room, 2025E lobby, or container as identified by Waste Management Specialist (WMS).

5.3.6 VERIFY Universal Waste “Used Battery” label is on container.

5.3.7 IF a date is not marked on the “Start/First-In Date” line, ENTER the current date.
5.4 Lamps/Bulbs

NOTE - Lamps/bulbs which are NOT intentionally broken are managed as Universal Waste. Bulbs intentionally broken are managed as hazardous waste as directed in ETF-65D-003.

Cracked and/or broken sodium (high and low-pressure), and mercury HID lamps are managed as hazardous waste.

5.4.1 PAD all sharp edges, AND

PLACE broken lamp material and residue (excluding clean up debris) in a plastic bag and tape/seal.

5.4.2 SEGREGATE lamp type, such as mercury vapor, florescent tubes, compact fluorescent, etc.

5.4.3 IF packaging four foot or eight foot fluorescent lamps, PACKAGE four foot or eight foot fluorescent lamps in original manufacturer box or UW box supplied by CCRC.

5.4.3.1 CUSHION lamps inside container.

5.4.3.2 SECURELY TAPE closed the container.

5.4.4 IF packaging other lamps/bulbs, PLACE lamp/bulb inside original box or clear plastic bag AND

PLACE in collection container.

5.4.4.1 CUSHION lamps/bulbs inside container.

5.4.4.2 SECURELY TAPE closed the container.

5.4.5 ENSURE container is taped, including taping over any hand holds, and/or securely closed when not in use.

5.4.6 VERIFY Universal Waste “Lamps/bulbs” label is on container.

5.4.7 IF a date is not marked on the “Start/First-In Date” line, ENTER the current date.

5.4.8 IF the container is full or ready for pickup for delivery to 616, VERIFY the box is taped closed on both ends.
5.4  Lamps/Bulbs (Cont.)

5.4.9  MARK the container with the type and number of lamps inside the box.

5.4.10 COMPLETE Site Form (A-6007-391) and Radiological Evaluation for Release Form (A-6004-227).
5.5 Mercury Containing Equipment

NOTE - The following are examples of Mercury Containing Equipment (MCE):
- Thermometers
- Thermostats
- Barometers
- Manometers
- Temperature and pressure gauges
- Mercury switches.

5.5.1 **OBTAIN** manufacturer information, SDS#, and description of MCE to be disposed **AND**

**PROVIDE** to WMS.

5.5.2 **IF** packaging mercury containing thermostats, **PACKAGE** separately from other mercury containing equipment.

5.5.3 **(WMS)** **CONTACT** CCRC for special packaging determinations **AND**

**PROVIDE** directions for packaging.

5.5.4 **INVENTORY AND RECORD** MCE information in Site Form (A-6007-391).
5.5 Mercury Containing Equipment (Cont.)

5.5.5 WEIGH MCE item to be packaged AND

IF available, DETERMINE weight of mercury, weight of glass, weight of metal.

5.5.5.1 RECORD weight information in Site Form (A-6007-391).

5.5.6 PLACE items in prepared collection container.

5.5.7 PACKAGE MCE per WMS instructions.

5.5.8 CUSHION MCE securely in containers to minimize breakage.

5.5.9 VERIFY Universal Waste label is marked with MCE/type on container.

5.5.10 IF a date is not marked on the “Start/First-In Date” line, ENTER the current date.

5.5.11 IF container is full, WEIGH container AND

RECORD gross weight in Site Form (A-6007-391).

5.5.12 COMPLETE Site Form (A-6007-391) entries and Radiological Evaluation for Release Form (A-6004-227)

5.5.13 RETURN completed Site Form (A-6007-391) and Site Form (A-6004-227) to SOM.

5.5.14 (SOM) REVIEW Site Form (A-6007-391) AND

PROVIDE to WMS.

5.5.15 IF MCE is ready for shipment, GO TO Section 5.12.
5.6 Aerosol Cans

5.6.1 IF packaging flammable material, ENSURE flammable material is packaged separate and segregated from non-flammable material.

5.6.2 (WMS) DETERMINE if aerosol is to be excluded from recycling.

5.6.3 IF caps are needed, CONTACT WMS or Dispatch.

5.6.4 PLACE capped aerosol can in the designated Aerosol Recycle cabinet or as directed by WMS/SOM.

5.6.5 VERIFY storage cabinet or container is labeled with a Recycle sticker and marked with “Aerosol Cans”.

5.6.6 INVENTORY AND RECORD aerosol can description and SDS # in Site Form (A-6007-391).

5.6.7 RECORD N/A for net weight lbs of aerosol cans.

5.6.8 IF aerosol cabinet or container is full NOTIFY WMS.

5.6.9 WEIGH container and record gross weight in Site Form (A-6007-391).

5.6.10 COMPLETE Site Form (A-6007-391) entries and Radiological Evaluation for Release Form (A-6004-227)

5.6.11 RETURN completed Site Form (A-6007-391) and Site Form (A-6004-227) to SOM.

5.6.12 (SOM) REVIEW Site Form (A-6007-391) AND PROVIDE to WMS.
5.7 Electrical Ballasts or Capacitors without Battery

5.7.1 ENSURE capacitors have been discharged.

5.7.2 IF managing electrical ballasts or capacitors that contain PCB, GO TO ETF-65D-003.

NOTE - Electrical ballasts/capacitors should be no larger than 12 in by 12 in or no bigger than a five gallon container.

5.7.3 WRAP ballasts/capacitor in clear plastic bag AND

SEAL bag closed with J-Seal.

5.7.4 IF ballasts/capacitor is larger than a five gallon container, NOTIFY WMS AND

OBTAIN additional packaging instructions.

5.7.5 WEIGH bagged non-PCB ballasts/capacitors and document on Site Form (A-6007-391).

5.7.6 PLACE ballasts/capacitor in prepared container.

5.7.7 VERIFY container is labeled Recycle and marked “Non-PCB ballasts/capacitors”.

5.7.8 IF container is full, WEIGH container AND

RECORD gross weight in Site Form (A-6007-391).

5.7.9 COMPLETE Site Form (A-6007-391) entries and Radiological Evaluation for Release Form (A-6004-227)

5.7.10 RETURN completed Site Form (A-6007-391) and Site Form (A-6004-227) to SOM.

5.7.11 (SOM) REVIEW Site Form (A-6007-391) AND

PROVIDE to WMS.

5.7.12 IF electrical ballasts or capacitors are ready for shipment, GO TO Section 5.12.
5.8 Lead Acid Batteries

Special Instructions

All battery terminals shall be protected or packaged by using electrical tape, duct tape or capped to avoid being short circuited.

Lead acid batteries will be packaged in wood battery boxes. Lids need to be hinged to the box and secured with a metal clasp/hasp. Battery box(es) will be protected from the weather.

NOTE - Leaking, cracked or bulging batteries are not acceptable for recycling and must be managed as hazardous waste.

5.8.1 ESTABLISH a PIN file and set up container as outlined in ETF-65D-003.

5.8.2 MARK container and Site Form (A-6007-391) with container PIN #.

5.8.3 PLACE Site Form (A-6007-391) into protective envelope taped to inside lid or top of box.

5.8.4 VERIFY container is marked with a Recycle label and “Lead Acid, Gel Cell Batteries for Recycle”.

5.8.5 ENSURE battery contacts are covered with duct tape, electrical tape, or are capped.

5.8.6 WRAP lead acid battery in clear plastic bag AND SEAL bag closed with J-Seal.

5.8.7 INVENTORY AND RECORD battery(ies) in Site Form (A-6007-391).

5.8.8 WEIGH battery(ies) AND RECORD in Site Form (A-6007-391).

5.8.9 PLACE battery(ies) into prepared wood shipping box.

5.8.10 CLOSE container AND SECURE storage location.
5.8 Lead Acid Batteries (Cont.)

5.8.11 IF container is full, **WEIGH** container AND **RECORD** gross weight in Site Form (A-6007-391).

5.8.12 **PLACE** item in prepared container.

5.8.13 **COMPLETE** Site Form (A-6007-391) entries and Radiological Evaluation for Release Form (A-6004-227)

5.8.14 **RETURN** completed Site Form (A-6007-391) and Site Form (A-6004-227) to SOM.

5.8.15 **(SOM) REVIEW** Site Form (A-6007-391) AND **PROVIDE** to WMS.

5.8.16 IF lead acid batteries are ready for shipment, **GO TO** Section 5.12.
5.9 Used Shop Towels

NOTE - The CCRC contract is set up to ensure that towel exchanges are more frequent than 180 days.

- Shop towels are stored in the Used Shop Towels Recycle container located in the Maintenance shop.

- Operations and Maintenance are encouraged to use shop towels whenever possible for waste minimization.

Special Instructions

The following are not allowed in Used Shop Towels containers:

- Radioactive or PCB contaminated shop towels
- Free liquids.

5.9.1 ENSURE the amount of hazardous substance on used shop towel is minimal.

5.9.2 DISPOSE of shop towel(s) in container.

5.9.3 ENSURE used shop towel container is closed when not in use.

5.9.4 NOTIFY WMS if used shop towel container is \( \frac{3}{4} \) full.
5.10 Used Oil/Diesel Fuel

5.10.1 PRIOR to adding used oil or diesel to recycle container, OBTAIN approval from WMS or as directed by the Waste Planning Checklist.

5.10.2 SET UP AND INSPECT container per ETF-65D-003.

5.10.3 VERIFY that Recycle label is present on the container, and container is marked “Used Oil” or “Used Diesel”

5.10.4 CAREFULLY POUR used oil or used diesel into container.

5.10.5 UPDATE Site Form (A-6007-391) each time oil or diesel is added to the container, including SDS #.

5.10.6 CLOSE AND SECURE container when not in use.

5.10.7 NOTIFY WMS when container is ¼ full.

5.10.8 COMPLETE Used Oil-CCRC Certification, Form A-6006-652.

5.10.9 COMPLETE Site Form (A-6007-391) entries and Radiological Evaluation for Release Form (A-6004-227)

5.10.10 RETURN completed Site Form (A-6007-391) and Site Form (A-6004-227) to SOM.

5.10.11 (SOM) REVIEW Site Form (A-6007-391) AND PROVIDE to WMS.
5.11 Spent Propylene Glycol Antifreeze

Special Instructions

Spent propylene glycol antifreeze must not be mixed with another dangerous waste, oil, or PCBs.

Spent propylene glycol antifreeze must be stored on a secondary containment pallet.

5.11.1 SET UP AND INSPECT container per ETF-65D-003.

5.11.2 VERIFY that Recycle label is present on the container, and container is marked “SPENT”.

5.11.3 CAREFULLY POUR into container.

5.11.4 UPDATE Site Form (A-6007-391).

5.11.5 CLOSE container when not in use.

5.11.6 NOTIFY WMS when container is \( \frac{3}{4} \) full.

5.11.7 COMPLETE Site Form (A-6007-391) entries and Radiological Evaluation for Release Form (A-6004-227)

5.11.8 RETURN completed Site Form (A-6007-391) and Site Form (A-6004-227) to SOM.

5.11.9 (SOM) REVIEW Site Form (A-6007-391) AND PROVIDE to WMS.
5.12 Shipment Preparation

5.12.1 **ENSURE** Site Form (A-6007-391) is complete.

**NOTE** - CCRC forms can be found at http://msc.rl.gov/rapidweb/POLPREV/index.cfm?PageNum=47.

5.12.2 **COMPLETE** appropriate CCRC shipping forms.

5.12.3 **REVIEW** PIN file paperwork for accuracy and completeness.

5.12.4 **PROIVDE** CIN/PIN file to WMS.

5.12.5 **APPLY** additional markings and/or labels per Authorized Shipper instructions.

5.12.6 **UPDATE** shipment date in the Waste Tracking Logbook.
5.13 Records

NOTE - WTS organization is responsible for record retention and retirement in accordance with TFC-BSM-IRM_DC-C-02.

- General record keeping practices must include entries, which are clearly and neatly written in English using black ink, mistakes or deletions are one lined, initialed, and dated.

5.13.1 **PERFORM** the following for records identified within this procedure.

5.13.1.1 **RECORD** the number of times the record was generated in applicable column

**OR**

**PLACE** a check mark (✓) in the N/A column.

5.13.1.2 **SUBMIT** the package to WTS Records custodian.

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<td>A-6004-227, Radiological Evaluation For Release</td>
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<tr>
<td>A-6006-652, Used Oil-CCRC Certification</td>
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<tr>
<td>A-6007-391, ETF Universal Waste/Recycle Material Inventory Sheet</td>
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<td><strong>SEND</strong> the completed records with Records Submittal Checklist attached to the WTS Records custodian for records retention.</td>
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___________________________ / _____________________ / __________
Signature Print (First and Last) Date

The record custodian identified in the company-level Record Inventory and Disposition Schedule (RIDS), is responsible for record retention in accordance with TFC-BSM-IRM_DC-C-02.
Attachment 1 – Universal Waste Categories

The following is a list of the categories that UW must be within after clearing radiological controls:

- Radiological Evaluation for Release Site Form A-6004-224
- Universal Waste Mercury-Containing Equipment
  - Excludes: Elemental mercury, mercury ampoules
- Universal Waste Batteries
- Aerosol Products, excluding:
  - Pesticides
  - Herbicides
  - Expanding foam sealants
  - Cold galvanizing compounds
  - Corrosives (pH <2 - >12.5)
  - 20% ether (methyl, ethyl, diisopropyl products)
  - Aerosol cans without caps
  - Jumbo aerosol cans greater than 3 in. in diameter
  - Aerosol cans that have been in a radiological area (excluding RMA/RBAs).
- Lead Acid Batteries, excluding:
  - Drained battery carcases
  - Leaking or cracked batteries containing liquid electrolytic solution
  - Oil filled batteries
  - Missile aluminum
  - Absolyte batteries
  - Glass cased batteries are accepted on a case by case basis.
- Electric ballasts or capacitors, excluding:
  - PCB containing ballasts or capacitors
  - Ballasts or capacitors that are defined as dangerous waste (designation required)
  - Electrical ballasts or capacitors that contain batteries shall be managed as UW batteries.
- Used Shop Towels
- Used Oil/Oil filters
- Spent Antifreeze
- Diesel fuel
- Propylene Glycol.