

Reverse Logistics Data

The following is the methodology used in determining data for COSTHA Reverse Logistics Proposal:

1. A meeting was held with EPA officials in Iowa City, IA to explain proposed program. One of the suggestions from EPA was to determine the amount of waste being reported by retailers and associated businesses.
2. Information was gathered from four known waste management companies, one of which has been successful in gathering information from major retailers. All information gathered is confidential. The waste management companies and retailers did not wish to be identified. The retailers examined account for many of the large companies in the U.S. as well as a limited number of distributors of consumer products.
3. While we did not capture all sectors of the retail industry, we did make assumptions using sales figures based on NAICS Codes as a percentage of the known figures.
4. The figures were gathered over a four year period. The data gathered we feel indicates only about 20% of the overall issue. Since distributors and retailers have the same issues, the numbers reflect both sides of the business. Ten companies were examined.
5. The attached spread sheet reflects the information gathered. While several million pounds are reflected by pure characteristic waste codes, there are also several million pounds that were considered as ORM-D waste for transportation purposes. The waste codes for these products were D001, D002, and D003. Other products that could not be described as Waste ORM-D due to packaging issues etc. were considered loose packs and placed into drums
6. In addition to the quantities reflected in the attached spread sheet, we are aware that many states have their own hazardous regulations/requirements. While many of the states have more stringent requirements there are a few states that allow certain consumer products to be disposed of as Universal Waste. For example:
 - a. Texas allows the disposal of aerosols as universal waste. In addition Texas also allows paint and paint related materials to be disposed as universal waste. This means that in addition to paint, materials such as varnish, paint thinner etc. All of which could appear under waste code D001, are treated as universal waste.
 - b. Colorado allows aerosols to be disposed of as universal
 - c. California, with some of the most stringent hazardous waste regulations in the country allows aerosols to be treated as universal waste under certain circumstances.

- d. It should also be noted that all states and the RCRA regulations allow pesticides to be treated as universal waste, many of which are more toxic than products examined in this study all of which are personal care and household goods items.
7. Other Regulatory Requirements affecting Consumer products:
- a. Transportation regulations: 49CFR 100-185 excepts consumer commodities (household goods, personal care items,) (drugs and medicines i.e. pharmaceuticals) to be excepted from specification packaging regulation, hazard warning labels and shipping papers. Waste ORM-D materials when shipped in their original containers are excepted from specification when shipping under Special permits and under certain circumstances under 49CFR173.156. Yet these same products when being returned to retail establishments out of their master shipping container must be accumulated by retailers as hazardous waste, placed in UN specification containers and be shipped under current DOT hazardous materials regulations.
 - b. The UN Model regulations have adopted universal regulations that will de-emphasize the dangers of consumer products/limited quantities in international and local domestic transportation. International standards will reflect these changes in 2011.
 - c. 29CFR1910.1200, exempts many of these same consumer products from current MSDS requirements.
 - d. EPA has issued a proposed rule to treat pharmaceutical products as universal waste. Many of the pharmaceutical products may be as dangerous products being addressed in this study.