

WHAT YOU SHOULD KNOW ABOUT MANAGING YOUR USED MERCURY-CONTAINING LAMPS

A Guide to Understanding EPD's Universal Waste Regulations Regarding Used Mercury-Containing Lamps

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WHY ARE THERE ENVIRONMENTAL REGULATIONS FOR USED MERCURY-CONTAINING LAMPS?

Most fluorescent lamps and High Intensity Discharge (HID) lamps contain mercury. The mercury is in vapor form, and is essential in emitting the ultraviolet light that makes fluorescent and HID lamps glow. Lamps that use mercury include common fluorescent lamps, compact fluorescent lamps (CFL's) metal halide lamps, and high-pressure sodium lamps used for floodlights and streetlights.

Because mercury can be extremely harmful to humans and the environment, used lamps are required to be managed as hazardous waste or Universal Waste.

WHO IS REGULATED?

Any facility that generates or accumulates 220 pounds or more of hazardous waste per month is subject to regulation under the Rules for Hazardous Waste Management. **However, it takes more than 350 4-foot fluorescent lamps to make 220 pounds.** Facilities generating less than 220 pounds per month are exempt as long as they insure that the waste is disposed of in a permitted sanitary landfill. Households are exempt from these regulations. We recommend recycling whenever possible.

WHAT DO THE REGULATIONS REQUIRE?

The regulations offer two options: (1) You can choose to recycle the used lamps as Universal Waste under the Standards for Universal Waste Management (40 CFR Part 273), or (2) You can choose to dispose of the used mercury-containing lamps, but you will have to manage them as hazardous waste under the hazardous waste regulations.

UNDER THE UNIVERSAL WASTE REGULATIONS, USED LAMPS ARE REQUIRED TO BE:

- ⇒ Recycled (**NOT** disposed of) at a permitted recycling facility.
- ⇒ Handled in a manner that prevents breakage prior to recycling (containers are required to be sealed when not in use).
- ⇒ Containerized and labeled as "Used Lamps" or "Universal Waste-Lamps."
- ⇒ Removed from the location where generated within one year of the accumulation start date.
- ⇒ Shipped in accordance with Department of Transportation (DOT) shipping requirements.

Unintentionally broken lamps are required to be completely cleaned up and all residues containerized. The debris can still be managed as Universal Waste. Lamps broken intentionally in a lamp-crushing device are required to be managed as hazardous waste for mercury (Hazardous Waste Code D009).

Persons handling used lamps are required to be trained in how to manage them in accordance with the regulations.

You are prohibited from accumulating more than 12,000 used mercury-containing lamps at any one time, unless you have an approved financial assurance mechanism, an approved closure plan, a contract (including pricing) from a permitted recycling facility, and insurance.

If you manage your used lamps according to the regulations for Universal Waste, you are **NOT** required to:

- ⇒ Count the weight of the lamps towards your status as a hazardous waste generator.
- ⇒ Conduct expensive waste classification testing.
- ⇒ Pay hazardous waste fees on the lamps.

COMMONLY ASKED QUESTIONS ABOUT MANAGING USED MERCURY-CONTAINING LAMPS

I generate approximately 200 pounds of hazardous waste each month. I also throw away 100 lamps each month. How does the Universal Waste rule help me?

If you abide by the Universal Waste regulations, you do not have to add the weight of the lamps to your hazardous waste. You would not become a small quantity generator and would not have to pay small quantity generator hazardous waste fees.

What are the requirements for Universal Waste transporters?

Used lamps can only be transported to another Universal Waste transporter, handler or a permitted destination facility. A regulated handler is required to obtain permission from the permitted destination facility prior to shipment of used lamps. Transporters are required to comply with all applicable DOT regulations (49 CFR 171.8) for the shipment of used lamps, and cannot store lamps for more than 10 days.

For more information, contact the Generator Compliance Program in the EPD Hazardous Waste Management Branch at 404-657-8831, or go to our website at www.epd.org.

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