

MESSAGE FOR WHOLESALE ELECTRICAL DISTRIBUTORS

We encourage distributors to review the "[Message for All.doc.](#)"

OVERVIEW

Any electrical distributor who sells energy-efficient lighting for buildings can assist owners with lamp recycling. This presents distributors with a new business opportunity. A take-back program, where the distributor collects and sends the spent lamps to a recycling company can be a new profit center, offered as a value-added service for better customer relations. Distributors can establish relationships with lamp recyclers and can physically handle lamps or set up "box programs" so customers can ship directly to recyclers. Any recycler found at www.almr.org can supply details on box programs. Since building owners and contractors are your key customers, it is important for you to have an understanding of the regulations that apply to these customers.

FEDERAL AND STATE RULES

Most states in the U.S. have adopted a less burdensome set of regulations for dealing with hazardous waste lamps and several other hazardous waste items. These regulations are known as the Universal Waste Rule (UWR). If lamps are sent for recycling under the UWR, there are less stringent requirements for storage, record keeping and transportation as compared to managing them under the full Subtitle C hazardous waste requirements.

If distributors choose to recycle lamps under the less burdensome Universal Waste Rule, then the following applies:

Distributors offering recycling services may be considered "handlers" under the UWR if they accumulate spent lamps in their own facilities. Universal waste handlers are divided into two categories by the amount of universal waste they produce. Each category has slightly different requirements:

Small Quantity Handler of Universal Waste (SQHUW) - A generator (building owner) or third party (distributor) who accumulates <5,000 kg of universal waste (such as spent mercury-containing lamps) at a time. No EPA ID is required. Storage time for the waste is up to one year. Employees are required to have minimal training and information on proper handling and emergency procedures regarding mercury-containing lamps. Proper marking and labeling of universal waste is required. SQHUW requirements are found at 40 CFR 273 Subpart B.

Large Quantity Handler of Universal Waste (LQHUW) - A generator (building owner) or third party (distributor) who accumulates $\geq 5,000$ kg of universal waste (such as mercury-containing lamps) at a time. An EPA ID is required, and state registration may also be required. Storage time for the waste is up to one year. Employees are required to have training and information on proper handling and emergency procedures regarding

mercury-containing lamps. Proper marking and labeling of universal waste is required. LQHUW requirements are found at 40 CFR 273 Subpart C.

Universal Waste Transporter - One who engages in the process of transporting waste lamps for ≤ 10 days. A transporter may not store, accumulate, dispose, dilute, or treat universal waste lamps. No EPA ID is required. Proper marking and labeling of waste lamps is required. Transporter requirements are found at 40 CFR 273 Subpart D.

Both SQHUWs and LQHUWs are exempt from the full Subtitle C hazardous waste (HW) manifest requirements. A record of shipment is required for LQHUWs, and may take the form of a bill of lading (BOL) or other shipping document. In both cases, shipments can be made through a common carrier, instead of a certified hazardous waste hauler. No analytical testing or reporting of lamps is needed for recycling.

In summary, the following applies:

- Accumulation- can be for up to one year
- Transportation- can be done via common carrier
- No permitting is required

CRUSHING

Under federal regulations, intentionally breaking lamps (crushing) is considered “treatment.” Those who treat lamps (e.g., by drum-top crushing) are subject to full Subtitle C regulations rather than the UWR regulations. For more information on crushing, please see the “[Message for All.doc](#).” However, certain authorized state programs allow both whole and intentionally crushed lamps to be managed under the UWR. Handlers that choose to intentionally crush lamps must do so in accordance with authorized state programs. For more information specific to your state, consult the State-by-State Stringency Comparison Table, “[Message re- State Stringency.doc](#).”

As a distributor, if you offer lamp recycling “box programs” to your customers, and you do not accumulate or store spent lamps in your own facilities, you are not typically subject to hazardous waste regulations. A box program involves setting up an arrangement for your customer to purchase a lamp storage box for which the transportation and recycling costs are prepaid.

LIGHTING RETROFITS

As a distributor, you are frequently involved in the sale of efficient lamps for retrofits. Any lighting retrofit will generate a large number of waste lamps. These lamps may contain some combination of mercury, cadmium, antimony and lead. Environmental considerations call for everyone involved in a lighting retrofit project to pay close attention to proper disposal of this waste.

The services of a competent, properly licensed, recycling service for both lamps and ballasts is highly recommended for any retrofit project. It should be noted that the most significant environmental enforcement actions concerning incorrect handling of waste lamps and ballasts have involved lighting retrofits.

In the U.S., if the lamps classify as hazardous waste, it is the responsibility of the *owner* to manage the waste correctly; and *contractors* involved may share that *legal responsibility*. While distributors have no specific legal responsibility for end-of-life management of the lamps they sell (except for lamps in their own facilities), distributors can be influential in assisting customers with recycling options.

OTHER JURISDICTIONS

The Canadian provinces have similar concerns about environmentally responsible lamp disposal. Lamp recyclers are also available in Canada. The www.lamprecycle.org website has information on lamp disposal and recyclers in Canada. Mexico has passed a version of the U.S. UWR, which includes mercury-containing lamps. Implementation is the responsibility of the 31 states. Details are not yet available.

LAMP BREAKAGE

While lamp breakage is of some concern to distributors (primarily if you receive shipments with broken lamps into your warehouse), the parties most concerned with this issue are your customers, the *contractors* and *owners*.

The major exposure to mercury in lamps arises from lamp breakage. As the old lamps are removed from their sockets, they should be carefully packed to avoid breakage. Federal rules suggest using the cartons supplied with the new lamps for this purpose; alternatively, the lamp recycling service may be able to provide larger containers that will minimize the labor and handling involved. States have different requirements regarding the number of broken lamps that can be included in a shipment of universal waste lamps. Careful handling of waste lamps will, therefore, minimize disposal costs.

For more information specific to your state, consult the [State-by-State Stringency Comparison Table](#). We also encourage you to set up recycling programs for the spent mercury-containing lamps in your own facilities.

SETTING UP RECYCLING SERVICES

Recycling services are provided by Association of Lighting and Mercury Recyclers (ALMR) member companies anywhere in the United States and its territories, Mexico and Canada. Services are available to large lamp users, small businesses, contractors, municipal government agencies and they are also available to households and the public through household waste collection programs. Either directly or through a network of transportation and solid waste contractors, material can be picked up in any U.S.

community. There are also a number of lighting, maintenance and other building contractors who will collect spent lamps and get them recycled for their customers.

Lamp collection programs can be designed for all generators:

- Small users can participate by using a “box program”, where a container is provided and when full it can be sent to any recycler via ground mail shipment. This is a prepaid program and labels and shipping papers are provided.
- For larger users, recyclers can arrange milk-run pick-ups and common carriers will transport lamps to accumulation facilities throughout the country, where they are consolidated for shipment to destination facilities.
- For very large generators, materials can be picked up in trailer loads as needed.
- There are numerous collection locations around the country that ship large quantities of lamps to recycling “Destination Facilities” (state authorized recyclers) every day.
- Recyclers typically provide customer services and containers, and will also arrange all aspects of getting lamps recycled for anyone who is interested.
- Individuals and small users can also take lamps to any locally operated household waste facility in their community. For a list of community programs see www.earth911.org.

“Lamp Recycling. The Responsible Thing To Do.”©

For more information visit

www.lamprecycle.org

or

www.almr.org