

TI-913

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Short Description:

Fluorescent Light Disposal.

Inquiry:

The PBS Environmental Hotline caller requested information regarding the regulations applicable to the management of fluorescent light bulbs in Illinois.

Response:

The General Services Administration (GSA) currently has no policy regarding this matter. The caller is referred to the Federal and state-specific requirements.

Federal Requirements

Fluorescent lights are regulated as Resource Conservation and Recovery Act (RCRA) hazardous wastes if they exhibit a hazardous characteristic (e.g. contain mercury or lead at levels, which exceed TCLP thresholds). Studies undertaken have shown that "when the TCLP is performed ...fluorescent lamps consistently exceed the TCLP for mercury." (See "Analytical Results of Mercury in Fluorescent Lamps" available from the EPA RCRA docket). The RCRA requirements that apply to the management of fluorescent light bulbs are triggered by the amount of all hazardous waste generated and/or accumulated at a facility in a given period of time. State requirements must be at least as stringent as the federal requirements.

Under RCRA, conditionally exempt small quantity generators (CESQGs) of hazardous wastes (i.e. facilities that generate less than 100 kg [220 lbs] of hazardous wastes in a month and do not at any time accumulate more than 1000 kg [2,200 lbs.] of hazardous wastes) may legally dispose of hazardous wastes (including fluorescent light bulbs that exceed the TCLP test for mercury) in municipal or other non hazardous waste systems. CESQG may also treat wastes at the site of generation without obtaining a RCRA permit (See 40 CFR 261.5).

Facilities which do not qualify for CESQG status may manage fluorescent light bulbs as "universal wastes" pursuant to the universal waste rule (40 CFR 273), which became effective July 6, 1999. Universal wastes are subject to less stringent management standards than other hazardous wastes.

Small quantity universal waste generators (those who never accumulate more than 5000 kg [11,025 lbs.] of total universal waste, including waste batteries, pesticides, mercury containing thermostats and lamps) are required to:

- Manage fluorescent light bulbs in a way that prevents releases of wastes to the environment (i.e. contain waste light bulbs in closed containers that are

structurally sound; immediately clean up broken bulbs and place them in closed containers);

- Label fluorescent light bulb containers with one of the following phrases: "Universal Waste -Lamps" or "Waste Lamps" or "Used Lamps;" and

- Maintain records that demonstrate no waste fluorescent light bulbs have been stored on site for more than 1 year from when it became a waste.

Small quantity handlers of universal wastes are prohibited from sending or taking fluorescent light bulbs to a place other than another universal waste handler or a destination facility (e.g. RCRA permitted TSD facility). Small quantity handlers may not treat (e.g. crush) fluorescent light bulbs. Small quantity handlers do not have to prepare RCRA manifests for universal wastes but transporters must comply with DOT regulations that would be applicable to the waste if it were being transported as a product. (See 40 CFR 273.10).

More stringent standards are applicable to large quantity universal waste handlers (accumulate more than 5000kg of total universal waste on their property) (See 40 CFR 373.30).

Illinois Requirements

The Illinois hazardous waste program incorporates by reference the federal RCRA program with some exceptions/differences. One, Illinois allows the crushing of bulbs at the point of generation. Two, Illinois CESQGs are not allowed to dispose of fluorescent bulbs in non-hazardous waste landfills (See Illinois statutes, 415 Ill. Comp. Stat. 5/1 et seq., and regulations, Ill. Admin. Code title 35, Parts 721 and 722 for further CESQG information).

The citation for the Illinois hazardous waste regulation is Ill Admin. Code title 35, Parts 720-738. The "universal waste" regulation is found at Ill Admin. Code title 35, Part 733. Additional information, or further clarification, is available from the Illinois EPA Disposal Alternative Unit.

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