

*Information for . . .*

## **Contractors Who Install and Service Lighting Systems**

Federal and state rules allow lamp generators and contractors to collect and accumulate lamps for recycling without a regulatory burden. This can be a business opportunity for contractors. Under Federal (and most state ) law, handlers of lamps are categorized as follows:

**Small Quantity Handler of Universal Waste** (SQHUW) A generator or third party (contractor) who accumulates <5,000 kg at a time, and stores them up to one year. SQHUWs do not need to obtain U.S. EPA registration. Training and information on handling mercury lamps and emergency procedures is required, however, as is proper marking and labeling.

**Large Quantity Handler of Universal Waste** (LQHUW) A generator or third party who accumulates >5,000 kg at a time, up to one year is a large quantity handler. This status requires U.S. EPA or state registration and ID number. As with small quantity generators, training and information on handling mercury lamps and emergency procedures, as well as proper marking and labeling, are required.

Whole lamps are exempt from the Hazardous Waste (HW) manifest requirements, and a Bill of Lading (BOL) with a common carrier, instead of a certified hazardous waste hauler, is allowed for shipment if they are sent for recycling. ***No analytical testing or reporting of whole lamps is needed for recycling.*** Intentionally breaking lamps is defined as “treatment” and treatment of lamps, e.g. drum-top crushing, requires compliance with RCRA Subtitle C at an authorized facility. Therefore, contractors may not crush or treat lamps.

Contractors may charge a fee to collect lamps. They can also make arrangements with any authorized recycler and may be eligible for volume discounts. Recyclers will provide a recycling certificate to the contractor, who can pass it along to the generator.

Once contractors realize how easy it is to get lamps recycled, more and more will discover they can improve their bottom line by offering this service. Given the Commonwealth’s increased emphasis on proper disposal of mercury-added products, lamp recycling may represent an excellent opportunity for contractors seeking to expand their business.

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