

*Information for . . .*

## **Wholesale Electrical Distributors and Retailers of Energy Efficient Lighting**

### **Overview**

Any electrical wholesaler or retailer who sells energy-efficient lighting for buildings can assist the building owners and managers with lamp recycling. This presents distributors with a new business opportunity. Recycling services, typically in partnership with a recycling company, can be a new profit center, offered as a value-added service for better customer relations. 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.

In the US, most States have adopted a less burdensome set of regulations for dealing with hazardous waste (HW) lamps, by including them in the Universal Waste Rule (UWR)<sup>1</sup>. If lamps are sent for recycling, this rule simplifies the storage, record keeping and transportation requirements compared to handling them as hazardous wastes.

Whole lamps are exempt from the HW manifest requirements. A bill of lading (BOL) with a common carrier, instead of a certified hazardous waste hauler, is allowed for shipment if lamps are sent for recycling. No analytical testing or reporting of whole lamps is needed for recycling.

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.

If, however, you do accumulate spent lamps in your facilities, then UWR would define you as a “Handler”, and as such:

- Accumulation- can be for up to one year
- Transportation- can be done via common carrier
- Permitting – is not needed

More specifically, Handlers are categorized as follows:

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<sup>1</sup> The Federal UWR is codified at 40 CFR Part 273. Most state laws are consistent with this framework.

**Small Quantity Handler-** (SQHUW) - a generator or third party (contractor) who accumulates <5,000 kg at a time, and stores them up to one year. No EPA registration is required. Minimal training and information on handling mercury lamps and emergency procedures is required. Proper marking and labeling is required. SQHUW requirements are found at 40 CFR 273.10.

**Large Quantity Handler-** (LQHUW) - a generator or third party who accumulates >5,000 kg at a time, up to one year. EPA or state registration and ID# is required. Training and information on handling mercury lamps and emergency procedures is required. Proper marking and labeling is required. LQHUW requirements are found at 273.30.

**Transporter-** one who engages in the process of transporting UW lamps for <10 days. A transporter may not store or accumulate UW lamps. No EPA Registration is required. Proper marking and labeling is required. Transporter requirements are found at 273.50

## **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 components contain some combination of mercury and lead. Environmental considerations demand that everyone involved in a lighting retrofit project pay close attention to proper disposal.

In the US, if these products classify as hazardous waste, it is the responsibility of the **owner** to manage the waste correctly; and any **contractors involved 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](http://www.lamprecycle.org) website has information on lamp disposal and recyclers in Canada. Mexico has passed a version of the US 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 likely to be your customers, the contractors and building owners.

Potential exposure to mercury in lamps arises principally from lamp breakage. As the old lamps are removed for their sockets, they should be carefully packed to avoid breakage. The cartons supplied with new lamps can be re-used 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 accepted by recyclers and still qualify the shipment as a Universal Waste. A good starting point for finding the Massachusetts laws on this topic is <http://mass.gov/dep/recycle/hazwaste.htm>.

In general, careful handling of waste lamps will therefore minimize disposal costs. 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.

We also encourage you to set up recycling programs for the spent mercury-containing lamps in your own facilities.

For more information visit [www.lamprecycle.org](http://www.lamprecycle.org) or [www.almr.org](http://www.almr.org)

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