



State of Ohio Environmental Protection Agency

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November 24, 2004

[REDACTED]
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Re: Universe Waste Rule for Handlers of Lamps

Dear Mr. [REDACTED]

The Ohio EPA, Division of Hazardous Waste Management has adopted the universal waste rules for lamps. These rules have gone through the public rule making process and will be effective on December 7, 2004. We want to be certain that you are aware of these newly adopted rules which may affect your business. These rules include any lamps which exhibit a characteristic of a hazardous waste. Lamps are identified under the universal waste rules in Ohio Administrative Code (OAC) rule 3745-50-10(64) as the bulb or tube portion of an electric lighting device. In addition to adding lamps to the universal waste rules, we are now defining used lamps as spent materials and not characteristic by-products.

Lamps managed under the universal waste rules can be managed by three types of people who can accept and store universal waste (UW) lamps. These three types are small quantity handlers (<5,000 kilograms of UW), large quantity handlers (>5,000 kilograms of UW), and destination facilities. A destination facility is defined in the rules as a facility that stores lamps before they treat, dispose, or recycle a particular category of universal waste. Universal waste handlers include persons who generate, receive, or store, but do not treat, dispose or recycle UW generated elsewhere. If you are collecting lamps from other people, you can send them to another UW handler, or to a destination facility. You may also collect lamps from other people and store the lamps at your own site without a permit under the UW handler standards. A permit is required for any facility where UW is stored before being recycled at that facility.

After December 7, 2004, as a UW handler, you will be prohibited from picking up lamps which have been crushed. Customers who crush their lamps must send the crushed lamps directly to a facility with a Hazardous Waste Facility Installation and Operation Permit using a hazardous waste transporter. The UW rule prohibits UW handlers from crushing hazardous lamps.

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

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Generators who want to take advantage of the universal waste rules instead of the hazardous waste generator requirements, must comply with all applicable UW handler requirements. As we previously mentioned, you may crush your lamps if you are the generator, but then you must manage the crushed lamps as hazardous waste under OAC Chapter 3745-52. Lamps you have crushed may not be managed as a UW; they must be sent directly to a permitted hazardous waste facility by a hazardous waste transporter. If you choose to crush hazardous lamps after December 7, 2004, you may want to refer to the generator treatment requirements found in the guidance located at [www.epa.state.oh.us/dhwm/pdf/Generator Treatment Guidance](http://www.epa.state.oh.us/dhwm/pdf/Generator_Treatment_Guidance)

 Ohio EPA has changed their Web site. The new address is: www.epa.ohio.gov/portals/32/pdf/Generator_Treatment_Guidance.pdf

Guidance is available at our web page on the Universal Waste Rules for Handlers of Lamps, and you can read this guidance at  www.epa.ohio.gov/portals/32/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf
[http://www.epa.state.oh.us/dhwm/pdf/Universal Waste Rules](http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules)

Also, the newly promulgated universal waste rules for lamps will be effective on December 7, 2004 and can be found at  www.epa.ohio.gov/dhwm/laws_regs.aspx
<http://www.epa.state.oh.us/dhwm/rulesmegaset.html>.

If you have any questions about the Universal Waste Rule, or any other questions please contact either the Division of Hazardous Waste Management, Regulatory Services Unit at (614) 644-2917, or your District Office Hazardous Waste Inspector.

Sincerely,



Andy Kubalak
Regulatory Services Unit
Division of Hazardous Waste Management

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RSU, DHWM

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