



## Ohio's Universal Waste Rules: Are You Handling Used Lamps Correctly?

### Why should I be concerned about used lamps?

Many types of light bulbs, or lamps, contain mercury and other heavy metals such as lead or cadmium and should be carefully handled and disposed of when used. If the levels of mercury or other metals are high enough, some lamps may be considered hazardous waste by the Ohio EPA once they are spent.

### How do I know if my waste lamps are hazardous?

You must evaluate your lamps to determine if they are hazardous before you throw them in the trash. To determine if your waste lamps are hazardous you may:

- rely on the analytical data provided by the lamp manufacturer; provided that the lamps were tested for all relevant hazardous waste characteristics and the analytical data is current;
- have the lamps tested yourself by TCLP; or
- assume that the lamps are hazardous.

### What are my options for managing hazardous lamps?

If your lamps are hazardous, the easiest option is to manage them under Ohio's universal waste rules (UWR). Many businesses find that managing used lamps under the UWR involves fewer requirements and is easily implemented as part of their on-site recycling programs. If you don't manage your hazardous waste lamps as universal waste, you must send them to a permitted hazardous waste disposal facility and follow additional rules.

The flow chart on the following page can help you determine if you are handling your used lamps correctly. This chart is a starting point and should not be your only resource in understanding the regulations. It is not a substitute for reading the rules.

### If you are throwing your lamps in the trash you may be illegally disposing of hazardous waste.

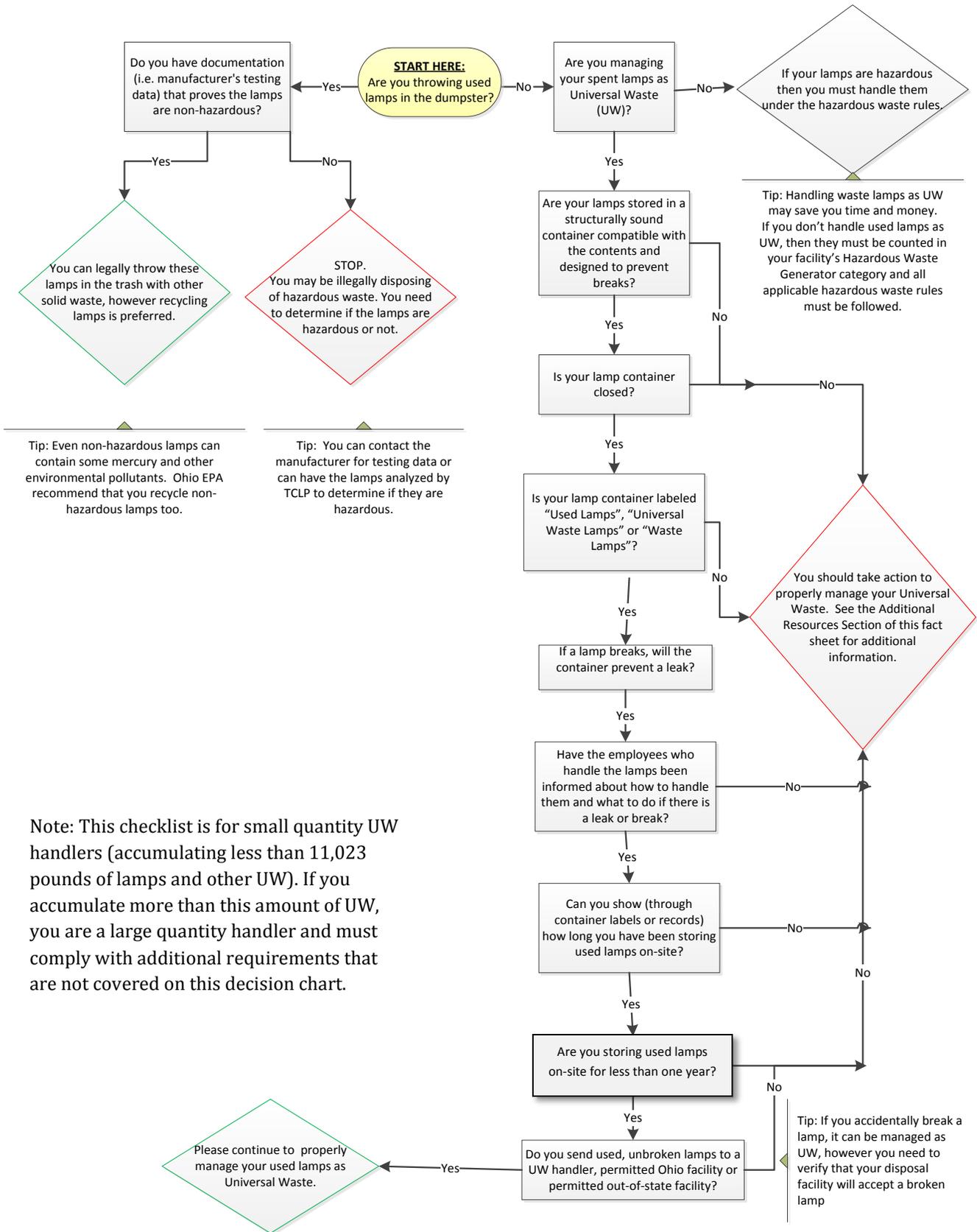
These types of lamps may be hazardous when spent:

- fluorescent;
- incandescent;
- metal halide;
- neon;
- high-intensity discharge;
- high-pressure sodium; and
- mercury vapor lamps

Managing your used lamps as universal waste is the easiest option since it:

- involves fewer requirements
- requires less labeling
- requires less recordkeeping
- allows for longer lamp waste accumulation as compared to managing used lamps under the hazardous waste rules.

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Note: This checklist is for small quantity UW handlers (accumulating less than 11,023 pounds of lamps and other UW). If you accumulate more than this amount of UW, you are a large quantity handler and must comply with additional requirements that are not covered on this decision chart.

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## Glossary

**Destination facility:** A permitted facility that treats, disposes of, or recycles universal waste.

**Small quantity universal waste handler:** Accumulates less than 5,000 kilograms (11,023 pounds) of universal waste (not by type) at any time.

**Large quantity universal waste handler:** Accumulates 5,000 kilograms (11,023 pounds) or more of universal waste (not by type) at any time.

**Toxicity Characteristic Leaching Procedure (TCLP):** The TCLP is an analytical procedure performed by a lab to determine whether a waste exhibits hazardous waste characteristics for specific toxic contaminants, such as heavy metals, pesticides and other organics. Mercury, lead, chromium and cadmium are some of the heavy metals regulated under the hazardous waste rules.

## Additional Resources

- Universal Waste Rules for Handlers of Lamps (Ohio EPA) — [epa.ohio.gov/portals/32/pdf/Universal\\_Waste\\_Rules\\_for\\_Handlers\\_of\\_Lamps.pdf](http://epa.ohio.gov/portals/32/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf)
- Summary Table of Universal Waste Handling Requirements (Ohio EPA) — [epa.ohio.gov/portals/32/pdf/UniversalWasteRequirementsTable.pdf](http://epa.ohio.gov/portals/32/pdf/UniversalWasteRequirementsTable.pdf)
- List of Computer, Fluorescent Lamp and Ballast Recyclers (Ohio EPA) — [epa.ohio.gov/portals/32/pdf/comp.lamp.ballast.list.pdf](http://epa.ohio.gov/portals/32/pdf/comp.lamp.ballast.list.pdf)
- Ohio EPA, Division of Materials and Waste Management, Additional Web Resources on Fluorescent Lamps — [epa.ohio.gov/dmwm/Home/HWFluorescentLamps.aspx](http://epa.ohio.gov/dmwm/Home/HWFluorescentLamps.aspx)
- Ohio EPA, Office of Compliance Assistance and Pollution Prevention — [epa.ohio.gov/ocapp](http://epa.ohio.gov/ocapp)
- Identifying Your Hazardous Waste (Ohio EPA) — [epa.ohio.gov/portals/41/sb/publications/identifyingwaste.pdf](http://epa.ohio.gov/portals/41/sb/publications/identifyingwaste.pdf)