



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

April 30, 1993

Mr. Steven D. Murphy
Lead Planning Analyst
State of Connecticut
Office of Policy and Management
80 Washington Street
Hartford, CT 06106-4459

Dear Mr. Murphy:

It was a pleasure to meet you at EPA Region I's Environmental Awards Ceremony. Your inquiry on federal regulation of fluorescent light bulbs under the Resource Conservation And Recovery Act (RCRA) is an important issue in a very complex area of environmental regulation.

It is my understanding that the condition of the light bulbs and their intended disposition are important factors in whether certain federal RCRA regulations apply. For example, under federal law spent (non-working) fluorescent light bulbs to be discarded are a RCRA regulated solid waste. Therefore, these bulbs must undergo a hazardous waste determination before disposal. This determination can be made either through knowledge of the materials contained in the light bulbs or by testing them through application of the Toxicity Characteristic Leaching Procedures (TCLP) (see 40 CFR Part 262.11).

If the bulbs are in working condition and are to be recycled, they are not subject to regulation under RCRA. However, if working light bulbs are to be discarded, they are subject to the same requirements as set out in the preceding paragraph. Finally, fluorescent light bulbs from residential (household) sources only, and which are recycled, are not regulated under RCRA. The residential sources of these light bulbs must be demonstrated.

You should note that Small Quantity Generators (SQGs) of hazardous waste are afforded certain exemptions from federal RCRA standards. Under federal law, a Small Quantity Generator (SQG) may generate no more than a total of 220 pounds of hazardous waste per month (see 40 CFR Part 260.10). As you are aware, states may have additional requirements.



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EPA Headquarters has organized a Fluorescent Light Workgroup to evaluate available information on fluorescent lights and to make recommendations for EPA action. The contact for this workgroup is Ms. Charlotte Mooney. She may be reached at (202) 260-6926.

I hope this information has been helpful. If I may be of any additional assistance please contact me at (617) 565-3402 or John Smaldone, my Special Assistant, at (617) 565-9125.

Sincerely,



Paul G. Keough
Acting Regional Administrator

cc: Deborah Brown, ORC
Ken Rota, WMD