

Regulatory Status of Fluorescent Lamps

Under federal and state regulations, commercial and industrial entities are required to determine whether mercury-containing lamps, including compact fluorescents, that are destined for disposal are classified as a hazardous waste. Households, however, are exempt from these regulations.

A lamp is considered a hazardous waste if it exhibits the characteristic of hazardous waste toxicity. Generators can determine whether a lamp exhibits the toxicity characteristic for mercury by using the Toxicity Characteristic Leaching Procedure to test the lamp or by receiving documentation from the lamp manufacturer, distributor, vendor or other reliable source.

Lamps that pass the TCLP are not hazardous and, therefore, are not subject to federal or state hazardous waste regulations. These lamps can be shipped to a recycler as non-hazardous waste or sent to a municipal landfill if the landfill accepts them.

If a generator cannot demonstrate that waste lamps are non-hazardous, they must be managed as any other hazardous waste, including shipment to a recycler as hazardous waste, or they can be managed as universal waste.

The consolidation of hazardous waste lamps via the process of crushing is considered treatment. Generators may crush lamps on-site in closed containers. However, the crushed lamps are then considered to be a fully-regulated hazardous waste.

Generators should contact N.C. Division of Waste Management at (919) 707-8200 with all questions related to the regulatory status of fluorescent lamps.

N.C. DEQ strongly encourages all generators, including households, to recycle all lamps containing mercury, regardless of their regulatory status.