

When can an MRW facility crush CESQG / HHW fluorescent lamps? *

Many Moderate Risk Waste (MRW) facilities collect fluorescent lamps from conditionally exempt small quantity generators (CESQGs) as well as from households. Some MRW facilities are exploring the idea of crushing lamps on-site prior to sending them off-site for final management.

CESQG and Household Hazardous Waste (HHW) are regulated differently. CESQGs have different options to manage their waste lamps. CESQGs can choose to direct their waste lamps to the following types of facilities:

1. Universal Waste (UW) destination facility as UW [WAC 173-303-070(8)(b)(iii)(H)].
2. MRW facility as MRW [WAC 173-303-070(8)(b)(iii)(C)].
3. Facility for management as dangerous waste (DW).

General Information

Universal waste is a category of dangerous waste.

Fluorescent lamps are a type of universal waste lamp [WAC 173-303-573(5)].

Lamps generated from households are excluded from being regulated as dangerous waste [WAC 173-303-071(3)(c)] or universal waste.

Lamp Crushing: Universal Waste Lamps

If waste lamps are received by an MRW facility as UW, no crushing would be allowed. Crushing is considered treatment in relation to lamp management. For an MRW facility to accept and crush UW lamps, they would need a Treatment, Storage, Disposal (TSD) permit.

Why is a TSD permit required?

1. Only UW destination facilities can treat UW [WAC 173-303-573(7)(b), (18)(b) and -040)].
2. Crushing is treatment.
3. To treat UW, a TSD (173-303-800) permit is required [173-303-573(35)(a)].

An MRW facility can only accept and accumulate UW as a UW handler. Universal waste handlers cannot treat UW. An MRW facility cannot receive UW from a generator and then call it DW (non-UW) later on in order to crush this waste because the waste would not have been managed as DW by the generator. Dangerous waste must be counted at the point of generation, which may or may not change the generator's status as a CESQG. If an MRW facility accepts lamps as UW and then calls it DW, they would be putting the generator into non-compliance with the DW regulations.

Once the generator has claimed their waste to be UW, the waste must maintain that status until it gets to a final UW destination facility (grave). An MRW facility can become a UW destination facility that crushes lamps as a form of treatment,

however, they would need to keep managing UW as UW and receive a TSD final facility permit [173-303-573(35)(a)].

If an MRW facility wishes only to collect, not treat, UW, they would need to notify the Department of Ecology and obtain an EPA ID# as a large quantity handler of UW *“before meeting or exceeding the 11,000 pound storage limit of all UW other than lamps and/or before meeting or exceeding the 2,200 pound storage limit for lamps”* [WAC 173-303-573(19)]. This assumes the facility would exceed the storage limit to qualify as a small quantity handler.

Only permitted UW destination facilities are the permitted grave where CESQG UW handlers / generators can send their universal waste for treatment [173-303-070(8)(b)(iii)(H)]. In this circumstance the waste is not managed, counted, etc. as DW at the point of generation.

Lamp Crushing: CESQG Waste Lamps Managed as Dangerous Waste

If an MRW facility collects lamps from CESQGs as DW, the MRW facility would be allowed to crush those lamps if the crushing activity is identified in their WAC 173-350-360 solid waste permit.

Permitted MRW facilities are the permitted grave where CESQGs can send their dangerous waste [173-303-070(8)(b)(iii)(C)]. In this circumstance the waste is managed, counted, etc. as DW at the point of generation, which does not put the CESQG out of compliance with the DW regulations.

Lamp Crushing: Household Hazardous Waste Lamps

As mentioned above, lamps generated from households are excluded from being regulated as DW. An MRW facility would be allowed to crush lamps generated from households, provided the facility was permitted under their WAC 173-350-360 solid waste permit for that activity.

As with other wastes managed at MRW facilities, waste lamps from households may be crushed and then combined with lamps crushed and managed as DW from CESQGs.

Questions?

For questions about the Dangerous Waste Regulations, **contact Tom Cusack at (360) 407-6755.**

Need more information about requirements for Universal Waste Handlers?

These publications are available from the Internet:

[*Universal Waste Rule for Batteries and Mercury-Containing Thermostats*](#)

and

[*Universal Waste Rule for Dangerous Waste Lamps.*](#)

Definitions:

CESQG	Conditionally Exempt Small Quantity Generator
DW	Dangerous Waste
HHW	Household Hazardous Waste
MRW	Moderate Risk Waste
TSD	Treatment, Storage, Disposal
UW	Universal Waste

*** NOTE:** The answers provided to *Frequently Asked Questions* are guidance for implementing WAC 173-350-360. Following this guidance is not a requirement of operation or design for MRW facilities, as facilities may meet regulatory requirements through other means. Local Health Departments should be consulted to determine what will be sufficient to meet the regulatory standards.