



# State of Louisiana

## Department of Environmental Quality



M.J. "MIKE" FOSTER, JR.  
GOVERNOR

J. DALE GIVENS  
SECRETARY

December 6, 2000

Mr. Art Shilling  
Lamp Recyclers of Louisiana Incorporated  
P.O. Box 2962  
Hammond, LA 70404-2962

Re: Drum top crusher.

Dear Mr. Shilling:

The Department is in receipt of your letter dated March 24, 2000, requesting clarification of the Universal Waste Rule as it pertains to fluorescent lamps (lamps).

The following are answers to your questions/comments:

- A) Waste determinations as specified in LAC 33:V.1103 are not necessary on (intact) lamps that are managed as a universal waste in accordance with LAC 33:V.Chapter 38. Lamps (intact) that are managed as universal waste may be shipped with a standard bill of lading shipping document.
- B) Lamps incidentally broken at the handler site, which are properly contained in packaging that will minimize the release of lamp fragments and residues, may continue to be managed as a universal waste. These lamps may be shipped with a standard bill of lading shipping document and are not required to be shipped with a hazardous waste manifest.
- C) When lamps are intentionally crushed at the handler/generator site by use of a drum top crusher, the crusher must be operated in an environmentally sound manner to prevent release of any hazardous waste or hazardous waste constituents into the environment. According to LAC 33:V.3817 and LAC 33:V.3839 handlers of universal waste are prohibited from diluting or treating universal waste. Therefore, when a universal waste handler crushes his/her own lamps in a drum top crusher, he/she would be considered to be treating a (potentially) hazardous waste (instead of a universal waste). In this case, once the lamps are crushed they no longer meet the definition of a universal waste lamp and can not be managed as a universal waste. A generator can treat his/her own hazardous waste provided that it is conducted in a less than 90-day container or tank, and (as mentioned earlier) in an environmentally sound manner. Otherwise, a standard permit must be obtained for the treatment of hazardous waste.



A hazardous waste determination in accordance with LAC 33:V.1103 must be performed on (intentionally) crushed lamps prior to shipment for recycling or disposal. Filters of drum top crushers may be considered hazardous waste and are subject to a hazardous waste determination in accordance with LAC 33:V.1103.

Employees whose duties involve hazardous waste management (including hazardous waste generated from drum top crushers) must be trained in accordance with LAC 33:V.Subpart 1.

A lamp generator may designate lamps as destined for recycling prior to the on-site use of a drum top crusher if the materials resulting from the crushing will be recycled, but this designation is not required. However, materials resulting from the crushing operation are subject to a hazardous waste determination in accordance with LAC 33:V.1103, and must be managed in accordance with all applicable state and federal regulations.

If you should have any further questions regarding this matter, please contact Ms. Roselle Foote at (225) 765-2965. Thank you.

Sincerely,



R. Bruce Hammatt  
Administrator  
Enforcement Division

RBH/RSF

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