Advisory: Drum-Style Fluorescent Lamp Crushers

Drum-style fluorescent lamp crushers (usually mounted on a 55-gallon drum) have been marketed to municipalities and businesses, with claims of saving money (compared with the cost of recycling lamps) and space (less required to store lamps for pickup).

When assessing this type of equipment, please note that effective November 15, 2019, MassDEP amended its hazardous waste regulations and now requires all generators of hazardous waste, including Very Small Quantity Generators (VSQGs), to obtain a hazardous waste treatment license to crush fluorescent lamps in drum top crushers (DTCs).

Previously VSQGs could use DTCs without a hazardous waste treatment license. DTCs purchased on or after the effective date of these regulations cannot be operated by a VSQG without a license to treat hazardous waste. One year after November 15, 2019, VSQGs that owned a DTC on the effective date of these regulations will have to obtain a license to continue operating their drum top crusher.

Generators who operate drum-style crushers that do not comply with the recycling requirements or are not properly permitted or licensed may be subject to enforcement action.

New regulatory language at 310 CMR 30.353(10)(f):

On and after November 15, 2019, a Very Small Quantity Generator shall not newly acquire and utilize a drum-top crusher to crush mercury-containing lamps without first obtaining a license to treat hazardous waste. One year after November 15, 2019, a Very Small Quantity Generator that acquired a drum top crusher prior to November 15, 2019 may not continue to utilize the drum top crusher to crush mercury-containing lamps without obtaining a license to treat hazardous waste.

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