

US EPA ARCHIVE DOCUMENT

DCN FLEP-00006

COMMENTER Owens Brockway Glass Container Inc.

SUBJECT BAK

COMMENT Owens Brockway Glass Container Inc. is pleased to submit the following comments with regards to Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps; Proposed Rule that appeared in the July 27, 1994 Federal Register.

DCN SCSP-00009

COMMENTER Niagara Mohawk Power Corporation

SUBJECT BAK

COMMENT NMPC is an investor owned electric and gas utility, providing energy to the largest customer service area in New York State. Our integrated electric system, covering approximately 24,000 square miles and all or part of 37 counties and 669 towns, villages and cities, extends from Lake Erie to New England's borders, from Canada to Pennsylvania. NMPC serves over 1.5 million residential, commercial and industrial customers. Electrical generation is supplied by hydroelectric, coal, oil, natural gas fired and nuclear generating units, as well as through purchase contracts with other utilities and independent power producers. NMPC's 18 fossil fired units provide over 3500 megawatts of generating capacity representing approximately 48% of the Corporation's total electric capability. NMPC generates a variety of waste streams of which include batteries and pesticides. As such, NMPC will be directly affected by the proposed regulations which are the subject of these comments.

DCN FLEP-00011

COMMENTER General Motors

SUBJECT BAK

COMMENT In response to the "Federal Register" notice of July 27, 1994, (59 FR 38288) and request for comment on the notice of proposed rulemaking on "Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps", General Motors Corporation (GM) wishes to submit the following comments for consideration by EPA.

DCN FLEP-00014

COMMENTS Diversey Corporation

SUBJECT BAK

COMMENTS Diversey Corp. is a formulator and packager of cleaning and sanitizing agents for commercial and industrial applications with six operating plants in the United States. Diversey Corp. respectfully submits the following comments for consideration regarding the Proposed Rule for Hazardous Waste Management System; Modification of the Hazardous Waste Program: Mercury Containing Lamps. Diversey Corp. as with many other companies use a large number of fluorescent lamps to illuminate various workplaces.

DCN SCSP-00014

COMMENTS Miles, Inc.

SUBJECT BAK

COMMENTS Miles Inc. is pleased to submit these comments on EPA's proposed rulemaking entitled, "Hazardous Waste Management System: Modification of the Hazardous Waste Recycling Regulatory Program", [FRL-3982-3]. Miles Inc. is a Fortune 100, research-based company with businesses in chemicals, health care and imaging technologies. Headquartered in Pittsburgh, Pennsylvania, the company has major operations throughout North America, with 1991 sales of \$6.2 billion. The company employs nearly 30,000. Miles is a member of the Chemical Manufacturers Association and the Pharmaceutical Manufacturers Association. Accordingly, Miles incorporates by reference the comments on the proposed rule made by those associations. Miles is committed to pollution prevention and has an aggressive waste minimization program. Miles is a signatory to the Responsible Care [Footnote: Responsible Care is a registered trademark of the Chemical Manufacturers Association.] code and has made a corporate commitment to EPA's voluntary pollution prevention initiative, the "33/50" program. While Miles continues to strive to minimize waste generation, it is committed to responsible waste management. Miles supports EPA's effort to create a national waste management program which promotes the allocation of resources to management of wastes in accordance with the risk posed by the waste. To assist EPA in this important effort,

Miles is providing comments on specific issues raised in the proposed rule. Miles hopes these comments will be utilized by EPA in developing the most cost effective and environmentally responsible waste management program possible.

DCN FLEP-00015
COMMENTS USPCI
SUBJECT BAK

COMMENT USPCI, Inc. , is a wholly owned subsidiary of Union Pacific corporation. USPCI, through its wholly owned subsidiary corporations, engages in the remediation, transportation, treatment and disposal of solid and hazardous wastes, including mercury containing lamps.

DCN FLEP-00020
COMMENTS Deere and Company
SUBJECT BAK

COMMENT Deere & Company is one of the world's largest manufacturers of farm, construction, and lawn and grounds care equipment with fourteen factories in the U.S. and numerous warehouse and office locations. All generate mercury-containing lamps for disposal.

DCN SCSP-00021
COMMENTS NYNEX
SUBJECT BAK

COMMENT This comment is submitted on behalf of the NYNEX Corporation (NYNEX), the parent of New York Telephone and New England Telephone and Telegraph companies. NYNEX appreciates the opportunity to comment on the proposed rule for the Hazardous Waste Special Collection Program which was published at 58 Federal Register 8101 on February 11, 1993.

DCN FLEP-00022

COMMENTER Cooper Industries

SUBJECT BAK

COMMENT Houston-based Cooper Industries, with 1993 revenues of \$6.3 billion, is a diversified, worldwide Fortune 100 manufacturer of electrical products, electrical power equipment, tools and hardware, automotive products, and petroleum and industrial equipment. A 160-year-old company, it employs over 40,000 people in the United States. Cooper currently has over 150 facilities in the United States that use mercury-containing lamps. The types of facilities include: manufacturing plants, service shops, distribution centers, and administrative offices. The number of lamps each facility uses annually ranges from less than 10 to over 2,500. Cooper is an active participant in the Green Lights program. Our Cooper Lighting Division recently received the Manufacturing Ally of the Year award from Carol Browner. This award recognizes the division for providing innovation in lighting technologies and services to customers, and for aggressively and effectively promoting the Green Lights program.

DCN SCSP-00022

COMMENTER MRT System

SUBJECT BAK

COMMENT Information about the MRT battery process MRT System AB is a Swedish Company which was founded nearly 15 years ago with the purpose of developing, manufacture and sell systems for mercury recovery from spent mercury containing products. MRT stands for Mercury Recovery Technology. Some of its history and a reference list of sold systems are find in Annex No. 1. As MRT is one of the main players in the world, able to provide reliable and well proven systems for mercury recovery, we highly appreciate that US EPA take action in modifying the Hazardous Waste Regulatory Program. I judge it of great importance, not only for the US, but also for other parts of the world that US EPA determine harmful universal waste and set regulations how to deal with spent mercurial products. After having studied the Federal register document, I understand that regulations with regards to collection and recycling of batteries and the thermostats will take place. In my comments set forth, I will not comment that

further as I fully agree with the approach by US EPA However, for your information, I enclose a description of our technology in Annex No. 7, which confirms that well proven technology is available to deal with such high mercury contaminated waste.

DCN FLEP-00023

COMMENTER Kmart Corporation

SUBJECT BAK

COMMENT Kmart Corporation, as a national discount retailer, operates approximately 2,300 facilities throughout the United States.

Other than routine single lamp replacements, scheduled facility re-lamping, occurs every 18 to 26 months depending on the facility's size.

DCN FLEP-00026

COMMENTER Thomas Industries, Inc.

SUBJECT BAK

COMMENT Thomas Industries is a manufacturer of Incandescent, Fluorescent and High Intensity Discharge lighting fixtures. Thomas Industries has approximately 2,550 employees with manufacturing facilities in California, Illinois, Kentucky, Mississippi, New York and Tennessee, with approximately 1.8 million square feet of space.

DCN SCSP-00027

COMMENTER Georgia Dept. of Natural Resources

SUBJECT BAK

COMMENT Attached are comments from the Georgia Environmental Protection Division, Hazardous Waste Management Branch on the proposed EPA rule regarding Modification of the Hazardous Waste Recycling Regulatory Program published in the Federal Register dated Thursday, February 11, 1993,.40 CFR Parts 260-262, 264-265, 268, 270 and 273.

DCN FLEP-00028

COMMENTER Institute of Real Estate Mgmt.

SUBJECT BAK

COMMENT On behalf of the 9,400 members of the Institute of Real Estate Management (IREM) a NATIONAL ASSOCIATION OF REALTORS affiliate of professional property managers -- we are writing to you today regarding the EPA proposed rule on Mercury-Containing Lamps.

DCN FLEP-00029

COMMENTER Texaco, Inc.

SUBJECT BAK

COMMENT Texaco appreciates this opportunity to submit comments on the Environmental Protection Agency's ("EPA") proposed rule "Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps". 59 Federal Register 38288 (July 27, 1994). Texaco owns and operates various office buildings and petroleum refining and distribution facilities which will be affected by the final outcome of this proposed rule.

DCN FLEP-00031

COMMENTER Potomac Electric Power Co.

SUBJECT BAK

COMMENT The following comments in response to EPA's proposed rule in Docket Number F-94-FLEP-FFFFF, Modification of the Hazardous Waste Program; Mercury-Containing, Lamps, Proposed Rule 59 Fed. Reg. 38288 (July 27, 1994), are submitted on behalf of the Potomac Electric Power Company ("Pepco"). Pepco is an investor-owned electric utility serving the District of Columbia, and most of Montgomery and Prince Georges Counties in Maryland. Pepco also provides electricity to the Southern Maryland Electric Cooperative, Inc., (SMECO) which serves Charles, St. Mary's and Calvert Counties, Maryland.

DCN FLEP-00032

COMMENTER Niagara Mohawk

SUBJECT BAK

COMMENT On July 27, 1994, the Environmental Protection Agency published in the Federal Register a proposed rule covering modifications to the Hazardous Waste Program as it relates to Mercury Containing Lamps. Niagara Mohawk Power Corporation (NMPC) has reviewed this proposal and is including, in triplicate, copies of our comments on this proposal. NMPC is an investor owned utility that serves a customer population of 3.5 million, spread across 24,000 square miles of service territory. NMPC owns and operates four fossil fuel fired electric generating plants. NMPC is in an attempt to improve its energy efficiency measures both within its facilities and in customers' facilities, frequently changes out mercury containing lamps. Thus, the implications of the proposed rule to NMPC are of concern. NMPC's comments on this proposed rule are discussed below.

DCN SCSP-00032

COMMENTER Oklahoma Gas and Electric

SUBJECT BAK

COMMENT Oklahoma Gas and Electric Company appreciates the opportunity to submit comments on the Hazardous Waste Management System; Modification of the Hazardous Waste Recycling Regulatory Program; Proposed Rule. Oklahoma Gas and Electric Company is an independent investor owned electric utility. OG&E provides electric service to both commercial and residential customers in a 30,000 square mile area in Oklahoma and western Arkansas. The total population of our service territory is 1.4 million people. OG&E has a total generating capacity of 5,655 megawatts. There are several different types of facilities at OG&E. These include small and large service centers, generating stations, accounting offices and corporate office buildings. The service centers may have vehicle maintenance garages, electrical equipment maintenance shops, paint booths, fabrication shops and pole yards. Generating stations may have their own vehicle maintenance garages and electricity generating equipment such as boilers, generators, turbines and coal handling equipment. The accounting offices are sales oriented and the corporate office buildings are staff offices. There are a variety of facilities

across our 30,000 square miles of service territory.

DCN FLEP-00033

COMMENTER Brown and Caldwell

SUBJECT BAK

COMMENT If you have any questions or comments, please contact me at (503) 244-7005.

DCN FLEP-00034

COMMENTER Leaseway Transportation Corp.

SUBJECT BAK

COMMENT Leaseway Transportation Corp. ("Leaseway") is a Corporation holding and management company which controls the stock of approximately 65 companies involved in various aspects of the transportation industry. These companies manage operations at about 200 locations. Of these companies, 30 are regulated trucking companies providing contract and common carriage for a variety of shippers, including shippers in the auto, retail, grocery, appliance and forest products industries. Aggregate revenues from all operations during 1993 were approximately \$625 million. Due to the varied nature of Leaseway's operations, its facilities range in size from a single bay service facility with one mechanic, to maintenance facilities of over 50,000 square feet with as many as 30 mechanics. Therefore, in managing its operations, Leaseway experiences problems typical of a small business as well as those typical of a large company. The transportation industry is highly competitive and profit margins are extremely small.

DCN FLEP-00034

COMMENTER Leaseway Transportation Corp.

SUBJECT BAK

COMMENT Thank you for your consideration of our comments.

DCN SCSP-00034

COMMENTER Dept. of the Army (AEHA)

SUBJECT BAK

COMMENT Reference Environmental Protection Agency, Proposed Rule for Hazardous Waste Management System; Modification of the Hazardous waste Recycling Program, Federal Register, Vol. 58, No. 27, Thursday, February 11, 1993, Pages 8101-8133. In response to the EPA's request for comment on the subject proposed rule, the-Hazardous and Medical Waste Branch of the U.S. Army Environmental Hygiene Agency, Waste Disposal Engineering Division has enclosed comments and recommendations on selected issues. The document was reviewed by the following personnel: Ms. Veronique Hauschild, Mr. Richard Price, Mr.,Dave Davis, and Ms. Linda Baetz. Additional comments and information were provided by Mr. Lou Souffer of the U.S. Army communication and Electronics Command. The point of contact is Ms. Linda Baetz at (410) 671-3652. Additional comments or concerns may be directed to me at (410) 671-3652.

DCN FLEP-00035

COMMENTER United States Postal Service

SUBJECT BAK

COMMENT The United States Postal Service submits its comments on the proposed rule, 59 FR 38288, concerning mercury containing light bulbs.

DCN FLEP-00037

COMMENTER Central Iowa Power Cooperative

SUBJECT BAK

COMMENT Re: Mercury-containing Lamps, Docket No. F-94-FLEP-FFFFF To Whom It May Concern: This letter is our written public comment on your proposal published in the July 27, 1994, Federal Register to exclude mercury-containing lamps from the definition of RCRA hazardous waste so long as they are sent to permitted municipal landfills or recycling facilities, or to add them to the Universal Waste Proposal. Central Iowa Power Cooperative is a Generation and Transmission cooperative owned by 16 member electric cooperatives in Iowa.

DCN FLEP-00037

COMMENTER Central Iowa Power Cooperative

SUBJECT BAK

COMMENT sincerely, CENTRAL IOWA POWER COOPERATIVE Vern Matheny
Environmental and Safety Coordinator pcd

DCN FLEP-00038

COMMENTER US West Business Resources, Inc.

SUBJECT BAK

COMMENT The following comments are submitted on behalf of US WEST, Inc. and its subsidiaries in response to the proposed rule making: Hazardous Waste Management Systems: Modification of the Hazardous Waste Program, Mercury Containing Lamps. The primary business activity of US WEST is provision of telecommunications services as a regulated utility in fourteen western states. The largest subsidiary of US WEST is US WEST Communications, a company with approximately 50,000 employees and 5,000 buildings, which provides local telecommunication services. Other smaller subsidiaries are involved in activities which include directory publishing, printing, and transportation.

DCN FLEP-00038

COMMENTER US West Business Resources, Inc.

SUBJECT BAK

COMMENT If you have any questions or require additional information, please contact me at 503 663-0699.

DCN FLEP-00040

COMMENTER Eli Lilly and Company

SUBJECT BAK

COMMENT United States Environmental Protection Agency Rulemaking, 'Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps": 59 Fed. Reg. 38,288 (July 27,1994) Dear Sir/Madam: Enclosed are the original and two copies of the comments of Eli Lilly and Company on the

above matter. Please contact me at (317) 277-1094 if there are questions concerning these comments.

DCN FLEP-00040

COMMENTS Eli Lilly and Company

SUBJECT BAK

COMMENT Eli Lilly and Company ("Lilly") is a research-based corporation that develops, manufactures, and markets pharmaceuticals and animal health products. Lilly generates a variety of wastes and recyclable materials in connection with its operations and is a Participant in EPA's Green Lights program. Lilly submits the following comments in response to the Environmental Protection Agency's ("EPA") July 27, 1994 notice of the Proposed rule and request for comments on "Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps" 59 Fed. Reg.38288.

DCN FLEP-00042

COMMENTS Entergy Services, Inc.

SUBJECT BAK

COMMENT The following comments in response to "Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps; Proposed Rule" (59 Fed. Reg. 38288 (July 27, 1994)), Docket No. F-94-FLEP-FFFFF, are submitted on behalf of Entergy Corporation, hereafter referenced as Entergy. Entergy Corporation and its subsidiary companies serve 2.3 million electric customers and include Arkansas Power & Light Company, Louisiana Power & Light Company, Mississippi Power and Power & Light Company, New Orleans Public Service, and Gulf States Utilities Company.

DCN FLEP-00043

COMMENTS Ohio Edison Company

SUBJECT BAK

COMMENT We appreciate the opportunity to submit comments on this proposal, and we hope they will be both informative and helpful toward making your final decisions regarding the management of

lighting wastes. If you have any questions, please contact me at (216) 384-5753. Sincerely, Howard C. Couch, P.E. Manager, Environmental and Special Projects Department ERH:mg

DCN SCSP-00043

COMMENTER Eugene Water and Electric Board

SUBJECT BAK

COMMENT I am writing in support of the above referenced proposed rule. I work as an Environmental Specialist for the Eugene Water & Electric Board (EWEB), a publicly owned water and electric utility that is a conditionally exempt generator of hazardous waste. Hazardous wastes generated by EWEB are disposed of at permitted hazardous waste disposal facilities. However, I realize that this practice is not common to all CEGs and that a large amount of waste is disposed of in local landfills.

DCN FLEP-00044

COMMENTER Solid Waste Association of North America

SUBJECT BAK

COMMENT The Solid Waste Association of North America is a non-profit educational organization of solid waste management professionals. The vast majority of our membership are local government units and the employees of local government units with the responsibilities for managing municipal solid waste management systems. Our private sector members are the companies and organizations that provide equipment, systems and services to the public sector. Our membership represents over 5,000 individuals, 650 local government units in 35 states and over 500 companies; all involved in the field of municipal solid waste management.

DCN FLEP-00046

COMMENTER American Public Power Association

SUBJECT BAK

COMMENT These are the American Public Power Association's comments on the U.S. Environmental Protection Agency's proposed rules governing lighting waste. The proposed regulation is found at 59 Federal Register 38288- 90, July 27, 1994. The American Public Power Association (APPA) is the national service association representing 1,750 publicly owned electric utilities. Most public power electric utilities are owned by cities, with others owned by states, counties, public utility districts, irrigation

districts, and all of the U.S. territories. Being publicly owned, all operate on a not-for-profit basis, with control over policy and service in local public hands. APPA members provide the electric power needs of 35 million Americans.

DCN FLEP-00048

COMMENTER Sullivan & Ward, P.C.

SUBJECT BAK

COMMENT This letter is our written public comment on your proposal published in the July 27, 1994 Federal Register to exclude mercury- containing lamps from the definition of RCRA hazardous waste so long as they are sent to permitted municipal landfills or recycling facilities, or to add them to the Universal Waste Proposal. I represent rural electric cooperatives in Iowa, and this written public comment is made on their behalf.

DCN FLEP-00051

COMMENTER Scientific Consulting Laboratories, Inc.

SUBJECT BAK

COMMENT This letter reflects the views of Scientific Consulting Laboratories, Inc. in the above referenced matter. Our firm has developed a mercury recycling unit designed to recover elemental mercury from mercury contaminated soil around natural gas pipeline metering stations. We intend to modify this system to provide economical mercury recovery to the mercury containing lamp recycling industry.

DCN FLEP-00053

COMMENTER Occidental Chemical Corporation

SUBJECT BAK

COMMENT Occidental Chemical Corporation (OxyChem) is pleased to submit comments on the United States Environmental Protection Agency's (USEPA's) proposed rule aimed at creating special management standards for mercury-containing lamps under RCRA. OxyChem is a diversified manufacturer of industrial and specialty chemicals, with 45 facilities located in the United States. A number of OxyChem facilities generate mercury-containing lamps and would be impacted by EPA's proposal.

DCN FLEP-00056

COMMENTER International Paper Company

SUBJECT BAK

COMMENT International Paper Company appreciates the opportunity to comment on the Agency's proposed alternative approaches for regulating mercury containing lamps. We routinely generate large quantities of spent lamps at our manufacturing, warehousing, and distributor/retail facilities and the cost of disposal of this waste stream appears to be totally out of proportion with the threat these wastes pose to the environment. International Paper is the largest forest products company in the world. Its twenty-six pulp and paper manufacturing facilities and hundreds of other business locations spend in excess of \$100,000 per year to manage waste lamps as hazardous wastes.

DCN FLEP-00056

COMMENTER International Paper Company

SUBJECT BAK

COMMENT Once again, thank you for the opportunity to express our views on this issue. Should you have questions on the above or desire further information, feel free to contact Tim Saylor at 901-763-6821. He will be glad to assist you.

DCN FLEP-00062

COMMENTER Phillips Petroleum Company

SUBJECT BAK

COMMENT On behalf of Phillips Petroleum Company (Phillips), we are pleased to provide comments, as requested by the U.S. Environmental Protection Agency (EPA or Agency), relating to its proposed rulemaking concerning alternative waste management practices for mercury-containing lamps. Phillips is an integrated petroleum company with exploration, production, transportation, refining, petrochemical and marketing operations. In the course of our business, we generate a variety of wastes including mercury-containing bulbs. As a member of EPA's voluntary "Green Lights" program since 1990, this rulemaking has particular significance to us as the cost of disposal affects the economics of relamping projects.

DCN FLEP-00064

COMMENTER Southern company Services, Inc.

SUBJECT BAK

COMMENT The Southern Company is the parent firm of six electric utilities. The operating company affiliates include Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company, Southern Nuclear Operating Company, and Savannah Electric and Power Company. The Southern Company is one of the largest investor-owned electric utilities in the nation, serving over 10 million people in four Southeastern states.

DCN FLEP-00066

COMMENTER Delmarva Power and Light Company

SUBJECT BAK

COMMENT Delmarva appreciates the opportunity to comment on the proposed rule concerning mercury-containing lamps. If you have any comments or questions regarding the above, please contact me, or Dwayne Olivieri, of my staff, at 302-452-6037.

DCN FLEP-00068

COMMENTER H.B. Fuller Company

SUBJECT BAK

COMMENT This is in response to the Agency's request for comments regarding the proposed rule (59 FP 38288) on Mercury-Containing Lamps. We are a specialty chemical company primarily producing adhesives, sealants, and coatings. We operate 52 office, warehouse, and production facilities in the U.S. within 21 states. These production facilities vary in size, but few facilities during normal lamp replacement would exceed the 350-lamps-per-month generator threshold for regulation under the proposed rule.

DCN FLEP-00070

COMMENTER Univ. of Texas Office of Env. Affairs

SUBJECT BAK

COMMENT Enclosed is an original and two copies of comments regarding the EPA's proposed modification to discontinue managing

mercury-containing lamps as hazardous waste. These comments are made on behalf of The University of Texas System ("UT") and its 15 component institutions--9 academic institutions and 6 health-related facilities, a list of which is attached.

DCN FLEP-00074

COMMENTER Dextrite, Inc.

SUBJECT BAK

COMMENT As a manufacturer of fluorescent lamp disposers for the past 25 years, Dextrite has been upgrading design improvements of its disposers for the safety of employees who are responsible for operating its equipment and also for environmental concern.

DCN FLEP-00076

COMMENTER The Southland Corporation

SUBJECT BAK

COMMENT With more than 14,300 convenience stores worldwide, 7-Eleven is the premier name and largest chain in the convenience retailing industry. Over 5,600 7-Eleven and other convenience stores are operated or franchised in the United States and Canada by The Southland Corporation. IYG Holding Company, a wholly owned subsidiary of Ito-Yokado Co., Ltd., and Seven-Eleven Japan Co., Ltd., has owned a majority interest in Southland since 1991. Seven-Eleven Japan operates approximately 5,600 7-Eleven stores under an area license agreement with Southland. Additionally, about 3,000 7-Eleven stores are operated by area licensees and affiliates of Southland in the U.S., its territories and 18 other countries.

DCN FLEP-00076

COMMENTER The Southland Corporation

SUBJECT BAK

COMMENT If you have any questions about Southland's position concerning the RCRA, please call: 214-828-5581

DCN FLEP-00077

COMMENTER Brown and Caldwell

SUBJECT BAK

COMMENT On behalf of its client (Client) Brown and Caldwell offers the following comments to the EPA's proposed rule-making regarding management of mercury-containing light bulbs.

DCN FLEP-00078

COMMENTER Tennessee Valley Authority

SUBJECT BAK

COMMENT The following are the Tennessee Valley Authority's (TVA) comments on the Environmental Protection Agency's (EPA) proposals for managing lamps containing waste mercury (59 FR 38288, July 27, 1994). We are pleased that EPA is considering regulatory options that will protect human health and the environment while reducing the regulatory burden on generators of waste lamps. TVA is one of the largest generators of electricity in the country. TVA has facilities in seven states with a total of more than 1,100 buildings occupying over 26 million square feet. As such, we generate a substantial quantity of lighting waste from a wide variety of facilities.

DCN FLEP-00079

COMMENTER Voltarc Technologies, Inc.

SUBJECT BAK

COMMENT Voltarc Technologies, Inc. (Voltarc) is responding to the EPA Proposal On Hazardous Waste Management Of Mercury-Containing Lamps. Our company is located in Fairfield, Connecticut and manufactures tanning and specialty lamps that fill a gap in the marketplace left by the large lamp manufacturers. Voltarc employs approximately 420 people; 80 of whom were hired in the past year.

DCN FLEP-00084

COMMENTER Jeff Carmichael

SUBJECT BAK

COMMENT [I am] a private citizen who has worked in the waste management field for the last ten years.

DCN FLEP-00086

COMMENTER Northeast Utilities Service Co.

SUBJECT BAK

COMMENT Northeast Utilities Service Company (NUSCO), on behalf of The Connecticut Light and Power Company, Western Massachusetts Electric Company, Holyoke Water Power Company, North Atlantic Energy Service Corporation, Public Service Company of New Hampshire, Northeast Nuclear Energy Company and Connecticut Yankee Atomic Power Company hereby submits an original and two copies of comments on EPA's proposed lighting waste rule, July 27, 1994.

DCN SCSP-00086

COMMENTER Northeast Utilities

SUBJECT BAK

COMMENT Northeast Utilities Service Company (NUSCO), on behalf of The Connecticut Light and Power Company, Public Service Company of New Hampshire, Western Massachusetts Electric Company, and Holyoke Water Power Company submits one original and two copies of comments on EPA's proposed rule "Hazardous Waste Management System: Modification of the Hazardous Waste Recycling Regulatory Program" 58 FR 8102 (February 11, 1993).

DCN FLEP-00087

COMMENTER NECRRRA

SUBJECT BAK

COMMENT Enclosed please find a resolution adopted by the Northeastern Connecticut Regional Resource Recovery Authority (NECRRRA) at its regular meeting on September 16, 1994 referring to the above indicated USEPA docket number.

DCN FLEP-00087

COMMENTER NECRRRA

SUBJECT BAK

COMMENT NECRRRA is a public body formed by eight Connecticut municipalities under state statutes enabling towns to research and carry out methods for the disposal of municipal solid waste.

Since its inception in 1986, NECRRRA, to achieve its goal of developing an integrated solid waste management plan for its members, has studied recycling, resource recovery, MSW composting, household hazardous waste disposal, and sludge composting. It has implemented a very successful regional recycling program which has exceeded the state goals in the types and amounts of materials recycled and has completed a landfill mining project. Its members have visited MSW composting facilities across the country and waste incinerators in southern New England, and have compared options for MSW disposal through a variety of methods.

DCN FLEP-00087

COMMENTER NECRRRA

SUBJECT BAK

COMMENT WHEREAS, the Northeastern Connecticut Regional Resource Recovery Authority (NECRRRA), on behalf of regional users of energy efficient fluorescent and high intensity discharge lamps containing mercury and its member towns, finds that it is necessary to respond to USEPA proposed rule 59 FR 38288, and

DCN FLEP-00088

COMMENTER S.C. Johnson and Son, Inc.

SUBJECT BAK

COMMENT The North American Division of S. C. Johnson & Son, Incorporated (SC Johnson) is a Wisconsin manufacturer of consumer, commercial and institutional products. SC Johnson has long supported sound and progressive environmental protection measures and has worked in alliance with regulatory agencies to achieve these goals in numerous rulemakings. SC Johnson believes its participation and comments have been valuable contributions to the rulemaking process over the years.

DCN FLEP-00090

COMMENTER The Boeing Company

SUBJECT BAK

COMMENT The Boeing Company appreciates the opportunity to provide comments on the "Mercury-Containing Lamps" proposed rule. Boeing is a major manufacturer of aerospace products, including commercial and military aircraft. While a majority of facilities

are located in the State of Washington, we also have facilities in Kansas, Oregon, Tennessee, Alabama, Pennsylvania, Georgia, California, Texas, Montana, Virginia and Louisiana.

DCN FLEP-00093

COMMENTER Institute of Scrap Recycling Industries,

SUBJECT BAK

COMMENT The Institute of Scrap Recycling Industries, Inc. (ISRI) is pleased to submit the following comments in response to EPA's proposed rule concerning mercury-containing lamps. ISRI represents approximately 1,500 member companies that process, broker, and consume scrap commodities -- including ferrous and nonferrous metals, paper, glass, textiles, rubber, and plastics. ISRI members handle over 100 million tons of recyclables annually. Scrap processors annually recycle approximately 58 million tons of iron and steel; 6.8 million tons of non-ferrous metal; 28 million tons of paper and paperboard; 2 million tons of glass (cullet); and 87,500 tons of plastics. These figures are equivalent to over one-half of the municipal solid waste (MSW) stream and represent materials that were diverted or removed from the solid waste stream for use in making new products. The materials processed by ISRI members are either non-hazardous solid wastes or are exempt from Subtitle C regulation by virtue of the scrap metal exemption [1] [Footnote 1: 40 CFR 261.6(a)(3)(iv)] and are thus unaffected by the proposed rule.

DCN FLEP-00094

COMMENTER City of Springfield Office of Pub. Util.

SUBJECT BAK

COMMENT I am commenting on the above referenced proposed rule for City Water, Light & Power (CWLP) in Springfield, Illinois. CWLP is a publicly-owned utility servicing 63,000 customers in Springfield and surrounding environments.

DCN FLEP-00095

COMMENTER Allegheny Power System

SUBJECT BAK

COMMENT The following comments, in response to EPA's Proposed Rule on the Management of Mercury-Containing Lamps (59 Fed. Reg. 38288 (July 27, 1994)). Docket No. F-94-FLEP-FFFFF, are submitted on behalf of the operating companies which make up what is referred to as the integrated Allegheny Power System (hereinafter "APS"). These three operating companies, Monongahela Power Company, The Potomac Edison Company, and West Penn Power Company service an area of approximately 29,100 square miles, and approximately about 1.4 million customers in parts of West Virginia, Pennsylvania, Maryland, Virginia, and Ohio. APS is interested in this proposed rule because it directly affects the operating companies' participation in, and management of, the Green Lights program and other demand-side management programs offered to customers.

DCN FLEP-00096

COMMENTER Seward Co. Rural Power District

SUBJECT BAK

COMMENT The Seward County Rural Public Power District, Seward, Nebraska is a small electrical rural distribution system serving approximately 2600 services in eastern Nebraska. We have hundreds of mercury-containing security lights throughout our system.

DCN FLEP-00097

COMMENTER Alabama Municipal Electric Authority

SUBJECT BAK

COMMENT Alabama Municipal Electric Authority (AMEA) is a joint action agency and power supplier for 11 municipal electric systems in Alabama. These 11 utilities represent approximately 86,500 meters and a population of about 160,000.

DCN FLEP-00098

COMMENTER Indiana Retail Council, Inc.

SUBJECT BAK

COMMENT On behalf of the members of the Indiana Retail Council, I am

writing to comment on the Environmental Protection Agency proposed rule regarding disposal of fluorescent and high intensity discharge lamps. The IRC is a broad based trade association of drug, grocery and department stores in Indiana.

DCN FLEP-00099

COMMENTER Southwestern Bell Telephone

SUBJECT BAK

COMMENT This is in response to your request for comments that appeared in the July 27, 1994 Federal Register on two alternate approaches for managing mercury-containing lamps (MCLs) such as incandescent, fluorescent, high pressure sodium, mercury vapor and metal halide lamps under the Agency's hazardous waste management rules (HWMRs). Southwestern Bell Telephone Company (SWBT) is a telecommunications company whose primary business is providing local telephone service as described in Standard Industrial Classification (SIC) code 4813, and owns approximately 6,100 facilities that periodically generate spent MCLs for disposal. Because of the small quantities of MCLs that are generated at most locations, SWBT generally falls within the category of a conditionally exempt small quantity generator (CESQG). It is for this reason that the following comment is provided:

DCN FLEP-00100

COMMENTER Arizona Municipal Power Users' Assn.

SUBJECT BAK

COMMENT The Arizona Municipal Power Users' Association ("AMPUA") is an association of consumer owned and operated electrical systems and it consists of cities and towns, rural electric distribution and generation cooperatives, special districts, irrigation and electrical districts, water conservation districts, agricultural improvement districts, Indian water projects and Indian utilities. Collectively the members deliver almost one-half the electricity in Arizona to approximately a million people, most of whom regard themselves as environmentalists. The following are the comments of AMPUA on the U.S. Environmental Protection Agency's proposed rules governing lighting waste. The proposed regulation is found at 59 Federal Register 38288-90, July 27, 1994.

DCN FLEP-00105

COMMENTER Waverly Light and Power

SUBJECT BAK

COMMENT Waverly Light and Power has an aggressive Demand Side Management Program. The program, among other things, encourages customers to install more energy efficient lighting systems. The proposed-Rule 59 Fed Reg. 38288-90: lighting waste would seriously deter all re-lamping, which in our opinion is detrimental to the environment.

DCN FLEP-00106

COMMENTER Town of Wickenburg, AZ

SUBJECT BAK

COMMENT The Town of Wickenburg, Arizona owns and operates its own electric utility, among other municipal utilities, which serves much of its population of approximately 4,800 people. The following are the comments of the Town of Wickenburg on the U.S. Environmental Protection Agency's proposed rules governing lighting waste. The proposed regulation is found at 59 Federal Register 38288-90, July 27, 1994.

DCN FLEP-00108

COMMENTER Union Electric Company

SUBJECT BAK

COMMENT Union Electric Company is pleased to submit comments on EPA's proposed rule on Modification of the Hazardous Waste Program; Mercury-Containing Lamps. Union Electric supplies electric power to over 1,000,000 customers in a two-state area of the Midwest. Union Electric is a member of the Utility Solid Waste Activities Group (USWAG) and is participating in the preparation of USWAG's comments to the Agency.

DCN FLEP-00109

COMMENTER City of Edmond, OK

SUBJECT BAK

COMMENT These are the City of Edmond, Oklahoma's comments on the U.S. Environmental Protection Agency's proposed rules governing lighting waste. The proposed regulation is found at 59 Federal

Register 3288-90, July 27, 1994. Edmond owns, operates and maintains a municipal electric distribution system within the corporate city limits of the City of Edmond, Oklahoma, and provides retail electric service to over 23,000 residential and commercial customers. Being publicly owned, we operate on a not-for-profit basis, with control over policy and service in local public hands.

DCN FLEP-00110

COMMENTS City of Wahoo, NE

SUBJECT BAK

COMMENT The City of Wahoo Utilities is a small Municipally owned electric utility.

DCN FLEP-00113

COMMENTS City of Safford, AZ

SUBJECT BAK

COMMENT The City of Safford is a rural community of approximately 8,000 people. The City consists of an elected Mayor, 6 elected Council members and 150 staff members. The Municipal Utilities of the City provides Natural Gas, Water, Sewer, Electrical Distribution, Trash pick-up, Airport, Fire Department, Cemetery and Golf Course. The following are the comments of The City of Safford on the U.S. Environmental Protection Agency's proposed rules governing lighting waste. The proposed regulation is found at 59 Federal Register 38288-90, July 27, 1994.

DCN SCSP-00114

COMMENTS National Electric Manufacturers Assn.

SUBJECT BAK

COMMENT The National Electrical Manufacturers Association (NEMA) is submitting these comments on the rule proposed by EPA for the Hazardous Waste Management System, and Modification of the Hazardous Waste Recycling Regulatory Program which appeared in the Federal Register on February 11, 1993 (58 FR 8102-8133). These comments are confined to the discussion in the proposal on spent fluorescent lamps. NEMA is the principal national trade association for manufacturers in the electrical industry. NEMA represents over 600 domestic manufacturers of products used in the generation, transmission, distribution and end-use of electrical energy. NEMA members which manufacture fluorescent

lamps comprise over 90% of the industry.

DCN FLEP-00115

COMMENTER American Textile Manufacturers Institute

SUBJECT BAK

COMMENT ATMI is the national trade association for the domestic textile industry. Our member companies operate in more than 30 states and account for approximately 80 percent of all textile fibers consumed by mills in the United States.

DCN FLEP-00117

COMMENTER Dayton Power and Light Company

SUBJECT BAK

COMMENT The Dayton Power and Light Company is an investor-owned utility that provides safe and reliable low-cost electricity to nearly 500,000 customers in West Central Ohio. Additionally, DP&L's demand-side management (DSM) program includes a Lighting Technology Center that assists customers in making efficient lighting choices. (See enclosed information on DP&L's Energy Resource Center.)

DCN FLEP-00119

COMMENTER Nebraska Municipal Power Pool

SUBJECT BAK

COMMENT NMPP Energy is the umbrella trade name we use to describe three separate entities. (NMPP, MEAN, and NPGA) The Nebraska Municipal Power Pool (NMPP) provides more than 131 communities with reliable energy services at the lowest possible costs. These services include load management, demand side management, computer services, mutual aid and distribution services. All services are designed to allow municipalities to help themselves and each other. MEAN, the Municipal Energy Agency of Nebraska, a political subdivision of Nebraska provides wholesale electric service to 57 municipalities in Nebraska, Kansas and Colorado. Nebraska Public Gas Agency (NPGA), a public corporation, provides wholesale natural gas service to 16 communities in the Nebraska, Colorado, Iowa, Kansas, and Wisconsin.

DCN FLEP-00121

COMMENTER Arizona Electric Power Cooperative, Inc.

SUBJECT BAK

COMMENT Arizona Electric Power Cooperative, Inc. (AEPCO) is a Rural Generation and Transmission (G&T) Cooperative with six distribution cooperative members and long-term power contracts with the City of Mesa, Arizona and the Salt River Project. AEPCO supplies power through its distribution cooperatives to residential, commercial, and industrial customers in Arizona, southwestern New Mexico and southern California.

DCN FLEP-00122

COMMENTER American Electric Power Service Corp.

SUBJECT BAK

COMMENT On behalf of American Electric Power Service Corporation Fuel Supply Division and its affiliated companies, Central Ohio Coal Company, Southern Ohio Coal Company, Windsor Coal Company, Conesville Coal Preparation Company, Cook Coal Terminal and Lakin River Transportation (the "Companies"), the following comments are offered for your consideration.

DCN FLEP-00123

COMMENTER W.R. Grace and Company

SUBJECT BAK

COMMENT W.R. Grace & Co. has over 100 manufacturing plants and offices in the continental United States. We are actively engaged in an energy lamp replacement program, in part, spurred on by participation in the "Green Lights" program. These facts prompt our comment on your proposed rule; Hazardous Waste Management System; Modification of the Hazardous Waste Program, Mercury-Containing Lamps 59 FR 38288; July 27, 1994.

DCN FLEP-00124

COMMENTER Commonwealth Edison Company

SUBJECT BAK

COMMENT Commonwealth Edison Company (ComEd) wishes to take this opportunity to provide the United States Environmental Protection Agency with comments on proposed regulations for the management of mercury lamp waste as outlined in 59 Federal Regulation 38288 (July 27, 1994). ComEd is an investor-owned public electric utility serving approximately 3 million, customers in Northern Illinois. Company service territory, which includes the City of Chicago, is approximately 11,000 square miles. ComEd generates electrical power for its customers from sixteen (16) generating stations, and delivers electrical energy

through an extensive transmission and distribution grid system. The Company's customer base includes a significant number of commercial and industrial electric energy users, particularly within the greater Chicago metropolitan region. These customers include high rise office buildings in downtown Chicago, large commercial multi-store retail buildings (e.g. shopping centers), thousands of smaller commercial establishments, a significant number of industrial complexes, and over 400 municipalities with street lighting systems. It is these large commercial/industrial users of ComEd electrical energy that are most interested in relamping programs similar to EPA's Green Lights initiatives.

DCN FLEP-00128

COMMENTER Suburban Lighting, Inc.

SUBJECT BAK

COMMENT Suburban Lighting Inc. provides lighting maintenance services to over 3,000 locations in Minnesota, Wisconsin, Iowa, Illinois, Michigan and North and South Dakota. Founded in 1966 we remove and replace approximately 300,000 lamps annually for our customers.

DCN FLEP-00129

COMMENTER Automated Energy Controls

SUBJECT BAK

COMMENT My company is an electrical contracting company named Automated Energy Controls hereinafter called simply AEC. The majority of work that we do is lighting retrofit. We reduce the energy-consumption of electric used in lighting of buildings. We do about \$150,000 worth of retrofitting per month. We have 15 people in the field doing the work for us. We did 29 jobs last year and replaced approximately 2,000,000 or so lamps. We do work in the entire state of Michigan.

DCN FLEP-00131

COMMENTER Sacramento Municipal Utility District

SUBJECT BAK

COMMENT Sacramento Municipal Utility District (SMUD) would like to thank the United States Environmental Protection Agency (EPA) for the opportunity to provide written comments on EPA's proposed rule governing the management of lighting wastes. The proposed regulations is found at 59 Federal Register 38288-90, July 27, 1994. SMUD, a political subdivision of the State of California,

generates and delivers electric services to business and residential customers in the greater Sacramento area across a service territory of 900 square miles.

DCN SCSP-00131

COMMENTER Monsanto

SUBJECT BAK

COMMENT Monsanto Company operates a number of facilities that generate these types of hazardous wastes. Relief in the management standards associated with the collection and storage of these types of materials could positively impact a number of Monsanto operations. For this reason, we appreciate this opportunity to comment.

DCN FLEP-00132

COMMENTER Trico Electric Cooperative, Inc.

SUBJECT BAK

COMMENT Trico Electric Cooperative, Inc. (Trico) is a non-profit, member-owned electric distribution utility located in Tucson, Arizona. We serve the tri-county areas of Greater Tucson which include Pima, Pinal and Santa Cruz counties and we currently serve approximately 16,500 members.

DCN FLEP-00134

COMMENTER Aetna Life and Casualty Company

SUBJECT BAK

COMMENT Aetna Life and Casualty Company and its subsidiaries ("Aetna") appreciates this opportunity to comment on the U. S. Environmental Protection Agency's ("USEPA") proposed rule concerning mercury-containing lamp management. Since Aetna owns or leases hundreds of facilities throughout the country and further owns or operates numerous commercial buildings which are leased to others, Aetna believes the proposed rule making may impact its operations.

DCN FLEP-00136

COMMENTER Wisconsin Dept. of Natural Resources

SUBJECT BAK

COMMENT Attached to this letter are the Wisconsin Department of Natural Resources' (WDNR) comments on the U.S. Environmental Protection

Agency's proposed rules for the management of waste mercury-containing lamps.

DCN FLEP-00136

COMMENTER Wisconsin Dept. of Natural Resources

SUBJECT BAK

COMMENT We hope that you will find our attached comments, Departmental guidance, and Departmental and USEPA Region V letters on this issue useful. We would be happy to discuss our experience and guidance with USEPA staff as you consider how to proceed with this regulation. If you have any questions, please contact Tim Mulholland of my staff at 608/266-0061. Thank you.

DCN FLEP-00136

COMMENTER Wisconsin Dept. of Natural Resources

SUBJECT BAK

COMMENT The following constitute the comments of the Wisconsin Department of Natural Resources (WDNR) on the U.S. Environmental Protection Agency's proposed rule on the management waste mercury-containing lamps, published in the July 27, 1994 Federal Register (59 FR 38288).

DCN FLEP-00136

COMMENTER Wisconsin Dept. of Natural Resources

SUBJECT BAK

COMMENT On behalf of the Lake Superior Pollution Prevention Implementation Team, I want to thank you for the opportunity to review the draft report titled "Mercury Sources and Regulations - Background Information for the Virtual Elimination Pilot Project". As you know, the Lake Superior Pollution Prevention Team is a group of staff representing all media, from the states of Michigan, Minnesota and Wisconsin, and members from your Office and the Vazer Division at the US Environmental Protection Agency (EPA). The members of this team commend the progress and information that this project has accomplished thus far. We are also encouraged by the creation of an EPA Mercury Task Force which could address, at a national level, many of the issues the Virtual Elimination Pilot Project (VEPP) and our project have

discussed regarding the reduction and elimination of mercury reaching the environment. Members of the Lake Superior Pollution Prevention Implementation Team have read the draft VEPP report and have already provided specific comments. As you are aware, we are using similar information in developing pollution prevention and reduction strategies specifically for the Lake Superior basin. We would like to provide you with some recommendations that have come from our work, in preparation for the upcoming Virtual Elimination meeting in late September. The states surrounding Lake Superior and EPA have considered pollution prevention strategies as part of the Binational Program to Restore and Protect, the Lake Superior basin. These strategies were printed in an October 1993 report titled "Lake Superior Pollution Prevention Strategies." The document contains recommendations for the states and EPA to use in achieving the zero discharge and zero emission goal of the Binational Program. Our group is now working to develop an implementation plan for pollution prevention, in a broad sense, to serve as a "road map" in Lake Superior during the next 5 years. All of the members of the team recognize pollution prevention as an important, if not primary, method for achieving zero discharge. We have discussed and supported some very good pollution prevention opportunities for mercury. However, while embracing the pollution prevention hierarchy, we are cognizant that in certain situations, we must go beyond pollution prevention, and require stronger controls on the releases, emissions or discharges of mercury. Some of the members of the Lake Superior pollution prevention team have served on other mercury task forces and have some insight on pollution control technology and mercury cross-media transfer problems. Some of the recommendations we have developed will require regional or national consideration, development and application in order to see reductions specifically in Lake Superior. It is important that these regional and national issues are acted upon through projects such as the Virtual Elimination Pilot Project.

DCN FLEP-00137

COMMENTS Planned Lighting, Inc.

SUBJECT BAK

COMMENT Planned Lighting Inc. has been in the lighting maintenance business for over 54 years. We currently employ 27 union certified men, in the field and another six people in the

office, in an administrative capacity. With service in Illinois and northern Indiana, I would estimate we handle an excess of 100,000 lamps per year.

DCN FLEP-00137

COMMENTS Planned Lighting, Inc.

SUBJECT BAK

COMMENT Please exercise a leadership role on this issue. We appreciate your time and consideration in this matter.

DCN SCSP-00137

COMMENTS Utility Solid Waste Activities Group

SUBJECT BAK

COMMENT The Utility Solid Waste Activities Group, Edison Electric Institute, American Public Power Association and National Rural Electric Cooperative Association are pleased to submit the enclosed comments in response to EPA's proposed rule on Hazardous Waste Management System; Modification of the Hazardous Waste Recycling Regulatory Program (58 Fed. Reg. 8102 (Feb. 11, 1993)). We are enclosing for filing an original and two copies, and would be glad to provide additional copies on request. We respectfully request that the enclosed additional copy of the comments be date stamped and returned to us with our messenger. The Utility Solid Waste Activities Group, Edison Electric Institute, American Public Power Association and National Rural Electric Cooperative Association appreciate the opportunity to submit these comments. We hope they will be of value to the Agency in its consideration of the proposed special collection system. The following comments in response to "Hazardous Waste Management System; Modification of the Hazardous Waste Recycling Regulatory Program; Proposed Rules 58 Fed. Reg. 8102 (Feb. 11, 1993), Docket No. F-93-SCSP-FFFFF, are submitted on behalf of the Utility Solid Waste Activities Group ("USWAG"), the Edison Electric Institute ("EEI"), the American Public Power Association ("APPA"), and the National Rural Electric Cooperative Association ("KRECA") (collectively referred to as "USWAG"). USWAG is an informal consortium of EEI, APPA, NRECA, and approximately 80 electric utility operating companies. EEI is the principal national association of investor-owned electric power and light companies. APPA is the national association of publicly-owned electric utilities. NRECA is the national

association of rural electric cooperatives. Together, USWAG members represent more than 85 percent of the total electric generating capacity of the United States, and service more than 95 percent of the nation's consumers of electricity.

DCN SCSP-00137

COMMENTER Utility Solid Waste Activities Group

SUBJECT BAK

COMMENT [Footnote 1: USWAG is an informal consortium of the Edison Electric Institute ("EEI"), the American Public Power Association ("APPA"), and the National Rural Electric Cooperative Association ("NRECA"), and approximately 83 electric utility operating companies. EEI is the principal national association of investor-owned electric power and light companies. APPA is the national association of publicly-owned electric utilities. NRECA is the national association of publicly-owned electric utilities. NRECA is the national association of rural electric cooperatives. Together, USWAG members represent more than 85 percent of the total electric generating capacity of the United States, and service more than 95 percent of the nations consumers of electricity.]

DCN FLEP-00138

COMMENTER Indiana Michigan Power Company

SUBJECT BAK

COMMENT I&M greatly appreciates the time extension given by EPA to submit comments with respect to the proposed rulemaking and the opportunity to give comments.

DCN FLEP-00140

COMMENTER Texas Utilities Services, Inc.

SUBJECT BAK

COMMENT Texas Utilities Services, Inc. submits the following comments on behalf of Texas Utilities Electric Company concerning the Proposed Rule, Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps, as published in the Federal Register July 27, 1994, on pages 38288-38304. The principal business of the Texas Utilities

Company System (hereinafter referred to as Texas Utilities) is the generation and distribution of electrical energy in north, central, east, and west Texas to approximately one-third of the population and area of Texas.

DCN FLEP-00141

COMMENTER Dow Chemical Company

SUBJECT BAK

COMMENT Dow submits three copies of these comments to make the following additional points.

DCN FLEP-00141

COMMENTER Dow Chemical Company

SUBJECT BAK

COMMENT Dow is pleased with this attempt to ease the regulatory burden imposed by RCRA in cases, like this, where there is little, if any protection to human health and the environment added from, full RCRA regulation of this waste stream. Please let either of us know if Dow can be of further assistance.

DCN FLEP-00142

COMMENTER The Fertilizer Institute

SUBJECT BAK

COMMENT The Fertilizer Institute (TFI) is pleased to submit these comments on EPA's proposed alternative approaches for regulation of mercury-containing lamps under the Resource Conservation and Recovery Act (RCRA) 59 Fed. Reg. 38,288 (July 27,1994). TFI is a non-profit trade association of the fertilizer industry, whose over 200 member companies manufacture 90 percent of domestically produced fertilizer. Used mercury-containing lamps are generated by a number of TFI members. Accordingly, TFI has a vital interest in the proposed rule.

DCN FLEP-00143

COMMENTER A-TEC Energy Corporation

SUBJECT BAK

COMMENT A-TEC Energy Corp. and A-TEC Recycling, Inc. are Iowa corporations. The principals are Ron Newman and Mike Krueger. Corporate headquarters are located at 1501 Ingersoll Avenue, Suite 201, Des Moines, IA 50309. A-TEC Energy Corp. has provided energy consulting, field and administrative support services for investor-owned gas and electric utilities since 1987. A-TEC Recycling, Inc. provides fluorescent lamp and HID lamp recycling services for business/government facilities in the Midwestern United States. A-TEC Recycling, Inc. was started in 1993 following research conducted on behalf of A-TEC Energy Corp. utility clients. These utility clients were searching for ways to reduce/eliminate potential RCRA and CERCLA liability for themselves and their customers due to lamp disposal following lighting retrofits.

DCN FLEP-00143

COMMENTER A-TEC Energy Corporation

SUBJECT BAK

COMMENT Thank you for taking the time to review this document. If A-TEC Recycling, Inc. may answer questions, please contact me personally.

DCN FLEP-00144

COMMENTER National Rural Electric Cooperative Assn

SUBJECT BAK

COMMENT The National Rural Electric Cooperative Association (NRECA) respectfully submits comments in response to EPA's proposed "Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps" (59 FR. 38288 (July 27, 1994)). NRECA is the national service organization representing approximately 1,000 not-for-profit rural electric systems which provide central station electric power to 25 million people in 2,600 counties in 46 states. NRECA is responding to the above-referenced proposed rulemaking on behalf of its membership.

DCN FLEP-00145

COMMENTER ASTSWMO

SUBJECT BAK

COMMENT The purpose of this letter is to forward the docket comments of the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) to the U.S. Environmental Protection Agency (USEPA) for consideration by the Agency in its proposed rule regarding modification of the hazardous waste program for management of mercury containing lamps, as published in the Federal Register on July 27, 1994 (59 FR 38288). These comments were developed by ASTSWMO's Definition of Waste Task Force (Task Force) , which is comprised of State waste program experts representing cross-program perspectives from several regions of the country. These comments have also been reviewed and endorsed by ASTSWMO's Board of Directors. Individual State waste managers will submit their separate comments which will note any differences of approach and address issues of special significance to that State's-waste program.

DCN FLEP-00146

COMMENTER Sierra Club/North Star Chapter

SUBJECT BAK

COMMENT The purpose of this letter is to forward to the docket comments of the North Star (Minnesota) Chapter of the Sierra Club for consideration by the Agency in its proposed rule regarding modification of the hazardous waste program for the management of mercury containing lamps, as published in the Federal Register on July 27, 1994 t(59 FR 38288). These comments were approved at a meeting of the Executive Committee of the North Star Chapter on November 16, 1994.

DCN SCSP-00146

COMMENTER Advanced Environmental Recycling Corp.

SUBJECT BAK

COMMENT Advanced Environmental Recycling Corporation (AERC) is pleased to submit comments (original and two copies enclosed) on the February 11, 1993 Proposed Rule to 40 CFR Parts 260 et al Modification to a Hazardous Waste Recycling Regulatory Program (Universal Waste). Advanced Environmental Recycling Corporation (AERC) is an environmental service company incorporated in 1990 for the purpose of developing and implementing recycling technologies for hazardous materials. AERC's first two years of

operation-were entirely dedicated to the research and development activities associated with the recycling of mercury, precious metals, laboratory chemicals, paint, and other related materials. During this: research and development process, AERC commenced the development activities for the recycling of fluorescent lamps and other mercury-containing lighting devices. This process concluded with the formation a joint venture agreement with Mercury Technologies Corporation, which established Mercury Technologies International, L.P. AERC is the managing partner of this joint venture, MTI is solely in the business of recycling fluorescent lamps and other lighting devices through patented technology. AERC is a spin-off corporation of Advanced Environmental Technology Corporation (AETC), an environmental service company located throughout the United States, specializing in hazardous waste management for 17 years.

DCN FLEP-00147

COMMENTS Earthwell International Tech., Inc.

SUBJECT BAK

COMMENT Earthwell International Technologies, Inc. is an energy services company incorporated July, 1992 operating in Kentucky, Ohio and Indiana. Earthwell now employs five office/sales personnel and contracts with five electricians to handle the lighting retrofit installations. My partner and I wanted to form an environmentally related business because we both felt very strongly that private citizens and businesses should do whatever they could to reverse the degradation of our environment and to preserve our natural resources. Early in our search we became quite intrigued with EPA's Green Lights program. It was obvious to us that any discussion concerning the environment had to include a discussion about the use of fossil fuel since the combustion of fossil fuel is no doubt the single largest source of pollution. Green Lights represented to us a wonderful way for America to dramatically curb its appetite for fossil fuel and the enormous amount of pollution we create by its use. Using the EPA's estimates for pollutants reduced for each kilowatt not generated, Earthwell calculates that so far we have removed 5,407 tons of [carbon dioxide], 73,708 pounds of [sulfur dioxide], and 38,940 pounds of [nitrous oxides], annually. Each passing week these numbers get bigger as the next job is

completed. As you might guess, we are quite proud of our accomplishments and feel great about sparing the environment from these pollutants. We have read that our nations total energy consumption could be cut by as much as 30% if all businesses would convert to the best available lighting technologies.

DCN FLEP-00148

COMMENTER Total Lighting Maintenance and Electric

SUBJECT BAK

COMMENT AS A WOMAN IS BUSINESS ENTERPRISE I AM PARTICULARLY INTERESTED IN ANY LAMP DISPOSAL RULING. TOTAL LIGHTING MAINT. IS AN ENERGY CONSCIENCE LIGHTING MAINTENANCE COMPANY. WE EMPLOY APPROXIMATELY 14 TECHNICIANS AND THREE OFFICE PERSONNEL. WE HAVE SIX VANS ON THE ROAD EVERY DAY, AND WORK IN FOUR STATES: N.J., EASTERN PA., DELAWARE, AND NORTHERN MARYLAND. WE DO A LOT OF CHAIN STORE WORK. WE HANDLE IN EXCESS OF ONE HUNDRED THOUSAND LAMPS PER YEAR.

DCN FLEP-00149

COMMENTER Weyerhaeuser Company

SUBJECT BAK

COMMENT Weyerhaeuser Company is a large forest products company with many interests in North America, including environmental responsibility. Weyerhaeuser is responding to U. S. EPA proposed rule concerning the regulation of Mercury-Containing Lamps (July 27, 1994, 59 FR 38288). Weyerhaeuser Company operates hundreds of buildings, nearly all contain significant percentage of Fluorescent Lamps, if not completely illuminated by these lamps. Thousands of Weyerhaeuser employees rely on these energy conserving lamps, using nearly every type produced. The proposed rule concerning these lamps brings significant concern to the Weyerhaeuser Company.

DCN FLEP-00150

COMMENTER Anchorage Municipal Light and Power

SUBJECT BAK

COMMENT Anchorage Municipal Light & Power (AML&P) is an electric utility

publicly owned by the Municipality of Anchorage, Alaska. AML&P is proud to have provided affordable and reliable electric service for over 60 years. Currently, AML&P supplies nearly a billion kilowatt hours annually to our 30,000 Anchorage customers. AML&P also serves as a pillar of the Alaska Railbelt Intertie System, which provides power to hundreds of thousands of Alaskans. AML&P has a demonstrated history of showing great care for the environment, as well as its customers. These are Anchorage Municipal Light & Power's comments on the U.S. Environmental Protection Agency's proposed rules governing lighting waste. The proposed regulation is found at 59 Federal Register 38288-90, July 27, 1994. Anchorage Municipal Light & Power (AML&P) is an electric utility publicly owned by the Municipality of Anchorage, Alaska. AML&P is proud to have provided affordable and reliable electric service for over 60 years. Currently, AML&P supplies nearly a billion kilowatt hours annually to our 30,000 Anchorage customers. AML&P also serves as a pillar of the Alaska Railbelt Intertie System, which provides power to hundreds of thousands of Alaskans. AML&P has a demonstrated history of showing great care for the environment, as well as its customers.

DCN SCSP-00150

COMMENTER Browning-Ferris, Inc.

SUBJECT BAK

COMMENT 1.0 INTRODUCTION: Browning-Ferris Industries (BFI) is one of the largest publicly held companies in the United States whose subsidiaries and affiliates collect, transport, treat, process for recycling, and dispose of commercial, residential, municipal and industrial solid waste. A significant portion of Universal Type Hazardous (UTH) waste is currently managed in the Subtitle D regulatory framework. As such, BFI is a major stakeholder in the outcome of the proposed Part 273 rule.

DCN FLEP-00151

COMMENTER Association of American Railroads

SUBJECT BAK

COMMENT The Association of American Railroads- [1] (Footer 1) A trade association whose member railroads operate 75 percent of the line-haul mileage, employ 89 percent of the workers and account

for 91 percent of the freight revenue of all railroads in the United States; and who operate almost all of the nation's inter-city passenger trains.] respectfully submits the following comments on EPA's recently proposed rule concerning mercury-containing lamps. EPA has proposed two alternative approaches for the management of these lamps. Under the first alternative, mercury-containing lamps would receive a conditional exclusion from regulation as hazardous waste. Under the second alternative, mercury-containing lamps would be added to EPA's universal waste management system, which was proposed for batteries and pesticides in February 1993. If added to the universal waste management system, lamps that fail the Toxicity Characteristic would be considered hazardous waste, but would be subject to streamlined hazardous waste management requirements.

DCN FLEP-00153

COMMENTER Vermont Dept. of Environ. Conservation

SUBJECT BAK

COMMENT The Vermont Agency of Natural Resources, Department of Environmental Conservation, Hazardous Materials Management Division (HMMD) is taking this opportunity to submit comments regarding the proposed modifications of the hazardous waste program for mercury-containing lamps as published in the July 27, 1994 Federal Register (59 FR 38288).

DCN SCSP-00153

COMMENTER U.S. West Business Resources, Inc.

SUBJECT BAK

COMMENT The following comments are submitted to EPA on behalf of USWEST Business Resources, Inc. ("USWBRI") in response to the EPA Notice of Proposed Rulemaking on the Hazardous Waste Management System: Modification of the Hazardous Waste Recycling Regulatory Program also known as Universal Waste Streams. USWBRI is the procurement and services subsidiary of USWEST, Inc. USWEST, Inc. Is the parent company of USWEST communications, Inc. Which provides local telecommunications services to customers in 14 western and midwestern states.

DCN FLEP-00154

COMMENTER LighTec, Inc.

SUBJECT BAK

COMMENT In the order of background, LighTec, Inc. is a full service lighting design/build company which specializes in "paid from savings" energy conservation projects. We are based in Merrimack, New Hampshire. Over the past five years, through tough economic times, this company has performed major lighting retrofit projects at more New Hampshire schools than any other firm. We handle over eighty thousand high efficiency lamps per year at project sights throughout New England and New York. Our reputation as experts in the field of lighting is well known throughout the region.

DCN FLEP-00155

COMMENTER Amtech Lighting Services

SUBJECT BAK

COMMENT Amtech Lighting Services is one of the nation's leading providers of lighting and sign management services. We currently operate in 21 cities and employ over 700 people. We currently service over 14,000 clients in the 48 contiguous United States.

DCN FLEP-00156

COMMENTER National Electrical Manufacturers Assn.

SUBJECT BAK

COMMENT 1. INTRODUCTION AND SUMMARY OF NEMA POSITION The National Electrical Manufacturers Association (NEMA) is pleased to offer comments on the Environmental Protection Agency's long-awaited proposal to revise the management standards applicable to spent mercury-containing lamps that fail the Toxicity Characteristic. NEMA is the principal trade association for manufacturers in the electrical industry and NEMA member companies account for over 90 percent of sales volume in the lamp manufacturing industry.

DCN FLEP-00157

COMMENTER American Trucking Association, Inc.

SUBJECT BAK

COMMENT The American Trucking Associations Inc. (ATA), located at 2200 Mill Road, Alexandria, VA. 22314-4677, is a federation with affiliated associations in every state and the District of Columbia. In the aggregate, ATA represents every type and class of motor carrier in the country, both for-hire and private. As the national representative of the trucking industry, ATA is vitally interested in any regulation affecting the operation of

facilities and equipment in the nation's trucking fleet. ATA comments herein to EPA's proposed Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps (59 FR 38288) were prepared by the staff of ATA's Environmental Affairs Department which is responsible for handling the environmental issues dealing with truck equipment, maintenance, operations, and facilities. For many years the Department has developed ATA's major position papers and docket submissions related to environmental and vehicle service matters. Along with the work of the ATA Environmental Affairs Department staff, these comments also reflect guidance and input of ATA's Environmental Advisory Group (EAG) and Technical Advisory Group (TAG). The EAG is composed of corporate environmental managers who are responsible for implementing corporate environmental policies and assuring environmental compliance in fleet facilities and operations. TAG members are motor carrier maintenance, safety and research executives balanced both geographically and by types of fleet, thereby representing a broad range of vehicle users a facility managers who will be impacted by equipment regulations. Considering both it's own expertise and the input from TAG and EAG, the Environmental Affairs Department is well qualified to comment on the Proposal regarding the regarding [end of paragraph].

DCN SCSP-00157

COMMENTS PacifiCorp

SUBJECT BAK

COMMENT PacifiCorp is please to submit an original and two copies of comments in response to EPA's proposed rule tinder the Resource Conservation and Recovery Act (RCRA) for "universal wastes" (58 Federal Register 8102 (February 11, 1993)). INTRODUCTION PacifiCorp is an electric utility company operating in seven western states. PacifiCorp's operations include coal- fired power generating stations in Utah, Washington and Wyoming. PacifiCorp also owns and operates coal mines in Utah, Washington and Wyoming. PacifiCorp currently generates a variety of wastes which are subject to full Subtitle C requirements under the Resource Conservation and Recovery Act (RCRA). PacifiCorp has an interest in this rulemaking because the details and scope of the final rule potentially have major implications for the way in

which PacifiCorp's hazardous waste streams are managed in the future.

DCN FLEP-00158

COMMENTER Osram Sylvania Inc.

SUBJECT BAK

COMMENT OSRAM SYLVANIA is one of the principal manufacturers of electric lamps (light bulbs) in the US, and its parent company, OSRAM, is one of the 3 major producers of lamps worldwide. OSRAM SYLVANIA is a member of the Lamp Section of the National Electrical Manufacturers Association (NEMA) and has been actively involved in, and fully supports, the NEMA response to this docket in favor of a conditional exclusion with best management practices.

DCN FLEP-00159

COMMENTER Motorola, Inc.

SUBJECT BAK

COMMENT The purpose of this letter is to provide comments from Motorola, Inc. ("Motorola") on the U.S. Environmental Protection Agency's ("EPA") proposed revisions to its hazardous waste rules set forth in the July 27, 1994 Federal Register, 59 Fed. Reg. 38288. Motorola is one of the world's leading providers of semiconductors, wireless communications, and advanced electronic systems of semiconductors, wireless communications, and advanced electronic systems and services. Motorola currently employs 127,000 people worldwide and operates 34 manufacturing sites in the United States and its territories. In addition to these manufacturing facilities, Motorola occupies and maintains hundreds of offices, service shops, design facilities and warehouses which would benefit from the alternatives set forth in the EPA's proposed rule.

DCN FLEP-00160

COMMENTER Central and South West Services, Inc.

SUBJECT BAK

COMMENT The following comments are submitted by Central and South West Services, Inc. (CSW) in response to EPA's Hazardous Waste Management System; Modification of the Hazardous Waste

Management Program; Mercury-Containing Lamps, Proposed Rule (59 Fed. Reg. 38288, July 27, 1994), Docket No. F-94-FLEP-FFFFF. Central and South West Corporation is a public utility holding company that owns all of the common stock of four electric operating subsidiaries: Central Power and Light Company, Public Service Company of Oklahoma, Southwestern Electric Power Company, and West Texas Utilities Company. These companies provide electric service to more than four million people in a widely diversified area covering 152,000 square miles. This area is the second largest served by any electric utility system in the United States. CSW and its customers are actively engaged in exploring options for achieving demand side management objectives (i.e., producing and using power more efficiently), including, among other things, participating in energy efficient relamping programs. One of the key issues confronting CSW with regard to whether b) participate in re-lamping programs are the regulatory complications associated with the management of lamps removed from service during re-lamping activities. Instrumental in this determination is assessing the full costs of regulatory compliance for spent lamps and determining whether these costs and associated operating obligations outweigh the perceived economic and operational benefits of energy-efficient relamping.

DCN FLEP-00161

COMMENTER American Forest and Paper Association

SUBJECT BAK

COMMENT The American Forest and Paper Association ("AF&PA") submits the following comments on the U.S. Environmental Protection Agency's ("EPA's") proposed waste management rules covering spent mercury-containing lamps ("spent lamps"). AF&PA's membership includes over 500 companies and related trade associations (with members totaling in the thousands) that produce a large percentage of the nation's pulp, paperboard and solid wood products. AF&PA members own and operate manufacturing and storage facilities that use mercury-containing fluorescent lamps in their routine operations. Members' facilities vary greatly in size and configuration, ranging from small outdoor lumber mills to large integrated paper mills with huge areas of enclosed, artificially lighted work space.

DCN FLEP-00164

COMMENTER E.I. Du Pont De Nemours and Co., Inc.

SUBJECT BAK

COMMENT Enclosed for filing in the RCRA Docket are an original and two copies of E.I. du Pont de Nemours and Company, Inc. (DuPont) comments on the EPA's July 27, 1994 [59 Federal Register 38288] proposed rule regarding two alternative approaches being considered for the management of mercury-containing lamps. DuPont has over fifty (50) manufacturing and office facilities located across twenty 20 states and territories, including major subsidiaries such as Conoco, Inc., that use mercury-containing lamps extensively as a result of active participation in the EPA's Green Lights Program. Hence, any modification to the existing hazardous waste management requirements for mercury-containing lamps would have a profound impact on our operations.

DCN FLEP-00165

COMMENTER Ohio Chamber of Commerce

SUBJECT BAK

COMMENT The Ohio Chamber of Commerce is a broad-based association of approximately 4,000 businesses from across the state. We also represent the Ohio Small Business Council and over 350 local area chambers of commerce. Most members of the Ohio Chamber are either involved in the production or use of fluorescent lamps and will be impacted by the propose rule EPA published on July 27, 1994.

DCN FLEP-00166

COMMENTER American Electric Power Service Corp.

SUBJECT BAK

COMMENT American Electric Power (AEP) (Footnote 1 - AEP is one of the largest investor-owned public utility holding companies in the U.S., consisting of seven electric utility operating companies serving 7 million people in seven East-Central States. The AEP operating companies include: Appalachian Power Company, Columbus Southern Power Company, Indiana Michigan Power Company, Kentucky Power Company, Kingsport Power Company, Ohio Power Company, and Wheeling Power Company) is pleased to respond to U.S. EPA's

request for comments on the recently proposed Mercury-containing Lamp rules (see 59 FR. July 27, 1994, p. 38288 - 30304).

Enclosed are detailed comments on several of the major aspects of the proposed rulemaking. In summary:

DCN SCSP-00166

COMMENTS Hennepin Cty. Dept. of Environ. Mgmt.

SUBJECT BAK

COMMENT Hennepin County has been developing and operating collection programs for special wastes for the last four years. Many of these programs are hampered by existing state and federal hazardous waste rules. The special waste rules proposed by EPA would greatly facilitate our efforts to keep these wastes out of the municipal solid waste stream. Hennepin County Department of Environmental Management Comments on: Docket Number F-93-SCSP-FFFFF Hazardous Waste Management System: Modification of the Hazardous Waste Recycling Regulatory Program Federal Register February 11, 1993 (58 FR 8102). Background Hennepin County has just over one million residents and covers an area of approximately 610 square miles. Since the early 1970's the County has had programs for solid and hazardous waste. Hennepin County is mandated in state statutes (Minnesota Statutes 473.811) to adopt an ordinance that encompasses the state hazardous waste rules. Since 1979 Hennepin County has administrated and enforced the state hazardous waste regulations. Since 1984 Minnesota has had EPA authorization and so in effect the County administrates a full RCRA program. The County's hazardous waste program consists of four main components: licensing, inspections, enforcement, and training. The County licenses approximately 3500 companies each year including 105 large quantity generators (LQG), 1600 small quantity generators (SQG), and 1800 very small quantity generators (VSQG). In addition the County monitors an additional 2,000 VSQGs. Each year the County conducts approximately 1600 to 2100 inspections and charges 60 to 90 criminal cases for hazardous waste violations. The County conducts a day long training session each month. Between 300 to 500 generators attend the training sessions each year. Hennepin County has had household hazardous waste collections since 1986. To date almost 70,000 people have participated in either event collections or brought waste into a permanent drop off site. The County's one permanent site is handling over 12,000 participants a year.

Another permanent site will open in the County this year and another two sites are planned in the near future. Minnesota Statutes 473.803 prohibits the County from landfilling any unprocessed solid waste. Three waste-to-energy facilities process all of the County's waste. One facility is a County-sponsored 1000 ton per day mass burn facility. Another 800 tons of waste per day is processed by a 1500 ton per day multi-county refuse derived fuel facility in an adjoining county. A 400 ton per day RDF facility has been constructed by a private firm and has been operating since 1987.

DCN FLEP-00167

COMMENTS Florida Power and Light Company

SUBJECT BAK

COMMENT Florida Power and Light Company is one of the largest investor owned utilities in the country and serves a population of 6.3 million in a service area of 35 counties in Florida. With thirteen large power plant properties, several large office complexes, several large service center complexes and many smaller service facilities throughout the state of Florida, the company is well aware of the challenges of properly managing lighting waste from its own facilities. In addition, FPL participates to a large degree in Demand-Side Management Programs where the company rebates portions of the capital investment of commercial and industrial customers that are willing to relamp with more efficient lighting systems.

DCN FLEP-00168

COMMENTS Merck and Company, Inc.

SUBJECT BAK

COMMENT Merck & Co., Inc. is a major manufacturer of human and animal healthcare products and specialty chemicals. As such, we own and operate manufacturing facilities, research laboratories, and stand-alone office support facilities. All of these facilities generate mercury-containing lamps, primarily in the form of fluorescent tubes. Therefore, we are taking the opportunity to comment on EPA's proposed rule on the "Modification of the Hazardous Waste Program; Mercury-Containing Lamps" [59 Fed. Reg. 38288, July 27, 1994].

DCN FLEP-00169

COMMENTER Advanced Environmental Recycling Corp.

SUBJECT BAK

COMMENT Advanced Environmental Recycling Corporation (AERC) is an environmental service company incorporated in 1990 for the purpose of developing and implementing recycling technologies for hazardous materials. AERC's first two years of operation were entirely dedicated to the research and development activities associated with the recycling of mercury, precious metals, laboratory chemicals, paint, and other related materials. During this research and development process, AERC commenced the development activities for the recycling of fluorescent lamps and other mercury-containing lighting devices. This process concluded with the formation a joint venture agreement with Mercury Technologies Corporation, which established Mercury Technologies International, L.P. (MTI). AERC is the managing partner of this joint venture. MTI is solely in the business of recycling fluorescent lamps and other lighting devices through patented technology.

DCN FLEP-00169

COMMENTER Advanced Environmental Recycling Corp.

SUBJECT BAK

COMMENT If you have any further questions or comments, please do not hesitate to contact me at (201) 691-7300.

DCN FLEP-00170

COMMENTER National Assn. of Energy Services Comp.

SUBJECT BAK

COMMENT NAESCO is a non-profit association that represents the U.S. energy service industry. In the area of energy efficiency, NAESCO member companies provide long-term DSM services to end users. As an Association concerned with energy conservation, NAESCO is similarly concerned with the sound environmental management of any waste product generated by our industry. Therefore, NAESCO would like to express its appreciation to the EPA for its effort in developing the proposed rule, which

reflects a desire to address the competing concerns raised by the management of spent mercury-containing lamps.

DCN FLEP-00170

COMMENTER National Assn. of Energy Services Comp.

SUBJECT BAK

COMMENT The National Association of Energy Service Companies (NAESCO) appreciates the opportunity to comment on the EPA proposed hazardous waste management rule for the disposal of spent fluorescent lamps. NAESCO is a non-profit association that represents the U.S. energy service industry. NAESCO's members are involved in all aspect of that industry, including the development, construction, as well as the ownership, financing and management of energy efficiency, demand side management (DSM) and small alternative energy projects. Our members consist of energy service companies (ESCOs) and related trade ally groups such as utilities, energy efficiency equipment suppliers, distributors and manufacturers, including lamp manufacturers. In addition, our membership includes waste recycling companies. In the area of energy efficiency, NAESCO member companies provide long-term DSM services to end users either independently or under contracts with utilities to deliver "negawatts," or saved units of energy measured and maintained over a long period of time. The majority of these projects are large commercial or public-sector (e.g., hospitals, school districts, public office buildings) buildings.

DCN FLEP-00171

COMMENTER Monsanto Company

SUBJECT BAK

COMMENT Monsanto Company operates a number of facilities that are large quantity generating sites and which generate mercury-containing lamps which are the subject of this proposal. We are also participants in the EPA's Green Lights Program, a program which has been negatively impacted by the present regulatory requirements which force costly management of lamps which are removed as a part of an efficiency-directed relamping effort. For these reasons, we appreciate the opportunity to comment on this rulemaking.

DCN FLEP-00172

COMMENTER Natural Gas Pipeline Company of America

SUBJECT BAK

COMMENT Natural Gas Pipeline Company of America (Natural) appreciates the opportunity to comment on the referenced proposed regulations. Natural is an interstate pipeline company which operates 13,000 miles of pipeline linking key Gulf 'Coast and Southwest gas producing areas with major Midwest markets.

DCN SCSP-00172

COMMENTER Advanced Environmental Technology Corp.

SUBJECT BAK

COMMENT Advanced Environmental Technology Corporation (AETC) would like to take this opportunity to comment on the proposed rule titled: "Hazardous Waste Management System; Modification of the Hazardous, Waste Recycling Regulatory Program". AETC is an environmental service company with offices located throughout the United States. AETC specializes in the packaging, handling, transportation and scheduling for disposal of all hazardous wastes regulated by the USEPA as well as state environmental agencies AETC operates three fully permitted commercial hazardous waste storage, and transfer facilities in Flanders, NJ; Creedmoor, NC; and Richmond, CA. Our customers range In size from Fortune 500 companies to homeowners. AETC specializes in the handling of containerized hazardous waste (less than 110 gallons in size), which includes the packaging and handling of laboratory chemicals (lab packs). In addition to AETC's industrial-services, AETC provides household hazardous waste collection. Clients for these operations range from large municipalities to individual corporations providing household hazardous waste collection for their employees.

DCN FLEP-00173

COMMENTER Advanced Environmental Technology Corp.

SUBJECT BAK

COMMENT AETC is an environmental service company with offices located throughout the United States. AETC specializes in the packaging, handling, transportation, and scheduling for disposal of all hazardous wastes regulated by the USEPA as well as state environmental agencies. AETC operates four fully permitted commercial hazardous waste storage and transfer facilities in

Flanders, New Jersey; Creedmoor, North Carolina; Richmond, California; and Chicago, Illinois. Our customers range in size from Fortune 500 companies to homeowners. AETC specializes in the handling of containerized hazardous waste (less than 110 gallons in size), which includes the packaging and handling of laboratory chemicals (lab packs). In addition to AETC's industrial services, AETC provides household hazardous waste collection. Clients for these operations range from large municipalities to individual corporations providing household hazardous waste collection for their employees.

DCN FLEP-00174

COMMENTS Illuminating Engineering Soc. of N. Am.

SUBJECT BAK

COMMENT Background on IESNA The Illuminating Engineering Society of North America (IESNA) is a technical society, founded in 1906, with a membership of 9,000 individual members, and 580 sustaining members, organized into 12 regions and 110 sections throughout the US, Canada and Mexico. Its purpose is to establish scientific lighting recommendations and to disseminate this information. It is a recognized authority on lighting in the Americas and a leader among the world's technical lighting societies. Through its committee structure the IESNA sets consensus standards and develops recommended practices which affect the public and lighting professionals alike. Many of the recommendations (and the educational programs associated with them) are devoted to the appropriate and efficient use of various light sources, which can reduce both the number of lamps discarded and any waste associated with them.

DCN FLEP- 00175

COMMENTS AT&T

SUBJECT BAK

COMMENT AT&T is the largest supplier of long distance telecommunications services in the United States with a network allowing business and residence customers to communicate voice and data reliably at anytime, anywhere. AT&T employs over 300,000 people, has a presence felt in all 50 states, and generates mercury-containing fluorescent lamps in almost all locations. AT&T appreciates the

opportunity to comment on the subject Proposal.

DCN SCSP-00175

COMMENTER Hazardous Waste Treatment Council

SUBJECT BAK

COMMENT BACKGROUND ON THE TREATMENT COUNCIL

The HWTC is the nation's largest association of commercial firms engaged in high-technology treatment, reclamation, and destruction of hazardous wastes, remedial response at uncontrolled waste sites, and development and marketing of waste treatment equipment. The Treatment Councils member companies share a commitment to the use of advanced technologies for the treatment of hazardous wastes and to the restricted use of land disposal. The purpose of the HWTC is to promote the protection of human health and the environment through the adoption of environmentally sound procedures and methods of treating, reclaiming or destroying hazardous wastes and through the proper management of the residues of those treatment, reclamation and destruction processes. The Council has filed with EPA numerous rulemaking comments, technical studies and data compilations on a wide variety of issues concerning hazardous waste management. The Council has a vital stake in federal, state and local regulations governing the treatment, reclamation, storage, and disposal of hazardous wastes.

DCN FLEP-00176

COMMENTER Coalition of Lamp Recyclers

SUBJECT BAK

COMMENT The coalition of Lamp Recyclers appreciates the opportunity to comment on the proposed rule "Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps, Federal Register July 27, 1994 (59 FR 38288). The Coalition of Lamp Recyclers consists of the following major lamp recyclers: Advanced Environmental Recycling Corporation/MTI; Dynex Industries; Global Recycling Technologies; Lighting Resources, Inc.; MRT System AB; Mercury Recovery Services; Mercury Refining Company, Inc.; Mercury Technologies of Minnesota, Inc.; Recyclights; and USA Lights. This Coalition was formed for the purpose of responding to the proposed rule on mercury-containing lamps and to promote proper recycling and

management of mercury-containing lamps.

DCN FLEP-00177

COMMENTER Philips Lighting Company

SUBJECT BAK

COMMENT Philips lighting Company is pleased to have the opportunity to comment on the Environmental Protection Agency's proposal to revise the management standards for spent mercury containing lamps that fail the Toxicity Characteristic. Philips Lighting, a NEMA member company, fully supports the position developed by National Electrical Manufacturers Association, which is comprised of major United States lighting industry manufacturers.

DCN FLEP-00178

COMMENTER General Electric Company

SUBJECT BAK

COMMENT GE has been a world leader in the lighting industry for over 100 years and currently manufactures approximately 20,000 different lamp products for consumer, commercial and industrial markets worldwide. Based on this experience, GE strongly believes that the management of mercury containing lamps as non-hazardous waste in properly licensed landfills or by qualified recyclers is the best way to protect the environment while at the same time encouraging energy saving choices in the market place.

DCN FLEP-00178

COMMENTER General Electric Company

SUBJECT BAK

COMMENT GE is one of The largest and most diversified companies in the world. With sales approaching \$60 billion, GE operates 12 strategic businesses and employs over 222,000 people, 163,000 of them in the United States. One of GE's most important and oldest businesses is GE Lighting. GE Lighting manufactures approximately 20,000 different lamp products for consumer, commercial, and industrial markets worldwide. Product families include incandescent, fluorescent, high intensity discharge, photo, automotive, holiday, and miniature lighting. GE Lighting is headquartered at Nela Park in Cleveland, Ohio.

The headquarters serves as the administrative and research center for GE Lighting and is also the site of the internationally recognized Lighting Institute, a world-class educational facility for lighting professionals.

DCN FLEP-00179

COMMENTER Environmental Defense Fund

SUBJECT BAK

COMMENT The Environmental Defense Fund (EDF) and National Wildlife Federation (NWF) submit the following comments on EPA docket number F-94-FLEP-FFFFF, a proposed modification of the Agency's hazardous waste management program for mercury-containing lamps (59 Fed. Reg. 38283-38304, July 27, 1994). EDF is a non-profit environmental research, education, and advocacy organization with over 250,000 members nationwide, which has been active in development and implementation of Resource Conservation and Recovery Act (RCRA) legislation and regulations since the law's inception. EDF members live, work, and recreate in areas in which exposure to toxic substances from transport, recycling, or disposal of spent mercury-containing lamps may occur. NWF is the nation's largest not-for-profit, environmental education and advocacy organization with over 4 million members and supporters.

DCN FLEP-00180

COMMENTER Food Marketing Institute

SUBJECT BAK

COMMENT The Food Marketing Institute is a nonprofit association conducting programs in research, education, industry relations and public affairs on behalf of its 1,500 members including their subsidiaries - food retailers and wholesalers and their customers in the United States and around the world. FMI's domestic member companies operate approximately 21,000 retail food stores with a combined annual sales volume of \$220 billion - more than half of all grocery store sales in the United States. FMI's retail membership is composed of large multi-store chains, small regional firms and independent supermarkets. Its international membership includes 200 members from 60 countries.

DCN FLEP-00181

COMMENTER Exxon Chemical Americas

SUBJECT BAK

COMMENT Exxon Chemical Americas (ECA) appreciates the opportunity to submit comments on the proposed EPA rule referenced above. ECA, an affiliate of Exxon Corporation, is a major petrochemical producer with extensive manufacturing facilities in the U.S.

DCN FLEP-00182

COMMENTER Eastman Kodak Company

SUBJECT BAK

COMMENT Eastman Kodak Company is the primary U.S. manufacturer of photographic films, papers, chemicals and other imaging products. Kodak operates a wide variety of manufacturing, distribution and sales facilities nationwide, most of which are lighted with mercury-containing lamps which ultimately become solid or hazardous waste. In some of our office or warehouse facilities, fluorescent tubes represent a significant fraction of the hazardous waste generated. Kodak also has a significant interest in the development of hazardous waste identification criteria based on sound scientific principles and good public policy. Therefore, we are pleased to provide the attached comments on the Agency's proposal regarding the Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps (59 FR 38288, July 27, 1994).

DCN FLEP-00183

COMMENTER Chemical Manufacturers Association

SUBJECT BAK

COMMENT The Chemical Manufacturers Association (CMA) is pleased to submit the following comments on the Environmental Protection Agency's (EPA's) proposed rule concerning "Modification of the Hazardous Waste Program; Mercury-Containing Lamps," 59 Fed. Reg. 38288 (July 27, 1994). CMA is a nonprofit trade association whose member companies represent more than 90 percent of the productive capacity for basic industrial chemicals in the United States. CMA members use mercury-containing lamps extensively in their industrial facilities and office buildings in some cases

as active participants in EPA's Green Lights Program, and therefore would be greatly affected by any modifications to the existing requirements for these lamps. Moreover, CMA members generate hazardous and non-hazardous wastes and are affected by EPA's waste identification policies, such as conditional exclusions and contingent management.

DCN FLEP-00184

COMMENTER Assn. of International Auto Manuf., Inc.

SUBJECT BAK

COMMENT AIAM represents subsidiaries of international automobile companies doing business in the United States. Member companies distribute passenger cars, multipurpose passenger vehicles, and light duty trucks in the U.S. Nearly half of these vehicles are manufactured in new American plants established by AIAM companies in the last decade. In the past ten years, AIAM members have invested \$10 billion in new plants and equipment in the United States. International automakers support more than 500,000 American jobs in manufacturing, supplier industries, ports, distribution centers, headquarters, R&D centers, and automobile dealerships. Production by our member companies in the United States has virtually doubled in the last five years.

DCN FLEP-00185

COMMENTER British Things, Inc.

SUBJECT BAK

COMMENT 1. INTRODUCTION British Things, Inc. (BTI) is pleased to have this opportunity to submit comments on EPA's proposed rule regarding mercury containing lamps. As the sole licensee of innovative British technology that we are about to introduce into the U.S.--technology that provides a safe and economically sensible method of managing lighting waste--British Things, Inc. has a keen interest in EPA's rulemaking. We are pleased that EPA is addressing the unique issues associated with managing lamp wastes and we hope our comments assist in the rulemaking process.

DCN FLEP-00186

COMMENTER Building Owners or Managers Assn. Int.

SUBJECT BAK

COMMENT BOMA International is the oldest and largest trade association representing the office building industry. The 15,000 building owners and managers that BOMA represents nationwide share some grave concerns on the present RCRA regulations for disposal of spent mercury- containing lamps and commend the EPA for addressing this issue.

DCN FLEP-00186

COMMENTER Building Owners or Managers Assn. Int.

SUBJECT BAK

COMMENT Please do not hesitate to contact me at (202) 408-2684 if you have any questions regarding our comments, or if there is any additional information that BOMA may provide as EPA proceeds towards a final rule.

DCN FLEP-00186

COMMENTER Building Owners or Managers Assn. Int.

SUBJECT BAK

COMMENT The Building Owners and Managers Association (BOMA) International appreciates this opportunity to comment on the Environmental Protection Agency's proposed rule on modification of the hazardous waste program (Docket F-94-FLEP-FFFFF). Founded in 1907, BOMA International is the oldest and largest trade association representing the office building industry. BOMA's 15,000 members collectively own or manage over 6 billion square feet of commercial properties and facilities in North America. The membership -- composed of building owners, managers, developers, leasing professionals, facility managers, asset managers and the providers of goods and services -- represents all facets of the commercial real estate industry.

DCN SCSP-00186

COMMENTER Nine West Technologies, Inc.

SUBJECT BAK

COMMENT Nine West Technologies, Inc. (NWT) has been formed to develop and utilize new methods for preventing disposal of fluorescent lamps in landfills while also reclaiming materials from these lamps. NWT's principals have extensive experience in the lighting products industry. Several of us have for years participated in the development of techniques and manufacturing methods at the former Westinghouse Electric Corporation Lamp Division and at other manufacturers in the US.

DCN FLEP-00187

COMMENTER PacifiCorp

SUBJECT BAK

COMMENT PACIFICORP'S INTEREST IN THE PROPOSAL PacifiCorp is an electric utility company operating in seven western states. PacifiCorp's operations include coal-fired power generating stations in Utah, Washington and Wyoming. PacifiCorp also owns and operates coal mines in Utah, Washington and Wyoming. PacifiCorp currently generates a variety of wastes, including spent, mercury-containing lamps, which are subject to full Subtitle C requirements under the Resource Conservation and Recovery Act (RCRA). PacifiCorp has an interest in this rulemaking because the details and scope of the final rule potentially have major implications for the way PacifiCorp's mercury-containing lamps are regulated in the future. This in turn will affect PacifiCorp's ability to implement its commitment to energy-efficient relamping programs.

DCN FLEP-00189

COMMENTER National Aeronautics and Space Admin.

SUBJECT BAK

COMMENT Enclosed is one original and two duplicate copies of the comments of the Kennedy Space Center (KSC) concerning the subject "Mercury-Containing Lamp" rule. Please address any questions on this matter to: NASA Environmental Management Office Attn: Mr. Carl R. Eastman Mail Code: DE-EMO Kennedy Space Center, FL 32899 Telephone Number: (407) 8674W9

DCN FLEP-00190

COMMENTER Browning-Ferris Industries

SUBJECT BAK

COMMENT Enclosed is an original and two copies of Browning-Ferris Industries comments on the proposed mercury lamp rule (59 FR 38288). Should there be any questions regarding BFI's comments I can be reached at the address, phone and facsimile numbers printed on the letterhead of this letter.

DCN FLEP-00190

COMMENTER Browning-Ferris Industries

SUBJECT BAK

COMMENT 1.0 Introduction: Browning-Ferris Industries (BFI) is one of the largest publicly held companies in the United States whose subsidiaries and affiliates collect transport, treat, process for recycling, and dispose of commercial, medical, residential, municipal and industrial solid waste. Because of the ubiquitous nature mercury containing lamps in the solid waste stream, any changes to the current regulations applicable to lamps, will have a substantial impact in the day-to-day management of discarded mercury lamps. Thus BFI, as a major provider of solid waste services, is a significant stakeholder in the outcome of the proposed rule.

DCN FLEP-00191

COMMENTER Utility Solid Waste Activities Group

SUBJECT BAK

COMMENT The Utility Solid Waste Activities Group, Edison Electric Institute, American Public Power Association and National Rural Electric Cooperative Association are pleased to submit the enclosed comments on EPA's proposed rule for Modification of the Hazardous Waste Program; Mercury-Containing Lamps (59 Fed. Reg. 38288 (July 27, 1994) We are enclosing for filing an original and two copies, and would be glad to provide additional copies on request. We respectfully request that the enclosed additional copy of the comments be date stamped and returned to our messenger The following comments in response to EPA's Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps; Proposed Rule (the

"Proposal") (59 Fed. Reg. 38288, July 27, 1994), Docket No. F-94- FLEP-FFFFF, are submitted on behalf of the Utility Solid Waste Activities Group ("USWAG"), the Edison Electric Institute ("EEI"), the American Public Power Association ("APPA") and the National Rural Electric Cooperative Association ("NRECA") (collectively referred to as "USWAG"). USWAG is an informal consortium of EEI, APPA, NRECA and approximately 80 electric utility operating companies. EEI is the principal national association of investor- owned electric power and light companies. APPA, is the national association of publicly owned electric utilities. NRECA is the national association of rural electric cooperatives. Together, USWAG members represent more than 85 percent of the total electric generating capacity of the United States, and service more than 95 percent of the nation's consumers of electricity.

DCN FLEP-00191

COMMENTER Utility Solid Waste Activities Group

SUBJECT BAK

COMMENT CONCLUSION USWAG appreciates the opportunity to comment on this important rulemaking initiative. We look forward to the prompt promulgation of a final rule that establishes a reasonable program under the RCRA system for the management of mercury-containing lamps.

DCN FLEP-00192

COMMENTER Certified Maintenance Services, Inc.

SUBJECT BAK

COMMENT Certified Maintenance Services, Inc. is a corporation that was founded in 1991 by myself, Mark Manfredi with three (3) vans and one (1) ladder truck. We are a full service lighting company, we do interior lighting service as well as sign repairs and Stations. We have grown from 6 employees to 30 employees and 22 vans and trucks. We use an average of 18,000 lamps per year, and service 2,500 facilities in all 50 states.

DCN FLEP-00193

COMMENTER Sunset Lighting Services

SUBJECT BAK

COMMENT Sunset Lighting Services is a nationwide electrical, Sign and maintenance company. We have (21) employees and do approximately \$550,000 lamp volume.

DCN FLEP-00194

COMMENTER Virginia Retail Merchants Association

SUBJECT BAK

COMMENT The Virginia Retail Merchants Association represents an industry with over 28,000 store fronts across the Commonwealth of Virginia. Statewide, the retail industry employs 1 in 5 Virginians. Any regulation having a financial effect on our members creates a dramatic impact on the Virginia economy and the overall quality of life in Virginia.

DCN FLEP-00196

COMMENTER American Lighting Association

SUBJECT BAK

COMMENT The American Lighting Association (ALA) is a non-profit organization with Headquarters in Dallas, Texas that has served the lighting industry in North America for over 50 years. ALA consist of three major divisions - manufacturers, showroom and manufacturer representatives. Membership is by company and total membership is over 900 with 10% in manufacturing, 60% in showrooms, and 30% in representatives. ALA is particularly qualified to comment on the important question of waste disposal because of the broad membership coverage in the marketplace.

DCN FLEP-00199

COMMENTER National Association of Electric Dist.

SUBJECT BAK

COMMENT The National Association of Electrical Distributors is a national trade association with 741 member companies representing over 4,000 business locations in all 50 states. Our members sell electrical products wholesale, including lamps and lighting, and therefore would be seriously affected by any rules and regulations regarding lamp disposal.

DCN FLEP-00200

COMMENTER Duquesne Light Company

SUBJECT BAK

COMMENT I am pleased to submit the following comments in behalf of Duquesne Light Company (DLCo.) on this important rulemaking. Duquesne Light is the principal electrical power generator and provider in the Pittsburgh area. DLCO serves approximately 565,000 customers in Allegheny and Beaver Counties in Western Pennsylvania. As such, we are a major generator of spent mercury containing lamps and are involved in evaluating options for achieving demand side management objectives.

DCN FLEP-00201

COMMENTER WMX Technologies, Inc.

SUBJECT BAK

COMMENT WMX technologies, Inc. and its subsidiaries (collectively WMX) are pleased to submit these comments on the Agency's proposed rule: Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps (40 CFR 260, 261, 273). WMX based in Oak Brook, Illinois, is the leading global environmental services company providing comprehensive solid and hazardous waste services, energy recovery, environmental technologies and engineering resources through subsidiaries and affiliates throughout the United States, Canada and 20 countries overseas. Waste Management Inc, WMX's North America subsidiary, operates 133 solid waste landfills in North America. Its Recycle America and Recycle Canada programs provide curbside recycling for 5.8 million homes through more than 760 contracts. Thirty-five landfill gas recovery and gas-to-electric systems produced 648 million kilowatt-hours of electricity in 1993. Other services include waste minimization services, medical waste services, and portable sanitation services.

DCN FLEP-00202

COMMENTER Union Camp Corporation

SUBJECT BAK

COMMENT Union Camp Corporation (UCC) is a forest-products based company with facilities located across the country. Among these

facilities are pulp and paper manufacturing mills, chemical plants, lumber and plywood mills, flexible packaging and fiber container manufacturing plants. All of UCC's facilities will be affected by the proposed mercury containing lamp proposal; therefore following comments are being submitted to reflect our concerns.

DCN FLEP-00203

COMMENTER American Gas Association

SUBJECT BAK

COMMENT The American Gas Association (A.G.A.) is a national trade association comprising approximately 275 natural gas distribution and transmission companies throughout the United States, Canada and Mexico. These firms deliver gas energy from the wellhead and various unconventional sources to the burner tip, serving over 56 million customers. Collectively, 90 percent of the natural gas consumers in this country are served by A.G.A. members. Many of our members handle mercury containing lamps at various types of facilities. In addition, many of our members are active participants in EPA's Green Lights program. Therefore, we have an interest in this rulemaking. 59 Fed. Reg. 33288 (July 27, 1994).

DCN FLEP-00204

COMMENTER American Lamp Recycling, Ltd.

SUBJECT BAK

COMMENT American Lamp Recycling, Ltd. (ALR) is a RCRA exempt recycler of mercury-containing lamps including all types of tubular fluorescent, UV generating, and high intensity discharge (HID) lamps. The ALR recycling process is exempt from RCRA because no storage of the lamps is required prior to recycling. The elimination of the need for prior storage of lamps before recycling is due to the recycling capacity of the equipment utilized. The ALR facility has design capacity of 60,000 tubular fluorescent lamps per day and 25,000 HID lamps per day. The ALR process utilizes equipment designed and manufactured by USA Lights, Inc.

DCN FLEP-00205

COMMENTER Pacific Gas and Electric Company

SUBJECT BAK

COMMENT PG&E is the largest investor owned gas and electric utility in the United States, serving a population of 11.8 million people in California within an area of approximately 96,000 square miles. In addition to serving the gas and electric needs of our customers, PG&E actively participates in several Demand Side Management (DSM) programs to facilitate energy conservation measures that bring about lower energy usage by PG&E's power plants resulting in lower rates for our customers.

DCN FLEP-00206

COMMENTER Cornhusker Public Power District

SUBJECT BAK

COMMENT The Cornhusker Public Power District is located in the State of Nebraska and serves a five county area with 7,790 customers. Being a public utility district, we operate on a not-for-profit basis.

DCN FLEP-00208

COMMENTER Safety-Kleen Corporation

SUBJECT BAK

COMMENT Safety-Kleen is the world's largest recycler of solvents and other contaminated fluids, providing environmentally beneficial waste management services to nearly 400,000 customers in the U.S. While Safety-Kleen offers a range of waste recycling and energy recovery services, we specialize in servicing smaller businesses and smaller waste generators. Approximately 95 percent of our customers are small quantity generators (100 to 1,090 kg/mo) or conditionally exempt small quantity generators (less than 100 kg/mo). Because of the substantial paperwork burden on the small businesses that constitutes the vast majority of our customer base, Safety-Kleen often provides implementation guidance on manifesting, LDR notices and waste analysis information as a part of our service. The majority of the waste streams accepted by Safety-Kleen are handled through our 182 accumulation/collection facilities (branches). The majority of the waste materials entering the Safety-Kleen system are recycled into usable products (e.g., parts washer solvent, paint thinner, motor oils etc.). Safety-Kleen has recently entered into the business of recycling silver from photo processing wastes, and will pursue other opportunities for recycling and reclamation of waste materials.

DCN FLEP-00209

COMMENTER Lincoln Electric System

SUBJECT BAK

COMMENT The Lincoln Electric System (LES) is a publicly owned and operated municipal electric utility with sole service responsibility in and around Lincoln, Nebraska. LES has over 98,000 customers with a summer peak load of 545 MW. LES would like to submit comments in reference to Docket Number F-94-FLEP-FFFF, 40 CFR Parts 260, 261, and 273, 'Proposed Rule for Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury- Containing Lamps,' Federal Register, Vol. 59, No. 143, Wednesday, July 27, 1994.

DCN SCSP-00209

COMMENTER Eastman Chemical Company

SUBJECT BAK

COMMENT Eastman Chemical Company (ECC) is a producer of chemicals, fibers, and plastics headquartered in Kingsport, Tennessee. Throughout its manufacturing and support operations, ECC generates a number of solid wastes which may potentially be impacted by the proposed "universal waste" rule.

DCN FLEP-00211

COMMENTER Active Electric Supply, Inc.

SUBJECT BAK

COMMENT Active Electric Supply; Inc. has been an electrical distributor in Central Florida for eleven years. Our core business is selling large lamps (incandescent, fluorescent and HID) to the hospitality industry.

DCN FLEP-00212

COMMENTER Pennzoil Company

SUBJECT BAK

COMMENT Pennzoil Company is a natural resources company engaged, with its subsidiaries, in the exploration, production, refining, and marketing of petroleum products; and the operation of fast lube Facilities.

DCN FLEP-00213

COMMENTER Consolidated Edison Company (Con Edison)

SUBJECT BAK

COMMENT Submitted herein are comments by the Consolidated Edison Company of New York, Inc. ("Con Edison" or "Company") on the July 27, 1994 EPA proposed rule concerning management and disposal of mercury-containing lamps. Con Edison is a privately owned electric utility servicing the City of New York and most of Westchester County, New York.

DCN FLEP-00214

COMMENTER American Municipal Power-Ohio, Inc.

SUBJECT BAK

COMMENT American Municipal Power (AMP-Ohio) is the non-profit trade association and wholesale power supplier for 77 of Ohio's 84 municipal electric systems. AMP-Ohio, its members and their commercial/industrial customers generate spent light bulbs as part of routine maintenance and Demand-Side Management Relamping Programs

DCN FLEP-00215

COMMENTER Sterling Chemicals, Inc.

SUBJECT BAK

COMMENT Sterling Chemicals, Inc. ("Sterling") is pleased to submit these comments on EPA's proposed rulemaking concerning regulation of the disposal of mercury-containing lamps. 59 Fed Reg. 38,288 (July 27, 1994). Sterling owns and operates a chemical manufacturing plant in Texas City, Texas. Sterling's plant has in service, across its facility, about 10,000 fluorescent and 2,000 other high-intensity discharge ("HID") lamps. Sterling-replaces close to 5,000 of these lamps per year and thus is keenly interested in EPA's proposal.

DCN FLEP-00217

COMMENTER Lighting Management, Inc.

SUBJECT BAK

COMMENT My name is Timothy J. Schneider and I am the owner/Director of Operations of Lighting Management, Inc. We are a small lighting management firm with 31 employees and 3 million dollars in sales per year. We are responsible for removing and disposing of lamps in the quantitative vicinity of 200,000 units throughout the New England/Metro NY area per year.

DCN FLEP-00221

COMMENTER Broadway Lighting Services

SUBJECT BAK

COMMENT Established in 1936, Broadway Lighting has been dedicated to the lighting industry. During our two generations of leadership, we have serviced over a million lights with one concept in mind, doing what is right for the customer and setting an example of professionalism in the industry.

DCN FLEP-00222

COMMENTER Columbus Southern Power & OH Power Co.

SUBJECT BAK

COMMENT The following comments are submitted on behalf of Columbus Southern Power Company and Ohio Power Company regarding the regulation of spent lighting wastes. Columbus Southern Power Company and Ohio Power Company (CSP/OPCo) are Ohio-based operating companies of American Electric Power (AEP).

DCN FLEP-00223

COMMENTER Owens-Corning Fiberglass Corporation

SUBJECT BAK

COMMENT I am an Advanced Environmental Specialist with Owens Corning Fiberglass Corporation. My responsibilities include providing hazardous waste disposal guidance to all of the company's manufacturing facilities. Owens Corning is a global corporation with 53 domestic manufacturing facilities, and a current employee level of 16,600 people worldwide. We are committed to being good environmental stewards by employing a common standard of environmental excellence wherever we operate in the world. We are also committed to pollution prevention as guided by the following hierarchy: 1. Source reduction, 2. Recovery and reuse; and 3. Recycling and reclamation. Our plants generate a large amount of used fluorescent light bulbs each

year and as such we are extremely interested in the regulations affecting the disposal of mercury containing lamps because we are looking for ways to recycle in accordance with this hierarchy.

DCN FLEP-00224

COMMENTS Amtech Lighting Services

SUBJECT BAK

COMMENT I would first like to take this opportunity to introduce Amtech Lighting Services to you. We are one of the nations leading lighting management companies. Since 1957, Amtech Lighting Services provides comprehensive lighting services which include lighting maintenance contracts for all types of lighting, both interior and exterior, as well as complete electrical sign repair and maintenance. Our planned lighting management programs include periodic group relamping and cleaning of fixtures, as well as designing an energy efficient and cost effective retrofit for our customers lighting system that will provide the highest quality of light along with the most energy efficient equipment. Amtech Lighting operates branch locations coast-to-coast, serving thousands of customers nationwide, anywhere in the continental United States. Amtech Lightings' Family of Services offers a complete analysis of our customers lighting system by one of our Certified Lighting Management Consultants as well as retrofit installation teams and service technicians who are trained and certified by Nalmco (The National Association of Lighting Management Companies) formal certification program. We also have on staff licensed electricians. All of our employees are drug tested and have completed rigorous safety training. Amtech Lighting as a lighting maintenance contractor is the nations largest end user of lamps and ballasts along with most other general lighting products.

DCN FLEP-00225

COMMENTS Imperial Lighting Maintenance Company

SUBJECT BAK

COMMENT Our company, Imperial Lighting Maintenance Company, is one of the largest, independently-owned, exclusive lighting maintenance companies in the United States and have been in business since 1973. We operate primarily in the Chicago Metropolitan Area within a radius of 75 miles from downtown Chicago. We are

presently employing 60 lighting technicians on a full-time basis, and more on a part-time basis. We carry a 2A1 Dun and Bradstreet rating. We not only purchase over a half million dollars worth of lamps yearly, but also handle at least an equally large number of lamps that are purchased by many of our customers such as Walgreen Drug Stores, and Jewel Foods.

DCN FLEP-00226

COMMENTS FMS Lighting Management Systems, Inc.

SUBJECT BAK

COMMENT Please allow me to introduce you to FMS Lighting Management Systems, Inc. We were incorporated in 1958 domicile in the State of Mississippi. We are a lighting management company with annual sales of 3,000,000.00, employment of 35 permanent and 20 temporary employees, working in the southeastern part of the United States. We have completed several large lighting retrofit projects for different government agencies.

DCN FLEP-00227

COMMENTS Page Electric Utility

SUBJECT BAK

COMMENT Page Electric Utility is a municipally-owned utility that was established in 1986. We serve approximately 3100 customers in Page, Arizona and selected surrounding areas. Our revenues are about \$5.5 million. The following are the comments of Page Electric Utility on the U.S. Environmental Protection-Agency's proposed rules governing lighting waste. The proposed regulation is found at 59 Federal Register 38288-90, July 27, 1994.

DCN FLEP-00228

COMMENTS STAPPA/ALAPCO

SUBJECT BAK

COMMENT On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), we are providing you with comments on the proposed rules for Hazardous Waste Management Systems: Modification of the Hazardous Waste Program; Mercury-Containing Lamps, published in the Federal Register on July 27, 1994 (59 FR 38288). STAPPA and ALAPCO are the two national associations of state and local air pollution control

officials.

DCN FLEP-00229

COMMENTER Global Recycling Technologies, Inc.

SUBJECT BAK

COMMENT Global Recycling Technologies, Inc. is providing the following information to assist the Agency in formulating a policy that best serves the protection of human health and the environment, fosters economic incentives to business, and is in harmony with Administrator Browner's newly announced "Common Sense Initiative." The Agency asked several questions in the Federal Register, some which were specifically directed to people/Companies with considerable experience in managing spent lamps containing mercury. As a company that has received and processed over 2 million lamps over a two year period, we are pleased to assist by providing the attached information.

DCN FLEP-00230

COMMENTER BellSouth Corporation

SUBJECT BAK

COMMENT The following comments are submitted on behalf of BellSouth Corporation, the holding company for BellSouth Telecommunications, whose primary business is providing local telephone service to the nine (9) southeast regional states.

DCN FLEP-00234

COMMENTER Minnesota Mining and Manufacturing (3M)

SUBJECT BAK

COMMENT Minnesota Mining and Manufacturing (3M) has more than 160 operations located in 38 states. The operations, which range from small sales offices to complex manufacturing facilities, total more than 31 million square feet in area. Approximately 120,000 spent fluorescent lamps are generated each year through routine maintenance operations or relamping projects. 3M is committed to the protection of the environment. In 1991, 3M became a Partner in the United States Environmental Protection

Agency's (EPA's) Green Lights program. Thus far, 3M has completed 70% of the lighting surveys and over 57% of the identified projects are either underway or completed. 3M has reviewed the proposed rule for mercury-containing lamps which was published in the Federal Register on Wednesday, July 27, 1994 (FR 38288), and have several concerns with the proposal. 3M is offering the following comments for consideration by EPA before this rule is made final.

DCN FLEP-00235

COMMENTER N'novated Concept Systems

SUBJECT BAK

COMMENT At NCS, our experiences over the past few months have led us to believe that only after a sufficiently well-designed, funded and UNIVERSALLY implemented policy is in place, one that contains a solid infrastructure that facilitates the testing, disposal and/or-recycling of mercury-containing lamps on the Federal and the state levels, can the lighting and energy management industry continue to operate efficiently and profitably for ourselves, and for our customers.

DCN FLEP-00236

COMMENTER Conservation Lighting, Inc.

SUBJECT BAK

COMMENT Conservation Lighting Company is a Lighting Management Company that visits every one of our accounts at least once per month to see that they have all their lighting operating at peak efficiency. We train or have trained our people to the latest technologies available to help our Customers maintain their stores at peak efficiency. We have attended the GE Lighting Training School in Cleveland, Ohio., The Sylvania Lighting School in Danvers Massachusetts., The Philips Lighting School in New Jersey. We are members of NALMCO (International Association of Lighting Management Companies.) and take great pride in trying to maintain the highest standards in All Environmental and Safety Conditions. We have 18 people employed and handle around 70,000 lamps per year through our doors. We service around 348 chain stores throughout Maine, New Hampshire and

Northern Massachusetts.

DCN FLEP-00237

COMMENTS Sherry L. Schilling

SUBJECT BAK

COMMENT As a concerned citizen of Louisiana I would like to offer my comments on the proposed ruling for mercury containing waste lamp management.

DCN FLEP-00238

COMMENTS Energy Specialties, Inc.

SUBJECT BAK

COMMENT Energy Specialties, Inc. (ESI) is a five year old energy services company that specializes in energy conservation projects for lighting and energy controls. We do business in the New York tri state area and have serviced hundreds of businesses over the last 60 months.

DCN FLEP-00239

COMMENTS National Sign Association

SUBJECT BAK

COMMENT Please accept the enclosed comments from the National Electric Sign Association regarding the Proposed EPA Regulations Modifying Lamps' Hazardous Waste Program. The National Electric Sign Association (NESA) is an 50 year old trade association representing the major sign companies in the United States who produce signs that use a minuscule portion of the lamps in question in the proposed regulations. The costs and recorded keeping of these proposals on our industry would be extremely burdensome considering the small part our manufacturers contribute to the perceived problem. We would welcome the opportunity to further discuss our concerns should you desire a meeting after reading our comments.

DCN FLEP-00239

COMMENTER National Sign Association

SUBJECT BAK

COMMENT The United States' sign industry, consisting of about 4,000 firms, is a \$3.4 billion dollar a year industry, providing over-55,000 jobs throughout the United States. The National Electric Sign Association ("NESA) was created in 1944 to serve and promote the interests of the on-premise sign industry. It is the largest sign association of its kind, and represents over 900 manufacturers, installers, users, and suppliers of on-premise sign products. Members belong to all sectors of the sign industry -- interior and exterior, graphic as well as electric.

DCN FLEP-00240

COMMENTER Luminaire Service, Inc.

SUBJECT BAK

COMMENT Luminaire Service, Inc. is a lighting management company specializing in energy reducing lighting retrofits for businesses of all sizes and general lighting maintenance service in the midwest. Our territory includes the states of Indiana, Michigan, Illinois, Ohio and Kentucky. In a typical year, we provide service to approximately 2,000 facilities, which account for about 300,000 lamps per year to be disposed of.

DCN FLEP-00241

COMMENTER Lighting Solutions

SUBJECT BAK

COMMENT As a lighting management professional I am writing to express my concern over the proposed rule changes in lamp disposal regulations. I currently hold both a CLEP and a CLMC designation. My wife is a registered nurse and as a clinical educator is well versed in the OSHA standards in hospitals. Our combined body of knowledge led to the writing of this letter.

DCN FLEP-00242

COMMENTER Murphy Electric Maintenance Company

SUBJECT BAK

COMMENT Since Murphy Electric Maintenance Co. was formed in 1958, we have been actively managing the lighting systems for business

in the Santa Barbara area. We are a member of the International Association of Lighting Management Companies since 1963, and have been a Green Light Lighting Management ally since 1991. In 1969, there was oil spill off our coast killing many animals that helped shape the environmental movement.

DCN FLEP-00243

COMMENTER Recycling Advocates of Middle Tennessee

SUBJECT BAK

COMMENT RAM is a nonprofit corporation chartered in Tennessee with the following Mission Statement: "RAM is a research and education-based group of citizens which advocates the development of recycling techniques that foster industrial improvement, new jobs, prosperity, awareness, health, and a cleaner environment, and eliminate landfilling." RAM is represented by contact-persons in 11 counties.

DCN FLEP-00245

COMMENTER American Iron and Steel Institute

SUBJECT BAK

COMMENT The American Iron and Steel Institute (AISI) is pleased to have the opportunity to provide these brief comments on the proposed rule relating to the management and disposal of mercury-containing lamps as published in the July 27, 1994, issue of the Federal Register at page 38288. AISI is the principal trade association of the North American iron and steel industry and has approximately 40 U.S. member companies that represent approximately 70% of the nation's steelmaking capacity.

DCN FLEP-00246

COMMENTER Efficient Lighting and Maintenance, Inc.

SUBJECT BAK

COMMENT Efficient Lighting performs indoor and outdoor lighting maintenance in the states of Connecticut and New York. We have one facility in Connecticut comprised of office and warehouse space of 3000 square feet. There are seventeen employees; four office/administrative and thirteen technicians. On an average we service 200 facilities (customers) per year using \$140,000 worth of lamps.

DCN FLEP-00247

COMMENTER Total Lighting Service

SUBJECT BAK

COMMENT Total Lighting Service is involved in Ultrasonic Cleaning, Lighting Maintenance, Electrical, Emergency Lighting, and Energy Services. We've been in business for 2 years. Our services are mainly within Connecticut. We currently service over 70 facilities. Our business requires us to handle approximately 50,000 lamps per year.

DCN FLEP-00249

COMMENTER CVM Electric, Inc.

SUBJECT BAK

COMMENT CVM Electric, Inc. is a third generation electrical contracting firm. We currently have two divisions, Electrical Construction and Lighting Services. We serve primarily commercial and industrial customers within the State of New York. Our customers change out over 500,000 lamps per year.

DCN FLEP-00250

COMMENTER International Assn. of Lighting Man. Co.

SUBJECT BAK

COMMENT The International Association of Lighting Management Companies (NALMCO) is made up of lighting management and related companies. Our current membership is 125, representing all 50 states and Puerto Rico. Among the most important areas of education we provide our members are energy reduction and lamp disposal. The association maintains contact with government and regulatory agencies as well as other lighting and energy-related organizations to insure our members have the latest information available to assist them in implementing their plans and policies. NALMCO is constantly hearing from our members that they have difficulty in obtaining consistent advice from, regulatory agencies regarding proper lamp disposal procedures. Each government agency has a different interpretation of requirements, causing our member companies to feel uncomfortable about compliance.

DCN FLEP-00251

COMMENTER Nelson Electric Company

SUBJECT BAK

COMMENT Nelson Electric Company is an electrical contractor based in Cedar Rapids, Iowa and works throughout the state of Iowa. We have a Lighting Management Division which makes up 20% of our volume. We, employee 45 employees and handle 20,000 plus fluorescent and H.I.D. lamps per year.

DCN FLEP-00254

COMMENTER Lymlights, Inc.

SUBJECT BAK

COMMENT My company is involved in energy conservation projects that include the replacement of old technology fluorescent ballasts and lamps. We contract for the disposal of ballasts only with companies that comply with government regulations.

DCN FLEP-00257

COMMENTER Tri-County Lighting Services, Inc.

SUBJECT BAK

COMMENT Tri-County Lighting Services, Inc. is a full service lighting and sign maintenance company, operating under a California C-10 electrical contractors license. We primarily cover the Southern California area, but we also retain business in other states as well. Employing in excess of ten people, and handle over 100,000 lamps a year. Founded in 1979. we are a family owned and operating business, conscious of the concerns with the protection and preservation of our environment. Over the years we have made necessary revisions because of the growth of our company, and we believe that by voicing our concerns and goals, we are speaking for many others in the lighting industry.

DCN FLEP-00258

COMMENTER Colorado Lighting, Inc.

SUBJECT BAK

COMMENT I would like to introduce our company and the reasoning we are commenting on the F-94-FLEP-FFFFF, EPA RCRA Docket (OS-305), we

are in the Lighting Maintenance and Management business. Our primary efforts are towards the maintenance of large lighting systems and heavily involved in the retrofit market. Our company employs thirty different individuals. We have service trucks that do maintenance and management of lighting systems throughout the State of Colorado. We handle in the neighborhood of one million dollars worth of lighting materials in a given year. We service approximately 550 locations on a monthly contract basis and another 400-500 customers throughout the month on an as needed time and material basis.

DCN FLEP-00259

COMMENTS Cherry City Electric, Inc.

SUBJECT BAK

COMMENT Upon being signatory to the EPA GREEN LIGHTS PROGRAM I was extremely pleased and excited to propose that Cherry City Electric join this creative and visionary program. My ownership agreed and we have embarked on the concept of GREEN LIGHTS with enthusiasm. My division of Cherry City Electric specifically promotes the installation of energy efficient lighting retrofits and the resulting training, vision, and guidelines of the GREEN LIGHTS PROGRAM has helped make our business grow and evolve into a leading lighting services company in the state of Oregon. Currently the company employs 190 people and is exposed to many opportunities for the Lighting Services Division to promote energy efficiency through lighting design and retrofit.

DCN FLEP-00260

COMMENTS Salt River Project

SUBJECT BAK

COMMENT The Salt River Project ("SRP") is providing the following comments in response to EPA's proposed rulemaking in Docket No. F-94-FLEP-FFFFF, Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps; Proposed Rule (59 FR 38288 (July 27, 1994)). SRP is a public power utility which serves the metropolitan Phoenix, Arizona area. SRP is a member of the Utility Solid Waste Activities Group ("USWAG"), which is an informal consortium of the Edison Electric Institute, the American Public Power

Association, the National Rural Electric Cooperative Association, and approximately eighty privately and publicly-owned electric utilities.

DCN FLEP-00262

COMMENTER OG&E Electric Services

SUBJECT BAK

COMMENT OG&E Electric Services ("OG&E") appreciates the opportunity to comment on the U.S. Environmental Protection Agency's ("Agency") Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury-Containing Lamps; Proposed Rule, as published in the July 27, 1994 Federal Register (59 FR 38288). As a publicly-owned electric utility currently involved in several energy conservation programs, OG&E is keenly interested in the proposed rulemaking and its effect on energy-efficient lighting programs including the Agency's-voluntary program known as Green Lights. The final outcome of this rulemaking, in turn, will determine OG&E's participation in Green Lights or any other energy- efficient lighting program.

DCN FLEP-00263

COMMENTER Lighting Service, Inc.

SUBJECT BAK

COMMENT Lighting Service, Inc. is an established company with 48 years of experience. We are a lighting management company and we serve the St. Louis metropolitan area. With our staff of experienced professionals, we offer replacement of interior lamps and ballasts and cleaning of interior fixtures. We currently employ nine people.

DCN Lighting Maintenance, Inc.

COMMENTER FLEP-00264

SUBJECT BAK

COMMENT First and foremost, we would like to thank you for including our opinion on the Lamp Disposal Proposal. Lighting Maintenance Inc. has been a well established company for many years. There are approximately 15 employees. We handle numerous amounts of lamps, in which we service approximately 150 customers per year. We are based and operate in the State of Michigan and on occasion we

service customers in the neighboring Great Lake States.

DCN FLEP-00266

COMMENTER Power Savers, Inc.

SUBJECT BAK

COMMENT Power Savers, Inc. is a lighting management and power quality electrical contractor that does in excess of 5 million dollars in sales annually. We employ 35-45 people and dispose of in excess of 100- 150 thousand fluorescent lamps per year.

DCN FLEP-00267

COMMENTER ABD Lighting Management Co., Inc.

SUBJECT BAK

COMMENT Our company has been in existence for almost a quarter century. We are the only full time lighting management company in our area. Our customer base includes urban, suburban, and rural commercial and industrial establishments. With a staff of 20 people, we handle in excess of 150,000 lamps per year. Transportation and additional processing of these lamps is not economical nor cost effective for our customers.

DCN FLEP-00269

COMMENTER Primo Lighting Management

SUBJECT BAK

COMMENT Primo Lighting Management is a Mid-Atlantic based full service lighting Consulting/Contracting company. We concentrate our efforts on making existing commercial, industrial, and retail buildings more energy efficient. Recently our efforts have been recognized through the EPA's Green Lights Program which awarded our company the "Lighting Ally Of The Year" award for 1994. In the process of our day to day business we remove thousands of lamps and lighting ballast annually from our customers facilities. Although the EPA guidelines regarding ballast containing PCB contaminates are very clearly outlined, the lamp disposal issues remain as a major area of concern for our business as well as the industry as a whole.

DCN FLEP-00270

COMMENTER The Barney Roth Company

SUBJECT BAK

COMMENT The Barney Roth Company is a fifty year old Lighting Management Company involved in the installation of both indoor and outdoor lighting systems. Our services are provided in the Greater Delaware Valley area, including Southeastern Pennsylvania, Southern New Jersey and Northern Delaware. We service hundreds and thousands of fluorescent and HID lamps annually and are heavily involved in the energy management aspect of our industry.

DCN FLEP-00271

COMMENTER RTC Marketing of Ohio

SUBJECT BAK

COMMENT MY COMPANY IS ACTIVELY INVOLVED IN LIGHTING MAINTENANCE AND RETROFITTING OF FACILITIES TO COMPLY WITH THE GREEN LIGHTS PROGRAM. WE ARE A SMALL COMPANY THAT OPERATES IN TWO STATES. WE WORK FOR NINE GROCERY STORES ON A MONTHLY BASIS AND DO RETROFITS FOR OTHERS. WE HANDLE ABOUT 30,000 LAMPS ANNUALLY.

DCN FLEP-00272

COMMENTER Detroit Edison Company

SUBJECT BAK

COMMENT Detroit Edison greatly appreciates this opportunity to provide input to the proposed rules on the Hazardous Waste Management System for Mercury Containing Lamps, published in the Federal Register on July 27, 1994 (Fed Reg. vol. 59, No. 143, p. 38287). The Company commends the Agency for conducting such a rulemaking and encourages it to rapidly finalize the rules so as to provide clear guidance on the disposal of lighting waste and, hopefully, provide a system that will encourage the environmentally beneficial rapid change out of inefficient lighting. Detroit Edison is a member of the Utility Solid Waste Activities Group(USWAG) and participated in the development of and fully supports the comments submitted by that group. In addition, the Company provides the following comments to provide an individual utility perspective.

DCN FLEP-00273

COMMENTER Lighting Maintenance, Inc.

SUBJECT BAK

COMMENT We as a Lighting Management firm are concerned about the positions the EPA has taken about regulations as it relates to presumed hazardous waste in our industry for lamps and ballasts. We have twenty trucks on the street, employ fifty-five people and operate a multi million dollar business in the Chicago area that could be greatly curtailed if unnecessary and high costs for very minimal benefits are legislated.

DCN FLEP-00274

COMMENTER Master Lighting Service Co., Inc.

SUBJECT BAK

COMMENT Master Lighting Service Company Is a full - service lighting maintenance company. Approximately 40% of our business is monthly route service and the other 60% is energy retrofit work, Some of which has been EPA Green Lights projects. MLS currently employs 25 people, operating primarily in Ohio only. MLS presently services over 100 different locations. Along with the retro projects, MLS uses over 50,000 lamps annually.

DCN FLEP-00275

COMMENTER Aetna Corporation

SUBJECT BAK

COMMENT Aetna Corporation is a Cambridge-based company serving commercial, industrial and large retail chains facilities in eleven northeast states. Our services include lighting upgrade feet group relamping of facilities, and maintenance of lighting systems. These activities generated 362,500 spent lamps in the last twelve months.

DCN FLEP-00276

COMMENTER Nine West Technologies, Inc.

SUBJECT BAK

COMMENT Nine West Technologies is an authorized recycler of High Intensity Discharge (HID) lamps. Our main plant is located in Nashville.

DCN FLEP-00277

COMMENTER Taunton Municipal Lighting Plant

SUBJECT BAK

COMMENT These are the Taunton Municipal Lighting Plant's (TMLP) comments on the U.S. Environmental Protection Agency's proposed rules governing lighting waste. The proposed regulation is found at 59 Federal Register 38288-90, July 27, 1994. The TMLP is a publicly owned electric utility which services over 30,000 customers. Being publicly owned, TMLP operates on a not-for-profit basis.

DCN FLEP-00278

COMMENTER Imperial Lighting Maintenance Co.

SUBJECT BAK

COMMENT Our company, Imperial Lighting Maintenance Company, is one of the largest, independently-owned, exclusive lighting maintenance companies in the United States and have been in business since 1973. We operate primarily in the Chicago Metropolitan Area within a radius of 75 miles from downtown Chicago. We are presently employing 60 lighting technicians on a full-time basis, and more on a part-time basis. We carry a 2A1 Dun and Bradstreet rating. We not only purchase over a half million dollars worth of lamps yearly, but also handle at least an equally large number of lamps that are purchased by many of our customers such as Walgreen Drug Stores, and Jewel Foods.

DCN FLEP-00279

COMMENTER Consumers Power Company

SUBJECT BAK

COMMENT Consumers Power Company (CPCO) is Michigan's largest public utility, America's 13th largest investor-owned electric company and sixth-largest gas distribution company. CPCO provides electricity and/or natural gas service to approximately 6 million people in all of the 68 counties in the Lower Peninsula of Michigan. In addition to our residential customers, approximately 170,000 commercial and industrial customers are provided electric service by Consumers Power. In order to effectively provide reliable electric and/or gas service to our customers, CPCO operates more than 125 facilities throughout the Michigan's Lower Peninsula. Through prudent waste management and minimization practices, the majority of these facilities meet RCRA criteria to be categorized as conditionally-exempt

generators. These facilities have the potential to annually produce 70,000 to 90,000 mercury- containing lamps.

DCN FLEP-00280

COMMENTER Marathon Oil Company

SUBJECT BAK

COMMENT Marathon Oil Company is pleased to provide comments on the modification of the hazardous waste program related to mercury-containing lamps that is proposed in the July 27, 1994 Federal Register. Marathon consists of exploration, production, pipeline, refining, and marketing sectors in the domestic and International petroleum industry. Usage of mercury-containing lamps is widespread within Marathon, in both interior lighting requirements and exterior lighting needs. In fact, Marathon participates in the EPA's Green Lights Program. As a part of that Program, it was estimated that Marathon disposes of 40,000 to 45,000 fluorescent lamps each year.

DCN FLEP-00281

COMMENTER Michigan Dept. of Natural Resources

SUBJECT BAK

COMMENT The attached letter from Ohio EPA describes concerns on the proposed management scenarios for mercury containing lamps. This letter was not received until after the final letter from the Great Lakes States Air and Water Director's was sent out on November 22, 1994. Therefore, these comments were not incorporated into the letter dated November 21, 1994 from the Michigan Department of Natural Resources Air and Water Directors on behalf of the Great Lakes States Air and Water Directors.

DCN FLEP-00281

COMMENTER Michigan Dept. of Natural Resources

SUBJECT BAK

COMMENT Ohio EPA has not yet finalized our comments to the July 27, 1994 Federal Register on the proposed management scenarios for mercury containing lamps. Ohio EPA, is in general support of the Universal Waste Rule (UWR) option. However, the rule as presently written needs some significant changes before we can

give it our full support. For this reason, and the reasons set forth below, Ohio EPA is not prepared to endorse the position offered by the Michigan Department of Natural Resources, in your letter dated October 18, 1994. We acknowledge that your draft letter requested comments by November 1 and that "lack of any response will indicate support of this draft letter." For reasons I am sure that you will understand, Ohio EPA's lack of a timely response cannot be deemed concurrence with the policy recommendations offered by you on October 18.

DCN FLEP-00282

COMMENTER Michigan Dept. of Natural Resources

SUBJECT BAK

COMMENT On behalf of the Great Lakes States Air and Water Directors, we are pleased to submit comments on the proposed rules for the management of mercury-containing lamps (Federal Register Vol. 59, July 27, 1994) . The Great Lakes States' Air and Water Directors support only the options which would require recycling of mercury-containing lamps. We do not support the option of a conditional exemption from Subtitle C of the Resource Conservation and Recovery Act (RCRA) if the exemption would allow disposal in landfills regulated under subtitle D. Mercury containing lamps should either be included in the "Universal Waste Rule" under subtitle C of RCRA, or if exempted from that rule, regulation under subtitle D of RCRA should be conditional upon the lamps being recycled.

DCN FLEP-00286

COMMENTER Creative Lighting, Inc.

SUBJECT BAK

COMMENT I am writing my comments to you on these proposed rule changes as I am the President and General Manager of Creative Lighting Inc. a California based company which has been in the lighting maintenance, service, and lighting design and construction industry since 1978. We employ approximately 18 people, with annual sales of 4 to 5 million dollars per year and use 1 to 2 million dollars per year in the lamps covered by this rule change. As an active "Green Lights Alley" we service a customer

base of nearly 10 million people and cover a large geographic area of Southern California.

DCN FLEP-00289

COMMENTER Fluorescent Maintenance Company

SUBJECT BAK

COMMENT Fluorescent Maintenance Company has maintained commercial, industrial, and institutional lighting systems in the Denver metro area since 1948. We service all kinds of indoor and outdoor . lighting: incandescent, fluorescent, HID, neon, and emergency lighting. This letter is a response to the EPA request for comments on the proposed rules for HID and fluorescent lamp disposal.

DCN FLEP-00291

COMMENTER A-1 Lighting Service, Inc.

SUBJECT BAK

COMMENT We are a small business that performs lighting maintenance and electrical repairs. Inside lighting systems, emergency lighting, parking lot lighting, outside security lighting and sign repairs are some of the areas we specialize in. A-1 Lighting employs thirteen (13) people and service approximately three hundred (300) businesses.

DCN FLEP-00294

COMMENTER El Paso Natural Gas Company

SUBJECT BAK

COMMENT El Paso is a major interstate natural gas transmission company with operations in Texas, Oklahoma, Arizona, New Mexico, and Colorado. El Paso uses mercury-containing lamps at various locations throughout its system.

DCN FLEP-00295

COMMENTER Texas Instruments, Inc.

SUBJECT BAK

COMMENT Texas Instruments Incorporated (TI) submits the following comments on EPA's recently proposed Mercury-Containing Lamp rule (59 FR 38288 07/27/94). TI is a fortune 100 company involved in the manufacture of electrical and electronic products with

manufacturing locations worldwide. In the U.S., TI has operations in Texas, Massachusetts, Michigan, Maryland, and Kentucky. Currently TI is classifying its spent mercury-containing lamps as hazardous waste and is recycling these lamps.

DCN FLEP-00297

COMMENTS Florida Dept. of Environ. Protection

SUBJECT BAK

COMMENT Enclosed are our comments on the EPA's proposed rule on "Modification of the Hazardous Waste Program; Mercury-Containing Lamps", which was published on July 27, 1994, pp. 38288 et seq. This proposed rule presents two options for the management of mercury-containing lamps, including fluorescent and high intensity discharge (HID) lamps, that are being considered as alternatives to full RCRA Subtitle C regulation. The Department is especially interested in this proposed rule since the 1993 Florida Legislature has directed it to adopt rules pertaining to the "Environmentally Sound Management of Mercury-containing Devices and Lamps", codified under Section 403-7186, Florida Statutes. We are currently in the process of rulemaking and have enclosed copies of the statutes, our draft rule and the background document for your information. This is another step in addressing Florida's problem with mercury contamination in its environment.

DCN FLEP-00298

COMMENTS New York Power Authority

SUBJECT BAK

COMMENT NYPA's corporate environmental policy is to support and endorse environmentally responsible decision making with respect to all of our operations, particularly in the area of recycling and disposal of all materials potentially harmful to human health and the environment. In many instances we have made a conscientious effort to take measures well beyond state and federal regulatory requirements to ensure the safe recycling and disposal of waste substances. NYPA is one of the leading utilities in the US in the implementation of environmentally benign technologies and energy efficiency programs and we would like to continue to play a leadership role in the structuring of

a sustainable energy future for the US.

DCN FLEP-00299

COMMENTER Assn. of Electric Cooperatives

SUBJECT BAK

COMMENT On behalf of the 15 members of the Virginia, Maryland & Delaware Association of Electric Cooperatives, we appreciate the opportunity to comment on the proposed rules entitled "Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury - Containing Lamps." The Cooperatives applaud EPA's initiative to provide a friendlier environment for the consumer to dispose of mercury - containing lamps. These proposed amendments provide an important element in the successful use of mercury - containing lamps in an energy conservation program.

DCN FLEP-00302

COMMENTER Conserve Electric Company, Inc.

SUBJECT BAK

COMMENT Conserve Electric Company, Inc. is a Pennsylvania based Corporation providing lighting, maintenance service to our customer base located in Western Pennsylvania. The disposal and transportation of spent lamps is a major part of our business. To this end we have the following comments to your pending rule changes on florescent and HID lamp disposal.

DCN FLEP-00303

COMMENTER IllumElex Corporation

SUBJECT BAK

COMMENT IllumElex Corporation is a lighting management company located in Raleigh, N.C. with offices located in Atlanta, GA, Orlando, FL, Houston, TX, and Philadelphia, PA. IllumElex specializes in routine lighting maintenance, group relamp programs and lighting retrofit programs. We are a EPA Green Lights ally and in fact was the first Lighting Management company to become a member of Green Lights. IllumElex Corporation operates in 33 states and Puerto Rico. We have approximately 350 employees who service

15,000 retail and commercial locations each month. We replace approximately 15,000,000 linear feet of florescent lamps and thousands of HID lamps every year.

DCN FLEP-00304

COMMENTS A&K Service Corporation

SUBJECT BAK

COMMENT As a representative of A&K Service Corp., I am writing you to voice my concerns regarding the upcoming legislation involving the disposal of mercury containing lamps. A&K is a lighting management company which serves approximately 31 states. We currently have 76 employees and we service over 4000 business locations per month. Our main focus is repairing and maintaining lighting for these businesses as well as re- lamping and retrofitting these stores to be more energy efficient. We are a participating partner in the Green Lights program and are currently urging our customers to take necessary measures to comply with the guidelines set forth in the program. With that said, I feel that we are more than qualified to comment on this forthcoming legislation.

DCN FLEP-00306

COMMENTS Lighting Maintenance and Service, Inc.

SUBJECT BAK

COMMENT I am writing on behalf of Lighting Maintenance and Service, Inc. (LMS) in Salt Lake City, Utah, in response to the proposed Lamp Disposal Rule Change. LMS is a full service lighting maintenance company servicing the Utah and Idaho areas. Our clients include major retailers (representing local and national interests), large financial institutions, property managers and developers, as well as numerous local small businesses. We employ 12 technicians and handle in excess of 150,000 lamps per year.

DCN FLEP-00308

COMMENTS All-Phase Construction

SUBJECT BAK

COMMENT All-Phase is a company that is progressing in the field of lighting management primarily because it fits into the beliefs of All-Phases principles. It is good for the customer, contractor, the environment, utility companies, manufacture and all

types of businesses.

DCN FLEP-00309

COMMENTER Bethlehem Apparatus Company

SUBJECT BAK

COMMENT Bethlehem Apparatus Company ("Bethlehem"), located in Hellertown, Pennsylvania, is involved in the business of recycling mercury from materials which are characterized as D009, or hazardous waste by virtue of the presence of mercury in the TCLP test. Among the materials Bethlehem recycles are fluorescent and high intensity discharge lights which contain mercury ("Lamps"). Bethlehem is one of only two entities in the United States of America identified in the Mercury Containing Lamps Proposed Rule, 59 F.R. 389288; 389300 (1994) ("Proposed Rule") which recycle mercury from Lamps and reclaimed phosphor powder. Bethlehem employs a mercury retort under full vacuum to recover mercury in an environmentally safe fashion. Bethlehem has direct contracts with both the large quantity generators of Lamps who routinely undertake large scale relampings, including those who are doing so pursuant to EPA's Green Lights Program, and the large waste transport and disposal companies who remove the Lamps from their customers, both large and small quantity generators. In addition, Bethlehem has contracts with many of the 13 facilities in the United States which conduct gross component separation of the Lamps into glass, phosphor powder and aluminum caps. Thus, Bethlehem is in a particularly qualified position to comment on the Proposed Rule, and requests the careful consideration of these comments by the EPA.

DCN FLEP-L0001

COMMENTER Environmental Technology Council

SUBJECT BAK

COMMENT II. STATEMENT OF INTEREST The ETC, the successor-organization to the Hazardous Waste Treatment Council, is a national association of firms that share a commitment to the use of advanced technologies for the recycling, treatment, and disposal of hazardous wastes. ETC's member companies provide a wide spectrum of technologies and services for managing hazardous wastes, including the safe and effective recycling of the mercury, glass, and metal components of used fluorescent lamps. The ETC

has a vital stake in regulations governing the treatment, reclamation, and disposal of hazardous wastes.

DCN FLEP-L0002

COMMENTER Memphis Light, Gas and Waste Division

SUBJECT BAK

COMMENT The following comments are submitted by Memphis Light, Gas and Water Division regarding the U.S. Environmental Protection Agency's (EPA) proposed rules governing lighting waste. The proposed regulation is found in 59 Federal Register 38288-90, dated July 27, 1994. MLGW is a publicly-owned utility providing electric, gas and water service to the residents and businesses of Shelby County, Tennessee. As a division of Memphis city government, MLGW operates on a not-for-profit basis, with local hands controlling the company's policy and service. MLGW provides electric power for more than 375,868 customers. The company is committed to being environmentally conscious in all endeavors and abides by the rules and regulations set by the Tennessee Department of Environment and Conservation. In order to derive the best solution to any problem, MLGW is proactive in working and sharing ideas with other governmental agencies, as is the case in the matter mentioned above.

DCN SCSP-L0003

COMMENTER Coors Brewing Company

SUBJECT BAK

COMMENT Coors Brewing Company (Coors,) is pleased to comment on the Environmental Protection Agency's ("EPA") proposal for modifications to the Hazardous Waste Recycling Regulatory Program. Coors not only produces beer, but also manufactures its own glass bottles and aluminum cans. Due to the nature and location of our businesses, Coors maintains status as large quantity, small quantity and conditionally exempt generators. Coors also maintains a permitted hazardous waste treatment and storage facility. Because of the diverse nature of our business, Coors would be directly impacted by the proposed program.

DCN FLEP-L0005

COMMENTER Massachusetts Energy Efficiency Council

SUBJECT BAK

COMMENT The Massachusetts Energy Efficiency Council (Efficiency Council) is pleased to submit these comments to the EPA regarding its proposed rule for the disposal of spent fluorescent lamps. The Efficiency Council is a business association of the energy efficiency industry. Our membership covers the wide range of firms that manufacture or provide energy efficiency products and services. It includes manufacturers, energy service companies, engineering firms, electrical and HVAC contractors, architects, builders, consultants, and retailers and distributors of energy efficiency products and equipment. Our full members include both lamp manufacturers and lamp recycling firms. Our associate members include electric and gas utilities that operate energy efficiency programs, known as demand-side management (DSM) programs.

DCN FLEP-L0006

COMMENTER National Food Processors Association

SUBJECT BAK

COMMENT The National Food Processors Association (NFPA) provides the following comments on the July 27, 1994 proposed rule for modifying the hazardous waste system for the management of mercury-containing lamps. NFPA is the science-based association of the food industry whose 500 member companies produce the nation's processed-packaged fruits and vegetables juices and drinks, meat and poultry, seafood, and specialty products. NFPA member companies have facilities throughout the United States. A number of NFPA member companies are participants in the EPA "Green Lights" program and support the objective of facilitating expansion of energy saving lighting systems.

DCN SCSP-L0007

COMMENTER Large Public Power Council

SUBJECT BAK

COMMENT MEMBERS OF THE LARGE PUBLIC POWER COUNCIL Jacksonville Electric Authority Memphis Light, Gas and Water Division Knoxville Utilities Board Municipal Electric Authority of Georgia Lower Colorado River Authority Sacramento Municipal Utility District Tacoma Public Utilities Los Angeles Department of Water and Power New York Power Authority Omaha Public Power District

Nebraska Public Power District Public Utilities District 11,
Snohomish County, Washington Salt River Project Seattle City
Light Orlando Utilities Commission South Carolina Public Service
Authority City of Austin Puerto Rico Electric Power

DCN FLEP-L0008

COMMENTS Duke Power Company

SUBJECT BAK

COMMENT Duke Power Company commends the U. S. Environmental Protection Agency on its efforts to facilitate greater participation in energy-efficient relamping programs. Duke Power is a supporter of the Green Lights program and we are encouraged by EPA's efforts to resolve barriers to participation in the program. This initiative is especially critical to Duke Power's continued participation in the Green Lights Program as described in our October 14, 1992 letter to Branch Chief Robert M. Kwartin.

DCN SCSP-L0009

COMMENTS National Electric Manufacturers Assn.

SUBJECT BAK

COMMENT The National Electrical Manufacturers Association (NEMA) is the principal trade association for manufacturers in the electrical industry. NEMA represents over 600 domestic manufacturers of products used in the generation, transmission, distribution, and end-use of electrical energy. NEMA members which manufacture lamps containing mercury comprise over 90 percent of the industry.

DCN FLEP-L0010

COMMENTS United Energy Associates, Inc.

SUBJECT BAK

COMMENT I have been out of the country for the past month and understand that I have passed the deadline for comment on this matter, but here it is, anyway! UEA is a lighting management company primarily focused on the retro- fit of existing lighting systems to more efficient technologies. The results of these conversions is the substantial and measurable reduction of electrical

energy usage ... and, naturally, the corresponding need to generate that additional power.

DCN FLEP-L0012

COMMENTER Navajo Tribal Utility Authority

SUBJECT BAK

COMMENT The Navajo Tribal Utility Authority is the largest Indian owned and operated public utility in the United States. It serves approximately 26,000 customers throughout its Reservation area in the three States of Arizona, Utah, and New Mexico. We hope that these comments are not too late for consideration. Many of the Authority's customers enjoy security lights at extremely remote locations on the Reservation. Thus, the Navajo Tribal Utility Authority feels constrained to provide comments on the Environmental Protection Agency's proposed rules governing lighting waste.

DCN FLEP-00241

COMMENTER Lighting Solutions

SUBJECT BAK

COMMENT Lighting Solutions is a consulting, design, and lighting management firm specializing in lighting system retrofits. It was established in 1986 to focus on growing energy concerns. We have taken a "green awareness" stance supporting EPA's environmental policies.