

US EPA ARCHIVE DOCUMENT

## Summary of Northeast State's Policies Regarding Use of Drum Top Crushers

| State         | Drum Top Crusher Regulations and Policies                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | CESQG Exemptions?                                                                                                                                  | Contact for More Information                                  |
|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| Connecticut   | No crushing without a permit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | No exemption for CESQGs.                                                                                                                           | Ross Bunnell<br>ross.bunnell@po.state.ct.us<br>(860) 424-3274 |
| Maine         | No crushing allowed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | No exemption for CESQGs                                                                                                                            | Stacy Ladner<br>Stacy.a.ladner@maine.gov<br>207 287-2651      |
| Massachusetts | Crushing of lamps is allowed as a "recycling" activity under the Massachusetts Universal Waste rule (a streamlined set of hazardous waste requirements, 310 CMR 30.1034), but the process must separate the crushed material into its component parts (end-caps, glass and mercury/phosphor powder) so that each can be recycled. A drum-style crusher that does not separate the crushed material into component parts for recycling does not satisfy the requirements of this regulation and will be subject to the Massachusetts hazardous waste licensing requirements. Generators who operate drum-style crushers that do not comply with the recycling requirements or are not properly permitted or licensed may be subject to enforcement action. | Yes, CESQGs are exempt from the treatment prohibition and may use DTCs without a permit.                                                           | James Paterson<br>james.paterson@state.ma.us<br>617-556-1096  |
| New Hampshire | Use of a DTC is considered hazardous waste treatment and requires a permit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | No exemption for CESQGs                                                                                                                            | Paul Lockwood<br>plockwood@des.state.nh.us<br>603 271-2956    |
| New Jersey    | Crushing by generators allowed, (with an Air Pollution Control Permit); third parties need a Class D recycling center approval and an Air Pollution Control permit from New Jersey Department of Environmental Protection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | CESQGs that are crushing the bulbs prior to beneficial use or reuse, or recycling or reclamation are exempt from the treatment permit requirement. | Zafar Billah<br>zafar.billah@dep.state.nj.us<br>609-292-9880  |
| New York      | Lamps being managed under the Universal Waste Rule may not be crushed. Crushing is considered a form of hazardous waste treatment, and under ordinary hazardous waste generator regulations, hazardous waste lamps may be crushed only if the process is exempt from hazardous waste treatment regulations (6 NYCRR 373-1.1(d)(1)). Common exemptions that might apply to crushing lamps are: on-site treatment by a CESQG; the first step of a recycling process, if the lamps will be directed to a mercury recycler, or treatment in the tank or container in which the lamps are stored. Generators wishing to use one of the latter two exemptions should seek specific guidance from the Waste Determination & Analysis                             | Yes, CESQGs are exempt and may crush lamps following hazardous waste regulations.                                                                  | John Miccoli<br>jdmiccol@gw.dec.state.ny.us<br>518-402-8633   |

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|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------------------------------------------------------------|
|              | Section. The crushed lamps are usually considered hazardous waste for mercury, and sometimes for lead, and must be handled and disposed of in accordance with normal hazardous waste requirements. |                         |                                                                |
| Rhode Island | No crushing allowed.                                                                                                                                                                               | No exemption for CESQGs | Bev Migliore<br>bmigliol@dem.state.ri.us<br>401 222-4700 x7503 |
| Vermont      | No crushing allowed.                                                                                                                                                                               | No exemption for CESQGs | Peter Marshall<br>peter.marshall@state.vt.us<br>802-241-3868   |