



**POSITION STATEMENT
OF THE
LAMP SECTION
NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION
ON
LAMP WASTE CLASSIFICATION MARKING**

LAMPS WITH GREEN MARKINGS

Green markings, including green lamp etches or green component materials used in lamps, indicate that the marked lamps consistently pass the U.S. Federal EPA Toxicity Characteristic Leaching Procedure (TCLP) test for all substances that were regulated at the time of lamp manufacture.¹ Green lamp markings are not to be used on lamps for any other purpose. The primary purpose for green lamp markings is to facilitate easy identification and separation at the time of disposal.

Manufacturers may include some marking in addition to the green marking to emphasize the TCLP-passing status of the lamp.

LAMPS WITHOUT GREEN MARKINGS

Lamps without green markings may or may not pass the U.S. Federal EPA TCLP test. NEMA recommends that TCLP testing be performed on lamps without green markings in accordance with the applicable NEMA LL series of standards for lamp TCLP testing.

LAMP DISPOSAL REGULATIONS

Lamps which pass the U.S. Federal EPA TCLP test are considered non-hazardous waste in most states. However, state regulations vary and some state waste management regulations are more stringent than federal EPA regulations. Waste generators are responsible for complying with the disposal requirements that are applicable in their State or locality.

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¹ Some Duro-Test brand compact fluorescent lamps manufactured prior to January 1997 are marked in green but were not tested for TCLP compliance.