

How to Dispose of Fluorescent Light Ballast Waste that Contains PCBs

Contact Information

For questions contact your hazardous waste hauler or Ecology's Hazardous Waste Compliance Officer in your region:

Central Regional Office:

509-575-2490

Eastern Regional Office:

509-329-3400

Northwest Regional Office:

206-594-0000

Southwest Regional Office:

360-407-6300

ADA Accessibility

To request an ADA accommodation, contact Ecology by phone at 360-407-6700 or email at hwtrpubs@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.

Ecology works with schools around the state to remove and properly dispose of fluorescent light ballasts (FLBs) containing polychlorinated biphenyls (PCBs). Waste management is a central part of the program. Ecology recommends using the conditional exclusion for PCB waste found in [WAC 173-303-071\(3\)\(k\)\(ii\)](#),¹ which requires managing FLBs containing PCBs under the [Toxic Substances Control Act \(TSCA\) regulations, 40 C.F.R. Part 761, Subpart D](#).² Wastes must be assumed to contain concentrations of 50 ppm or greater PCBs.

A contractor or dangerous waste vendor can help schools with guidance to manage these wastes on-site, and any administrative or record keeping requirements. They can help schools get an EPA/State ID Number, which is required before disposing of FLB waste off site.

Managing FLB waste containing PCBs according to the TSCA subpart D regulations streamlines administrative processes and provides benefits:

- Proper TSCA management conditionally excludes the waste from the majority of the Washington State Dangerous Waste Regulations [WAC 173-303](#),³ if the business meets the specific requirements of WAC 173-303-071(3)(k)(ii).
- Counting and reporting FLB waste with PCBs to Ecology is not required when managed under TSCA Wastes managed under WAC 173-303; Dangerous Waste Regulations must be counted and reported to Ecology.
- Excluded wastes do not affect the generator category of schools.
- PCB-waste managed under TSCA is incinerated, ensuring safe disposal of PCBs.

¹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-071>

² <https://www.ecfr.gov/current/title-40/part-761/subpart-D>

³ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303>

Comparing TSCA and WA state dangerous waste management options

Recommended: [TSCA Storage and Disposal Requirements for PCB-containing FLBs](#)⁴ containing concentrations of greater than 50 ppm PCB.

Schools have one year from the date of generation to send any FLB waste with PCBs to a permitted TSCA incinerator or chemical landfill. Schools must send those FLBs through an authorized transporter using a uniform hazardous waste manifest that includes an EPA/State ID Number.

- Storage time limit: one year (365 day).
- Shipping wastes on manifests: required.
- EPA/State ID Number: required.
- Counting waste volumes towards overall waste generator category: not required if waste is properly managed under conditional exclusion WAC 173-303-071(3)(k)(ii).
- Reporting PCB waste volumes to Ecology: not required.

Alternate Management Approach: Dangerous Waste WAC 173-303 Storage & Reporting Requirements.

- Storage time limit: depends on generator category. May be 90 days, 180 days, or no limit.
- Shipping wastes on manifest: required.
- EPA/State ID Number: required.
- Counting waste volumes towards overall waste generator category: required.
- Reporting PCB waste volumes to Ecology: required.

⁴ <https://www.epa.gov/sites/default/files/2015-08/documents/ballastchart.pdf>