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ORH 6902c

## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

October 30, 1998

Ms. Teresa J. Anderson  
U.S. Army  
Camp Stanley  
Boerne, TX 78015-4800

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
AUD-JKB-69026-10143191

RECEIVED  
NOV - 3 98  
CENTRAL RECORDS

Re: Notification of Recycling Activity, Waste Code Number 10143191  
Technical Analysis File Number 469-98  
Solid Waste Registration Number 69026

Dear Ms. Anderson:

This is to acknowledge the receipt of your October 12, 1998 correspondence in which you notified the Texas Natural Resource Conservation Commission (TNRCC) that Camp Stanley will be recycling its "mercury vapor lamps" (waste code number 10143191) by sending them off-site to an authorized lamp recycler. On behalf of the TNRCC, I wish to thank you and the U.S. Army for this notification.

As I am sure that you know, the responsibility for making an initial hazardous waste determination for a waste is that of the generator of the waste. It is also a generator's responsibility to provide the TNRCC with accurate information regarding whether they are an industrial generator or a non-industrial generator.

Bearing this in mind, I would like to point out that:

- ▶ In the past few years, many manufacturers of mercury lamps have reduced the amount of mercury in their lamps to the point where the lamps are not a hazardous waste because they exhibit the characteristic of toxicity for mercury (see 40 Code of Federal Regulations (CFR) Section § 261.24).<sup>1</sup> However, not all manufacturers have done so. In any case, there is considerable evidence to show that mercury vapor lamps that are manufactured using traditional methods very often exhibit the characteristic of toxicity for mercury.

I am therefore respectfully requesting that you please submit the documentation used to establish that the mercury vapor lamps generated at Camp Stanley are not a hazardous waste for mercury.

<sup>1</sup> Please note that the TNRCC has developed the guidance document, "Guidelines for the Classification & Coding of Industrial Wastes and Hazardous Wastes", RG-22. This document contains extensive excerpts from 40 CFR Part 261. It (as well as most other TNRCC documents) be obtained either from the Internet at: <http://www.tnrcc.state.tx.us/> or from the TNRCC Publications Section at (512) 239-0028. (NOTE: The Publications Section cannot provide regulatory guidance regarding the content of RG-22. If you need such guidance, please contact the Waste Analysis Team at (512) 239-6412).