

INSTRUCTIONS
Mercury-added Product Notification Form for
Lamp Manufacturers Only
Updated August 2008

This Lamp Manufacturers' and Distributors' Mercury-added Product Notification Form is designed for use by manufacturers, distributors, wholesalers, and/or importers that are reporting for the mercury-added lamp products they produce or distribute only. If you fit into this category, follow these instructions and use the associated Mercury-added Product Notification Form.

Please make sure that you are using the correct version of the Mercury-added Product Notification Form.

For manufacturers of other mercury-added products, there are other Mercury-added Product Notification Forms that can be found at <http://www.newmoa.org/prevention/mercury/imerc/notificationforms.cfm>.

Complete and return this Form to:

Interstate Mercury Education and Reduction Clearinghouse
C/o Northeast Waste Management Officials' Association
129 Portland Street, Suite 602
Boston, MA 02114-2014

Contact the Interstate Mercury Education and Reduction Clearinghouse (IMERC) by phone at (617) 367-8558 or email at awienert@newmoa.org with any questions about completing this Form. For further information on the states' Notification requirements, please visit the IMERC Web Page at <http://www.newmoa.org/prevention/mercury/imerc/notification.cfm>

GENERAL INSTRUCTIONS

Who Must Notify?

A Mercury-added Product Notification Form for all mercury-added lamps must be filed with IMERC or with each state requiring Notification before these mercury-added products are offered for sale or distribution in these states. For the purpose of this requirement, a mercury-added lamp is any lamp to which mercury is intentionally introduced for any reason.

A company or other organization must submit a Mercury-Added Product Notification Form under the following scenarios:

- **Manufacturer:** You manufacture a mercury-added lamp (e.g., fluorescent lamp) for consumer, commercial, industrial, or government use in states requiring Notification to which you intentionally add mercury for any reason.
- **Importer:** In states requiring Notification, you import a mercury-added lamp for consumer, commercial, industrial, or government use to which mercury is intentionally added for any reason, and the manufacturer has not submitted a Notification Form.
- **Distributor/Retailer:** A manufacturer or importer has failed to submit the required Notification Form, and you wish to sell or distribute their mercury-added lamp for consumer, commercial, industrial, or government use in states requiring Notification. In this situation, you may choose to file the Notification Form for the mercury-added product you wish to sell or distribute.
- **Manufacturer/Distributor:** You obtain a mercury-added lamp product from any source, change it in any way (e.g., change the label on the product, incorporate it into another product), and sell or distribute the altered mercury-added lamp in states requiring Notification. Manufacturers, wholesalers, or distributors who only repackage a mercury-added product produced in the United States or imported by another organization into the United States are not required to notify. However, in order to sell these products, you may choose to submit a Notification Form for the products you distribute if the manufacturer or importer fails to do so.
- **Other Organization:** You are an organization reporting on behalf of a company that falls under any of the above descriptions or otherwise manufactures, distributes, or imports a mercury-added lamp for sale or distribution in states requiring Notification.

For the purposes of this requirement, a manufacturer (or importer/wholesaler/distributor) is any person, firm, association, partnership, corporation, governmental entity, organization, combination, or joint venture that produces (or imports/sells/distributes) a mercury-added product. If a manufacturer, wholesaler, distributor, or importer changes a mercury-added product in any way (e.g., changes the label on the product, incorporates the product into another product) and sells or distributes the altered product in states requiring Notification, they are considered a manufacturer of a mercury-added product under this requirement and must submit a Notification Form.

Please contact IMERC at 617-367-8558 to discuss your situation if you are unsure whether you need to submit a Notification Form.

Reporting Deadlines

The IMERC states require companies that must comply with the Mercury-added Product Notification requirements to provide a complete update of their Notification Form, including

product information and total mercury use for US sales of mercury-added products, at least once every three years. The first reporting year was 2001, and the deadline for submitting Notification Forms for that year was April 1, 2002. The next full reporting year was 2004, and the deadline for reporting for that year was April 1, 2005. The following is the schedule for Triennial Notification, starting in calendar year 2007:

- Triennial Reporting Deadline for Calendar Year 2007 Sales of Mercury-added Products in the US: **April 1, 2008**
- Triennial Reporting Deadline for Calendar Year 2010 Sales of Mercury-added Products in the US: **April 1, 2011**
- Triennial Reporting Deadline for Calendar Year 2013 Sales of Mercury-added Products in the US: **April 1, 2014**

In between the triennial updates, mercury-added product manufacturers and their representatives are required to submit an updated Mercury-added Product Notification Form if:

- (1) there is a change in any of the product information required for Notification (e.g., increase or decrease in the amount of mercury);
- (2) mercury is eliminated from the product;
- (3) the manufacturer stops manufacturing the mercury-added product;
- (4) the mercury-added product is no longer sold in the states requiring Notification; and/or
- (5) the manufacturer begins to produce additional mercury-added products.

New Lamp-Specific Form

In 2005, IMERC member states created this Mercury-added Product Notification Form for Lamp Manufacturers Only and posted it on the IMERC webpage for use after February 20, 2006, for the following reasons:

- To standardize reporting among lamp manufacturers so that the states can track trends in mercury use in lamps.
- To enable the states to match the information reported by lamp manufacturers with the information reported by manufacturers that purchase lamps and use them in other products (such as bug catchers, electronics, automobiles, and medical devices).
- To develop consistent nomenclature for identifying mercury-added lamps to lessen confusion for those interested in using the Mercury-added Product Notification information.

If you have provided Notification prior to February 20, 2006, you do not need to submit this revised Form for previous filings.

Reporting by Product Category

Two or more mercury-added lamp models may be reported as a single mercury-added lamp product category if:

- (1) All lamps included in the product category are similar products (i.e., same type of lamps);
- (2) All lamps included in the product category serve the same consumer or commercial purpose; and
- (3) All lamps included in the product category contain an amount of mercury that falls within the same designated range, as follows:
 - (a) Greater than 0 but less than or equal to 5 milligrams (mg);
 - (b) Greater than 5 mg but less than or equal to 10 mg;
 - (c) Greater than 10 mg but less than or equal to 50 mg;
 - (d) Greater than 50 mg but less than or equal to 100 mg;
 - (e) Greater than 100 mg but less than or equal to 1000 mg; or
 - (f) Greater than 1000 mg.

The IMERC member states discourage reporting by model numbers for mercury-added lamps unless there is no other way to meet the criteria outlined above, and prefer that lamps be grouped into product categories.

To encourage consistency in reporting, IMERC has developed lists of specific lamp types and applications that should be used for Notification. To develop these lists, IMERC consulted prior Mercury-added Product Notification Forms from lamp manufacturers; various lamp experts; and the National Electrical Manufacturers Association (NEMA) Lamp Section, which includes representatives of major US lamp manufacturers.

IMERC has identified the following mercury-added lamp types:

- Fluorescent (FL)
- Compact fluorescent (CFL)
- Cold cathode fluorescent (CCFL)
- Mercury vapor (MV)
- Metal halide (MH)
- Ceramic metal halide (CMH)
- High pressure sodium (HPS)
- Mercury short-arc (MSA)
- Mercury xenon short-arc (MX)
- Mercury capillary (MC)
- Neon (NE)

IMERC has identified the following potential applications for lamps:

- General Lighting (GL)
- Audio/Visual (AV)
- High Output/General (HO)
- State/Studio/TV (SSTV)
- Miniature/Automotive (MA)

- Industrial/UV Curing/Graphic Arts (IN)
- Scientific/Medical (SM)
- Germicidal/Sun Tanning (GS)
- Street/Roadway (SR)
- Reprographic/Photographic (RP)
- Other – Specify (O)

In summary: The criteria for categorizing mercury-added lamp products are that lamps in the same category must be the same types of lamps, be used for similar applications (generally no more than two applications per product category), and have mercury contents that fall within the same designated range.

SPECIFIC INSTRUCTIONS FOR COMPLETING THE FORM

SECTION I. TYPE OF NOTIFICATION

First Notification – Place an **X** here if this is the first Notification Form submitted for your company or organization.

Triennial Renewal Notification – Place an **X** here if this is a triennial renewal Notification. **A complete renewal Mercury-added Product Notification Form must be submitted every three years** (see reporting deadlines outlined above).

Updated Notification – Place an **X** here if this is an updated Notification for a particular mercury-added product or product category. Indicate the reason for the update. An updated Notification Form is required if (1) there is a change in any of the product information required for Notification (e.g., increase or decrease in the amount of mercury); (2) mercury is eliminated from the product; (3) the manufacturer stops manufacturing the mercury-added product; or (4) the mercury-added product is no longer sold in states requiring Notification; or (5) the manufacturer begins to produce additional mercury-added products. A Notification Form is also considered an update if you are providing revised or additional information for the initial Notification as requested by IMERC.

SECTION II. REPORTING COMPANY INFORMATION

Complete this Section only if you are a distributor/wholesaler or importer submitting the Notification Form on behalf of a mercury-added lamp manufacturer or because the manufacturer has failed to submit Notification. If you are a manufacturer, skip this section.

Company/Organization Name – The full legal name of the company or organization filing the Notification Form.

Company/Organization's Mailing Address – The mailing address for the company or organization filing the Notification Form including a street number and street name or P.O. Box number, city or town, state, and zip code.

Company/Organization's Telephone Number – General telephone number of the company or organization filing the Notification Form.

Company/Organization's Web Address – If the company or organization filing the Notification Form has a Web site, provide their web address.

Contact Person – A contact person for the company or organization filing the Notification Form who can answer questions regarding the information submitted.

Contact Person's Title – Title of the contact person for the company or organization filing the Notification Form.

Contact Person's Address – Mailing address for the contact person, including a street number and street name or P.O. Box number, city or town, state, and zip code.

Contact Person's Telephone Number – Telephone number of the contact person for the company or organization filing the Notification Form.

Contact Person's E-mail Address – If the company or organization filing the Notification Form corresponds via E-mail, provide an E-mail address for the contact person.

SECTION III. MANUFACTURER INFORMATION

This section requires information on the manufacturer of the mercury-added lamp products and their designated contact person to respond to any questions regarding the information submitted. If you are a distributor/wholesaler, importer, or other organization, you must provide the information required in this section for the individual manufacturer for whom you are submitting the information, including their contact person.

Manufacturer's Name – The full legal name of the manufacturer.

Manufacturer's Mailing Address – The mailing address of the manufacturer, including a street number and street name or P.O. Box number, city or town, state, and zip code.

Manufacturer's Telephone Number – General telephone number for the manufacturer.

Manufacturer's Web Address – If the manufacturer has a Web site, provide their web address.

Manufacturer's NAICS Code(s) – The North American Industry Classification System (NAICS) code is a two to six digit number representing a manufacturing or industry sector into which the firm's activities fall. The NAICS system has replaced the Standardized Industrial Classification (SIC) system. If the manufacturer has not

identified the appropriate NAICS code for their manufacturing activity, list the SIC code(s) and indicate that they are SIC and not NAICS codes.

Contact Person – A contact person for the manufacturer who can answer questions regarding the information submitted.

Contact Person's Title – Title of the contact person for the manufacturer.

Contact Person's Address – Mailing address for the contact person including a street number and street name or P.O. Box number, city or town, state, and zip code.

Contact Person's Telephone Number – Telephone number of the contact person.

Contact Person's E-mail Address – If the manufacturer corresponds via E-mail, provide an E-mail address for the contact person.

SECTION IV. PRODUCT INFORMATION TABLE

Each mercury-added lamp product or product category must be listed separately in Section IV, the Product Information Table. Additional copies of the Table can be made and attached to the Notification Form as needed.

Name of Company Submitting Information – Provide the name of the reporting company or organization.

(1) Lamp or Lamp Product Category that *YOU* manufacturer, distribute, or import – Identify and describe the lamp product or product category that the company filing the Notification Form manufactures, distributes, or imports. Review the general instructions above to determine if you can group multiple lamp products into a single product category. Column 1 in Section IV provides a key to lamp types, including the following:

- Fluorescent (FL)
- Compact fluorescent (CFL)
- Cold cathode fluorescent (CCFL)
- Mercury vapor (MV)
- Metal halide (MH)
- Ceramic metal halide (CMH)
- High pressure sodium (HPS)
- Mercury short-arc (MSA)
- Mercury xenon short-arc (MX)
- Mercury capillary (MC)
- Neon (NE)

You must use one of these lamp types and only one lamp type per product category. Also identify the type of lighting produced (e.g., general, high-output, ultraviolet) and/or indicate physical characteristics of the lamps (e.g., length, short-arc, compact).

- (2) **Mercury Content** – Report the amount of mercury added to the product, including the unit of measure, which should be milligrams (mg). The amount of mercury added to a lamp product can be reported in either of two ways:
- (a) Report the exact amount of mercury; or
 - (b) Indicate the appropriate range for the amount of mercury from the following options: >0-5 mg, >5-10 mg, >10-50 mg, >50-100 mg, >100-1000 mg, or >1000 mg.
- (3) **How Amount of Mercury is Reported** – Indicate whether the information reported under (2) is an exact amount of mercury (E), or a range (R).
- (4) **Application of Lamp** – The Mercury-added Product Notification Form provides a list of applications of mercury-added lamps. Select from the list, using the designated application abbreviations or indicate other applications:
- General Lighting (GL)
 - Audio/Visual (AV)
 - High Output/General (HO)
 - State/Studio/TV (SSTV)
 - Miniature/Automotive (MA)
 - Industrial/UV/Curing/Graphic Arts (IN)
 - Scientific/Medical (SM)
 - Germicidal/Sun Tanning (GS)
 - Street/Roadway (SR)
 - Reprographic/Photographic (RP)
 - Other – Specify (O)
- (5) **Wattage** – Provide the range in wattage of the mercury-added lamps in the product category.
- (6) **Total Amount of Mercury** – Please enter the total amount of mercury in all units sold in the United States in the most recent calendar reporting year for each product or category of products. The total amount of mercury should be a point estimate; ranges are not acceptable. Data for calendar year 2001 was due on April 1, 2002; data for calendar year 2004 was due on April 1, 2005; **data for calendar year 2007 is due April 1, 2008; data for calendar year 2010 is due April 1, 2011; data for calendar year 2013 is due April 1, 2014.**

SECTION V. CERTIFICATION

A senior management official is required to sign and date the Notification Form to certify that the information provided on the Form is true and correct to the best of the individual's knowledge and belief, subject to penalty for making un-sworn false statements. A senior management official is defined as a corporate officer or the individual responsible for the overall operation of a facility or operational unit of a facility, such as a plant manager, superintendent, manager of environmental programs, or person of equivalent responsibility.

Signature – Signature and date by an authorized senior management official.

Printed Name and Title – Legibly print the name and official title of the senior management official signing the Notification.

SAMPLE FORM – Numbers & company name presented below are not real.

IV. Product Information Table

Name of Reporting Company: Mercury Lamps, Inc.

(1) Lamp or Lamp Product Category Description – must include <u>lamp type</u> (see key below) and other appropriate descriptors, such as type of light produced (e.g., general, high-output, ultraviolet) and/or physical characteristics (e.g., length, short-arc, compact)	(2) Mercury Content in milligrams – (see instructions below)	(3) How Amount of Mercury is Reported (R for range or E for exact)	(4) Application of Lamp (see key below)	(5) Wattage (provide range)	(6) Total Amount of Mercury in grams in all units sold in the U.S. for each product or product category in calendar year _____
CFL	>0-5 mg	R	GL	10-80 watts	230 grams
FL – 4-6 Foot Tubes	>5-10 mg	R	GL	40-60 watts	543 grams
MV	>50-100 mg	R	GL, HO	100 – 1,000 watts	1,022 grams
HPS	>50–100 mg	R	HO, I, SR	> 100 watts	2,423 grams
MX – ultraviolet	>100–1000 mg	R	IN	250 – 1,000 watts	293 grams
NE	125 mg	E	O – product signs	200 watts	2,437 grams

(1) Lamp Description – Use one of these lamp types and only one lamp type per product category:

- FL** – Fluorescent
- CFL** – Compact fluorescent
- CCFL** – Cold cathode fluorescent
- MV** – Mercury vapor
- MS** – Mercury short-arc
- MH** – Metal halide
- HPS** – High pressure sodium
- CMH** – Ceramic metal halide
- MX** – Mercury-xenon short-arc
- MC** – Mercury capillary
- NE** – Neon

(2) Mercury Content – Use an exact amount or one of the ranges below:

- >0 – <5 mg
- >5 – 10 mg
- >10 – 50 mg
- >50 – 100 mg
- >100 – 1000 mg
- > 1000 mg

(4) Application – select from list:

- GL** – General Lighting
- AV** – Audio/Visual
- HO** – High Output General
- SSTV** – Stage/Studio/TV
- MA** – Miniature/Automotive
- SR** – Street/Roadway
- IN** – Industrial/UV Curing/Graphic Arts
- SM** – Scientific/Medical
- GS** – Germicidal/Suntanning
- R** – Reprographic/ Photographic
- O** – Other – Specify

(6) Total Amount of Mercury – Total mercury in all units sold units should be reported for calendar years 2001, 2004, 2007, 2010, etc. See instructions for more information on this requirement.

Confidential Business Information – If your company has concerns about confidential business information (CBI), you should not submit this Notification to the Interstate Mercury Education and Reduction Clearinghouse (IMERC). For CBI consideration, submit the IMERC Notification Form and a written request for CBI treatment directly to each of the following state agency contacts:

Connecticut Department of Environmental Protection
Office of Planning and Program Development
79 Elm Street
Hartford, CT 06106
Contact: Thomas Metzner, CT DEP (860) 424-3242, tom.metzner@ct.gov

Louisiana Department of Environmental Quality
602 N. Fifth Street
PO Box 4312
Baton Rouge, LA 70802
Contact: Chris Piehler, LA DEQ (225) 219-3609, chris.piehler@la.gov

Maine Department of Environmental Protection
Bureau of Remediation and Waste Management
17 State House Station
Augusta, ME 04333-0017
Contact: Enid Mitnik, ME DEP (207) 287-8556, enid.mitnik@maine.gov

Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108
Contact: Lori Segall, MA DEP (617) 654-6595, lori.segall@state.ma.us

New Hampshire Department of Environmental Services
Pollution Prevention Program
6 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095
Contacts: Stephanie D'Agostino, NH DES (603) 271-6398, Stephanie.D'Agostino@des.nh.gov

New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-7250
Contacts: Peter Pettit, NYS DEC (518) 402-8705, pmpettit@gw.dec.state.ny.us
Christine Barnes, NYS DEC (518) 402-8705, cabarnes@gw.dec.state.ny.us

Rhode Island Department of Environmental Management
235 Promenade Street
Providence, RI 02908
Contacts: Ron Gagnon, RI DEM (401) 222-4700 (x7500), ron.gagnon@dem.ri.gov; or
Beverly Migliore, RI DEM (401) 222-4700 (x7503), beverly.migliore@dem.ri.gov

Vermont Department of Environmental Conservation
103 South Main Street
Waterbury, VT 05671
Contact: Karen Knaebel, VT DEC (802) 241-3455, Karen.Knaebel@state.vt.us