

August 22, 2007

RLF
ICF Consulting
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ICF/EPA,

I have just completed my review of the final draft for Energy Star Qualified Residential Lighting Fixture Program Requirements 4.1 - Mercury Content RLF Specifications, the proposed changes covering maximum allowed mercury content and the accompanying labeling. I have two comments on these revisions; both concern the new marking/labeling requirements.

First, you are asking that the fluorescent lamp carry a label with the following information:

- The symbol "Hg" within a circle
- "Lamp Contains Mercury"
- "Please Recycle Where Facilities Exist"
- www.epa.gov/bulbrecycling

Where do you propose a label of this size be placed? These statements are larger than the non-glass portion of most G-24 lamps. I urge you to find a more concise statement. Failure to do that will result in the customer removing the label completely. Once removed, the intent of your requirement will disappear. When the lamp fails, the consumer will have long forgotten what to do.

You are asking for similar markings on the outside of the selling carton. Again, this may not be the best place. You may want to consider keeping the marking on the carton short and concise, i.e. *"Contains Mercury – Dispose of in accordance with local, state and federal laws"*. In many instances, the carton will have a very short life expectancy in the consumer's home. The four points of information might better be placed on the inner packaging, lamp carton (if that exists) and/or the instruction sheet. The instruction sheet especially will survive the installer's clean up. They are typically left behind after the work is completed.

If these areas could be adjusted, I believe you would have a very solid and usable statement.

Thank you for the opportunity to comment. Please feel free to pass my comments on to anyone interested. I am of course available for clarification.

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