

Environmental Health & Safety

Title: Universal Waste – Fluorescent Bulb Disposal Policy and Procedure	
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I. Purpose of the Policy:

To streamline environmental regulations for wastes generated by large numbers of businesses in relatively small quantities, the Environmental Protection Agency (EPA) issued the Universal Waste Rule in 1995. It was designed to encourage recycling of certain wastes such as batteries, mercury containing devices and pesticides. Spent fluorescent bulbs were added as a universal waste effective January, 2000.

In New York State, the Department of Environmental Conservation has been designated by EPA as the lead agency for hazardous waste regulatory enforcement under the Resource Conservation and Recovery Act (RCRA). New York adopted the universal waste regulations, including a statewide deferral to federal universal waste regulations for spent lamps effective January 6, 2000.

In order for a waste to be handled as universal waste, specific requirements for storage, labeling and disposal must be followed. Materials **MUST** be recycled. If materials are not recycled, all of the stricter hazardous waste regulations must be followed.

The purpose of this policy is to provide all of the necessary information to properly manage universal waste lamps. This policy outlines the procedures for disposing of fluorescent light bulbs (lamps) as universal waste. The procedures herein are a result of state and federal regulations governing the proper disposal of waste lamps.

II. Scope:

This policy is to be applied to Buffalo State College's campus, and addresses the handling of universal waste lamps generated as a result of routine maintenance, renovation, or other activities that require their collection and/or disposal.

III. Applicable Codes/Responsibility:

- o Codified on May 11th, 1995 in the Code of Federal Regulations 40 CFR 273, amended on July 6th 1999 to include fluorescent bulbs (64 FR 36465-36490).
- o Fully promulgated by New York State Department of Environmental Conservation on January 6th, 2000 in NYCRR Subpart 374-373.

Responsibility for compliance with this policy rests with College Facilities (Maintenance), Custodial Staff, and the Contractors. All Buffalo State College personnel and contractors who handle universal waste lamps are responsible to understand and follow the procedures outlined herein.

IV. Policy and Procedure:

- o Intact waste lamps generated as a result of routine maintenance, renovation, or other similar activities, shall be collected in a sealable container (ideally, the original

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packaging from new lamps can serve this purpose). Alternatively, new boxes are available from Business Services or EH&S. The container must be kept **CLOSED AT ALL TIMES**, unless lamps are actively being added.

- The container must be labeled with the appropriate BSC label. Place the BSC label on box and fill out the appropriate information on the label when the first waste lamp is placed in box. The BSC label includes the following information:
 - Wording: “UNIVERSAL WASTE LAMPS”, “PLEASE KEEP BOX CLOSED AT ALL TIMES”.
 - Accumulation start date of when the first universal waste lamp is placed in the container.
 - The building where the lamps came from.
 - (#) number of lamps in the box, this is filled in upon the completion of filling the box.
 - Date in which the box is sealed for disposal.

The BSC adhesive labels containing the above information are available through the Business Services, Custodial, and EH&S departments.

- When the container has been filled, or the specific project is complete, the lamp container or box should be brought to Business Services for proper disposal.
- In the event that a lamp is accidentally broken inside the packaging, the storage container should be immediately sealed (whether full or not), the label information should be filled out completely and then the box delivered to Business Services at the close of the work day.
- Occasional lamps that are broken **prior to packaging** are to be collected separately in either a plastic pail or bagged inside a sturdy cardboard box and immediately sealed. The lamps must be swept up with care so as to minimize exposure to powder and shards (proper PPE includes work gloves and safety glasses). The box or pail should be taken to Business Services for proper disposal and EH&S should be contacted for further instructions.
- Under **NO** circumstances can universal waste lamps be disposed of in dumpsters or regular trash.

V. Definitions:

Hazardous Waste Lamp: Examples of common lamps to be managed as universal waste include, but are not limited to: fluorescent, high intensity discharge (HID), neon, mercury vapor, high-pressure sodium, and metal halide. Incandescent bulbs are not hazardous and do not need to be managed as Universal Waste.

Lamp: The bulb or tube portion of an electric lighting device.

Universal Waste: Federal regulations promulgated for the purpose of streamlining hazardous waste management standards assigned the status of “Universal Waste” to batteries, pesticides, mercury-containing thermostats, and fluorescent lamps.