

Fluorescent Lamp Handling



Collection and Management

Management and disposal of fluorescent light bulbs and other mercury-containing lamps by businesses are regulated under



the Resource Conservation and Recovery Act (RCRA). The Universal Waste Rule provides flexibility in the management of lamps, streamlined requirements for waste handlers and promotes recycling. Easing the regulatory burden associated with the management of this waste reduces administrative, shipping and disposal costs, making it easier to recycle this material.

Tips for managing used bulbs

- ◇ **Storage:** containers must prevent breakage and be structurally sound and compatible with the contents of the lamps. Such containers and packages must remain closed and lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. 40 CFR 273.13(d)(1).
- ◇ **Labeling:** label or mark clearly with one of the following phrases: “Universal Waste –Lamp(s)” or “Waste Lamp(s)” or “Used Lamp(s).” 40 CFR 273.14(e).
- ◇ **Training:** 40 CFR 273.16 states that a small-quantity handler of universal waste must inform all employees who handle or manage universal waste about proper handling and emergency procedures appropriate to the universal waste handled at the facility.
- ◇ **Time:** Small-quantity handlers of universal waste must be able to demonstrate the length of time that the universal waste has accumulated, starting from the date it becomes a waste or is received. Storage time limit is one year. 40 CFR 273.15.
- ◇ **Transportation:** If you generate a small amount of waste lamps or have the capacity to transport the waste lamps or are located in close proximity to the recycler, you may choose to self-transport the waste lamps to the recycler. Self-transporting waste lamps must still comply with Department of Transportation requirements under the Universal Waste rule 40 CFR 273.50.

Standards for Universal Waste Management - 40 CFR 273

	Small-quality handler	Large-quantity handler
Quantity handled by category	Accumulate <5,000 kg (11,000 lb) on-site at any one time; §273.9	Accumulate 5,000 kg (11,000 lb) or more on-site at any one time; §273.9
EPA identification number	Not required; §273.12	Required; §273.32
On-site accumulation limit	Less than 5,000 kg; §273.9	No quantity limit
Storage time limit (without a storage permit)	One year, unless for proper recovery, treatment or disposal; §273.15	One year, unless for proper recovery, treatment or disposal; §273.35
Manifest	Not required; §273.19	Not required, but must keep basic shipping records; §273.39
Personnel training	Basic training; §273.16	Basic training geared toward employee responsibilities; §273.36

How to establish a recycling program for mercury-containing light bulbs:

www.epa.gov/osw/hazard/wastetypes/universal/lamps/recycle.htm