Universal Waste Lamps: Information for Small Businesses

All fluorescent lamps (including CFLs) and high intensity discharge lamps (the term commonly used for several types of lamps, including metal halide, high pressure sodium, and mercury vapor lamps) contain a small amount of mercury and, by law, must be recycled or disposed of as hazardous waste. They cannot go in the trash or dumpster. Mercury is a heavy metal and when released into the environment can contaminate the air, soil, surface water and groundwater. Mercury can also accumulate in humans and animals and cause adverse health effects. Fluorescent lamps may be managed as “universal waste,” which makes their management and recycling less expensive and easier. In all cases, the business generating fluorescent lamps must track the management and movement of fluorescent lamps. This does not require the use of manifest tracking via a registered hazardous waste transporter, but may instead be accomplished with a tracking mechanism such as a bill of lading.

There are a few important things to remember when managing these waste lamps:

**STORAGE**

Store lamps in containers that are compatible with the lamps, in good condition, and closed at all times except when lamps are being added to or removed from the container. Indoor storage is recommended; however, if containers are stored outside, they must be covered to prevent precipitation from coming into contact with the containers. Waste lamps may not be stored at the facility for more than one year, unless the business has written documentation to prove it is necessary to facilitate proper recovery, treatment or disposal.

**LABELING**

Clearly label or mark each container of waste lamps with any one of the following phrases: “Universal Waste – Waste Lamps,” “Waste lamps” or “Used Lamps.” Write the date on the container when the first waste lamp is placed into the empty container.

**RECYCLING OPTIONS**

Professional fluorescent lamp recyclers – Facilities can call for a “milk run” pick up by one of the approved lamp recycling facilities. This is convenient, but may involve either a minimum transportation charge or minimum number of lamps. A list of recyclers is at:
Self-Transport to Recycling Facilities – As universal waste, lamps may be self-transported to an approved lamp recycling facility. This saves on minimum charges or transportation fees. Lamps must be transported in such a manner as to prevent breakage and in proper containers that prevent any loss of mercury to the environment in the case of breakage.

Lamp Recycling Kits – These kits consist of a properly constructed box that, once filled with waste lamps, is mailed to an approved recycling facility via common carrier. The purchase cost of the kit includes the shipping charge and recycling fee. Most fluorescent lamp recyclers provide mailing kits.

Municipal Recycling Programs – Many towns accept lamps on a year-round basis and some household hazardous waste collection events accept lamps, although these programs usually focus on homeowner-generated lamps. Some municipalities will accept small quantities of business-generated lamps for recycling and small businesses may self-transport lamps to a household hazardous waste collection event or transfer station. Be sure to call ahead to confirm that lamps from businesses will be accepted. A list of household hazardous waste collection events can be found at: http://des.nh.gov/organization/commissioner/p2au/pps/hhwp/index.htm. Please keep in mind that while universal waste can be self-transported to household hazardous waste collection events without the use of a hazardous waste manifest, businesses MUST obtain a uniform hazardous waste manifest in advance if they are self-transporting any other type of hazardous waste to these collection events. Please contact NHDES at 1-866-HAZWAST or 1-866-429-9278 for additional guidance on self-transporting hazardous waste.

CLEAN UP PROCEDURES FOR BROKEN LAMPS

For breakage on a hard surface -
1. Ventilate the room by closing all interior doors and vents, opening windows and any exterior doors in the room and leave the room (restrict access) for at least 15 minutes.
2. Remove all broken lamp pieces you can and DO NOT VACUUM.
   a. Wear disposable gloves, if available.
   b. Carefully clean up the glass fragments and residue with a stiff paper or cardboard.
   c. Pick up any remaining small pieces of glass and residue using tweezers and sticky tape, such as masking or duct tape.
   d. Wipe the area clean with a damp paper towel, cloth or disposable wet wipe.
3. Place all remnants and cleanup materials (cardboard, gloves, tape, etc.) in a tightly sealed container.
4. Label the container “broken universal lamps for recycle” or “hazardous waste.”
5. Store the container in a secure area until you are able to recycle it as universal waste or dispose of it as hazardous waste (in the event that it can no longer be accepted or recycled as universal waste).
6. Wash your hands.
7. Leave windows in the affected room open as long as practical (weather permitting).
For breakage on carpet -
Complete steps 1 through 7 above then:
8. If the rug is removable, take it outside, shake, and air out as long as practical.
9. After the cleanup, the first time you vacuum the area where the lamp was broken, shut the door to the room or close off the area as much as possible and ventilate the room when vacuuming. Remove the vacuum bag when done cleaning the area, wipe vacuum with wet wipe and put the bag and/or vacuum debris, including cleaning materials, into a plastic bag, double bag it then put it in a secure area to be managed as described in steps 3-5 above.
10. After vacuuming, keep window open and door closed for one to two hours.

For Further Information
Please call NHDES Pollution Prevention Program at (603) 271-6398 or the Hazardous Waste Assistance Hotline: 1-866-HAZWAST or 1-866-429-9278. Email nhppp@des.nh.gov or hwcomp@des.nh.gov.