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Environmental Health and Safety (EHS) Policy

Used Fluorescent Lamps

Regulatory Reference: 40 CFR 273, Standards for Universal Waste Management, State specific recycling rules.

Purpose: The purpose of this Used Fluorescent Lamp Program is to establish a framework for each Fixed Base Operation (FBO) to become and remain compliant with the Federal Environmental Protection Agency (EPA) rules as well as state specific rules for Used Fluorescent Lamps and Universal Waste.

The EPA Universal Waste regulations came about in the early 1990s to allow generators of certain common waste items to properly recycle these items and streamline the requirements for these items. Items regulated in the Universal Waste rules include the following.

- Used Batteries.
- Used Florescent Lamps.
- Pesticides.
- Mercury containing equipment.

General Requirements:

The Federal EPA has set forth rules for proper handling and recycling of used fluorescent lamps under the Universal Waste Rules and the requirements for handling these items are simpler than the rules governing hazardous waste. A significant part of these rules includes the proper recycling of the used fluorescent lamps. Fluorescent lamps contain mercury and are therefore hazardous to the environment. Recycling fluorescent lamps keeps them out of the landfills and thus protects the environment from potentially hazardous waste. The regulations include recordkeeping requirements for Large Quantity Handlers (greater than 5,000 KG stored at any one time), but all FBO operations should fall below this limit and thus should not be required to maintain specific records.

Proper handling of used fluorescent lamps includes proper labeling. Each Fluorescent Lamp or each storage location must be labeled as “Used Fluorescent Lamps” and the storage area needs to be labeled with the date accumulation began (date of last shipment) as fluorescent lamps can be stored no more than one year.

When florescent lamps are replaced, the used lamps must be placed in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps. It is recommended to use one of the boxes that the new lamps were delivered in, but be sure to label the used lamps with a “Used Fluorescent Lamps” label.

Broken lamps must be placed in a closed, structurally sound container that is compatible with the contents of the lamp and must keep any releases of mercury inside the package. Broken lamps should be placed in a closed plastic container and the lid should be taped closed. These containers should be labeled as “Broken Fluorescent Lamps.”

Many FBOs already have a recycling company in place, however, if a recycler is needed, companies can be located with the assistance of the Association of Lighting & Mercury Recyclers on their web site at www.almr.org.

Employees must not transport used fluorescent lamps to recycling center. Use only an approved transporter (usually the company that recycles the fluorescent lamps).

Responsibilities:

1. Employees:

Employees must be aware of the requirements for the handling of used fluorescent lamps, properly recycling used fluorescent lamps, and proper response to broken lamps.

Employees must properly store and label used fluorescent lamps and must mark the storage area with the date that fluorescent lamps were accumulated (date of last shipment to the recycler).

Fluorescent lamps may be accumulated for a period of no more than one year before they are sent to a recycler.

Employees must know the proper method to respond to a broken fluorescent lamp and how to properly package it for shipment.

Employees must participate in a training session to discuss proper handling and proper response to broken lamps. Training only needs to be completed initially and no refresher training is required.

2. Managers/Supervisors:

Managers/Supervisors should ensure that employees are performing their work activities in a proper manner including handling, recycling, and response to broken lamps.

Managers/Supervisors should ensure that employees respond appropriately to broken lamps. Managers/Supervisors should make notifications to Federal, State, and Local environmental regulatory agencies if required.

Managers/Supervisors should ensure fluorescent lamps are stored for less than one year before they are shipped to a recycler.

Managers/Supervisors should ensure that used fluorescent lamps are properly labeled.

Managers/Supervisors should ensure employees participate in the required training.

3. EHS/Safety:

The Environmental Health and Safety (EHS)/Safety Department will monitor compliance with all environmental regulations including Universal Waste and used fluorescent lamps.

The EHS/Safety Department will assist FBOs in setting up initial “train the trainer” sessions and can assist in any environmental questions that may arise.

The EHS/Safety Department must be notified of any reportable spill event and will properly document in the company tracking system.

Training:

Employees must be trained to include proper handling and emergency procedures. This training is only required initially and no refresher training is required. EHS/Safety is planning to develop training materials and make them available to each FBO.

Recordkeeping:

No shipping records or manifests are required.

Documentation of the training activities must be maintained and must include the person’s name, date of training, and topics covered.