
FLUORESCENT BULB DISPOSAL AS UNIVERSAL WASTE POLICY

Category: Events and Facilities

Responsible Office: Environmental Health & Safety Office

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POLICY SUMMARY

This policy requires that fluorescent light bulbs (lamps) be treated as universal waste and be disposed of according to state and federal regulations governing the proper disposal of universal waste.

POLICY

Policy Statement

Universal waste lamps generated as a result of routine maintenance, renovation, or other activities must be disposed of in accordance with the Universal Waste Rule.

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 packaging from new lamps can serve this purpose). Alternatively, new boxes are available from the offices of Business Services or Environmental Health & Safety. The container must be kept **closed at all times**, unless lamps are actively being added.

Background

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.

Applicability

All SUNY Buffalo State personnel and contractors who handle universal waste lamps are responsible to understand and follow the procedures outlined herein.

Definitions

Hazardous waste lamp- Common lamps that must be managed as universal waste, including but 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 - Status assigned by Federal regulations promulgated for the purpose of streamlining hazardous waste management standards. Universal waste includes batteries, pesticides, mercury-containing thermostats and fluorescent lamps.

Responsibility

Responsibility for compliance with this policy rests with the SUNY Buffalo State Campus Services Office (maintenance and custodial staff) and SUNY Buffalo State contractors.

Procedure

1. The universal waste container must be labeled with a specific SUNY Buffalo State label. The labels are available from the offices of Business Services, Custodial Services or Environmental Health & Safety.
2. Place the label on the box and fill out the appropriate information on the label when the first waste lamp is placed in the box. The label requires the following information:
 - Wording: "UNIVERSAL WASTE LAMPS. PLEASE KEEP BOX CLOSED AT ALL TIMES."
 - Accumulation start date showing when the first universal waste lamp is placed in the container.
 - The name of the building where the lamps were used.
 - The number of lamps in the box. (This information is added once the box is full.)
 - Date on which the box is sealed for disposal.
3. When the container has been filled, or when the activity that requires collection and disposal of the lamps is complete, the lamp container or box should be brought to the Business Services Office for proper disposal.
4. 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 the box delivered to the Business Services Office at the close of the work day.
5. Lamps broken **prior to packaging** are to be collected separately either in 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 personal protective equipment (PPE) includes work gloves and safety glasses. The box or pail should be taken to the Business Services Office for proper disposal and the Environmental Health & Safety Office should be contacted for further instructions.
6. Under **no** circumstances may universal waste lamps be disposed of in dumpsters or with regular trash.

RELATED INFORMATION

Related links:

Codified on May 11, 1995 in the Code of Federal Regulations 40 CFR 273, amended on July 6, 1999, to include fluorescent bulbs ([64 FR 36465-36490](#))

Fully promulgated by New York State Department of Environmental Conservation on January 6th, 2000, in [NYCRR Parts 373, 374](#)

Other information:

Environmental Health & Safety Office Internal Reference: #UW-06-001

CONTACT INFORMATION

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REVISION HISTORY

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Brief description of edit: Adapted to standard template

APPROVAL

Approved prior to 2016