



TRADEBE

FLUORESCENT LAMP GUIDELINES

TRADEBE works closely with customers to ensure that hazardous waste shipments and packaging are in compliance with container regulatory requirements of the Department of Transportation, (DOT).

This regulatory brochure was designed to aid Tradebe customers in the development of programs for the proper management, (e.g., generation, packaging and shipments), of universal waste/lamps.

Generators of universal waste, known as universal waste handlers, (“handlers”), are classified by the USEPA as small quantity handlers (40 CFR 273 Subpart B) or large quantity handlers, (40 CFR 273 Subpart C), based on the volume of all universal waste¹ generated by the handler at their site.

Federal universal waste regulations apply to: batteries, pesticides, mercury containing devices and lamps.

Handlers must manage lamps in a way that prevents release of any universal waste, or component of a universal waste, to the environment. Also, handlers must accumulate lamps in a structurally sound container to protect the lamps and prevent release of any universal waste constituent such as mercury.

Handlers must identify and label these containers with the type of universal waste and the date the waste was placed into the container.

USEPA regulations allow lamps to be identified as any of the following types:

- “Universal Waste—Lamp(s),” or
- “Waste Lamp(s),” or
- “Used Lamp(s)”

Note, “Bad bulbs” or “Bad lamps” are not USEPA approved types; (refer to 40 CFR 273 regulations).

Other Requirements of Universal Waste Handlers:

- *Broken lamps must be immediately cleaned up and placed in a structurally sound container.²*
- *Lamps showing evidence of breakage, leakage or other damage must be placed in a container to avoid the possible release of mercury or other hazardous constituents to the environment.*
- *Universal wastelamps cannot be accumulated for more than 1 year.*
- *Employees whose actions generate or responsibilities include handling waste lamps must be trained.*
- *Universal wastelamps must be shipped to approved facilities.*
- *Records of universal wastelamps shipments must be maintained.*

¹ Always check your state regulations to determine items that are state classified as Universal Wastes.

² Check your state regulations to determine if broken lamps must be managed as a Hazardous Waste.

Refer to USEPA 40 CFR 273 for the Federal Universal Waste Regulations. Tradebe recommends that Generators/Handlers of waste always review their state environmental regulations and guidance documents to determine the types and specific handling for their state’s universal waste regulations.



A C C E P T A B L E

Boxes used by the Original Equipment Manufacturer (OEM) for shipping new fluorescent lamps can be used by the handler to ship the waste lamps off-site for processing, as illustrated here.



New containers, (boxes, pails, drums), can be used for the accumulation and shipment of fluorescent lamps, tubes, and bulbs. Cushioning materials should be used if the container is not full and/or to prevent breakage during transit.



This picture illustrates a closed fiber drum used for the accumulation and shipment of universal waste lamps which fit inside the container protected from potential breakage.



This container is filled with used lamps and is properly labeled as universal waste lamps. The label is marked with the date the lamps were generated, as required by the USEPA.



Metal drums can be used for shipment of intact bulbs and u-tubes lamps. They should be used for shipment of broken bulbs and/or lamps to prevent the release of hazardous constituents.



EPA regulations require Handlers to label containers used for the accumulation and shipment of waste lamps with specific wording. Please refer to 40 CFR 273.14 (small quantity) or 40 CFR 273.34 (large quantity).



U N A C C E P T A B L E

This picture has examples of non-compliant universal waste containers used for shipments. Issues include: open and torn boxes, boxes with lamps extending past the box ends, tape used to close the box with lamps protruding.



As with the other examples, this picture illustrates lamps extending past the partially filled containers. Also, these containers lack the required universal waste labels.



This picture shows a handler shipped 8' lamps using a fiber container without the lid. The container was partially filled with no cushioning packaging in the container- it is believed that broken lamps occurred in transit.



This handler shipped 4' and 8' lamps in a 55-gallon metal drum. The generator shrink-wrapped the lamps to prevent breakage. This shipment method is still classified as non-complaint by the USEPA.



Improper use or handling of containers for fluorescent lamps and bulbs can cause safety and environmental concerns. Be advised that some states require that broken lamps and bulbs be handled as a hazardous waste.



This label example illustrates 2 problems: a DOT Regulated Material label is used for waste lamps. This label improperly described the universal waste as DOT regulated and uses the wrong wording for the container contents.



TRADEBE[™]
Sustainability at Work

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