

BULB/LAMP GUIDANCE DOCUMENT FOR CONTRACTORS**A. Regulatory Status**

1. Fluorescent lamps and other mercury containing lamps (e.g. neon, high intensity discharge, metal halide, and high pressure sodium bulbs that contain mercury vapor) are considered to meet the definition of Universal Waste and MUST be disposed of by Environmental Health and Safety (EHS).
 - All mercury containing lamps are shipped off-site for recycling within 1 year of their accumulation start date.
 - All mercury containing lamps sent off-site shall have proper shipping paperwork.
 - Shipping paperwork is to be signed by a member of the Environmental Affairs Section (EAS) of Environmental Health and Safety (EHS) at Yale University (432-6545).

B. Container Management

1. Place the lamps into sturdy cardboard boxes or fiber drums for storage and shipment.
 - Fiber drums are provided by EAS.
 - Original bulb boxes may also be used.
2. Ensure that each box or fiber drum is labeled with the words "Universal Waste" and "Lamps."
 - Pre-printed labels can be obtained from EAS.
3. Ensure that each box or fiber drum is marked with an accumulation start date (i.e. the date the first lamp is placed in the container).
4. While filling a box with lamps, ensure that one end of the box is taped closed. When the box is full or when you finish collecting lamps in the box ensure that both ends of the box are taped closed. When you finish collecting lamps in a fiber drum or when the fiber drum is full, place the lid on the drum.
5. Store all boxes and fiber drums in a secure, dry area away from public access.
6. Fax to 432-6148 or email to waste.requests@yale.edu a "Construction Site Waste Container Delivery Request" form to EHS for delivery of containers.
7. Contact JoAnn Farrell at 432-9384 to arrange for removal of containers.

C. Other Important Notes

1. Daily inspections of the work areas should be done by the site manager/supervisor to assure no lamps have broken and that all boxes and fiber drums are properly labeled and marked.
2. If any mercury containing bulbs inadvertently break during normal handling, carefully sweep up the broken bulbs and place the material in a box or drum with intact bulbs. Ensure that the box or drum is labeled with the words "Universal Waste-Lamps" and marked with the date the first bulb was added.
3. For other than inadvertent breakage of mercury containing bulbs, carefully sweep up the broken bulbs and place the material in a plastic lined box. Ensure that the box is labeled with the words "Hazardous Waste" and "Mercury Containing Lamps" and marked with the accumulation start date.
4. Spill cleanup materials are to be provided by the contractor and should include:
 - Broom and dust pan
 - Plastic lined cardboard box
 - Roll of tape
5. In the event of a spill or accident involving fluorescent bulbs, the following should be notified immediately:
 - Yale Environmental Health and Safety emergency number (785-3555)
 - Brenda A. Armstrong, Environmental Affairs Manager

Yale Environmental Health and Safety Work number: 203-432-3219

Cell phone: 203-627-8241

- Company performing the lamp removal
6. If any regulatory agency should come on site (OSHA, CTDEP, EPA)
 - Ask the representative to wait until a member of EHS arrives.
 - Contact EHS immediately (785-3555) with the name of the representative and the agency.
 - DO NOT deny the representative access to the site, but request that the inspectors await the arrival of an EHS representative.
 7. All inquiries pertaining to the storage and/or disposal of mercury containing lamps should be directed to JoAnn Farrell at 432-9384.