Yale University
Environmental Health and Safety
Environmental Affairs Section

Bulb/Lamp Guidance Document for Contractors

A. Regulatory Status

1. Fluorescent lamps and other mercury containing lamps (e.g. LED, 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 (203-432-6545).

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 each box or fiber drum is labeled with the words "Universal Waste - Lamps" or “Used Lamps.”
    - Pre-printed labels can be obtained from EAS.

3. Ensure each box or fiber drum is marked with an accumulation start date (the date the first lamp is placed in the container).

4. While filling a box with lamps, ensure one end of the box is taped closed. When the box is full or when you finish collecting lamps in the box, ensure 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. Submit an online Construction Waste Supply/Removal Request Form to EHS for delivery and 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 lamps inadvertently break during normal handling (ex. removing lamp from light fixture and placing it in a collection container), carefully sweep up the broken lamps, collect the material in a bag, tape the bag closed, and discard the bag in the regular trash.

3. For other than inadvertent breakage of mercury containing lamps (ex. lamp container falling over or being knocked over), carefully sweep up the broken lamps 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 dustpan
    - Plastic lined cardboard box
    - Roll of tape

5. In the event of a spill or accident involving mercury containing lamps, the following should be notified immediately:
    - Yale Environmental Health and Safety emergency number (203-785-3555)
    - Company performing the lamp removal

6. If any regulatory agency should come on site (OSHA, CTDPH, CTDEEP, EPA)
    - Ask the representative to wait until a member of EHS arrives.
    - Contact EHS immediately (203-785-3555) 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 the RCRA Compliance Officer at 203-432-9384.