Yale University
Environmental Health and Safety
Environmental Affairs Section

Mercury 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). Please refer to the *Bulb/Lamp Guidance Document for Contractors*.

2. Mercury thermostats are considered to meet the definition of Universal Waste and MUST be disposed of by Environmental Health and Safety (EHS).
   - Mercury thermostats are shipped off-site for recycling within 1 year of their accumulation start date.
   - Mercury thermostats sent off-site shall have proper shipping paperwork.
   - Shipping paperwork may only be signed by a designated member of the Environmental Affairs Section (EAS) of Environmental Health and Safety (EHS) at Yale University (203-432-6545).

3. All other mercury containing instruments/devices are considered to meet the definition of Hazardous Waste and MUST be disposed of by EHS.
   - All waste is shipped off-site for recycling.
   - A hazardous waste manifest must be used.
   - Manifests may only be signed by a designated member of EAS at Yale University (203-432-6545).

B. Container Management

1. All mercury containing instruments/devices are to be stored in DOT approved containers that are compatible with mercury and that can be securely closed.
   - Containers from 5 gallons to 55 gallons are provided by EAS. Please allow 3-5 business days for the delivery of containers.

2. Ensure each container of mercury thermostats is labeled with the words "Universal Waste" and “Mercury Thermostats."

3. Ensure each container of all other mercury containing instruments/devices is labeled with the words “Hazardous Waste” and “Mercury.”

4. Ensure each container is marked with an accumulation start date (the date the first item is placed in the container).

5. Keep each container closed when waste is not being added.

6. Store all containers in a secure, dry area away from public access.

7. Submit an online Construction Waste Supply/Removal Request Form to EHS for delivery and removal of containers.

C. Other Important Notes

1. Weekly inspections of the containers shall be carried out by a member of EAS.

2. Daily inspections of the work areas should be done by the site manager to assure no mercury has spilled on the ground, that any spills are promptly cleaned up, and that all containers are closed, properly labeled, and properly marked.

3. In the event of a spill of mercury, the following should be notified immediately:
   - Yale Environmental Health and Safety emergency number (203-785-3555)
   - Company performing the removal of the mercury instruments/devices

4. 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.

All inquiries pertaining to the storage and/or disposal of mercury instruments/devices should be directed to the RCRA Compliance Officer at 203-432-9384.