

MERCURY 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 & 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 & Safety (EHS).
 - All mercury thermostats are shipped off-site for recycling within 1 year of their accumulation start date.
 - All mercury thermostats sent off-site shall have proper shipping paperwork.
 - Shipping paperwork may only be signed by a designated member of Environmental Affairs Section (EAS) 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 can be provided by EAS, if requested in advance. Please allow 3-5 business days for the delivery of containers.
2. Ensure that each container of mercury thermostats is labeled with the words "Universal Waste" and "Mercury Thermostats."
3. Ensure that each container of all other mercury containing instruments/devices is labeled with the words "Hazardous Waste" and "Mercury."
4. Ensure that each container is marked with an accumulation start date (i.e. 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. 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.
8. Call the Environmental Affairs Section (EAS) at 432-6545 to arrange for removal of containers.

C. Other Important Notes

1. If one or more 55 gallon drums for hazardous waste are present at the site, 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 and properly marked.
3. In the event of a spill of mercury, the following should be notified immediately:
 - Yale Environmental Health & Safety emergency number (785-3555) AND
 - Brenda A. Armstrong, Environmental Affairs Manager Yale Environmental Health & Safety
Work number: 203-432-3219

- Cell phone: 203-627-8241 AND
- Company performing the removal of the mercury instruments/devices
4. If any regulatory agency should come on site (OSHA, 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.