

*September 2004*

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Recycling and Disposal of Mercury-Containing Bulbs

1. REFERENCE:

- a. The Environmental Protection Agency's (EPA) Green Light Program.
- b. 40 CFR 273, and 10 CSR 25-16. 273 "Standards for Universal Waste Management".

2. GENERAL. The Environmental Protection Agency has determined mercury containing lamps (fluorescent lamps) to be hazardous waste when they are spent "no longer used for their intended purpose", or broken. Both the Federal, and State Hazardous Waste programs encourage generators to recycle spent lamps under the provisions of the Universal Waste regulation. Recycling spent lamps promotes hazardous waste minimization, enhances waste reduction, eliminates numerous Hazardous Waste generator requirements, reduces liability to the installation, and helps protect the environment.

3. PROCEDURES.

a. The following guidance is provided to Fort Leonard Wood installation for management of spent mercury containing lamps.

(1) Fluorescent lamps will be issued to units/activities from the DPW Supply Warehouse, and the Self-Help Branch, DPW. Large users (**minimum issue of two cartons**) will receive cartons of new lamps at the DPW Supply Warehouse, Bldg. 2219. After the initial issuance of cartons of new lamps, complete cartons of spent lamps must be turned in to the DPW Lumberyard, Bldg. 2214 before cartons of new lamps are issued. Small users (**individual lamps or maximum issue of one carton**) will receive lamps from the Self-Help Branch, Bldg. 2219. Small users must return their spent lamp to Self-Help before a new lamp is issued.

(2) Tenant activities and Government owned/Contractor operated facilities will follow the same issue/turn-in procedures unless otherwise stated in their Inter service Support Agreement or contract.

(3) Purchase of fluorescent lamps through the VISA card or other supply channels besides DPW is discouraged because the government already provides this service and is upgrading to more energy efficient fixtures in which off-post lamps may not be compatible. However, if activities do purchase lamps by VISA they still must recycle the lamps.

(4) Spent lamps must be stored in their original packaging. If the packaging is not available, contact the Environmental Branch for more information on ordering appropriate packages.

b. Broken lamps must be managed as Hazardous Waste. The DPW Hazardous Waste turn-in memorandum will be followed for turn-in of broken lamps. Broken lamps will be collected in

double plastic bags and placed in a suitable container. The installation Spill Prevention and Response Plan must be followed in the event of a spill. Tenant activities and Government owned/Contractor operated facilities are responsible for turn-in of Hazardous Waste to the Defense Reutilization and Marketing Office for disposal unless otherwise stated in their Inter service Support Agreement or contract.

4. Family housing occupants receive fluorescent lamps from DPW Self-Help. Spent fluorescent lamps from family housing are household hazardous wastes and are exempt from the Resource Conservation and Recovery Act (RCRA), but occupants are encourage to return them to Self-Help for recycling.

5. PROPONENCY. The proponent for this action is the Directorate of Public Works, Environmental Division, 596-0882.

FOR THE COMMANDER:

Directorate of Public Works

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