

# Handling Spent Electric Lamps

## Frequently Asked Questions by Business

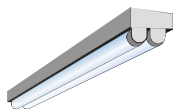


Fact Sheet

*Choosing how to properly handle your spent electric lamps can be confusing. The following questions and answers are meant to make your decision easier. For more detailed information about the regulatory requirements, please refer to DEQ Waste Management Division fact sheets, "Electric Lamps" and "Universal Waste." Copies can be obtained free of charge by calling the Environmental Assistance Center at 800-662-9278 or viewed on the Internet at [www.deq.state.mi.us/ead/pub/pubwaste.html](http://www.deq.state.mi.us/ead/pub/pubwaste.html). Direct any questions about the waste regulations and lamp management requirements to your Waste Management Division district office.*

Q. What can I do with my spent fluorescent lamps?

A. Preferably, recycle them.





Q. Why?

A. Proper recycling ensures that the mercury in fluorescent and other types of electric lamps does not contaminate the environment.

Q. Can't I just throw them away?

A. Electric lamps can only be disposed of in a licensed landfill that is willing to accept them if:

-  the business is conditionally exempt; or
-  the lamps are not considered hazardous waste because of the low mercury content. However, there may be future liability concerns if the landfill becomes contaminated.

Q. Is that why the DEQ recommends recycling for all fluorescent and other electric lamps, even the low mercury ones?

A. Yes, that is part of the answer. The other concern is the mercury in the lamps. Mercury has been recognized for some time as a toxic substance; it can vaporize and get into the environment easily, leading to exposure to wildlife and humans.

Q. Are the new low mercury lamps a good option?

A. Yes, because less mercury is used in the manufacture, use, and handling of a lamp (source reduction) and this reduces environmental risk. However, low mercury

lamps still contain mercury and recycling is still recommended.

Q. O.K., then how do I go about recycling my lamps?

A. First, check out the *Electric Lamp* publication at our publication web site that contains a list of lamp recyclers. Or, contact a recycler listed in the *Recycled Materials Market Directory*, also available on the Internet at [www.deq.state.mi.us/ead/recycle](http://www.deq.state.mi.us/ead/recycle). You can request a printed copy of either publication by calling 800-662-9278.

Q. Then what?

A. Your recycler should explain your two basic options. Ship your lamps to the recycler, (managed as either a hazardous waste or as a universal waste), or have the recycling company come to your facility.

Q. What are universal wastes?

A. These are specific hazardous waste streams

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that a company can choose to manage in an alternative manner in place of the more complex hazardous waste requirements.

- Q. What types of electric lamps are considered universal wastes?
- A. Fluorescent, high intensity discharge, sodium vapor, mercury vapor, neon, and incandescent.
- Q. What are the advantages of shipping my lamps to a recycler as a universal waste?
- A. Listed below are several advantages that can save you time and money.
1. Universal waste volume is not included when determining “hazardous waste generator” status.
  2. Universal waste can be accumulated for a longer time than hazardous waste for businesses that are small and large quantity generators (up to one year).
  3. Less labeling is required on universal waste.
  4. A hazardous waste manifest is not necessary to ship the waste in Michigan or in other states that recognize the lamps as universal waste. (Shipping papers would still be required if the waste were a U.S. Department of Transportation [DOT] hazardous material. To qualify as a DOT hazardous material, one container would need to hold one pound or more of mercury. One package would need to hold about 20,591 regular four-foot fluorescent lamps to make a pound of mercury.)
  5. Using a permitted and registered hazardous waste transporter is not required.



- Q. What do I need to do if I ship my lamps as a universal waste?
- A. Certain requirements must be followed to ship universal waste properly.
1. Label the individual lamps or storage containers with the words “Universal Waste Electric Lamps” or “Waste Electric Lamps” or “Used Electric Lamps.”
  2. Package the lamps so there will be minimal breakage during normal handling



conditions. Usually the box used to ship the new bulbs is suitable to package the intact spent bulbs.

3. Do not crush or break the lamps.
4. Contain any release of lamp fragments or residues immediately.
5. A handler must also show how long the waste has been held by doing any of the following:
  - labeling the container;
  - labeling the individual item;
  - maintaining an inventory system;
  - placing the universal waste in a specific accumulation area; or
  - using any other method that clearly demonstrates how long the universal waste has been accumulated.

- Q. Can I reduce my lamp recycling liability?
- A. Yes. At a minimum, follow these steps:
1. Keep accurate records of installation, removal, and storage of lamps.
  2. Demand proof that the waste is being recycled.
  3. Work with quality companies that provide a record of the decontamination and final disposition of materials.
  4. Handle and package your lamps carefully.
- Q. If I do not have low mercury lamps and I do not recycle, what must I do with my hazardous waste lamps?
- A. The specific requirements will depend on your hazardous waste generator status. In general, you need to do these things:
1. Manage them on-site as a hazardous waste including proper labeling, accumulation, and container inspections.
  2. Manifest them as a hazardous waste when shipping off-site and meet all of those requirements.
  3. Use a permitted and registered hazardous waste transporter and ship to a licensed hazardous waste treatment, storage, and disposal facility.

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