Overview
Some light bulbs and lamps may contain toxic metals such as mercury that require special disposal. The United States Environmental Protection Agency (EPA) regulates these light bulbs and as universal waste lamps. Common examples of universal waste lamps include, but are not limited to, fluorescent, high-intensity discharge (HID), neon, ultraviolet (UV), mercury vapor, high-pressure sodium, and metal halide lamps.

This Update provides guidance on the proper handling, storage, and disposal of universal waste lamps at Weill Cornell Medicine (WCM).

Applicability
This procedure applies to all WCM employees and contractors working on behalf of WCM who generate and/or handle universal waste lamps.

Responsibilities
Environmental Health and Safety (EHS) ensures that generators of universal waste lamps are provided guidelines for proper handling, storage, and disposal. EHS also ensures that universal waste lamps are disposed in accordance with all federal, state, and local regulations.

Laboratories must verify that all universal waste lamps generated from laboratory equipment (e.g., mercury arc lamps) are collected, stored, and managed as established in this Update.

Engineering and Maintenance confirms that all universal waste lamps generated from the routine maintenance of the WCM’s facilities are collected, stored, and managed as mandated in their internal procedure SOP-EM-30-121.

Project Managers ensure that all universal waste lamps generated from renovations and/or other projects in WCM facilities, including oversight of contractors, are collected, stored, and managed as detailed in this Update and disposed via EHS.

Contractors ensure that all universal waste lamps generated from their work activities are collected, stored, and managed as established this Update and only disposed of via EHS.

Contact EHS prior to all projects which will generate universal waste lamps to further discuss management procedures.

Procedure
HANDLING
All universal waste lamps are to be handled and stored in a manner to prevent breakage. The lamps (unbroken) must be placed into containers or packages that:
- Are structurally sound
- Are adequate to prevent breakage
- Remain closed
- Lack evidence of leakage or spillage
If the generator does not possess an adequate container or package, then immediately submit a community request via Salute for the lamp(s) to EHS for proper packaging and disposal.

The containers and packages must be labeled with the words "Universal Waste - Lamps."

While accumulating lamps, the containers or packages must be stored in a satellite accumulation area designated as a Chemical Waste Satellite Accumulation Area. Once the containers are full or as desired by the generator, a request should be submitted via Salute for collection and disposal of the universal waste lamps by EHS.

BROKEN LAMPS

Broken lamps are no longer considered universal wastes and must be managed as mandated by WCM's Chemical Spill Planning and Response Procedures. The wastes generated from the clean-up operations must be managed as detailed in WCM's Chemical Waste Disposal Procedures. At a minimum, the broken lamps must comply with the following:

- Placed into a hard-walled container which is sealable
- The container must have a Hazardous Waste label with the words "Sharps - Broken Lamps"
- Store the container in a placarded Chemical Waste Satellite Accumulation Area
- Submit a Chemical waste request via Salute to EHS for collection and disposal.

Definitions

Universal Waste Lamps are lamps that, due to the presence of toxic heavy metals such as mercury or lead, must comply with EPA regulations when disposed of. These include, but are not limited to, fluorescent, high-intensity discharge (HID), neon, mercury vapor, high-pressure sodium, and metal halide lamps. Note: incandescent bulbs, including halogen bulbs, do not contain any of these heavy metals of concern and are therefore not included in this definition.

References

- 6NYCRR, Subpart 374-3: Standards for Universal Wastes
- Salute Safety, https://ehs.salutesafety.com/users/sign_in