

St. Lawrence University

Universal Waste

Storage Area Requirements

Waste lamps that contain mercury are considered Universal Wastes and must be managed in accordance with New York Department of Environmental Conservation (DEC) regulations which are designed to ensure that the lamps are recycled, and that the mercury inside the waste lamps is not released into the environment.

St. Lawrence University will manage all waste Mercury-Containing Lamps (includes all fluorescent, high density discharge, neon, mercury vapor, high pressure sodium, and metal halide bulbs/lamps) as follows:

1. In a way that prevents releases of universal waste to the environment (i.e., the waste lamps are to be stored in closed boxes indoors).
2. The containers used to store the waste lamps (i.e., cardboard boxes or fiberdrums) must be:
 - Kept **closed** (except when adding or removing lamps from the container);
 - Structurally sound;
 - Adequate to prevent breakage;
 - Compatible with the contents of the lamps; and
 - Lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.
3. The containers used to store waste lamps must be labeled:
“Universal Waste”
 - Make sure the container in your area is labeled “Universal Waste.”
 - Make sure the “Contents” line on the Universal Waste label is marked with one of the following phrases: “Lamps”, or “Waste Lamps”, or “Used Lamps” — pen this phrase in on the label if necessary.

St. Lawrence University is not allowed to store waste lamps on campus for longer than one year, therefore:

4. The Universal Waste label must be marked with an “Accumulation Start Date.”
 - Make sure the container used to store the waste lamps is marked with the date that the **first** waste lamp is placed in the box.
 - Mark this date on the bottom of the Universal Waste label in the space provided.

When the Universal Waste container is full of waste lamps, notify your supervisor, who will arrange for pick-up and transportation to the main Universal Waste Storage Area at the Facilities Operations Center. In any case, notify your supervisor before the one year storage date expires on any container of waste lamps.

St. Lawrence University Universal Waste/Hazardous Waste Storage Area Requirements

- β Any Mercury-Containing Lamp that is broken or shows evidence of breakage, leakage, or damage must be placed in a container that is closed, and managed as Hazardous Waste.

St. Lawrence University will manage all broken/damaged Mercury-Containing Lamps (includes all fluorescent, high density discharge, neon, mercury vapor, high pressure sodium, and metal halide bulbs/lamps) through the hazardous waste program as follows:

The following procedures should be used to clean up broken or damaged lamps:

- Always wear safety glasses and disposable rubber gloves when cleaning up broken lamps. Avoid skin contact with mercury or surfaces that have been contaminated with mercury. Wash your hands and face after cleaning up any universal waste spill.
- Place the broken glass and debris in an appropriate container (i.e., a sealable clear plastic bag).
- Scoop or wipe up as much of the discharged material as possible, and place the rags and any other clean-up items in the plastic bag(s).
- Wipe the spill area thoroughly with a wet sponge, and/or go over the area with masking tape to pick up small particles of mercury. Place sponge, tape, and/or rags in the plastic bag(s).
- Seal the plastic bag, and place the bag in a closed plastic 5 gallon pail.
- Make sure the container is kept closed, and is labeled “Hazardous Waste” and with other words identifying the contents (i.e., broken fluorescent lamps). **Do not put any dates on this label.**
- Contact your supervisor for waste pick-up when the hazardous waste container is full. Your supervisor will arrange for the pickup within 3 days to have the container moved to the designated “180-Day” Hazardous Waste Storage Area. The manager of the 180-Day Storage Area/EH&S will coordinate the acceptance, dating and logging in of the waste at the 180-Day Storage Area.