

Guidance:

Jniversal Waste Lam

Universal Waste (UW) lamps are collected per 40 CFR 273. Fluorescent lamps contain lead and mercury and must be handled with care to avoid becoming a Hazardous Waste (HW). EMD Will handle the disposal of UW Lamps for Fort Knox, as well as broken HW lamps which are governed by 40 CFR 262.

A Universal Waste Collection Area (UWCA) request must be made by calling the Environmental Management Division Hazardous Waste (EMDHW) Program Manager. If they determine that you collect enough lamps to require a UWCA, they will set one up for you. The UWCA Manager should have Environmental Officer (EO) training in order to know and understand the rules of managing a UWCA.

The location of the UWCA should be in a secure area to avoid accidents, or damage to the container, and must be kept clean. The container provided will be properly labeled by EMDHW and you will add a start date when the first lamp is placed in the container. The container is to be turned in to EMDHW personnel within one (1) year of the start date. This container must be closed when not in use, free of damage, intact and must stay in its designated area at all times. Care must be taken to ensure that there are no other UW lamps other than those listed on the outside of the container, i.e.: no Compact Fluorescent Lamps (CFL) bulbs mixed in the 4' lamp tube.

Labels must be facing out and the date in use must be clearly written and visible as well. EMDHW Will inspect at least once a month via in person or virtual inspection to verify compliance. Remember, the container is in your care. While EMDHW will inspect your UWCA at least once a month, you are responsible for the contents, care and handling of the UWCA until it is in the care of EMDHW.

BLUF: Your UWCA. Your responsibility.



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