

**Great Western Painting**  
**Universal Waste Policy Statement**  
**Handling and Disposal of Mercury-Containing Light Bulbs**  
**40 CFR Part 273 Standards for Universal Waste Management**

**Note:** Universal wastes are wastes that meet hazardous waste criteria but, because they pose a relatively low-risk compared to other hazardous wastes they are exempt from regulation as hazardous waste.

As a user of fluorescent lamps (linear and compact fluorescent) and high intensity discharge (HID) lamps which contain mercury vapor, metal halide, and high pressure sodium lamps; we, as a company, are considered a small quantity (less than 11,000 pounds of accumulated waste) handler by the Environmental Protection Agency.

Management and disposal by businesses of fluorescent light bulbs and other mercury-containing bulbs are regulated under the Resource Conservation and Recovery Act (RCRA) Universal Waste Rule (UWR) and Subtitle C hazardous waste regulations. It may also regulated be regulated by local state EPA offices.

**Options for recycling mercury-containing lamps:**

1. We will contact our local solid waste district or municipality for information about the availability of nearby collection sites. Many hardware stores and other retailers offer free collection programs for smaller quantities of lamps from businesses.
2. Some electrical wholesale suppliers accept lamps from their customers for recycling.
3. Lamp recycling facilities (out-of-state) have pick-up and mail-back programs for spent lamps.
4. We may not store on site spent lamps for no more than one year. We may, however, self-transport mercury-containing lamps to a Universal Waste Handler without a manifest.

**Storage requirements for mercury-containing lamps:**

1. We are required to package lamps in structurally sound containers (boxes) that prevent breakage. Boxes or containers must be:
2. Kept closed and sealed with tape once full (Do not tape lamps together);
3. Labeled with words like "Universal Waste Lamps" or "Waste Lamps;"
4. Stacked no higher than five feet; and

**Clean-up procedures for broken mercury-containing lamps:**

1. Do Not Vacuum or Sweep Up the Broken Lamps. This-may spread any mercury vapor that is present to other rooms. Keep all people away from the breakage area.

2. Ventilate the room by closing all interior doors and vents, opening windows and any exterior doors in the room and leaving the room (restrict access) for at least 15 minutes.
3. Remove all materials you can, and don't use a vacuum cleaner.
  - Wear disposable gloves if available
  - Carefully scoop up the glass fragments and powder with a stiff paper or cardboard (such as playing cards or index cards)
  - Pick up any remaining small pieces of glass and powder using sticky tape (such as masking or duct tape)
  - Wipe the area clean with a damp paper towel or disposable wet wipe
  - Place all cleanup materials (cardboard, gloves, tape, etc.) into a glass or rigid container with a lid.
4. Wash your hands.
5. Leave windows in the affected room open as long as practical (weather permitting).

**Elemental Mercury:**

OSHA PEL: TWA 0.1 mg/m<sup>3</sup>

**Physical Description:** Metal: Silver-white, heavy, odorless liquid.

**Exposure Routes:** Inhalation, skin absorption, ingestion, skin and/or eye contact.

**Health Hazards:** Irritation eyes, skin; cough, chest pain, dyspnea (breathing difficulty), bronchitis, pneumonitis; tremor, insomnia, irritability, indecision, headache, lassitude (weakness, exhaustion); stomatitis, salivation; gastrointestinal disturbance, anorexia, weight loss; proteinuria.

**First Aid:**

**Eye** Irrigate immediately  
**Skin:** Soap wash promptly

This Policy Statement will be conspicuously posted.

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Patrick Evje  
Safety Director