

FORT CAMPBELL ENVIRONMENTAL HANDBOOK
Guidance and Instruction
FLUORESCENT TUBES AND MERCURY-CONTAINING LAMPS

1. Purpose and Scope:

- a. To provide information necessary to properly manage and store used fluorescent tubes and mercury-containing lamps at Fort Campbell, Kentucky.
- b. To identify accumulation areas that these bulbs and lamps can be taken to be packaged and shipment to a recycling facility.

2. Reference: 40 CFR 273, Subpart A, and Tennessee Rule 1200-1-1 I-.12, Standards for Universal Waste Management.

Note: Prior to 1997, fluorescent tubes and mercury-containing lamps were put in solid waste containers and taken to the landfills as a municipal waste. **Under no circumstances will a bulb or lamp be placed in a solid waste container (dumpster) or carried to a municipal landfill.** The following guidance and instruction will direct you on what to do with these tubes and lamps.

3. Definitions:

- a. Mercury Containing Lamp – an electric lamp in which mercury is purposely introduced by the manufacture for the operation of the lamp. Mercury-containing lamps include fluorescent, high pressure sodium, mercury vapor, and metal halide lamps.
- b. Universal Waste – common hazardous wastes such as batteries, recalled pesticides, thermostats, and mercury-containing bulbs and lamps that are generated, stored, and eventually recycled or reclaimed off-site. Management of these wastes is less regulated than wastes handled under Resource Conservation and Recovery Act (RCRA) regulations.
- c. Accumulation Area – an area designated for the bulk storage, packaging, and eventual shipment of used mercury-containing tubes and bulbs, and in which these items can be stored for up to a year before disposal. Routine administrative areas and buildings may not be used for storage of tubes and bulbs beyond the amount that can reasonably be expected to be used in the period of one year.
- d. Universal Waste Handler – the owner or operator of a facility that accumulates universal waste and sends universal waste to another universal waste handler, to a destination facility, or to a foreign destination.
- e. Destination Facility – a facility that treats, disposes of, or recycles a particular category of universal waste. A facility at which a particular category of universal waste is only accumulated is not a destination facility for purposes of managing the category of universal waste.

FORT CAMPBELL ENVIRONMENTAL HANDBOOK
Guidance and Instruction
FLUORESCENT TUBES AND MERCURY-CONTAINING LAMPS

- f. Universal Waste Transporter – a person engaged in the off-site transportation of universal waste by air, rail, highway, or water.
- g. Approved Container – a container used for storage of universal wastes that has been approved under Department of Transportation (DOT) regulations found at 49 CFR 172-180.

4. Responsibilities:

- a. Unit Commander / Activity Director: Provide command emphasis to the fluorescent tube and mercury-containing lamps management program to reduce the potential for RCRA violations.
- b. Environmental Quality Officer (EQO):
 - (1) Maintain areas for accountability and management of fluorescent tubes and other mercury-containing lamps.
 - (2) Advise units and activities of the changes in management of the tubes and lamps.
 - (3) Establish a standard operating procedure (SOP) for handling the tubes and bulbs along with training on how to remove and handle the tubes and lamps.
 - (4) Assure units and activities turn in fluorescent tubes and other mercury-containing lamps to an approved accumulation point identified in Appendix A.
 - (5) Units and Activities: Units and Activities will follow the directions of the EQO and this guidance and instruction which can be found in Tab 11 of the Fort Campbell Environmental Handbook.

5. Instructions:

- a. It is recommended to do a complete sweep of your area and replace all the tubes at once due to the 72 hour time period to turn in all of the used tubes (with or without green end caps) to the designated accumulation point.
- b. Replacement bulbs manufactured by Phillips Company (with green end caps) are considered non-hazardous due to the extremely low mercury content and will be collected and taken to the designated accumulation point to be sorted and disposed of properly within 72 hours from removal.

FORT CAMPBELL ENVIRONMENTAL HANDBOOK
Guidance and Instruction
FLUORESCENT TUBES AND MERCURY-CONTAINING LAMPS

- c. Used fluorescent tubes (with no green end caps) and other mercury-containing lamps will be taken to the designated accumulation point within 72 hours from removal.
- d. At the accumulation point the bulbs will be packed in DOT approved fiber drums provided by the contractor and labeled with a Universal Waste label for shipment and eventually removed off site for recycling. All other bulbs will remain at the various locations indicated as accumulation areas and identified at Appendix A. They will then be packed in DOT approved fiber drums furnished by the contractor and labeled Universal Waste and then picked up on an as-needed basis. All contractor-generated bulbs shall also be taken to the PPOC for proper disposition.
- e. At the accumulation areas the fiber drums will be filled with spent tubes or lamps, a call will be made to the PWBC Pollution Prevention Branch, telephone 798-9786 to schedule an on-site pick-up.
- f. An approved recycling contractor at the designated accumulation locations will pick up the accumulation containers on a monthly basis. All the accumulation containers will then be replaced.

6. Broken Tubes:

- a. While wearing all required Personal Protective Equipment (PPE), pick up all large pieces of the broken tube(s) and sweep up the remaining smaller particles into a dust pan and place the broken tube in a trash bag.
- b. The broken tube(s) must be taken to the designated accumulation point within 72 hours of the clean up.

7. Additional Guidance:

- a. For additional information related to fluorescent tubes and other mercury-containing lamps, contact the PWBC Environmental Division, Pollution Prevention Branch, at telephone number 798-9786 or 798-9763.
- b. For future reference, place this document behind tab number 11 in your Fort Campbell Environmental Handbook.

FORT CAMPBELL ENVIRONMENTAL HANDBOOK
Guidance and Instruction
FLUORESCENT TUBES AND MERCURY-CONTAINING LAMPS

APPROVED ACCUMULATION AREAS FOR MERCURY-CONTAINING BULBS

1. PWBC – Troop Self-Help Issue Point, Building 849.
2. Blanchfield Army Community Hospital – J & J Maintenance, Building 650.
3. Fort Campbell Dependent Schools Receiving Warehouse, Building 1110.
4. DACA (Post Commissary), Building 2702.
5. PX (AAFES), Building 2840.
6. Pollution Prevention Operations Center, 2nd and Wickham Avenue.