

# MANAGEMENT MEMO

NUMBER:

**MM 05-16**

SUBJECT:

**GUIDANCE FOR PROPER MANAGEMENT OF  
FLUORESCENT LAMPS BY STATE AGENCIES**

DATE ISSUED:

OCTOBER 19, 2005

EXPIRES:

OCTOBER 19, 2006

REFERENCES:

California Universal Waste Rule, Title 22, California Code of Regulations, Division 4.5, Chapter 23, Section 66273.1

ISSUING AGENCY:

DEPARTMENT OF  
GENERAL SERVICES

**Introduction** This Management Memo notifies State Agencies of a new subject in the State Administrative Manual (SAM) Chapter 1300, RESD, Building and Property Management Branch Section. The new section is **Guidance for Proper Management of Fluorescent Lamps by State Agencies – 1339.9**.

**Background** The California Universal Waste Rule mandates that State Agencies must recycle Fluorescent Lamps in order to manage them as a Universal Waste. If not recycled, fluorescent lamps must be managed as fully regulated hazardous waste. This mandate is administered by the State of California, Department of Toxic Substances Control (DTSC) as the California Universal Waste Rule (UWR).

**Mandate for Proper Management** The mandate for proper management of fluorescent lamps in the UWR means:

- Regulated parties may manage their lamps per the streamlined provisions of the UWR (instead of the full hazardous waste regulations) if their wastes are sent to a recycling facility.
- A bill of lading and common carrier can be used to transport intact lamps to a recycling facility.

**Lamp Recyclers** A listing of Lamp Recyclers can be found on the Internet at <http://www.lamprecycle.org>. State of California facilities that generate fluorescent lamps must contact a lamp recycler and develop a program based on a pre-determined frequency for disposition.

*continued on next page*

---

**Lamp  
Recyclers  
(con't)**

Additional information on the recycling of fluorescent lamps is available on the Internet at <http://almr.org>, and DTSC Fact Sheet – Managing Universal Waste in California issued by the DTSC may be viewed on the Internet at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).

---

**Universal  
Waste  
Regulations**

This Management Memo does not substitute for the State's universal waste regulations. For additional review of the UWR regulations, please view the UWR on-line via the Office of Administrative Law (OAL) website at <http://ccr.oal.ca.gov>. The Universal Waste Regulations are in the California Code of Regulations, Title 22, division 4.5, Chapter 23 (section 66273.7 et. seq.).

The Environmental Protection Agency (EPA) and DTSC encourage the recycling of these hazardous wastes under the UWR with the intent that less hazardous waste (mercury, lead and cadmium) will enter the overall municipal waste stream. The following information describes the requirements of the UWR.

---

**Generator  
Status**

- If a handler accumulates >5,000 Kg of universal waste at any time, the handler is a large quantity handler of universal waste and is required to have an EPA identification number.
- With recent changes in the UWR, all handlers must now retain records of shipments including the type and number of items, their destination, and date of shipment. Records must be kept for three years. For more detail, see the UWR, section 66273.19. Small quantity handlers of universal waste are not required to have an EPA identification number nor are they required to track shipments.
- Contractors who remove universal waste lamps from service are considered handlers and co-generators of the waste.
- Existing handlers need not re-notify the EPA of any additional universal waste activities.
- The universal waste notification requirement is only a new requirement for generators of universal waste lamps that never generated more than 100 Kg of hazardous waste in a calendar month, but now accumulate more than 5,000 Kg of universal waste (excluding waste cathode ray tubes). Other universal wastes such as batteries etc. also count toward the 5,000 Kg limit.

Both large and small quantity handlers of universal waste are required to follow the universal waste regulations concerning waste management, labeling/marketing, accumulation time limits, employee training, response to releases, offsite shipments and exports. Excerpts of these regulations are summarized below.

---

*continued on next page*

---

**Waste Management**

- All handlers of universal waste lamps must not mix waste lamps with other wastes.
- All intentionally crushed lamps must be managed as fully-regulated hazardous waste, and shall be manifested and shipped by a licensed hazardous waste transporter.

Unintentionally broken lamps may be transported to a recycling facility via a common carrier and bill of lading so long as such lamps or components of the lamps are properly packaged so as to prevent releases to the environment.

---

**Labeling of Lamps**

- All fluorescent lamps and containers must be labeled with either “Universal Waste-Lamps”, “Waste Lamps” or “Used Lamps” while the lamps are onsite at their facility awaiting disposition.
- Labels may remain on the containers during transport to the final recycling facility.

---

**Accumulation Dates**

- All generators and handlers of universal waste lamps must be able to demonstrate compliance with the one-year accumulation time limit, which can be verified by bill of lading records and recycling certificates.
- Compliance with the accumulation time limits may also be demonstrated by an inventory system or placing the accumulation start date on a container label.

---

**USDOT Shipping Descriptions**

- Fluorescent lamps are considered United States Department of Transportation (USDOT) non-regulated.
- USDOT hazardous materials regulations still apply to low pressure sodium lamps as they are regulated as a “water-reactive solid”.
- If a container of mercury-containing lamps exceeds the one pound Reportable Quantity (RQ), then the generator should use the USDOT shipping description of “mercury contained in manufactured articles”.

---

*continued on next page*

---

**Record-keeping**

- Records of shipments - Keep a record of each shipment of spent lamps for at least three years after the shipment. The best record is likely to be the bill of lading for the shipment or the form used to ship via mail or a package express system. Other recordkeeping possibilities include a log book or retained invoices from a tube recycler. The records must contain the following information:
  - Name and address of the universal waste handler, destination facility, or foreign destination to whom the universal waste was sent;
  - Quantity of each type of universal waste sent (e.g., batteries, thermostats, lamps, mercury switches, etc.);
  - Date the shipment of universal waste left the facility.

Many recyclers will return a "certificate of recycling" to customers upon recycling of the customer's lamps. The certificate is another good document to retain.

---

**Land Disposal Restriction Requirements**

- Generators, transporters and universal waste consolidation facilities are exempt from the notification requirements of 40 CFR § 268.7 and the storage prohibition of 40 CFR § 268.50.
  - Destination facilities are subject to the full Land Disposal Restriction program. These rules have added minimal recordkeeping for all handlers.
- 

**Additional Information**

For further information about managing universal waste, please contact DTSC's regional Public and Business Liaisons at (800)-72TOXIC (800-728-6942) or visit [www.dtsc.ca.gov](http://www.dtsc.ca.gov).

---

**Signature**

Original SAM Management Memo signed by Ron Joseph, Director

---

Ron Joseph  
Director

---