1. PURPOSE

The purpose of this procedure is to define the methods used to ensure spent lamps are prepared for shipping under 30TAC§335.261 Universal Waste Rule.

2. SCOPE

This procedure applies to Texas State University – San Marcos Environmental Health, Safety and Risk Management employees involved in the management of spent lamps. This includes packaging of lamps, labeling packages and housekeeping in the waste lamp storage area. The operations are conducted in a dedicated portion of building 503, the old Power Plant.

3. PRECAUTIONS & LIMITATIONS

- Do NOT crush spent lamps.
- Texas State is a Large Quantity Handler of Universal Waste and can accumulate 5,000 kilograms (11,025 pounds) or more of universal waste at any one time.
- Accumulation time for Universal Waste lamps is limited to one year
- Use boxes provided by PSC or the recycle facility to store spent lamps.
- Broken lamps shall be swept up and debris will be bagged for disposal as “Crushed Lamps”.

4. TERMS

- Green Tips = Lamps that do not meet the definition of hazardous waste. These contain lower concentrations of mercury and will pass the TCLP test for mercury (i.e. they will leach less than 0.2 mg/L of mercury. They can be disposed of in a dumpster as municipal solid waste.
- Lamp = Defined as the bulb or tube portion of an electric lighting device. A lamp is specifically designed to produce radiant energy. Examples of common universal waste electric lamps include, but are not limited to, fluorescent, mercury vapor, high pressure sodium, and metal halide lamps
- RCRA = Resource Conservation Recovery Act
- Large Quantity Handler of Universal Waste = A universal waste handler who accumulates more than 5,000 kilograms (11,025 pounds) of universal waste (batteries, pesticides, thermostats, paint and paint products or lamps) calculated collectively at any one time.
- Universal Waste (UW) = Any of the following hazardous wastes that are subject to the universal waste requirements of 30 TAC§335.261 and 262: Batteries, Pesticides, Thermostats, Lamps, Paint and paint related products
- Treatment, Storage, Disposal Facility (TSDF) = The commercial waste disposal facility contracted by Texas State University to manage offsite disposal of wastes.
5. PROCEDURE

! NOTE !

Used tube shaped lamps should be packaged in the large cardboard boxes purchased from our TSDF or repacked in the new bulb boxes.

U-shaped and miscellaneous shaped fluorescent bulbs are packaged in cardboard boxes obtained from the TxState recycle center.

Metal halide bulbs and high pressure sodium lamps are packaged in cardboard boxes obtained from the TxState recycle center.

5.1 Packaging

a. Obtain appropriate pre-printed UW labels from TSDF in accordance with the following:
   - ED77496 - Tube shaped fluorescent lamps
   - ED77497 - Metal halide and sodium lamps
   - ED77498 – Miscellaneous shaped fluorescent lamps
   - ED83820 – Crushed fluorescent light bulbs

b. If necessary, use pictorial guide for assistance.

c. Write accumulation start date (month/day/year) in ink on one label and place it on the box when the box is first being filled.

! CAUTION !

Use enough tape to ensure box will not open under normal handling and transportation conditions.

d. When box is full, seal the box using 3 inch clear tape or duct tape.

e. Move box to appropriate UW lamp storage area. (Generally inside on pallets.)

f. Stack boxes in a safe and secure manner.

5.2 Maintenance

a. Sweep floor and place debris into trash bin.

b. When trash bin is 2/3 full, remove the bag and properly dispose in dumpster.

c. Inventory supplies, (labels, tape, boxes).

d. Notify Waste Management Program EHS Specialist when additional supplies are needed.
6. PERFORMANCE METRICS

Performance metrics will be measured by zero (0) violations during external regulatory audits and inspections.

7. ATTACHMENTS/APPENDICES

7.1 Appendix A – Preprinted Universal Waste Labels
PREPRINTED UNIVERSAL WASTE LABELS

UNIVERSAL WASTE
This waste is not regulated by 40CFR Part 261, but may be subject to Department of Transportation regulations.

Generator - Epa Id TXD 980 812 168       Phone (512) 245-3616
TEXAS STATE UNIVERSITY
736 SMITH RD
SAN MARCOS, TX 78666

Proper D.O.T. Shipping Name
NON DOT/NON RCRA REGULATED (UNIVERSAL WASTE, FLUORESCENT)

UNIV117H

Waste Categ: REC06
Profile#: ED77496-03
WCN: 54801-FLUORESCENT LIGHT BULBS-UNIV WASTE

UNIVERSAL WASTE
This waste is not regulated by 40CFR Part 261, but may be subject to Department of Transportation regulations.

Generator - Epa Id TXD 980 812 168       Phone (512) 245-3616
TEXAS STATE UNIVERSITY
736 SMITH RD
SAN MARCOS, TX 78666

Proper D.O.T. Shipping Name
NON REGULATED/NON RCRA REGULATED (UNIV WASTE, CRUSHED BULBS)

UNIV117H

Waste Categ: REC15
Profile#: ED83820-02
Accumulation Date: 
WCN: 43619-CRUSHED FLUORESCENT LAMPS
**PREPRINTED UNIVERSAL WASTE LABELS**

### UNIVERSAL WASTE

This waste is not regulated by 40 CFR Part 261, but may be subject to Department of Transportation regulations.

**Generator’s Name:** TEXAS STATE UNIVERSITY  
**Address:** 601 UNIVERSITY DRIVE  
**City:** SAN MARCOS  
**EPA:** TX0980812168  
**State:** TX  
**ZIP:** 78667-0747

**Shipping Description:**  
RO. MERCURY CONTAINED IN MANUFACTURED ARTICLES & UN2809 III  
540809-MISC SHAPED FLUORESCENT BULBS-UNIV

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### UNIVERSAL WASTE

This waste is not regulated by 40 CFR Part 261, but may be subject to Department of Transportation regulations.

**Generator - EPA ID:** TXD 980 812 168  
**Phone:** (512) 245-3616  
**TEXAS STATE UNIVERSITY**  
**736 SMITH RD**  
**SAN MARCOS, TX 78666**

**Proper D.O.T. Shipping Name:**  
NON DOT/NON RCRA REGULATED (METAL HALIDE/SODIUM LAMP, UNIV WASTE)

**Waste Categ:** REC42 REC15  
**Profile #:** ED77497-02  
**WCN:** 54802-METAL HALIDE/SODIUM BULBS (UNIV)  
**Hazardous Properties:**  
**Physical State:** Solid