

Universal Waste Disposal¹

Depending on Assistance Needed, Call:	
DGS – Environmental Health and Safety	202–576–8962
LEA Contact	
Other	

Situation Description

The Resource Conservation and Recovery Act (RCRA) has been amended to regulate widely generated wastes previously identified as hazardous waste, but has been re-categorized by RCRA and the EPA governing body as “Universal Waste”. The change in regulation will facilitate the environmental-sound collection and increase the proper recycling or treatment of a variety of waste types. DGS – Environmental Health and Safety will focus primarily on mercury containing “Lamps”, and will address the collection of other waste (i.e. batteries, pesticides, mercury containing switches, or small electronics, etc.) on an as needed basis. Below are suggested procedures for the proper disposal of “Universal Lamps” and material related to the function of lamps (i.e. electronic ballast) that may produce health hazards such as child development impairment, disruption of the nervous system, damage to brain functions, and various types of cancers.

The “Universal Lamp” consideration is predicated on the generator establishing the hazardous waste lamp “Universal”, and adhering to the specific handling procedures set forth for universal waste.

Procedures

Universal Lamps—

- DCPS staff shall keep all lamps (fluorescent lamps, compact fluorescent light bulbs, high pressure sodium, high intensity discharge, neon, and ultraviolet lamps) intact by placing used lamps into the original packing material.
- Responsible staff will completely seal the individual boxes to prevent leaks from bulb breakage.
- No staff will leave spent lamps unattended or in a compromising position (i.e. leaning against a wall or in an area where they can be easily broken).

¹ This Protocol contains information developed and implemented by the Environmental Health and Safety (EHS) and can be used as a guideline for other District LEAs. Each LEA should review and edit the contents to conform to their procedures and contacts.

- Lamps will not be taped together, rather stuffed with packing material when necessary to decrease bulb movement.
- Used packed lamp containers will clearly bear the labels or markings of “Universal Waste Lamps” or “Used Lamps” on two different sides of the container. Also showing on the outer surface of the container will be the date the box was designated as a “Waste Lamp Container”, site of origin, and the number and type of bulbs (example: sixty -4 foot Fluorescent Lamps). These markings will remain throughout storage and transport.
- DCPS staff will notify DGS – Environmental Health and Safety through Smart DGS when pick-up is needed, as well as, **if accidental breakage of a bulb occurs**.
 - Smart DGS Problem Type “Other HAZMAT” under the HAZMAT category.

Mercury leakage from “Universal Lamps”—

- Occupants leave the area.
- Ventilate the space for ten – fifteen minutes by closing all interiors doors and vents, and opening windows and any exterior doors.
- Shut off the central forced air heating/ air conditioning system.
- Wear disposable gloves
- Remove all material you can by carefully picking up glass fragments and residue with cardboard or stiff paper. Place residue or glass on a wet paper towel and place in a sealable plastic bag or glass jar with metal lid.
- Pick up remaining small pieces using sticky tape.
- Shine a flash light on floor area to determine if small beads of mercury are still present (*Optional: All mercury releases will not need this step - use if necessary*).
- Use an eye dropper to pick up mercury beads. Place beads on a wet paper towel and into a sealable plastic bag. (*Optional: All mercury releases will not need this step - use if necessary*).
- Wipe the area clean with damp paper towels or disposable wet wipe.
- Collect everything in a glass jar or a sealable plastic bag.
- Place jar or bag into universal waste container for lamps/bulbs.

For breakage on carpeted surfaces

- Keep the room or area closed off and ventilated to the exterior while vacuuming.
- Use a vacuum with a HEPA filter if possible.
- Contaminated cleaning materials (e.g., gloves, rags, vacuum bag, etc.) must be placed in two 6 mil plastic bags. Duct tape the 6 mil bags in a “goose neck” fashion.
- Thoroughly wash hands.
- Call DGS – Environmental Health and Safety at 202-576-8962 to report a spill, request clean up supplies, or for pick up.

PCB Leakage from fluorescent light ballast—

- Use gloves, eye protection, cloth, and Varsol/Mineral Spirits.
- Spray enough Varsol to completely cover the contaminated surface. Complete the wash/rinse a second time with Varsol to sufficiently cleanse contaminated surface.

- Take precautions to contain any runoff resulting from the cleaning. Contaminated cleaning materials (e.g., gloves, rags, etc.) must be placed in a plastic bag and disposed of in a container marked hazardous material.
- Wastes labeled as hazardous material should be differentiated at time of transport.
- Call DGS – Environmental Health and Safety at 202-576-8962 to report a spill, request clean up supplies, for pick up, or to determine whether a material release is indeed hazardous waste.

Unknown substances—

- Leave material alone. Do not disturb.
- Secure area so that school personnel are not exposed to toxic substances.
- Do not wet material or mix anything with it.
- Call DGS – Environmental Health and Safety at 202-576-8962.

Storage

Wastes generated from hazardous materials should be stored separately from regular waste and disposed in appropriate containers. There is zero tolerance for stock piling hazardous waste or wastes that are unknown in substance and origin. If you question a substance or unknown material call DGS – Environmental Health and Safety at 202-576-8962.