



United States Department of Agriculture

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Administration

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TO: FGIS POLICY BULLETIN BOARD

FROM: Anthony Goodeman, Deputy Director
Field Management Division

SUBJECT: Universal Waste Management (Storage and Disposal of
Fluorescent Lamps and Household Batteries)

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

1. PURPOSE

This policy memorandum communicates FGIS policy regarding the storage and disposal of used fluorescent lamps (light bulbs) and used household batteries. This memo is applicable to all FGIS employees and work sites. Official Agencies may use these instructions as well; however, they should review applicable national and local policies to ensure compliance.

2. BACKGROUND

FGIS is a small quantity handler of used fluorescent lamps and household batteries, referred to as universal waste. During a recent FGIS office and lab safety audit, it was discovered that present FGIS policy regarding the storage and disposal of universal waste (i.e., used fluorescent lamps and household batteries) needed clarification.

3. POLICY

a. Waste Management.

Manage universal waste (fluorescent lamps and household batteries) storage and disposal in FGIS Field Offices and duty point locations according to the directions in this policy memorandum.

Used fluorescent lamps and batteries that are stored and disposed of must be managed in a way that prevents the release of any component of these items to the environment.

Store any used fluorescent lamp or household battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, compatible with the contents of the fluorescent lamps or batteries, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

b. Labeling/Marking.

Used fluorescent lamps and household batteries must be labeled or marked to identify the type of universal waste as specified below:

- (1) Each lamp or a container in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste—Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)."
- (2) Universal waste batteries (i.e., each battery) or a container in which the batteries are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste—Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies);"

c. Accumulation Time Limits.

- (1) Used fluorescent lamps and household batteries may accumulate for no longer than one year from the date that they are stored for disposal, unless the requirements of paragraph (b) of this section are met.
- (2) Used fluorescent lamps and household batteries may accumulate for longer than one year from the date that they are stored for disposal, if such activity is solely for the purpose of accumulation of such quantities of used fluorescent lamps and household batteries as necessary to facilitate proper recovery, treatment, or disposal.

- (3) Any location that accumulates used fluorescent lamps or household batteries must be able to demonstrate that the items are in used condition and the length of time that the used items have been accumulating for, or the date the items were received and determined to be used and ready for safe waste disposal. Under the direction of the field office collateral duty safety and health officer (CDSHO), staff should take the following steps to make this determination:
- (a) Place the fluorescent lamps or batteries in a container and mark or label the container with the earliest date that the first item was placed in the container where stored, and determined to be used requiring safe waste disposal.
 - (b) Mark or label each individual item or containers of items (i.e., each fluorescent lamp or battery) with the date stored, or the date received, and determined to be ready for safe waste disposal.
 - (c) The CDSHO will maintain an inventory system on-site that identifies the date each container of used fluorescent lamps or household batteries were stored, or received and determined to be used and ready for safe waste disposal.
 - (d) If applicable, the CDSHO will designate an accumulation storage area for used fluorescent lamps and household batteries. Any containers in this area must be clearly marked or labeled to identify the earliest date the items were stored, or received in the area, and were determined to be used and ready for safe disposal.

d. Disposal.

The Field Office CDSHO, in conjunction with the Field Office Manager, will be responsible for determining the designated storage and accumulation areas for used fluorescent lamps and household batteries for their respective Field Office and the respective duty point locations under their Field Office's territory.

The CDSHO will also be responsible for keeping their office in compliance with all federal and state laws, with regards to the proper safe disposal of fluorescent lamps and household batteries received in the office and determined to be used and ready for safe disposal.

e. Response to releases.

The CDSHO must also determine whether any material resulting from the release (breakage or spillage) is hazardous, and if so, must manage the hazardous waste in compliance with all applicable requirements of 40 CFR parts 260 through 272.

The Field Office or duty point location would be considered the generator of the material resulting from the release, and must manage it in compliance with 40 CFR part 262.

4. QUESTIONS

Direct any questions concerning this policy to Mark Kemp, Safety and Health Manager, Management and Budget Services, at (202) 720-0061 or email at Mark.L.Kemp@usda.gov.