FORT RUCKER
Environmental Document

ENV-SW003: Used Lamps Management
(01 OCTOBER 2026)

Approved by: *Julie Majors/Travis Farmer*

1.0 PURPOSE

This procedure defines the requirements for management of used lamps on Fort Rucker. Control of environmental procedures is addressed in procedure ENV-P002: Document Control.

2.0 SCOPE

This procedure applies to all Fort Rucker operations that generate used lamps, including those activities located at facilities outside the contiguous boundary of the installation. The requirements of this procedure are applicable to all military, civilian and contract personnel at Fort Rucker.

3.0 DEFINITIONS

Term	Definition
Accumulation Start Date (ASD)	The accumulation start date is the date the first item is placed in the container.
DPW-ENRD	Directorate of Public Works, Environmental and Natural Resources Division, located in Bldg. 1121, telephone number 334-255-0487
Environmental Officer	The Environmental Officer is the main contact within an organization for ensuring continued compliance with regulatory requirements. These personnel are assigned in accordance with GC Policy Memo 25-35.
Green-Tipped Lamp	A fluorescent lamp with low mercury content. Typically, the lamp has green tips, green marking, or green writing stating “low mercury content” on the lamp.
HMCC	Hazardous Material Control Center, located in Bldg. 1315, telephone number 334-255-1470
HWCAA	Hazardous Waste Central Accumulation Area
HWMP	The Fort Rucker Hazardous Waste Management Plan documents procedures to ensure each step in the "cradle-to-grave" management of waste with hazardous characteristics is carried out in a consistent manner and in accordance with regulatory requirements. Procedures are either referenced or included in the HWMP, as necessary, to provide documented waste management instructions, from the time of waste generation until it is transported offsite for reuse or disposal.

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Term	Definition
Used Lamps	Used lamps, also referred to as "universal waste lamp", means the bulb or tube portion of an electric lighting device. Examples of common universal waste electric lamps include, but are not limited to, fluorescent lamps of various sizes, high intensity discharge (HID), neon, mercury vapor, high pressure sodium, metal halide and germicidal lamps.
Universal Waste	Universal wastes are hazardous wastes that are subject to less stringent hazardous waste management regulations, particularly by allowing more time for accumulation of these wastes in order to facilitate appropriate recycling or disposal.

4.0 RESPONSIBILITIES

It is the responsibility of each unit, organization or contractor working on Fort Rucker to follow these procedures.

5.0 PROCEDURE

5.1 Purchase

5.1.1 In accordance with Green Procurement Guidance, environmentally friendly items will be purchased where feasible. Green-tipped lamps will be purchased/used where available.

5.1.2 The most common types of green-tipped lamps will be made available through Self Help (Bldg. 1427), either one at a time replacement quantities or by the box. Individual credit card holders are responsible for purchasing replacement green-tipped lamps where practical.

5.2 Management of Used Lamps

5.2.1 All used lamps, including green-tipped lamps, will be managed as Universal Waste lamps.

5.2.2 Always open a new lamp box by the pull flap. Never cut off flaps or “window cut” boxes. When all new lamps are used and the box is empty, this box now becomes suitable for used lamp accumulation.

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5.2.3 Used Lamp Management:

5.2.3.1 Lamps that are no longer usable are Universal Waste according to the applicable regulations.

5.2.3.2 Accumulating used lamps:

(a) When a used lamp is first placed into a box or fiber drum, that container must be labeled (please see the HWMP for example labels and verbiage). The label must meet the following requirements:

- All labels must be visible from the front of the box
- All labels must be right side up
- All labels must contain:
  - the words "UNIVERSAL WASTE", and
  - the words “Used Lamps”, and
  - the accumulation start date (ASD) (the date the first used lamp was placed in the container).

(b) Box(es) or fiber drums containing used lamps must be kept closed except when lamps are being added to it.

(c) Filling a used lamp box on a 30-45 degree angle will help in placing lamps in layer fashion, allowing more to be placed in the box.

(d) Lamps must be segregated by type and by size. For example, all 4-foot fluorescent lamps should be in a separate box from 8-foot fluorescent lamps, from compact fluorescent lamps (CFLs), etc.

(e) Individual used lamps or partially-filled containers (boxes or fiber drums) may be turned in to the HMCC, each work day between 0730 and 1600. No container should be maintained longer than 6-months from the ASD, regardless of whether it is full or not.

(f) Containers that are full or approaching 6-months from ASD are to be turned in to an HWCAA, accompanied by a completed AVCOE Form 2758 per ENV-SW001: Waste Turn-In Procedure. Coordinate with HWCAA managers to turn in containers at Cairns HWCAA or Shell HWCAA. The Main Post HWCAA is available for turn in each Thursday from 0900-1130 or by appointment at 334-255-1470.

(g) Waste profile W31BMV0263 should be used for intact Universal Waste lamps.

5.3 Broken Mercury-Containing Used Lamp Clean-Up

When handling used lamps, use caution to avoid breaking the lamps as mercury will be released into the atmosphere. If a mercury-containing lamp is broken, the lamp(s) should be managed as hazardous waste. Please reference the HWMP for detailed management procedures. Note that your unit’s, organization’s or contractor’s Environmental Officer or

Hazardous Waste Manager are typically the only individuals trained within your organization to manage hazardous waste. If one of these individuals is not available to clean up the broken mercury lamp, please notify the Fire Department (911) and the Work Control Center at 334-255-9041.

If a lamp breaks, follow the procedure below:

5.3.1 If not trained in hazardous waste cleanup, please call 911 and the Work Control Center at 334-255-9041 for assistance. Note that if the lamp is green tipped, any individual may clean-up the broken glass, since little mercury remains. If one cannot determine if the lamp is a low mercury lamp, the broken lamp is to be managed as a mercury-containing lamp.

5.3.2 Keep all people away from the breakage area so mercury-containing powder is not tracked into other areas. Mercury may be bound to the broken glass and powder.

5.3.3 Air out the area for 15 minutes by opening a door or window to an outside area. Keep well ventilated. This allows mercury vapors to dissipate.

5.3.4 Assemble necessary supplies: latex gloves, tweezers, tape, index cards/ cardboard, damp paper towels, and a plastic container.

5.3.5 Wearing the gloves, carefully pick up any broken glass and place in puncture resistant container. Tweezers can be used to safely pick up broken glass. Tape can be used to pick up small pieces of glass and powder residue left on spill surface.

5.3.6 Use two pieces of cardboard to push together remaining powder and fragments of glass. Finish cleanup by wiping with damp paper towels.

5.3.7 Important: **Do Not Vacuum!!** Mercury residue in the vacuum is heated up and can vaporize when the vacuum is used again.

5.3.8 After clean-up is complete, place contaminated clean-up equipment along with any other materials that came in contact with the mercury powder into the puncture resistant container.

5.3.9 Label all containers “Hazardous Waste - Contains Mercury.”

5.3.10 Store container(s) on a corrosion-proof surface, inside a structure that is protected from the weather.

5.3.11 Complete an AVCOE Form 2758 for turn-in as described in the Fort Rucker HWMP and dispose as a hazardous waste under waste profile W31BMV0001.

5.3.12 Contact Travis Farmer at 334-255-0487 for more information.

Spills of one pound (34 ml or approximately two tablespoons) or more are to be reported to DPW-ENRD at 334-255-0487 or 334-255-1656 immediately.

6.0 FORMS AND RECORDS

AVCOE Form 2758, *Containerized Waste Turn-In Form*

7.0 REFERENCES

Hazardous Waste Management Plan (HWMP)
ENV-P002: Document Control
ENV-SW001: Waste Turn-In Procedure