

Environmental Management Procedure (EMP) 4.4.6.8.4 Tab 1

Subject: HWAF UW Lamp Processing

1. Purpose: This EMP establishes the procedures for the turn in and processing of Universal Waste (UW) Lamps.
2. Document Control: This is a controlled document. Controlled documents are updated as required, reviewed at least annually, and re-dated if changed. Any documents to include blank forms appearing in paper form are not controlled and should be checked against the file version prior to use on the:

JBLE – Eustis Environmental website: <http://www.jble.af.mil/Units/Army/Eustis-Enviromental/>

3. References:
 - A. JBLE-I 32-101, Environmental Management
 - B. EMP Dictionary
4. Scope: This EMP applies to all Activities and personnel, including military, civilians, vendors, suppliers, and contractor personnel who enter JBLE-Eustis. The definition of an Activity can be found in JBLE I 32-101.
5. Roles and Responsibilities:
 - A. Civil Engineer Directorate (CED); Environmental (CEIE):
 - (1). Manage the Installation's HWAF.
 - (2). Provide for UW lamp/bulb processing in accordance with VDEQ state regulation [9 VAC 20-60-273](#) .
6. Procedures:
 - A. Activities will containerize and provide their own transport of UW lamps to the HWAF. They will schedule all turn-ins with the HWAF. Upon arrival they are to check in with the HWAF Staff, fill out the sign in. **To re-emphasize, all Activity lamps shall be appropriately containerized. If the lamps are not properly containerized, the AEC will be contacted.**
 - B. The HWAF staff will dispose of all fluorescent bulbs in the Model 55 VRSU Premium Bulb Crusher device or ship uncrushed lamps for proper disposal.
 - C. The contractor must use a mercury-containing lamp crusher indoors with air pollution controls that capture both particulate and vapor phase mercury. At a minimum, these controls must include, or must be equivalent to the protection provided by a HEPA filter, activated charcoal, and a negative air flow (vacuum) through the crusher unit.
 - D. The contractor will follow a written procedure specifying how to safely crush universal waste lamps. This procedure must include: type of equipment to be used to crush the lamps safely, operation and maintenance of the unit in accordance with written procedures developed by the manufacturer of the equipment, and proper waste management practices. The handler must document maintenance activities (log) and keep records of maintenance. In addition, the unit operator must receive training in crushing procedures, waste handling and emergency procedures (training must be documented in the maintenance log).
 - E. Residues filter media, or other solid waste generated as part of the crushing operation, which are not being reclaimed and which exhibit any characteristics of a hazardous waste, must be managed in accordance with all applicable hazardous waste management requirements. The handler must ensure that spills of the

contents of the universal waste lamps that may occur during crushing operations are cleaned up in accordance with 40 CFR 273.13 (d)(2) or 40 CFR 273.33 (d) (2).

- F. The contractor must store the crushed lamps in closed, nonleaking drums or containers that are in good condition. Transfer of the crushed lamps to other drums or containers is not permitted. Drums or containers used for storage of crushed lamps must be properly sealed and labeled. The label shall bear the words "Universal Waste-Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)."