



Audit Checklist - Fluorescent Lamps

Environmental audit checklists are designed to assist businesses by providing a low cost way of reviewing compliance with Minnesota's environmental laws and rules. Because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to your legal obligations. You may have obligations that are not covered on this checklist. If you have questions regarding the Environmental Audit Program or this checklist, please call the Small Business Environmental Assistance Program (SBEAP) at 651-282-6143 or 800-657-3938.

Date of audit _____

Company _____

Completed by/Title _____

Environmental Audit Program Participation

A check mark in any of the boxes indicating that a requirement is not being met designates a violation of one or more regulations. To participate in the Environmental Audit Program, submit a report of your findings to the Minnesota Pollution Control Agency (MPCA). The Report Inventory form lists items that need to be included in the report and meets the audit report requirements. You do not need to submit a copy of this checklist.

Answer each question unless specifically directed otherwise.

Fluorescent lamps and high-intensity discharge (HID) lamps contain mercury. These lamps are banned from solid waste disposal in Minnesota.

1. Does your business use fluorescent or HID lamps?

- ☐ Yes You need to complete this checklist. Call SBEAP to request Hazardous Waste fact sheet #4.20, *Managing Used Fluorescent Lamps, High-Intensity Discharge Lamps and PCB Ballasts*, or find it at:
<http://www.pca.state.mn.us/waste/pubs/4-20.pdf>.
- ☐ No You do not need to complete this checklist.

Lamp Handling and Storage

2. Do you do any of the following?

- Place used lamps in the trash.
 - Break or crush lamps.
- ☐ Yes Stop these practices immediately.
- ☐ No Continue these practices.

3. Do you use a portable barrel top crusher on used lamps?

- ☐ Yes We strongly recommend that you stop this practice. There is a potential for mercury release; and because some crushing processes are considered a form of treatment, a hazardous waste treatment permit could be required. This permitting process is extremely burdensome for most automotive body shops, garages, and dealerships and should be avoided.
- ☐ No Continue these practices.

4. Do you store the lamps yourself?

- ☐ Yes
- Pack them carefully.
 - Do not tape them together.
 - Mark the storage area (or containers) "Hazardous Waste - Used Lamps."
 - Store any broken lamps in a **closed** container marked "Broken Fluorescent Lamps," and either send them to a recycling facility or manage them according to hazardous waste rules. If you manage them as a hazardous waste, you also need to complete the *Vehicle Maintenance Providers: Audit Checklists - Hazardous Waste*.
- ☐ No Continue on to the next question.

Collection Sites

5. Do you ship the lamps to a collection site?

- ☐ Yes
- Call the collection site to find out who will be transporting your lamps and to which recycling facility they will take them.
 - Call the facility to make sure the transporter has a contract with that recycling facility.
 - Prepare the lamps for transportation to the collection site by packing the lamps carefully.
- ☐ No Continue on to the next question.

6. Do you store lamps for other businesses?

- ☐ Yes
- If you store fewer than 1,000 lamps for other businesses, you need to contact SBEAP for a *Notification of Lamp Activity form*, or find it at <http://www.pca.state.mn.us/publications/w-hw7-20.pdf>. Provide the name and location of your collection site, and indicate the type of lamp handling activity you perform.
 - If you want to store more than 1,000 lamps from other businesses, you need to:
 - Obtain a written agreement with a lamp recycling facility certifying that the facility will accept lamps from you, and the rate at which the facility will accept lamps from you.
 - Enter into a storage compliance agreement with the MPCA.
- ☐ No Continue on to the next question.

Ballast Storage

7. Do you have used ballasts from fluorescent lamps?

- ☐ Yes Continue on to the next question.
- ☐ No **Skip to question 11.**

8. Are the ballasts marked indicating they *do not* contain PCBs?

- ☐ Yes Ballasts that do not contain PCBs may be managed as an industrial solid waste or recycled.
- ☐ No If they are not marked, assume they contain PCBs and recycle them.

9. If you have non-leaking ballasts that are not marked indicating they contain no PCBs, do you:

- Store these ballasts in a container that will hold the waste at all times:
 - For on-site storage, you can place a small number of ballasts in small closed containers such as coffee cans or ice cream pails with tight fitting covers.
 - For shipping, place the ballasts in Minnesota Department of Transportation (MNDOT)-approved containers.
 - Mark the storage and shipping containers with the words "PCB Ballasts for Recycling" or "Hazardous Waste PCB Ballasts."
 - Check the storage area regularly for leaking ballasts and containers, and repackage and manage them according to the guidance that follows in question 10.
 - Ship this waste off site within 180 days of accumulating 1100 pounds (500 kilograms).
- ☐ Yes You meet these requirements.
- ☐ No Begin these practices.

10. If you have leaking ballasts that are not marked indicating they contain no PCBs, do you:

- Wear protective clothing - goggles, gloves, apron (and boots if needed) made from neoprene, butyl or nitrile, and a chemical cartridge respirator with an organic vapor cartridge?
 - Clean all nonabsorbent surfaces?
 - Remove spilled PCB oil with a rag, paper towel, or by scraping with a putty knife.
 - Wipe twice with a rag containing mineral spirits, kerosene, turpentine, or rubbing alcohol.
 - Wipe once with a full-strength solution of a trisodium phosphate-based cleaner such as Soilex™ or Spic'n Span™.
 - Wrap all PCB-contaminated materials (the leaking ballasts, rags, gloves, absorbent materials like carpet) in newspaper? Place in double plastic bags.
 - Store in MNDOT-approved containers?
 - Label as PCB-contaminated hazardous waste, using a six-inch yellow PCB label, and ship via hazardous waste transporter to a hazardous waste facility within one year?
 - Notify the National Response Center at 800-424-8802 if one pound or more of PCBs (the amount in 12-16 ballasts) is released within 24 hours?
- ☐ Yes You meet these requirements.
- ☐ No Begin these practices.

11. Do you transport lamps or ballasts to a Minnesota recycling facility or to a collection site?

- ☐ Yes
- Consider coordinating storage and transportation of lamps with businesses in the area to reduce the pickup charge.
 - Transport the waste in your business vehicle. Follow MNDOT hazardous materials requirements (MNDOT-approved shipping container, completed pre-transport label on the container).
- ☐ No **Skip to question 13.**

12. When shipping within Minnesota, do you use a waste-tracking invoice containing:

- Date of shipment?
 - Location from which the waste was shipped?
 - Destination location?
- ☐ Yes Continue these practices.
- ☐ No Begin these practices.

13. Do you ship out of Minnesota to a hazardous waste disposal facility?

- ☐ Yes Use a hazardous waste manifest and a licensed hazardous waste transporter.
- ☐ No If you ship to a recycling or storage facility, and the lamps/ballasts do not pass through a state that requires a manifest, you may use a waste-tracking invoice. Follow the guidance outlined in question 12.

Lamp/Ballast Record Keeping Requirements

14. Do you retain these records for at least three years? (For protection from future liabilities, we recommend that you never discard these records.)

- The number of lamps removed from service during each calendar year.
- The waste tracking invoices or manifests for ballasts and lamps.
- The storage location of the lamps, if stored off site.

- ☐ Yes You meet these requirements.
- ☐ No Begin these practices.

Hint: *Have your shop lighting evaluated by your local utility provider. With advances in technology and by using new bulbs and electronic ballasts, your investment will pay off in smaller electric bills and a brighter shop workplace.*

Contacts

MPCA Web site <http://www.pca.state.mn.us>

Small Business Environmental Assistance Program (SBEAP) 651-282-6143
800-657-3938
http://www.pca.state.mn.us/programs/sbap_p.html

Customer Assistance Center 651-282-6143
<http://www.mntap.umn.edu> 800-657-3938

Metropolitan Counties Hazardous Waste Staff

Anoka County 763-422-7093
<http://www.co.anoka.mn.us>

Carver County 952-361-1800
<http://www.co.carver.mn.us>

Dakota County 952-891-7557
<http://www.co.dakota.mn.us>

Hennepin County 612-348-3777
<http://www.hennepin.us>

Ramsey County 651-266-2400
<http://www.co.ramsey.mn.us>

Scott County 952-496-8475
<http://www.co.scott.mn.us>

Washington County 651-430-6655
<http://www.co.washington.mn.us>