

**NEW YORK CITY DEPARTMENT OF EDUCATION
DIVISION OF SCHOOL FACILITIES
OFFICE OF BUILDING SERVICES**

November 2, 2006

OFFICE OF BUILDING SERVICES CIRCULAR NO. 3 – 2006/07

NOTE: All Circulars are to be kept in a permanent file

TO ALL CUSTODIAN ENGINEERS AND BUILDING MANAGERS

1. LIGHT BULB RECYCLING PROGRAM

This circular is a follow-up to the Interim Light Bulb Disposal and Recycling Procedures letter issued to you on June 1, 2006. For your reference, a copy of that letter is attached to this circular.

As you are aware, New York State and Federal Laws prohibit the disposal of certain types of light bulbs through the general waste stream. Specifically, all fluorescent tube lamps (including “Green Tips“, compacts, and circlelines), high intensity discharge (HID), neon, mercury vapor, high pressure sodium and metal halide type bulbs, can no longer be discarded along with conventional waste. Standard incandescent type light bulbs are excluded from the law and are to continue to be discarded with the regular building trash.

To ensure compliance with the bulb recycling laws, the Department of Education has partnered up with a company called Northeast Lamp Recycling, Inc. (NLR). NLR is a fully permitted lamp recycler. Under the agreement, NLR is responsible for the initial distribution of specially designed fiber drums to individual buildings, the removal and transportation of the filled drums from a centralized DOE location and the removal of contaminants from the bulbs at their recycling facility.

Fiber Drum Containers

NLR has already delivered fiber drums to all buildings. These drums are to be utilized for the storage and safe transportation of all recycled bulbs. It is important that you select the proper drum for the type/size bulbs being disposed. There is an 8’ drum to accommodate 8’ fluorescent bulbs and a 4’ drum to accommodate 4’ fluorescent bulbs. There is also a Rocon drum to accommodate any non-linear type bulbs such as HID, U-Type fluorescents, circlelines and other compact types containing heavy metals. The type/size of the drums you initially received was based on the specific bulbs utilized in your building as indicated in your response to a prior survey. Note: For disposal purposes you may combine T-8 and T-12 type bulbs in the same fiber drum as long as the bulb lengths match the container. Do not place any other type of material in these drums as this program is specifically designed for the recycling of light bulbs as described above.

Fiber Drum Tracking Labels

In addition to the fiber drums, each building received a packet of twenty (20) NLR tracking labels. These labels contain specific building information which includes the building ID and address. Each label is bar coded and also contains a pre-printed five digit Service Order No. which is unique to each label. This information will ensure that individual drums can be properly tracked as required under New York State Law. Extra labels are to be secured in the Custodian Engineer’s/Building Manager’s (CE’s/BM’s) office for future usage. In the event you deplete your inventory of labels, you are to contact NLR directly at (888) 657-5267 and request additional tracking labels. NLR will prepare and mail them directly to your building.

All fiber drums must be labeled when received at the building. There is a section on the tracking label where the date is to be entered when the first discarded bulb is placed in the fiber drum. This procedure is required by law to prevent storing bulbs beyond 1 year at any location.

Fiber Drum Storage

All fiber drums, regardless if they are empty or filled must be stored on site, in a secure location. The entry door to this area must be labeled “Universal Waste/Fluorescent Lamp Storage”. For your convenience a copy of the door signage is attached to this document. Please print and post it accordingly.

Fiber Drum Pickup Procedures

As fiber drums are filled, or are within two months of the one year storage limitation period, CE’s/BM’s will initiate the following procedures to arrange for pickup through our Trucking Department. A work request is to be generated by the CE/BM to his/her DFM. For tracking purposes, in the short description field, please indicate your geographic district, your building ID and the phrase “Bulb Recycling Program”. As an example, K001 would provide the following information in the short description field; 15K001/Bulb Recycling Program. In addition, on the work request you are to indicate Trade Code 44 (Trucking) and include Job Type “BP” (Bulb Program)

OFFICE OF BUILDING SERVICES CIRCULAR NO. 3 – 2006/07

In the instruction field you are to indicate specifically each type/size of filled drum to be removed and replaced with an empty one. You must also include the unique five digit Service Order No. as it appears on the tracking label for each particular drum. Information pertaining to each drum must be entered on a separate line.

Example: (First line) 1-four foot fiber drum, Service Order No. 12345 to be picked up and replaced
(Next line) 1-four foot fiber drum, Service Order No. 67890 to be picked up and replaced
(Next line) 1-eight foot fiber drum, Service Order No. 24680 to be picked up and replaced
(Next line) 1-Rocon fiber drum, Service Order No. 13579 to be picked up and replaced

All drums ready for pick up must be labeled and have their lids properly in place. Do not use tape to seal drums.

Corrugated Box Pickup Procedures

As a result of the letter sent to CE's and BM's on June 1, 2006, many buildings may also have stored used or unwanted bulbs in manufacturer's corrugated boxes that will also need to be picked up and recycled. In these instances, CE's and BM's are to affix a tracking label to each box and include the following information in the instruction field of the work request. It must be clearly indicated that these are corrugated boxes and not fiber drums. You are to indicate the number of filled corrugated boxes that need to be picked up and must include the Service Order No. as it appears on the tracking label. Each box is to be listed on a separate line.

Example: (First Line) 1-corrugated box with Service Order No. 12345 to be picked up
(Next Line) 1-corrugated box with Service Order No. 67890 to be picked up

Note: There is no need to include the type/size of these boxes as they will not be replaced. As previously explained, all corrugated boxes must meet the following criteria before they can be removed from your location.

- Box/container must indicate the date that the first bulb was placed in it.
- Box/container must be marked with the words "Universal Waste Lamps."
- Box/container must include an NLR tracking label. (This is the same label you would use for a fiber drum.)
- Ensure that the box/container is properly closed and does not have any rips, tears, or other openings.

Because corrugated boxes were provided as an interim alternative to fiber drums, going forward, only fiber drums are to be utilized to store used or unwanted bulbs under this recycling program. If you have both corrugated box/containers and fiber drums that are full and ready for pickup, you are to place both types on the same work request. To complete this request, you are to follow the fiber drum and corrugated box pickup procedures indicated above.

Requesting Additional Drums

In those instances where the CE/BM determines the need for additional fiber drums, the CE/BM is to submit a work request to their DFM for approval. In the instruction field include a description of the type, size and quantity of fiber drums required. You must also include the phrase "Additional Fiber Drum Request / Only drop-off empty drum(s). No full drums to be picked up."

Bulb Breakage

As previously explained, in the event of accidental bulb breakage, be sure to wear protective gloves and goggles, and immediately remove the broken bulb particles using a damp cloth. All generated bulb debris is to be discarded in a bulb fiber drum.

Training on Bulb Handling Procedures

All CE's/BM's should have already received training in bulb handling procedures by their Deputy Facilities Managers (DFM's). Any CE/BM not yet trained is to coordinate training with their DFM. All custodial employees should have received training by their respective CE/BM. If you have not already done so, you are to train your staff immediately. Documentation substantiating training must be kept on file for all trained individuals.

Certificate of Recycling

A Certificate of Recycling confirming that bulbs were properly discarded will be issued by NLR for each drum. These certificates will be kept centrally at the Division of School Facilities headquarters. Advise your DFM if said certificates are requested during a field inspection by an outside monitoring agency.

If you have any questions or concerns regarding this program, please contact your DFM.

James F. Lonergan
Executive Director
Office of Building Services



THE NEW YORK CITY DEPARTMENT OF EDUCATION

JOEL I. KLEIN, *Chancellor*

DIVISION OF SCHOOL FACILITIES

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Date: June 1, 2006

To: All Custodial Engineers and Building Managers

From: John O'Connell, Director of Field Operations

Subject: Interim Light Bulb Disposal and Recycling Procedures

In an effort to further re-enforce previously disseminated information pertaining to light bulb disposal and recycling procedures, the following information is being provided.

New York State and federal laws prohibit the disposal of certain light bulbs through the general waste stream by City agencies. These light bulbs include any fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide bulbs. In order to ensure compliance with these laws, all Custodian Engineers and Building Managers must instruct their staff to refrain from discarding any used or unwanted fluorescent light bulbs with the regular trash. Said bulbs are to instead be stored onsite, in a secure area, in the manufacturer's box supplied with the bulbs, or within any other suitable leak proof container that will prevent disbursement of bulb particles in the event of breakage. In addition, Custodian Engineers and Building Managers must comply with the following storage requirements:

- Label the box/container with the date that the first light bulb was placed within it.
- Label the box/container with the words "Universal Waste Lamps."
- Ensure that the box/container remains closed and does not have any rips, tears, or other openings.

Special fiber drum containers specifically designed for light bulb storage are currently being delivered to all New York City schools, with all deliveries to be complete by the summer of 2006. If your school has already received the fiber drum container, store the described unused or unwanted bulbs in it immediately following the storage requirements defined above and await further instructions from this office.

In the event of accidental breakage, wear protective gloves and immediately clean the broken bulb particles using a damp cloth. All generated bulb debris is to be discarded in the box/container described above.

Be advised that the Division of School Facilities will be following up in the near future with a circular detailing specific procedures for storage, disposal and recycling of the light bulbs referenced in this directive.

Your Deputy Facilities Manager (DFM) will soon be meeting with you to provide general training on the handling and safe disposal methods of these bulbs. In the interim, any immediate concerns regarding this program should be brought to the attention of your DFM.

Thank you for your cooperation in this important matter.

Cc: James F. Lonergan
Salvatore Calderone
Michael Hahn

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