

**From:** [Hernandez, Ileana](#)  
**To:** [Ken Dean](#)  
**Cc:** [Kennedy, Shannon](#)  
**Subject:** RE: Broken Fluorescent Bulbs  
**Date:** Tuesday, February 25, 2020 11:18:00 AM  
**Attachments:** [image005.png](#)

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Good afternoon Ken,

First, I do apologize for the late response. Great question! After further discussing this with other Districts and with the EPA, we concluded that **broken fluorescent bulbs may be managed as universal waste** in accordance with Chapter 62-737, F.A.C. Please note that the universal waste definition does **not** apply to cleanup residues on clean-up equipment (e.g. gloves, tape, bags, etc.) and contaminated soils resulting from the release of the lamp's components should the handler or transporter determined this to be hazardous waste and manage it in accordance with Chapter 62-730, F.A.C.

Rule 62-737.400(5)(a), F.A.C., states: *Fragile universal waste devices, universal waste lamps crushed per paragraph (6)(b), below, and lamps or devices showing evidence of leakage, spillage, or damage that could cause leakage, shall be placed in closed containers that are structurally sound; compatible with the universal waste lamp or device; and that lack evidence of leakage, spillage or damage that could allow leakage.*

Rule 62-737.400(5), F.A.C., states: *Handlers and transporters shall manage universal waste lamps and devices in a way that prevents breakage, releases of their components to the environment, and their exposure to moisture. In the event of a release, the handler or transporter must determine whether the cleanup residues (e.g., cleanup equipment and contaminated soils) resulting from the release are hazardous waste, and if so, must manage them in accordance with Chapter 62-730, F.A.C.*

I've included EPA's interpretation for your reference:

- EPA FAQ – <https://waste.zendesk.com/hc/en-us/articles/212350287>

Sincerely,



**Ileana Hernandez**  
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**From:** Ken Dean <Ken.Dean@usecology.com>  
**Sent:** Thursday, February 06, 2020 11:44 AM  
**To:** Hernandez, Ileana <Ileana.Hernandez@FloridaDEP.gov>  
**Subject:** Broken Fluorescent Bulbs

Good morning Ileana,

Hope all is well. I have a quick question. I have been getting inquiries about broken fluorescent bulbs and if they can be managed as universal waste in Florida. Scenario is that a generator breaks a bulb and containerizes the material can they manage as universal waste or must they fully characterize and manage as hazardous waste? Please let me know if you have any questions.

Thank you,

**Ken Dean**

EHS Compliance Specialist

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