



OFFICE OF ENVIRONMENTAL COMPLIANCE
James K. Polk Building
505 Deaderick Street
Nashville TN 37243

MEMORANDUM

TO: TDOT Garage Facilities

FROM: Ronnie Bowers Brian Gant Jim Claunch
ENV COMP DIR ENV COMP SPEC ENV COMP COOR

DATE: June 16,2003

REF: **Universal Waste – Lamps/Bulbs/Florescent Tubes**

The recent environmental walk-downs by SAIC indicate that all the garage facilities are continuing to improve overall in dealing with garage waste and the required record keeping. The one issue that continues to come up is the timely disposal of Universal Waste (lamps/bulbs/florescent tubes). The TDEC storage area requirement is: Time limit of 1-year from the date the first lamp/bulb/florescent tube was placed in the container. **This is the only garage waste that must be disposed of within a 1-year time period.** Some garages are waiting until the container is completely full before disposing of the waste. By this time, the container holds waste that exceeds the TDEC accumulation limit of 1-year. At the time of inspection six TDOT garages across the State were in violation of this requirement.

This issue must be addressed by scheduling a “milk run” twice a year to all the County and District facilities to pickup their Universal Waste and bring this waste to the Region’s 90-day accumulation area. The first pickup should be completed by the end of June. The Regional Environmental Section will send a shipping inventory to Brian Gant every 6 months. Each Region will then, in turn contact the contracted recycle vendor Southeast Recycling Technologies, Inc. 1-800-592-3970 for pick-up. Statewide contract #436.