



7 STEPS TO STARTING A FLUORESCENT LAMP COLLECTION PROGRAM

Why should my store provide a fluorescent lamp collection and recycling service?

Fluorescent lamps, including the newly-popular compact fluorescent lamps (CFLs), work using a small amount of mercury. Because mercury is a potent neurotoxin, recycling of these lamps is encouraged by the Environmental Protection Agency and required in some states and counties. Returning used lamps to a local retailer is a convenient way for consumers to recycle and keeps mercury out of our landfills and incinerators.

More and more retailers around the country are starting to provide their customers with fluorescent lamp recycling services because it is the “right thing to do” and provides the following benefits:

- Increased foot traffic by providing yet another reason for a customer to visit the store. (While retailers have not collected hard data on this, many cite this anecdotally.)
- Generate positive attention in local media and enhance the community or environmental image of the store.
- Help your customers to “be green” by giving them a chance to take action for the environment.
- Promote the sale of energy efficient fluorescent lighting by alleviating customer concerns about mercury content and disposal.
- While there are new procedures to learn and information to share, recycling programs are simple to implement and provide an added service without detracting from the mission of the store.

Okay, I'd like to provide a fluorescent lamp recycling service to my customers to help keep mercury out of the environment. What should I do?

1. Decide what types of lamps you want to collect and who you want to serve.

- What kind of lamps do you sell? Consumers use many types of fluorescent lamps, including CFLs, linear tubes, round, and U-shaped lamps. You may want to collect the same kind of lamps you sell.
- Linear tubes contain more mercury than CFLs and thus their collection provides a greater environmental benefit, but you need to have room to store whatever size tubes you decide to collect.
- Many boxes used for collecting CFLs can also hold 2-ft. linear tubes and round or U-shaped lamps as well.
- Who are you providing this service for? If you are concerned about getting too many lamps brought in at once from a business, make any limitations clear in your promotional materials. Some retailers ask that no more than 7 lamps be dropped off at a time, for example, or advertise it as being for residential users only.

I plan to collect: _____ CFLs _____ Linear tubes up to _____ feet
_____ Round or U-shaped fluorescent lamps _____ # of lamps per customer visit

2. Decide how you will pay for the program.

The cost of the program depends on how many lamps you collect, what type, and what recycling system you use (see #3, below). There are several options for funding collection programs:

- Cover the full cost of collection and offer the service free-of-charge to your customers.
- Charge your customers a small fee for recycling to cover or defray costs associated with the collection effort.
- Negotiate an agreement for cost sharing with suppliers and/or manufacturers.
- Ask your state or local environmental agency if they have suggestions.
- Find an outside funding source, such as a utility or energy efficiency group that wants to support recycling as part of their effort to promote fluorescent lamps. Retailers interested in creating a partnership with utilities should call their state or local utility provider.

3. Choose a recycler and decide what kind of recycling system to use.

- Find a place off the store floor to locate the collection box(es). Employees should gently place the bulbs in the boxes for customers -- do not put the box on the store floor where the public can access it.
- See the three choices you have for collection programs in “Types of Collection Programs” on Page 4.
- To find a nearby recycler, or a list of companies offering mail back and/or reverse distribution collection services, visit www.almr.org or www.lamprecycling.org. Prices may vary, so it is wise to do some cost comparisons before selecting a recycler.
- Make sure to select a recycling facility that recycles waste in accordance with federal and state regulations and to follow federal transportation requirements for shipping. The recycler should provide you with documentation showing that the lamps from your store have been recycled.

Recycler Name: _____

Recycler Phone Number: _____

Notes:

4. Consider liability.

- Legal liability may be an issue of potential concern to retailers participating in collection and/or recycling activities in states where retailers are frequently sued by private attorneys. You may decide to address the need for increased liability coverage to cover the cost of potential actions by employees or customers alleging they were harmed by exposure to mercury released during product breakage incidents.
- Remember that the products being returned are probably sold and used in your store already! PSI is not aware to date of any cases where a retailer has been sued because of any incident related to collecting lamps.

5. Educate your employees.

- Educate employees about the program during staff meetings, signage in employees-only areas (such as a break room, for example), and the employee manual.

- Be sure all employees know where to put bulbs brought in by customers, that they should not accept broken bulbs, that bulbs should be handled gently, and what kind are accepted.
- Remind them to promote the program to customers purchasing lighting supplies.
- Post the EPA’s guidelines for cleaning up broken bulbs on or near your collection bin. Make sure employees are aware of the guidelines and where they are posted. For a copy of the guidelines, visit <http://www.epa.gov/mercury/spills/index.htm>. You will need to have the necessary clean-up materials on hand (stiff paper or cardboard to clean up broken materials, glass jar with metal top to contain cleaned-up materials, and damp paper towels).

6. Call your local or state environmental agency.

- Call your local state or environmental agency to let them know you are providing this service and ask the following questions. You can find a list of state agency contacts on the EPA’s website at: <http://www.epa.gov/epahome/state.htm>.
 - “Are there any regulations I should know about that relate to my lamp recycling project?” Regulations vary state-by-state, but generally require that you: (1) label the container that lamps are being stored in and keep it closed, (2) store broken bulbs separately, and (3) do not store lamps for more than a year before sending them to the recycler.
 - “Can you list my store on your website or other materials as a recycling location for consumers?”
 - “Do you have suggestions for potential funding to cover or offset my costs associated with this program?”

7. Promote your program.

- Information about the recycling opportunity can be included in newspaper ads or inserts, store signage, and radio or television commercials.
- Include the recycling service in sales promotions for CFLs.
- Partner with a local utility or local government agency promoting efficient lighting.
- Always include information on what types of lamps you collect, and whether or not there is any limit to the number that a customer can bring in at one time.
- Your store can be listed as a collection site on Earth911.com. Contact them directly through their website or email them at clientrelations@earth911.com if you have any questions.

This document is based on a pilot retail collection project conducted at Ace stores in Utah, Montana, and South Dakota in partnership with PSI (www.productstewardship.us) and Women’s Voices for the Earth (www.womenandenvironment.org), interviews conducted with retailers collecting fluorescent lamps Washington (listed below); and PSI’s eight years of experience working with retailers on product take-back. Funding for these initiatives was provided by U.S. Environmental Protection Agency Region 8 and the Florida Department of Environmental Protection.

*Ace Hardware (ME, CO)
Aubuchon Hardware (ME)
True Value Hardware (ME)
K-Mart (ME)*

*Long’s Drugs (CA)
Smart & Final (CA)
Best Buy (CA)*

*Ralph’s Grocery (CA)
Vons Grocery (CA)
Dollar Tree (CA)*

*Bartell Drugs (WA)
Seattle Lighting (WA)
Home Concepts (WI)*

Types of Collection Programs

Reverse Distribution

In a reverse distribution system, lamps are collected by retailers, consolidated at a distribution warehouse, and then transferred to a recycling facility (see list of recycling facilities, below).

Pros: If enough stores collecting lamps use the same distribution center, reverse distribution will likely be the most cost-effective option because the recycler will receive a large quantity of consolidated materials at one time. Also, transportation costs may be reduced if the truck delivering goods to the retailer has space on the return to “back haul” the collected lamps to the distribution center, eliminating the need for an extra trip.

Cons: If only a small number of stores are involved, reverse distribution is not efficient since it requires coordination among retailers, haulers, distribution centers, and recyclers. Retailers must arrange for pick-up, haulers must anticipate when back hauling will make transportation economical, and distribution centers must have room to store and consolidate spent lamps. Distribution centers must also arrange for transporting lamps to the recycler, package lamps appropriately, and ship lamps on pallets compliant with Department of Transportation regulations.

Costs: Please contact a local recycler for cost information. Costs and system specifics (such as how bulbs are packaged) vary widely.

Direct Shipping

In a direct shipping system, retailers collect fluorescent lamps using collection bins provided by a recycling facility or contractor. When a bin reaches capacity, the retailer ships the bin using a pre-paid shipping label provided by the recycling contractor. More than one collection bin is useful so that at least one bin is available for bulb collection while the is being shipped to the recycler.

Pros: For individual stores, this option is likely to be more cost effective than reverse distribution and requires fewer logistical efforts.

Cons: For a group of stores sharing a distribution center this option is more expensive because mail-back programs usually cost more per lamp compared to bulk recycling using the reverse distribution method.

Costs: Costs vary depending on the direct shipping service used. The cost ranges shown here are from national service providers; other prices may be negotiated.

- CFLs: Costs range from \$60 (90 CFLs) to \$139 (250 CFLs) for CFL collection bins. Costs include shipping and handling. The larger CFL containers may also be used for round, U-shaped, or 2-ft. linear fluorescent tubes, though this reduces the total number of lamps the box can hold.
- Linear Fluorescents: \$60.00 for a box holding 30 4-ft. linear tubes to upwards of \$100.00 for a box holding 70+ 4-ft. linear tubes. Costs include shipping and handling.

Contract with Recycler

There may be a recycler in your area that you could contract with to pick up and recycle the lamps from the stores directly. This is likely to be less expensive than the direct shipping option, and does not require the involvement of distribution centers needed in the reverse distribution model.