



ENVIRONMENTAL QUALITY

WASTE MANAGEMENT & RADIATION CONTROL

Overview

- Defining electronic waste
 - Cathode Ray Tubes (CRTs)
 - * Flat-screen monitors
 - * Keyboards
 - * Servers
 - * PLC boards
 - * Laptops & tablets
 - Desktop computers
 - * Cell phones
- Review of key terms for recycling
 - Speculative Accumulation
 - Scrap metal
 - The Solid Waste table



Speculative Accumulation

Materials are not solid waste if:

- Recycling must be feasible.
- > 75% of material stored at the beginning of the year must be recycled or sent for recycling by the end of the year.

If materials are speculatively accumulated, they are solid wastes.



Excluded Scrap Metal R315-261-4(a)(13)

- * Excluded Scrap metal: Excluded scrap metal is processed scrap metal, unprocessed home scrap metal, and unprocessed prompt scrap metal.
- * Baled, shredded, sheared, chopped, crushed, flattened, cut, melted, or separated by metal type.
- * Home and prompt are turnings, cuttings, punchings, and borings generated by steel mills, foundries, metal refineries, and metalworking/fabrication industries.



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Exempt Scrap Metal R315-261-6(a)(3)(ii)

Scrap metal that is not already excluded from the definition of solid waste is exempt from hazardous waste regulations if sent for recycling/reclamation



Solid Wastes

	Use constituting disposal (261-2(c)(1))	Energy Recovery/fuel (261-2(c)(2))	Reclamation (261- 2(c)(3)) except as provided in 261- 4(a)(17), 261-4(a)(23), 261-4(a)(24) or 261- 4(a)(27)	Speculative accumulation (R315- 261-2(c)(4))
Spent materials	SOLID WASTE	SOLID WASTE	SOLID WASTE	SOLID WASTE
Sludges (listed in R315- 261-31 or 261-32)	SOLID WASTE	SOLID WASTE	SOLID WASTE	SOLID WASTE
Sludges exhibiting a characteristic of hazardous waste	SOLID WASTE	SOLID WASTE	NOT SOLID WASTE	SOLID WASTE
By-products (listed on 261-31 & 261-32)	SOLID WASTE	SOLID WASTE	SOLID WASTE	SOLID WASTE
By-products exhibiting a characteristic of hazardous waste	SOLID WASTE	SOLID WASTE	NOT SOLID WASTE	SOLID WASTE
Commercial chemical products listed in 261-33	SOLID WASTE	SOLID WASTE	NOT SOLID WASTE	NOT SOLID WASTE
Scrap metal that is not excluded under 261-4(a)(13)	SOLID WASTE	SOLID WASTE	SOLID WASTE	SOLID WASTE

Used Cathode Ray Tubes (CRTs) R315-261-4(a)(22)

- Used, intact CRTs that are not disposed of or speculatively accumulated are not solid waste
- Used, intact CRTs that are exported for recycling are not solid waste provided they meet certain requirements; (see slide #8)
- * Used, broken CRTs and glass removed from CRTs are not solid waste provided that they meet certain storage, segregation, labeling and other requirements (see slide #9)



Used, Intact CRTs that are Exported R315-261-40

Used, intact CRTs exported for recycling are not solid wastes provided that:

- They are not speculatively accumulated
- The exporter notify EPA in writing 60 days before first shipment
 - Use EPA's Waste Import Export Tracking System (WIETS)
 - good for 12 months
 - Country receiving exports must consent
- * Exporter files annual report



Used, broken CRTs and glass removed from CRTs

Used, broken CRTs are not solid wastes if they meet the following conditions:

- * Storage
 - Stored in a building with a roof, floor, and walls, or
 - * Placed in a container, i.e., a package or a vehicle, that is constructed, filled, and closed to minimize releases to the environment of CRT glass, including fine solid materials.
- Container Labeling.
 - * "Used cathode ray tube(s)-contains leaded glass " or "Leaded glass from televisions or computers."
 - * "Do not mix with other glass materials."



For More Information on CRTs go to:

https://www.epa.gov/hw/cat hode-ray-tubes-crts-0



Circuit Boards

- Whole, unused circuit boards are off-specification commercial products and not solid waste if sent for recycling/reclamation (see Solid Waste table)
- * Whole, used circuit boards meet the definition of scrap metal and are exempt from RCRA hazardous waste rules under R315-261-6(a)(3)(ii) if recycled (see slide #5)
- * Used circuit boards and equipment containing used circuit boards are solid waste but are not hazardous waste if they are recycled.



Shredded Circuit Boards R315-261-4(a)(14)

Shredded circuit boards being recycled are not solid waste provided that they are:

- * Stored in containers sufficient to prevent a release to the environment prior to recovery; and
- * Free of mercury switches, mercury relays and nickel-cadmium batteries and lithium batteries.



In Summary

- Electronic waste containing circuit boards, if recycled and not shredded by the generator are not hazardous waste
 - no container or labeling standards, no emergency preparedness, no training, and no notification requirements apply
- * Intact CRTs that are sent for recycling are not solid waste and no requirements apply to the generator unless the generator exports the CRTs (see slide 8 if you export CRTs)
- Broken CRTs are subject to storage and labeling requirements (see slide 9)



Questions?

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