

EVALUATING COMPLIANCE OF PERMITTED FACILITIES

DISASSEMBLING USED ELECTRONICS



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OVERVIEW

□ PURPOSE & FINDINGS

- How are permitted facilities managing wastes?
- What did we learn?

□ ENFORCEMENT RESPONSE

- All sites inspected received citations
- 2 Formal actions in negotiations

□ COMMON VIOLATIONS

- Record keeping
- General mismanagement
- Unpermitted activities

FINDINGS



- ❑ Among the five facilities inspected, all were found to be in non-compliance with many of the conditions of the permit.
- ❑ One facility operating as a LQH w/out a General Permit for Disassembly of Used Electronics.
- ❑ Typical violations/issues found among the five inspected.

ENFORCEMENT RESPONSE



- All 5 facilities received NOV's
- 2 facilities currently receiving escalated enforcement actions for severe violations.

COMMON VIOLATIONS

- ❑ RECORD KEEPING ISSUES
- ❑ GENERAL MISMANAGEMENT OF FACILITY
- ❑ UNPERMITTED ACTIVITIES (SOLID WASTE TRANSFER STATION)

RECORD KEEPING VIOLATIONS

- ❑ Failure to demonstrate that inspections of disassembly areas had been performed
- ❑ Failure to measure and record the quantities of used electronics received/shipped
- ❑ Failure to demonstrate facility personnel had received appropriate training
- ❑ Facility Site Plans & descriptions were inaccurate, incomplete and/or were not revised/updated as needed



RECORD KEEPING VIOLATIONS (CON'T)

- Failure to demonstrate that copies of Emergency & Preparedness Plans had been sent to the local authorities.
- Closure Plans and Cost Estimates
 - Cost estimates insufficient
 - Underfunded or inadequate financial mechanisms



GENERAL MISMANAGEMENT



- ❑ No labeling of pallets, shelves, containers, or areas in which used electronics or other universal wastes are stored
- ❑ No dates of accumulation/storage beyond 1 year limit
- ❑ No adequate aisle space in disassembly area
- ❑ Commingling of wastes

UNPERMITTED ACTIVITIES

Operating a SW Transfer Station/SW Disposal Area
without a permit

- Collecting & stockpiling “white goods” and “anything with a plug” such as:
 - Air conditioners
 - Microwaves
 - Washing machines
 - Circular saws
 - Office furniture
 - Floor lamps
 - Refrigerators
 - Sewing machines







THANK YOU & QUESTIONS

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