Collection and Storage of Electronic Devices Under E-Cycle Wisconsin
Best Practices for Local Units of Government

Communities provide for the collection of many items from their residents ranging from trash and recycling to used oil and tires. With the passage of Wisconsin’s electronics recycling law, many are considering collecting or continuing to collect used electronics. The collection and handling of these items can pose some unique challenges. The following recommended management practices apply to the collection and storage of electronic scrap before shipment to recyclers under E-Cycle Wisconsin. Please note that these recommendations apply primarily to electronics collected from households under E-Cycle Wisconsin. The DNR is working on additional information about collecting electronics from schools and businesses.

In general, electronics collectors are conditionally exempt from Wisconsin Department of Natural Resources (DNR) hazardous waste management requirements or approvals if the collectors comply with the management practices listed below. However, collectors and recyclers who wish to participate in the E-Cycle Wisconsin program are required to register and report annually to the DNR.

Recommended practices:
- Ensure containers are closed, structurally sound and compatible with the contents.
- Label waste to clearly identify the type of waste.
  - Containers of broken or processed Cathode Ray Tube (CRT) glass should be labeled: “waste cathode ray tubes – contains leaded glass” or “used cathode ray tubes – contains leaded glass and do not mix with other glass materials.”
  - Containers of batteries, lamps and mercury containing devices should be labeled as “used-“, or “waste-“ batteries, lamps, mercury, etc., to clearly identify the type of waste.
- Document the length of time the waste has been accumulated on-site. Persons may store devices for up to one year for the purpose of accumulating quantities necessary to facilitate proper recycling, treatment or disposal.
- Train employees on proper handling and emergency procedures.
- Respond to spills and manage any resulting residues promptly and appropriately.
- Records demonstrating proper recycling are also recommended.
- If collecting devices under E-Cycle Wisconsin, the municipality must deliver devices to a recycler registered with E-Cycle Wisconsin.
- Store broken or processed CRTs in a building with a roof, floors, and walls, or in a container that is constructed and handled to minimize dust.
Health and Safety

Many electronic devices contain materials that may be hazardous. Therefore, managers of collection sites should have programs in place to ensure a safe work environment. In Wisconsin public employers are required to follow Wisconsin s.Comm 32, Wis. Adm. Code. The Wisconsin Dept. of Safety and Professional Services Public Sector Safety program (http://dps.wi.gov/sb/sb-publicsectorsafetyprogram.html) has information available that will enable you to create or update Safety Plans/Programs for your facility.

Transporting Electronic Waste

If your municipality is planning on transporting collected electronic devices, there may be U.S. Department of Transportation (DOT) rules that will need to be followed as some electronic waste may be classified as a hazardous material. Hazardous materials are substances or materials that the DOT has determined are capable of posing an unreasonable risk to health, safety and property when transported in commerce. Hazardous material, as defined in 49 CFR 171.8, is subject to the applicable Hazardous Materials Regulations (HMR) in 49 CFR Parts 171 to 180. These regulations apply to the classification, packaging, hazard communication, incident reporting, handling and transportation of hazardous materials.

The Bottom Line

Communities who decide to collect and store discarded electronics must do so in a manner that does not cause harm to human health or the environment. The practices described in this factsheet can be the framework of policies and procedures that will enable discarded electronics to be collected in a safe manner.

Additional resources available from the DNR:

E-Cycle Wisconsin (http://dnr.wi.gov/topic/Ecycle/)


Managing Used Computers: A Guide for Environmentally Sound Disposal, Publication # WA420

Management of Universal Wastes in Wisconsin, Publication #WA742

Tips for Hosting a Successful E-cycling Event (link: http://dnr.wi.gov/topic/Ecycle/event.html)

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