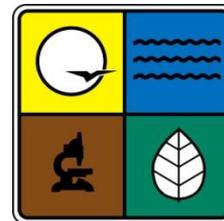


Electronics Scrap Management Rule

Tony Pierce

Hazardous Waste Program

Jan. 6, 2014



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Background

- Manufacturer Responsibility and Consumer Convenience Equipment Collection and Recovery Act, signed June 16, 2008 (260.1050 to 260.1101 RSMo)
- 1st and only statutes in Missouri specifically dealing with management of electronic waste
- Legislation was supported by environmental groups as well as industry and retailers (a unique situation).
- No funding available to administer the program

Covered equipment

- Desktop computers
- Laptop computers (including tablets)
- Computer monitors or other display devices that do not contain a tuner
- Keyboards
- Mice

Elements of the law

- Manufacturer responsibilities: Submit to MDNR a recovery plan which provides reasonably convenient recycling opportunities for their computers to consumers in Missouri at no cost
- Retailer responsibilities: cannot sell or offer to sell new covered equipment unless labeled, the manufacturer is on list, and is compliant
- Department responsibilities: adopt mandatory standards, consumer education, audits and inspections, enforcement, reporting, rules

Issues associated with managing e-scrap

- Safety in handling
- Conserving resources
- Using landfill space
- Costs/economics
- Speculative accumulation
- Illegal disposal
- Bad practices, e.g. exporting harm
- Disparity in services

Law was intended to avoid this



In the last year we found these



And this





Missouri Department of
Natural Resources



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Current regulations

- Final rule became effective April 30, 2010
- 10 Code of State Regulations 25-19.010 - Electronics Scrap Management
- Applies to computer equipment manufacturers, retailers, consumers and recyclers, and includes department responsibilities

Recovery plans

- Rule has procedures for manufacturers to submit and implement recovery plans and standards for recyclers that process equipment collected under recovery plans
- To date 42 manufacturers have submitted recovery plans representing 59 different brands
- Three recovery plans are currently being reviewed representing four different brands of tablets

Key points on current regulations

- Electronics waste is hazardous waste
 - Most equipment fails Toxicity Characteristic Leaching Procedure (TCLP) for heavy metals (lead, arsenic, cadmium, chromium, mercury, silver)
 - Exemptions may be permitted for recycling
 - CRT rule, scrap metal exemption and universal waste rules (for mercury-containing lamps and batteries)

More key points on current regulations

- Exemptions have specific requirements
 - Labeling, avoiding speculative accumulation, exports, etc.
- If the requirements are not met, the exemption may be lost

Questions?

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