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GUIDANCE DOCUMENT: NOTIFYING FOR AND HOSTING AN E-WASTE COLLECTION EVENT



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By hosting an electronic waste (e-waste) collection event on property that you occupy or sponsoring the event on other property, you may help prevent illegal disposal of e-waste by giving your community a convenient means of relinquishing unwanted electronics. As a host or sponsor, you need to be aware of the regulatory requirements involved with collecting e-waste. Electronic wastes are hazardous wastes that may only be managed as universal wastes when they are properly handled and destined for recycling.

Any owner or operator of a facility that accepts universal waste from someone else, accumulates the waste, and sends it to a recycler or other handler to be recycled is a universal waste handler (see California Code of Regulations, title 22, §66273.9 for the complete definition of a universal waste handler). Consequently, a collection event host and the event sponsor are **universal waste handlers**. A collector or recycler that assists the host or sponsor with the collection event may also be a handler. DTSC requires a notification and annual report for **ALL** e-waste collection events. This requirement is frequently overlooked by charity and fundraiser groups who host or sponsor an e-waste collection event.

This document will explain **how to notify and report for a collection event**, and provide guidance on **how to host an event**.

Handlers who conduct any type of e-waste treatment (which can be as simple as cutting power cords off monitors or as complex as shredding a laptop's circuit board) are subject to much more intensive requirements that are outside the scope of this guidance. See these documents for more information on e-waste treatment and recycling: http://www.dtsc.ca.gov/HazardousWaste/EWaste/upload/E-Waste_Q-A.pdf and <http://www.dtsc.ca.gov/HazardousWaste/EWaste/upload/E-Waste-8-Violations-Guidance.pdf>.

I. How to Notify and Report for a Collection Event

DTSC must receive a notification for a collection event site at least **thirty days** before the event is to take place. The notification may be filed one of two ways: either online at <http://www.dtsc.ca.gov/database/UWED/index.cfm> or by downloading, completing, and submitting the hard copy form located at http://www.dtsc.ca.gov/HazardousWaste/EWaste/upload/HWM_FRM_EWaste_1388.pdf

f. The notification requires basic information such as the event contact person and the type and source of electronic wastes expected. The requirements are listed in detail in California Code of Regulations, title 22, §66273.13(d)(2)(A), §66273.33(d)(2)(A), and §66273.82(a).

Who exactly files the notification? DTSC will accept a notification filed by the host, the sponsor, or any collector or recycler that assists the host or sponsor with the collection event. **The sponsor and the host should decide between themselves on who will notify DTSC.** It is not necessary for more than one of the handlers to notify. If DTSC does not receive the notification from one of the handlers, DTSC may cite any or all of them for non-compliance with the notification requirement.

Notifications never expire. Consider this example: if you host or sponsor a collection event at the same site in September of every year, and there are no changes to the business or other information listed on the notification, then the notification sent in the first year will cover the same site for the years to come, unless DTSC enacts regulations in the future stating that notifications have an expiration date or changing the required content of the notification.

The host or sponsor, or any assisting collector or recycler, must **also** file an annual report with DTSC by going to <http://www.dtsc.ca.gov/database/UWED/index.cfm> or by submitting a hard copy of the annual report. If DTSC does not receive the annual report, when due, DTSC may cite any or all of these handlers for non-compliance with the reporting requirement. Annual reporting requirements are listed in California Code of Regulations, title 22, §66273.13(d)(2)(B), §66273.33(d)(2)(B), and §66273.82(b)(2). The annual report requires submission of basic data such as shipping destinations and quantities collected.

A report covering the calendar year is due by February 1st of the next year. For example, the annual report for a collection event held any time in 2008 would be due by February 1, 2009. Remember, the annual report must include data for **any and all** collection events at a specific address during the calendar year. Make sure to list **the location of the event** as the facility address. If four collection events were held at four different addresses, then four annual reports must be submitted, one for each site. If four collection events were held at the same address, then only one annual report must be submitted, for that site.

- If you only hold a collection event one time at a specific location during the year, you might find it easier to file your annual report *within a few days after the event* rather than waiting until February 1st to submit.

The average time to complete a notification or annual report is one hour. Neither involves submission of any fees.

II. Guidance on Hosting a Collection Event

A successful electronic waste collection event requires significant planning to ensure that you have the space needed to collect potentially large volumes of waste, that event traffic flows smoothly, and that the waste you collect is handled and transported to the recycling facility in compliance with the law.

You should allow plenty of time to:

- Reserve a site or location if needed
- Choose a sponsor/collector/recycler
- Publicize your event

Safety Issues

Electronic waste is **hazardous waste** and should be managed according to DTSC regulations to prevent breakage and exposure. Remember, CRT glass contains **lead**. Electronic wastes that break open because of careless handling may release hazardous toner ink, highly flammable lithium batteries, capacitors containing polychlorinated biphenyls (PCBs), mineral oil, and/or fluorescent lamps that may contain mercury.

DTSC highly recommends that businesses that host or sponsor collection events provide information and training to **anyone** that is collecting e-waste on their behalf. DTSC recommends that you become familiar with other state laws concerning labor practices and safety concerns for collection events. This is especially important if children will be handling e-waste.

If you are a host who will be working with a sponsor, collector, or recycler, use one who has properly notified DTSC of their e-waste activities. To locate a sponsor, collector, or recycler who has notified DTSC go to http://www.dtsc.ca.gov/database/UWED/counties_map.cfm.

Other planning considerations include the following:

- Traffic Control
- Traffic Barriers
- Donation Form Completion
- Unloading & Loading Vehicles/Receptacles
- Event Schedule
- Volunteer Parking & Arrival
- Advertising/Pre-event Fliers and Post-event Branding
- Photography to document your event

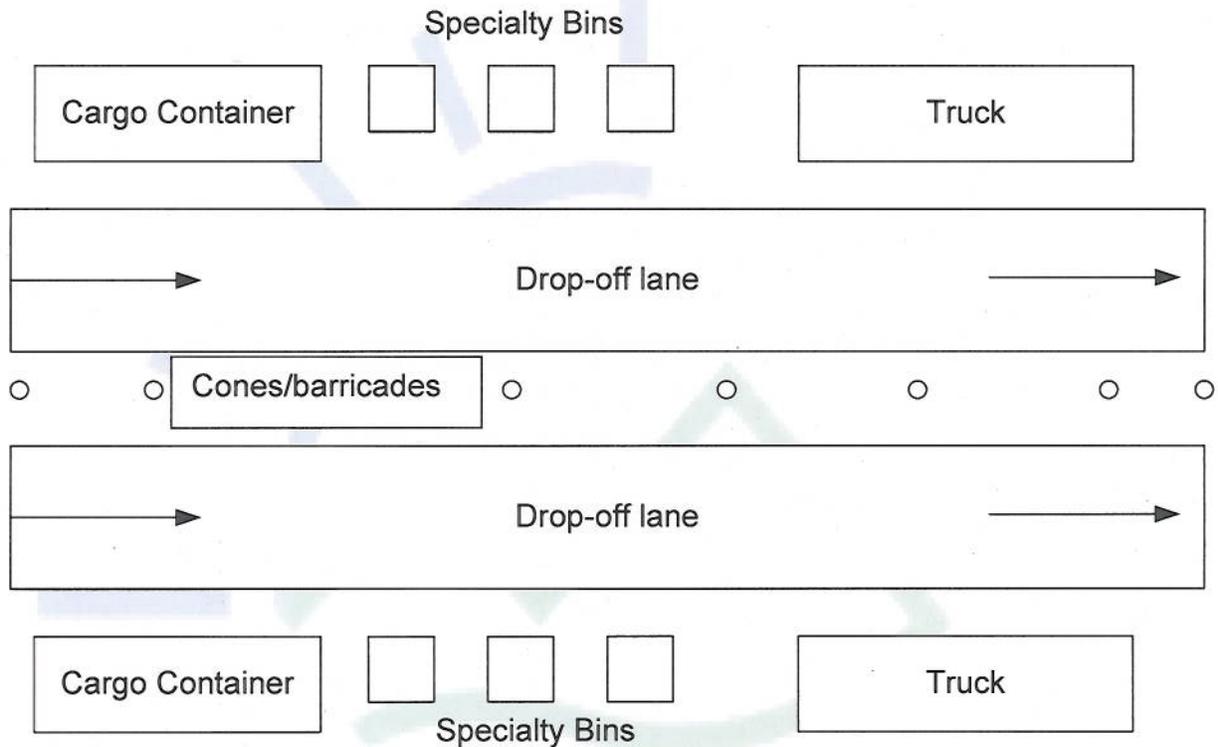
Some of these considerations are elaborated on below.

Traffic Control

Your traffic control plan will depend on the physical configuration of the e-waste event. A possible scenario is shown below. Consider placing receptacles on the **outside** of

traffic lanes so that event handlers do not have to cross traffic to collect items. The traffic path and parking areas may be marked with orange cones and/or barricades. A host should work with the sponsor to determine what equipment will be needed and to develop a plan for the timely removal of full trucks, so that e-waste won't accumulate in the parking lot where it can be struck by moving vehicles.

A Possible Traffic Control Plan for an E-Waste Collection Event



Example: Event Schedule and Logistics

Consider the following schedule for an event that will begin at 10:00 am and end at 2:00 pm.

- 8:00-9:00: Place cones, tables/chairs (for literature and branding of your company/organization) and traffic signs
- 9:00-9:30: Workers arrive to begin set-up
- 9:45: First vehicles begin to arrive with drop-offs
- 10:00-2:00: Collection of e-waste and truck loading
- 2:00-2:30: Break down tables, discuss event with sponsor/collector/recycler, conduct any needed clean-up, and wrap up event

Specialty Bins: You may consider designating special containers for unusual or breakable e-waste items, such as science fair experiments or antique items.

Branding/Tabling: If possible, consider hosting a table with handouts including information on how e-waste is recycled and where to take other common wastes (paint, tires, etc.).

Worker Parking & Arrival: You may consider having event workers park on adjacent streets or in designated parking areas to free up space for donor vehicles.

Lot Traffic Management: Consider designating two to four workers to act as traffic directors. To reduce street traffic, directors at the entrance can direct the donor to an appropriate drop-off lane; directors at the exit may triage donor exit.

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Disclaimer:

This document is not intended to be a comprehensive reference and is not meant to supersede the regulations and requirements governing the management of electronic waste. For complete information on how to manage electronic wastes, please refer to California Code of Regulations, title 22, chapter 23.

Questions or Comments:

If you have questions specifically about hosting or notifying for your collection event, or submitting the required annual report, send an email to electronicwaste@dtsc.ca.gov and DTSC will respond to you promptly. If you have questions about the California Integrated Waste Management Board's Covered Electronic Waste (CEW) program, visit <http://www.ciwmb.ca.gov/Electronics/Act2003/> for more information.