# 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

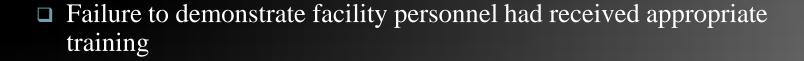
■ RECORD KEEPING ISSUES

☐ 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



■ Facility Site Plans & descriptions were inaccurate, incomplete and/or were not revised/updated as needed



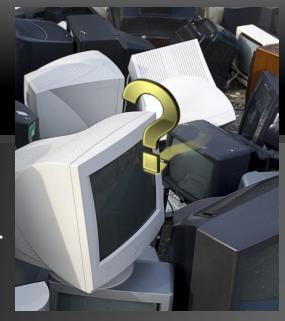
# RECORD KEEPING VIOLATIONS (CON'T)

- 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



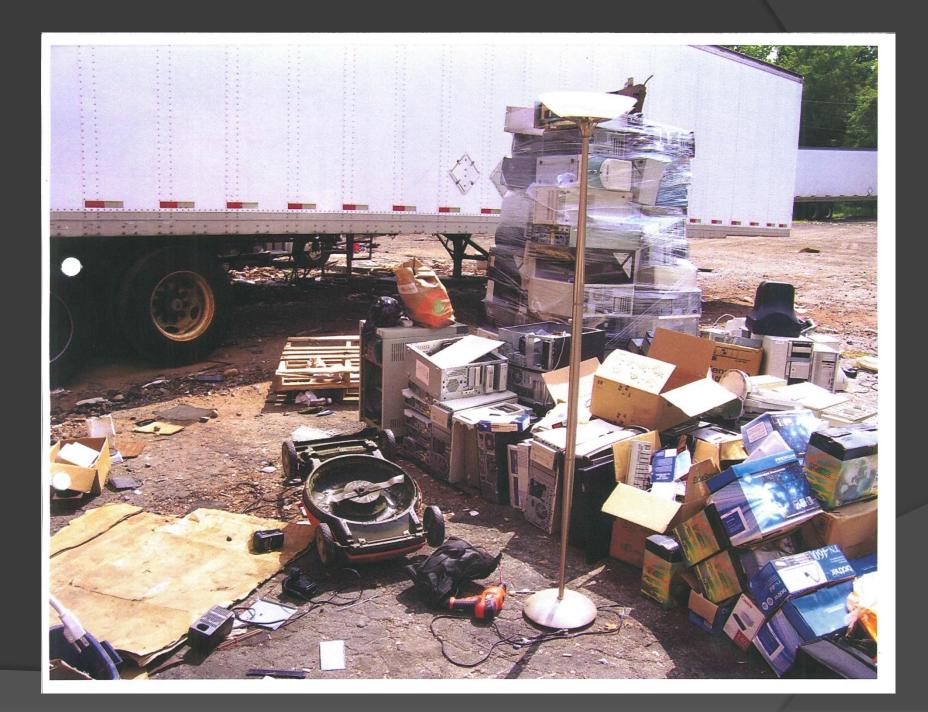
- No dates of accumulation/storage beyond 1 year limit
- No adequate aisle space in disassembly area
- Commingling of wastes

# 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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