

Special Collection Facilities

Are special, specific exemptions or standards needed for certain activities?

Transporter Exemption

- Transporter exemption expected to continue, probably made more explicit
- Sample language:
“used electronics directed for scrap metal or CRT glass recycling as exempted or excluded under 371.x are exempt from this Part.”

Collection Facilities

- Refers to the site where collected, stored consolidated.

Types of Collection Facilities

- Municipal Governments
- Private organizations in recycling or waste business (household & non-household)
- Producers subject to NYC & other states' legislation
- Retailers with take-back programs
- Private companies in e-waste business

Municipal collection

- Might collect both household and non-household electronics
- Might be at site of a permitted transfer facility or household hazardous waste collection facility

Municipal collection – 3 alternatives

Current	Proposed*
Household hazardous waste permit	Unchanged (special e-waste standards in draft 362-3)
Permit modification for permitted SWMF or transfer facility	Unchanged
C7 notification, send for recycling, special conditions	New 374-5 Permit-by-rule or exemption (similar to 360 re-write)

Private collection

Private companies in recycling or waste business (household & non-household)

Current	Proposed*
Permit modification for permitted SWMF or transfer facility	Unchanged
C7 notification, send for recycling, special conditions	New 374-5 Permit-by-rule or exemption (similar to 360 re-write)

Electronics Manufacturers

- Regulation depends on activities, facilities
- Might use a variety of different facilities
- Transport expected to remain exempt

Retail Takeback

- Reverse distribution
- May be combination of household & non-household
- Volume & storage time determine regulations?

Retailer alternatives

Current	Proposed*
360 Regulations do not have an applicable exemption	
C7 notification, send for recycling, special conditions	(1) C7 notification; and (2) special exemption or permit-by-rule

Possible Collection Exemptions

- 5 to 10 day to facilitate transport, consolidate loads, reverse distribution
- Privately sponsored collection events – special considerations like traffic control, site security
- Longer-term storage

Standards to consider

- Electronics directed for reuse or recycling
- Some sort of time limits & record-keeping
- Protection from weather
- Site security
- Local codes
- Emergency provisions

Sample Standards for Collection Facilities

Permit-by-Rule or exemption

- No processing, no direct export
- C7 notification, directed for recycling
- Storage to protect from weather; aisle space
- Meet local codes
- Require removal within xx days of acceptance
- Mark date received
- Control entry
- Operator provides annual training to all employees
- Recordkeeping
- Annual report, including a summary of daily records
- Storage volume limits

Comments

- Please comment in writing (e-mail, fax or regular mail).
- Data is very helpful – impacts, costs, benefits.
- Latest information will be placed on DEC website.

Comments & Questions:

E-mail: ewaste@gw.dec.state.ny.us

For more information on the proposed rulemaking, visit:

<http://www.dec.ny.gov/chemical/43339.html>

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