

LOCAL CONSERVATION CORPS E-WASTE COLLECTION PROGRAM RESOURCE

Resources and Web Links to E-Waste Collection Program
Management,
Reporting and Environmental Compliance

Jim Madden

CalRecycle Grant
Manager, Local
Conservation Corps

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Disclaimer:

This resource document and related video material (where applicable) is for the exclusive use of participants in the California Local Conservation Corps Grant Program (LCCs). The purpose of this resource is to provide information and reference links to assist LCCs in management of the material collection programs funded by the CalRecycle Local Conservation Corps Grant Program. Use of this material by persons or organizations other than LCC's may result in compliance violations.

This resource document does not supplant grantee responsibility to read and comply with all relevant statutes and regulations whether included or omitted from this document.

Grantees are further responsible to monitor and comply with relevant changes related to regulatory and statutory requirements.

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Introduction: Covered Electronic Waste (CEW) Resource Document

This resource document provides important information and quick reference links to assist Local Conservation Corps (LCCs) in managing E-waste collection programs.

This document is not an alternative to reading and understanding both statute and regulations (both current and proposed). As certain components of electronic devices may be considered hazardous due to heavy metal or other constituents, the end-of-life handling of some electronic discards is regulated by either federal (Resource Conservation & Recovery Act--RCRA) or State (Health & Safety Code (H&SC) hazardous waste laws, or both. Regulations in Title 14, Division 7 of the California Code of Regulations (CCR) were promulgated to implement the Electronic Waste Recycling Act (EWRA) of 2003, with regulatory authority delegated to the Department of Recycling and Resources Recovery (CalRecycle) and Department of Toxic Substance Control (DTSC).

Contact Information

Questions regarding LCC E-waste collections programs should first be addressed to Jim Madden who may then refer the inquiry to CalRecycle's E-waste program staff.

LCC Grants:

- Jim Madden, E-waste Lead: jim.madden@calrecycle.ca.gov or (916) 322-8855

E-Waste:

- Lori Near, Local Assistance - E-Waste Branch. Liaison for Local Conservation Corps; lori.near@calrecycle.ca.gov 916-341-6302
- Net Cost Reporting: ewaste@calrecycle.ca.gov or (866) 218-6103
- CEWIS: CEWIS@calrecycle.ca.gov
- POD Designations Assistance – E-Waste Branch, EWasteDesignations@calrecycle.ca.gov

Department of Toxic Substance Control (DTSC):

- General questions: Regulatory Assistance Office: 1-800-728-6942 or RAO@dtsc.ca.gov
- Regulatory support: electronicwaste@dtsc.ca.gov

General Overview and Main Web Sites

Handlers and Recyclers

[California Code of Regulations \(CCR\) Title 14, Div7, Chapter 8.2](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=IAA4F5CE05B4D11EC976B000D3A7C4BC3&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default))

[https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=IAA4F5CE05B4D11EC976B000D3A7C4BC3&originationContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=IAA4F5CE05B4D11EC976B000D3A7C4BC3&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default))

Handler: A universal waste handler is defined in California Code of Regulations (CCR) as a:

- 1) generator of universal waste.
- 2) the owner or operator of a facility that receives waste (including e-waste) from other universal waste handlers, accumulates universal waste, and sends universal waste to another universal waste handler, destination facility, or foreign destination; or
- 3) the owner or operator of a facility who is authorized to treat universal waste according to A Handler may choose to be an Approved Collector participant in the CalRecycle Covered Electronics Waste (CEW) payment program.

Recycler: “A handler who performs a treatment to change the composition of electronic devices, CRTs, CRT glass, or residual printed circuit boards. These treatment processes include dismantling electronic devices; removing yokes from CRTs; physical treatment such as cutting, breaking, shredding; physical separation based on properties such as size density, ferromagnetism; use of pinpoint torch/hot wire; and sampling, burning, ball milling.”

Approved Collector vs Handler

An Approved Collector is a handler that participants in the CalRecycle Covered Electronics Waste (CEW) payment program. In 2006, the California Integrated Waste Management Board (now the Department of Resources Recycling and Recovery or CalRecycle) adopted regulations to implement portions of the Electronic Waste Recycling Act of 2003. This landmark legislation established a funding system for the collection and recycling of certain electronic wastes. A key element of the Act that affects E-waste collectors and recyclers is the availability of recovery and recycling payments to approved participants for collection and recycling activities.

An E-waste Handler is an entity that collects E-waste yet has chosen not to become an Approved Collector and part of the CEW payment system. These individuals must be aware of and abide by the regulations set forth by the Department of Toxic Substances Control (DTSC) for safe handling of Universal Waste. Compliance with filing timely DTSC Notice of Intent (NOI) is also required for all Drop-off collection events. Documentation of collected CEW is required by

completing the Standard 198 Log forms for submittal to Approved E-recyclers when transferring CEW. Handlers are not required to submit the CalRecycle Net Cost Report, because they are not part of the payment program.

Instructions How to Fill Out the CEWIS 198 Log Form

[Resource tutorial on filling out the 198 Log Forms](https://calrecycle.ca.gov/electronics/formsandinfo/)
(<https://calrecycle.ca.gov/electronics/formsandinfo/>)

On the web page Scroll to Collector Outreach section and select the *Collector & Handler Informational Outreach Packet* link. The info is found on page 7 *Collection Logs*.

Log forms must be submitted with all the required information or line items on the form will be rejected for payment. E-Recyclers rarely review the completeness of your logs so take care in filling these out. The E-recycler will not be happy when payments are refused by CalRecycle due to improper management of 198 logs.

Requirements to Maintain Approved Collector Status

To maintain the active status in the CEWIS system LCCs must send at least one E-waste load to an Approved E-waste Recycler within the two-year renewal period. If no activity has taken place in the previous two years of participation, the LCC application to be an Approved Collector may be withdrawn. If an LCC transfers to E-waste to an E-waste Collector rather than an Approved Recycler it is possible that the CEW sent to that collector will not appear in CEWIS under the LCC's ID number. This could result in no activity connected to the LCC CEWIS ID number and cause the CEWIS ID number to become In Active.

To re-activate the CEWIS ID number, contact the Liaison for Local Conservation Corps at the Local Assistance - E-Waste Branch (see Contact information above). There is a waiting period of 90 days in which you cannot legally conduct collection activity. To avoid having the CEWIS ID becoming Inactive, a load of E-waste should be sent to an Approved E- waste Recycler at least once per year.

The Approved E-waste Recycler defines what a load is; it may be a truckload, pounds, or number of pallets.

All LCCs should establish a secondary Approved E-waste Recycler (E-recycler) as a backup and send a load to them within 180 days after you execute an agreement. Send loads at least every 12 months from the date of your renewal to keep the agreement active. A second E-recycler agreement enables LCCs to easily switch in the event the primary vendor is suddenly out of business or other issues arise. (See APPENDIX I: Due Diligence Suggestions for Selecting an E-waste Recycler)

Forms and Information Supporting Participation in the Covered Electronic Waste Recycling System

[CEW Recycling Program \(https://calrecycle.ca.gov/Electronics/CEW/\)](https://calrecycle.ca.gov/Electronics/CEW/)

- CEW Recycling Program Application Forms to Participate
- CEW Collection and Recycling Forms and Documents
- Listserv-Receive regular updates on E-waste program changes.
- Net Cost Forms and Guidance and FAQs
- Collector Outreach Info
- Weighmaster Enforcement Program

Updating the Covered Electronic Waste Information System (CEWIS)

CEWIS (<https://secure.calrecycle.ca.gov/CEWIS/SignIn.aspx>) is where the CEW that LCCs collected and transferred to their contracted E-Recycler is reported to CalRecycle. The 198-log form submitted to the E-Recycler is attached to their log form and submitted to CalRecycle for payment.

IMPORTANT - The CEWIS system must be updated:

- **within 10 days** after a change in personnel that adds or deletes contacts identified in the system,
- **within 30 days** when there is a change of address.

Failing to do updates within these timelines may result in a temporally suspension of the Approved Collector status.

List of E-waste Collectors and E-Recyclers

[CalRecycle Public Facing E-waste web site](https://calrecycle.ca.gov/electronics/)

(<https://calrecycle.ca.gov/electronics/>)

This site provides a list of E-waste collectors and E-Recyclers and other info for the public.

Department of Toxic Substance Control

Introduction - comprehensive explanation on E-waste, Universal Waste, and program resource links [DTSC – Managing Hazardous Waste \(https://dtsc.ca.gov/e-waste-more-information/\)](https://dtsc.ca.gov/e-waste-more-information/)

Requirements for E-Waste Handlers

[Defining different types of E-waste, Collectors vs Recycled and much more. \(https://dtsc.ca.gov/e-waste-more-information/\)](https://dtsc.ca.gov/e-waste-more-information/)

- [Facility ID # \(https://dtsc.ca.gov/apply-for-hazardous-waste-epa-id-number/\)](https://dtsc.ca.gov/apply-for-hazardous-waste-epa-id-number/) The DTSC Facility ID # must be issued to every LCC facility where E-waste is collected or consolidated.
 - Notify DTSC of E-waste Handling activities by filing a Notice of Intent - [NOI \(https://hwts.dtsc.ca.gov/uwed/\)](https://hwts.dtsc.ca.gov/uwed/)
 - [DTSC Annual Report FAQ \(https://dtsc.ca.gov/e-waste-annual-report-frequently-asked-questions-faqs/\)](https://dtsc.ca.gov/e-waste-annual-report-frequently-asked-questions-faqs/)
 - What is E-waste?
 - Info for E-waste Handlers (Collectors)
 - E-waste Legislation and Regulations
 - DTSC Outreach Materials
- Guidance Document: *Preparing for a DTSC Inspection of Your E- Waste Facility* ([Guidance Document: Preparing for a DTSC Inspection of Your E-Waste Facility \(ca.gov\)](https://dtsc.ca.gov/wp-content/uploads/sites/31/2015/05/EwastePreparingInsp.pdf)). (<https://dtsc.ca.gov/wp-content/uploads/sites/31/2015/05/EwastePreparingInsp.pdf>) Info on what DTSC will inspect at your facility and required Universal Waste Training documentation

Two Methods for Conducting E-waste Collection Programs

Curbside Collections – This method for acquisition of E-waste, includes collecting E-waste from individual locations such as businesses, homes, and other facilities. Curbside Collections are not the same as an advertised scheduled drop-off event. Times and days will vary depending on the request of the E-waste owner, or when your LCC has set the date and time range to conduct curbside collections.

Note: If your facility is listed in CEWIS, for receiving E-waste during businesses hours this is considered Curbside Collections. It is not a Drop-off Event. More on the Drop-off method below.

Drop-off Events – Dropoff Events must be advertised at least 30 days in advance for a particular date and time range as a Drop-off collection. Accepting E-waste by this method is considered a Drop-off event when the Approved Collector or Handler advertises at least 30 days in advance that a collection event will be held at a certain location on set date(s) and time ranges. Collectors or Handlers must file a NOI at least 30 days in advance with the DTSC.

The table below further defines the differences between the two categories of E-waste collections.

Curbside Collections*	Drop-off Events*
<ul style="list-style-type: none"> • Collections from fixed address locations (i.e., businesses, residential, schools, local government agencies, etc.) <p>Dates and times for pick-ups vary depending on request or Corps schedule</p>	<ul style="list-style-type: none"> • Setting up at a designated location with set dates, which may include sponsored periodic events, for E-waste collection. <p>The NOI must be filed no less than 30 days in advance of the event on the Department of Toxic Substance Control (DTSC) web page.</p>
<ul style="list-style-type: none"> • Marketing / canvassing/ door hanger may be utilized. • Includes your facility if listed as a drop-off location, or a fixed drop-off site if you accept drop-offs of E-waste. This activity is not considered as a Drop-off event. 	<ul style="list-style-type: none"> • <u>Marketing outreach is required</u> and is vital to the success of drop-off events. <p>Corps web site – Important resource for local businesses and residents to learn more about your E-waste Collections and you Corps.</p>

Logging CEWs on Form 198 is a required process for these methods

IMPORTANT: Track all loads for the DTSC Annual Report, due Feb 1st and the CalRecycle Net Cost Report, due March 1st by doing the following:

- Request from the E-Recycler load identifiers for each collected source.
- Each Drop-off event load should be sent to the E-recycler as a segregated load from other Drop-off events and from Curbside loads.
- All Drop-off events that were conducted under a POD must be kept as segregated loads (no acceptations)
- All Curbside loads can be consolidated as one.

E-Recycler pick up of the loads no matter the source can go as one mass shipment to the E-recycler

Note: For your internal tracking and annual reporting purposes, all illegally dumped, abandoned E-waste are defined as Source Anonymous (SA). Source Anonymous E-waste which is Covered Electronic Wastes (CEW) (CRTs, Flat Panel screens and laptops) when the originating California source (owner) cannot be identified on a collection log.

SA E-waste are considered a subset of Curbside Collections. All SA CEW must be logged using "Form 198 SA".

Other considerations apply if operating as a Designated Approved Collector (DAC) for a Local Government Agency under a Proof of Designation (POD) (see the Proof of Designations section and link below)

Choosing an E-waste Recycler

Selecting an E-recycler is an important decision that requires due diligence because as an Approved Collector, the LCC's standing with CalRecycle's E-waste unit, and your relationship with DTSC can be at stake. Assessment of stated performance standards can be measured and validated when an agreement between your Corps and the E-Recycler is executed.

(See **Appendix I** for the *Due Diligence for E-Recyclers* tip sheet)

Proof of Designations (POD) and Designated Approved Collectors (DAC)

It is recommended that all local government agencies considering the issuance of a Proof of Designation (POD) first email EWasteDesignations@calrecycle.ca.gov for specific questions relating to Designations before beginning the application process. Approved Designated Collector (DAC) applications are complex, and it is important that both the Corps and local jurisdiction understand the roles and the requirements of a Designated Approved Collector.

A DAC that holds a POD may transfer segregated E-waste loads generated under each POD and each collection activity under a POD to another DAC, or directly to an approved E-Recycler. Regulation section 18660.49(d) states, "A DAC shall provide evidence of an applicable POD to another approved collector or approved E-recycler at the time CEW and the associated collection documentation are transferred from the DAC."

IMPORTANT. Each load collected under a POD must be segregated from all other loads collected. It must be clearly identified by a specific pick-up identifier issued by the E-recycler and the log form must have an attached copy of the POD. Failure to follow these steps will cause the entire POD load to be rejected for payment by CalRecycle.

The CalRecycle web page [Designated Approved Collectors](https://calrecycle.ca.gov/Electronics/Locals/) (<https://calrecycle.ca.gov/Electronics/Locals/>) and Proof of Designation (POD) has additional information to consider regarding the DAC status.

A Designation is an arrangement established by a California Local Government with an Approved Collector in the Covered Electronic Waste (CEW) recovery and recycling program. The Designation allows the Approved Collector to provide CEW collection services on behalf of the Local Government as a Designated Approved Collector.

Internships

As an alternative to disassembly at your facility, internship partnerships with refurbishers or E- waste recyclers can provide both training and experience.

Some internship program guidelines to consider:

- Must be a planned program for learning/skill development with specific learning objectives and outcomes.
- It must last an adequate length of time to achieve the learning objectives.
- In addition to knowledge base of E-waste disassembly or repair, Corpsmembers should be safety trained by the provider. This should entail in-depth safety training and use of PPE as the exposure to toxins are higher during disassembly.
- Execute an agreement or MOU which is subject to review and approval by CalRecycle Grant Manager
- Corpsmember's wages during the internship are eligible grant costs.

See Appendix II for *Tips on Internships for Electronics Recyclers and Refurbishers*

Training for Safe Handling of E-waste at Local Corps Facility and Collection locations

There are two types of safety training for E-waste collection programs.

- *Department of Toxic Substances Control (DTSC) Universal Waste (UW) Training Guide*; and *Emergency Training (Spill Response)* required by DTSC.
- Collection Program Guides and U-Tube PowerPoint presentations for training are located at the [Local Conservation Corps Grant Program \(https://calrecycle.ca.gov/funding/localcc/\)](https://calrecycle.ca.gov/funding/localcc/). Scroll to bottom left and locate **Program Guides** section.
- Safe Handling of E-Waste per CalOSHA guidelines.

All persons that are involved in E-waste collections are required to complete both DTSC Universal Waste trainings annually and must receive a 70% or better score on both tests. Records of who attended the training and the test scores must be kept on file for 3 years kept on-site at the facility where the E-waste is collected. All necessary documents are in the training documents. The [DTSC\) Inspection Checklist \(https://dtsc.ca.gov/wp-content/uploads/sites/31/2015/05/EwastePreparingInsp.pdf\)](https://dtsc.ca.gov/wp-content/uploads/sites/31/2015/05/EwastePreparingInsp.pdf) details two required trainings (see section titled Training Records, page 4).

Note: Universal Waste Safety Training includes seven categories: E-waste, fluorescent bulbs, batteries, mercury- containing items, non-empty spray paints cans, and broken CRTs. In many cases, you are a generator of the materials or handling some of these materials. Please note that the training must cover all these

materials to be compliant even if your facility does not use or provide collection for some items beyond E-waste.

CalOSHA Safety Training

Includes all the items listed below and should be a recurring part of your training program. Safe handling of E-waste includes the following operational components:

- i. Stacking **CRTs** (usually contained in devices with electronic screens) on pallets and shrink-wrapping.
- ii. Securing loads on your truck.
- iii. Safe warehousing, including the use of pallet- jacks, forklifts, pallet rack shelving.
- iv. Inspecting pallets for safe load stability.
- v. Safe lifting to reduce bodily strain / injury.
- vi. Safety at Drop-Off Events, and Curbside Collections, traffic control, spill kits and cleanup procedures.

CalOSHA - Health and Safety Info and Requirements

Department of Industrial Relations

[Index to the Cal/OSHA Regulations
\(https://www.dir.ca.gov/title8index/T8index.asp\)](https://www.dir.ca.gov/title8index/T8index.asp)

[DOSH - Publications, Research and Education
\(https://www.dir.ca.gov/dosh/puborder.asp#IIPP\)](https://www.dir.ca.gov/dosh/puborder.asp#IIPP)

[Heat Illness Prevention
\(https://www.dir.ca.gov/dosh/HeatIllnessInfo.html\)](https://www.dir.ca.gov/dosh/HeatIllnessInfo.html)

For more information on CalOSHA Safety seek out a Safety Trainer for resources and support.

Other Related Regulatory Agency Considerations

Anyone who generates, transports, offers for transport, treats, stores, or **disposes of hazardous waste** are collectively called "**handlers**". Identification as a handler of Universal Waste, either as a Designated Approved Collector or an E-waste Collector identified in CEWIS and DTSC systems, subjects your facility to other environmental and safety regulatory agency compliance requirements. A DTSC site inspection may include the local governmental agency Environmental Services Department. Below are a few of the most significant areas of concern.

Note: Disposal includes everything that your facility generated as waste including any listed hazardous waste that you collected as part of any program that you are involved with if the hazardous waste is bought to your

facility and could also involve transportation considerations.

See Appendix III for Resources for Environmental Safety and Health Codes for Local Conservation Corps Registered as Approved CEW Collector

State EPA Waste ID Numbers: CalEPA and info on the Hazardous Waste

Access Cal EPA web site links below to get a State or Federal EPA ID #

[EPA Facility ID #'s \(https://dtsc.ca.gov/hazardous-waste-id-numbers/\)](https://dtsc.ca.gov/hazardous-waste-id-numbers/)

Facilities that handle, generate, or store hazardous waste must have a state and/or federal ID number which are used to identify hazardous waste handlers, and to track the hazardous waste from the point of origin to its final disposal location (also known as "Cradle to Grave"). Which EPA ID you need, either state or Federal, depends on the volume of hazardous waste that is generated.

- State ID numbers are owner and site specific.
- Federal EPA ID numbers are site specific.

Considerations include such things as fuels and propane tanks along with the total amount and types of chemicals that are kept on site for the various program and facility operations.

[Generator Classification \(https://dtsc.ca.gov/generators/\)](https://dtsc.ca.gov/generators/)

In California, generators are divided into 2 categories:

- **Generators of 1,000 kg** or more of hazardous waste per month, excluding universal wastes, and/or more than 1 kg of acutely or extremely hazardous per month (commonly referred to as Large Quantity Generators (LQGs), or
- **Generators of less than 1,000 kg** of hazardous waste per month, excluding universal wastes, and/or 1kg or less of acutely or extremely hazardous waste per month (defined as Small Quantity Generators (SQGs)

Federal - Resource Conservation and Recovery Act (RCRA)

The public law that creates the framework for the proper management of hazardous and non-hazardous solid waste. [RCRA Overview](#)

<https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcra-overview>

U.S. EPA

[U.S. EPA Information on Region 9 Regulatory Programs](#)

<https://www.epa.gov/environmental-topics/land-waste-and-cleanup-topics>)

Promoting the safe handling of hazardous wastes, cleanup of contaminated land, and reducing trash

Calif. Local Government Environmental Agency and Hazardous Materials Business Plans

- [DTSC Managing Hazardous Waste \(https://dtsc.ca.gov/certified-unified-program-agencies-cupa/\)](https://dtsc.ca.gov/certified-unified-program-agencies-cupa/) Certified Unified Program Agencies (CUPA)
- [California Certified Unified Program Agencies \(https://calcupa.org/\)](https://calcupa.org/) Info and resources
- Local Environment Management Departments
- Hazardous Material Business Plans (HMBP)
- Federal Community Right-to-Know Act (EPCRA)
- [California Environmental HMPB Reporting System \(http://cers.calepa.ca.gov/\)](http://cers.calepa.ca.gov/) Links to reporting info and facility chemical inventories

Note: If an LCC uses compressed gas cylinders (propane C₃H₈) for the forklift, the total amount stored at the facility must also be part of the CUPA HMBP along with all chemicals used on premises. To report the amount of propane for the HMBP use the following to convert: For pounds multiply by 8.1. For gallons multiply by 34.1. (See the HMBP form for further info)

Disassembly of Used Electronics

Should your Corps elect to undertake disassembly (removal of user-replaceable components) of electronics, you are required to conduct additional recordkeeping (see the links below). Even simple disassembly may lead to issues during a DTSC inspection although you are not performing treatment or processing of electronic components. At no time should an Approved Collector provide treatment / processing to change the composition of electronics during disassembly. Doing so is a clear violation and is considered as operating as a recycler of E- waste.

Recycler: A handler who performs a treatment to change the composition of

electronic devices, CRTs, CRT glass, or residual printed circuit boards. These treatment processes include dismantling electronic devices; removing yokes from CRTs; physical treatment such as cutting, breaking, shredding; physical separation based on properties such as size density, ferromagnetism; use of pinpoint torch/hot wire; and sampling, burning, ball milling.

Reference the following Westlaw Sections; [Standards for Universal Waste Management](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=IA0C4A5405B6111EC9451000D3A7C4BC3&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default))) ([https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=IA0C4A5405B6111EC9451000D3A7C4BC3&originationContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=IA0C4A5405B6111EC9451000D3A7C4BC3&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default))))

Disassembly activities may be considered if there is a clear employment path for corpsmembers and it results in an economic gain through the reduction of processing fees from your contracted recycler. Further the work must be safely conducted at your facility, provided you are not further processing any components to break them down or cutting electrical cords.

Conducting disassembly activity can provide training to Corpsmembers which may potentially enable them to find jobs at E-Recyclers.

Although disassembly of CRTs is allowed careful consideration should be given to the additional handling of bare CRTs and the potential for glass breakage. Broken and bare CRTs require special handling and must be packaged and segregated from all other e-waste. Additional emergency clean ups to handle the broken glass and bare CRTs must be conducted along with additional required documentation per the DTSC rules.

Please review thoroughly the related Title 22 CCRs listed above to assure compliance with the codes and regulations.

Refer to Appendix III for *Resources for Environmental Safety and Health Codes for Local Conservation Corps Registered as Approved CEW Collector*

APPENDIX I: Due Diligence Suggestions for Selecting an E-waste Recycler

Due Diligence Suggestions for Selecting an E-waste Recycler

Questions or areas to assess for potential E-waste Recyclers **Administrative:**

1. Can you provide an example of the documents that you send to E-waste collectors after receiving and/or processing a load? You want to examine the information that they provide on any receiving documents / acknowledgements including:
 - i. invoices
 - ii. settlement reports
 - iii. monthly statements or similar documents
2. How is your accounting system set up? Can the cost of processing be invoiced separately with all settlements/revenue shares on separate statements and paid separately, i.e. without taking any processing costs off the top?
3. If requested/needed, will you provide Certificates of Destruction for downline customers that can be emailed? Is there an extra charge for this? Does the certificate cover only the hard drive?
4. What data reports will you provide for the CalRecycle Net Cost and DTSC annual reports?
5. Explain your CEW load intake process. How is the CEW count verified? What is the process for reconciling numbers if the counts don't match?
6. How do they document all CEW devices? For example, are Flat Panels and Lap-tops listed by manufacture, model number, and serial number?

Logistics:

1. What is the minimum/maximum number of pallets you will pick up on a single load?
2. How much lead time do you need to schedule a pick-up?
3. What are your sorting categories and what are your sorting requirements before pick-up?
4. I have several regular collection accounts. Separate tracking and processing documents for each customer's load is needed, even if they arrive on the same truck. What sort of system do you have in place to manage that?
5. Separate tracking and processing of documents for POD designated loads is required, even if they arrive to you on the same truck. What system do you have to manage that?
6. Do you accept large copy/duplex machines and what is the cost?
7. Do you accept small home appliances and what is the cost?

Service & Supply Cost

1. Do you supply free Gaylords, pallets and shrink-wrap? If not, what are the cost of supplies?
2. Do you charge a fee for the pick-up? What is the cost and how is it calculated?
3. Do you accept larger IT room Uninterrupted Power Source (UPS) sealed lead acid batteries? Is there a return revenue?
4. Please provide your processing fees cost sheet for all services.
5. Do you provide a precious metals return revenue arrangement for all applicable electronics?

Certifications, Insurance and Contracts and Violations

1. What industry standard certifications do you have?
 - a. Check Recycler's web site for the certifications then see if they are current by checking the Certification Body web sites for [E-Stewards \(http://e-stewards.org/find-a-recycler/\)](http://e-stewards.org/find-a-recycler/) and Sustainable Electronics Recycling International (SERI) - [R2 \(https://sustainableelectronics.org/\)](https://sustainableelectronics.org/)
2. Please provide a copy of your Liability Insurance.
3. Please provide a sample/template of your standard Contract or MOU that we would sign.
4. Have you incurred any violations with CalRecycle? If so, when and for what? Is the situation resolved?
5. Has your company been cited by local air or water quality for any violations?
6. Has your company had any serious CalOSHA injuries or violations?
7. Have there been any local Environmental Services citations (CUPA)?

Facility Security & Safety

1. What security systems are installed at your facility?
2. What safety training do you provide to your employees?
3. What PPE are they given and required to use?

APPENDIX II: E-recycling / Refurbisher Internships

E-recycling / Refurbisher internships

Many Recyclers and Refurbisher companies operate on an extremely tight budget in today's market. Through an internship program with the Local Conservation Corps both organizations gain. The business can hire a trained employee, which is a challenge to find. Internships in the Electronics Recycling and Refurbishment sector is a great way for Corpsmembers (CM) to gain employable experience.

Ideally a cost of labor share would be the best arrangement, but if that can't happen the grant fund will pay the CM labor as it does now when they work on the various grant programs. By sharing the cost, you are leveraging the Grant funding and extending your budget.

Negotiating a 50/50 labor split is a good starting point, or even 60 /40 where they pay the majority. If the recycler or Refurbisher is already paying for interns, then the idea of a labor cost split should be an appealing concept for them. As a point of the labor share negotiations, mention that your Corps is footing the bill for the insurance (check with your insurance provider to be certain they will cover the internship). Recycling and Refurbisher companies stand to gain a well-trained future employee. The risk for them is minimized by hiring a person that may have limited training or experience.

An agreement between your LCC and the Recycler/Refurbisher is warranted to ensure that all parties are clear about their commitments and expectations. An agreement should contain details on the training that the CM will receive as well as performance expectations the CM must meet, such as the standard CM performance agreement concerns, as well as achievement of defined and demonstrated skills and learning objectives for them to be considered eligible for potential hire.

The training plan and subsequent work experience should be set out in a timeline that accommodates both the CM schedule, and their involvement with the LCC, i.e. can they complete it before 'timing out' of the program and meshing with their class schedule or other LCC programs.

All safety training must be provided by the Recycler/Refurbisher and must be related to the type or level of work the CM performs. People who work in this sector have greater potential for exposure to hazardous materials. That being the case CMs should be provided with additional safety training and PPE.

Specify the list of the safety training the CM will receive in your agreement. Local Conservation Corps leadership should receive a report of the CM passing any tests, certifications or exams. Inform the Recycler / Refurbisher if the CM has already passed related safety training such as Universal Waste, forklift operation, and safe handling of E-waste.

Ask that the Recycler / Refurbisher provide a letter of recommendation at the end of

a successful internship. The letter should list what was achieved, training provided, and work performance. It can serve as a great reference for the CM for job applications and interviews.

APPENDIX III: Resources Environmental Safety and Health Codes for LCCs Registered as Approved CEW Collector

Resources for Environmental Safety and Health Codes for Local Conservation Corps Registered as Approved CEW Collector

As a registered and approved CEW collector LCCs are subject to several different regulatory and safety agency inspections, and potential code violations exposure. CalRecycle's CEW registry is tied to the Department of Toxic Substance Control (DTSC) which is the enforcement side of the Universal Waste regulations for E-waste.

DTSC makes surprise inspections of facilities which are registered as CEW E-waste collectors. They will often bring the local Environmental Safety Department inspector along to conduct a joint inspection.

The local Environmental Safety Department is tied to other various enforcement agencies who could be notified if other safety or code violations are observed.

The table on the following page is a brief overview of areas of concern throughout your facility and across all programs. This list is not meant to be used as a complete checklist for your facility. The programs contained in the table vary as do the requirements for compliance.

Abbreviations:

CCR – California Code of Regulations

CFR – Code of Federal Regulations

HSC – Health & Safety Code

Areas of Potential Exposure	Regulations	Regulatory Agency
Universal Waste – Electronics– Batteries – Lamps (Bulbs)		
Compliance with Universal Waste Batteries	22 CCR, Div 4.5, Chpt 23	DTSC/CUPA
Compliance with Universal Waste Lamps	22 CCR, Div 4.5, Chpt 22 Art 1 § 66273 22 CCR, Div 4.5, Chpt 12, Art 1, § 66262.11	DTSC/CUPA
Compliance with Universal Waste Electronic Devices	22 CCR, Div 4.5, Chpt 22 Art 1 § 66273	DTSC/CUPA
Compliance with Waste Designation and Labeling (also applies to other areas)	22 CCR, Div 4.5, Chpt 11 Art 2 § 66261.10	DTSC/CUPA
Compliance with Cal-Recycle Registration and Approval as a CEW Collector	14 CCR, Div 7, Chpt 8.2, Art 1 -7	DTSC/CUPA
Compliance with DTSC Notification as a Covered Electronic Waste (CEW) Collector	22 CCR, Div 4.5, (Chpts. as applicable) see link below	DTSC/CUPA
Other Material Program Specifics, Oil, Tires		
Compliance with Used Oil Management	CCR 22, Div 4.5, Chpt 29 (Articles as applicable)	DTSC/CUPA
Tires – numerous codes for standards, storage, building design, operator responsibility, permits and many more	CCR 14, Div 7, Chapter 3, Article 5.5	CalOSHA, DTSC
Bottles & Can Recycling	See list below	Resources at SWANA

Not part of the CalRecycle grant but area of concern is under the same regulatory agencies or other programs where safety is a concern, such as weed abatement litter pick-ups etc.	PPE, Vector Controls, Chain Saw operation, other equipment, fuel storage etc.	Cal-OSHA DTSC, Cal-EPA others
Chemicals and Facility Registrations		
Occupational Safety and Health Act (OSH Act), and the Toxic Substances Control Act (TSCA)	CFR 29, 1910.1200 (see link below)	Federal & Cal-OSHA
Compliance with Chemical Storage, Labeling and Hazard Communication	CCR 8 §5164; and CCR Title 8 §5194	Cal-OSHA
Compliance with Establishment of Hazardous Materials Business Plan (HMBP)	HSC, Div 20, Chpt 6.11 [24000 – 26217]	DTSC/CUPA
Compliance with Hazardous Waste State ID Number Registration (Cal- EPA ID #)	Apply For A Hazardous Waste EPA Identification Number Department of Toxic Substances Control (https://dtsc.ca.gov/apply-for-hazardous-waste-epa-id-number/)	DTSC/CUPA
Compliance with Flammable and Combustible Cabinets Construction and Labeling	CCR 8, Div 1, Chpt 4, Sub 7, Group 20, Art 141 §5533.	Cal-OSHA
Compliance with Compressed Gas Cylinder Safety (propane tanks for forklifts)	CCR 8 Div 1 Chpt 4 and related subchapters	Fire Code / CUPA
Facility and Equipment		

Compliance with Inspection and Maintenance of Portable Fire Extinguishers	CCR 8, Div 1, Chpt 4 and related subchapters	Cal-OSHA
Compliance with Electrical Safety	CCR 8, Div 1, Chpt 4 and related subchapters	Cal-OSHA
Compliance with Establishment of Facility Injury and Illness Program	CCR 8, Div 1, Chpt 4, Sub 7 Group 2	Cal-OSHA
Compliance with Establishment of Facility Emergency Action Plan (SPILL RESPONSE SOPs)	CCR 8, Div 1, Chpt 4, Sub 7, Group 16, Art 1098	Cal-OSHA
Compliance with General Forklift Safety Operations	CCR 8, Div 1, Chpt 4, Sub 7, Group 13	Cal-OSHA
Compliance with Written Respiratory Program (If using certain equipment)	CCR 8, Div 1, Chpt 4, Sub 7, Group 2	Cal-OSHA
Compliance with Guardrails at Elevated Locations	CCR Title 8, Div 1, Chpt 4, Sub 7, Group 1, Art 2, §3214	Cal-OSHA
Compliance with Fixed Ladder Construction	CCR 8, Div 1, Chpt 4, Sub 7, Group 1, Art. 2, §3277	Cal-OSHA
Compliance Maintenance of Fire Sprinkler System	CCR 8, §6170(c)(2)(A)	Cal-OSHA
Compliance with Exit Signs and Means of Egress	CCR 8, §3216 & OSHA 1910.37(b).	Cal-OSHA/OSHA

California Code of Regulations (CCR)

The CCR Titles listed below detail various potential applicable regulations

[West Law California Code of Regulations](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?t)

<https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?t>

Title 8. Industrial Relations:

Division 1 Department of Industrial Relations Applicable Chapters

Title 10. Public Safety:
Division 1 State Fire Marshall Applicable chapters

Title 14. Natural Resources
Division 7. Department of Resources Recycling and Recovery Chapter 3, Article 5.5
Chapter 8.2 (and other related chapters)

Title 22. Social Security:
Division 4.5. Environmental Health Standards for the Management of Hazardous Waste
Chapters 10 – 16, 20 - 24, 29, 42

CA - Health & Safety Code (HSC)

Division 20 and others

[http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=25501.](http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=25501)

http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&title=&part=&chapter=6.11.&article=

Certified Unified Program Agency (CUPA)

CUPA and Hazardous Material Business Plan (HMBP)

(<https://calepa.ca.gov/cupa/>-) Safety Data Sheets and Chemical Inventories

The complete HMBP consists of the following info / forms:

- ◆ Hazardous Materials Business Plan Cover Sheet
- ◆ Business Activities Form
- ◆ Business Owner/Operator Identification Form
- ◆ Property Owner Identification Form
- ◆ Hazardous Materials Inventory - Chemical Description
- ◆ Facility Site Plan/Storage Map
- ◆ Emergency Response Plan /Contingency Plan
- ◆ Record Keeping
- ◆ Employee Training Plan

DTSC Hazardous Waste ID # (Cal EPA ID #)

Reference page 13

Index DTSC related codes [CCR 22 Division 4.5:](https://dtsc.ca.gov/title22/)
(<https://dtsc.ca.gov/title22/>)

Code of Federal Regulation ([CFR](https://www.dol.gov/general/cfr/title_29)) Title 29
(https://www.dol.gov/general/cfr/title_29)

California Right to Know/ Hazard Communication: What you need to know

Hazard communication standards, or worker “right-to-know” laws, regulate how information about workplace chemical hazards are communicated to employees. Like most workplace health and safety standards, worker right-to-know laws have developed according to standards adopted under the federal **Occupational Safety and Health Act (OSH Act)**, and the **Toxic Substances Control Act (TSCA)** which regulates worker right-to-know rules for pesticide applicators.

Right-to-know compliance under the OSH Act is part of every Occupational Safety and Health Administration (OSHA) inspection, regardless of the underlying reason for the inspection.

Worker right-to-know violations are the most frequent source of OSHA citations. Beyond the physical dangers a violation may create for employees and employers, substantial fines may be imposed, making right-to-know compliance a high priority for just about every employer (29 CFR 1910.1200). [OSHA Workers Rights](https://www.osha.gov/Publications/osh3021.pdf)
(<https://www.osha.gov/Publications/osh3021.pdf>)

Bottles and Cans Recycling and Collections

Solid Waste workers are in the top 5% of the at-risk jobs. This fact makes it important that your safety programs for this area are comprehensive and that training provided is documented.

Safety education should cover several areas:

- Sorting lines – operations and several other related areas of concern
- Safe vehicle driver operations
- Safe operation while in traffic (out of vehicle)
- Safe operation of machinery, pneumatic lift and compactors, either on the collection trucks or stand alone
- Safe lifting procedures
- PPE
- And several more

Many of these trainings can be obtained via the [Solid Waste Association of North America \(SWANA\)](https://swana.org/training-certification/find-a-course) (<https://swana.org/training-certification/find-a-course>)

Important Note: This document is meant to serve as a general reference only. Your facility may or may not have areas of concern that are referenced on this list. You are encouraged to enlist the assistance of a professional who can provide a thorough assessment of your situation for compliance with the various codes, rules, regulations, and guidelines.