Evaluating Compliance of Permitted Facilities Disassembling Used Electronics

Evelyn Silva, Environmental Analyst
Waste Engineering & Enforcement Division
CT Dept of Energy and Environmental Protection
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
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)**
Failure to demonstrate that inspections of disassembly areas had been performed

Failure to measure and record the quantities of used electronics received/shipped

Failure to demonstrate facility personnel had received appropriate training

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

CONTACT INFORMATION:

Email: evelyn.silva@ct.gov

Phone: (860) 424-3209