



E-waste Collection Sites Accepting Non-Residential CEDs



April 2018

ELECTRONIC WASTE MANAGEMENT ACT

On January 9, 2017 Former Governor Christie signed the amended Electronic Waste Management Act that clarified the definition of consumer to include, “a person, State entity, school district, local government unit or small businesses who purchases a covered electronic device (CED) in a transaction that is a retail sale”.

Consequently, E-waste Collection sites will be in the position to accept E-waste from non-residential consumers. Please be advised that CEDs collected from non-residential sources (local government, school districts, small business) are regulated as Universal Waste (UW), but those from residents are not.

Not all collection sites are obligated to accept all CEDs from all consumers, so, consumers should check with the intended collection site for any limitations on from whom or what type of CEDs they accept (as well as hours of

operation). The Department shall ensure that each county has sufficient collection opportunities available for all types of CEDs from all types of consumers.

UNIVERSAL WASTE RULES AFFECTED BY E-WASTE MANAGEMENT ACT

All CEDs as well as non-CEDs are “consumer electronics,” and if received from non-residential sources (i.e. schools), must be managed as Universal Waste.

Under the Universal Waste Rules, a handler of consumer electronics is regulated as a small or large quantity handler based on the quantity of consumer electronics accumulated at their facility at any given time. A “small quantity handler (SQH) of universal waste” is defined as a universal waste handler who accumulates less than 5,000 kilograms (11,000 lbs.) total of universal waste at any given time.

FACT SHEET

This includes all types of universal waste at the site. “A large quantity handler (LQH) of universal waste” is defined as a universal waste handler who accumulates 5,000 kilograms or more total of universal waste at any given time.

Therefore, if the quantity of CEDs together with any other universal waste (such as used oil, lamps, batteries, etc.) accumulated at the collection site is 5,000 kilograms or more total at any given time, the collection site is regulated as a Large Quantity Handler (LQH) of Universal Waste as defined at N.J.A.C. 7:26A-1.3. (See next page).



Administrative Process for LQH

An LQH does not require any permits or approvals from the Department to operate, rather needs to take the following two administrative steps:

1. Submit a Notification of New Jersey Universal Waste Handler Activities in prescribed forms to the Department's Division of Solid and Hazardous Waste. The forms are available at the Division's website: http://www.nj.gov/dep/dshw/lrm/uwaste/uw_handler.pdf, and

2. Obtain a unique EPA identification number by completing and submitting a registration form entitled, USEPA RCRA Subtitle C Site Identification Form (EPA Form 8700-12). The RCRA Subtitle C Reporting Instructions and Forms are available at: <https://www.epa.gov/hwgenerators/how-hazardous-waste-generators-transporters-and-treatment-storage-and-disposal>



No fee is required to obtain an EPA ID Number. However, a small service charge of \$30 is assessed annually for an active EPA ID number.

9 Ewing Street
Mail Code 09-01
P.O. Box 420
Trenton, NJ 08625-0420
Attn: Licensing and Registration
(609) 292-7081

EPA ID Number

The length of the instruction booklet may be intimidating, as it is designed for various types of hazardous waste (HW) generators. Please note that most of the instructions contained in the 125-page booklet are not applicable to LQHs. The Site Identification Form is only 5 pages. Please complete Sections 1-19, which are on Pages 113-118 of the document.

Please contact DEP's Bureau of Licensing and Registration at 609-292-7081 for more information and/or questions about completing the form.

Completed Site Identification Forms should be submitted to the NJDEP at the address below:

NJDEP
Bureau of Licensing and Registration

Please note: The E-waste regulations at N.J.A.C. 7:26A-13.11(b) require ALL E-waste collection sites (irrespective of their designation SQH/LQH) to manage the collected CEDs at their sites in accordance with the management standards specified for SQH and LQH at N.J.A.C. 7:26A-7.4 and 7.5.

Hazardous Waste OR Universal Waste? Why the difference?

In order to classify a waste as UW, the waste must first be a Hazardous Waste. According to RCRA regulations at 40 CFR 261.4(b)(1), wastes generated by households are excluded from being hazardous waste. Based on the above, CEDs generated by households are not HW, therefore, not UW. Non-residential CEDs do not meet this criterion, therefore those are HW, and if recycled, must be regulated as UW.

Additional Resources

SOLID AND HAZARDOUS WASTE
COMPUTER AND ELECTRONICS
FACT SHEET

<http://www.nj.gov/dep/dshw/lrm/uwaste/uwelfact.htm>

SOLID AND HAZARDOUS WASTE
MANAGEMENT OF CONSUMER
ELECTRONICS
UNDER THE UNIVERSAL WASTE
RULE IN NEW JERSEY

<http://www.nj.gov/dep/dshw/lrm/uwaste/uwelectr.htm>