

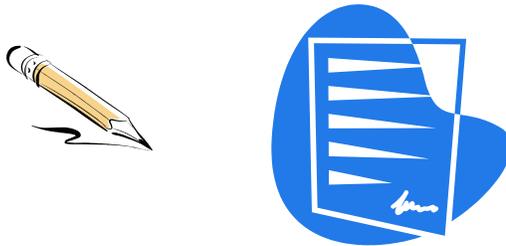
CHECKLIST

Selecting an Electronics Recycling Service Provider

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P.O. Box 7921
Madison, WI 53707-7921



Electronics have been described as anything with an electrical cord or a circuit board. This checklist deals primarily with electronic wastes such as computers, computer accessories and peripherals, televisions and cell phones.

This checklist is a guide for generators of waste electronics to assist in the selection of a recycler. The checklist covers the full range of recycling services (e.g., transport, repair, demanufacturing, processing and asset recovery) and addresses a broad spectrum of concerns that generators may have, including questions regarding the range of services provided, liability insurance coverage and financial assurance, environmental management systems, documentation and other client concerns.

Each generator has different needs and concerns, so this checklist is intended to aid in selecting recycling service providers based on the particular needs of the generator. For example, a large business may seek a single recycling service provider for all services, including demanufacturing and processing of potentially hazardous materials contained in its waste electronics. On the other hand, a smaller business or a household may seek a reliable recycler that will handle only a portion of the recycling service, such as transporting the waste electronics to a processor or demanufacturer.

This guide:

- provides a structured approach and a starting point for information gathering;
- raises issues to consider and to settle within your own organization before approaching potential recyclers;
- is an educational tool for your own organization and for recyclers that promotes awareness of the potential adverse environmental impacts of waste electronics as well as their possible 'improper' ultimate fate, such as overseas dumping;
- sends a message to recyclers that their customers demand environmental responsibility and accountability; and
- provides a structure for documentation of your efforts to find a suitable recycler.

CHECKLIST

A. GENERAL QUESTIONS TO ASK: In selecting an electronics recycler, you will want to obtain some basic information about the service provider, regardless of its size of operation.

<p>1) Does the service provider accept the products you want recycled? Depending on the type of your electronics, a service provider may or may not be able to accept and handle your materials.</p>	Yes	No
<p>2) Does the service provider serve your geographic area or type of organization? Some service providers operate on a national scale and accept both public and private sector customers. Other providers may be regional in orientation or limit their services to specific types of customers; e.g., large corporations.</p>	Yes	No
<p>3) Can the service provider describe its fees for various types of equipment? Facilities may have different fee levels for various electronics. Fees may be set on a per pound or per product basis, and may or may not include collection or transportation. In general, you should see if:</p> <ul style="list-style-type: none"> ▪ fees proposed by the service provider are within your budget; and ▪ fees proposed compare with fees charged by other service providers and past fee proposals. 	Yes	No
<p>4) Can the service provider give a general description of its business? This type of information may include:</p> <ul style="list-style-type: none"> ▪ point of contact; ▪ number of employees; ▪ years in business and ownership history; ▪ facility site information and history; and ▪ summary of operations and services offered. <p>A qualifications statement would be an adequate alternative to requesting individual types of information. You may also wish to ask about quantity of product recycled, but the value of this type of information can be questionable.</p>	Yes	No

<p>5) Can the service provider offer the services that you require? You may need value-added services that may not be available from every recycler. Examples of value-added services may include:</p> <ul style="list-style-type: none"> ▪ on-site collection support; ▪ transportation support; ▪ one day event / municipal collection; ▪ product reuse or refurbishment; ▪ hard drive erasure for computers; ▪ product tracking through final disposition; and ▪ recycling guarantee or certificate. 	Yes	No
<p>6) Can the service provider provide a list of references, including the most recent and related clients they have provided service for? It is important to obtain a list of the organizations that the service provider has most recently provided service to, including contact information.</p>	Yes	No

B. AUTHORIZATIONS: The service provider must have appropriate federal, state and local approvals under laws that safeguard occupational and environmental health and safety. The need for regulatory approvals and licenses depends on the level and type of services provided. Some approvals and licenses listed here may not apply to your service provider.

Note: The following websites provide information relevant to these questions:
 WDNR list of licensed facilities (<http://dnr.wi.gov/topic/waste/licenses.html>).
 WDOT transportation requirements (http://docs.legis.wi.gov/code/admin_code/trans/326/01)
 US DOT Office of Hazardous Materials Safety (<http://www.phmsa.dot.gov/>).
 EPA compliance history (www.epa.gov/epahome/wherelive.htm#databases)

<p>1) Does the service provider have an EPA ID number? An EPA ID number is not a permit or a certification and does not certify electronics recyclers. For example, a company that has an EPA ID number is not an “EPA approved” recycler. An EPA ID number only indicates that the company has registered with EPA as a waste generator. Not all recyclers are required to have an EPA ID number; however, recyclers that handle over 5,000 kg of waste electronics are likely to need one.</p>	Yes	No
<p>2) Is the service provider willing and able to provide information on its environmental compliance history? This type of information is also available from the state regulatory agency or the federal EPA regional contact for solid and hazardous waste, wastewater or air compliance. Examples of information to look for may include:</p> <ul style="list-style-type: none"> ▪ summary of federal, Wisconsin DNR or other governmental agency inquiries during the past three years; ▪ copies of compliance inspection reports; and ▪ relevant reports to government agencies from the past three years. 	Yes	No
<p>3) Is the service provider able to provide evidence of proper licenses, if required? There are several environmental or business/operations oriented licenses a service provider</p>	Yes	No

<p>may need to obtain. License/permit requirements vary from state to state. Since many local recyclers work with out-of-state businesses, it is important to confirm that all downstream facilities are in compliance with individual state requirements. The size and scope of the services provided will affect the type of licenses/permits providers should obtain. Examples of state and local requirements a service provider may be subject to in Wisconsin include:</p> <ul style="list-style-type: none"> ▪ air permits -- the air pollution control program issues several types of permits including construction (ch. NR 406, Wis. Adm. Code) and operating (ch. NR 407, Wis. Adm. Code) permits; ▪ storm water permit -- the types of facilities required to obtain storm water permits are described in subch. I of ch. NR 216, Wis. Adm. Code; ▪ solid waste licenses -- service providers may be subject to storage facility (s. NR 502.06, Wis. Adm. Code), transfer facility (s. NR 502.07, Wis. Adm. Code), or processing facility (s. NR 502.08, Wis. Adm. Code) licenses; ▪ transportation licenses -- depending on the types of wastes hauled, a service provider may be required to obtain a solid waste (s. NR 502.06, Wis. Adm. Code) or hazardous waste (ch. NR 620, Wis. Adm. Code) transportation license; ▪ hazardous waste storage license -- this license may be required for facilities that manage certain types of hazardous and universal wastes prior to recycling (ch. NR 680, Wis. Adm. Code); ▪ local business permits; ▪ local zoning permits; and ▪ Wisconsin and US DOT requirements. <p>Not every recycler is required to have every type of permit or license; however, they are often able to provide documentation why certain permits or licenses are not needed.</p>		
<p>4) Can the service provider identify its federal, state, and local environmental agency contacts? A service provider can often identify who it contacts for issues related to:</p> <ul style="list-style-type: none"> ▪ RCRA/hazardous waste; ▪ air; ▪ water; ▪ solid waste; and ▪ health and safety. 	Yes	No
<p>5) Can the service provider provide evidence of an environmental management system, an environmental risk management plan or electronics recycling certification? A certifiable environmental management system (EMS) is not a guarantee of high environmental standards. Service providers that demanufacture may have a greater need for an EMS, while smaller companies may find a certified EMS system is cost prohibitive. Examples of certifiable systems are:</p> <ul style="list-style-type: none"> ▪ ISO 14001; ▪ EMAS (European Eco-Management and Audit Scheme); and ▪ IAER (International Association of Electronic Recyclers) certification program. <p>Companies that do not have a certifiable system should have some sort of internal documented environmental and risk management policy.</p>	Yes	No
<p>6) Does the service provider comply with all applicable United States and Wisconsin Dept. of Transportation hazardous material regulations, including, but not limited to, packaging, labeling, marking and posting requirements?</p>	Yes	No

<p>7) Does the service provider have a hazardous materials management plan? A service provider should have an operating plan in place that will ensure that all hazardous constituents are managed and ultimately recycled in a manner that protects human health and prevents releases of hazardous constituents into the environment.</p>	Yes	No
<p>8) Does the service provider have a hazardous material emergency release plan (in case of a spill)?</p>	Yes	No
<p>9) Does the service provider meet its OSHA or Wisconsin Department of Commerce Public Employee Safety and Health (ch. COMM 32, Wis. Adm. Code) requirements? Occupational health and safety in the private sector is monitored by OSHA or the Wisconsin Department of Commerce at federal and state government facilities. OSHA requirements will vary between facilities. The service provider should be able to provide evidence that it is meeting several universal OSHA requirements. A training mandate is also a good sign that the service provider is meeting its OSHA requirements. The service provider should also be able to provide the following:</p> <ul style="list-style-type: none"> ▪ list of applicable OSHA requirements (http://www.osha.gov/); ▪ list of applicable COMM 32 requirements; (http://docs.legis.wisconsin.gov/code/admin_code/sps/safety_and_buildings_and_environment/326_360/332); ▪ summary of any OSHA / COMM 32 investigations for the past 3 years, including health hazard evaluations; ▪ full OSHA and/or COMM 32 citation history; and ▪ training records and written programs required by OSHA / COMM 32. 	Yes	No
<p>10) Does the service provider perform regular environmental, health and safety audits? Regular audits indicate a proactive effort by the service provider to address and avoid environmental, health, and safety concerns.</p>	Yes	No
<p>11) Is there a trained employee who is responsible for Environment Health and Safety on site? A person who is responsible for EHS will often perform informal and formal inspections, procure needed safety equipment, and address EHS reporting requirements.</p>	Yes	No
<p>12) Does the service provider have an emergency prevention, preparedness and response plan? A service provider should have a plan for identifying potential emergency situations and specifying proper responses to those situations. A documented emergency prevention, preparedness and response plan will often include procedures for:</p> <ul style="list-style-type: none"> ▪ evacuation; ▪ fires; ▪ explosions; and ▪ chemical releases. 	Yes	No
<p>13) Does the service provider have an employee training program for environment and health and safety? An employee training program helps ensure employee awareness and competence regarding environmental and health safety issues. Training requirements will vary depending on job title and description.</p>	Yes	No

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C. DOCUMENTATION: The recovery service provider must perform due diligence and have documentation regarding end-use markets.

If the service provider does not perform any of the tasks outlined below, it should be able to identify and provide documentation for the downstream market, facility or service provider.

<p>1) Can the service provider provide a detailed description of its processes? A service provider should be able to provide an overview of its procedures for:</p> <ul style="list-style-type: none"> ▪ demanufacturing; ▪ reuse/resale/donations; ▪ secure destruction; ▪ disposal and waste handling; ▪ products manufactured; and ▪ storage. 	Yes	No
<p>2) What does the service provider do with the electronic equipment it receives?</p> <ul style="list-style-type: none"> ▪ Refurbish equipment for use by another user ▪ Demanufacture equipment and sell components & parts ▪ Send materials to a metals reclamation plant or smelter ▪ Process the plastic, metal and glass, and ship these to other companies for use in production of recycled products ▪ Landfill or incinerate unmarketable material classified as non-hazardous ▪ Subcontract the work to another facility <p>A service provider should be able to provide a narrative or flow chart of each of the above processes upon request.</p>		
<p>3) Does the service provider have a complete list of end-markets for materials? The service provider should be able to state where it sends commodity materials or product streams including:</p> <ul style="list-style-type: none"> ▪ circuit boards; ▪ hazardous materials; ▪ CRTs; ▪ batteries; and ▪ mercury containing devices. 	Yes	No
<p>4) Does the service provider audit its end-markets either via audit, questionnaire or other measures? Smaller recyclers may not have the ability to perform an on-site audit of its end markets. However, recyclers should be able to evidence some level of information regarding its end markets. In general, the facility should be maintaining records or documentation showing that materials are being properly managed by its end markets.</p>	Yes	No
<p>5) How much of equipment received (CONTAINING HAZARDOUS ELEMENTS) does the service provider send for disposal in landfills or for incineration?</p> <p>Electronics contain hazardous constituents. Television and computer CRTs have significant amounts of lead, chromium, nickel and zinc. Printed circuit boards contain small amounts of cadmium, nickel and other heavy metals.</p>	%	

<p>6) If non-hazardous materials are landfilled or incinerated, ask the questions below:</p> <ul style="list-style-type: none"> ▪ What materials are landfilled or incinerated? ▪ What percentage of equipment received is landfilled? ▪ What percentage of equipment received is incinerated <u>with</u> energy recovery? ▪ What percentage of equipment received is incinerated <u>without</u> energy recovery? 		
<p>7) Does the service provider process, sort or technically assess items domestically? It is generally recognized that some secondary materials must be recycled overseas, and legitimate foreign recycling markets for end-of-life electronics exist. But, if products are not processed, sorted or technically assessed domestically, this is an indication that further investigation is necessary.</p>	Yes	No
<p>8) If you donate your electronics, can the service provider supply you with documentation so that you may be able to deduct it from your federal tax return?</p>	Yes	No
<p>9) Can the service provider provide a complete inventory of equipment sent to be reused or recycled, including property tags or serial numbers? Does it provide a certificate indicating when material was received and how it was processed? This information is important for tax records and for any potential liability claims (i.e., discarded electronics found illegally disposed in a solid waste landfill or in an uncontrolled export market.)</p>	Yes	No
<p>10) Can the service provider provide evidence of appropriate shipping papers for exported materials of concern sent to domestic and export markets? Appropriate shipping papers provide evidence that exported materials have undergone some level of proper labeling, sorting and manifesting. Examples of such documents may include: bills of lading, export packing lists, import permits or customs manifests. Materials of concern include: circuit boards, hazardous materials, CRTs, batteries and mercury containing devices.</p>	Yes	No
<p>11) Can the service provider give information on brokers and subcontractor practices and procedures? Often service providers have a broker or subcontractor handle specific or several different types of material. If so, ask that the service provider provide the same type of due-diligence on the practices of the broker or subcontractor as it has for any end-markets it may use.</p>	Yes	No
<p>12) Does the service provider export (or broker for export) used equipment? If YES, can it provide evidence of due diligence similar to that for domestic markets, that all materials are legally exported and are in compliance with all national and international laws? Some companies export scrap material to less-developed countries where lower labor costs contribute to lower processing costs. However, the receiving country may also have less protective environmental standards. In addition, companies that export may need to comply with applicable international laws and agreements</p>	Yes	No

for the export of hazardous materials found in electronics.		
13) Does the service provider audit its downstream vendors? (Information on how to conduct an audit is available on the Product Stewardship Institute web page: www.productstewardship.us . See the “Electronics” section.	Yes	No
14) Does the service provider sub-contract with prison-based industries to demanufacture or recycle materials received? The federal and several state prison systems have established electronic recycling centers where inmates receive training in equipment demanufacture and refurbishment and learn on-the-job skills. The decision of whether or not it is important to know if prison-based industries are being used is a value-choice of individual companies. Some companies may wish to support inmate training, whereas others may have issues with the use of prison labor.	Yes	No

D. CLIENT CONCERNS

1) Is the service provider willing to adapt its processes to accommodate client concerns? Ultimately, you must feel comfortable with the recycling process and end markets used by the facility. If there are concerns that you want addressed, the company should adapt its processes to meet your needs. Examples of concerns include: <ul style="list-style-type: none"> • emphasis on reuse; • exporting to less-developed countries; and • providing good quality affordable computer equipment for low-income or non profits. 	Yes	No
2) Can the service provider provide certification that all previous data has been cleansed from hard drives, thus averting data security risks?	Yes	No

E. LIABILITY INSURANCE AND FINANCIAL ASSURANCE: The service provider must have appropriate mechanisms to ensure the proper closing of the service consistent with environmental standards.

1) Can the service provider provide evidence of general liability insurance for pollutant releases, accidents, and other emergencies? How much coverage? The service provider should be able to provide a schedule or copy of its insurance policy and indicate the amount of insurance coverage it has.	Yes	No
2) Can the service provider provide evidence of environmental liability protection? The service provider should be able to provide a schedule or copy of its insurance policy and indicate the amount of insurance coverage it has.	Yes	No

3) Can the service provider provide evidence of other types of relevant insurance? The service provider should be able to provide a schedule or copy of its insurance policy and indicate the amount of insurance coverage it has.	Yes	No
4) Can the service provider show that it meets any additional requirements pursuant to state or local regulations and laws? Individual states and localities may have insurance requirements that are unique to that jurisdiction.	Yes	No
5) Does the service provider have financial assurance; e.g., bonding? Depending on the size and scope of the service provider, this question may not be applicable to all recovery facilities.	Yes	No
6) Is the service provider able to provide evidence of compliance with the data destruction and privacy requirements of HIPAA (Health Insurance Portability and Accountability Act)? The demand for reliable data destruction is increasing due to increased federal and state requirements to protect privacy and general concerns to limit identity theft. www.hhs.gov/ocr/hipaa	Yes	No

F. DISCLOSURE VERIFICATION

1) Can the service provider verify that its responses to your questions are accurate through an independent verification process or through documentation?	Yes	No
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This Checklist was completed regarding _____
(Facility Name)

by _____ on _____.
(Name) (Date)

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