



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Wisconsin Automotive Parts Association
Laurie Hansen
5330 Wall St., Ste 100
Madison, WI 53718

Dear Laurie:

The Wisconsin Department of Natural Resources (DNR) has identified three environmental issues that require your attention and possible action. These issues are:

- retailers' obligations regarding collection of and deposits for lead acid batteries;
- used oil collection and sign posting requirements; and
- recommendations for fluorescent bulb management.

We appreciate your careful review of this letter, as it serves as a reminder of multiple legal obligations and clarifies the proper management of fluorescent bulbs. This letter has been sent to retailers around the state, and I encourage you to share this information with your members and retailers you work with.

Lead Acid Battery Collection and Deposits

- Wisconsin law prohibits the disposal in landfills or burning of lead acid batteries (s. 287.07 (1m) (a) and (am), Wis. Stats.). Lead acid batteries contain toxic heavy metals and corrosive acid. They require proper handling and disposal to protect human health and the environment.
- Wisconsin battery retailers are required to accept used batteries with the sale of a new battery. Retailers may charge a deposit of no more than \$5.00 on the sale of a lead acid battery; however, the battery deposit must be refunded if the consumer delivers the used battery back to the retailer for recycling (s. 287.18(5), Wis. Stats.). Retailers may require proof of purchase to do this.
- Waste lead acid batteries are conditionally exempt from the Wisconsin hazardous waste rules if they are safely stored and managed while being collected, and are sent off site for reclamation. For details, consult s. NR 666.080, Wis. Adm. Code, Spent Lead Acid Batteries Sent for Reclamation www.legis.state.wi.us/rsb/code/nr/nr666.pdf or ch. NR 673, Universal Waste Rules www.legis.state.wi.us/rsb/code/nr/nr673.pdf.

Used Oil Collection and Sign Posting

- Wisconsin law prohibits the disposal of used oil in landfills or burning used oil without energy recovery (s. 287.07 (1m) (b), Wis. Stats.). Used oil is insoluble, persistent and can contain toxic chemicals and heavy metals. It requires proper handling and disposal to protect human health and the environment.
- Retailers selling automotive oil must accept consumer used oil or must post a sign at the location of sale indicating the location and hours of operation of the nearest consumer used oil collection facility, s. 287.15(2)(a), Wis. Stats.

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- Retailers may request signs from DNR to comply with the used oil sign-posting requirement. Please request the *IE-100 Recycle Used Oil* sign by sending an e-mail with your name and mailing address to lindsey.r.miller@wisconsin.gov or by calling 608.266.2111.
- Wisconsin law provides reduced regulatory requirements for managing used oil that is recycled. Those requirements are in the Used Oil Management Standards in ch. NR 679, Wis. Adm. Code, www.legis.state.wi.us/rsb/code/nr/nr679.pdf.

Proper Management of Fluorescent Bulbs

Both conventional and “green” fluorescent bulbs, including compact fluorescents, can contain mercury and sometimes lead. While some of these may not be hazardous waste according to Wisconsin law, DNR strongly recommends recycling over landfill disposal. This is despite manufacturer claims that these can be safely disposed of in a landfill. Mercury, even at very low levels, can become airborne and harm our environment.

Please instruct all customers (business and private) to recycle used fluorescent bulbs. Most community household hazardous waste collection programs (e.g., “Clean Sweeps”) accept these.

For additional information, please consult:

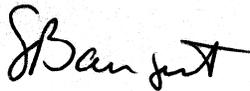
- The DNR Web page on “Fluorescent and Other Light Bulbs”
<http://dnr.wi.gov/topic/Recycling/bulbs.html>
- *Management of “Green” Fluorescent Bulbs*
<http://dnr.wi.gov/files/pdf/pubs/wa/wa653.pdf>
- *Mercury and energy efficient lighting*
<http://www.focusonenergy.com/print/Residential/Lighting/cfls.html>

Thank you for reviewing these important issues and for your efforts to help us protect Wisconsin’s citizens and environment from these hazardous materials. Please be aware and remind retailers you work with that any unfulfilled legal obligations must be quickly met, and that violations are subject to penalties of up to \$1,000 per violation.

If you have any questions regarding this information, please contact your local DNR Waste Management Specialist. Contacts are listed by county at <http://dnr.wi.gov/org/aw/wm/contacts/regions.htm>.

Thank you for doing your part to ensure a clean and healthy Wisconsin for future generations.

Sincerely,



Suzanne Bangert, Director
Waste and Materials Management Program

Cc: (electronic)

DNR Regional Supervisors, Waste & Materials Management Program
Steve Sisbach and Dan Graff, LE/5
Responsible Unit contacts