

Overview of E-Cycle WI Compliance Efforts



Wisconsin stakeholder meeting

June 1, 2016

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Compliance tools

- Online registration and reporting
- Desktop reviews of records and registration materials
- Conduct inspections of registered program participants
- Cost sharing audits (has not been used to date)
- Educate collectors on how to spot potential problem recyclers



Reporting forms

- Collectors, recyclers and manufacturers submit annual reports
- Totals must match between collectors and recyclers and recyclers and manufacturers
- Recycler-to-recycler sales of “paper pounds” tracked and verified
- System does the math—no double allocation or overallocation of pounds

Weight verification

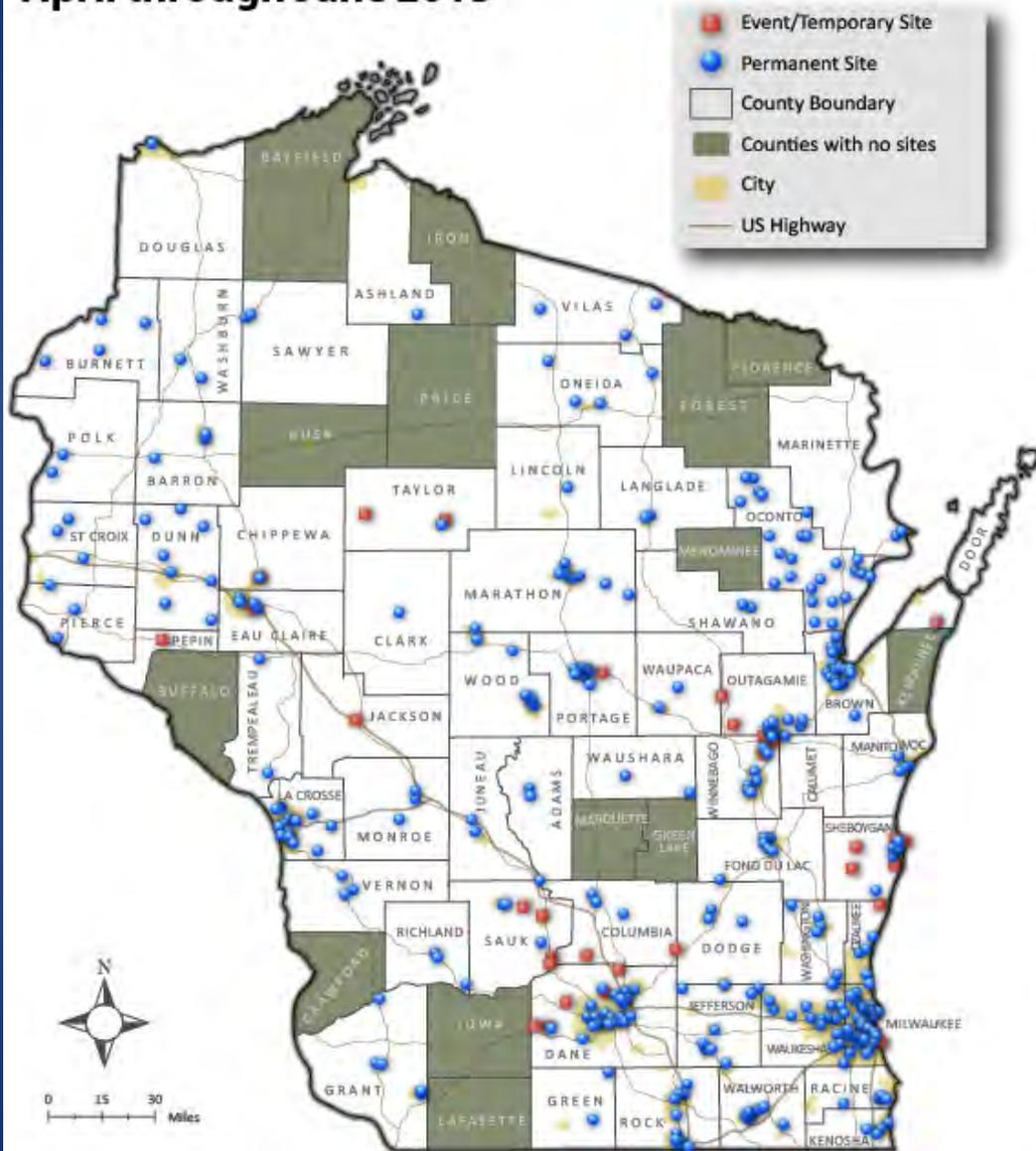
Recycler Name	Collector Name	Recycler Urban Counties Amount	Collector Urban Counties Amount	Recycler Rural Counties Amount	Collector Rural Counties Amount	Recycler Total	Collector Total
Recycler A	Collector 1	19,768.00		32,919.00		52,687.00	
	Collector 2	38,133.00	104,186.00	0.00	0.00	38,133.00	104,186.00
	Collector 3	12,265.00	12,265.00	0.00	0.00	12,265.00	12,265.00
	Collector 4	42,319.00	61,251.00	0.00	0.00	42,319.00	61,251.00
	Collector 5	48,869.00	48,869.00	0.00	0.00	48,869.00	48,869.00
	Collector 6	6,235.00	11,181.00	0.00	0.00	6,235.00	11,181.00
	Collector 7	151,360.00	151,360.00	0.00	0.00	151,360.00	151,360.00
	Collector 8	9,765.00	13,886.00	0.00	0.00	9,765.00	13,886.00
	Collector 9	20,040.00	25,883.00	0.00	0.00	20,040.00	25,883.00
	Collector 10	0.00	0.00	28,317.00	28,317.00	28,317.00	28,317.00
	Collector 11	68,456.00	102,922.00	0.00	0.00	68,456.00	102,922.00
	Collector 12	19,060.00	19,060.00	0.00	0.00	19,060.00	19,060.00
	Collector 13	6,351.00	6,351.00	0.00	0.00	6,351.00	6,351.00
	Collector 14	6,743.00	6,743.00	0.00	0.00	6,743.00	6,743.00
	Collector 15	0.00	0.00	21,744.00	21,744.00	21,744.00	21,744.00
	Collector 16	181,533.00	217,941.00	0.00	0.00	181,533.00	217,941.00
Recycler B	Collector 1	57,737.00	57,737.00	0.00	0.00	57,737.00	57,737.00
	Collector 2	61,316.00	61,316.00	0.00	0.00	61,316.00	61,316.00

Inspection program

- 146 registered collectors
 - 388 collection sites (random inspections)
 - approximately 25-30 per year
 - July 1, 2012- June 30, 2014 - focused inspection period
 - 181 site inspections
 - met with nearly every collector
- 20 registered recyclers
 - 6 in Wisconsin (annual inspections)
 - 6 in Illinois (random inspections as travel allows)
 - Desktop audits may be conducted for other out-of-state recyclers

Registered E-Cycle Wisconsin collection sites

April through June 2015



Collector inspection

- Record review
 - Recycler or other downstream vendor
 - Weight records for EEDs
 - Tracking of materials
- Ensure materials are being handled appropriately
- Proper storage
- Site cleanliness





Recycler inspection

- Verify financial responsibility is adequate
- Review contingency plan
- Evaluate accuracy of records
 - random sampling of bills of lading, manifests, etc.
 - determine how materials are recorded
 - EEDs vs. non-EEDs
 - other state programs
 - mass balance

Challenges of tracking electronics

- Tracking components downstream is very difficult and time-consuming
 - Large quantity of materials
 - Crossing state lines
 - Downstream vendors don't always give information easily – confidentiality or payment disputes
- Questions about locations of CRT glass
- Collectors often have poor tracking methods
- Reliance on recyclers' recordkeeping

Most common problems

- Failure to submit annual report or registration
- Failure to provide records for downstream vendors
- Failure to maintain pollution liability insurance or financial assurance
- Failure to comply with environmental laws



Enforcement

- Notices of non-compliance
- Suspension from program
 - Removed from E-Cycle WI list
 - No materials collected during suspension period can count for manufacturer credit
 - Other stakeholders are notified (email or personal call in certain circumstances)
 - If issues are resolved, reinstatement occurs



More severe consequences

- Revocation
 - occurs after a 60-day suspension period if issues have not been resolved
 - gets warning letter 15 days prior – final reminder
 - cannot be reinstated until the following program year (July 1) and only if all issues have been resolved
- If violations are severe (such as hazardous waste, fraud, etc.) additional enforcement actions may be pursued