

What to Expect When You're Inspected:

A guide for E-Cycle Wisconsin registered collectors

What is the purpose of an inspection?

DNR staff conduct routine inspections of registered E-Cycle Wisconsin collectors to make sure that they are following program requirements and to see that sites are operating in an environmentally sound manner. Inspections are intended to be a learning opportunity to help you manage your site in the best way possible. Feel free to ask your inspector for advice on how to store electronics on your particular site or for recommendations on record-keeping. The primary intent of an inspection is to improve your site.

How will I know that I'm being inspected?

A DNR inspector will typically call the primary contact for a collection site in advance to schedule an inspection. This will give you time to gather all of the records the inspector will be looking for (see below) and ensure that others involved in your operation can be present if they want. It also gives you time to think of any questions you would like to ask an inspector. Unannounced inspections are possible, but inspections tend to be more productive when scheduled in advance.

What is the inspector looking for?

Records

You are expected to have records that show the total weight of eligible electronic devices (EEDs) you collected and the name(s) of recyclers or other downstream vendors that received the electronics. These records should show how EEDs are kept separate from non-EEDs. They should also show how materials are tracked if your site receives materials from both urban and rural counties. You must keep records for three years and will need to have them available for the inspector.

Processing

The inspector will check to see that only whole, intact EEDs are being counted under the program. Registered E-Cycle Wisconsin collectors may not process or disassemble any electronics that are counted toward manufacturer targets. "Disassembly" includes removing parts of electronics, clipping cords, and removing batteries or toner cartridges. The only exception to this rule is if your recycler has asked you to do some small disassembly for safety or packaging reasons and you are still sending everything to the recycler.

If you are processing electronics that will not be counted towards manufacturer targets, the inspector will check to see that you are following applicable laws.

Storage

The inspector will check to see that you are storing broken cathode ray tubes properly, since they are considered hazardous waste. Broken CRTs must be stored in a building with a roof, floor and walls and placed in a closed container that is designed to minimize releases of CRT glass to the environment. An inspector will look to see that containers of used broken CRTs are labeled with the following three items: the date the container was first put into use, "Waste Cathode Ray Tubes – Contains Leaded Glass" and "Do Not Mix with Other Materials."

The inspector will also be looking to see if electronics are stored in a manner that protects them from weather, theft and vandalism. Ideally, all electronics will be stored indoors or in a covered container. All containers with electronics in them should be labeled with the primary electronic devices they contain (i.e., computers, printers, keyboards, mixed electronics) and the date the first electronic device was put in the container.

Containers should be sturdy and positioned to provide adequate space for people to move around them safely. Electronics and containers should not be stacked precariously high or appear unstable. The inspector should be able to read all labels.

Site cleanliness

The inspector will check for litter, wind-blown materials, broken materials and spills. The DNR's expectation is that E-Cycle Wisconsin collection sites will be clean and that all broken materials or spills will be cleaned up immediately.

What happens after an inspection?

As the inspector walks through your site and looks over your records, he or she will let you know if there are any problems or concerns. At the end of the inspection, the inspector will summarize his or her findings and discuss with you how you should proceed with managing any problems.

A week or so following the inspection, you will receive a letter or email confirming your inspection and listing any concerns the inspector had. If the inspector feels you need to make changes, the letter will outline the steps you need to take to improve your site and will list any materials you will need to provide to the DNR, such as pictures of the improvements you made or records that were missing at the time of inspection. If the inspector has asked for follow-up actions, he or she will send an email or letter once you have completed all actions required.

If the inspector finds serious problems on your site, you may be suspended from the E-Cycle Wisconsin program until you take corrective actions. However, a suspension would be rare as long as you are cooperating and making the necessary improvements. Again, the primary point of an inspection is to ensure your continued success. We appreciate your participation in the E-Cycle Wisconsin program and hope that your inspection will be helpful to you.

More information

For more information about inspections, call 608-266-2111 or email DNRWae-cycling@wisconsin.gov. If you need more information about managing your site, please see the following publications, available for free at dnr.wi.gov, keyword "e-cycle."

- E-Cycle Wisconsin Collector Frequently Asked Questions (WA-1502)
- Collector Best Management Practices: Electronics (WA-1735)
- Collector Best Management Practices: Universal Waste (WA-1736)



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