

April 12, 2012

DIRECTIVE:	JOB CORPS INFORMATION NOTICE NO. 11-65
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TO: ALL JOB CORPS NATIONAL OFFICE STAFF
ALL JOB CORPS REGIONAL STAFF
ALL JOB CORPS CENTER DIRECTORS
ALL JOB CORPS CENTER OPERATORS
ALL NATIONAL TRAINING AND SUPPORT CONTRACTORS
ALL OUTREACH, ADMISSIONS, AND CTS CONTRACTORS

FROM: EDNA PRIMROSE
National Director
Office of Job Corps

SUBJECT: Managing Hazardous Waste: Cathode Ray Tube (CRT) Monitors

1. Purpose. To inform the Job Corps Community about the federal hazardous waste management and disposal requirements for CRT monitors.
2. Background. Recently, a Job Corps center was cited for improper disposal of CRT monitors and fluorescent light bulbs. The items were left curbside for pick up and transport to the local municipal landfill. CRTs and mercury-containing items such as fluorescent light bulbs should be taken to a licensed recycling and recovery center in accordance with state EPA requirements.

Effective January 29, 2007, Resource Conservation and Recovery Act (RCRA) excludes CRT monitors and glass removed from CRTs from the definition of solid wastes under certain conditions. The change in waste-management rules encourages recycling and reuse of used CRTs and CRT glass.

Job Corps centers are considered conditionally exempt small quantity generators (CESQG). Accumulated quantities of CRTs and glass removed from CRTs should not exceed 100 kilograms (kg) or 220 pounds in one month. Therefore, Job Corps centers shall not dispose of more than four CRT units or glass removed from no more than four CRTs at one time. Episodic generation or one-time accumulation of more than 100kg of waste in one month will be subject to small or large quantity generator requirements. (See <http://www.epa.gov/osw/inforesources/pubs/training/gen05.pdf> for generator status definitions and waste accumulation and disposal requirements.)

Several states have instituted mandatory electronic waste recovery programs. Fine

amounts vary from state to state. Currently, there is no federal mandate to recycle or reuse electronic waste. However, the United States Environmental Protection Agency (EPA) can issue civil penalties up to \$27,500 for each day of non-compliance with RCRA hazardous waste transportation, treatment, storage, disposal, or export requirements. Individuals can face criminal fines up to \$50,000 per day and up to 5 years in prison for RCRA violations.

Individuals knowingly violating RCRA and fully aware that his/her actions place others in imminent danger of death or serious bodily injury face up to \$275,000 in fines 15 years in jail.

Centers in violation of state and/or federal hazardous waste transportation, treatment, storage, disposal, or export regulations are responsible for paying all fines and penalties.

3. Action. In accordance with PRH Chapter 5, Section 5.16, R1, centers shall comply with federal, state, and local regulations regarding the generation, storage, and disposal of hazardous materials, including used CRT monitors and glass removed from CRTs. Job Corps centers shall not dispose of more than four CRT units or glass removed from CRTs per month to in order to maintain CESQG status. Centers exceeding the four-unit limit may be subject to citations and fines. The center is responsible for implementing required corrective actions and payment of fines and penalties.

To ensure proper management of used CRTs and glass removed from CRTs, Job Corps centers shall:

- Store unbroken monitors of similar size together to ensure stable stacking.
- Place intact monitors in a single layer, with no more than four units per pallet.
- Stack monitors face out on pallets to prevent breakage; do not stack face down.
- Place broken CRTs or CRT materials in plastic or metal drums, or sturdy cardboard boxes with plastic liners. No more than four broken units per drum or cardboard box.

Before transporting to a recycling or reuse center, centers shall:

- Shrink-wrap unbroken monitors on the pallet.
- Label pallets with required state EPA CRT labels as well as, center name, date collected and number of units and/or weight of load.
- Secure a tarp over pallets or boxes of CRTs transported in open bed trucks to prevent it from falling off.
- Contact a local recycling or reuse center to pick up the CRTs.

For more information about managing electronics and CRT monitors, see the environmental guidance document, “Waste Computers, Monitors, and Electronics” developed by the Nebraska Department of Environmental Quality. **Note:** “Waste electronics generated from **households** are not regulated as hazardous waste.” This exemption does not apply to Job Corps centers. Waste electronics generated by Job Corps centers are re as hazardous waste. Improper disposal will result in fines.

The following resources have been included to assist centers with management of CRTs:

- U.S. EPA Wastes – Resource Conservation – Common Wastes and Materials-eCycling website,
<http://www.epa.gov/osw/consERVE/materials/ecycling/live.htm>
- U.S. EPA Fact Sheet: Easier Recycling of Cathode Ray Tubes,
<http://www.epa.gov/waste/hazard/recycling/electron/crt-fs06.htm>
- Massachusetts Department of Environmental Protection, Waste & Recycling- Electronics & Cathode Ray Tubes (CRTs),
<http://www.mass.gov/dep/recycle/hazardous/crt.htm>

Addressees are to ensure this Information Notice is distributed to all appropriate staff.

4. Expiration Date. Until superseded.
5. Inquiries. Direct all inquiries to Alejandro Perez at (202) 693-2825 or perez.alejandro@dol.gov.

Attachment

Nebraska Department of Environmental Quality, Environmental Guidance Document, Waste Computers, Monitors, and Electronics