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STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



RUSSELL J. HARDING
DIRECTOR

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TO: All Interested Parties
FROM: Roger Przybysz, Acting Chief, Waste and Hazardous Materials Division
SUBJECT: Regulation of Electronic Wastes

This memorandum clarifies the regulation of electronic waste under Part 111, Hazardous Waste Management, and Part 115, Solid Waste Management, of the Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, (NREPA). Electronic waste (E-Waste) includes computer components, audio-visual equipment, and other home/office equipment (e.g., telephones, fax machines, video games) that contains complex circuitry, circuit boards, or signal processing capability.

Hazardous Waste

E-Waste generated from households and conditionally exempt small quantity generators are exempt from hazardous waste regulation under Part 111 (R 299.9204(2)(a) and R 299.9205(2), respectively).

Two other subcategories of E-Waste are also exempted from regulation as hazardous waste:

- 1) Cathode ray tubes from computers and televisions are categorized as electronic lamps and exempted as a "Universal Waste" provided certain conditions are met. See R 299.9228.
- 2) The box containing the central processing unit of a computer is considered to be an exempted scrap metal provided it contains an economically significant percentage of metal, circuit boards, and other electronics and is being recycled. R 299.9204(1) (p).

Solid Waste

Part 115 of the NREPA regulates all E-Waste generated from a household and all E-Waste otherwise exempted from regulation as a hazardous waste pursuant to Part 111.

In order to allow for the appropriate recycling and reuse of E-Waste, the Michigan Department of Environmental Quality exempts from regulation as solid waste E-Waste that is managed in accordance with certain conditions. The attached Exemption describes those conditions and applies to all persons who collect, store, transport, process, use, or re-sell E-Waste.

Questions or comments relating to the regulation of E-Waste as hazardous waste can be directed to Mr. Jack Schinderle at 517-373-8410. Questions or comments relating to the regulation of E-Waste as solid waste can be directed to Mr. Duane Roskoskey at 517-335-4712.

Attachments