

CALL CENTER QUESTIONS & ANSWERS

RCRA

1. RCRA Regulation of CRTs and Other Computer Electronics

A business is updating its current computer system with newer computer models and is discarding its older computers. Are these materials RCRA hazardous wastes? How are the computers, both monitors and processing units, regulated when sent for disposal?

Color computer monitors containing cathode ray tubes (CRTs) are often RCRA hazardous wastes, but there are no current data suggesting that other pieces of computer equipment, such as processing units, are generally RCRA hazardous wastes. Many color computer monitors contain high amounts of lead in their CRTs, which can make the monitors characteristic hazardous wastes. The average concentration of lead in leachate from colored CRT glass generated through the toxicity characteristic leaching procedure (TCLP) is 22.2 milligrams per liter (mg/l), which is considerably more than the toxicity characteristic (TC) regulatory level of 5 mg/l used to classify a waste as hazardous for lead (40 CFR §261.24). Other hazardous constituents such as mercury, cadmium, and arsenic are sometimes present in CRT glass, but these constituents are usually found in very low concentrations unlikely to exceed TC limits. As stated above, there are no current data suggesting that other non-CRT electronic materials from computers generally exhibit any characteristics of hazardous waste (67 FR 40508, 40510; June 12, 2002). However, generators of solid waste CRTs and other computer equipment who discard these materials are required to

make hazardous waste determinations for these materials by testing them or applying their knowledge per §262.11. If generators dispose of CRTs and other computer equipment that are hazardous wastes, they are subject to all the applicable RCRA requirements when the materials are discarded.