

# **Emergency regulations - Managing CRTs and CRT glass**

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# Emergency Regulation Overview

- *Who is subject to the new requirements in the emergency regulations?*
  - U.W. handlers treat CRT devices and CRTs (e-waste recyclers)
  - U.W. handlers that only accept/accumulate are not subject
    - May not use the expanded disposition options

# Emergency Regulation Overview

- *What expanded disposition options are allowed under the emergency regulations?*
  - CRTs/CRT glass may be recycled by other means than CRT glass manufacturing or smelting
  - Only if recycling options do not exist CRT/CRT glass may be disposed of as hazardous waste

# Emergency Regulation Overview

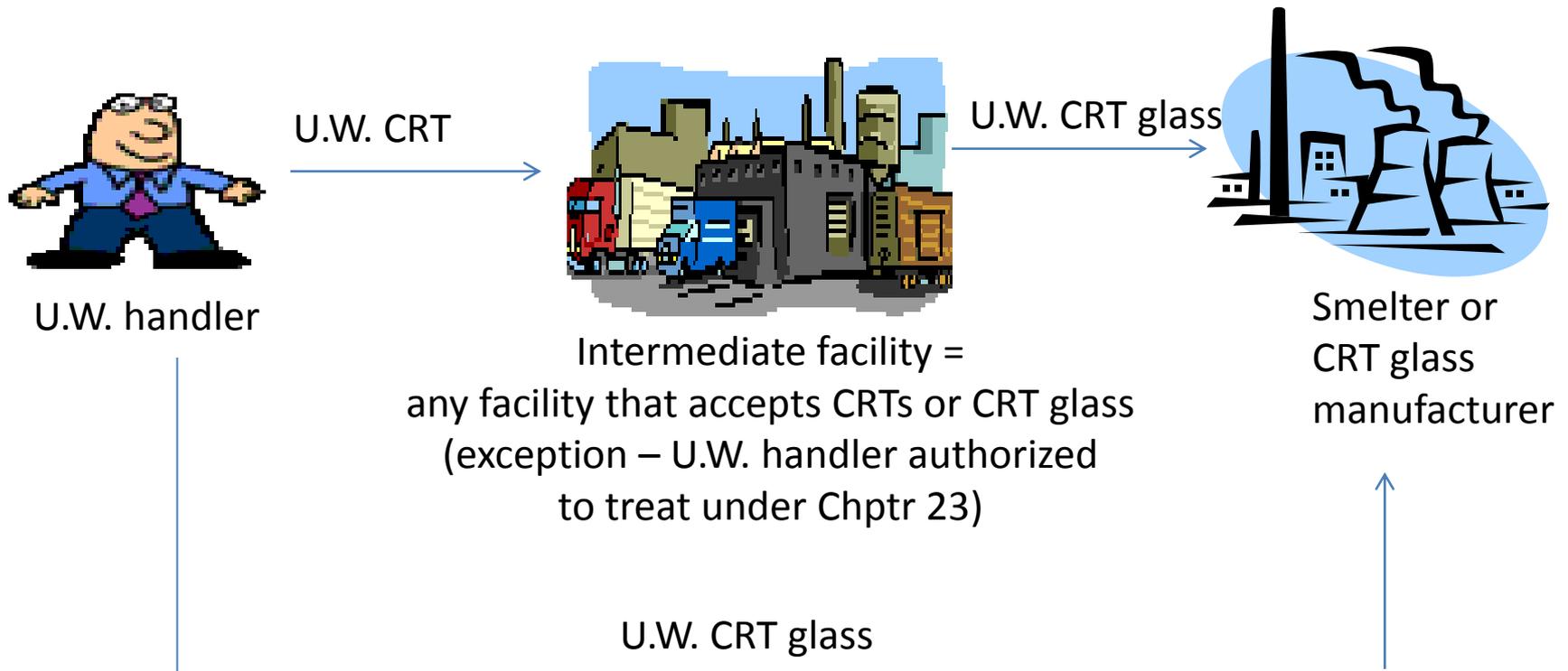
- The key to understanding the new rules:
  - You must know where the CRTs or CRT glass is being sent
  - You must know what will happen to the CRTs or CRT glass

# Emergency Regulation Overview

- *If e-waste recyclers continue to send CRTs or CRT glass for lead smelting or a CRT glass manufacturer, are there additional requirements?*
  - Yes, a contractual arrangement must be established when using an intermediate facility
    - Other documentation must be maintained onsite (e.g., receipts)

# Sending CRTs/CRT glass as U.W.

*To manage and ship as U.W. must meet documentation requirements*



**Documentation** = contractual arrangement (not required when sent directly to CRT glass manufacturer or smelter), transporter & smelter/CRT glass manufacturer info., confirmation receipts

# Emergency Regulation Overview

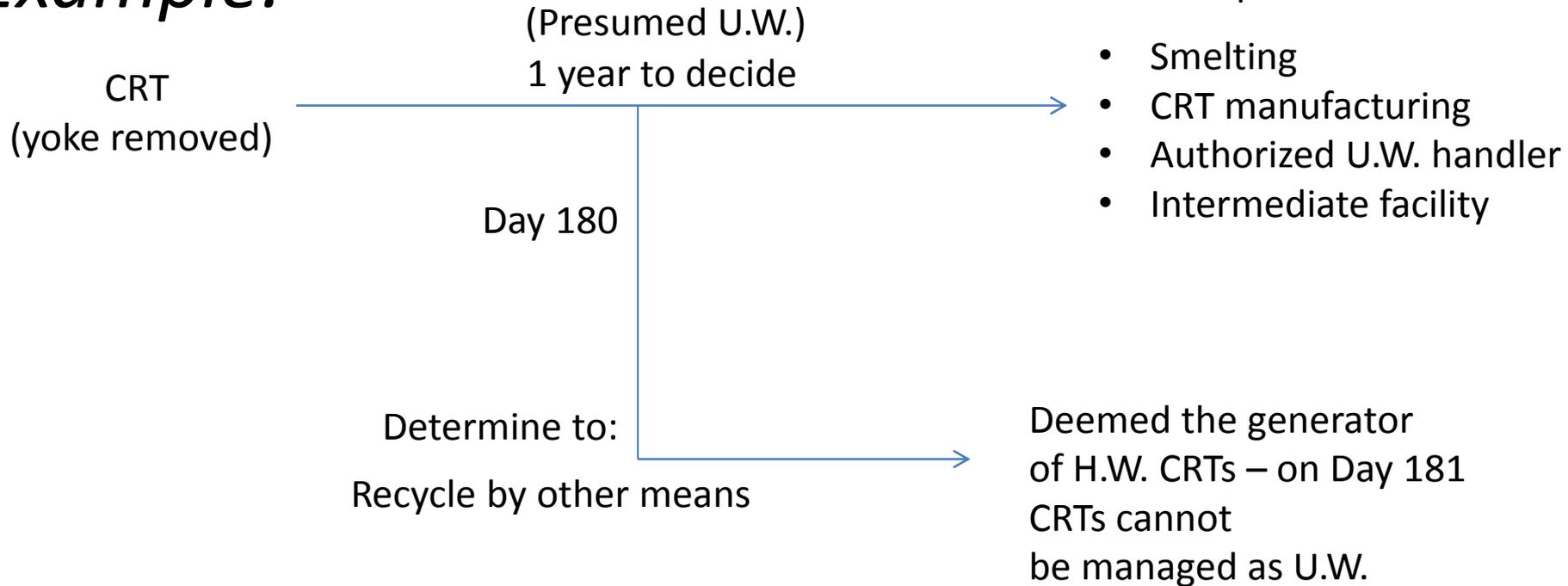
- *Can e-waste recyclers storing CRTs or CRT glass get an extension of their 1 year accumulation time limit to pursue the expanded disposition options?*
  - Yes, minimum of *180 days* to decide upon a disposition option

# Emergency Regulation Overview

- *Are there additional notification requirements for e-waste recyclers that choose to pursue the expanded disposition options?*
  - Yes, must notify DTSC within 15 days of determining to use the expanded options

# Sending CRTs/CRT glass as H.W.

## *Example:*



# Emergency Regulation Overview

- *How are e-waste recyclers regulated if they choose to recycle their CRTs or CRT glass by means other than lead smelting or CRT glass manufacturing?*
  - Like generators of hazardous waste (under Chapter 12)
    - Potential exclusions for use or reuse

# Recyclable materials

- *Is my material excluded from classification as a hazardous waste (Health and Safety Code section 25143.2) ?*

- If yes, it's an excluded recyclable material
- If no, it is fully regulated

[http://www.dtsc.ca.gov/HazardousWaste/upload/HWM FS Generator Requirements.pdf](http://www.dtsc.ca.gov/HazardousWaste/upload/HWM_FS_Generator_Requirements.pdf)

# Recyclable materials

- *Are there management standards for excluded recyclable materials?*
  - Yes, must meet all the conditions for the exclusion and manage in accordance with section 25143.9 and 25143.10.

# Emergency Regulation Overview

- *Can e-waste recyclers seek concurrence from DTSC that their CRTs or CRT glass are excluded recyclable material?*
  - Yes, by submitting an application to DTSC following the requirements in Article 9.
  - But wait, before you submit an application

# Recyclable material?

- Or “recycled material”?
  - “Recycled material” means a material which is used or reused or reclaimed
    - Can choose to obtain concurrence
  - “Recyclable material” means a hazardous waste that is capable of being recycled
    - Recycling letter (with a request for opinion letter)
    - Cannot seek concurrence

# Emergency Regulation Overview

- *How are e-waste recyclers regulated if they choose to dispose of CRTs or CRT glass?*
  - Like generators of hazardous waste
    - Potential exclusion for CRT panel glass

# Emergency Regulation Overview

- **Can e-waste recyclers dispose of certain types of CRT glass in a class II or III landfill?**
  - Yes. “CRT panel glass” may be disposed in a class II or III landfill if the material meets specific waste criteria and management and treatment standards.
  - Whole CRTs and legacy glass cannot qualify.
  - **Guidance coming soon**

# Recyclable material

- *Can “CRT panel glass” be excluded by being recycled instead of disposed in a class II or III landfill?*
  - Yes. However, CRT panel glass cannot be “used in a manner constituting disposal” (e.g., used in a product that is typically placed on the ground)

# Q&A

- **An e-waste recycler** learns of an operation in CA that offers to accept whole (bare) tubes. The downstream operation, is authorized to process CRTs under Chapter 23 and simply states that they process CRTs and prepare the glass for the CRT manufacturing market. Or for “subsequent markets”? What requirements is the e-waste recycler subject to if they send CRTs to the downstream CA operator?
- **An e-waste recycler** learns of an operation in Idaho that offers to accept whole (bare) tubes. The downstream operation simply states that they process CRT tubes and prepare the glass for “subsequent markets”. Can an e-waste recycler send intact bare tubes to the downstream CA operator.

# Q&A

- **An e-waste recycler** learns of an operation in New Mexico that offers to accept whole (bare) tubes. The New Mexico operation states that they separate and sort CRT tubes. Non-leaded panel glass is cleaned in an onsite coating removal system and will be used to “manufacture new glass products.” The funnel glass and leaded panel glass are feedstock to an onsite lead extraction process that sounds a lot like secondary smelting. What requirements is the e-waste recycler subject to if they send CRTs to the downstream CA operator?
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- **An e-waste recycler** separates, sorts, and cleans the coatings off CRT glass at their own facility. The leaded portion is sent to a secondary smelter. The non-leaded portion (<30,000mg/kg) is being solicited by an architectural tile manufacturer within CA. How is the e-waste recycler regulated?
- **An e-waste recycler** separates, sorts, and cleans the coatings off CRT glass at their own facility. The leaded portion is sent to a secondary smelter. The non-leaded portion (<30,000mg/kg) is being solicited by a manufacturer out of state that wishes to incorporate the glass into proprietary concrete blends. How is the e-waste recycler regulated?