

Federal Regulations for Cathode Ray Tubes (CRT)

Global E-Waste Management (GEM) Network
Workshop
July 19, 2013

Agenda

- Overview of Federal Regulations for CRTs
- CRT FAQs and Guidance
- Proposed Changes to Export Provisions

- Used CRTs and CRT glass generally contain hazardous levels of lead and are therefore regulated as RCRA hazardous waste when disposed.
- Used CRTs and CRT glass being recycled are excluded from RCRA hazardous waste regulation, provided certain conditions are met (“CRT regulation,” 40 CFR 261.4(a)(22))
- Used CRTs discarded by households (considered “household hazardous waste”) are exempt under 40 CFR 261.4(b)(1) and do not fall under the CRT regulation.
- CRT exclusion only applies in RCRA-authorized states that have adopted the exclusion and states where EPA administers the RCRA program.

- Three categories of CRTs – used, intact CRTs; used, broken CRTs; and processed CRT glass.
- (1) Used, intact CRTs are excluded as long as they aren't disposed or speculatively accumulated, meaning there must be a feasible means of recycling and at least 75% of the material is recycled or transferred for recycling during the calendar year. Export conditions also apply.
 - (2) Used, broken CRTs must meet storage and management requirements (e.g., stored in a building with a roof, floor, and walls, labeling, speculative accumulation, and can't undergo activities that use temperatures high enough to volatilize lead). Export conditions also apply.

- (3) Processed CRT glass is excluded from hazardous waste regulation if it is sent for recycling to a CRT glass manufacturer or a lead smelter and is not speculatively accumulated.
- In some cases, processed CRT glass may also be excluded from regulation when used as an ingredient or as an effective substitute for a commercial product. (*40 CFR 261.2(e)(1)(i) and (ii)*).
 - A company may wish to consult their state regulatory authority to help determine if the final use for their CRT glass would fit the requirements of the above exclusion.

- In March 2012, EPA proposed the following changes to the export provisions of the CRT rule:
 1. Add a definition of “CRT exporter” to eliminate potential confusion over who is responsible for fulfilling CRT exporter duties, including submitting the export notices.
 2. Require information on additional recyclers in the notice for CRTs exported for recycling to provide more complete information to receiving countries.
 3. Require annual reports from exporters of used CRTs sent for recycling to provide EPA more accurate information on the total quantity of CRTs exported for recycling during a calendar year.

4. Replace the one-time notice for used CRTs exported for reuse with an expanded, periodic notice to improve tracking, and thus better management, of these CRTs.
 5. EPA also requested comment on adding other requirements for used CRTs exported for reuse.
- EPA received five sets of comments from Institute of Scrap Recycling Industries, Inc. (ISRI); Consumer Electronics Association (CEA) and Consumer Electronics Retailers Coalition (CERC); Tennessee Valley Authority (TVA); Basel Action Network (BAN); and Waste Management.
 - Final Rule expected early 2014.

- FAQs - EPA recently published FAQs that provide answers to questions regarding how used CRTs and CRT glass are regulated under RCRA.
- Memos - EPA recently responded to an industry letter clarifying that processed CRT glass may go to a copper smelter under the use/reuse exclusion (40 CFR 261.2(e)).
- FAQs and guidance can be found on EPA's website at: <http://www.epa.gov/osw/hazard/recycling/electron/>
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