

This Electronic Waste Newsletter is being sent using the new Elist System at the Department of Toxic Substances Control (DTSC). Previously information was sent to e-waste stakeholders by email from the electronicwaste mailbox.

Information regarding electronic waste will now be sent to e-waste handlers and recyclers via this Elist delivery system. Those who have not been carried over to the Electronic Waste Elist may subscribe at the following DTSC web page:

<https://dtsc.ca.gov/dtsc-e-lists/>

CALIFORNIA CRT RECYCLERS ARE RESPONSIBLE FOR DOCUMENTING THE FINAL DISPOSITION OF ALL CRTs AND CRT GLASS HANDLED

The Department of Toxic Substances Control (DTSC) is aware of the recent shutdown of some of the last CRT furnaces in Asia. DTSC is issuing this advisory to assist UWED Handlers in understanding the documentation requirements applicable to them, given many handlers are changing their final dispositions of their CRTs and CRT glass in response to the recent furnace closures.

California Code of Regulations, Title 22, Division 4.5, Chapter 23, Article 7 requires CRT recyclers to make hazardous waste determinations for their CRTs and CRT glass. As part of these hazardous waste determinations, handlers must determine the ultimate disposition(s) of their CRTs and CRT glass. Handlers must document these final dispositions.

CRT Glass to Glass Recycling

Prior to the closing of the Asian glass furnaces, most CRT recyclers sent their CRTs and CRT glass to CRT furnaces to be reused in the manufacturing of new CRTs (a.k.a. CRT glass to glass recycling). As has typically occurred in the past, when a handler determines its CRTs and/or CRT glass will undergo CRT glass to glass recycling, the handler can correctly determine that its CRTs and/or CRT glass are hazardous wastes that are eligible to be managed as universal wastes. The handler can then send their CRTs or CRT glass as universal wastes to the CRT glass furnace on a bill of lading. The handler then would maintain the bills of ladings and other documentation showing that the CRT glass furnace received and recycled the handler's CRTs/CRT glass. If the CRT handler sent the CRTs/CRT glass to a CRT glass furnace via an intermediate facility, then the handler would also be required to maintain onsite, and make available to DTSC upon request, appropriate documentation, including a contractual arrangement with the "intermediate facility" and the shipping documents showing the CRTs and/or CRT glass were ultimately sent to, received by, and recycled at the CRT glass furnace.

Lead Smelting

As has sometimes occurred in the past, when a handler determines its CRTs and/or CRT glass will undergo recycling (reclamation) at a lead smelter, the handler can correctly determine that its CRTs and/or CRT glass are hazardous wastes that are eligible to be managed as universal wastes. The handler can then send their CRTs or CRT glass as universal wastes to the lead smelter on a bill of lading. The handler then would maintain the bills of ladings and other documentation showing that the lead smelter received and recycled the handler's CRTs/CRT glass. If the CRT handler sent the CRTs/ CRT glass to a lead smelter via an intermediate facility, then the handler would also be required to maintain onsite, and make available to DTSC upon request, appropriate documentation, including a contractual arrangement with the "intermediate facility" and the shipping documents showing the CRTs and/or CRT glass were ultimately sent to, received by, and recycled at the lead smelter.

Alternative Forms of Recycling

With the worldwide decline in CRT glass to glass recycling, some CRT recyclers and intermediate facilities are pursuing alternative forms of recycling. CRT recyclers who pursue alternative forms of recycling are required to ensure that their CRTs and/or CRT glass qualify for a recycling exclusion pursuant to Health and Safety Code, section 25143.2 (i.e., the handler, in making its hazardous waste determinations for its CRTs and/or CRT glass must ensure the CRTs and CRT glass qualify as excluded recyclable materials (ERMs) and are managed as such). California CRT recyclers who manager their CRTs and/or CRT glass as ERMs must maintain documentation that demonstrates they meet the conditions of the applicable exclusion and must make available such information to DTSC upon request. California CRT recyclers are required to meet these documentation requirements even when sending their CRTs and/or CRT glass to out-of-state or out of country. California CRT recyclers are responsible for ensuring all facilities that handle the CRTs and/or CRT glass as ERMs comply with the ERM requirements.

Disposal

California CRT recyclers may choose to send CRT panel glass for disposal to non-hazardous waste landfills in California and/or may send CRTs and/or CRT glass for hazardous waste disposal to permitted treatment storage disposal facilities (TSDFs). When these final disposition options are selected, the CRT Handler must correctly determine that their CRTs and/or CRT glass are hazardous wastes. The regulations governing these disposal options require the use of a hazardous waste manifest or other hazardous waste tracking documents. The handler must retain these documents onsite for three years to demonstrate the ultimate disposition of the CRTs and/or CRT glass that the handler has disposed to a landfill.

DTSC provides the chart below to summarize the disposition options available to CRT recyclers; the corresponding regulatory status of the CRTs/CRT glass; and the required demonstration documents.

Disposition	Regulatory Statuses	Demonstration Docs.
CRT Glass to Glass Recycling Lead smelting	Universal Wastes	<p>Shipping and receipt documents that verify the CRTs or CRT Glass was received and recycled by the furnace.</p> <p>See: T22, CCR, section 66273.72(b)(4)(F)2, or section 66273.72(c)(3)(E)2 or section 66273.75(f)(6)(B)</p>
Alternative Forms of Recycling	Excluded Recyclable Materials	<p>Documents demonstrating the CRTs or CRT Glass:</p> <ul style="list-style-type: none"> • Will be used as an ingredient in a manufacturing process or as a substitute for a commercial product • Will not be reclaimed or used in a manner constituting disposal <p>See: H&S code, section 25143.2 (b) or (d), section 25143.2 (f), section 25143.9 and section 25143.10</p> <p>See: T22, CCR, sec 66261.2 (g)</p>
Landfill Disposal	Fully Regulated Hazardous Wastes	<ul style="list-style-type: none"> • Hazardous waste manifest • Unless the handler can demonstrate their CRT glass is excluded under T22, CCR, section 66261.4 (h)

Questions about the regulatory status of intermediate facilities or CRT recyclers in foreign countries, including Mexico, should be directed to:

Mr. Robert G. Heiss, Director
International Compliance
Assurance Division MS 2201A
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W. Washington, DC 20460

Please contact Rita Hypnarowski of DTSC at (916) 255-6618 or rita.hypnarowski@dtsc.ca.gov if you have any other concerns or questions regarding this advisory.