Proposed regulatory concepts - Disposition Options for CRTs and CRT glass

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What are the issues?

- California’s universal waste rules provide only two recycling options for CRT glass
  - These options are disappearing
- Confusion about how to determine whether CRT panel glass is hazardous waste
What are the objectives?

- Expand disposition options while promoting recycling
- Establish appropriate management requirements CRT panel glass destined for disposal
- Allow recycling and disposal of CRTs and glass under existing HW rules
- Ensure standards are practical, effective and enforceable
Who is impacted?

- Universal waste handler who treats CRTs and CRT glass including
  - CRT removal (.72(b))
  - Yoke removal (.72(c))
  - CRT processing (e.g. CRT to CRT glass) (.73)
- More disposition options
Disposition Options

- A universal waste handler who determines:
  - The CRTs or CRT glass is destined for disposal (i.e., Class I, II or III landfill)
  - The CRTs or CRT glass is destined for recycling (other than glass to glass or smelting)
Who is not (as) impacted?

- Universal waste handlers that treat CRT devices, CRTs or CRT glass that is sent to:
  - Another universal waste handler (e.g., one who subsequently treats CRTs destined for disposal)
  - A CRT glass manufacturer
  - A primary or secondary lead smelter

- Must ensure the **CRTs** and CRT glass gets to one of these destinations.
What will be covered?

1. H.W. vs. U.W.
2. Management requirements
3. The disposition options
4. Disposal/Recycling
5. Next steps
CRT and CRT glass

Current rules:

- CRT device
- CRT w/yoke
- CRT glass
- CRT glass manufacturer
- Lead smelter
- Hazardous waste universe
- U.W. universe
- CRT w/yoke removed
- Re-use
CRT and CRT glass

Hazardous waste
Subject to Chptr 10-16, 18, 20, 22

Universal Waste
Subject to Chapter 23
<table>
<thead>
<tr>
<th>Hazardous Waste</th>
<th>vs.</th>
<th>Universal Waste</th>
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</thead>
<tbody>
<tr>
<td>90 day limit</td>
<td></td>
<td>1 year limit</td>
</tr>
<tr>
<td>Manifest</td>
<td></td>
<td>Shipping document (e.g., bill of lading)</td>
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<tr>
<td>Biennial Report</td>
<td></td>
<td>Annual report</td>
</tr>
<tr>
<td>Contingency Plan</td>
<td></td>
<td>Response to release</td>
</tr>
<tr>
<td>Generator/disposal fees (if applicable)</td>
<td></td>
<td>Paid to recycle</td>
</tr>
<tr>
<td>Registered H.W. transporter</td>
<td></td>
<td>U.W. transporter</td>
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New requirements (for proposed options)

- Generator of H.W.
  - “any person, by site, whose act or process produces a h.w....”

- Upon determination (other types of recycling or disposal) or within 1 year - fully regulated as h.w.

- Subject to Chptrs 10-16,20,22

- Notification (60 days prior) of destination
Management Options for .72 Recyclers

1. Remove CRTs (.72(b))
2. Removes Yokes (.72(c))

Disposal
Other types of recycling
Re-use

Hazardous waste
Excluded Recyclable Material
U.W.
Managements Options for .73 Recyclers

Treatment Activity:
- Treat CRTs – (into CRT glass)

Disposition Option:
- Disposal
- Other types of recycling
- Smelter or CRT glass manufacture

Management:
- Non-RCRA
- RCRA
- Hazardous Waste
- Conditional exclusion (U.W.)
- U.W.
Disposal Options

- Upon request, demonstration documents (that there are no recycling options)
  - Class I – fully regulated (e.g., LDRs, permitted facility)
  - Class II or III - Conditional Exclusion (from h.w. standards)
Conditional Exclusion

Non-RCRA (i.e., panel glass) may be excluded from classification as H.W.:

Conditions include:

- H.W. only because it fails TTLC
  - (H&S section 25141.5)
- Use Method 3052/1311 (for testing)
- Notification – Certification
- Treat to remove phosphor powders
- Disposal – Class II or III landfill
Other types of recycling

Hazardous waste CRT/CRT glass
- Recyclable material
  - Use/reuse
  - Reclamation
  - Use constituting disposal

Universal Waste CRT/CRT glass
- CRT glass manufacturer
- Primary/secondary Lead smelter
Next steps

- Complete emergency reg. process
  - Consider feedback
  - Finalize regulatory language
- Find other viable recycling options
  - 2 year time limit
  - Emergency Regulations = short term fix
  - Long term solution = development of other types of recycling with industry input