

# States Seek EPA Help On Policy, Other Barriers To Electronics Recycling

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State electronics recycling program managers are calling on EPA to assist states and industry in addressing regulatory, market and other barriers preventing the recycling of cathode ray tubes (CRTs) and limiting states' ability to regulate CRT recycling, saying the issues now facing CRTs could apply to other products in the future.

EPA has met with members of the Electronics Recycling Coordination Clearinghouse (ERCC) to discuss some of the issues but has yet to agree to a formal stakeholder dialogue, according to sources. Among the reasons states want the talks is their concern about the lack of clarity on who can enforce CRT regulations, especially when CRTs are moved across state lines, and on the differences in state landfill disposal limitations, an ERCC source says.

ERCC sources say the agency is reluctant to host a dialogue and has not responded to a February request to participate in meetings organized by stakeholders, including ERCC, which represents state recycling managers and allows electronics manufacturing, retail and recycling companies to be affiliated with the group.

An EPA spokeswoman says the agency recognizes that the stockpiling of CRT glass is a growing environmental concern and is currently evaluating available information to determine the appropriate next steps. "As we undertake this evaluation, we will be coordinating with our State partners as well as with other participants in the CRT recycling system," the spokeswoman says.

The concern over CRT recycling comes as a growing number of states have discovered stockpiles of CRT glass due to limited markets and high recycling costs, causing recyclers in several states to be found in violation of the federal CRT rule for speculative accumulation.

The CRT rule, a Resource Conservation & Recovery Act regulation, streamlined management requirements for broken CRTs and CRT glass sent for recycling, with the intent that making CRT recycling easier could also facilitate recycling of the entire electronics wastestream, according to EPA's website. CRTs are the video display components of older televisions and computer monitors. The glass in CRTs typically contains enough lead to require managing it as hazardous waste under certain circumstances.

The concern also comes as Colorado March 19 became the latest of nearly two dozen states to ban landfill disposal of CRTs and other electronic waste and as a similar number of states have mandated the recycling of electronic waste, although ERCC says the environmental concerns over CRT recycling are not directly connected to state laws mandating recycling.

ERCC first wrote to EPA in November, saying EPA is in a position to mitigate the challenges to CRT recycling, which include increasingly fewer outlets for CRT glass, which lead to increased recycling costs, increased stockpiling and materials being sent across state lines to hazardous waste landfills.

This situation "is threatening to undermine recent progress made at the state, federal and local levels to responsibly collect and recycle used electronic equipment," ERCC wrote in its Nov. 15 letter to Suzanne Rudzinski, director of EPA's Office of Resource Conservation and Recovery.

The group is continuing to press for national attention to the issue, telling EPA in a Feb. 13 letter, following a meeting between EPA and ERCC representatives, that while CRT glass is the current challenge, "in the future other products may have similar circumstances. There is a need for a larger vision for materials used in current

and future products in order to develop appropriate regulatory strategies that support domestic and global markets." *Relevant documents are available on [InsideEPA.com](https://www.epa.gov/insideepa). (Doc ID: [2429375](#))*

A stakeholder dialogue on CRT glass could achieve several outcomes, ERCC says in its February letter, responding to EPA questions.

These include: helping stakeholders understand existing CRT glass markets and generation of glass in the United States; delineating areas where there might need to regulatory flexibility or changes to address storage of CRT glass in a manner that does not encourage stockpiling; gaining a clearer understanding of what is allowed under federal rules regarding landfilling of CRTs and how state landfill bans impact these options; understanding EPA's plans, if any, for taking enforcement action on stockpiling; identifying types of compliance assistance collectors and recyclers might need from EPA; and identifying data needs and methods for gathering better data on how CRTs are currently managed.