



American Retroworks Inc.
dba Good Point Recycling
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Response to BAN from Good Point Recycling, a division of American Retroworks Inc.

April 19, 2004

The Basel Action Network

c/o Asia-Pacific Environmental Exchange
1305 4th Ave., Suite 606
Seattle, WA 98101

Dear Ms. Westervelt,

Thank you for inviting our company, American Retroworks Inc., to participate in your simple and reasonable request to determine where the bad CRT glass sent for recycling is actually going. We support your science and statistic-based effort to flush out the lowest common denominator of e-scrap – toxic, unrepairable, heavy, sharp and unwanted CRT glass. Simply, 80% of the toxics are in 20% of the material, and the glass test helps to find where that material goes.

From April-December of 2003 American Retroworks Inc (dba Good Point Recycling) collected **670,000 lbs.** of computers, televisions, printers, microwaves and other electric and electronic items. We collected other material from 1999-2002 and for the first 3 months of 2003 which was delivered directly to ElectroniCycle Inc. of Gardner MA.

Good Point Recycling is not technically a processor of e-scrap; we have an extensive logistics and collection program in a 5-state region, and we test equipment for repair and reuse, and sort other material for a sorting credit upon delivery to ElectroniCycle Inc.

Of the 670,000 lbs. of material collected in 2003, **63% (422,000 lbs.)** – including all the non-working and unrepairable leaded TV and monitor CRTs -- were delivered to ElectroniCycle. We processed metals (demanufactured PCs and printers, 0% glass) through local scrap metals dealers. In 2003 we had small shipments of working equipment delivered to World Computer Exchange for South America and to schools in Honduras and Belize through Vermont Rotary Clubs, and delivered TVs for repair either to ElectroniCycle or local technicians.

The 422K lbs. delivered to ElectroniCycle was not strictly glass, but the majority of it was delivered for recycling since we had already "cherry picked" working materials. Based on our audits of ElectroniCycle (and my 2 years as an executive there) we are comfortable with their attached results, showing that over 42% of that material resulted in processed CRT glass. When factored for material kept in inventory for 2004 and material demanufactured or sold for reuse from our VT warehouse, **26%** (42% x 63%) of all material collected from our clients resulted in **172,000 lbs. of domestically processed, leaded, CRT glass.** This is by far the largest percentage of material we handled, surpassing steel scrap and repairable monitors. A portion of the equipment we send to ElectroniCycle, such as specialty market items (terminal screens, printer cartridges, cables, repairable TVs, etc.) is further tested for reuse,

but this would account for less than the weight of the metals we divert so the 42% is still a very accurate measure.

The remaining **248,000 lbs.** of material either recycled locally, sold for reuse, or still in inventory at the end of 2003 would not contain any measurable quantity of bad CRT glass. Since we cannot process it ourselves, our triage process seeks to minimize any overhead or inventory to store junk electronics. We do find some material kept by mistake or which proves to be **unrepairable after further testing**, but we are considered a **very small quantity generator** of leaded scrap (i.e. material actually handled, stored or inventoried or tested in our warehouse).

We selected ElectroniCycle Inc. of Gardner for a number of reasons. First, they are experts in TV reuse and repair, which we see as the fastest-growing component of our collection stream. Second, they allow us weekly access to view their CRT glass processing operation, whose weights we have verified with the glass-to-glass recycler Envirocycle of PA. Third, as the official state contractor to the Massachusetts and Maine DEPs, any transgression or false reporting by ElectroniCycle would not simply be a matter of environmental enforcement, as important as that is. **It would be fraud against a state contract and enforceable as such by the Attorney General's Office of either state, or by our own diligence in civil court.** In the business world, fraud enforcement is more feared than environmental (international or domestic), which is perhaps why some large recyclers consistently fail to submit bids for binding government contracts.

For this reason we encourage all collectors like ourselves to **utilize state contracts** as a protection against illegal dumping and exports, and we encourage more states and more OEMs to issue contracts including environmental guarantees, and to audit the performance on those contracts, and to allow other generators to purchase services off of those contracts. And of course, to pursue enforcement of the terms of those contracts in civil and criminal courts. There are many official contractors to choose from in many states, so this should not overly narrow the bidding pool. Rather, use of those contracts will encourage an economy of scale and lower the price of safe, domestic, e-scrap recycling.

Sincerely,



Robin Ingenthron, president
American Retroworks Inc.
Good Point Recycling
www.retroworks.com

A copy of annual audit of our primary CRT scrap service provider, ElectroniCycle, Inc., is attached