

US EPA's PROPOSED CRT RULE

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The US EPA has chosen to create a special rule for CRTs, rather than making them a universal waste.

In 1998, the Electronics Subcommittee of the Common Sense Initiative (CSI) Council recommended that EPA streamline its RCRA management requirements for CRTs.

Purpose of Rule: To encourage greater reuse, recycling and better management of this rapidly growing waste stream.

Estimated Timeline for implementing the CRT rule:

- December '01: The proposed rule will go to the Office of Management and Budget (OMB) as soon as the Administrator's office clears it.
- Jan-March '02: OMB has a mandatory three month period to perform a cost analysis, after which they will contact EPA staff with any comments they may have.
- Spring '02: The proposal is sent to the Administrator for signature and then it is published in the Federal Register.
- mid 2002: There will be a sixty day public comment period.
- 2003: EPA generally hopes to draft the final version and publish it in the Federal Register about 1 year after the comment period closes on a proposal. It becomes effective a few months after that.

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Why not a universal waste?

There is already a framework and requirement for universal waste. EPA wanted to create a rule tailored specifically to CRTs. Some reasons for this decision include:

- Computers are very heavy, and the weight cut-offs for universal waste didn't make sense. Just 7-8 monitors exceed limits for CESQG (conditionally exempt small quantity generator)
- CRTs may resemble commodities more than wastes if handled properly, ie, the glass can be sold to make new CRT glass, sent to a lead smelter, etc.

Time will tell how different the final rule ends up being from a universal waste rule.

Summary of Proposed Rule

Who Is Regulated and Who Is Not?

Not Regulated

- Households: may send used monitors to any collector for recycling or disposal.
- CESQGs: Non-residential generators of less than 100 kg. per month (about 7 or 8 computers) are not subject to most Subtitle C standards.
- User who sends CRTs to a collector or reseller for potential reuse or repair: if the CRTs may be reused, they are products, not wastes.
- Intact, off-spec CRTs sent for recycling: these are products, not wastes.
- Non-CRT electronic materials:
 - Whole used circuit boards and shredded circuit boards are not regulated.
 - Other: No reason to think these are hazardous, but EPA is examining.

Regulated With Streamlined Requirements:

- Used Broken CRTs Sent for Recycling:
 - Conditionally excluded if they comply with universal waste-type packaging and labeling requirements for storage and shipment.
 - No speculative accumulation.
- Glass Processors:
 - Must store broken CRTs indoors or in accordance with universal waste-type packaging and labeling, no speculative accumulation.
 - May not use temperatures high enough to volatilize lead.
- Processed Glass:
 - If sent to a glass-to-glass manufacturer or lead smelter, not regulated - treated as a product, unless speculatively accumulated..
 - If sent to other kinds of recycling, must comply with universal waste-type packaging and labeling.
 - No speculative accumulation.

Regulated Under Full Subtitle C:

- Disposal in a landfill or incinerator, if the disposer is not a household or a CESQG.

EPA is still seeking comments on the following:

- Whether to require universal-waste type tracking and notification requirements for larger generators of CRTs.
- Which used CRTs should be subject to speculative accumulation requirements.
- Whether processed glass sent to recyclers other than glass-to-glass manufacturers should be regulated.
- Whether disposal requirements should be streamlined.

(The above information was obtained from Marilyn Goode, US EPA)