

From: Lynn, Tricia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D8747BA49CDE485EA4AC58DBF09C3DCD-TRICIA SLUSSER]
Sent: 1/31/2018 10:17:26 PM
To: Bobby Elliott [bobby@resource-recycling.com]
Subject: RE: Comment on TDM/Videocon

Bobby—

On background:

1.) Is it the U.S. EPA's understanding that Videocon continues to receive CRT glass from North America and is recycling it into new CRT devices?

EPA does not have information on this.

2.) How much CRT material is Technologies Displays Americas (TDA) allowed to export annually to Mexico? Has this total changed in recent years or remained relatively stable?

Technologies Displays Americas (TDA) has submitted export notices to EPA and received consent from the competent authority in Mexico to export a maximum amount of 108,000,000 kg of CRTs annually since September 2011. Note that the quantity of material that exporters propose to ship in their export notices often exceeds the quantity of CRTs that are actually exported because notices contain an estimated quantity.

Based on annual reports submitted by TDA for 2015 and 2016, TDA exported 77,643,975 kg CRTs for recycling to TDM in 2015, and exported 32,598,245 kg CRTs for recycling to TDM in 2016. Of the 77,643,975 kg CRTs exported in 2015, 2,373,565 kg was CRT devices; 64,288,649 kg was bare CRTs; and 10,981,761 kg was CRT glass. Of the 32,598,245 kg CRTs exported in 2016, 1,852,800 kg was CRT devices; 29,775,793 kg was bare CRTs; and 969,652 kg was CRT glass.

EPA only has shipment data on the actual quantities of CRTs exported for 2015 and 2016.

3.) Has TDA or the company's Mexican partner(s) informed U.S. EPA of where CRT glass is ultimately being sent for recycling? If so, where is it being sent?

Under Resource Conservation and Recovery Act (RCRA) regulations, hazardous waste exports are subject to requirements that track the shipment from initiation to the foreign receiving facility (i.e., the international movement document) and confirm receipt and final disposition of the waste (i.e., the confirmation of receipt and confirmation of recovery or disposal). However, under the CRT exclusion of the RCRA regulations (40 Code of Federal Regulations 261.39), EPA established different requirements for CRTs exported for recycling and processed CRT glass.

Under the CRT exclusion, exports of processed CRT glass destined for recycling at a CRT glass manufacturer or a lead smelter are not subject to export requirements, and exports of CRTs sent for recycling are subject to the notice and consent process and annual reporting requirements. Under this process, exporters must submit an export notice to EPA providing information about the proposed shipments planned during a 12-month or lesser period, including information about the proposed shipments and proposed foreign recyclers. Exports are prohibited unless the importing country has consented to the notice and EPA provides an Acknowledgement of Consent to the exporter. However, under the CRT exclusion, exports of CRTs for recycling are not subject to tracking requirements or requirements to confirm receipt and final disposition of the material. You can read more about the requirements to export CRTs for recycling and processed CRT glass at <https://www.epa.gov/hwgenerators/requirements-transboundary-shipments-specific-wastes> and <https://www.epa.gov/hw/frequent-questions-about-regulation-used-cathode-ray-tubes-crts-and-crt-glass>

Nonetheless, in previous years, in the notices TDA submitted to EPA proposing export of CRTs to Technology Displays Mexicana (TDM) for recycling, TDA stated the processed glass was planned to be sent to Videocon. However, even though CRT export notices include proposed downstream recyclers, EPA has no evidence that the material actually was sent to Videocon.

Best,

Tricia

Tricia Lynn
Office of Public Affairs
U.S. EPA
Office: 202.564.2615

On Jan 29, 2018, at 5:05 PM, Bobby Elliott <bobby@resource-recycling.com> wrote:

Hey Enesta,

TDA (Technologies Displays Americas) is the American wing of TDM (Technologies Displays Mexicana). Essentially, TDA is just in place to function as a collector and exporter of American material; TDM does the actual processing of the material in Mexico.

On Mon, Jan 29, 2018 at 1:07 PM Jones, Enesta <Jones.Enesta@epa.gov> wrote:

Bobby: You refer to TDM in your original email and then TDA is your email to me. Are they different? How so?

On Jan 29, 2018, at 12:37 PM, Bobby Elliott <bobby@resource-recycling.com> wrote:

Absolutely - let me know if you need any additional information, I'm happy to lend a helping hand.

B

On Mon, Jan 29, 2018 at 12:34 PM, Jones, Enesta <Jones.Enesta@epa.gov> wrote:

On it. Thanks Bobby.

On Jan 29, 2018, at 12:34 PM, Bobby Elliott <bobby@resource-recycling.com> wrote:

Thanks for getting back to me on this, Enesta.

Please see my questions below - I've got a deadline of 6 pm ET tomorrow.

1.) Is it the U.S. EPA's understanding that Videocon continues to receive CRT glass from North America and is recycling it into new CRT devices?

2.) How much CRT material is Technologies Displays Americas (TDA) allowed to export annually to Mexico? Has this total changed in recent years or remained relatively stable?

3.) Has TDA or the company's Mexican partner(s) informed U.S. EPA of where CRT glass is ultimately being sent for recycling? If so, where is it being sent?

Thanks very much for your help on this, Enesta - I really appreciate it

Bobby

On Mon, Jan 29, 2018 at 11:33 AM, Jones, Enesta <Jones.Enesta@epa.gov> wrote:

Hi Bobby, are you still looking for information? Where are your specific questions and hard deadline?

Thanks,

From: Bobby Elliott <bobby@resource-recycling.com>
Sent: Monday, January 22, 2018 8:14 AM
To: Gallo, Dan
Subject: Comment on TDM/Videocon

Hey Dan,

I hope this email finds you well. I wanted to reach out to see if it would be at all possible for you to comment on a story I'm working on this week.

Essentially, I'm working on a story to update our readers on the status of two interconnected CRT glass businesses: TDM and Videocon. TDM has recently had to branch out and find other glass outlets because Videocon, our reporting suggests, now only accepts small amounts of material from TDM. No one else can route material to Videocon, not even folks like ERI.

What's more, we've heard from one source - and this has yet to be confirmed or denied by Videocon - that Videocon is no longer making CRTs, but is working on some kind of new recycling project. I don't know what that it is just yet...

Anyway, I wanted to reach out to you to see if you'd be willing and able to comment on any of the above. You've been at the center of much of the CRT discussion of late and your thoughts would be invaluable to the story.

Let me know -

Bobby

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Bobby Elliott

Editor at Large

Resource Recycling

Ex. 6

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