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**From:** Lynn, Tricia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D8747BA49CDE485EA4AC58DBF09C3DCD-TRICIA SLUSSER]  
**Sent:** 1/9/2018 5:18:15 PM  
**To:** Bobby Elliott [bobby@resource-recycling.com]  
**CC:** Press [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b293283291dc44e0b5d1c36be9281d8a-Press]  
**Subject:** RE: Checking in

Hi Bobby—

If attributing, please attribute to “an EPA spokesperson:”

**1.) How does this impact U.S. companies that have been sending CRT glass to Jansen in the Netherlands?**

**Response:** The Netherlands government (Inspection Leefomgeving & Transport, ILT) informed us of their new waste policy plan (LAP3), under which they will no longer allow imports of processed CRT glass for the production of concrete. The policy took effect December 28, 2017. Currently, one U.S. exporter has consent from ILT to export CRT glass to A. Jansen B.V. ILT has informed us that they plan to formally withdraw their consent to notices to export CRT glass to A. Jansen B.V. sometime in January. In the meantime, A. Jansen B.V. has asked its providers not to ship CRT glass to their facility. ILT has notified us that shipments that arrive at the Jansen facility after the Dutch authorities withdraw their consents will need to be returned.

**2.) Is there any historical data on the amount of CRT glass shipped to Jansen in recent years? Has Jansen been a sizable outlet for U.S. CRT glass?**

**Response:** Based on annual reports submitted to EPA, 74,440 kg of CRTs were exported to Jansen in 2016.

**3.) Where does U.S. EPA currently stand on CRT-to-concrete operations? Is the use of recovered lead in concrete products considered a legitimate recycling option?**

**Response:** Use of processed CRT glass as aggregate in concrete that is applied or placed into the land is a type of recycling under the Resource Conservation and Recovery Act regulations in 40 CFR 261.2 (c). As explained in frequent question number 15 on our web page and also pasted below: <https://www.epa.gov/hw/frequent-questions-about-regulation-used-cathode-ray-tubes-crts-and-crt-glass>

*15. Is the use of processed CRT glass in aggregate for concrete an acceptable use by EPA? What requirements would apply?*

Use of processed CRT glass as aggregate in concrete that is applied or placed into the land would be considered a type of “use constituting disposal” (UCD) and would be considered an acceptable use in the United States only if it met the alternative hazardous waste management standards in 40 CFR part 266 Subpart C, per 40 CFR section 261.39(d) of the Resource Conservation and Recovery Act (RCRA) regulations. The UCD regulations require the hazardous material to be bound into the new product (i.e., inseparable by physical means) and must meet hazardous waste treatment standards for each hazardous constituent present (e.g., lead, cadmium, chromium, etc.) (40 CFR section 266.20).

In addition, prior to being incorporated into the concrete, the processed CRT glass is subject to all applicable hazardous waste generation, transport and storage requirements (40 CFR sections 266.21, 266.22, and 266.23).

For more information about the requirements for exporting processed CRT glass for use as aggregate in concrete, please see frequent questions 16 and 17 on our webpage and also pasted

below: <https://www.epa.gov/hw/frequent-questions-about-regulation-used-cathode-ray-tubes-crts-and-crt-glass>.

*16. What are the requirements for exporting processed CRT glass for use as aggregate in concrete?*

Exports of processed CRT glass to be used as aggregate in concrete are subject to RCRA hazardous waste export regulations and the laws and regulations of the importing country. Exports of hazardous waste are subject to 40 CFR Part 262 Subpart H.

*17. What are the requirements for exporting intact or broken CRTs for recycling into their component parts, including the eventual use of the processed CRT glass as an aggregate in concrete?*

In order to be excluded from the definition of solid waste, intact or broken CRTs exported for recycling, must meet the conditions set forth in 40 CFR section 261.4(a)(22), even if the glass in these CRTs is eventually used in a manner constituting disposal (i.e., used as aggregate in concrete and then applied to or on the land). Specifically, exporters of these CRTs must comply with 40 CFR section 261.39 or 261.40.

Best,

Tricia

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Tricia Lynn  
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U.S. EPA  
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**From:** Bobby Elliott [<mailto:bobby@resource-recycling.com>]  
**Sent:** Thursday, January 4, 2018 4:03 PM  
**To:** Yohannes, Lia <[Yohannes.Lia@epa.gov](mailto:Yohannes.Lia@epa.gov)>  
**Subject:** Checking in

Hi Lia,

This is Bobby Elliott writing from E-Scrap News. I hope this email finds you well.

I wanted to reach out to you because we heard the news that A. Jansen B.V. is no longer being allowed to receive CRT glass for processing and use in their concrete products. I had a few questions for you.

Let me know if you can get back to me by Monday - thanks!

- 1.) How does this impact U.S. companies that have been sending CRT glass to Jansen in the Netherlands?
- 2.) Is there any historical data on the amount of CRT glass shipped to Jansen in recent years? Has Jansen been a sizable outlet for U.S. CRT glass?
- 3.) Where does U.S. EPA currently stand on CRT-to-concrete operations? Is the use of recovered lead in concrete products considered a legitimate recycling option?

Although I wasn't able to attend E-Scrap 2017, I heard rave reviews about your presentation. Let's keep in touch going forward on ways the conference can continue to collaborate with the EPA -

All my best,

Bobby

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Bobby Elliott  
Editor at Large  
Resource Recycling

Ex. 6