Inconsistent state laws Products with no OEM in existence

CRTs are big and heavy and inconvenient to recycle

CRT rule doesn't apply to households

Consumers may be unwilling to pay to recycle if disposal is

Technology change (CRTs replaced by flat panel)
With EPR laws, responsibility for disposition of CRTs has
shifted from consumers to manufacturers (Note: this has different perspectives.)

Regional variation in collection systems

"Cherry picking" high-value parts lowers value down the

Economic incentive needed to recycle

Broken CRTs harder to recycle

Enforcement needed against illegal disposal by generators



COLLECTION ____ POINT

OEMs · Municipal Collectors · Recyclers · Retailers

· Thousands of collectors are highly fragmented and hard to organize

No standard or requirements for a "collector"

 Subsidies and manufacturer payments going to collectors rather than recyclers

Collectors have no solution for CRT glass

Breakdown in contracting/auditing for ensuring proper CRT alass disposition

Recyclers collecting without contracts with manufacturers

"Cherry picking" high-value parts lowers value down the

 Lack of/varying levels of education about CRT regulation in different states

CRTs are heavy and pose a challenge to ship long-distance

Inconsistency in state programs

· Lack of up-to-date information for consumers on which collectors will take CRTs

Hiring of recyclers sometimes leads to funding being split by two recyclers

Lack of rural route density increases cost per unit

Bad actors in the industry misrepresenting "air pounds"

Broken CRTs are harder to recycle

· Shipments out of state can't be regulated by original urisdiction

Use of pounds as basis for performance encourages CRTs to be collected

Ergonomic challenges of managing CRTs—physical wear and tear on people

abandonment of the CRTs. **ELECTRONICS**

Financial incentive for entities to get paid to receive

CRTs and then not pay to recycle (or dispose)
Lack of enforcement of CRT rule by states and EPA
Lack of tracking of CRTs to final disposition
Barriers to entry are low

CURRENT UNDERSTANDING OF THE

ASSEMBLED BY U.S. EPA. SEPTEMBER 2014

CRT Problem Statement

CRTs and CRT glass were once easily recycled

into new CRTs; however, the demand for new CRTs has collapsed in favor of new flat panel

Because of rising costs, negative economic

incentives, and shifts in CRT glass markets.

choosing to store the glass indefinitely rather

than send it for recycling (or disposal), which

increases the risk of mismanagement and/or

some CRT processors and recyclers are

BY THE ELECTRONICS RECYCLING COMMUNITY

CRT LANDSCAPE

technologies.

Lack of awareness about phosphor, silica and lead hazards in the workplace

Certification is not assurance of compliance or responsible recycling

Stewardship organizations represent a monopsony and consolidate the control of contracts by selecting vendors. This creates lack of competition, which in certain states raises costs. (Note: this has different perspectives.)

Recyclers aren't charging enough to cover costs for recycling

Too many recyclers are exporting CRTs improperly Whenever the state manages CRT recycling, it

seems issues of mismanagement increase Lack of knowledge about outlets for recycling CRTs

Lack of engagement of glass manufacturers who made the glass

Lack of adequate closure plans

Ergonomic challenges of managing materials physical wear and tear on people

Costs are high to switch to new technologies

Lack of clear specs for recycling grade material Need to ship trailer loads of CRTs/glass in order to be accepted

Thin operating margins, insufficient funds held

ALTERNATIVE DAILY COVER



State bans on landfilling CRTs Doesn't count toward state recycling obligations

DISPOSAL IN LANDFILL

- Not environmentally-friendly
- Potential stigma issues



Large capacity likely

Doesn't count toward state recycling obligations

ADC may be considered a form of recycling by some, which discourages other recycling options for CRT glass

(Note: Different perspectives on this point)
 Whether ADC would be considered legitimate recycling by

Potential stigma issues

ADVANTAGES

CHALLENGES

CERAMICS

- Substitute for raw material
- Doesn't require energy to separate lead from glass because
- Large global capacity potentially available
- Would likely require export
- May not be able to export to non-OECD countries
- Shifts the lead to ceramics, which may create legacy issue
- No MSDS required on tiles
- Proper firing required in order to minimize exposure
- Needs regulatory certainty/acceptance
- Real capacity unknown

GLASS FURNACES Uses electricity/plasma to separate lead from glass

- Smaller and regional in scale; could be colocated with large piles of glass Multiple furnaces would lower freight costs
- · Lead recovered from CRT glass
- Very few in operation
- High energy consumption; lifecycle assessment may be
- Needs longer timeframes to store glass
- Small capacity
- Permitting/regulatory issuesDisposition of slag

GLASS TO GLASS/CRT MANUFACTURING

- · There is niche market for CRTs
- CRTs are inexpensive and are more robust equipment for variable power situations
- New CRTs will eventually need recycling
- Lack of engagement with the glass manufacturers in recycling options for CRTs
- Declining market

CONCRETE

- Huge capacity
- Regional markets

- Shifts the lead to concrete products, which may create legacy issue
- Whether treatment process adequately prevents leaching
- Permitting issues
- Potential stigma issues (e.g., "Not in My Back Yard" [NIMBY])

LEAD/COPPER SMELTER

- Existing process in operation
- Regulated
- Large capacity
 - o (Note: Different perspectives on this
- Limited capacity and no growth potential

 o (Note: Different perspectives on this point)
- Lead recovery may not be very efficient Disposition of slag
- Air emissions
- Variable commodity prices Permitting of new smelters is difficult
- Few smelters in North America accept CRT glass
- Perception of taking in hazardous waste Needs longer term storage of glass

CRT REUSE

- There is niche market for CRTs
- CRTs are more robust equipment for variable power situations
- Inexpensive compared to LCDs
- Low demand in US
- Hard to export; exports can be abused as "sham reuse"
- Wiring diagrams are needed to refurbish
- Reused CRTs will eventually need recycling
- Inadequate enforcement of CRT rule

RETRIEVABLE STORAGE

- Avoids irresponsible speculative accumulation
- Allows material to be held until solutions appear
- Quantify the amount of available feed stock or supply
- Funding needed/Need to devise a financial structure to account for recovery
- May create a legacy issue
- Competes with viable recovery technologies
- Hazardous waste permit and regulations may apply
- Seen as a "kick the can down the road" approach

CHEMICAL EXTRACTION

- · Potentially environmentally friendly process
- Complete recovery of lead
- Not operational commercially
- Could be expensive
- Potentially slow and time intensive
- Limited capacity