



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

Apr 9 - 2009

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

Mr. T.T. Srinivasan  
SAMCA International  
P.O. Box 772  
Pittsford – Mendon Road, N.Y. 14534

Dear Mr. Srinivasan:

In a letter dated March 23, 2009, you requested that the Environmental Protection Agency (EPA) send you a letter about the regulatory status of glass cullet from cathode ray tubes (CRTs) under the Resource Conservation and Recovery Act (RCRA). I understand that your company, Samca International, is considering sending processed glass from CRTs to a glass manufacturer in India.

The Environmental Protection Agency (EPA) published a rule (71 FR 42928, July 28, 2006) which streamlines RCRA management requirements for this material if it is sent for recycling, including recycling that occurs at a glass manufacturing facility. For your convenience, I am attaching a copy of the rule.

With respect to glass from used CRTs, export requirements under the rule depend on how the glass is classified. Generally, CRT glass is classified as "processed CRT glass" or as "used broken CRTs." "Processed CRT glass" is glass that has been broken, separated, and sorted or otherwise managed after it has been removed from CRT monitors. To meet this definition, the glass does not have to be cleaned; that is, the coatings do not have to be removed (for the definition of "CRT processing," see 40 CFR 260.10). Under 40 CFR 261.39(c), this glass, if it is sent to a CRT glass manufacturer or a lead smelter, is not subject to any export requirements, and it need not be packaged or labeled. The Agency considers it to be a commodity rather than a waste.

If glass has been removed from used CRT monitors and has not been sorted, or otherwise managed, it would be considered "used broken CRTs." Such glass is also not considered a solid waste or hazardous waste if it is managed in accordance with the requirements of the new rule. However, if it is exported, the glass would be subject to the requirements of 40 CFR 261.39(a)(5), which require notice to EPA and consent from the receiving country. These requirements would also apply to mixed shipments of processed CRT glass and used broken CRTs that are exported.

The requirements became effective on January 29, 2007.

I hope this letter addresses your concerns. If you have any further questions, please contact Marilyn Goode of my staff at 703-308-8800.

Sincerely,



for Robert Dellinger, Director  
Materials Recovery and Waste Management Division

Enclosures