



ADDRESSING THE CRT GLASS MANAGEMENT CHALLENGE

Presented to SWANA Land of Lincoln Chapter February 5, 2014

About Kuusakoski Recycling

- Family-owned company in operation for 100 years
- Worldwide leader in metals and e-waste recycling
- Expanded operations to U.S. in 2009
- Operations currently span 12 countries, 3 continents,
 and 48 states
- Create, develop and manufacture recycling technologies
- e-Stewards, R2, and ISO 14001 certified





Kuusakoski Recycling's Illinois Facilities

- U.S. headquarters located in Plainfield
 - Operations commenced in 2012
 - Primary collection and dismantling facility 160,000 sq. ft.
- Kuusakoski Glass Recycling Facility located in Peoria
 - Operations commenced November 2013
 - In addition to CRT glass management, facility provides collection and dismantling of all e-wastes -50,000 sq. ft.











About Peoria Disposal Company

- Peoria Disposal Company (PDC) and its affiliate Area Disposal Service, Inc. (AREA) are family-owned companies, serving customers throughout the Midwest since
 1928
- The PDC/AREA family includes 15 companies/operations located across Central Illinois, Eastern Missouri and Southern Iowa, employing 600 people
- Operations include 3 active solid waste landfills, 1 hazardous waste treatment and disposal facility, 1 wastewater treatment facility, 3 transfer stations and recycling facilities, 3 environmental testing laboratories, and 1 landfill gas-to-energy plant
- Services include: hazardous and non-hazardous waste collection and disposal,
 waste and wastewater treatment, waste transportation and brokerage, consulting
 and engineering services, laboratory analysis and equipment rental









PDC & Affiliated Landfills

PDC #1 Landfill

Hickory Ridge Landfill



Indian Creek Landfill

Clinton Landfill



PDC & Affiliated Landfills



PDC Waste Treatment & Recycling Facilities

PDC WWTP Facility PDC Waste Treatment Facility



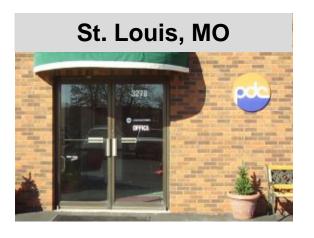
Kuusakoski Recycling

PDC & Affiliated Transportation Companies



PDC Laboratories - 3 Locations











CRT Glass White Paper

- Kuusakoski Recycling retained Shaw Environmental, Inc. (Shaw), a CB&I Company, to evaluate the CRT glass market in the U.S.
- "An Analysis of the Demand for CRT Glass Processing in the U.S." was released to the public on September 9, 2013
 - Available to download at http://kuusakoski.us/white-paper/

An Analysis of the Demand for CRT Glass Processing in the U.S.

Electronic waste recovery and recycling has expanded rapidly in recent years. E-waste collection programs have been established by state legislation in 25 states, and disposal of CRTs is prohibited in 19 states representing approximately half of the U.S. population. Devices containing cathode ray tubes (CRTs - the "picture tubes" in older televisions and computer monitors) are the largest component of the e-waste stream, representing more than 40 percent of all e-waste generated.

End-use markets for CRT glass have substantially declined because consumers and businesses have transitioned instead to flat panel displays and CRTs are no longer domestically produced. For several years, the e-waste industry has expressed growing concern about the management of CRTs, citing increased costs and declining ability for recyclers to secure access to end-use markets

- In December 2012, Transparent Planet completed a study on behalf of e-waste processors which reported that 330,000 tons of CRTs were being stockpiled¹ This study received widespread attention and identified stockpiling and other problems that could occur due to a lack of markets for CRT glass.
- ☐ In March 2013, the New York Times brought further attention to the issue, building on the information presented by Transparent Planet and citing specific examples of stockpiling that were under investigation in California and Arizona²
- In mid-August 2013, Resource Recycling, an industry trade publication, reported large, abandoned stockpiles of CRTs and CRT glass had been discovered at former e-waste facilities in Arizona and Colorado, with quantities estimated to exceed 10,000 tons3. The report also indicated that stockpiling allegations were being investigated in other states, including Maryland and Pennsylvania.
- A week later, Resource Recycling reported an e-waste processor in Maryland had gone out of business and abandoned a warehouse containing approximately 3,000 gaylords of CRTs4. The company owner stated that the CRTs accumulated when he was unable to secure agreements with end-use markets to accept the

Resource Recycling, "Abandoned Baltimore warehouse is full of CRTs", August 2013.









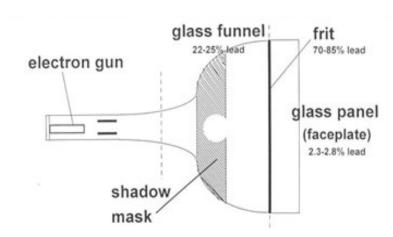
Transparent Planet, U.S. CRT Glass Management: A Bellwether for Sustainability of Electronics Recycling in the United States, December 2012.

Ian Urbina, "Unwanted Electronic Gear Rising in Toxic Piles", New York Times, March 18,

Resource Recycling, "BREAKING: Abandoned warehouses full of CRTs found in several states", August 2013

What is a CRT?

 Cathode ray tubes (CRTs) are the "picture tube" in older televisions and computer monitors

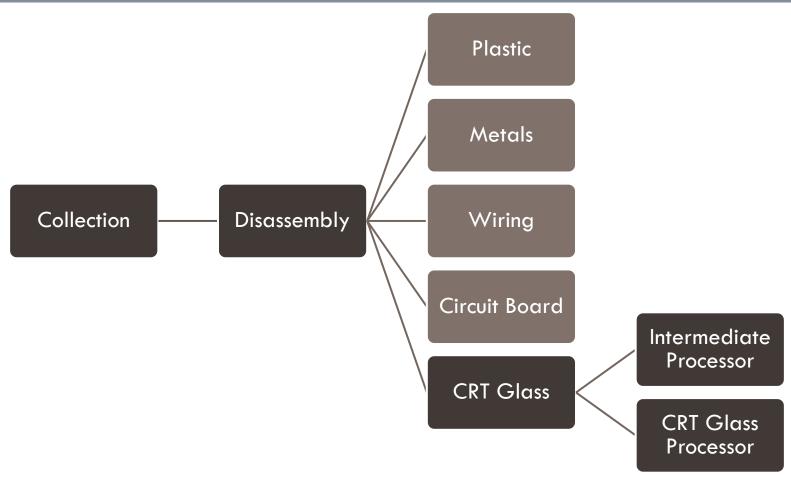




- CRT devices represent nearly one-half of the e-waste stream
- The CRT is mostly glass, comprising 60-70% of the weight of the TV or monitor
 - 30% of the glass (i.e. funnel & frit portion) contains high levels of lead, resulting in the glass being characterized as hazardous waste



CRT Recovery Process Flow





Concerns About CRT Glass Management

- E-waste processors have grown increasingly concerned about:
 - Costs of managing CRT glass
 - Availability of markets to manage CRT glass
- Large quantities of CRT glass are reportedly being stored or abandoned:
 Possures Possuling

New York Times cites facilities in Arizona under investigation for stockpiling Resource Recycling reports on an estimated 10,000+ tons of abandoned CRTs in AZ, CO, and more expected in MD, PA

E-Scrap News reports that Basel Action Network alleges 9 million pounds of CRT glass abandoned in AZ

Dec '12

Jan '13

Feb

Mar

Apr

May

Jun

Jul

Aug

Sep

Transparent Planet issues report estimating 330,000 tons of CRTs are being stockpiled

Resource Recycling reports 3,000 gaylords of CRTs found at abandoned facility in Baltimore



Factors Influencing CRT Glass Management

 Changes in display technologies from CRTs to flat panels

□ Laws mandating recovery of e-wastes

Laws banning disposal of e-wastes



Impact of Technology Shift from CRTs to Flat Panels

 Sales of CRT devices in the U.S. dropped significantly beginning in 2000

 Historically, recovered CRT glass was principally used to make new CRTs

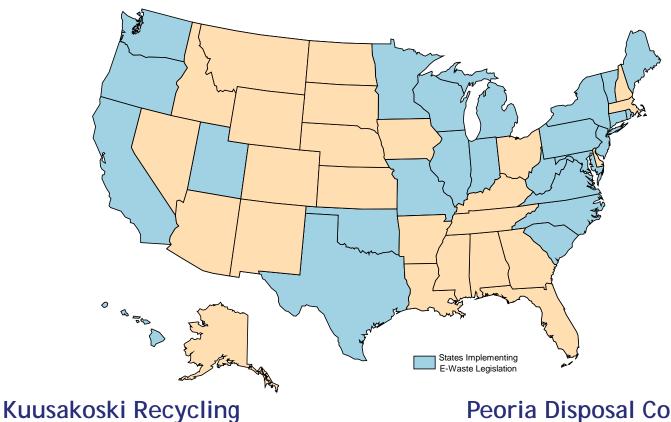
 With the shift to flat panels in the U.S. and other countries, CRT glass is no longer in demand





E-Waste Recovery Laws

25 states have passed legislation requiring recovery and recycling of e-waste, including CRT devices

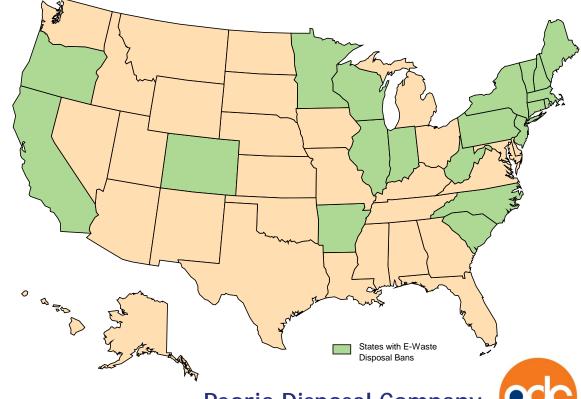






E-Waste Disposal Bans

- 19 states have implemented bans on disposal of e-waste in landfills
 - These states represent about half of the U.S. population

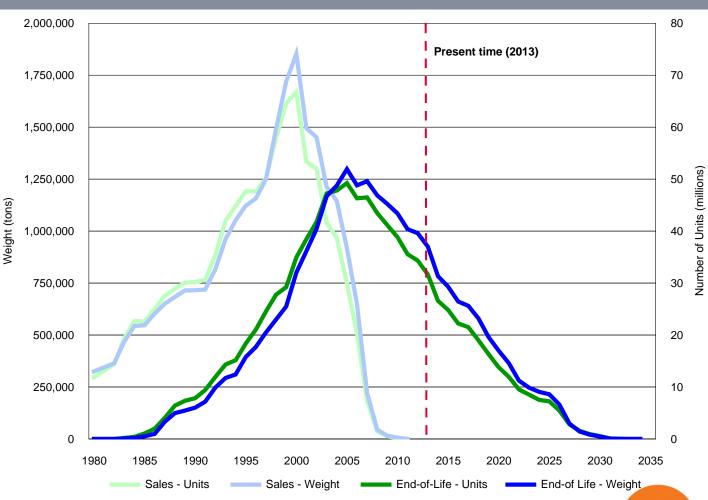




CRT Sales and End-of-Life Projections

Between 1980 and 2010, more than 979 million CRT devices were sold

With a life of up to 23 years, all CRTs are projected to be discarded by 2033

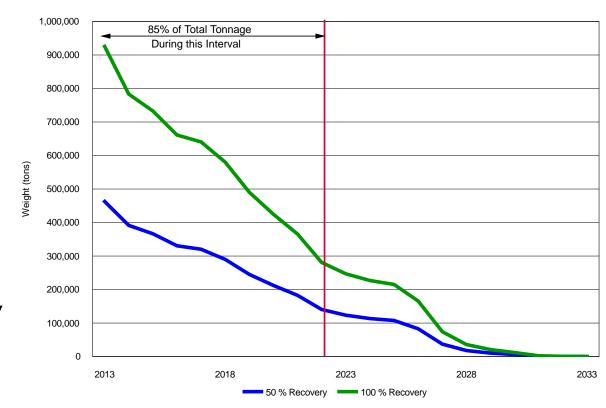




Source: U.S. EPA, Electronics Waste Management in the United States Through 2009, May 2011.

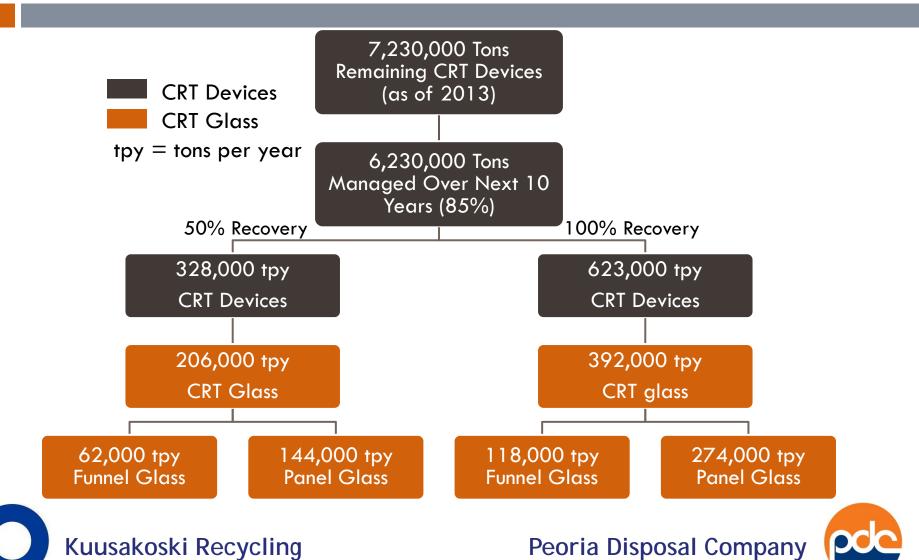
CRT Devices Reaching End-of-Life (2013-2033)

- 85% of remaining CRTs are expected to require management by 2022
 - This is an immediate, short-term concern
- At a minimum, half of these devices are projected to be in states with disposal bans in place
 - More than half are likely to be recovered for recycling, since e-waste recovery is occurring in other states as well

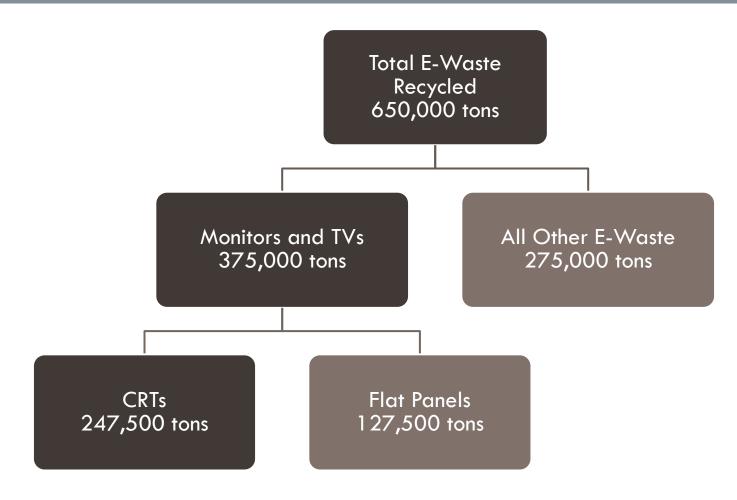




CRT Projections: 2013-2022



E-Waste Recycling: 2010

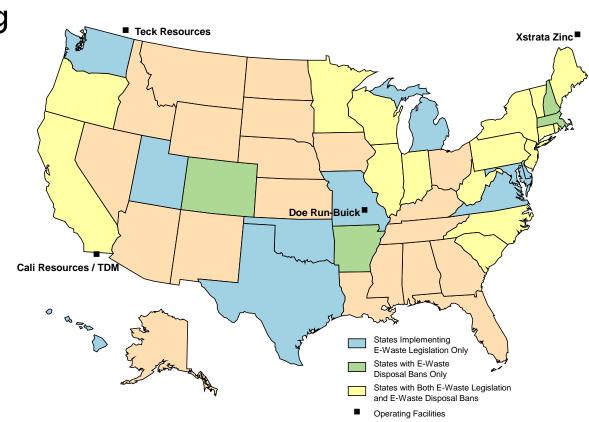




Kuusakoski Recycling

Existing CRT Glass Processing Capacity

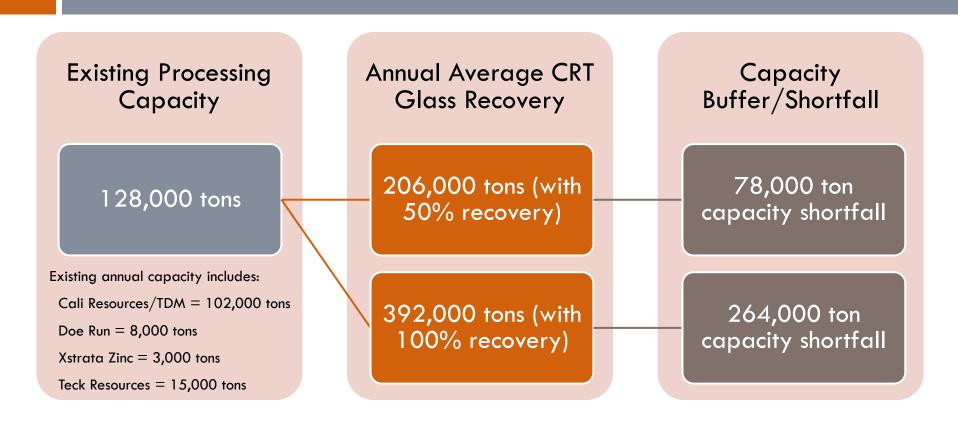
- There are 4 existing facilities processing CRT glass
 - 80% of capacity is at one facility, a glass-to-glass processor
 - Only one facility in the U.S.







Existing CRT Glass Processing Capacity



Average recovery is calculated over 10 years; projected annual recovery is much greater in the near term than shown above





Concerns About Capacity Shortfalls

- A number of agencies have cited concerns about outlets for CRT glass:
 - CalRecycle (California)
 - Wisconsin DNR
 - United Nations Environment Programme
 - U.S. International Trade Commission
- Industry trade associations and publications have also identified concerns:
 - Institute of Scrap Recycling Industries
 - Waste Management World
 - Waste & Recycling News

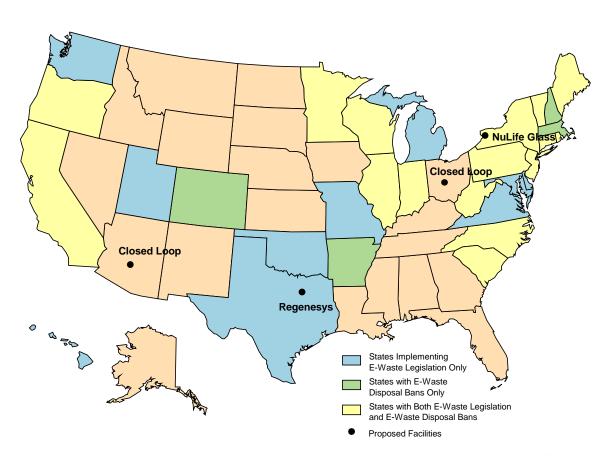




Proposed CRT Glass Processing Capacity

 Four new leaded glass smelting facilities have been proposed in the U.S.

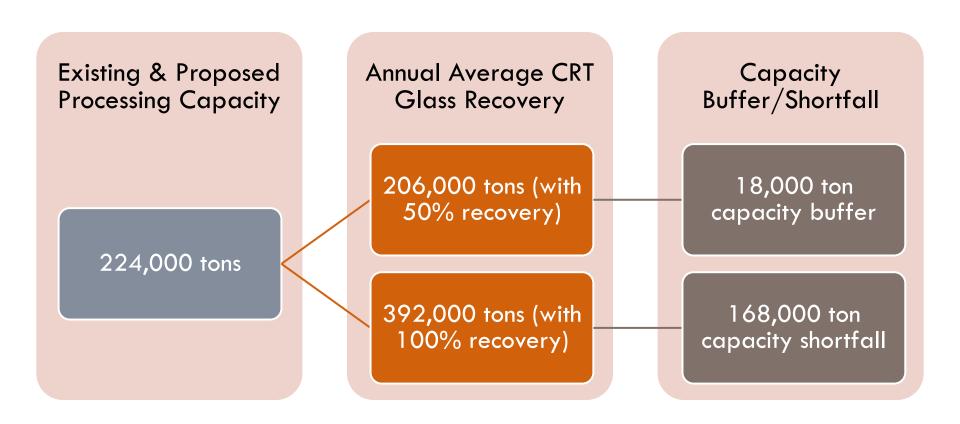
None of them are operating







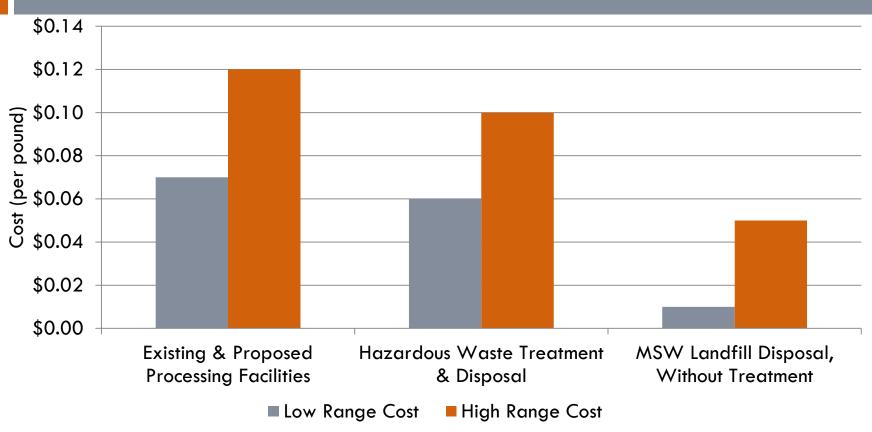
CRT Glass Processing Capacity Review







CRT Glass Processing Costs

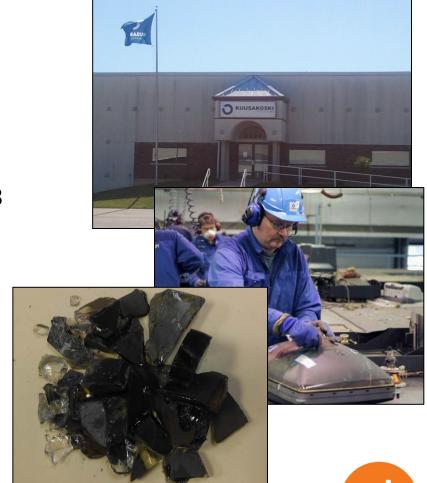


Transportation costs are not included above and generally add \$0.03-0.04 per pound within 400 miles and \$0.05-0.06 per pound or more at greater distances





- Kuusakoski and PDC have developed a comprehensive solution for CRT glass
 - Options analysis began in April 2012
 - Contract finalized in May 2013
 - Fully operational in November 2013
- Kuusakoski generates crushed CRT glass at its Peoria Glass Recycling Facility from:
 - Dismantling of whole CRT devices
 - Bare CRTs from e-waste processors
 - Broken or crushed CRT glass from ewaste processors





- Why does CRT funnel glass have to be managed differently as compared to other e-waste materials?
 - CRT funnel glass typically exhibits toxicity for lead (D008)
 - Toxicity characteristics are found in 40 CFR 261.24,
 Table 1
 - Lead-bearing CRT funnel glass is prohibited from being disposed in a Subtitle D (i.e. nonhazardous) landfill because of its toxicity characteristics (i.e. ≥ 5 ppm TCLP lead)





40 CFR 261.24 Table 1

TABLE 1—MAXIMUM CONCENTRATION OF CONTAMINANTS FOR THE TOXICITY CHARACTERISTIC

EPA HW No. 1	Contaminant	CAS No. ²	Regu- latory Level (mg/L)
D004	Arsenic	7440-38-2	5.0
D005	Barium	7440–39–3	100.0
D018	Benzene	71–43–2	0.5
D006	Cadmium	7440-43-9	1.0
D019	Carbon tetrachloride	56–23–5	0.5
D020	Chlordane	57–74–9	0.03
D021	Chlorobenzene	108–90–7	100.0
D022	Chloroform	67–66–3	6.0
D007	Chromium	7440–47–3	5.0
D023	o-Cresol	95–48–7	4200.0
D024	m-Cresol	108–39–4	4200.0
D025	p-Cresol	106-44-5	4200.0
D026	Cresol		4200.0
D016	2,4-D	94–75–7	10.0
D027	1,4-Dichlorobenzene	106–46–7	7.5
D028	1,2-Dichloroethane	107–06–2	0.5
D029	1,1-Dichloroethylene	75–35–4	0.7
D030	2,4-Dinitrotoluene	121-14-2	30.13
D012	Endrin	72–20–8	0.02
D031	Heptachlor (and its ep- oxide).	76–44–8	0.008
D032	Hexachlorobenzene	118-74-1	30.13
D033	Hexachlorobutadiene	87–68–3	0.5
D004	Hexachloroethane	6/-/2-1	0.0
D008	Lead	7439–92–1	5.0



- How can PDC dispose of CRT funnel glass in a Subtitle D Landfill?
 - 40 CFR Part 268 subpart D establishes Treatment
 Standards for hazardous waste
 - A prohibited waste identified in the table may be land disposed only if it meets the requirements found in the table
 - Compliance with treatment standards is measured by an analysis of grab samples, unless otherwise noted





Treatment Standards Table 40 CFR 268.48 Universal Treatment Standards (UTS) Metals

Regulated Constituent common name	CAS Number	Concentration in mg/l	Concentration in mg/kg unless noted as "mg/I TCLP"
Antimony	7440-36-0	1.9	1.15 mg/I TCLP
Arsenic	7440-38-2	1.4	5.0 mg/l TCLP
Barium	7440-39-3	1.2	21 mg/l TCLP
Beryllium	7440-41-7	0.82	1.22 mg/I TCLP
Cadmium	7440-43-9	0.69	0.11 mg/I TCLP
Chormium (Total)	7440-47-3	2.77	0.60 mg/L TCLP
Lead	7439-92-1	0.69	0.75 mg/I TCLP
Mercury - All Others	7439-97-6	0.15	0.025 mg/I TCLP
Nickel	7440-02-0	3.98	11 mg/ITCLP
Selenium	7782-49-2	0.82	5.7 mg/l TCLP
Silver	7440-22-4	0.43	0.14 mg/I TCLP
Thallium	7440-28-0	1.4	0.20 mg/I TCLP
Vanadium	7440-62-2	4.3	1.6 mg/l TCLP
Zinc	7440-66-6	2.61	4.3 mg/I TCLP

Note: PDC must also meet 40 CFR 268.48 standards for Underlying Hazardous Constituents (UHCs) as well. Vanadium and Zinc are not UHCs.





- □ What is PDC's treatment process for CRT glass?
 - Hazardous stabilization process whereby the CRT funnel glass is physically and chemically changed so that the leachability of the lead content in the glass is virtually immobilized
 - PDC accepted crushed CRT glass from Zenith's manufacturing facility in Melrose Park, IL for treatment and disposal from 1989 to 1998
 - PDC is now using the same treatment technology it has developed for the delisting of K061 Electric Arc Furnace (EAF) dusts generated by steel mills, the largest hazardous waste stream generated by volume in the U.S. today, on crushed CRT funnel glass generated by e-waste collectors/processors





- The treatment process was approved for the delisting of K061 EAF dust by the Illinois Pollution Control Board (IPCB) in January 2009
- The K061 delisting order issued by the IPCB requires PDC to meet the UTS standards for antimony, arsenic, barium, beryllium, cadmium, total chromium, lead, mercury, nickel, selenium, silver, thallium, vanadium and zinc
- Since PDC is using the same treatment technology for CRT glass as it is using for K061 EAF dust, this means that PDC is voluntarily analyzing for many more metals, <u>not just lead</u>
- PDC typically achieves treatment results for CRT funnel glass at or below laboratory instrumentation detection levels for lead (i.e. <0.02 ppm)

Important Note:

- Based on the EPA regulations, CRT panel glass (i.e. non Focus Material) can be disposed of in a Subtitle D landfill at a lead concentration level of 4.99 ppm or less
- CRT funnel glass (i.e. Focus Material) can only be disposed
 of in a Subtitle D landfill post-treatment at a lead
 concentration level meeting UTS of 0.75 ppm or less
- Based on PDC's experience, the treated CRT glass is being disposed at its Indian Creek Landfill at lead concentrations well below the UTS, i.e. 0.02 ppm





- PDC transports crushed glass to its Waste
 Stabilization Facility (WSF)
 - PDC is a licensed hazardous waste hauler; leaded CRT glass is managed as a hazardous waste prior to treatment
 - WSF has not received an environmental violation since 1991; during this time, over 500 unannounced inspections have been performed by IEPA
- Crushed glass is treated, rendering it non-hazardous and the lead relatively non-leachable
 - Delivered glass is <6"; PDC further crushes it to <2"
 - Proprietary chemical treatment reagent blend, and water, is added in mixing unit
 - Samples of treated CRT glass are collected for TCLP analyses to verify compliance with EPA Universal Treatment Standards



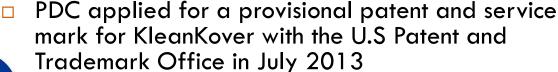








- PDC transports treated CRT glass to Indian Creek Landfill for use as alternative daily cover (ADC)
 - Permitted for use by IEPA in November 2012
 - All treated CRT glass is used as ADC at Indian Creek Landfill, and is tracked and recorded accordingly
 - Non-hazardous CRT panel glass is also permitted by IEPA for use as ADC, if Kuusakoski does not have a viable market for panel glass
 - Indian Creek Landfill has 30 or more years of disposal capacity, with room to expand
 - Since opening in July 2004, Indian Creek Landfill has not received a single environmental violation from IEPA or the Tazewell County Health Dept.





Indian Creek Landfill



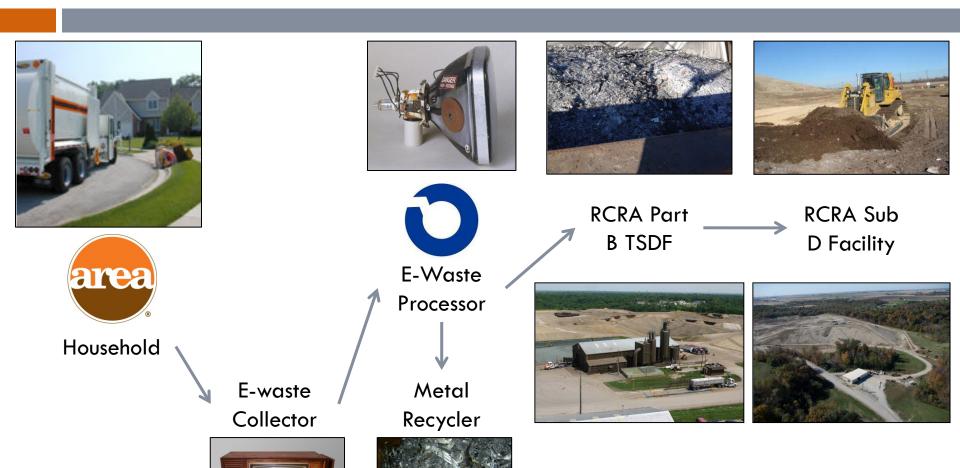
KleanKover Placed as ADC







Process Flow: From CRT Device to KleanKover







Benefits of the KleanKover Recycling Solution

- All processing, treatment, and end use facilities are fully permitted and operational
- Current capacity to manage leaded CRT glass is 50,000 tons per year,
 with potential to increase to 100,000 tons per year
- Cost is at the lower end of the range of current and proposed processing options, with upper end of cost to deliver to Kuusakoski of \$0.075 per pound (\$150 per ton)
- In addition to its 30 year post closure fund, Indian Creek Landfill has an established Perpetual Care Fund to provide monitoring and maintenance of the landfill into perpetuity, exceeding federal and state requirements for post-closure care
- Indian Creek Landfill currently has over \$4,900,000 and \$500,000 of cash assets in its post-closure and perpetual care funds, respectively; these funds cannot be withdrawn without the approval of the IEPA and County of Tazewell, Illinois



Compliance with Illinois E-Waste Law

Illinois Electronic Products Recycling and Reuse Act (EPRRA) says the following:

Section 10

"Recycler" means a person who engages in the recycling of CEDs or EEDs...

"Recycling" means any method, technique, or process by which CEDs or EEDs that would otherwise be disposed of or discarded are instead collected, separated, or processed and are returned to the economic mainstream in the form of raw materials or products. "Recycling" includes the collection, transportation, dismantling and shredding of CEDs or EEDs.





Compliance with Illinois E-Waste Law

Section 15 (C-5)

For program year 2013 and thereafter and for each of the following categories of electronic devices, each manufacturer shall recycle or reuse at least 50% of the total weight of the electronic devices that the manufacturer sold in that category in Illinois during the calendar year 2 years before the applicable program year: computers, monitors, televisions.....



Compliance with Illinois E-Waste Law



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOS PAT QUINN, GOVERNOR LISA BON

217-524-3300

November 26, 2013

Mr. Brandon Wolf Director of Operations Kuusakowski Recycling 2022 W. Townline Road Peoria, Illinois 61615

Dear Mr. Wolf:

This letter is in response to Kuusakowski Glass Recycling's (KKGR) requiremental Protection Agency to clarify how KKGR's CRZ glass procrequirements of the Illinois Electronic Products Recycling and Reuse Act (

KKGR declares that it will receive and process intact and partially stripped and televisions that will be dismantled and that their revicable component and sold for recycling and reuse. The CRT glass from the computer monit will be sorted to separate the non-leaded panel glass from the leaded finne possible, the separated panel glass will be sold for recycling.

KKGR further asserts that any non-recyclable the definition of "waste" as it is defined in Sec Act, and as "solid waste" as it is defined in 35 waste in accordance with waste regulations. I approved disposal facility, while the waste far Corporation's Waste Stabilization Facility in I to meet the Land Disposal Restriction Univers Corporation has already received Illinois EPA as an alternative daily cover material.

The EPRRA requires manufacturers of covere covered electronic devices whose total weight recycling and reuse goal set forth in Section 1

4302 N. Moin St., Rockford, E. 61103 (815)987-7760 595 S. Stote, Elgia, E. 60123 (847)608-3131 2125 S. First St., Champalga, II. 61830 (217)278-5800 2009 Mall St., Calinzville, E. 62234 (618)346-5120

PUME

prohibits the disposal of a covered electronic device in a landfill; it does not, however, expressly prohibit non-recyclable components of those devices from land disposal once the recyclable components of the devices have been removed. If CRT glass that has been removed from a computer monitor or television is processed to recycle all of the recyclable components, the Illinois EPA believes that disposal of the non-recyclable components in a landfill would be appropriate.

If all of the above actions are met and KKGR substantiates that viable recycling markets do not exist for CRT glass, the Illinois EPA will allow manufacturers of covered electronic devices, as defined in the EPRRA, to count the total weight of devices, prior to processing, toward their annual Illinois recycling goals.

Please note that while the EPRRA is administered by the Illinois EPA, violations of the EPRRA are enforced by the Attorney General who has independent authority to bring legal actions. The Illinois EPA recommends that you seek the advice of your legal counsel regarding whether any actions discussed could be enforced as violations of the EPRRA.

Please do not hesitate to contact me if you have additional questions or comments.

David Walters, Manager
Waste Reduction and Compliance Section

The EPRRA requires manufacturers of covered electronic devices to recycle or process for reuse covered electronic devices whose total weight equals or exceeds the manufacturer's individual recycling and reuse goal set forth in Section 15 of the Act. Subsection 95(b) of the EPRRA prohibits the disposal of a covered electronic device in a landfill; it does not, however, expressly prohibit non-recyclable components of those devices from land disposal once the recyclable components of the devices have been removed. If CRT glass that has been removed from a computer monitor or television is processed to recycle all of the recyclable components, the Illinois EPA believes that disposal of the non-recyclable components in a landfill would be appropriate.

If all of the above actions are met and KKGR substantiates that viable recycling markets do not exist for CRT glass, the Illinois EPA will allow manufacturers of covered electronic devices, as defined in the EPRRA, to count the total weight of devices, prior to processing, toward their annual Illinois recycling goals.

IEPA also confirms that covered electronic device manufacturers may include the total weight of electronic devices, including intact and partially stripped TVs and computer monitors managed at Kuusakoski's Peoria Glass Recycling Facility, toward the manufacturer's goals under section 15





Kuusakoski/PDC Partnership Terms

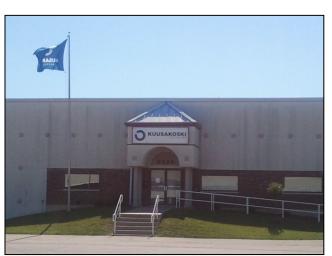
- □ Exclusive contractual agreement between Kuusakoski and PDC:
 - Kuusakoski delivers all crushed CRT funnel glass to PDC's Waste Stabilization Facility
 - Kuusakoski does <u>not</u> have to deliver all crushed CRT panel glass to PDC's Indian Creek Landfill
 - PDC only accepts crushed CRT glass from Kuusakoski, unless other mutually agreeable arrangements are made
 - PDC commits to provide at least 50,000 tons per year of capacity for CRT glass; even if Kuusakoski delivers 50,000 tons per year of CRT glass to PDC for treatment, this <u>still</u> will not take care of the daily cover needs for Indian Creek Landfill on an annual basis
 - Treated CRT funnel glass has to be used as ADC at Indian Creek Landfill





Kuusakoski/PDC Partnership

Please schedule a tour to see our Peoria, Illinois recycling and disposal facilities















Contact Us

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