

#### CRTs in Open Dumps



- Definitions
- Why CRT are hazardous
- Two CRT scrapping case studies
- One CED Collector case study
- CRTs in an open dump

## Cathode Ray Tube



 CRT – Means any vacuum tube or picture tube used to cover an electronic signal into a visual image, such as a TV or computer monitor.

## CRT





#### Toxic Characteristic Leaching Procedure



- Designed to determine the mobility of both organic and inorganic analytes present in liquid, solid, and multiphasic wastes.
- Hazardous waste D004 through D052.
- The TCLP analysis simulates landfill conditions.
  Over time, water and other liquids percolate through landfills.

#### **Covered Electronic Device**



- CED means any computer monitor or television ......taken out of <u>residence</u> in this State.
- To the extent allowed under federal and State laws and regulations, a CED that is being collected, recycled, or processed for reuse is not considered to be hazardous waste, household waste, solid waste or special waste.

#### Why are CRT Hazardous



- Lead
- University of Florida conducted a study of the TCLP lead levels in CRTs
- Sampled 36 processed (ground) CRTs
- Average TCLP lead level was 18.5 mg/L
- Hazardous Waste TCLP lead level is 5.0 mg/L

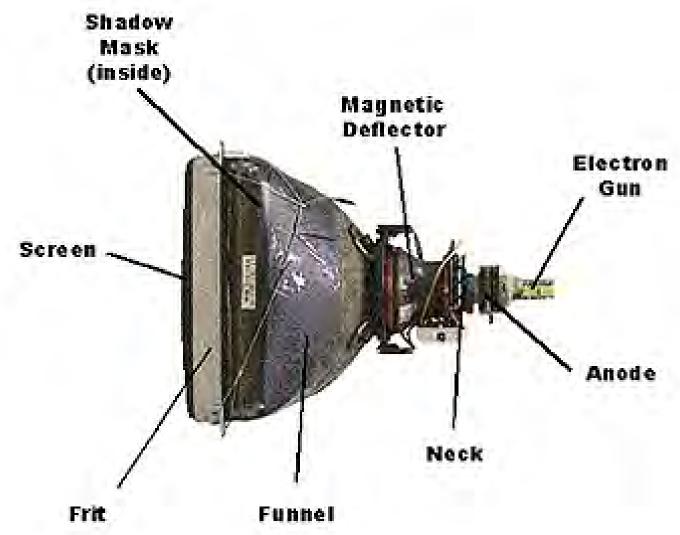
#### Lead is CRT



- Factors that effect the lead levels in CRT
  - Location of the glass
    - Face Plate
    - Funnel
    - Neck
  - The partial size of the sample
  - Type of CRT monochrome vs colored

#### Lead in CRT

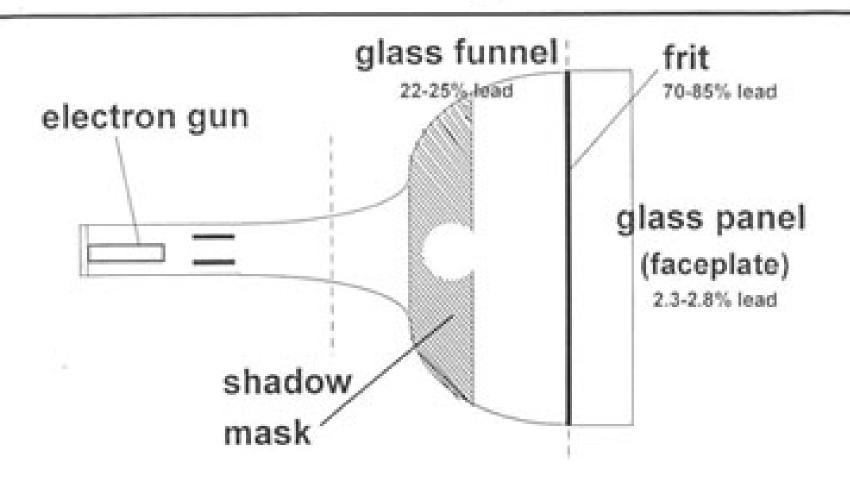




#### Lead in CRT



# **CRT Components**



## CRT





#### Lead in CRT



- Highest lead level is found in the funnel glass
- Average TCLP lead level was 75.3 mg/L
- The source is the Frit Seal in the funnel glass of color CRTs
- Monochrome CRTs passed TCLP

#### Monochrome CRT





## Monochrome CRT





#### Lead in CRT



Lead Content in CRT Glass Components by Mass <sup>1</sup>		
Glass	Color CRT	Monochrome CRT
Panel	0% - 3%	0% - 3%
Funnel	24%	4%
Neck	30%	30%
Frit	70%	N/A

<sup>1.</sup> S. Musson, Y.C. Jang and I.H. Chung. <u>Characterization of Lead Leachability from Cathode Ray Tubes using the Toxic Characteristic Leaching Procedure</u>, University of Florida – Florida Center for Solid and Hazardous Waste Management, December 1999

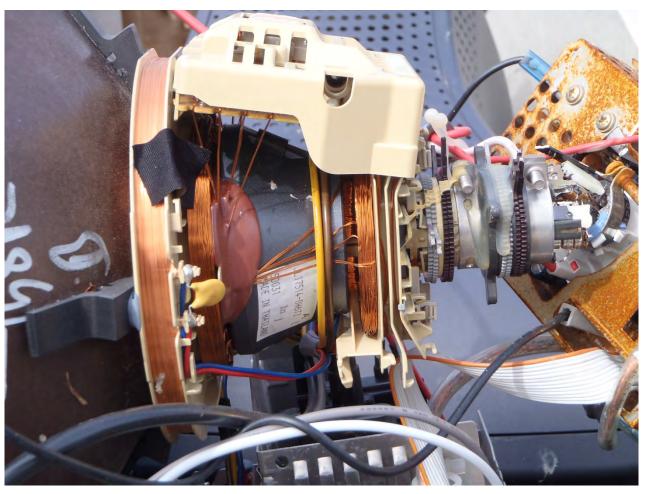
## Case Studies



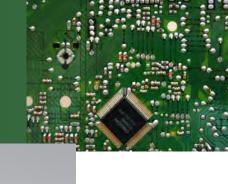


## Case Studies





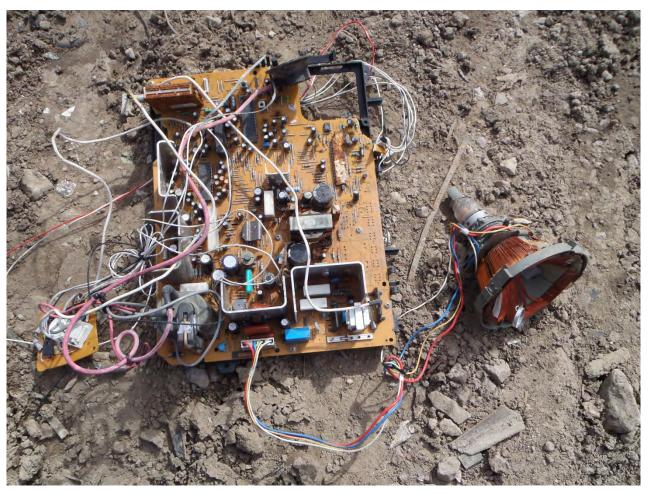
# Case Study





## Case Studies







- Three guys breaking TVs to scrap copper parts and circuit boards
- IEPA
- East St. Louis Regulatory Affairs
- East St. Louis Police Department
- St. Clair County Sheriff's Department
- St. Clair County State's Attorney
- Property Owner OFS LTD (tax buyer)
- Towers RP1
- Brown RP2

















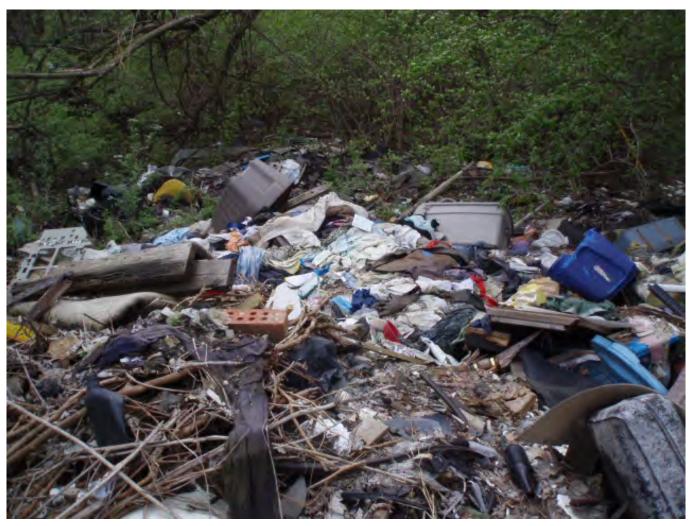




















#### Interview



- Interview suspects Towers
- From closed TV repair shop in Swansea, IL
- Rent-A-Center would not say which one
- Later changed story
- Picked up off the street

#### **Evidence Collection**



- Collect Samples
  - Sampling and Analysis Plan
  - Site Safety Plan
  - Arrangement with lab
  - Selection of bottles
  - Selection of PPE
  - Sample Prep
  - Chain of Custody
  - Internal SOP

# Sample





# Prepared Sample





#### **Lead Levels**



- Total amount of lead in sample 1,330 mg/Kg
- TCLP lead level 297 mg/L
- Other constituents
  - Aluminum
  - Barium
  - Boron
  - Iron
  - Strontium
  - Zinc
  - Selenium
  - Antimony

# Referred to St. Clair County State's Attorney



#### Brown and Towers

- Charged at the scene with Illegal Dumping ESL
  Petty Offense Dismissed
- 2 counts of Criminal Disposal of Waste w/o a permit -Class 4 felony
- Causing or allowing open dumping Class A
  Misdemeanor
- Causing or allowing open burning Class A Misdemeanor

# Referred to St. Clair County State's Attorney



#### OFS LTD

- Knew the TV operation was going on when purchased the property at a tax sale. May not have know extent of operation.
- Causing or allowing open dumping Class A Misdemeanor
- Causing or allowing open burning Class A Misdemeanor

IEPA issued OFS, Towers and Brown VNLs

### The Cleanup



- OFS LTD Cleaned up the site
  - 77 tons of garbage
  - 64 pounds of e-waste
  - 14.3 tons of CRT glass with some soil as lead hazardous waste (D008) to Michigan
  - 120 tons of non hazardous lead contaminated soil to Milam Landfill
  - About \$50,000

### East St. Louis/Towers





#### **Enforcement**

- OFS LTD Charges Dropped (Feb 2014)
- November 2013 Towers plead guilty to
  - Arrested by SCC Sheriff's Dept. (9/2013)
  - Causing or allowing open dumping Class A
    Misdemeanor
  - Causing or allowing open burning Class A Misdemeanor
  - 12 months probation
  - \$1,800.00

#### Enforcement



#### Brown

- Arrested SSC Sheriff's in November 2013
- Plead guilty to the two misdemeanor charges
- 12 months probation
- \$1,500 fine
- Got truck back



- 24 year male collecting TVs and monitors from closed businesses and residence
- Scraping TVs and monitors of copper and circuit boards
- Open dumping and open burning
- 24 year diagnosed with sever Bipolar Disorder
- Dealt with parents

































- Took some TVs to Eagle Recycling
- Removed funnel glass
- Disposed of panel glass and shells in landfill
- Two 55-gallon drums of broken funnel and neck glass
- Picked up by Clean Harbors Environmental Services
- \$594.76 per drum



- The Electronic Products Recycling and Reuse Act
- Collector
  - Register as a Collector with IEPA
  - Submit an annual report with IEPA



- If they also take CRTs from businesses
- Title 35 Illinois Administrative Code 721.139: Conditional Exclusion for Used, Broken CRTs and Processed CRT Glass Undergoing Recycling
- CRTs are not solid wastes if they are destined for recycling and the meet the following requirements:



- Storage
- Broken CRT must be managed in either of the following ways:
  - They are stored in a building with a roof, floor and walls or
  - Container (vehicle or package) that is constructed,
    filled and closed to minimize a release



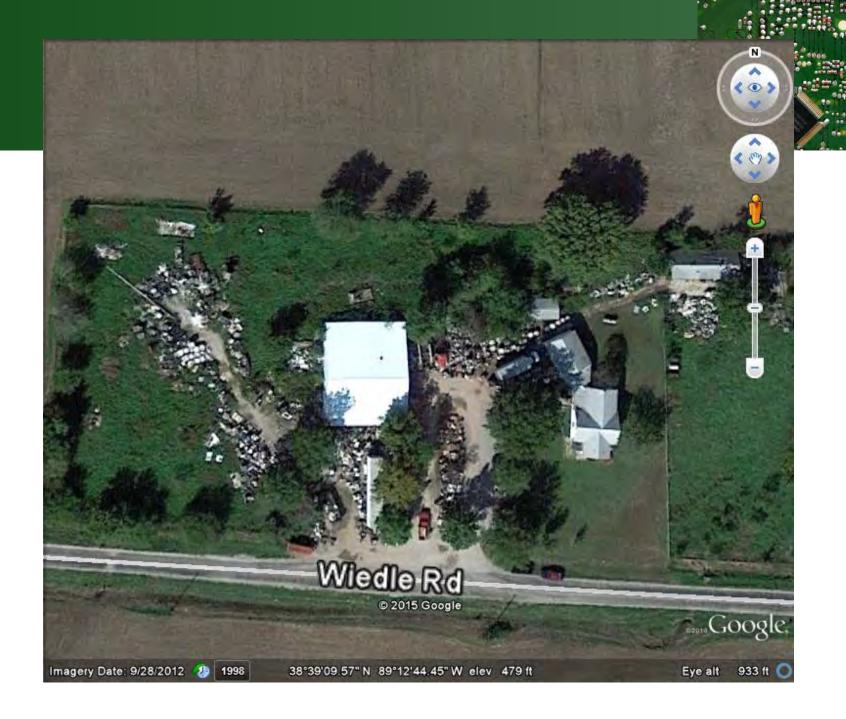
- Labeling
- Each container labeled
  - Used cathode ray tubes containing leaded glass; or
  - Leaded glass from televisions or computers
  - AND
  - Do not mix with other glass material



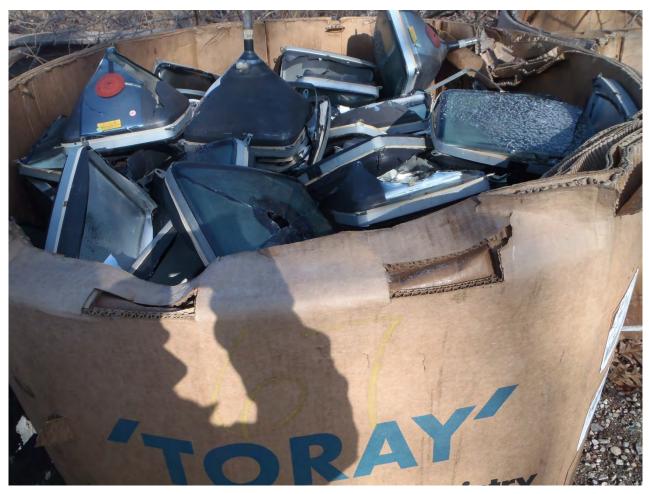
- No Speculative Accumulation
  - Recycle at least 75% in a calendar year
- No Use Constituting Disposal



- Registered Collector
- Per the 2014 annual report Eagle collected 16,602 pounds of CED
- Of that 2,300 pounds of Monitors and 3,975 TVs
- Collects from community sponsored electronic collections "one-day events"
- Not keeping residential CRTs from business CRTs
- Regulated by 35 IAC 721.139





















































#### Violation Notice

- Store CRTs inside or in a container
- Label
- And recycle
- Recycle other CED end speculative accumulation
- Cease operating as a recycler
- Cease open dumping and open burning
- Waste to landfill
- CCA

## CRTs in Open Dumps





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#### Questions?



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