

July 20, 2015

Brad Frost, Mail Code 5
Re: Electronic Waste
Illinois Environmental Protection Agency
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 62794-9276

Re: July 29th Public Hearing on IL Electronic
Product Reuse & Recycling Act

Dear Mr. Frost;

As electronics recyclers serving the material recovery needs of the State of Illinois, we respectfully call your attention to the following critical information related to proposed modifications to the Illinois electronic recycling program to be discussed at the upcoming July 29, 2015 public hearing.

Those among us who will be attending the hearing will provide comment on a number of issues. For the purposes of this group letter, however, we would like to focus your attention on the discussion around rescinding the landfill ban on electronics disposal, particularly on hazardous CRT units.

We understand that on July 10th the Governor signed HB1455 to amend the Electronic Products Recycling & Reuse Act. This bill allows manufacturers to count the total weight of a CRT toward its goal if “all recyclable components are removed from the device” and the CRT glass is managed in a manner that complies with all ILEPA regulations for handling, treatment and disposition of CRTs. The assumption here is that the CRT glass is not recyclable. We would like to draw your attention to the following data indicating that, in fact, this is not the case

According to the ILEPA 2014 and 2015 Reports to Governor Rauner and the General Assembly, the annual volume of CRT glass collected under the Act dropped by over 8% (~2 million pounds or ~1,000 tons) over the one-year period. This trend will continue since no new CRT products are being sold in the US.

CRT Glass Produced Under the IL Act 2013-2014

Program Year	TVs¹ Lbs./Tons	Monitors² Lbs./Tons	Total Tons	CRT Glass 70%³	% Decrease in CRT Volume
2013	27MM/13.5M	5MM/2.5M	16M	11,200 Tons	
2014	26MM/13M	3.5MM/1.75M	14.75M	10,325 Tons	8%

Illinois has one of the best CRT glass recycling markets in the US, with one company alone having the capacity to process 62,000 tons/year as a substitute raw material in ceramic tile

¹Includes flat-panel TVs so actual number of CRT pounds collected is lower

² Includes flat-panel monitors so actual number of CRT pounds collected is lower

³ Approximately 70% of the weight of complete CRT products is the CRT glass

glaze. Another 24,000 tons of CRTs are recycled each year at a neighboring Missouri smelter and 6,650 tons of panel glass per year are being repurposed for new products in Kentucky. Significant additional capacity is available in other states and countries.

2015 Illinois CRT Recycling Market Capacity

IL CRT Glass Collected 2014	IL CRT Recycling Capacity 2015	MO/KY CRT Capacity 2015	Total Regional CRT Recycling Capacity 2015	Total Excess CRT Recycling Capacity IL 2015
10,325 Tons	62,000	30,650	92,650	82,325 Tons

The following additional facts must be understood before any consideration of rescinding Illinois' ban on landfilling CRT glass:

1. WI, MN and IN all share the same e-recycling market as IL and none are considering rescinding their landfill bans.
2. WI and MN have banned any allowance for landfilling of CRT glass in any manner under their state recycling programs.
3. The cost of recycling CRTs does not exceed the cost of long term environmental impacts of landfilling CRT glass.
4. CRT glass contains valuable resources that should be recovered under a state *recycling* act, not landfilled.
5. The Electronic Product Recycling & Reuse Act was intended to do just that: Recycle and reuse electronics and keep them out of landfills. Allowing a landfilling provision under the guise of recycling deceives the citizens of Illinois and dishonors their best intentions to recycle.

In recognition of the above, we urge the ILEPA and the State of Illinois to uphold the intent of the Electronic Product Reuse and Recycling Act, including the landfill ban.

We look forward to participating in the July 29th public hearing and appreciate the opportunity to do so. Please direct any questions prior to the meeting to LRoman@TransparentPlanetLLC.com for consideration by and response from our group.

Respectfully,

Mark Domnenko, President – AVA Recycling
 Neil Peters-Michaud, CEO – Cascade Asset Management
 Catherine Wolff, President – CJD E-Cycling
 Saheem Baloch, President – COM2 Recycling Solutions
 Scott VanderKooy, President – Comprenew
 Jim Taggart, CEO – ECS Refining
 Aaron Blum, Cofounder and Chief Compliance Officer – Electronic Recyclers International
 Steve Gossman, Warehouse Manager – E-Scrap Technologies
 Eugene Melnitsky, President – Genesis Electronics Recycling
 Kenneth Gravitt, President-CEO – Global Environmental Services
 Tom Bolon, CEO - Novotec

Steve Skurnac, President - SIMS Recycling Solutions
Jade Lee, President-CEO – Supply-Chain Services