



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Arnold Schwarzenegger
Governor

January 25, 2008

Certified Mail No:

Waste Tire Products
3820 Highway 99
Orland, California 95963
Attn: William H. Tasto, Owner

RE: Unauthorized CRT Glass Breakage

Dear Mr. Tasto:

On December 20, 2007, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) conducted a focused compliance inspection of Waste Tire Products (WTP), 3820 Highway 99, Orland, California. During that inspection, DTSC observed WTP removing yokes from Cathode Ray Tubes (CRTs) and placing CRTs with broken glass "necks," or electron guns (of various lengths) on wooden pallets. During the inspection, some broken electron gun glass was found surrounding the treated CRTs that indicated a release. You, Mr. William Tasto, said that the glass was broken to release the vacuum seals before the yokes were removed from the CRTs. However, intentional breakage of CRT glass requires a higher level of authorization from DTSC than the authorization WTP currently has. To obtain authorization to break CRT glass, a recycler must notify DTSC 30 days prior to recycling or treating CRT materials and file the documents listed below:

1. Cost estimate for closure of the facility, as specified by Cal. Code Regs, Tit. 22, section 66273.83(d)(2);
2. Documentation demonstrating financial assurance for closure, as specified by Cal. Code Regs, Tit. 22, section 66273.83 (d)(3);
3. Documentation demonstrating financial responsibility for liability, as specified by Cal. Code Regs, Tit. 22, section 66273.83(d)(4).

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After the inspection, a Summary of Violations (SOV) documenting two Class II violations was issued to WTP. One of the Class II violations cited was Cal. Code Regs, Tit. 22, 66273.83(c)(1) for breaking glass while conducting yoke removal. WTP must immediately stop breaking CRT glass without authorization. A Class I violation will be documented if DTSC observes unauthorized glass breakage during future inspections. Class I violations carry substantial penalties to the facility in addition to corrective action requirements.

For some TV models, such as RCA-brand TVs, it may be difficult or impossible to remove yokes without breaking the CRT electron gun glass. Such models should be accumulated separately and sent to an e-waste recycler(s) who has authorization to break CRT glass. Furthermore, you may consider referring to brand-specific repair manuals for suggested and model-appropriate methods for conducting dismantling.

If you have any questions, feel free to contact me by phone: (916) 255-3613; fax: (916) 255-3595 or by email: sbalacha@dtsc.ca.gov.

Sincerely,

Saro Balachandra
Hazardous Substances Scientist
State Oversight and Enforcement Branch

cc:

Dr. Sangat Kals, Section Chief
State Oversight and Enforcement Branch
Enforcement and Emergency Response Program
Department of Toxic Substances Control
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