

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

SEPTEMBER 14, 1989

MEMORANDUM

SUBJECT: Status of Solid Waste Export Data Gathering

FROM: Devereaux Barnes, Director  
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TO: Wendy Grieder  
Office of International Activities

We have been asked by Cathleen Corken at the State Department to provide a summary of the information we have gathered to date relating to the export of solid waste. When your office relays this information to Ms. Corken, please make it known that the information is preliminary and should be marked as "draft." The information is not the result of an exhaustive research effort, but rather, a rather quickly conducted telephone survey. However, this information does represent the knowledge of this Branch on the topic of solid waste export at the current time.

The major findings of our preliminary inquiries are as follows:

- Many categories of solid waste are being exported in significant quantities. For example:
  - 9 million tons of iron and steel scrap exported in 1988.
  - 1 million tons of non-ferrous metal scrap exported in 1988.
  - 3.5 to million tons of paper waste and scrap exported in 1987 (Corps data).
  - 5.6 million tons of used paper was exported in 1988 (American Paper Institute data).
  - Unknown quantities of plastic waste.
  - 270,000 tons of textile waste and scrap exported in 1987.
  - Unknown quantities of waste batteries.
  - Approximately 25,000 tons of asbestos is exported annually.
- Municipal incinerator ash is not being exported in significant quantities at the present time.
- Municipal solid waste (trash and/or garbage) is not being exported in significant quantities at the present time.

## CURRENT STATUS OF THE DATA

### 1. U.S. Department of Commerce

Numerous categories of solid waste are exported from U.S. ports to foreign destinations. The U.S. Department of Commerce, Bureau of Census, tracks the export of commodities with economic value equal to or greater than \$2500. A list of schedule B Numbers for waste categories of economic value is in Attachment A as well as some data on scrap metal exported. Information regarding quantities of waste and destination can be obtained for all categories with schedule B numbers. Attachment B represents the data obtained from the Department of Commerce on the export of asbestos (Schedule B # 2524.00) for the first five months in 1989, with the last two columns representing estimated values for the year 1989. It is not clear whether this category represents waste asbestos or a virgin asbestos product or commodity.

### 2. Institute of Scrap Metal Recycling Industries

Data on the export of metals were obtained from the Institute of Scrap Metal Recycling Industries (ISMRI). Attachment C represents by type iron and steel scrap metal totaling 8.9 million tons exported in 1988 and Attachment D represents by type nonferrous scrap metal totaling 890,000 tons (or 1,787,305,449 pounds) exported in 1988.

### 3. U.S. Army Corps of Engineers

The U.S. Army Corps of Engineers in New Orleans collects data from the Bureau of Census on the shipping of waste products to foreign countries from U.S. ports. Attachment E represents quantities of waste exported in 1987 with iron and steel scrap totaling 9.4 million tons, nonferrous metal scrap totaling 876,000 tons, paper waste and scrap totaling 3.4 million tons, and textile waste scrap and sweepings totaling 272,000. These figures for the two scrap metal categories approximate the figures obtained from ISMRI.

### 4. Journal of Commerce

Limited information has been obtained from the Journal of Commerce subsidiary, "Piers", which indicates that many categories of solid waste are exported. Piers is a private entity that obtains information from the shipping manifests for all exports from all U.S. Ports, and enters the information into a database. All categories of exported material have or are given a code regardless of economic value. A search of key words in the Piers database indicates many categories of solid waste are exported including: leather scrap, tobacco scrap, food wastes, waste paper, textile waste, fiber wastes, scrap metals, waste batteries wet and dry cell, plastic waste, film waste, cellulose waste, polystyrene scrap, resin waste, waste ink, etc. Attachment F is the printout of the Piers waste

categories revealed in response to our key word search. A purusal of the category list does not reveal categories for municipal garbage or trash, or municipal incinerator ash exported.

We are currently awaiting additional data from Piers which will quantify by receiving country tonnage per “waste” or “scrap” commodity type for a three month period in 1989.

##### 5. Municipal Solid Waste and Municipal Incinerator Ash Export Various Sources

The results of an on-going telephone survey to waste brokers, incinerator operators, State and Federal environmental regulatory agencies, waste management associations and companies, environmental organizations and others indicates that significant quantities of municipal solid waste and municipal incinerator ash are not presently being exported from the United States. However, there is currently no tracking mechanism or notification mechanism for such exports. Therefore, there is no way to know if these wastes are being exported. And, based on information EPA is receiving inadvertently (i.e. notifications or requests for information regarding solid waste exports) and information related by phone there appears to be an increase in proposed activity and interest in the area of solid waste export in recent years. However, in spite of our lack of definitive knowledge in this area, we believe that significant quantities of municipal solid waste and municipal incinerator ash are not being exported at the present time.

EPA's Solid Waste Task Force estimate's that from two to four million tons a year of incinerator ash is generated in the U.S. at the present time. A survey of 121 Municipal Waste Combustion Incinerators revealed 11 facilities that did not state the location of their ash disposal. All others indicated ash disposal locations in the U.S. The eleven are being contacted. Several have indicated by phone they dispose of their ash in the U.S. One indicates he sends “a few pounds” overseas for research.

There is various anecdotal information on shipments of trash and ash that have occurred including the two shipments of Philadelphia incinerator ash (one aboard the Khaian Sea, the other deposited in mine in a West African country and then retrieved and returned to Philadelphia and ultimately disposed in Ohio), as well as the infamous Long Island garbage barge. The Paolino family in Philadelphia who arranged with brokers for the Philadelphia ash exports indicate that the above mentioned were the only two occasions in which they exported ash.

A contact at the Long Island Commission on Ash relates that he has been approached many times by brokers with proposals for export of Long Island incinerator ash to various. developing countries. They are in fact considering a proposal at the current time. So far they haven't made any contracts to ship ash, but the impetus to do so is great and he wouldn't be surprised to learn others are exporting ash. However, he hasn't heard of anyone doing it, and at the present time he's sure no Long Island ash is being exported. Long Island generates 1000 tons of ash a day. Seven hundred tons a day leaves Long Island going to various landfills.

There is anecdotal information of proposals to export ash to Belize, Panama, Haiti, and New Guinea, municipal garbage to the Sabrina Islands, to the Mariana Islands (in the Pacific), to

Guinea-Bissau, to the Dominican Republic, petroleum waste to Chili. Municipal incinerator ash was deposited in Haiti on one occasion. The other proposals have apparently not been carried out.

Other anecdotal information includes that of a waste exporter in Oregon who relates that he exports material which he calls “metal-containing material” which would be hazardous according to RCRA if it weren't exempt from regulation by virtue of being “a product”, or “an ingredient”. He receives hazardous waste from many companies, it's unclear to what extent he “treats” it, before exporting it for use as products or ingredients. He says many other companies also do this.

cc: w/o attachments  
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