Message

From: Vance, Ronald [Vance.Ronald@epa.gov]
Sent: 10/28/2020 7:19:59 PM
To: Fite, Betty [bfite@eastman.com]
CC: Trey White [Trey.White@tn.gov]; Alfano, Barbara [Alfano.Barbara@epa.gov]; Ashby Barnes [Ashby.Barnes@tn.gov]; Charick, Kim [Charick.Kim@epa.gov]; Janjic, Ksenija [Janjic.Ksenija@epa.gov]; Riegerix, Rachelle [Riegerix.Rachelle@epa.gov]
Subject: RE: Do you accept chemical recycling (molecular recycling) products?

Hello Betty. Apologies for the delay in getting you a direct response. We received your inquiry through a variety of channels and there was some confusion on who was sending a response and if the response was sent.

The CPGs do not specify whether or not chemical recycling is within the definition of recycled content or excluded from the definition. As you might be aware, we are reviewing CPGs currently for potential updates and this is one item that will be included in that review. However, that means that we do not have a direct answer for you at this time.

In addition, we are working within the America Recycles effort to better define terms. In that process, which is still underway, we are working on a list of definitions. We have spoken with ACC and have developed a differentiation amongst mechanical recycling and chemical recycling. In addition, we have developed more distinction within the chemical recycling space and instead of using the term chemical recycling we are instead going to use the terms depolymerization, gasification, pyrolysis, and solvolysis.

Work on both of these items will be occurring in 2021 and more details will be released as we work through those processes.

Thank you,
Ron Vance, Chief
Resource Conservation Branch
U.S. Environmental Protection Agency

From: Ashby Barnes <Ashby.Barnes@tn.gov>
Sent: Wednesday, October 28, 2020 12:59 PM
To: Charick, Kim <Charick.Kim@epa.gov>
Cc: Trey White <Trey.White@tn.gov>; Vance, Ronald <Vance.Ronald@epa.gov>; Alfano, Barbara <Alfano.Barbara@epa.gov>
Subject: RE: Do you accept chemical recycling (molecular recycling) products?

Kim,

Thank you for your email.

Ron, could you please share the response you sent to Eastman so I can share it with my colleagues? Thank you.

Regards,
Ashby

TN Department of Environment & Conservation

Ashby Barnes, P.G. | Environmental Scientist
Div. of Solid Waste Management | Materials Management Programs

William R. Snodgrass Tennessee Tower, 14th Floor
312 Rosa L Parks Ave, Nashville, TN 37243
Ex. 6 Personal Privacy (PP)
Email: Ashby.Barnes@tn.gov
www.tn.gov/environment

https://www.tn.gov/environment/program-areas/solid-waste/materials-management-program/recovered-materials.html

We value your feedback! Please complete our customer satisfaction survey

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From: Charick, Kim <Charick.Kim@epa.gov>
Sent: Wednesday, October 28, 2020 11:14 AM
To: Ashby Barnes <Ashby.Barnes@tn.gov>
Cc: Trey White <Trey.White@tn.gov>; Vance, Ronald <Vance.Ronald@epa.gov>; Alfano, Barbara <Alfano.Barbara@epa.gov>
Subject: [EXTERNAL] RE: Do you accept chemical recycling (molecular recycling) products?

Ashby:

It's best if you reach out to Ron Vance directly. I've spoken to Ron and it seems that Eastman has contacted multiple EPA Regions asking the same question. In order to be responsive to Eastman, the EPA response should go to one person and my understanding is that Ron was going to take care of it.

Thanks, hope this helps! I've included both Ron and my manger on this email so we're all in the loop.

~Kim

From: Ashby Barnes <Ashby.Barnes@tn.gov>
Sent: Wednesday, October 28, 2020 12:04 PM
To: Charick, Kim <Charick.Kim@epa.gov>
Cc: Trey White <Trey.White@tn.gov>
Subject: RE: Do you accept chemical recycling (molecular recycling) products?

Kim,

Were you ever able to get a response from your colleagues concerning the questions from Eastman?

Please note, I changed my email address, I dropped the "R" in front of Ashby.

Regards,
Ashby

TN Department of Environment & Conservation

Ashby Barnes, P.G. | Environmental Scientist
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312 Rosa L Parks Ave, Nashville, TN 37243
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From: R.Ashby Barnes
Sent: Friday, August 28, 2020 4:21 PM
To: Charick, Kim <Charick.Kim@epa.gov>
Subject: Re: Do you accept chemical recycling (molecular recycling) products?

Kim,

I wanted to check up on these questions from Eastman Chemical.

Regards,
Ashby

From: Charick, Kim <Charick.Kim@epa.gov>
Sent: Wednesday, July 22, 2020 1:32 PM
To: R.Ashby Barnes <R.Ashby.Barnes@tn.gov>; Newman, Alan <Newman.Alan@epa.gov>
Cc: Trey White <Trey.White@tn.gov>; Alfano, Barbara <Alfano.Barbara@epa.gov>
Subject: [EXTERNAL] RE: Do you accept chemical recycling (molecular recycling) products?

Ashby:

Thanks for reaching out to us. I've reached out to some of my colleagues and should have some information for you shortly.

Thanks,
Kim

From: R.Ashby Barnes <R.Ashby.Barnes@tn.gov>
Sent: Wednesday, July 22, 2020 2:22 PM
To: Charick, Kim <Charick.Kim@epa.gov>; Newman, Alan <Newman.Alan@epa.gov>
Cc: Trey White <Trey.White@tn.gov>
Subject: Fwd: Do you accept chemical recycling (molecular recycling) products?

Kim and Alan,

How are you doing?

Below are some questions from Eastman Chemical in Kingsport, TN. I spoke with Betty Fite and she said that she had spoken with someone at EPA Region 5 who couldn't answer her questions but would forward them to D.C., and then a receptionist at EPA Region 4 who said she should speak with someone here at TDEC.

If you are not the people that could answer the questions, could you please forward the email to correct contact person and include Trey White (Trey.White@tn.gov) and I in the correspondence?

Thank you for your help with this.

Regards,
Ashby Barnes

Department of Environment & Conservation

R. Ashby Barnes, P.G. | Environmental Scientist
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From: Fite, Betty <bfite@eastman.com>
Sent: Tuesday, July 21, 2020 9:17 AM
To: R.Ashby Barnes <R.Ashby.Barnes@tn.gov>
Subject: [EXTERNAL] Do you accept chemical recycling (molecular recycling) products?

Hi Ashby, it was so nice to talk with you yesterday. We are very interested in the RCRA's recycling program and we are requesting EPA's support for our molecular recycling process. We have a few questions about the Comprehensive Procurement Guidelines (CPG) program.

- **How do we qualify our molecular recycling products/process**?
- Are molecular recycled products are accepted for the CPG product list?
- Does EPA have any guidelines or regulations on ways to engage in the program?

Our CEO, Mark Costa is an advocate of creating a true closed-loop process for hard-to-recycle plastics.

We are currently working on two initiatives to create a circular economy:

- **Carbon renewal technology, or CRT**, which breaks down waste plastic feedstocks to the molecular level before using them as building blocks to produce a wide range of materials and packaging. The company claims this enables waste plastics to be recycled an infinite number of times without degradation of quality.
- **Polyester renewal technology, or PRT**, which involves taking waste polyesters from landfills and other waste streams and transforming them back into a raw material that the company claims is indistinguishable from polyester produced from fossil-fuel feedstocks.

Any information you can provide is appreciated.

Thank you very much for your time,
Betty

Betty Fite | Eastman
Paralegal II
200 Wilcox Drive – Bldg. 280
Kingsport, Tennessee 37660
Ex. 6 Personal Privacy (PP)

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