



## IPMI

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## International Precious Metals Institute

- **The IPMI was founded in 1976**
- **Core founding group composed primarily of research professors from some of the most prestigious universities in the USA:**
  - **Cornell**
  - **Massachusetts Institute of Technology (MIT)**
  - **Columbia**
  - **New York University (NYU)**
  - **Princeton**
  - **New York Brooklyn Polytechnic**
  - **and others**
- **Many of these schools & professors had projects funded by a host of corporate entities, from the USA and Europe including;**
  - **Degussa**
  - **Heraeus**
  - **Engelhard (now BASF)**
  - **Matthey Bishop (now Johnson Matthey)**
  - **Union Miniere, Metallurgie Hoboken-Overpelt (now Umicore)**



- **The IPMI was then chartered & founded in 1976.**
- **NOT as a “trade association, but an IRS registered IPMI 501(c)(3) “non profit, charitable organization”**
- **Whose mission was & remains:**
  - **Advancing knowledge of the precious metals**
  - **Working closely with governments and associated agencies on any & all projects involving precious metals in any way.**
- **1<sup>st</sup> major project; working with EPA from 1979 thru 1989 on developing language for “solid waste” & “hazardous waste”.**
  - **Language pertaining to a “precious metals exclusion” in both regulations is virtually verbatim from the input provided by IPMI**
  - **Most recently, IPMI worked from 2014 thru today with USTR in RE precious metals and their involvement in the TTIP negotiations.**
  - **We also currently have an on-going project involving members of Congress and the FTC in RE a “made in America” review**



## Summary Points and Suggestions from the IPMI for the Negotiated rulemaking committee efforts to limit CDR requirements for inorganic byproducts under TSCA

### CDR reporting is difficult for these materials:

- Making the CDR report accurately is difficult with isolated byproduct intermediates: often they are a mix of several processes, repeatedly recycled
- Accurate records of these quantities and components not always available.
- Multiple record sources and terminologies exist for these streams.
- Reporting preparation often takes more than a month of work per site. Half to three quarters of this time could be eliminated with eliminated or modified reporting.



## Summary Points and Suggestions from the IPMI

- **Exempt extraction of a previously formed inorganic chemical or base metals from recycling processes entirely. The base inorganic substance has already been accounted for in the EPA inventory when initially made. (Extracted from ore for commercial purpose). Do cover new compounds manufactured with the base metal when made as sold chemicals.**
- **Exempt the byproduct from extraction using a plain meaning definition of “extraction” – meaning a broader, unrestricted definition of extraction vs that shown in guidance.**



- **Ease burden on recycling industry. Only report products sold not intermediates or byproducts. This would put recycling chemicals near the same burden as wastes reporting.**
- **Exempt imports for chemicals that are on the TSCA inventory that are feed to recycling industry. Especially inorganic byproducts.**
- **Exemption of these recycled streams reporting if solely kept on site since they are only reportable because they are temporarily isolated.**
- **Since worker exposure is to the whole mixture vs individual components allow industry development of agreed UVCB mix stream names and descriptions (as was done in the petroleum industry) to simplify CDR reporting.**



## Questions?