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Subject: Comments Regarding the Proposed Regulations for a Hazardous Waste Program
To whom it may concern,

On behalf of Green Star of Interior Alaska (GSIA), I am submitting comments in response to ADEC's Proposed Regulations for a Hazardous Waste Program. Specifically, we have concerns regarding the inclusion of "electronic waste" as a Universal Waste.

GSIA collects, stores, packages, and backhauls electronic waste (e-waste) generated by residents and businesses of Fairbanks North Star Borough and many municipal and tribal entities throughout Interior Alaska. In addition, we operate reuse and refurbishment programs that offer laptop and desktop computers both for free and for reduced cost in our storefront.

In providing our e-waste collection services to the community, it would appear that we would be designated as a "handler" of "Universal Electronic Waste." With the designation we would have to comply with the labeling, containment, and accumulation requirements. It is unclear how a declaration of e-waste as Universal Waste will affect our ability to sort reusable electronics from e-waste destined for recycling. In addition, the reporting requirement does not seem to account for this possibility. Please clarify whether refurbished or re-used electronics will be subject to these regulations.

As a regional hub for e-waste backhaul from rural communities, many of the entities that ship to us have limited and expensive shipping options. The most effective way for our community to backhaul is by barge. Shipping in Alaska is expensive, so maximizing the amount of electronic waste loaded in a container is the most cost-effective means of backhauling. Often that requires storing items in larger quantities for long periods to make backhaul shipments affordable. The proposed regulations appear to punish this cost-saving measure, and any exemptions to the one year accumulation limit are not clear.

We wish to continue providing this e-waste collection and backhaul services to our community. The proposed "Universal Electronic Waste" regulations create additional financial, administrative, and operational challenges to our program which is already difficult enough to maintain. We hope ADEC reconsiders the "Universal Electronic Waste" portion of the proposed regulations. It does not promote or streamline the recycling of electronic waste, but in fact risks creating the opposite effect.

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