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With regards to 18 AAC 62.205, does the definition in 18 AAC 62.1390 include other ancillary equipment such as excess plugs and cables to be disposed of, battery chargers? I like the purpose behind this regulation, and I think it would inadvertently improve recycling opportunities to the state as a whole, but I also can see a potential issue with how a generator would establish electronics as electronic waste. For other categories of universal waste, (i.e. waste lamps, waste batteries, and waste aerosol cans) it is easy to distinguish when they become a waste due to them still functioning as needed, batteries and lamps when removed from a piece of equipment, or in the case of aerosol cans, when they no longer have product in them. Aside from when electronics can easily be deemed as waste, i.e. being broken or thrown away, how will old, still usable, electronics being stored in some closet be interpreted in the eyes of ADEC? Additionally, would there be any issue with the shredding of circuit boards for handlers of universal waste? If whatever is destroyed is all managed as Universal Waste Electronics, would that be compliant or would this be deemed as some form of treatment?

Additional comments/requests:

Would the ADEC be able to add Polychlorinated biphenyls (PCBs) to being a state specific coded waste? Oregon state's department does this well and it removes any ambiguity with PCB disposal in the state of Alaska given none of the landfills accept any of it.

Lastly, Washington Sate's Department of Ecology has a state specific coded waste of WT02, which I think Alaska should adopt something similar, given how much of our economy relies on resource harvesting, both for fishing and hunting, along with all the guide services that come with that, doing more to protect these resources from releases of potential toxics substances should be a priority. Tracking wastes like this may help prevent said releases.