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Rebecca Colvin  
ADEC Division of Environmental Health  
555 Cordova St.  
Anchorage, AK 99501

**Subject: Comment on Proposed Regulations for a Hazardous Waste Program**

**Dear Ms. Colvin,**

The City and Borough of Juneau (CBJ) runs a household hazardous waste (HHW) collection program. (You can find more information on our program here: <https://juneau.org/engineering-public-works/recycleworks2/hazardous-waste>).

CBJ's Household Hazardous Waste Facility only accepts household hazardous waste/universal waste from residents and from commercial very small quantity generators (VSQGs) and is currently classified as a conditionally exempt very small generator (CESQG).

From the draft regulations, it is hard to ascertain if our HHW program would remain a CESQG. CBJ is therefore concerned about what level of oversight and regulatory burden our facility can expect from the proposed program. We request clarity on the requirements for HHW programs which provide invaluable environmental services for their residents.

Sincerely,

Dianna Robinson  
Environmental Project Specialist  
Engineering & Public Works Department

Cc: Denise Koch, CBJ Director of Engineering & Public Works