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I did not note many substantive changes to the federal regulations in the published draft regulations for the AAC. For electronic wastes, if these types of wastes are recycled, they are for the most part, exempt from the hazardous waste regulations. Considering most of these types of waste would realistically need to be reclaimed, and therefore not exempt, there is no current sampling technique that I am aware of that could satisfactorily characterize any particular e-waste destined for disposal. Similarly, I do not believe any generator out there, as it is defined, would ever comply with characterizing these types of wastes using any model under the current requirements. They certainly do not currently do this. The addition of these types of wastes as a -1-universal waste-1- appears to have some merit in addressing the prior issues, however, the EPA has done extensive research on this waste class, and I believe that there are already actions being taken to revise the existing federal regulations to address these types of wastes in a way that increases compliance and reduces hazardous waste generation. To that end, I do not see a benefit for Alaska to create and administer their own hazwaste plan. Existing federal regulations are complex and appear stringent enough, appear likely to be revised soon to address e-wastes, and I do not believe adding another set of regulations with minor changes for folks to keep up with is beneficial, cost effective, or would increase compliance in any measurable way.

Other revisions are outside of my area of expertise and appear to relate to soil/groundwater cleanup levels and criteria. As such, my input is limited. However, if the ADEC proposes modifying the federal standards for any one constituent of concern, or in how sampling and analysis of those is performed, I believe that decision should be based on scientific data showing that there is an actual threat to persons or the environment under current criteria, that the proposed changes have been shown effective in reducing or eliminating those threats, that a cost to benefit analysis has been performed and shown to be reasonable and not overly burdensome, and that the data has had an opportunity to go through a public review and comment period prior to finalizing and publishing the data.