

Zender Environmental Health and Research Group

Attached are questions pertaining to the proposed regulations.

Thank you,

Reilly



Dear Ms. Colvin,

Thank you to ADEC for the extension to submit questions and comments pertaining to the *Proposed Regulations for a Hazardous Waste Program*. In preparation for providing comments by the October 30th deadline, we were hoping ADEC could provide some clarification regarding the following questions.

Questions regarding the definition of “electronic waste” as identified in 18 AAC 62.1390(c)(2)

Though the definition of "electronic waste" sites examples of smaller devices such as laptops, keyboards, copy machines, etc., the definition also states "*electronic waste* means a device that contains one or more circuit boards or other complex circuitry".

- Can ADEC please provide further clarification on what constitutes “electronic waste” – To what extent is something an electronic “device”?
 - Would this include large appliances (such as washers, dryers, refrigerators, stoves that contain circuit boards)?
 - Could this also include junk vehicles?
 - Would electronic components need to be removed prior to disposal or scrapping of larger items such as appliances and junk vehicles?
- If collected electronics will be screened for reuse (either the whole unit or components) by a recycler, would those electronics be considered “waste”?

Questions regarding Universal Waste Handlers as it pertains to “electronic waste”

Many organizations throughout rural Alaska have collection programs (both door-to-door and/or drop-off collection) that routinely collect, store, package, and ship electronics for recycling.

- Would an organization that provides this service to the community be considered Universal Waste Handlers under the proposed regulations?
- Would an organization that only collected electronics from households and VSQG be considered Universal Waste Handlers under the proposed regulations?
- Would an organization that provides this service be subject to the 1-year accumulation limit?
- Would an organization that collects electronics along with other Universal Waste items (such as lead acid batteries) in preparation for a backhaul shipment in excess 11,023 lbs be subject to the *standards for large quantity handlers of universal waste* (18 AAC 62.1130)?

Questions pertaining to notification requirements

The “Standards for electronic waste for universal waste handlers” 18 AAC 62.1135 (b) states “*A universal waste handler must notify the department of the quantity of universal electronic waste shipped to each individual recycling facility each calendar year...*”

- Does this notification requirement only applies to electronic waste and no other universal waste material?
- If so, why – what is the justification for only electronic waste having this requirement?
- How is ADEC going to use this information?
- To what accuracy does this need to be reported?
 - Can notifications be weight or volume estimates?
 - Would materials an organization ships to an intermediary (such as an organization the operates a regional backhaul program) instead of a recycler be subject to notification requirements?



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Questions pertaining to electronic recycling collection events

Many e-recycling collections events occur statewide annually. These events often allow for drop-offs from both household and businesses. Some events direct materials to in-state recyclers while others load containers onsite and ship materials to out-of-state recyclers at the conclusion of the event.

- Would the organization facilitating a collection event be considered a Universal Waste Handler under the proposed regulations?
- If a collection event anticipates receiving in excess of 11,023 lbs of electronics, would the event be subject to the *standards for large quantity handlers of universal waste* (18 AAC 62.1130)?

Thank you for considering these questions,

Reilly Kosinski