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UW is supposed to streamline the recycling of otherwise Hazardous Waste, but applying to Escrap in Alaska would do the opposite. There are Federal HW exemptions in place regarding CRT glass and circuit boards (assuming they are being recycled), so it seems like that would negate the need to designate it as Universal Waste.

In my opinion, the barriers to escrap recycling is lack of onsite capacity (to collect, package and store escrap), availability of labor, shipping opportunities, and funds. Designating Escrap as UW will not alleviate any of those obstacles. Further, it shortens the time folks can accumulate onsite and requires shipping every calendar year (which is costly). Communities already can't comply with the existing set of UW items (Fluorescents, Lead Acids, etc.) so this will just add to the noncompliance.

If the goal is to keep escrap out of the landfill and properly manage it, then it would make more sense to pass a regulation banning it from landfills and couple it with some sort of funding mechanism (such as Product Stewardship or comparable program) so folks actually have a shot at compliance.

Also weird that there seems to be a reporting requirement for ewaste, but no other UW item. Maybe I'm missing something in the proposed regs, but it's odd to call out escrap specifically for reporting to the State when it UW items like lead acids would be a more immediate threat to human health & the environment when improperly managed.

I also have issues with how "ewaste" is defined in the proposed and how to manage it if there's possibility of reuse (when is it waste if downstream recycles sort out items/components for reuse?)