

Minutes from the E-Waste Conference Call  
October 24, 2007

**“Qualified Reimbursable Costs for Approved Recyclers”**

Participants/Affiliation:

Tom Metzner – CT DEP – Moderator  
Kevin Sullivan – CT DEP  
Gabrielle Frigon – CT DEP  
Valerie Bodner – CT DEP  
Mark Latham – CT DEP  
Carey Hurlburt – CT DEP  
Gina Chiarella - We Recycle  
Valerie Rickman – ITI  
Chris Cleet - ITI  
Michael Conklin - Town of Wilton, CT  
Mike Bysdera - CRRA  
Kim O’Rourke – City of Middletown  
Nick Amman - Apple  
Joseph Fainer - Environmental Management Consulting  
Peg Hall - Town of Branford, CT & CRC  
Jean Cronin - Hughes & Cronin  
Lori Vitagliano – Regional Water Authority  
Colleen Ingemanson – CRT Recycling Inc.  
Cheryl Reedy – HRRRA  
Pam Roach – Town of Hamden  
Heather Bowman - HP  
Jeff Kuypers - HP  
Irene Rodrigues - Robinson & Cole  
Jerry Tyminski - SCRRA  
Joe Walkovich - Walkovich Associates  
Winston Averill - SCRRA  
Karen Weeks - The Kowalski Group LLC  
Andrea Byrne – Pitney Bowes  
Ray Graczyk – Northeast Lamp Recycling  
Doreen Zaback – Town of Wallingford

The DEP Moderator opened the call with Introductions, explained call protocol and referred everyone to: Chapter 415, Maine’s E-Waste Law, Section B on pages 3-4 entitled “Consolidator demonstration of technical ability and financial capacity”.

DEP provided a progress update on implementation of the law. The registration form has been mailed out to the manufacturers. The website pages on E-waste are nearly complete and should be posted soon.

In order to facilitate discussion on reimbursable costs, DEP suggested we reference the Maine regulations, Chapter 415, Section C on allowable costs.

Discussion began with transportation costs from a fixed location (e.g., a municipal transfer station) to a recycling facility. There was no comment or discussion on this cost.

The next cost was for “accounting by brand and manufacturer for CEDs and the collection of other required information”. A manufacturer asked about the capacity for side agreements so that their brand may be managed separately. DEP commented that the law allows for such side agreements between manufacturers and approved recyclers. A manufacturer asked about providing serial numbers to verify that the CED is theirs. DEP mentioned this could be a part of any side agreement.

The next potential cost was for “storing, loading and transport”. In this case it was understood to be the recyclers storing, loading and unloading. There was no additional comment.

The next cost was “packaging for transport”. A municipality raised the question for comment if the municipality’s cost of renting a container would be considered a reimbursable cost. Municipal representatives commented that they thought the cost of renting a storage container at a transfer station should be a qualified reimbursable cost. Representatives of the manufacturers stated they believed it is a collection related cost and therefore not eligible for reimbursement under the law. There was discussion about the type of container. Would a transporter box be considered as part of the transportation cost? Is this different than a “pod” or other container used only for storage and then unloaded into a trailer? A manufacturer maintained that both of these containers are part of the collection of CEDs and therefore not reimbursable under the law.

DEP asked the group whether the labor for unloading a storage container would be considered eligible. A manufacturer said they would consider loading of the truck a transportation cost. Another manufacturer expressed the comment that transportation begins as the vehicle is moving away.

DEP posed the question concerning eligible costs incurred at one-day collection events. A recycler described a typical one-day collection event – a resident pulls up, employees of the recycler unload the vehicle, the electronics are prepared for shipment (placed into gaylords or onto pallets, shrink wrapped), loaded onto trucks and shipped away. The amount of employees necessary depends on the anticipated size of the turnout. Frequently a forklift operator is required to load the truck. Manufacturer representatives indicated they believed the labor costs associated with one – day collection events are collection related, not transportation related and therefore are not eligible for reimbursement. There was discussion and questions about when collection begins and transportation begins. It was noted that CT is different from ME in that there are consolidation facilities in ME and that costs begin at the consolidation points. CT does not have consolidation points in that sense.

There was no consensus on what costs associated with a one-day collection are reimbursable. Manufacturers believed that only transportation costs are covered and that should be defined as the point at which the truck is loaded and ready for transport. Municipalities and at least one recycler indicated that loading a truck should not be considered part of the collection process.

The discussion then turned to transport and tracking. DEP asked where the transportation costs end. Recyclers indicated that they believe the transportation costs end when the truck arrives at their facility (a dismantling facility). Costs for transportation of commodities such as scrap plastic or metals should not be included as reimbursable.

The next costs discussed are related to billing, recording and record-keeping. The billing would be quarterly.

The next cost was a reasonable rate of profit. There was no comment on this.

In addition to the ME list, DEP asked if other costs could be considered reimbursable. A recycler mentioned training for municipal employees in the handling of E-wastes. DEP mentioned that there are already certification requirements for transfer station employees that require training. Private collection sites would need to provide training in accordance with universal waste provisions.

**Next Conference Call - November 14, 2007**  
**1:30 – 3:00 pm**  
**Topic: Standards for Recyclers**