

-----Original Message-----

From: Rita Hypnarowski [<mailto:RHypnaro@dtsc.ca.gov>]
Sent: Tuesday, November 23, 2010 3:11 PM
To: Scott Logan
Subject: Re: Smoke Detectors

Hi Scott,

Smoke detectors that contain electronic circuitry, such as a printed circuit board, are presumed to be hazardous for toxicity, and managed as electronic devices and universal waste-electronic devices subject to California Code of Regulations, title 22, chapter 23 when recycled. The information contained in question and answer 1 of the "Q&A: UWEDs and UWED Dismantling" document dated April 2008 reflects DTSC's current understanding of electronic devices vs. electrical equipment.

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Rita Hypnarowski
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Phone: (916) 255-3699

-----Original Message-----

From: Scott Logan <Scott.Logan@CurieServices.com>
Sent: 11/17/2010 11:24 AM
To: Rita Hypnarowski
Subject: Smoke Detectors

Rita:

Per our phone conversation of November 15, I am writing you to confirm that smoke detectors are California Universal Waste Electronic Devices in accordance with 66273.3 (Applicability - Electronic Devices). In addition to reviewing the regulations, the following DTSC guidance documents were reviewed to make this conclusion: 1) Q&A: UWEDs and UWED Dismantling dated April 2008 and 2) Universal Waste Fact Sheet dated January 2010.

In our conversation, the primary item that seemed to conclusively bring smoke detectors under the UW regulations was the presence of a printed circuit board and other electronic circuitry. Please refer to Question/Answer 1 for document 1 listed above. In addition to free standing smoke detectors, many are capable of transmitting signals electronically to detection panels or centers that monitor and report any signal indicating the presence of an alarm.

As I mentioned Curie operates a recycling facility for ionizing chamber smoke detectors containing Am-241. We have developed a mail back program along with our route based collection service to make recycling of these common consumer commodities possible for the regulated community.

I would appreciate your concurrence in writing. You can forward to me via e-mail at Scott.Logan@CurieServices.com or mail to:

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