



Department of Natural Resources

Five-Year Rule Review Worksheet

Phase 2 - Part C

BASIC INFORMATION

Date Part C Review Concluded: December 1, 2014

Reviewer Name(s): Chad Stobbe, Susan Johnson, Theresa Stiner, Amie Davidson

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Chapter¹ Number: 122

Chapter Name: Cathode Ray Tube Device Recycling

1. DOES THIS CHAPTER² DO THE JOB IT SETS OUT TO DO?

1a. Is this chapter effective at protecting the health, welfare, and safety of Iowans and our natural resources?

Yes

No

(check or circle)

1b. Explain how the chapter protects the health, welfare, and safety of Iowans and our natural resources.

The intent of this administrative chapter was to provide a regulatory program for the recycling of discarded cathode ray tubes (CRTs), and the disassembly and removal of toxic parts from discarded CRTs in a manner that is protective of the human health and the environment. Regulatory oversight of the CRT collection process has allowed the DNR to develop an extensive list of CRT management options across the state, making it easier for consumers to properly manage their discarded electronics.

¹ If the Phase 1 Worksheet addresses a portion of a chapter, rather than a whole chapter, then this follow-up worksheet should address the same portion of the chapter (e.g. rule or rules, paragraph, etc.).

² Throughout this worksheet, the word "chapter" is meant to apply to the chapter or portion of a chapter to which the worksheet applies.

2. IS THERE LEGAL AUTHORITY FOR THIS CHAPTER?

2a. Is the chapter intended to implement any **state statutes**?

Yes No (check or circle)

If this chapter is intended to implement any state statutes, then answer questions 2b and 2c. If not, then proceed to question 2d.

2b. Provide citations for the specific provisions of the Iowa Code implemented by this chapter.

At the conclusion of this administrative chapter there is a chapter implementation sentence that states, "These rules are intended to implement Iowa Code sections 455D.6(7) and 455B.304(1)." The correct Iowa Code citation for this administrative chapter is 455D.6(5), not 455D.6(7).

[Iowa Code section 455B.304](#) - 455B.304(1)

[Iowa Code section 455D.6](#) – 455D.6(5)

2c. Provide a narrative summary of how the state statutes are implemented by this chapter.

Iowa Code section 455D.304(1) states that the commission shall establish rules for the administration of the laws pertaining to solid waste management. While there are specific rules within this administrative chapter that have direct statutory authority, many requirements are based upon the broad authority given under Iowa Code section 455B.304(1) to adopt rules for the proper administration of Division IV "Solid Waste Disposal," Part 1 "Solid Waste." Within the examples given in Iowa Code section 455B.304(1) is the authority to establish rules for "the issuance of permits."

In addition, Iowa Code section 455D.6(5) requires the director to "develop a strategy and recommend to the commission the adoption of rules necessary to implement a strategy for the recycling of electronic goods and the disassembling and removing of toxic parts from electronic goods." This administrative chapter implements this statute by setting certain facility siting, design, operation, record-keeping, training and closure standards for CRT collection and recycling facilities. These standards are implemented through the issuance of permits to CRT recycling facilities and registrations to CRT collection sites.

This administrative chapter is not consistent with the provisions of Iowa Code section 455D.6(5) in that this statute requires a strategy to manage discarded electronic goods. This administrative chapter is for CRTs only, which is a small subset of the broader category of electronic goods. It is also debatable that the intent of "a strategy for the recycling of electronic goods" was meant to result in the creation of a permitting program. While a permitting program succeeds in ensuring that CRTs are recycled in a manner that is protective of human

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health and the environment, it does little to encourage consumers to recycle other discarded electronics as implied by Iowa Code section 455D.6(5).

2d. Does the chapter implement any **federal statutes or regulations**?

Yes No (check or circle)

If this chapter is intended to implement any federal statutes or regulations, then answer questions 2e and 2f. If not, then proceed to question 3.

2e. Provide citations for the specific provisions of federal statutes and regulations implemented by this chapter.

Not Applicable

2f. Provide a summary of how federal statutes and regulations are implemented by this chapter.

Although this administrative chapter does not specifically implement any federal regulation, it does include some hazardous waste management regulations that would be applicable to CRT recyclers (e.g. Universal waste provisions of 40 CFR, Part 273). This was done to ensure that CRT recycling facility operators were aware of those regulations. It should be noted that the state of Iowa has not been delegated authority by the U.S. Environmental Protection Agency (EPA) to implement Resource Conservation and Recovery Act (RCRA) Subtitle C (i.e. federal hazardous waste program), nor is it the DNR's intent to regulate such by the inclusion of some hazardous waste management provisions within this administrative chapter.

3. DOES THE CHAPTER GO BEYOND FEDERAL LEGAL REQUIREMENTS?

3a. Is this chapter more stringent than federal statutory or regulatory requirements?

Yes No Not Applicable (check or circle)

If the answer is "yes," then answer question 3b. If not, then proceed to question 4.

3b. Provide a narrative statement regarding how this chapter is more stringent than required by federal statutes and regulations, and a short justification of why it is more stringent.

When originally adopted, this administrative chapter was intended to reflect certain federal hazardous waste regulations. Since then, the U.S. EPA has adopted a CRT exclusion (a.k.a. CRT rule) in 40 Code of Federal Regulations (CFR), Part 261.4(a)(22). This specifies that used, intact CRTs are not solid wastes (and therefore not a hazardous waste) unless they are disposed of or speculatively accumulated as defined in 40 CFR, Part 261.1(c)(8). This CRT exclusion also conditionally excludes used, broken CRTs (housing removed, vacuum broken) if they're stored in accordance with 40 CFR, Part 261.39, which includes certain storage, labeling, transportation and speculative accumulation and use constituting disposal provisions.

Because of the federal CRT exclusion, this administrative chapter can be considered more

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stringent than federal regulatory requirements. However, if CRTs are not managed in accordance with the federal CRT exclusion (e.g. speculative accumulation), federal hazardous waste regulations would then be applicable.

The following are specific examples within this administrative chapter where state provisions are more stringent than federal regulatory requirements:

CRT collection facilities:

- 567 IAC 122.6(1) – Storage is limited to 2,000 CRTs or 48 Gaylord boxes, while federal regulations cite speculative accumulation under the CRT exclusion as the threshold for further regulatory requirements.
- 567 IAC 122.6(2) – Sets a storage timeframe of no longer than one year, while federal regulations cite speculative accumulation under the CRT exclusion as the threshold for further regulatory requirements.
- 567 IAC 122.6(8) – Requires such facilities to maintain records on-site, while federal regulations do not mandate on-site record-keeping.
- 567 IAC 122.6(9) – Places certain handling, safety and emergency procedures training upon such facilities, while federal regulations do not require employee training, unless required under certain worker safety provisions administered by the U.S. Occupational Safety and Health Administration (OSHA).
- 567 IAC 122.7 – Requires CRT collection facilities maintain records regarding CRT shipments for three years, while no comparable federal requirement exists.

CRT recycling facilities:

- 567 IAC 122.8(1) – Requires entities wanting to engage in the recycling of CRTs to submit a permit application to the DNR, where no comparable federal requirements exist under the federal CRT exclusion.
- 567 IAC 122.9 – Places a siting restriction upon CRT recycling from being located within the 100-year flood plain, where no comparable federal requirement exists for siting.
- 567 IAC 122.10 – Places certain design requirements upon CRT recycling facilities, where no comparable federal requirements exist under the federal CRT exclusion. Federal regulations require a building or container that is designed to minimize releases.
- 567 IAC 122.11 – Places certain collection requirements on CRT recycling facilities, where no comparable federal requirements exist under the federal CRT exclusion.
- 567 IAC 122.16 – Places requirements upon CRT recycling facilities regarding the removal and proper disposal of polychlorinated biphenyl (PCB) capacitors. Under 40 CFR, Part 761.60(ii), small capacitors can be disposed of in a sanitary landfill.
- 567 IAC 122.20 – Requires CRT recycling facilities develop and maintain on-site an emergency response and remedial action plan (ERRAP), where no comparable federal requirements exist under the federal CRT exclusion.
- 567 IAC 122.21 – Places general training requirements upon CRT recycling facilities, where no comparable federal requirements exist under the federal CRT exclusion.

- 567 IAC 122.22 – Places reporting requirements upon CRT recycling facilities regarding the number or weight of devices received annually, where no comparable federal requirements exist under the federal CRT exclusion.
- 567 IAC 122.23 – Places certain record-keeping requirements upon CRT recycling facilities, where no comparable federal requirements exist under the federal CRT exclusion.
- 567 IAC 122.24 – Places site closure requirements upon CRT recycling facilities, where no comparable federal requirements exist under the federal CRT exclusion.
- 567 IAC 122.25 – Places financial assurance requirements upon CRT recycling facilities to ensure adequate funds are available to properly dispose of discarded CRTs and materials derived from discarded CRTs that may remain at a site. CRT recycling facilities must obtain financial assurance in the amount of one dollar per pound of CRTs that are speculatively accumulated. However, once they reach the level of speculative accumulation, these entities no longer meet the federal CRT exclusion, greatly increasing the cost to manage discarded CRTs. Federal regulations do not require financial assurance, as they rely upon the provisions of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund for abandoned facilities.

4. DOES THIS CHAPTER HAVE UNINTENDED CONSEQUENCES?

4a. Does the chapter result in the equitable treatment of those required to comply with it?

Yes No (check or circle)

4b. Provide a narrative summary of your response.

For any public or private entity deemed to require a recycling permit for their CRT management activities, the provisions are applied equally to all. However, CRT collection facilities are required to register with the DNR with a limitation on the number of CRTs allowed for storage at any one time, while facilities that engage in CRT service or repair activities are exempt from the regulatory requirements of this administrative chapter.

4c. Does the chapter result in the inequitable treatment of anyone affected by the chapter but not required to comply with it?

Yes No (check or circle)

4d. Provide a narrative summary of your response.

Because of the adoption of the federal CRT exclusion in 40 CFR, Part 261.39, those entities not required to comply with 567 IAC 122 are not being inequitably treated or negatively affected by the requirements of this administrative chapter.

4e. Are there known negative unintended consequences of this chapter?

Yes No (check or circle)

If the answer is "yes," then answer question 4f. If not, then proceed to question 5.

4f. Specifically state the nature of any negative unintended consequences.

Permitted CRT recycling facilities are exempt from financial assurance requirements until they've speculatively accumulated discarded CRTs and materials derived from discarded CRTs. However, it's been the DNR's experience that by the time they've reached the point of speculative accumulation, the recycling operation is already in financial trouble. Additionally, once CRTs have been speculatively accumulated, they're no longer covered under the federal CRT exclusion and are therefore considered hazardous waste, which will significantly increase costs associated with proper management and regulatory oversight.

Additionally, CRT recycling facilities do not "facilitate the final disposition of solid waste," and therefore should not be classified as an SDP. As such, justification for certain permitting provisions (e.g. financial assurance, emergency response and remedial action plans) should not be made by referencing SDP permitting provisions in Iowa Code .

While the DNR has not been delegated authority by the U.S. EPA to implement RCRA, Subtitle C, there are provisions within this administrative chapter that mirror federal requirements. This was done to assist CRT recycling facility operators in complying with applicable federal regulations. The inclusion of or reference to certain federal requirements within this administrative chapter could give the impression to permit holders that compliance with this administrative chapter ensures compliance with (or that the DNR is implementing) applicable federal hazardous waste regulations.

5. CAN THE GOALS OF THE CHAPTER BE ACHIEVED IN A MORE EFFICIENT OR STREAMLINED MANNER?

5a. Is the chapter broader than necessary to accomplish its purpose or objective?

Yes No (check or circle)

5b. Provide a narrative summary of your response.

This administrative chapter's scope is narrow in that it only addresses the collection and recycling of CRTs, rather than a broader segment of electronic goods, as was implied by the enabling statute.

5c. Is the purpose of this chapter achieved in the least restrictive manner?

Yes No (check or circle)

5d. Provide a narrative summary of your response.

Enabling statutory authority requires the DNR implement a strategy for recycling of electronic

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goods and the disassembling and removing of toxic parts from electronic goods. This broad authority provides the DNR with the latitude to promulgate regulations ranging from individual facility permits to education and technical outreach. The current regulatory approach is to register CRT collection facilities and issue individual facility permits to CRT recycling facilities.

Given activities conducted at CRT recycling facilities are similar from one facility to the next, a “general permit” or permit-by-rule approach may reduce regulatory requirements without lessening environmental protection standards. Further discussion is needed regarding the possible revision or rescission of this administrative chapter to achieve the desired result through a means other than formal, individual permitting. For example, additional emphasis and resources dedicated to expanding education and technical assistance efforts (in collaboration with the U.S. EPA) to entities that manage discarded CRTs. The notion of achieving the intent of this administrative chapter through extended producer responsibility should be considered; with the intent of encouraging the business community to collect and properly dispose of CRTs.

5e. What, if any, reasonable and practical alternatives to this chapter are available by the agency?

As stated above, a more streamlined regulatory approach (e.g. general permits, permit-by-rule) could be applied to the permitting of CRT recycling facilities. Also, given the U.S. EPA regulates certain components and contaminants contained in electronic goods (e.g. PCB- and mercury-containing components), perhaps the need for a state-specific permitting program is not warranted. Instead, the DNR’s role could focus on expanded education and outreach, and promoting take back programs to accomplish the required strategy in Iowa Code. If the primary benefit of the registration process for CRT collectors is that the DNR has a list of collection sites for the public, this could perhaps be incorporated into the DNR's voluntary Iowa Green List directory and subsequently removed from administrative rule. Regardless of the regulatory approach undertaken, further dialogue with the CRT recycling industry is needed to address the issue of abandoned CRT stockpiles, and the appropriate level of state oversight.

5f. How do the economic and social costs of various alternatives to this chapter, if known, appear to compare to the known economic costs of this chapter?

Implementing a “general permit” or permit-by-rule regulatory program could decrease costs to both the DNR and the regulated community by streamlining the regulatory process. Shifting the DNR’s focus from permitting to education and outreach could also reduce costs to those collecting and recycling discarded CRTs; however, the cost to the DNR would be dependent upon the scope of those education and outreach efforts and whether this approach is effective.

5g. Do the known economic costs of the chapter outweigh the known economic and social benefits?

The cost for entities to complete the site-specific permit application process and the cost to obtain financial assurance could be considered excessive; however, most facilities will never speculatively accumulate and therefore may not warrant financial assurance coverage.

6. DOES THE CHAPTER AFFECT BUSINESS OR INDUSTRY?

6a. Does the chapter affect businesses operating in Iowa?

Yes No (check or circle)

If the answer is "yes," then answer questions 6b through 6i as applicable. If not, then proceed to question 6f.

6b. What kinds of businesses are affected by this chapter?

Electronics recyclers, businesses and local government agencies that accept discarded CRTs for recycling. There are many individuals who seek to recover scrap copper from CRTs on an occasional basis, that are either unaware of the regulations or find them too burdensome to comply.

6c. Does this chapter create a burden for businesses?

Yes No (check or circle)

6d. Explain your response to question 6c.

A case could be made that requiring CRT recyclers obtain a permit is burdensome to business given the federal CRT exclusion in 40 CFR, Part 261.4(a)(22), and Iowa Code does not specifically require a permitting program; but rather a strategy. Additionally, the federal CRT exclusion became effective after this administrative chapter was adopted. As a result, this administrative chapter includes provisions that are not expressed within the subsequent federal CRT exclusion, which complicates the management of this waste stream for businesses.

If the answer to question 6c is "yes," then answer question 6e. If not, then proceed to questions 6f through 6i.

6e. If this rule does create a burden for businesses, what options are available to address those burdens?

While a federal CRT exclusion has been adopted, Iowa Code requires the DNR develop a strategy for the recycling of electronic goods and the disassembling and removal of toxic parts from electronic goods. Given the U.S. EPA regulates certain components and contaminants contained in electronic goods (e.g. PCB- and mercury-containing components), perhaps the need for a state-specific permitting program is no longer warranted. Instead, the DNR's role could focus on expanded education and outreach, and promoting take back programs to accomplish the required strategy. Regardless of the regulatory approach undertaken, further dialogue with the CRT recycling industry is needed to address the issue of abandoned CRT stockpiles and the appropriate level of state oversight.

6f. Do industry standards affect the subject matter of this chapter?

Yes No (check or circle)

If the answer is "yes," answer questions 6g through 6i as applicable. If not, proceed to question

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6g. Have industry standards changed since the adoption of this chapter?

Yes No (check or circle)

If the answer is "yes," answer questions 6h and 6i. If not, proceed to question 7.

6h. What industry standards have changed since the adoption of this chapter?

The CRT recycling industry is changing in that very few CRTs are being produced; however, many are still in use. Because no new CRTs are being produced, there is little market for the leaded glass, and there is a cost incurred to properly recycle or dispose of the leaded glass. As a result, a number of states have found stockpiles of CRTs that have been abandoned by CRT recyclers and collectors. Although at some point the number of CRTs being discarded will reach a negligible amount, until that time, there is a significant potential for abandoned stockpiles. The collection of CRTs has also changed in that retailers are increasingly accepting discarded electronics for proper recycling, including discarded CRTs.

Another significant change has been the adoption of the federal CRT exclusion. As explained above, the federal CRT exclusion clarifies that intact CRTs, broken CRTs and processed CRT glass are not a solid waste (or hazardous waste) unless they are discarded or speculatively accumulated.

6i. Would revision of the chapter be useful in implementing the purposes of the chapter in light of any industry standard revisions? (Cite the portions of the chapter that could be revised.)

Yes, revisions throughout this administrative chapter could be made in light of changing industry standards. Given the federal CRT exclusion, it's not just a revision to certain portions of the administrative chapter, but rather a re-evaluation of how the DNR is to meet the statutory mandate of developing a strategy for discarded electronics. As discussed prior, utilization of a broader permit-by-rule approach to regulatory oversight or a refocus of DNR efforts toward expanded education and technical assistance are all options for further discussion with stakeholders.

7. DOES THIS CHAPTER AFFECT JOB CREATION?

7a. Does the chapter affect job creation?

Yes No (check or circle)

If the answer is "yes," then answer questions 7b and 7c. If not, then proceed to question 8.

7b. If this chapter affects job creation, in what manner does that occur?

Not Applicable

7c. If this chapter is required by state or federal statutes, or federal regulations, how has the

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department minimized negative job impacts?

Not Applicable

**8. IS THERE ANY DOCUMENTATION OR PAPERWORK
REQUIRED BY THIS CHAPTER?**

8a. Is there any documentation or paperwork required by this chapter?

Yes No (check or circle)

If documentation or paperwork is required, then answer questions 8b through 8e. If not, then proceed to question 9.

8b. What is the purpose of the documentation or paperwork?

The registration for CRT collection facilities provides the DNR and the general public with who is collecting discarded CRTs. The permit application for CRT recyclers is needed to determine if the facility is meeting the design and operating requirements of the administrative chapter. The annual reporting requirements for CRT recyclers are to ensure that they're in fact recycling the CRTs, rather than allowing them to accumulate and potentially result in a future abandoned stockpile issue.

8c. Who reviews the paperwork required by the chapter?

DNR central office and field office staff review registrations, permit applications and annual reports to ensure compliance with regulations and to ensure such activities are protective of human health and the environment.

8d. How is the documentation or paperwork required by this chapter informative or useful for the public?

Because all paperwork is made public, it provides transparency and a level playing field for all required to comply with this administrative chapter. CRT recyclers have at times contacted the DNR to point out potential violations at other facilities based on information contained in the submitted paperwork. This information is also useful for solid waste planning areas, local governments and the general public to use as a measure of the effectiveness of recycling programs implemented in their area. The CRT permitting and registration paperwork also provides information that assists the general public in identifying local resources for the proper management of discarded CRTs.

8e. How, if possible, can the documentation or paperwork requirements be reduced?

Revisiting how the DNR meets the statutory mandate of developing a strategy for discarded electronics could result in a reduction in paperwork. Utilization of a broader permit-by-rule approach to regulatory oversight or a refocus of DNR efforts toward expanded education and technical assistance are all options for further discussion with stakeholders.

**9. DO OTHER STATE AGENCIES REGULATE
THE ISSUES ADDRESSED BY THIS CHAPTER?**

9a. Do any other state agencies regulate any issue(s) addressed by this chapter?

Yes No (check or circle)

If the answer is "yes," then answer questions 9b to 9e. If not, then proceed to question 10.

9b. If other state agencies regulate any issue(s) addressed by this chapter, provide the name of each agency, a description of how each agency is involved, and specify the subject matter regulated by each agency.)

Not Applicable

9c. Is there a need for more than one set of rules?

Yes No (check or circle)

If the answer is "yes," then proceed to question 9d. If not, then proceed to question 9e.

9d. If any other state agencies regulate any issue(s) addressed by this chapter and one or more of the other sets of rules are necessary, explain why.

Not Applicable

9e. If this chapter or a portion thereof is duplicative, explain how and why.

Not Applicable

10. IS THE CHAPTER USER FRIENDLY?

10a. Is the chapter written and organized in a clear and concise manner so that those to whom it applies can readily understand it?

Yes No (check or circle)

If the answer is "no," then answer question 10b. If not, then proceed to question 11.

10b. If not, explain what changes can be made to improve readability, eliminate ambiguity, or increase understanding. Be specific, to the extent possible.

There are several opportunities to consider in addressing the ambiguity within this administrative chapter. They include:

- It appears that 567 IAC 122.2(1) and 122.2(2) conflict, as one states that the rule applies to CRT refurbishing, but the latter indicates that the administrative chapter does not apply to "businesses solely engaged in CRT service and repair." Also, it's unclear how

this administrative chapter would apply to an entity that is not solely engaged in CRT service and repair, but undertakes some level of repair.

- 567 IAC 122.4(3) states that CRT recycling facilities must be constructed and operated according to plans and specifications approved by the DNR, however nothing in this administrative chapter pertains to specific construction design plans or the DNR's role in reviewing and approving them. "Constructed" and "plans and specifications" implies the DNR is to regulate how the facility is designed, which the DNR may not have the authority to do.
- The transfer of title requirements in 567 IAC 122.4(4) are different than in 567 IAC 102, as well as in other solid waste administrative chapters (e.g. 567 IAC 113). These provisions should be identical across all solid waste permitting chapters and should perhaps be located in a universal permitting chapter moving forward.
- Upon further review, many of this administrative chapter's permitting requirements are similar to those in other solid waste chapters, and therefore could possibly be consolidated to ensure consistency and ease of use for the regulated public.
- The continued reference to Iowa Code chapter 455B throughout this administrative chapter implies these permits are SDPs, even though they do not meet the statutory definition of an SDP (i.e. facilitate the final disposition of solid waste).

11. ARE THE CITATIONS IN THE CHAPTER ACCURATE?

11a. If this chapter contains Iowa Code citations, are those citations proper and current?

Yes No Not Applicable (check or circle one option)

If the answer is "no," then answer question 11b. If not, then proceed to question 11c.

11b. If not, list and explain the corrections that need to be made to the Iowa Code citations.

567 IAC 122.1 references that this administrative chapter is intended to satisfy the requirements of Iowa Code sections 455D.6(7) and 455B.304(1). The correct citation in Iowa Code chapter 455D is 455D.6(5). This incorrect Iowa Code reference is also reiterated within the implementation sentence at the end of this administrative chapter.

11c. If this chapter contains federal statutory citations, are those citations proper and current?

Yes No Not Applicable (check or circle one option)

If the answer is "no," then answer question 11d. If not, then proceed to question 11e.

11d. If not, list and explain the corrections that need to be made to the federal statutory citations.

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Not Applicable

11e. If this chapter contains federal regulatory citations, are those citations proper and current?

Yes No Not Applicable **(check or circle one option)**

If the answer is "no," then answer question 11f. If not, then proceed to question 11g.

11f. If not, list and explain the corrections that need to be made to the federal regulatory citations.

Not Applicable

11g. If this chapter contains internal cross-reference citations, are those citations correct and current?

Yes No Not Applicable **(check or circle one option)**

If the answer is "no," then answer question 11h. If not, then proceed to question 11i.

11h. If not, list and explain the corrections that need to be made to the internal cross-references.

In 567 IAC 122.24, the reference to 567 IAC 122.11(1)"n" should be 122.8(1)"n".

11i. If the chapter contains cross-reference citations to other chapters, are those citations correct and current?

Yes No Not Applicable **(check or circle one option)**

If the answer is "no," then answer question 11j. If not, then proceed to question 11k.

11j. If not, list and explain the corrections that need to be made to the cross-references to other chapters or outside sources.

567 IAC 122.18 refers to "Test Methods for Evaluation of Solid Waste, Physical-Chemical Methods SW846, U.S. EPA, Third Edition 1986. The most recent version is Revision 6, February 2007.

11k. If this chapter contains website references, are those website references necessary, correct and current?

Yes No Not Applicable **(check or circle one option)**

If the answer is "no," then answer question 11l. If not, then proceed to question 11m.

11l. List and explain any necessary corrections to the website references.

Not Applicable

11m. If the chapter contains addresses and phone numbers, are the addresses and phone numbers necessary, correct and current?

Yes No Not Applicable **(check or circle one option)**

If the answer is "no," then answer question 11n. If not, then proceed to question 11o.

11n. List and explain any corrections that need to be made to the addresses and phone numbers contained in the chapter.

Not Applicable

11o. If the chapter contains adoptions by reference, are those adoptions by reference correct and current?

Yes No Not Applicable **(check or circle one option)**

If the answer is "no," then answer question 11p. If not, then proceed to question 11q.

11p. List and explain any corrections that need to be made to update adoptions by reference.

567 IAC 122.22(5)"f"(5) refers to Government Accounting Standards Board (GASB) Statement 18. GASB 18 pertains only to accounting standards for municipal solid waste landfill closure and postclosure care costs; not any activity this administrative chapter regulates.

11q. If the chapter contains DNR-created documents adopted by references, are those document references necessary, correct and current?

Yes No Not Applicable **(check or circle one option)**

If the answer is "no," then answer question 11r. If not, then proceed to question 12.

11r. List and explain any corrections that need to be made to update the DNR-created document references.

In 567 IAC 122.4(9), the reference to Form 50 (542-1542) should be Form 50R (542-1607).

12. WHAT PUBLIC GROUPS ARE AFFECTED BY THE CHAPTER?

12a. List any stakeholder groups, workgroups, public groups or other public participants impacted by the issues in the chapter.

Potential interested parties: Current CRT collectors and recyclers, electronics retailers, consumers, U.S. EPA, Iowa Society of Solid Waste Operations (ISOSWO), Iowa Recycling Association (IRA), Iowa Environmental Council (IEC), Sierra Club - Iowa Chapter, Association of Business and Industry (ABI), League of Cities, Iowa State Association of Counties (ISAC), County Environmental Health Sanitarians.

12b. If any stakeholders have already been included in a review process for this chapter during the past five years, state the names of those stakeholder groups, workgroups, public groups, or other public participants, and explain the nature of their involvement.

External stakeholder feedback has not been sought in the past five years regarding revisions to this administrative chapter.

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