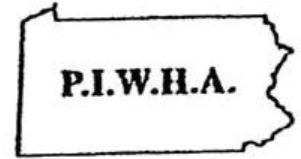


# Pennsylvania Independent Waste Haulers Association, Inc.



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February 29, 2016

*Sent via email only to [mnerozzi@jcc.legis.state.pa.us](mailto:mnerozzi@jcc.legis.state.pa.us)*

Tony M. Guerrieri  
Executive Director  
Joint Legislative Air and Water Pollution  
Control and Conservation Committee  
PO Box 202264  
Harrisburg, PA 17120-2264

Re: Public Hearing ó The Covered Device Recycling Act

Dear Mr. Guerrieri:

I am writing this correspondence to you on behalf of the Pennsylvania Independent Waste Haulers Association (PIWHA). PIWHA is an incorporated trade association comprised of well over 100 non-public, private waste haulers and other companies operating in the solid waste industry throughout the Commonwealth of Pennsylvania.

The PIWHA membership is active in monitoring legislation that affects the solid waste industry. Like many other trade associations, businesses, municipalities, citizen groups, etc. operating throughout the Commonwealth, PIWHA is very concerned about developments surrounding the collection and disposal of covered devices as defined in the Pennsylvania Covered Device Recycling Act (the Act).

On behalf of the members of PIWHA, I would like to thank you for the opportunity to set forth our position with regard to the restrictions set forth in the Act. On numerous occasions, PIWHA has worked directly with officials in a cooperative manner to assist municipalities in dealing with the many challenges they face related to the required management of its waste and recycling collection.

In our collective experience, it has become readily apparent that Pennsylvania counties and local municipalities are truly struggling, despite their best efforts, to properly manage the collection and disposal of covered devices in anything resembling an efficient manner. PIWHA believes very strongly that collection and disposal of covered devices should be performed by waste haulers or other businesses properly licensed to do so by the Commonwealth of Pennsylvania.

Tony M. Guerrieri, Executive Director  
February 29, 2016  
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Provided they maintain a license to collect and dispose of covered devices, these haulers or other businesses should be permitted to charge a reasonable fee for the performance of this service. Similar to the collection and disposal of white goods with Freon, waste haulers should be permitted to perform these services curbside and at business locations, without penalties, as long as the services are performed in compliance with Pennsylvania Department of Environmental Protection regulations.

PIWHA will continue to fully support all municipal collection efforts through electronics recycling drop off days and other similar events for residents.

Further, given the developing severity of the issues surrounding the Act, PIWHA would also support a temporary reprieve of the disposal bans that came into effect under the Act until a permanent solution is developed. This temporary reprieve would allow sufficient time to clean up and otherwise address the significant illegal dumping of covered devices which is occurring throughout the Commonwealth.

We ask that our position, as set forth above, become part of the hearing record. I would like to thank you for your consideration of our position. Please feel free to contact me if you have any questions with regard to same.

Respectfully,

*Gary T. Roberts*

Gary T. Roberts, Executive Director  
Pennsylvania Independent Waste Haulers Association

cc: PIWHA Board of Directors