



The Honorable Heather Hadwick
Member, California State Assembly
1021 O Street, Suite 5710
Sacramento, CA 95814

RE: Assembly Bill 2667 – SUPPORT

Dear Assembly Member Hadwick,

On behalf of the Rural County Representatives of California, [REDACTED], and [REDACTED] we are pleased to support your Assembly Bill 2667 regarding vapes.

Assembly Bill 2667 seeks to protect children, young adults, and the public by: 1) Banning disguised vapes and vapes containing video display devices, 2) Providing an easier regulatory pathway for schools to properly dispose of vapes confiscated from students, and 3) Improving the safe collection, management, and proper disposal of vapes by local household hazardous waste (HHW) collection facilities.

Vapes are ubiquitous, commonly encountered in the waste stream, and must be managed as hazardous waste because they contain residual chemicals, batteries, and electronic components. Vapes create real public health and safety risks when disguised or improperly disposed. Local government household hazardous waste (HHW) collection programs are intended to provide safe and convenient ways for residents and small generators to dispose of hazardous wastes like vapes.

Disguised Vapes and Video Game Vapes

Vapes are increasingly designed and marketed to appeal to minors and young adults - often in ways that are deceptive or intended to increase the level of addiction. Some vapes now contain integrated video games that are intended to increase the user's interaction with the device. Other vapes are manufactured to be nearly indistinguishable from common school supplies like highlighters and markers or household items like key fobs, watches, and even hoodies.

Disguised vapes are harder for educators to detect and also pose heightened fire risks for collection trucks and solid waste facilities. This is because vapes contain batteries that can explode violently and quickly cause massive amounts of damage. By being nearly indistinguishable from ordinary consumer goods, disguised vapes are much more likely to avoid detection and make their way into recycling facilities and landfills, which significantly increases the risk of compaction and fire.

By banning the sale of disguised vapes and video game vapes, AB 2667 will help protect children, promote school safety, and reduce the risk of vape-caused fires.

Vapes Confiscated by Schools

Schools often confiscate vapes that students bring from home, with some teachers reporting drawers full of devices that they don't know how to dispose. While the student or parent can dispose of the vape as HHW at a HHW collection facility, schools are not considered "households" and often generate too much hazardous waste to be able to use local HHW collection facilities. As a hazardous waste, there are few transporters and disposal opportunities available, which means it can be very expensive to properly manage and dispose of the contraband.

To address this problem, AB 2667 directs the Department of Toxic Substances Control to evaluate opportunities to increase the safety and convenience for managing vapes confiscated from students by a school. Schools and local governments need clear, implementable, and cost-effective solutions from the state for how to manage this growing waste stream.

HHW Collection Facility Management of Vapes

Vapes include batteries, circuitry, and fluid cannisters, all of which have different hazardous traits. As such, they can be extremely expensive for local HHW programs to manage, with costs often reaching \$350 for a 5-gallon bucket. While the batteries and circuitry have value and are recyclable, the fluid canister is oftentimes considered acutely hazardous waste. Vapes could be managed much more cost effectively if HHW collection facilities were authorized to safely disassemble them, as the cartridge (which is often the most expensive to manage) could be separated from the batteries and circuitry and each component could be managed separately. This approach would allow far greater system efficiencies and significantly drive down program costs.

AB 2667 allows HHW collection facilities to safely disassemble vapes after consultation with local environmental health and fire agencies, provided the personnel receive proper training and the activities do not result in the unauthorized release of hazardous materials. AB 2667 merely authorizes HHW collection facilities to disassemble vapes if they believe it will reduce program costs. As such, AB 2667 could reduce local government HHW management costs and open the door for more convenient vape disposal opportunities.

For these reasons, we are pleased to support AB 2667.

Sincerely,

cc: The Honorable Damon Connolly, Chair, Assembly Committee on Environmental Safety and Toxic Materials
The Honorable Marc Berman, Chair, Assembly Committee on Business and Professions

Members of the Assembly Committee on Environmental Safety and Toxic
Materials

Members of the Assembly Committee on Business and Professions

The Honorable Juan Alanis, California State Assembly

Josh Tooker, Chief Consultant, Assembly Committee on Environmental Safety and
Toxic Materials

Robert Sumner, Chief Consultant, Assembly Business and Professions Committee

Gino Folchi, Consultant, Assembly Republican Caucus Office of Policy and Budget

Bill Lewis, Consultant, Assembly Republican Caucus Office of Policy and Budget