From: Tom Baker
To: Tripp, Anthony;
cc: Kevin D McGrath;
Subject: RE: Regulatory status of electronic cigarettes
Date: Friday, March 22, 2013 3:21:56 PM

Anthony, below is a response to the 4 questions you had requested additional clarification concerning the electronic cigarettes.

1. What parts of an electronic cigarette can, and what parts cannot be recycled?

The electronic cigarette generally has a stainless steel shell, circuit board and primary lithium battery, which can be recycled. The components destined for incineration includes a small cartridge containing a nicotine and propylene glycol mixture.

2. What amounts have you received to date, and what amounts do you anticipate handling in the future?

We have not received any units to date. Initial market information indicates 500,000 units per year could be recycled. However, the number was a premarket bench mark and will be significantly impacted by the sale of product and voluntary recycling by the consumer.

3. What regulatory interpretations have you received from other states or the federal EPA regarding this issue?

We do not have any regulatory interpretations regarding these units. FLDEP is the first agency from whom we have requested guidance regarding the classification of the electronic cigarettes.

4. How are electronic cigarettes currently processed?

We anticipate most post-consumer cigarettes are disposed of through the household solid waste or municipal waste stream. We believe the pre-consumer (unused) off-specification cigarettes are being managed typically through hazardous waste incineration.

In addition to obtaining a waste determination for the electronic cigarettes when they are discarded, we are also interested in determining whether a recycling alternative could be provided to the consumer instead of the current disposal method of landfilling or incineration.

Thank you again for your assistance with this matter.

Tom Baker
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From: Tripp, Anthony [mailto:Anthony.Tripp@dep.state.fl.us]
Sent: Wednesday, February 27, 2013 4:18 PM
To: Tripp, Anthony; Tom Baker
Cc: Kevin D McGrath
Subject: RE: Regulatory status of electronic cigarettes

Mr. Baker,

Are you still interested in working with the State of Florida Department of Environmental Protection to facilitate a response to the October 21, 2012 letter (attached for reference)?

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.

From: Tripp, Anthony
Sent: Friday, December 07, 2012 8:47 AM
To: 'tom.baker@veoliaes.com'
Cc: 'kevin.mcgrath@veoliaes.com'
Subject: Regulatory status of electronic cigarettes

Mr. Baker,

We have received your letter of October 21, 2012 regarding the regulatory status of electronic cigarettes. Your request is currently under review. This is the first request we have received regarding electronic cigarettes and as such will require some research on our part prior to addressing this issue. Along that line, it would be helpful for us if you could provide some background information regarding the handling of off-specification or unused discarded electronic cigarette products.

1. What parts of an electronic cigarette can, and what parts cannot be recycled?
2. What amounts have you received to date, and what amounts do you anticipate handling in the future?
3. What regulatory interpretations have you received from other states or the federal EPA regarding this issue?
4. How are electronic cigarettes currently processed?

We appreciate your patience in this matter and look forward to any information you can provide that will aid in our effort to develop a response to your request.

Sincerely,

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766