

**Solar Panel Regulations Public Workshop Questions for Participants**  
**July 28, 2010**  
**Discussed as Part of the Public Workshop**

DTSC asks that stakeholders and workshop participants provide input on the following questions as they relate to the draft conceptual regulations. Please provide examples where necessary.

1. Should treatment of solar panels be allowed? For example, should some level of simple disassembly of the solar panels (e.g., removal of metal frames, wires) be allowed? Will that facilitate reclamation? Who should conduct such treatment?
2. Do we integrate the proposed chapter 23, article 8 standards into existing chapter 23 standards?
3. Under the proposed exemption in 66261.6, will transport directly to a reclamation facility allow for current solar panel recycling activities that are already in-place by some solar panel manufacturers? Will this allow for 3<sup>rd</sup> party entities to receive solar panels with ultimate disposition to a reclamation facility?
4. Are solar panel transporter requirements enough? Is reference to chapter 23 universal waste transporter requirements enough? Should there be specific shipping paper requirements and tracking of shipment?
5. Proposed inclusion of solar panels into universal waste management scheme does not include existing household or conditionally exempt small quantity universal waste generator universal waste exemptions. Is this necessary to ensure that only universal waste solar panel handlers manage solar panels (e.g., trained solar panel installers)? Does this support current solar panel manufacturer take-back models and provide a more pro-active approach to mitigate the impact on local solid waste collection facilities/resources?
6. Is there a need for annual reports? If so, what kind of information should be provided to DTSC, and who should provide this information?
7. Are the regulations clear on the definition of a solar panel? Are visual standards enough? How broken is broken? Is a definition for solar cell needed as well?
8. Does DTSC need information (i.e., notification) to identify "solar panel vendors"? If so, what kind of information is needed, and how frequently would that initial information be updated (e.g., annually, owner name/address changes, etc.)?

**Input and comments on these questions are due on**  
**August 11, 2010, to [ehaertle@dtsc.ca.gov](mailto:ehaertle@dtsc.ca.gov).**