

Mercury-Added Product Manufacturers Alternative Labeling Request



A. Company Information

Company Name

Street Address

City

State/Province

Country

Zip Code

Contact Person

Email Address

Telephone #

Fax #

B. Alternative Labeling Information

Type of Product

Product Identifier **

Product Application

** Please list by model number, series, family, etc. Indicate specific product or category of products with similar characteristics.

A manufacturer may apply to the Agency for an alternative to the requirements of the law where:

- Strict compliance with the requirements is not feasible as determined by the Agency.
- The proposed alternative would be at least as effective in providing presale notification of mercury content.
- The proposed alternative would be at least as effective in providing instructions on proper disposal.
- Federal law governs labeling in a manner that preempts state authority.

Note: Alternative labeling requests can be submitted for "product category" only when the characteristics of the product which prohibit compliance with the labeling law are pertinent to each product within the category.

Why are you unable to meet the requirement(s) of the law?

Document the justification for the requested alternative.

(Please be specific)

Describe how the alternative ensures that purchasers or recipients of mercury-added products are made aware of mercury content prior to purchase or receipt.

(Please be specific)

Describe how a person discarding the mercury-added product will be made aware of the need for proper handling to ensure that it does not become part of the solid waste or wastewater.

(Please be specific)

Document the readiness of all necessary parties to implement the proposed alternative.

(Please be specific)

Describe the performance measures to be utilized by the manufacturer to demonstrate that the alternative is providing effective presale notification and predisposal notification.

(Please be specific)

What is your "Alternative" labeling proposal?

Please identify all labeling proposed for each product or category (e.g. product, package, internet, literature). Include detail (e.g. size, material, location, attachment method, wording and font size) for each label.

Mail to:

VTDEC – EAD

Attn: Karen Knaebel
103 South Main Street, Cannery
Waterbury, VT 05671-4911

Please save a copy of this form for your records. If you have any questions, please call Karen Knaebel (802) 241-3455 or by email at Karen.Knaebel@state.vt.us

For Agency Use Only:

Approval Number

Date

Approved by