



Georgia-Pacific LLC
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May 10, 2018

Electronic Delivery

US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Mailcode: 5304P
Attention Docket ID No. EPA-HQ-RCRA-2012-0121

Re: Docket ID No. EPA-HQ-OLEM-2017-0463: Proposed Rule – Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations (83 *Federal Register* 11654, March 16, 2018)

Dear Sir/Madam:

Enclosed are the comments of Georgia-Pacific LLC ("GP") on the U.S. Environmental Protection Agency's (EPA) proposed rule entitled "Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations" published in the *Federal Register* at 83 *Fed. Reg.* 11654 (March 16, 2018). GP appreciates the opportunity to comment on this important rulemaking.

GP is one of the world's leading manufacturers and marketers of building products, tissue, packaging, paper, cellulose, and related chemicals, with about 150 manufacturing facilities in the United States that will be affected by this rule. GP urges EPA to consider and incorporate the enclosed comments in the final rulemaking.

If you have any questions or need additional information about these comments, please contact Mike Curtis (404-652-4133) or me.

Sincerely,

A handwritten signature in blue ink that reads "Traylor Champion".

Traylor Champion
Vice President, Environmental Affairs

**COMMENTS FROM GEORGIA PACIFIC LLC ON EPA's
PROPOSED RULE:
"Increasing Recycling: Adding Aerosol Cans to the Universal Waste
Regulations"**

83 Fed. Reg. 11654 (March 16, 2018)

I. Introduction

Georgia-Pacific LLC (GP) appreciates this opportunity to comment on the proposed "Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations" rule, published in the *Federal Register* on March 16, 2018. GP is one of the largest forest product companies in the United States, and manufactures the following:

pulp	medium density fiberboard	paperboard	engineered lumber
paper	tissues and towels	gypsum	hardboard
lumber	oriented strandboard	softboard	treated lumber
plywood	Dixie® plates and cups	packaging	chemical products

GP has approximately 150 manufacturing facilities with operations throughout the country. Every facility generates aerosol cans and will be affected by this rule. Accordingly, GP has a strong interest in the outcome of this rulemaking.

GP has also participated actively in the development of comments by the American Forest & Paper Association (AF&PA). We strongly endorse their comments. Rather than repeat all the points contained in those comments, we will briefly address issues of interest to our manufacturing facilities.

II. Characterization

The Background section of the preamble includes "...aerosol can to demonstrate the hazardous characteristic for ignitability (40 CFR 261.21)".

Faxback/RCRA Online Number 13027 states that "empty" aerosol cans are characteristic reactive hazardous waste.

GP suggests that the preamble be revised to include the reactivity characterization of aerosol cans.

III. Current Federal Regulation of Aerosol Cans

The current federal regulations characterize aerosol cans as hazardous waste and subject them to the Resource Conservation and Recovery Act (RCRA) regulatory requirements. These requirements are burdensome and demand resources and time that would be better spent on conditions that are higher risk to the environment.

IV. Proposed Regulation as Universal Waste

The classification of aerosol cans as Universal Waste would simplify their handling and disposal. And, as Universal Waste, the aerosol cans would be sent to appropriate destination facilities.

Georgia-Pacific supports the proposed regulation.

V. CONCLUSION

Georgia-Pacific appreciates this opportunity to provide these Comments on these important proposed RCRA rules.