



**American
Forest & Paper
Association**

May 15, 2018

Tracy Atagi, Office of Land and
Emergency Management (5304P),
Environmental Protection Agency,
1200 Pennsylvania Avenue NW,
Washington, DC 20460

RE: EPA Proposal "Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations" 83 *Federal Register* 11654, Docket ID No. EPA-HQ-OLEM-2017-0463

Dear Ms. Atagi:

The American Forest & Paper Association is pleased to submit these comments in support of revising the RCRA Universal Waste regulations to include aerosol cans as proposed in 83 *Federal Register* 11654 on March 16, 2018.

The American Forest & Paper Association (AF&PA) serves to advance a sustainable U.S. pulp, paper, packaging, tissue and wood products manufacturing industry through fact-based public policy and marketplace advocacy. AF&PA member companies make products essential for everyday life from renewable and recyclable resources and are committed to continuous improvement through the industry's sustainability initiative - [Better Practices, Better Planet 2020](#). The forest products industry accounts for approximately four percent of the total U.S. manufacturing GDP, manufactures over \$200 billion in products annually, and employs approximately 900,000 men and women. The industry meets a payroll of approximately \$50 billion annually and is among the top 10 manufacturing sector employers in 45 states.

AF&PA's sustainability initiative - *Better Practices, Better Planet 2020* - comprises one of the most extensive quantifiable sets of sustainability goals for a U.S. manufacturing industry and is the latest example of our members' proactive commitment to the long-term success of our industry, our communities and our environment. We have long been responsible stewards of our planet's resources. We are proud to report that our members have already achieved the greenhouse gas reduction and workplace safety goals. Our member companies have also collectively made significant progress in each of the following goals: increasing paper recovery for recycling; improving energy efficiency; promoting sustainable forestry practices; and reducing water use.

AF&PA members generate waste aerosol cans. We do not collect comprehensive data on them, however, our members have provided us with anecdotal information on the number of cans generated and how they are managed. Members report that they generate from as few as 240 cans per year to as many as 6000 cans per year, depending upon the size of the facility. Most AF&PA members manage their cans by puncturing them to remove any remaining wastes (which wastes are then managed as either hazardous or industrial non-hazardous waste). The resulting empty cans are managed appropriately depending on whether they are hazardous waste.

Several members also stated that if the rule were to be promulgated, their facilities would be able to move from small to very small quantity generator status. This would result in resource savings without affecting environmental protection. In addition, a number of facilities noted that in order to do so in a compliant way, puncturing cans and managing the resulting waste is a resource intensive activity. And because resources are limited, identifying aerosol cans as universal waste would enable them to more easily manage those cans without necessarily emptying them on site. This would result in less likelihood of spills or other safety issues.

All of our responding companies believe that listing aerosol cans as universal waste would simplify their management in an environmentally protective manner which would result in greater compliance and likely some cost/resource savings. Therefore, AF&PA strongly support management of aerosol cans as universal wastes under the RCRA hazardous waste regulatory scheme.

We appreciate the opportunity to comment on this proposed rule. If you have any questions, please contact Amy Schaffer (amy_schaffer@afandpa.org or 202.463.5156).

Sincerely yours,

AMERICAN FOREST & PAPER ASSOCIATION



Jerry Schwartz
Senior Director,
Energy and Environmental Policy