



Paul Shorb
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May 15, 2018

Via Electronic Submittal to <http://www.regulations.gov>

Tiffany Collar
Office of Land and Emergency Management
Mail Code 5304P
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OLEM-2017-0463
Comments of AT&T Inc. and its Affiliates on proposed rule "Increasing
Recycling: Adding Aerosol Cans to the Universal Waste Regulations";

To Whom It May Concern:

AT&T Inc., on behalf of itself and its affiliates (collectively, "AT&T"), welcomes this opportunity to provide comments in response to the proposed rule, "Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations", published by the Environmental Protection Agency ("EPA") on March 6, 2018 (the "Proposal").¹ We understand that written comments are timely if submitted on or before May 15, 2018.

AT&T provides integrated communications services to households, businesses, and federal, state and local government agencies nationwide. In providing these services, AT&T uses a variety of aerosol products, including for example spray paint for marking locations of buried cable; brake and carburetor cleaners for AT&T's fleet of vehicles; lubricants for equipment maintenance; and others. Many of these aerosol products are used at AT&T sites that would be classified under EPA's hazardous waste regulatory regime as "very small quantity generators".

AT&T strongly supports EPA's initiative to facilitate collection and sound management of used aerosol cans by regulating them as "universal waste". AT&T also endorses the attached recommendations of the Environmental, Health & Safety Communications Panel to clarify and otherwise modify the Proposal in certain respects, which AT&T hereby incorporates by reference.

¹83 Fed. Reg. 11654.

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Sincerely,

A handwritten signature in black ink, appearing to read "Paul Shorb". The signature is fluid and cursive, with the first name "Paul" and last name "Shorb" clearly distinguishable.

Paul Shorb
AVP – Senior Legal Counsel
AT&T Services, Inc.

Attachment