

May 15, 2018

Tracy Atagi
Tiffany Kollar
Office of Land and Emergency Management
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Subject: Comments on Docket ID No. EPA-HQ-OLEM-2017-0463, Adding Aerosol Cans
to Universal Waste Regulations

Dear Ms. Atagi and Ms. Kollar:

Sevee & Maher Engineers, Inc. (SME) is providing the following comments in response to the proposed rulemaking for revisions to the Hazardous Waste and Universal Waste Management regulations, found in Title 40 of the Code of Federal Regulations (40 CFR) Parts 260 through 273 (Docket ID No. EPA-HQ-OLEM-2017-0463). SME provides regulatory compliance and environmental management consulting services for clients across the United States, and these comments are being provided in favor of the proposed rule on behalf of our experience working at our clients' facilities.

The addition of intact waste aerosol cans to the universal waste list will help to clarify common misunderstandings regarding the proper management of this waste stream, ease the regulatory and administrative burden on generators of waste aerosols, and improve compliance with hazardous and universal waste regulations.

The intact waste aerosol can waste stream meets the criteria for improved management as a universal waste. In particular, waste aerosol cans are generated by a large number of facilities throughout the country, and the ability to consolidate universal wastes between generators will improve management of the waste. Aerosol cans present a low risk during transport, and consolidating the wastes will improve recycling of the metal containers and proper disposal of the intact containers and contents of the aerosols.

The proposed rule does allow for the practice of depressurizing aerosols to continue, which will be beneficial for facilities that choose to manage this waste stream in that manner. The proposed requirements pertaining to safe operation of the depressurizer, including developing a written procedure for safe operation of the process, maintaining the manufacturer's instructions, training employees, good operating conditions, and maintaining clean-up materials, all follow manufacturers guidance and best management practices. We believe the requirements for the operation of a depressurization unit, as provided in the proposed 273.13(e), are sufficient for the proper operation of the depressurization unit.



Thank you for your time in identifying and working through these improvements to the universal waste regulations.

Regards,

SEVEE & MAHER ENGINEERS, INC.

A handwritten signature in black ink, which appears to read "Philip H. Gerhardt". The signature is fluid and cursive, with a long horizontal stroke at the end.

Philip H. Gerhardt, P.E.
Principal