



3921 Dewitt Avenue • Mattoon, Illinois 61938 • 217-234-7486 • Fax 217-234-7632

May 15, 2018

Dear Ms. Atagi:

Subject: Comments on EPA Proposed Rule
Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations

Justrite's business is providing product solutions to help our customers create safe working environments and comply to laws. We welcome the opportunity to participate and comment on this proposal. We would appreciate the EPA's consideration of the following comments:

- 1) It is remiss for the EPA to denounce this manufacturer's technology in its proposal, especially since the ETV program has been disbanded and can no longer re-evaluate the manufacturers product. (Ref: page 11661, middle column, second paragraph)
 - a. The ETV report referenced was conducted 19 years ago and was quoted out of context. The report recommended the product as safe to use as long as engineering and administrative controls etc.... were in-place.
 - b. The manufacturer paid for this program and considered it research and a learning experience. The manufacture's product instructions reflect the lessons learned in this report, including segregation of incompatible chemicals, chemicals not to be recycled, with instructions for engineering and administrative controls
 - c. The product has a steady track record of over two decades of safe use in the industry.
- 2) The EPA's proposal states: "it remains the responsibility of the operator to ensure that the puncturing device is properly draining the contents of the aerosol cans into the drum, that breakthrough is not occurring..." We would like to request some clarification on what constitutes breakthrough? In our conversations with you on Monday, May 14, you indicated that the intent of this proposal was not to make things more stringent than they currently are, so if it is the intent of the EPA to lower the emissions standard, how would the industry practically achieve it?
 - a. The ETV program no longer exists to verify manufactures claims, or to validate even a commercially engineered containment solution.
 - b. In our instructions, a charcoal filter needs to be replaced often to maximize collection of VOCs. The charcoal filter also acts as a flame arrester for safety. Even so, breakthrough can occur, which is why our instructions advises to use the puncturing device outside, in a well ventilated area.

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MEMO Continued

- c. We believe creating a standard for zero breakthrough is not practical. Breakthrough from puncturing a can with safe equipment and a safety protocol should not be an issue, especially when it is no worse than the use of an aerosol can in open air.

Thank you for the opportunity to participate in this rulemaking process.

**Thank You,
Glen**

Glen Carter
Sr. Product Design and Development Engineer
Justrite Manufacturing Company LLC

Phone: 217-238-5015
Fax: 217-238-5016
E-mail: GCarter@JustriteMFG.com
Web: www.justrite.com