The use and disposal of aerosol cans poses numerous health and safety risks to workers and the public due to their flammability, pressurized contents, and toxic materials (Safety Management Group, 2013). They are also demonstrably harmful to public health and the environment due to their effects on the atmosphere and the leaching of harmful chemicals from cans disposed in landfills ("4 Reasons", n.d.; Carlson et al., 2001; Kim et al., 2015). And although the probability of serious injury is relatively low (Yarbrough, 1998), United States manufacturing and automotive facilities alone use more than 1.6 billion aerosol cans annually, so it is important that they be managed responsibly ("Avoid Disposing", 2017).

I am in favor of the proposed rule because it will benefit the environment, streamline the disposal process, and decrease the regulatory burden on manufacturers and businesses while saving money and ensuring that hazardous materials are properly managed.

Changing aerosol cans' designation from hazardous to universal waste is appropriate and necessary because the specific nature of aerosol cans require unique management strategies to mitigate risks. Currently, the system for managing aerosol cans as hazardous waste is unnecessarily complicated and difficult. Cans are treated differently based on their volume, contents, and the disposal or recycling equipment and programs that exist at any particular location. The system is also inconsistent from place to place, as individual states may have stipulated more rigorous regulatory provisions for aerosol can disposal ("Aerosol Can Disposal", 2017). Streamlining the process of waste disposal by adding aerosol cans to the universal waste program will facilitate more standardized management of cans as well as ensure that they are properly dealt with in ways that prevent accidents or injuries and reduce the environmental impact of cans in landfills.

It has the potential to save businesses money as well. While disposal of hazardous materials can range from $0.79 per pound up to $25.00 per pound for different substances, other forms of universal waste have greater flexibility in pricing due to the more streamlined process of disposal, especially when recycling alternatives are considered (Indiana University, n.d.; EPA, 2016).

On the production and manufacturing side, a more streamlined process for aerosol can collection and disposal by universal waste handlers may have a large impact on both landfill capacities and environmental concerns through increased recycling programs that are facilitated by simplified and improved waste management ("Avoid Disposing", 2017; Bennett, 2014; "How to Recycle Aerosol Cans", n.d.).

In addition, since households are exempt from compliance with RCRA standards for dealing with hazardous waste, adding aerosol cans to the universal waste program may also have a large impact on consumer behavior and individual participation in recycling programs (EPA, n.d.). Many businesses already offer programs that assist homeowners in safely disposing of hazardous waste materials ("Household Hazardous Waste Disposal", n.d.), and the addition of aerosol cans to this list may prompt similar accommodations for households in tandem with industrial and commercial compliance with the new regulations.

In conclusion, I urge the approval of the proposed rule as well as its careful implementation and evaluation, particularly in the form of thorough research on the environmental impacts of the processing of waste aerosol cans during the disposal process, as I was unable to find any satisfactory scientific analysis of these topics. I further encourage

measures that will incentivize and facilitate increased recycling of waste aerosol cans due to the significant environmental and economic benefits that such an investment would stimulate.

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