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Public Comment

Topic: *Increasing Recycling: Adding Aerosol Cans to Universal Waste Regulations*

As a concerned citizen, the health and safety of the current and future generations of the United States citizens depends on the approval of the proposed ruling that has been put forth by the Environmental Protection Agency (EPA). The EPA plays a significant role in making sure the environment is protected from man-made and natural disasters. This protection is critical as the natural environment is vital to the essence of human, fauna, flora, and other living species' existence. We all depend on the health of the natural environment to continue providing us with natural resources that serve as a daily necessity for our food and water. With the mal-treatment and little understanding of the environment, human beings are destroying a natural gift and basic need that will continue to be needed by future generations. Therefore, the implementation of hazardous waste aerosol cans into the Universal Waste Program is a crucial step towards eliminating further depletion of our most precious gift, the Earth.

The proposed rule indicates that the EPA highly recommends that hazardous waste aerosol cans should be incorporated into the existing list of EPA's Universal Waste Program. Currently, the Universal Waste Program considers four different categories as universal waste under their regulations which includes: batteries, pesticides, mercury-containing equipment, and lamps (US EPA 2). According to Encyclopedia Britannica, aerosol cans are usually sold in metal containers that release products in the form of a mist or foam such as hairspray or shaving cream. The issue with aerosol cans is that they originally contained chlorofluorocarbon which is a hazardous

chemical compound used for the propellants of aerosol spray cans. After spraying the contents of the aerosol can, the compound is released into the air and soaked up by the ozone layer. The detrimental components of chlorofluorocarbon have been scientifically proven to decompose the ozone layer that is responsible for protecting all species on Earth from the powerful ultraviolet rays of the sun. Because of the harm that chlorofluorocarbon poses on Earth's creatures, the United States Federal government banned a majority of the uses of the compound in 1978. Manufacturers of aerosol can goods have replaced the destructive chlorofluorocarbon compound with hydrocarbons and carbon dioxide instead (The Editors of Encyclopedia Britannica).

Although the detrimental propellant compound of aerosol cans has been resolved, the question of whether the product continues to be hazardous remains. As we know, aerosol cans are used on a daily basis for products ranging from personal hygiene to home maintenance to pesticides. As per the Consumer Specialty Products Association (CSPA), the United States alone has manufactured 3.82 billion aerosol cans to be dispersed to varying industries in 2015 alone (US EPA 1). Overall, the proposed rule will affect 18,000 facilities in 18 industries (Ibid). The top two industries who utilize aerosol cans and will see the most affects by the proposed rule are Retail Trade and Manufacturing (Ibid). The total affected large quantity generators for Retail Trade and Manufacturing are 4,225 (65%) and 1,327 (20%), respectively (Ibid). Both the affected economic sectors make up the majority of the affected sectors. The United States is clearly experiencing an accumulation of aerosol cans in vast quantities; therefore, where are the 3.82 billion cans going after their short life span after being used by humans?

With no proper instruction on disposing aerosol cans, industries as well as households are throwing away the empty products into the regular solid waste garbage. Then, the cans and normal solid waste are transferred to landfills where the aerosol cans sit as hazardous waste as they are not biodegradable. When exposed to the sun, the aerosol cans pose alarming public and environmental health issues as the cans explode into metal shards and release the remainder of the toxic product to the Earth (US EPA 1). With the 3.82 billion aerosol cans manufactured and used in the United States yearly, landfills are storing a dangerous amount of aerosol cans that are flammable, release propellant compounds, and toxic excess product (Ibid).

The indicated magnitude of the harm placed on Earth is happening exponentially, yet, some humans are quick to neglect its existence regardless of obvious indicators such as reoccurring natural disasters caused by climate change. The implementation of aerosol cans into the EPA's current Universal Waste Program will create a nationwide understanding, appreciation, and stewardship towards protecting our environment by properly disposing of aerosol cans. The Universal Waste Program is important now more than ever. The only way to improve the Earth is not by talking about change but instead physically creating small, but impactful, changes that will transform the nation on a larger scale. As city planners, our role is to persuade policymakers of the importance of delicate matters as such. Therefore, I strongly believe that aerosol cans should become a part of the Universal Waste Program in order to implement proper disposal of aerosol cans. Thank you for your time.

Sincerely,

Christine Jimenez, Concerned Citizen and Graduate Student of Pratt Institute in Brooklyn, NY

References

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