

Thank you for allowing public comments on the 3/16/18 Federal Register rules about “Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations”. I read the rules with great interest, and have several questions/comments, which are due by 5/15/18.

My company already greatly reduces landfill disposal quantities by recycling our aerosol cans at an offsite recovery facility, and I hope these newly proposed rules do not affect us adversely. We pay substantially to recycle these cans, and have done so for several years, and I hope we can simply continue our current recycling methods.

1. Can you simply confirm that we can continue using our existing recycling methods?
2. If we’re currently reducing landfill disposal by recycling aerosol cans, are we exempt from these new proposed F.R. rules, and do we have to do anything differently?
3. If we’re currently recycling aerosol cans, do we have to start managing them as universal waste, or can we continue the same exempt recycling practices?
4. Do we have to puncture all aerosol cans before recycling, or remove all actuators, if stored in non-leaking containers during transport, or can we continue our current recycling methods?
5. Do we have to empty all propellant and other contents before future recycling activities? This would force us to purchase recovery equipment, and likely require an air permit modification for fugitive emissions. We’d also need to hire someone to run the recycling equipment and inherit potential personnel safety issues due to release of propellants.
6. We’re worried that after years of proper recycling, we may experience adverse penalties as you try to regulate those companies who are not currently recycling. This may affect our air permit, require us to buy puncture equipment, increase our labor costs, and take safety risks. This seems unfair to a company that is recycling now and has been recycling perfectly for years.
7. Definitions are provided in several locations, but please clarify the specific definition of handler, at each facility type: for aerosol can generators, recyclers/transporters, and final destination/TSD facilities. Or does each facility have a handler of some sort? Can handlers work at all places above, or just the final destination?

Thanks very much for allowing us to submit these comments, suggestions, and questions.