Increasing Recycling: Adding Aerosol Cans to Universal Waste Regulations

I'm a graduate student from Pratt Institute studying City and Regional Planning. As an advancement in academics I'm working on developing sustainable strategies for villages in Steuben County where waste management is one of the key aspect for moving towards a sustainable development. The regulation caught my interest as it is a step for streamlining waste management for aerosol products which are expanding very rapidly.

Aerosol cans are handy items, but their disposal may pose special risks to environment. They offer wide range of products especially mass-market goods such as household and cosmetic. According to Consumer Specialty Products Association (CSPA) aerosol pressurized products survey revealed that the estimated total units filled in the U.S. in 2011 was 3.782 billion representing a 1% increase than 2010. (Consumer Specialty Products Association, 2012) The survey also found out that personal care products are said to be the second largest category in the aerosol products. They are harmful to human health due to their psychoactive effects which may interfere with regular functioning of the body. (Hubbard, 2017) Improper disposal, leakage and mishandling of aerosol cans can lead to serious environmental concerns such as release of emissions, leaching and damage to the air quality.

I am in a strong favor of the proposed rule because despite fall in personal care, overall aerosol production is rising, and component suppliers are still expanding. (Yeomans, 2013) This expansion requires unique management and disposal strategies which can be accomplished through the EPA's proposal of adding hazardous waste aerosol cans to the list of universal waste regulation. The regulation will ease regulatory burdens on retail stores for discarding

aerosol cans, promote collection and recycling and will encourage development of programs to reduce the quantity of these wastes going to landfills or combustors. (Environmental Protection Agency, 2018) EPA's specific stringent management standards for puncturing and draining of aerosol cans will also safeguard workers who are responsible for this activity.

A single aerosol can doesn't take up much space, but 1.6 billion cans which is produced annually by United States would require acres and acres of landfill space. (Karen, 2018) In this case, the proposal would prevent tons of aerosol cans to pile up on landfills and instead would be recycled reducing hazardous waste. The idea of not having a size limit and volume for aerosol cans can widely help in changing retail and household behavior as recycling process would begin at source making waste handling and managing less complex. The standards also include labelling, a requirement to respond to releases, and transport to a facility that is permitted or otherwise designated for receiving hazardous waste. (Enviro.BLR, 2017) Although the proposed rule is largely in line, there are several aspects for noteworthy to achieve maximum results. The empty aerosol cans would be excluded from universal waste rule, but it be should strictly monitored that the cans are properly deemed empty as some cans may exhibit the characteristic of reactivity. The new requirements for puncturing and draining as a part of recycling process should be established. As according to EPA, "states.... would have to adopt the universal waste regulations for aerosol cans", it would be beneficial if the rule is a mandate for each state to reduce landfill burden and global environmental issues. The proposed rule is silent on the requirements that would apply to aerosol waste shipments

between states that adopt the rule and states that do not, therefore mandating would also ease transportation concerns.

Concluding, I impel that the rule should be passed to relief regulated community as tiny particles from aerosol cans can lead to big impacts.

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