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November 2, 2021

via electronic transmission

Colorado Solid and Hazardous Waste Commission
Colorado Department of Public Health & Environment
4300 Cherry Creek Drive S
Denver, CO 80246-1530
cdphe.hwcrequests@state.co.us

Subject: Amendment of 6 CCR 1007-3, Parts 260 and 273 – Regulations Pertaining to Hazardous Waste – Modification of Universal Waste Regulations Regarding Aerosol Cans

To the Commissioners of the Colorado Solid and Hazardous Waste Commission,

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to offer comments to the Solid and Hazardous Waste Commission on the proposal² to amend Colorado's Hazardous Waste Regulations which modifies Colorado's Universal Waste Regulations regarding aerosol cans. HCPA supports the proposed changes to maintain consistency with EPA's Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations³ rule.

HCPA represents a wide range of products, from household cleaners and air fresheners to commercial disinfectant and pest control whose use of aerosol technology makes the aerosol industry an integral part of the household and commercial products industry. HCPA has represented the U.S. aerosol products industry since 1950 through its Aerosol Products Division, representing the interest of companies that manufacture, formulate, supply and market a wide variety of products packaged in an aerosol form.

The proposed amendments to Colorado's Hazardous Waste Regulations not only maintains consistency with the Federal Resource Conservation and Recovery Act (RCRA), but it ensures that programs developed in Colorado can also be safely and universally implemented in other states so that waste handlers with multiple locations within the United States can have one

¹ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

² The Proposed Amendments can be found at <https://drive.google.com/file/d/1s6KOjsY1yTlrBk9UIPCZzJqyrK1VWeZn/view>

³ 83 FR 11654-11667; <https://www.govinfo.gov/content/pkg/FR-2018-03-16/pdf/2018-05282.pdf>

consistent program to handle aerosol cans across multiple sites. The modification continues to provide flexibility for handlers of discarded waste aerosol cans and lessens the regulatory burden on the regulated community, allowing more aerosol cans that are properly discarded to be recycled. Further, it promotes the collection and recycling of aerosol cans and encourages the development of municipal and commercial programs to reduce the quantity of aerosol can waste going to municipal solid waste landfills.

For the reasons stated above, HCPA supports the proposed revisions to the Colorado Hazardous Waste Regulations. If you have any questions about our support or about aerosol cans, please do not hesitate to contact me directly at (202) 833-7304 or ngeorges@thehcpa.org.

Sincerely,

A handwritten signature in cursive script that reads "Nicholas Georges".

Nicholas B. Georges
Senior Vice President, Scientific and International Affairs
Household & Commercial Products Association