



Innovative Products For **Home. Work. Life.**

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via electronic transmission

Anna Bourakovsky
Program Manager
Vermont Department of Environmental Conservation
Waste Management and Prevention Division
1 National Life Drive – Davis 1
Montpelier, Vermont 05620-3704

Subject: Proposed Vermont Hazardous Waste Management Regulations

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to offer comments to the Vermont Department of Environmental Conservation (DEC), Waste Management and Prevention Division on their proposal² to amend the Vermont Hazardous Waste Management Regulations (VHWMR). The amendments include adding aerosol cans in Vermont's Universal Waste Program. HCPA supports DEC's proposed changes as it is based on 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 the VHWMR not only maintains consistency with the Federal Resource Conservation and Recovery Act (RCRA), but it provides a clear, protective system for managing discarded waste aerosol cans; alleviates the regulatory burden on retail stores, aerosol product manufacturers, aerosol product marketers and others that discard waste aerosol cans by reducing the number of cans that must be treated as hazardous waste; promotes the collection and recycling of aerosol cans; and encourages the development of

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 VHWMR can be found at <https://dec.vermont.gov/sites/dec/files/wmp/HazWaste/Documents/Regulations/2021%20Proposed%20VHWMR.pdf>

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

municipal and commercial programs to reduce the quantity of aerosol can waste going to municipal solid waste landfills.

The proposed revision incorporates 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. Through this proposal, DEC ensures that programs developed in Vermont can also be safely and universally implemented in other states so that waste handlers with multiple locations within the United States can have one consistent program to handle aerosol cans across multiple sites.

For the reasons stated above, HCPA supports DEC's proposed revisions to the VHWMR. 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

Vice President, Scientific and International Affairs
Household & Commercial Products Association