

Comment Summary Response
Universal Waste Regulations: Addition of Aerosol Cans
(LAC 33:V.105, 305, 1501, 2201, 3801, 3805, 3812, 3813, 3821, 3823, 3841, 3843,
3845, and 4301) (HW134ft)

COMMENT 1: The Household & Commercial Products Association (HCPA) appreciates the opportunity to offer comments to the Louisiana Department of Environmental Quality (LDEQ) on proposed rule HW134ft, which would include aerosol cans in Louisiana's Universal Waste program. HCPA supports LDEQ's proposed rule as it is based on the EPA's Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations rule.

FOR/AGAINST: No arguments necessary; comment does not suggest amendment or change.

RESPONSE 1: The department appreciates the support.

COMMENT 2: 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, market a wide variety of products packaged in an aerosol form.

FOR/AGAINST: No arguments necessary; comment does not suggest amendment or change.

RESPONSE 2: The department appreciates the support.

COMMENT 3: The proposed revision to Louisiana's universal waste program 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 municipal and commercial programs to reduce the quantity of aerosol can waste going to municipal solid waste landfills.

FOR/AGAINST: No arguments necessary; comment does not suggest amendment or change.

RESPONSE 3: The department appreciates the support.

COMMENT 4: 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, LDEQ ensures that programs developed in Louisiana 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/AGAINST: No arguments necessary; comment does not suggest amendment or change.

RESPONSE 4: The department appreciates the support.

COMMENT 5: For the reasons stated above, HCPA supports LDEQ's proposed rule.

FOR/AGAINST: No arguments necessary; comment does not suggest amendment or change.

RESPONSE 5: The department appreciates the support.

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COMMENT #

SUGGESTED BY

01 – 05

Nicholas Georges, Household & Commercial Products
Association

Comments reflected in this document are repeated verbatim from the written
submittal.

Total Commenters: 01

Total Comments: 05