

July 31, 2020

MEMORANDUM

TO: Richard E. Dunn, Director
Environmental Protection Division

FROM: Charles J. Mueller, Chief CJM
Land Protection Branch

SUBJECT: Responses to Comments Received During the Public Comment Period Regarding
Proposed Revisions to the Rules for Hazardous Waste Management, Chapter 391-3-11

On May 26, 2020, EPD issued a public notice requesting comments on the proposed revisions to the Georgia Rules for Hazardous Waste Management, Chapter 391-3-11.

The proposed changes include the following rule:

Rule 391-3-11-.01 is being amended to include regulations published by EPA through December 9, 2019; these updates are proposed by incorporating the following federal regulations:

Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations (December 9, 2019; 83 FR 11654-11667) Creates a new category of universal waste which allows generators the option to manage hazardous waste aerosol cans under a more streamlined set of regulations.

A public hearing was held at 1:00 pm on June 10, 2020 via Zoom. One comment was received during the hearing from the Household and Commercial Products Association (HCPA), which represents companies that manufacture, formulate, supply and market aerosol products. HCPA expressed their support for the adoption of the Aerosol Can Rule to maintain consistency with EPA and other states; they believe the rule incorporates flexibility for handlers of discarded waste aerosol cans and lessens the regulatory burden on the regulated community. EPD concurs and no changes were made. No written comment letters were received.