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ELECTRONIC DELIVERY

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U.S. Environmental Protection Agency
Office of Land and

of the nation's public and private infrastructure.² The construction industry (residential and nonresidential) comprises a high number of small businesses. Ninety three percent have fewer than 20

AGC

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remote areas may have limited or no universal waste management options, as discussed elsewhere in this letter.

Because the universal waste rule allows universal waste to be consolidated into a larger shipment for transport to a destination facility, under the proposed addition to the rule, it would be more economical to send hazardous waste aerosol cans to recycling for recovery of metal values, rather than sending them for disposal, EPA says.

Clarification Needed

Very Small Quantity Generators (VSQGs) – Companies that generate a very small amount of waste and are not otherwise designated as a small or large quantity generator of hazardous waste under their state's regulations, would most likely qualify for EPA's streamlined standards for VSQGs. As EPA notes in the *Federal Register* notice: "Under 40 CFR 262.14, very small quantity generators (VSQGs), defined as facilities that generate less than or equal to 100 kilograms of hazardous waste in a calendar month, are not subject to the RCRA subtitle C hazardous waste management standards, provided they send their waste to a municipal solid waste landfill or non municipal nonhazardous waste facility ap/TT1328567/015.1Tf3.63930T00898003d

regulation (and guidance). AGC urges EPA to clearly

