

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

June 24, 1992

Mr. John P. Nash  
Attorney at Law  
13254 La Quinta St.  
La Mirada, CA 90638

Dear Mr. Nash:

Thank you for your letter dated May 11, 1992 regarding the recycling and processing of spent aerosol cans. In your letter, you raise two specific questions: 1) should you follow up with Region IX or has Headquarters addressed the question of aerosol processing and 2) could processing of spent aerosol cans be done outside of California and exempted under "the RCRA recycling exemption".

In answer to your first question, you should follow up with Region IX in San Francisco, CA. Therefore, we are referring your letter to Mr. Jeffrey Zelikson, Director of the Hazardous Waste Management Division of Region IX. Mr. Zelikson can be reached at (415) 744-1730. Regarding your second question about exempting processing of spent aerosol cans under a RCRA recycling exemption, because of the considerable variation of environmental risks posed by different aerosol cans, these determinations will be made by each EPA region on a case-by-case basis.

Thank you again for your interest in this matter. If you have further questions regarding this referral, please contact Paul Borst of my staff at (202) 260-8551.

Sincerely,

Dave Bussard, Director  
Characterization and Assessment Division

FaxBack # 11674