

## Evaluation of Existing Regulations: Institute of Scrap Recycling Industries May 15th Comments



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05/30/2017

The United States Environmental Protection Agency ("EPA") published a Notice for Public Comments titled:

*Evaluation of Existing Regulations ("Evaluation")*

See 82 Fed. Reg. 17793.

EPA states that the Evaluation was issued in support of President Trump's Executive Order 13777 (Enforcing the Regulatory Reform Agenda).

The Institute of Scrap Recycling Industries ("ISRI") submitted May 15th comments on the Evaluation.

ISRI describes itself as a national trade association with 21 chapters that represent more than 1,200 companies operating in nearly 3,000 locations in the United States and 34 countries that "process, broker, and consume scrap commodities, including metals, paper, plastics, glass, rubber, electronics, and textiles."

ISRI's comments describe what it characterizes as its contributions to environmental stewardship and the country's economic strength and asks that their benefits and dependence on government policies be recognized. The organization identified the following regulations that it states have negatively impeded continued growth of the industry and are in need of repeal, replacement or modification:

- Modification of Subtitles C & D of the Resource Conservation and Recovery Act (to distinguish scrap commodities destined for recycling from waste destined for disposal)
- The Federal Multi-Sector General Permit contains provisions, specifically benchmarking, that make achieving compliance uncertain and, at best, difficult
- The refrigerant management regulations at 40 C.F.R. § 82, Subpart F, pursuant to Title VI of the Clean Air Act (need to be revised to require removal of refrigerant from appliances and vehicles prior to their delivery for recycling, consistent with the specific language of § 608(b)(1) of the Clean Air Act Amendments of 1990)
- The Chemical Data Reporting regulations at 40 C.F.R. § 711, pursuant to the Toxic Substances Control Act (need to be revised to eliminate the current reporting requirements for small annual amounts of scrap metal imported for recycling. . .)
- Elimination of regulatory conflicts

[A copy of the comments can be downloaded here.](#)