

# Retail Hazardous Waste:

*Overview of consumer products industry activities supporting retailers' handling of hazardous waste*

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***Consumer Products Industry Sustainability  
Partnership with Retailers and Regulators:  
Retail Hazardous Waste***

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Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes  
Automotive Care - Antimicrobial - Pest Management

# Consumer Specialty Products Association

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CSPA members make a wide variety of **formulated consumer specialty products** that are **packaged in many forms** and **sold through retailers**.

- **disinfectants** that kill germs in homes, hospitals and restaurants;
- **air fresheners, room deodorizers and candles** that eliminate odors;
- **pest management products** for home, lawn and garden, and pets;
- **cleaning products and polishes** for use throughout the home and institutions;
- **products** used to protect and improve the performance and appearance of **automobiles**;
- **aerosol products** and a host of other products used every day.

# Now & Next

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## *CSPA working **with** retailers on changes to RCRA*

**Supporting EPA's suggestions for reducing unnecessary regulatory burdens on the management of aerosol products that cannot be sold by a retailer.**

- *In cooperation with RILA*

# CSPA Will

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- *Assist retailers in understanding how CSPA member manufacturing facilities handle waste products at manufacturing sites, since this could assist them in establishing effective and compliant systems for handling waste products.*
- CSPA member companies' knowledge of their products is an integral part in retailer waste management programs.

# Key Concepts

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- **Reverse distribution should be allowed in the retailer chain** to make appropriate decisions on what products can be sold or donated for use and what products need to be handled as waste under appropriate RCRA classifications.
  - Enabling the viability of secondary markets, recycling, and other sustainably reasonable options.
- **Aerosol products and other intact consumer products** determined to be waste should be classified as **Universal Waste** under RCRA.
- **EPA should clarify that aerosol products do not meet the characteristic of reactivity** under RCRA, and **encourage state and local authorities to be consistent in this classification.**
- EPA should assure that **RCRA facilitates**, and does not in any way discourage, **the appropriate and effective recycling and materials recovery of aerosols and other consumer products.**

# Consumer Products Industry, Retailers and Regulators Working Together

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