



Northeast Waste Management Officials' Association

October 9, 2015

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U.S. Environmental Protection Agency
EPA Docket Center (Mail Code 2821T)
OSWER Docket
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

Attention: Docket ID No. EPA-HQ-RCRA-2012-0121

RE: Proposed Rule, Hazardous Waste Generator Improvements (80 FR 57917)

Dear Sir/Madam:

The Northeast Waste Management Officials' Association (NEWMOA) respectfully requests a 60-day extension of the comment period for EPA's Hazardous Waste Generator Improvements proposed rule, published in the *Federal Register* on September 25, 2015. As you are aware, the proposed rule for Management Standards for Hazardous Waste Pharmaceuticals was published on the same day with the same comment period. Therefore, the current 60-day comment period is insufficient to allow full analysis of each rule, so we are formally requesting an extension.

Revising the rules pertaining to hazardous waste generators is of great importance to NEWMOA's members, who depend on the Association to facilitate analysis of the proposal and suggest comments. We plan on commenting on this proposal, but as both rules impact the hazardous waste program, we require more time than the current deadline of November 24, 2015 will afford.

The extended comment period will provide adequate time to evaluate and consider the multiple issues presented in the proposals and to prepare a detailed response. Thank you for your consideration of NEWMOA's request.

Sincerely,

CT DEEP
NEWMOA Chair

cc: Barnes Johnson, Director, Office of Resource Conservation and Recovery
Betsy Devlin, Director, Materials Recovery and Waste Management Division, ORCR
Jessica Young, Branch Chief, Materials Recovery and Waste Management Division, ORCR
NEWMOA Hazardous Waste Steering Committee
NEWMOA Board of Directors