



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-2007-0932

RE: Proposed Rule, Management Standards for Hazardous Waste Pharmaceuticals (80 FR 58013)

Dear Sir/Madam:

The Northeast Waste Management Officials' Association (NEWMOA) respectfully requests a 60-day extension of the comment period for EPA's Management Standards for Hazardous Waste Pharmaceuticals proposed rule, published in the *Federal Register* on September 25, 2015. As you are aware, the proposed rule for Hazardous Waste Generator Improvements 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.

Proposing new rules pertaining to the management of hazardous waste pharmaceuticals is of great importance to NEWMOA's members who depend on the Association to facilitate an 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