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# Non-Hazardous Secondary Materials: U.S. Environmental Protection Agency Notes Materials Lifecycle Management Company Name Change to NuCycle Energy

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The United States Environmental Protection Agency (“EPA”) published in its RCRA Online database a September 10th letter from Materials Life Cycle Management Company (“MLCM”) referencing a name change to NuCycle Energy.

The September 10th letter to EPA stated:

...as published in RCRA Online Number 14898 (document date 2019-3-27) and entitled “Non-Hazardous Secondary Materials Name Change”, the USEPA was informed that International Paper Products Corporation had changed its name to Materials Lifecycle Management Company.

The September 10th letter further stated that:

...International Paper Products Corporation, RCRA Online Number 14859 (document date 2011-10-05) was provided a letter from USEPA that indicated:

EPA believes the 40 CFR Part 241 regulations would identify Enviro-Fuelcubes (EFC), composed of non-hazardous raw material feedstocks such as paper and other materials, generated by the International Paper Products Corporation (IPPC) and burned in combustion units as a non-waste fuel.

The federal non-hazardous secondary materials rule generally establishes standards and procedures for identifying whether non-hazardous secondary materials are solid waste when used as fuel or ingredients in combustion units. These regulations provide the standards and procedures for identifying when non-hazardous secondary materials burned in combustion units constitutes solid waste.

Section 129(a)(1)(D) of the Clean Air Act requires that EPA establish standards for commercial and industrial solid waste incinerators which burn solid waste. The term “solid waste” is defined by Section 129(g)(6) of the Clean Air Act to provide that the term “solid waste” is established by EPA under the Resource Conservation and Recovery Act.

A copy of the document from the EPA database can be downloaded [here](#).