

SEP 11 1985

MEMORANDUM

SUBJECT: Final Manual in Response to PIRT Recommendation for
Guidance on Notification of Solid Waste Disposal
Obligations

FROM: Martha G. Prothro, Director
Permits Division (EN-336)

TO: Rebecca W. Hanmer, Director
Office of Water Enforcement and Permits (EN-335)

Attached for your review is a final guidance manual written in response to recommendation A7 (Notification of Solid Waste Disposal Obligations) in the Pretreatment Implementation Task Force (PIRT) final report. The manual is titled RCRA Information on Hazardous Waste for Publicly Owned Treatment Works.

This manual is designed to assist POTW personnel, and local industries served by a POTW, in understanding their respective responsibilities under RCRA. 40 CFR 403.8(f)(2)(iii) requires POTWs to notify industrial users of any applicable requirements under section 204(b) and 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act. Included in this manual is a notification brochure (Appendix B) that can be copied and mailed out to industrial users by the POTW.

This document covers a broad area of RCRA requirements and we therefore, sought review by the Office of Solid Waste. Specifically, we worked closely with the Studies and Methods Branch (Alan Corson), Waste Identification Branch (Matt Strauss and staff), Implementation Branch (Steven Levy and staff), and Waste Treatment Branch (Linda Galor). In addition, the manual was sent to the Regions (both Water Management Divisions and RCRA Divisions) for their review and comment. The final manual reflects this review.

I have sent the final manual to OW, OPPE, OWRS, OGC, and the Enforcement Division for any additional comments. I am expecting responses by September 18. We must have the manual to the printer by September 20 in order to meet our work plan schedule. September 20 is the last day FY 85 printing requests will be accepted.

Please let me know if you would like to arrange a meeting to discuss the manual in more detail.

Attachments

Guidance Manual
Comments from the Regions with HQs Response
Publication/Printing Form

DLEE:gj:EN-336:50750:9-10-85
Lex. Disk #3