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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUN 30 1989

OFFICE OF  
WATER

MEMORANDUM

SUBJECT: Pollution Prevention Initiative for Class I  
Hazardous Waste Wells

FROM: Michael B. Cook, Director *Michael B Cook*  
Office of Drinking Water (WH-550)

TO: Water Division Directors  
Regions I - X

As you may know, the Administrator has made pollution prevention one of his top priorities for the Agency. This effort is intended to promote recycling, reuse, and, most of all, reduction at the source of generation. Hazardous waste injection is a good candidate through which to promote this new program because of the large volumes of wastes handled by this method.

In addition, §3005(h) of the Hazardous and Solid Waste Amendments of 1984 (HSWA) mandates that hazardous waste generators who dispose of their waste on-site shall include the following certifications as permit conditions:

- (1) the generator of the hazardous waste has a program in place to reduce the volume or quantity and toxicity of such waste to the degree determined by the generator to be economically practicable; and
- (2) the proposed method of treatment, storage, or disposal is that practicable method currently available to the generator which minimizes the present and future threat to human health and the environment.

In order to aid the generators in meeting their statutory requirements and to participate in the Agency goals for pollution prevention, we are requesting Regional Offices to explore the options for including a waste minimization schedule in all new and reissued Class I hazardous waste well permits. We should also encourage Primacy States to take the initiative to include similar requirements in permits issued from their delegated authorities.

Such a schedule would highlight industry efforts in reducing pollution, while providing goals for the near future. Similarly, waste minimization and pollution prevention efforts and statistics should be routinely mentioned in permit fact sheets and at public hearings.

If you have any questions about this effort, please contact Bruce Kobelski at FTS 382-5508.