

PPC 9522.1984(03)

PERMITS ISSUED TO BOTH OWNERS AND OPERATORS IF DIFFERENT
PEOPLE

30 JUL 1984

MEMORANDUM

SUBJECT: Issuance of RCRA permits to Facility Owners and Operators

FROM: John Skinner
Director, Office of Solid Waste (WH-563)

TO: Regional Division Directors, Regions I-X

This office continues to learn of RCRA permits being issued only to facility operators in those instances where the facility operator and the facility owner are different people. Section 270.1(c) requires that "owners and operators of hazardous waste management units must have permits during the active life (including closure) of the facility..." In addition, §270.10(b) requires the operator to apply for the permit and the owner to sign the application along with the operator when the facility operator and owner are different persons (see §270.10(b)).

Please ensure in the future that all RCRA permits are issued to both the owner and operator of the facility in those cases where the facility is owned by one person and operated by another.

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