

PPC 9472.1986(04)

PERMITS FOR PLACEMENT OF HAZARDOUS WASTE IN  
UNDERGROUND SALT MINES

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

4 JUN 86

Mr. John Richard Slate  
City Attorney  
Suite 204  
10551 Allen Road  
Allen Park, Michigan 48101

Dear Mr. Slate:

This is in response to your April 30, 1986, letter to Congressman John Dingell regarding the Crystal Mines in Detroit, Michigan. Mr. Dingell has requested that we keep you informed of any developments pertaining to this matter.

The Resource Conservation and Recovery Act (RCRA) allows the placement of hazardous wastes, other than bulk liquids, in salt mines if a RCRA permit is issued. Crystal Mines, Inc. (CMI) thus could apply not for a RCRA permit for the placement of containerized or solid hazardous waste. You should be aware that neither EPA nor the Michigan Department of Natural Resources (MDNR) has yet received an application for CMI.

Depending on site-specific factors, however, it may be more appropriate to consider permitting the Crystal Mines facility under new, special regulations for "miscellaneous" hazardous waste management units. These rules are likely to be used for permitting most placement of containerized or solid hazardous waste in underground mines. The rules will be proposed this summer for public comment and will be issued in final form early in 1987.

Once a permit application is received, EPA and MDNR would consult with each other during careful review of the application. The consultation process provides assurance that all the RCRA permitting requirements designed for the protection of human health and the environment are satisfied before the permit is issued. These requirements include monitoring, corrective action, closure and post-closure care, and financial assurance. Because of the many new requirements imposed by the Hazardous and Solid Waste Amendments of 1984, it is likely that any permit issued to CMI would be issued jointly to EPA and MDNR.

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The RCRA permitting process also includes public participation through comments on a draft permit. Usually, the notice of intent of a permit decision and opportunity for public comment is provided in local newspapers, on radio, and to local groups on EPA or MDNR mailing lists. The schedule for public input to the permitting process in this case is uncertain, since we have not yet received a permit application from CMI.

Thank you for your interest in this important hazardous waste issue.

Sincerely,

J. Winston Porter  
Assistant Administrator

cc: Honorable John D. Dingell  
Richard Traub, Region V  
James Roberts, MDNR

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