

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

July 11, 1985

Mr. R. R. Saulsman, Manager
Energy & Environmental Affairs
The Boeing Company
P.O. Box 3707
Seattle, Washington 98124-2207

Dear Mr. Saulsman:

Thank you for your letter of June 5, 1985, concerning the waste minimization statement which generators will be required to sign on the Uniform Hazardous Waste Manifest (UHWWM) effective September 1, 1985.

As you indicated when you originally spoke to Carolyn Barley in May, your concern was that Boeing Company employees would be reluctant to sign this statement because as individuals they do not have a waste minimization program in place as required by the statement. Our suggestion *in* response to your concern was for the employee signing the statement to include under the signature line in Item 16 the phrase, on behalf of The Boeing Company." You indicated in your letter that this solution is satisfactory provided that this phrase can be preprinted on the form. Of course, the individual signing the statement is responsible for the veracity of the statement, as is the company.

We recognize that preprinting this phrase on the form would be a more efficient and less time consuming procedure than requiring Boeing employees to write it in by hand. Additionally, the Agency's March 20, 1985, regulations on the UHWWM do not specifically preclude you from preprinting this phrase on the form. Therefore, I have no objections to your proposal.

If you have other questions about the waste minimization statement or the UHWWM system, I suggest that you again contact Carolyn Barley (202-382-2217).

Sincerely

John H. Skinner, Director
Office of Solid Waste

Faxback# 11090