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## PERMITTING OF HAZARDOUS WASTE INCINERATORS

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### Guidance for Permitting of Hazardous Waste Incinerators

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#### Regional Hazardous Waste Division Directors

As you are aware, the amendment for hazardous waste incinerators was published in the Federal Register on June 24, and was accompanied by a notice announcing that the suspension on calling Part B's for incinerators has been lifted. The "information on calling clearance from OMB was also received recently (clearance §2050-0002). The Agency is thus in a position to begin the permitting process for these facilities. This memorandum is intended to provide guidance as to the priorities which should be followed in formulating regional plans for permitting incinerators.

In Rita Lavelle's memorandum of June 18 to the Regional Administrators various targets were set for the numbers of incinerator permits to be issued in FY 83 and the number to be called in FY 83 for issuance in FY 84. These targets were set for each region on the basis of the permitting resources projected to be available. Assuming roughly a year's time from the time a permit is called to when it is issued, adherence to the targets will necessitate calling a substantial number of incinerator Part B's during the remainder of this fiscal year, and during the first quarter of FY 83. Incinerators must be considered to be the first priority of the RCRA permitting program in the coming months.

In establishing priorities for permitting of hazardous waste incinerators we expect to use the same general approach we have been using for storage facilities. That is, new facilities will be assigned the highest priority for permit issuance, and existing facilities should be prioritized according to their potential for causing environmental harm. The following are factors which should be considered in ranking existing incinerators for calling Part B applications:

Age of the facility  
Size  
Proximity to population centers  
Complexity of the waste mixtures incinerated  
Toxicity of the wastes incinerated  
Prior history of poor operation or air pollution  
violations

It should be expected that most incinerator facilities will also have some type of storage capability at the site. In such cases the Part B should be called for both the incinerator and the storage facilities. These storage facilities can be counted against the permitting targets in Attachment 1 of Rita Lavelle's June 13 memorandum, according to the specified substitution ratios.

If there are any questions regarding the incinerator permitting program, please contact Randy Chrismon of my staff at 382-4535.