

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

May 5, 1994

MEMORANDUM

SUBJECT: Revised Draft of Risk Assessment Implementation
Guidance for Hazardous Waste Combustion Facilities

FROM: Michael Shapiro, Director
Office of Solid Waste

TO: Waste Management Division Directors, Regions I-X

This memorandum transmits the latest revision to the implementation guidance for conducting risk assessments at RCRA hazardous waste combustion units.

Based on comments received on the September 23, 1993, and November 19, 1993, drafts, we have significantly updated the guidance in the following areas: 1) the list of constituents to be considered for the risk assessment, 2) the additional considerations needed in conducting a trial burn to satisfy risk assessment needs, and 3) specific procedures for conducting a screening level risk assessment. The screening guidance was developed as a joint effort with the Office of Emergency and Remedial Response.

We are particularly interested in your comments and suggestions on this new material, especially whether you think the level of detail provided is useful and appropriate.

Related Activities

As you recall, the implementation guidance was developed to assist in applying the Agency's draft guidance on indirect risk assessment to RCRA facilities. The Agency's draft guidance, in the form of a Draft Addendum to the 1990 ORD report "Methodology for Assessing Health Risks Associated with Indirect Exposure to Combustor Emissions, was sent out for public comment and Science Advisory Board (SAB) review in November of 1993. Extensive public comments have been received, and the SAB final report is due soon. ORD estimates that the reviewing and responding to all the comments and then revising the Addendum will take at least several months.

Another related activity is the review of the risk assessments which have already been done or are underway. We have been working with the Regions on several of these assessments and have put together a work group including Regional and ORD representatives to proceed with additional reviews as needed. We would appreciate any feedback you or your staffs have on this process so far.

We hope to incorporate the results of your review of the implementation guidance soon, so that we can provide a more useful document to those conducting the risk assessments. Therefore we are asking that you provide comments on this material by May 26. If you have any questions, please contact Alec McBride at 202-260-4806.

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