

9551.1990(01)

INDUSTRIAL WASTE DISPOSAL IN PROXIMITY TO WETLANDS

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MAY 9 1990

MEMORANDUM

SUBJECT: RCRA Waste Disposal Sites and Their Potential
Association with Wetlands

FROM: Sylvia K. Lowrance, Director
Office of Solid Waste

TO: Tom Kelly, Director
Office of Regulatory Management and Evaluation

Thank you for your memorandum of April 9, 1990, in which you discuss the need for an assessment of industrial waste disposal facilities and their proximity to wetlands, and suggest that we coordinate a joint effort to examine these issues.

My office also shares a serious concern that many waste management facilities--hazardous as well as non-hazardous--are located in sensitive locations, including wetlands. We have several efforts underway to analyze and, where appropriate, control the risks posed by facilities in sensitive locations, including in or adjacent to wetlands.

First, we expect to promulgate this summer revised criteria for municipal solid waste facilities, and a notification requirement that will apply to industrial solid waste disposal facilities and to construction/demolition waste landfills. The revised criteria for municipal facilities will incorporate location standards, under which new facilities cannot be sited in or adjacent to wetlands unless there is no alternative impacts will be minimized, and any wetlands that are destroyed will be offset by the creation of new wetlands. The notification requirement would include formation on latitude and longitude, which would enable us to access geographic information systems and determine proximity to sensitive locations.

Second, it is our intention to request funding to complete, distribute and evaluate the Industrial D Survey. Completion of the survey can occur in tandem with the notification process described above, and distribution of the survey can be targeted to the facilities identified in the notification process. This survey will provide a comprehensive view of waste types, volumes and management practices at industrial solid waste facilities for a large sample of facilities. When coupled with information on proximity to sensitive locations, this information will enable us to characterize the potential risks posed by facilities in or adjacent to wetlands.

Another major effort is the development of location standards for hazardous waste management facilities. In the near future the draft proposed location standards will enter Red Border review. Under this proposal, wetlands would be one of the sensitive locations in which the siting of hazardous waste facilities would be restricted.

Finally, we are initiating an effort to characterize the market and non-market values associated with wetlands due to a variety of functions such as flood control, water quality improvement, spawning grounds for fisheries, and ground-water recharge. The values generated could be useful in examining the resource damages due to industrial solid waste facilities.

We would welcome the opportunity to discuss further with you how to coordinate our respective efforts. My understanding is that Ruth Miller is working with ORD/Las Vegas on the study you are currently initiating on industrial waste disposal facilities, and that this study will characterize the proximity of facilities to wetlands in several states (those with the best data available on location). My staff are reviewing and will provide specific technical comments on the proposed effort. I anticipate that the results of your work will support OSW's efforts to analyze and control potential risks posed by facilities in wetlands. At this time, I am designating Glen Galen (382-4654) to coordinate near-term issues on the industrial waste facility study. For wetlands issues in general, our contract is Fred Chanania, one of my Special Assistants (382-4627). I suggest we also meet in the near future to discuss longer-term coordination.

I look forward to a continuing discussion of these critical issues concerning hazardous and non-hazardous facilities

located in proximity to wetlands.

cc: Loretta Marzetti
Dave Bussard
Bruce Weddle
David Davis