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RCRA PROGRAM DIRECTIONS - PRIORITY TO ENVIRONMENTALLY
SIGNIFICANT FACILITIES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 14 1987

MEMORANDUM

SUBJECT: RCRA Program Directions for FY 1989

FROM: J. Winston Porter
Assistant Administrator

TO: Regional Administrators
Regions I-X

During the development of the FY 1988 RCRA Implementation Plan, several Regions expressed a desire to take a more integrated approach to addressing environmentally-significant facilities and activities. I agree that as we move beyond the November 1988 land disposal permitting deadline, we need to focus even more of our resources on corrective action and closure at the entire universe of environmentally-significant facilities.

To direct our resources toward these goals, we need effective ways to identify the most significant facilities. With the development over the last few years of facility management plans and multi-year strategies, we began a process to establish priorities based on the environmental significance of facilities.

In an effort to refine and apply this process more broadly, some Regions have established systems to rank all facilities and activities based on potential threats to human health and environmental significance. As we incorporate an even greater emphasis on health and environmental benefits in our decision making and priority setting, it becomes increasingly important for RCRA program managers to continue to refine and apply their screening and ranking systems to identify those facilities posing the greatest health and environmental risks.

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In FY 1989, efforts to establish priorities should be expanded to encompass the entire universe of facilities, including all treatment, storage, and disposal facilities, whether operating or closing. We do not envision this to be a highly resource-intensive effort but rather anticipate that existing data sources and Regional and State knowledge of site conditions can, to a large extent, be used to establish priorities. In addition, since a number of these priority facilities may ultimately be eligible for management under Superfund, Superfund resources also will be available to assist in the initial screening and ranking through the PA/SI process. This preliminary establishment of priorities is an integral part of the Environmental Priorities Initiative (EPI).

Once environmentally significant facilities have been identified, high priority should be placed in FY 1989 and beyond on addressing corrective action and permitting or closure/post-closure at the most significant facilities, regardless of RCRA and CERCLA authorities to address these facilities. Although the 1989 incinerator deadline will continue to be an important goal, some reallocation of resources from incinerator permitting to other environmentally-significant facilities and activities may be justified on a case-specific basis. As part of this effort to increase our focus on the most environmentally-significant facilities, the Office of Solid Waste is examining revision of the SPMS system to better reflect the level of effort and environmental benefits associated with the various targeted activities.

This memorandum is intended to help focus your initial planning activities for FY 1989. Additional guidance will be provided in the FY 1989 RCRA Implementation Plan, the FY 1989 Agency Operating Year Guidance, and through the EPI Task Force. Also, to help support these planning efforts, OSWER will be issuing guidance on the use of Section 3008(h) orders, RCRA National Priorities List listing policy, and post-closure permits as tools for instituting corrective action. Finally, as part of the EPI, Superfund resources will be used to conduct approximately 1,000 new preliminary assessments (PAs) on the highest priority sites and you will have available for priority setting purposes information on RCRA sites that are now in CERCLIS and that have received PAs and SIs. Guidance on this effort also will be provided.

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As we plan for the challenges of FY 1989, I look forward to working with you to ensure the greatest level of environmental benefits are achieved.

cc: Deputy Administrator
Regional Division Directors
Regional RCRA Branch Chiefs
Regional Enforcement Branch Chiefs
Regional Superfund Branch Chiefs