



# Environmental Guidance Regulatory Bulletin

*Office of Environmental Policy and Assistance RCRA/CERCLA Division (EH-413)  
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## **Standards for Non-municipal, Non-hazardous Waste Disposal Units Receiving Hazardous Wastes from Conditionally Exempt Small Quantity Generators (CESQGs)**

***Effective Date: January 1, 1998\****

### ***Introduction***

On July 1, 1996, the Environmental Protection Agency (EPA) issued final regulations establishing national disposal standards (40 CFR 257.5 through 257.30) applicable to non-municipal, non-hazardous waste disposal units that receive hazardous waste from conditionally exempt small quantity generators (CESQGs) (61 FR 34252). The regulations also amend 40 CFR 261.5 (Special Requirements for Hazardous Waste Generated by Conditionally Exempt Small Quantity Generators) clarifying acceptable Subtitle D management options for CESQGs.

The waste disposal units that will be most affected by this final rule include: (1) offsite commercial industrial landfills and onsite industrial landfills that co-dispose CESQG waste with industrial non-hazardous waste; and (2) construction and demolition (C&D) landfills that receive CESQG waste. Complex-wide, DOE or DOE contractors own or operate at least 20 industrial and C&D landfills that would be affected by the final regulations if such landfills receive CESQG waste.

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\* *Except 40 CFR 257.21 through 257.28, which are effective July 1, 1998, and 40 CFR 261.5(f), 261.5(g), and 271.1, which are effective January 1, 1997, but have a compliance date of January 1, 1998.*

### ***Background***

The Hazardous and Solid Waste Amendments (HSWA) of 1984, added Section 4010(c) to RCRA, requiring EPA to revise its existing RCRA Subtitle D national minimum criteria for evaluating whether solid waste management practices and facilities are conducting open dumping (i.e., 40 CFR Part 257), which is prohibited by RCRA 4005(a). The revised criteria were to specifically address solid waste management facilities that may receive hazardous household waste or hazardous waste from small quantity generators not subject to RCRA Subtitle C requirements. At a minimum, the criteria were to include ground-water monitoring requirements, location restrictions, and corrective action, as appropriate.

In response to RCRA 4010(c), EPA promulgated 40 CFR Part 258 (Criteria for Municipal Solid Waste Landfills) on October 9, 1991 (56 FR 51016). As the title of 40 CFR Part 258 implies, the criteria established therein apply only to municipal solid waste landfills (MSWLFs), which EPA believed to be the primary source of contamination caused by legally unregulated land disposal of hazardous waste. MSWLFs are defined as publicly or privately owned, new, existing, or lateral expansions of landfills that receive household waste (including hazardous household waste), and that may also receive other types of RCRA Subtitle D wastes, such as commercial solid waste, non-hazardous sludge, and industrial solid waste (including exempt hazardous waste from CESQGs).

Minor modifications were made to the definitions in 40 CFR Part 257 at the time Part 258 was promulgated to reflect the new limitation of its coverage to non-municipal non-hazardous solid waste landfills. Otherwise, it remained unchanged.

Revisions to Part 257 to address concerns about disposal of CESQG hazardous waste in such non-municipal non-hazardous solid waste landfills were delayed because EPA had little information about the potential or actual impacts that these types of facilities may have on human health and the environment. Hence, EPA's response to the statutory mandate in RCRA 4010(c) did not extend to all Subtitle D landfills that might receive CESQG hazardous waste. Consequently, the Sierra Club sued, and in 1993, the U.S. District Court for the District of Columbia ordered EPA to promulgate criteria applicable to non-municipal non-hazardous solid waste landfills that might receive CESQG hazardous waste [*Sierra Club v. EPA*, 992 F.2d. 337 (D.C. Cir. 1993)]. As a result of the lawsuit, EPA and the Sierra Club agreed on a schedule requiring that the EPA Administrator sign a proposal by May 15, 1995, and a final rule by July 1, 1996. EPA's final rule is the subject of this Regulatory Bulletin.

### ***Provisions of the Final Rule***

**Statutory Authority.** The final rule is promulgated under the authority of Sections 1008, 2002 (general rulemaking authority), 3001(d)(4), 4004, and 4010 (c) of RCRA, as amended. Section 3001(d)(4) in RCRA Subtitle C authorizes EPA to promulgate standards for generators who do not generate more than 100 kg per month of hazardous waste. Section 4010(c) in RCRA Subtitle D directs EPA to revise criteria promulgated under Sections 1008 and 4004 for facilities that may receive hazardous household waste or small quantity generator hazardous waste.

**Summary of Final Rule.** The final regulations published in the *Federal Register* on July 1, 1996 (61 FR 34252) consist of a RCRA Subtitle D component (40 CFR 257.5 through 40 CFR 257.30) applicable to non-municipal, non-hazardous waste land disposal units that receive hazardous waste from CESQGs, and a RCRA Subtitle C component (40 CFR 261.5) applicable to CESQGs. In the Subtitle D component, minimum national standards are specified that restrict the location of non-municipal non-hazardous waste land disposal units, and that impose ground-water monitoring requirements, corrective action standards, and recordkeeping requirements on such units. The location

restrictions will be effective 18 months after publication of the final rule. The ground-water monitoring and corrective action requirements will be effective 24 months after publication of the final rule.

The final Subtitle D regulations, which are described below in more detail, are nearly identical to the proposed regulations published in the *Federal Register* on June 12, 1995 (60 FR 30964). However, where significant variations occur, the nature of the differences are reported as part of the description below.

In the Subtitle C component, the final regulations (40 CFR 261.5(f)(3) and (g)(3)) expand the allowable offsite management options for CESQG hazardous waste to include placement in a RCRA Subtitle D land disposal facility permitted, licensed, or registered by a State to manage non-municipal, non-hazardous waste in a manner consistent with the requirements of 40 CFR 257.5 through 257.30.

## **SUBTITLE D PROVISIONS**

### **Applicability — 40 CFR 257.5(a)**

Any non-municipal non-hazardous waste disposal unit that is receiving CESQG hazardous waste as of January 1, 1998, must be in compliance with the requirements in 40 CFR 257.7 through 257.13 and 257.30 by January 1, 1998, and the requirements in 40 CFR 257.21 through 257.28 by July 1, 1998. Any such unit that first receives CESQG hazardous waste after January 1, 1998, must be in compliance with 40 CFR 257.7 through 257.30 prior to the receipt of CESQG hazardous waste.

### **Location Restrictions — 40 CFR 257.7 through 257.13.**

In 1995, EPA proposed standards for the location of non-municipal non-hazardous waste land disposal units that receive CESQG hazardous waste that addressed airport safety, fault areas, seismic impact zones, unstable areas, floodplains, and wetlands. In response to public comments on the proposal, however, the Agency finalized the following location restrictions related only to floodplains and wetlands.

*Floodplains.* Owners or operators of new units, existing units, and lateral expansions located in 100-year floodplains must demonstrate that the unit will not restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain, or result in washout of solid waste so as to pose a hazard to human health and the environment. (40 CFR 257.8)

*Wetlands.* New units and lateral expansions shall not be located in a wetland unless specified demonstrations can be made by the owner or operator. The demonstrations relate to protection of State water quality standards and protection of the wetland consistent with EPA's objective of achieving no net loss of the nation's wetlands. (40 CFR 257.9)

### **Ground-Water Monitoring Requirements — 40 CFR 257.22 through 257.25.**

Unless the Director of an approved State specifies an alternative schedule, owners and operators of facilities must comply with the ground-water monitoring requirements identified in 40 CFR 257.5(a) according to the following schedule:

- Ⓒ Existing units and lateral expansions must be in compliance with the ground-water monitoring requirements by July 1, 1998.
- Ⓒ New units must be in compliance with the ground-water monitoring requirements before waste can be placed in the unit.

*Length of Monitoring Period.* Owners or operators of non-municipal, non-hazardous waste land disposal facilities that receive CESQG waste must conduct ground-water monitoring during the active lives of their facilities plus 30 years following the end of their facilities' active lives.

However, an approved State may:

- Ⓒ Decrease the 30 year period (for example, if the facility owner or operator demonstrates that no adverse changes in ground-water quality have been detected for some period less than 30 years); or
- Ⓒ Suspend ground-water monitoring requirements in hydrogeologic settings that preclude migration of hazardous constituents from the unit to the ground-water. (40 CFR 257.21(e))

*Ground-Water Monitoring Systems.* The ground-water monitoring system must consist of a sufficient number of wells, at appropriate locations

and depths, to yield ground-water samples from the uppermost aquifer. The samples must represent the quality of:

- Ⓒ Background ground-water that has not been affected by leakage from a unit; and
- Ⓒ Ground-water passing the relevant point of compliance specified by an approved State, or at the waste management unit boundary in an unapproved State. (40 CFR 257.22(a)(1) and (2))

The number, location, and depths of the monitoring systems shall be:

- Ⓒ Determined on site-specific technical information through characterization of the aquifer and geologic conditions; and
- Ⓒ Either approved by the Director of an approved State or certified by a qualified ground-water scientist with subsequent notification to the State (40 CFR 257.22(d)(1) and (2))

*Ground-Water Sampling and Analysis Requirements.* The ground-water monitoring program must include procedures and techniques which conform with 40 CFR 257.23(a)(1) through (5). Further, owners or operators must document their programs and notify the State Director. More details on sample collection and data analysis are provided in 40 CFR 257.23.

*Detection Monitoring Program.* The purpose of detection monitoring is to alert the facility owner or operator when migration of hazardous constituents may be occurring. At least semi-annual monitoring is required during detection monitoring, unless an approved State specifies an alternative frequency. To fulfill the requirements of the detection-monitoring program unit owners or operators must, at a minimum, test the ground-water for the monitoring parameters listed in Appendix I of 40 CFR Part 258. The Director of an approved State may:

- Ⓒ Delete any of the Appendix I parameters if it can be shown that the removed constituents are not reasonably expected to be contained in or derived from the waste contained in the unit. (40 CFR 257.24(a)(1))
- Ⓒ Establish an alternative list of constituents for a unit, in lieu of some or all Appendix I parameters if the alternative constituents provide a reliable indication of releases from the unit to the ground-water. (40 CFR 257.24(a)(2))

*Assessment Monitoring Program.* If detection monitoring indicates a statistically significant increase over background for one or more constituents, then assessment monitoring must be conducted. The purpose of assessment monitoring would be to identify specific constituents of concern for which corrective measures might be required. (40 CFR 257.25)

#### **Corrective Action Requirements — 40 CFR 257.26 through 257.28.**

If assessment monitoring confirms a statistically significant increase in the level of constituents of concern in ground-water, then assessment of corrective measures must be completed (40 CFR 257.26). The facility owner or operator must present and discuss the results of the corrective measures assessment in a public meeting with interested and affected parties. (40 CFR 257.26(d))

Based on the corrective measures assessment and the public meeting, the facility owner or operator must select a remedy in accordance with certain criteria listed under 40 CFR 257.27(b)(1) through (4); notify the State; and record a description of the remedy. The selected remedy must include a schedule for initiating and completing remedial activities. 40 CFR 257.27(d)).

An approved State has the authority to determine that remediation is unnecessary if the facility owner or operator demonstrates that:

- C No reduction in risk to actual or potential receptors would occur since additional contamination from another source is the major risk contributor; or
- C The ground-water is not currently reasonably expected to be a drinking water source or is not hydraulically connected with waters to which migration might occur; or
- C The remediation is technically impracticable; or
- C The remediation results in unacceptable cross-media impacts. (40 CFR 257.27(e)(1) through (4))

Implementation requirements for the corrective measures program include provisions for monitoring, determinations of technical impracticability, and changes to the remedial method. (40 CFR 257.28)

#### **Recordkeeping Requirements — 40 CFR 257.30.**

Unit owners or operators must record and retain various pieces of information in an operating record which must be kept at the facility or at an alternative location approved by an authorized State. Such information includes: any location restriction documentation; and any certification, finding, monitoring, testing, or analytical data required as part of complying with ground-water monitoring or corrective action requirements.

#### **ADDITIONAL MANAGEMENT OPTIONS FOR CESQGS**

Prior to EPA's final rule, allowable management options for CESQG hazardous waste included:

- On-site treatment or disposal; or
- Off-site treatment, storage, or disposal in a waste management facility that is:
  - R A permitted hazardous waste management facility under RCRA Subtitle C;
  - R A hazardous waste management facility in interim status under RCRA Subtitle C;
  - R A hazardous waste management facility authorized by a State with an approved hazardous waste management program;
  - R A facility that legitimately reuses, recycles or reclaims hazardous waste;
  - R A facility permitted, licensed, or registered by a State to manage municipal solid waste and subject to 40 CFR Part 258 if it is a municipal solid waste landfill (MSWLF); or
  - R For CESQG waste that is universal waste (i.e., batteries, pesticides or thermostats), a universal waste handler or destination facility subject to the requirements of 40 CFR Part 273 (Standards for Universal Waste Management).

The final rule modifies 40 CFR 261.5(f)(3) (applicable to acutely hazardous waste) and 40 CFR 261.5(g)(3) (applicable to hazardous waste that is not acutely hazardous) by adding to the above another management option. CESQGs are now allowed to manage their hazardous waste in non-municipal, non-hazardous waste disposal units that are subject to the standards established in 40 CFR 257.5 through 257.30.

## IMPLEMENTATION AND ENFORCEMENT

The mechanism for implementation and enforcement of federal RCRA regulations depends on whether they are promulgated pursuant to RCRA Subtitle D or Subtitle C. The final rule described by this Regulatory Bulletin contains both a Subtitle D and a Subtitle C component. The new standards established in 40 CFR 257.5 through 257.30 (regulation of non-municipal non-hazardous land disposal units receiving CESQG hazardous wastes) fall under Subtitle D. The amendments to 40 CFR 261.5 (regulation of CESQGs of hazardous waste) fall under Subtitle C. Implementation and enforcement of each component is discussed below.

### **New Standards Established in 40 CFR 257.5 through 257.30 (Subtitle D Component)**

*State Implementation.* States have primary responsibility for implementing and enforcing the RCRA Subtitle D non-hazardous waste regulatory program. Notwithstanding, RCRA Subtitle D (section 4005) directs EPA to promulgate national minimum standards for non-hazardous solid waste management facilities that may receive hazardous household waste or hazardous waste from small quantity generators not subject to RCRA Subtitle C requirements. Such facilities include MSWLFs and non-municipal non-hazardous solid waste landfills. RCRA Subtitle D further requires that States adopt and implement permitting programs, or other systems of prior approval and conditions, to ensure compliance by non-hazardous waste management facilities with the basic goals of the EPA-established national minimum standards. Finally, EPA is assigned responsibility for evaluating the adequacy of State programs.

As previously explained (p. 1 above), EPA adopted minimum national standards applicable to MSWLFs in 1991 (40 CFR 258). In response, many States adopted solid waste landfill permitting programs to implement these standards, and EPA made determinations about the adequacy of such programs. Although not required to do so, some States wrote their solid waste landfill programs broadly enough to cover not only MSWLFs, but also non-municipal non-hazardous waste disposal units that might receive CESQG hazardous waste. Other States adopted provisions limiting disposal of CESQG hazardous waste either to placement in an MSWLF

covered by their EPA-approved MSWLF programs, or to placement in hazardous waste facilities subject to the requirements of RCRA Subtitle C.

Now, EPA has adopted 40 CFR 257.5 through 257.30 establishing minimum national standards applicable to non-municipal non-hazardous solid waste landfills that may receive CESQG hazardous wastes. As was the case when EPA promulgated the minimum national standards applicable to MSWLFs (40 CFR part 258), States must establish and obtain EPA's approval for permitting programs to ensure compliance with the basic goals of the new standards. In some States, accomplishing this will necessitate development of entirely new permitting programs. However, in States that previously received EPA's approval for MSWLF programs covering non-municipal non-hazardous waste disposal units that might receive CESQG hazardous waste, EPA has determined that new programs are not necessary (see 61 FR 34252, 34264, col. 3). Such States will only need to submit documentation to EPA demonstrating that non-municipal non-hazardous waste disposal units are subject to the existing, approved MSWLF programs.

New programs are also not necessary in States that previously adopted (or now choose to adopt) provisions limiting disposal of CESQG hazardous waste to either MSWLFs subject to an existing EPA-approved MSWLF program, or hazardous waste disposal facilities subject to RCRA Subtitle C. In such States, EPA believes that the prohibition on disposal of CESQG hazardous waste in non-municipal non-hazardous waste landfills adequately assures fulfillment of the basic goals of the minimum national standards in 40 CFR 257.5 through 257.30, obviating the need for permitting.

*Owner/Operator Responsibilities.* The minimum national standards in 40 CFR 257.5 through 257.30 are self-implementing. Therefore, unless the regulations specifically provide otherwise, by January 1, 1998 (the effective date of the final rule), owners and operators of non-municipal, non-hazardous waste disposal units that are receiving CESQG wastes must comply with such federal standards. If an affected unit is located in a State having an EPA-approved implementing program, however, the owner/operator must comply with the approved State standards. Such standards may be different from the federal standards because States

are allowed the flexibility to consider local conditions in setting appropriate alternative standards that still achieve compliance with the basic goals of the minimum national standards.

- C Personnel responsible for operation of any DOE-owned non-municipal non-hazardous waste disposal units that may receive CESQG hazardous wastes should determine whether such units are located in a State with an applicable, approved State permitting program.
- C If the unit is not located in a State with an approved program, timely compliance with the minimum national standards in 40 CFR 257.5 through 257.30 should be planned. If the unit is located in a State where a State program has been or is likely to be approved, compliance with pertinent State program requirements should be planned.

*Enforcement.*

- C In all States, regardless of whether or not the State has adopted an adequate permitting program applicable to non-municipal non-hazardous land disposal units that may receive CESQG hazardous wastes, EPA has the following enforcement authorities:
  - (1) authority to take action, if warranted, to address situations posing an imminent and substantial endangerment to human health or the environment (RCRA 7003); and
  - (2) authority to initiate a response to a release, or substantial treat of release, of a hazardous substance, pollutant, or contaminant that may present an imminent and substantial danger to the public health and welfare (Comprehensive Environmental Response, Compensation and Liability Act, Section 104).
- C Also in all States, regardless of whether or not the State has adopted an adequate permitting program, citizens may bring suit in federal court seeking enforcement of the federal minimum standards contained in 40 CFR 257.5 through 257.30 (RCRA 7002).
- C In States that do not adopt adequate permitting programs applicable to non-municipal non-hazardous land disposal units that may receive

CESQG hazardous waste, EPA has authority to inspect facilities for compliance with the federal minimum standards contained in 40 CFR 257.5 through 257.30, and bring enforcement actions under RCRA 3008 (Federal Enforcement), if warranted.

- C In States that do adopt adequate permitting programs applicable to non-municipal non-hazardous land disposal units that may receive CESQG hazardous waste, the State has authority to enforce its approved program. In such States, EPA has no authority to enforce the federal minimum standards contained in 40 CFR 257.5 through 257.30.

**Amendments to 40 CFR 261.5 (Subtitle C Component)**

*State Implementation.* Under RCRA Subtitle C, EPA has primary responsibility for regulation of hazardous waste and is required to adopt specified federal hazardous waste regulatory programs. EPA may authorize a qualified State to administer and enforce the federal hazardous waste programs within the State's boundaries (see 40 CFR 271). If a State has been granted final authorization for the portions of the federal RCRA Subtitle C hazardous waste program that existed prior to HSWA, the State administers that authorized program (referred to as Subtitle C base authorization) entirely in lieu of the federal program. Non-HSWA federal requirements, whether more stringent or not, do not take effect, and are not enforced in a State with Subtitle C base authorization until the State adopts such requirements as State law.

States with Subtitle C base authorization may also be authorized by EPA to implement and enforce federal hazardous waste programs mandated by HSWA (e.g., land disposal restrictions and corrective action). However, an authorized HSWA program is not administered by the State entirely in lieu of the federal program. Instead, new federal HSWA requirements that are more stringent than existing federal requirements take effect and are implemented by EPA in all States, unless and until States become authorized to implement them.

The revisions to 40 CFR 261.5 respond to a RCRA provision added by HSWA. Also, EPA considers the amended regulations to be more stringent than existing regulations. As such, the revised 40 CFR

261.5 will be implemented by EPA in all States, unless and until States become authorized to implement them.

- C Notwithstanding, a number of States have more stringent requirements than the final rule in place relative to the disposal of waste generated by CESQGs (for example, by not allowing permitted MSWLFs to accept CESQG hazardous waste). In these States, the more stringent State requirements would continue to apply.
- C If EPA authorizes a State to implement 40 CFR 261.5 based on an application filed pursuant to 40 CFR Part 271 (Requirements for Authorization of State Hazardous Waste Programs), the State requirements will be effective in the authorized State in lieu of the federal regulations. Any State otherwise authorized to implement RCRA Subtitle C that does not have existing CESQG waste management requirements that are more stringent than the final 40 CFR 261.5 is required to submit an authorization revision application by the deadline specified in 40 CFR 271.21(e).

*Enforcement.* The RCRA Subtitle C provisions of the final rule will be enforced in authorized and unauthorized States in the same manner as existing Subtitle C regulations.

- C EPA is responsible for enforcement in unauthorized States. In authorized States, the States have primary responsibility, but EPA retains enforcement oversight.
- C Citizen suits may be brought to seek enforcement of the federal regulations in unauthorized States, and to seek enforcement of the State regulations in authorized States, since in authorized States, these operate in lieu of federal regulations.
- C Also, EPA's authorities under RCRA 7003 and CERCLA 104 are the same regarding the Subtitle C provisions of the final rule as was described above in the context of enforcing the final rule's Subtitle D provisions.

## GLOSSARY

Acute Hazardous Waste. Waste, which has been found to be fatal to humans in low doses or, in the absence of data on human toxicity, has been shown in studies to have an oral LD 50 toxicity (rat) of less than 2 milligrams per liter, or a dermal LD 50 toxicity (rabbit) of less than 200 milligrams per kilogram, or is otherwise capable of causing or significantly contributing to an increase in serious irreversible, or incapacitating reversible, illness.

Conditionally Exempt Small Quantity Generator. A generator of hazardous waste that generates no more than 100 kilograms of hazardous waste in a calendar month (40 CFR 261.5(a)). A CESQG's hazardous wastes are not subject to regulation under RCRA Subtitle C, unless: (1) the amount of hazardous waste generated in a month exceeds 100 kilograms; (2) acutely hazardous waste is generated that exceeds 1 kilogram in a month; or (3) waste generated by cleaning up a spill of acutely hazardous waste exceeds 100 kilograms in a month (40 CFR 261.5(e)). For additional information, see RCRA Information Briefs EH-231-034/0593, *Exclusions and Exemptions from RCRA Hazardous Waste Regulation* (May 1993) and EH-231-055/1194, *Hazardous Waste Generator Requirements* (November 1994).

Floodplain. The lowland and relatively flat areas adjoining inland and coastal waters, including flood-prone areas of offshore islands, that are inundated by the "100-year flood" (that is, a flood that has a 1-percent chance of recurring in any given year or a flood of a magnitude equaled or exceeded once in 100 years on the average over a significantly long period).

Wetlands. Those areas that are inundated or saturated by surface or ground-water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

## REFERENCE TABLE

The following table is intended to provide a quick reference to the key components of the rule, as presented in this Regulatory Bulletin.

**Table. Quick Reference**

<b>Keyword</b>	<b>Citation (40 CFR)</b>	<b>Content</b>
Location Restrictions	257.7-257.13	<u>Floodplains</u> : new units, existing units, and lateral expansions are only allowed if the owner or operator makes certain no-impact demonstrations.  <u>Wetlands</u> : new units and lateral expansions are not allowed unless the owner or operator makes certain demonstrations relative to the protection of water quality and the wetland.
Ground-Water Monitoring	257.22-257.25	<u>Detection monitoring</u> : this first monitoring phase tests for certain parameters.  <u>Assessment monitoring</u> : this second monitoring phase is triggered if detection monitoring has indicated an increase over background for one or more constituents.
Corrective Action	257.26-257.28	If assessment monitoring confirms a significant increase in the levels of constituents of concern in ground-water the owner or operator has to conduct a corrective measures assessment (which is to be shared in a public meeting); select a remedy (including a remediation schedule); and meet notification and implementation requirements.
Recordkeeping	257.30	Owners or operators have to record and retain various pieces of information in an operating record.
Special Provisions for Hazardous Waste Generated by CESQGs	261.5	CESQGs are allowed to manage their hazardous waste in non-municipal, non-hazardous waste disposal units that are subject to the standards established in 40 CFR 257.5 through 257.30.

*Questions of policy or questions requiring policy decisions will not be dealt with in EH-413 Regulatory Bulletins unless that policy has already been established through appropriate documentation. Please refer any questions concerning the subject matter covered in this Regulatory Bulletin to:*

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