MEMORANDUM

SUBJECT: Guidance on the Conduct of RCRA Facility Assessments at POTWs

FROM: James R. Elder, Director
Office of Water Enforcement and Permits (EN-335)

TO: Water Management Division Directors
Regions I-X

Attached is a copy of our final guidance document for conducting RCRA facility assessments at POTWs. This document applies to POTWs that receive hazardous waste by truck, rail, or dedicated pipe. The document will assist you in implementing the RCRA corrective action requirements at POTWs.

The attached guidance should be used in conjunction with the "Guidance for Implementing RCRA Permit-by-Rule Requirements at POTWS" that I mailed to you on July 21, 1987. The previous guidance explains the procedures for issuing a permit-by-rule to a POTW. Corrective action is a major requirement of the permit-by-rule, and today's guidance will assist you in completing the first phase of corrective action - the RCRA Facility Assessment.

For those Regions with POTWs that receive hazardous waste by truck, rail, or dedicated pipe, (to date we have identified 26 such POTWs), we anticipate that the permits-by-rule will be issued during FY88. The major task of these permits is preparing a schedule for corrective action. The attached guidance will assist you in preparing these schedules.

For more information about the guidance, have your staff contact Paul Connor of the Permits Division at FTS-475-7718. I hope you find the guidance document useful.

Attachment

cc: Permits Branch Chiefs, Regions I-X
Hazardous Waste Coordinators, Regions I-X
EPA

Guidance Manual for Conducting RCRA Facility Assessments at Publicly Owned Treatment Works
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