



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20450

OCT 31 1980

FIG-80-1

MEMORANDUM

SUBJECT: Establishment of RCRA "Program Implementation Guidance System (PIGS)"

FROM: Steffen W. Plehn *Steffen W. Plehn*
Deputy Assistant Administrator
for Solid Waste (W-562)

R. Sarah Compton *R. Sarah Compton*
Deputy Assistant Administrator
for Water Enforcement (EN-336)

James A. Rogers *James A. Rogers*
Associate General Counsel, Water and Solid Waste
Division (A-131)

TO: See "Distribution" Below

PURPOSE: To aid in properly implementing the Federal and State hazardous waste management programs under Subtitle C of the Resource Conservation and Recovery Act, this memorandum establishes a system to provide directives regarding program implementation.

DISCUSSION: The RCRA regulations promulgated on May 19, 1980, to control hazardous wastes are one of the most comprehensive sets of regulations published by EPA. As a result there is a need for some means of documenting and disseminating information on implementation of these regulations and the national program they put into effect. The "Program Implementation Guidance System (PIGS)" is intended to provide this means. Program Implementation Guidance Memorandum will be issued to answer questions and provide direction regarding the implementation of the Federal program and to aid in management of the State programs. For example, PIGs may set forth internal EPA reporting requirements and respond to questions regarding program implementation at Headquarters and in the Regional Offices. A prime objective of the PIGS will be to provide national consistency in implementing Subtitle C of RCRA.

This system differs from the recently established "Regulation Interpretation Memorandum System" (RIMS) which will consist of interpretive memoranda to explain how the Federal hazardous waste regulations will apply in particular situations. RIMS will interpret the regulations in response to questions whose answers require a fairly sophisticated understanding of the regulations, and will be published in the Federal Register. A notice explaining the RIMS was published in the Federal Register on August 19, 1980 (45 FR 55396).

IMPLEMENTATION: As national manager of the Federal program to control hazardous waste, the Deputy Assistant Administrator for Solid Waste will manage the PIGS.

PIGS will be issued as memoranda in standard format and will be numbered to indicate the fiscal year and the sequential number of each issuance. For example, as the first PIG to be issued in FY 1980, this memorandum establishing the PIGS is numbered PIG-80-1.

PIGS will be developed by the Office of Solid Waste or the Office of Water Enforcement. All PIGs will be signed by both the Deputy Assistant Administrator for Solid Waste and the Deputy Assistant Administrator for Water Enforcement. Prior to issuance, the concurrence of the Associate General Counsel for Water and Solid Waste will be obtained. Thus, regardless of originating office, each PIG will represent the joint guidance of these three offices. Within the Office of Solid Waste, all PIGs will be reviewed by OSW Senior Staff. As appropriate, the Office of Water Enforcement will identify and sequentially number selected PIGs for inclusion in the Consolidated Permits Policy Guidance System.

Following appropriate signature and concurrences, PIGs will be distributed by the State Programs Branch, Office of Solid Waste, as indicated by "Distribution", below.

Distribution:

Regional Offices - Regional Administrators
Air and Hazardous Materials Division Directors
(Regions I, III - X)
Water Division Director (Region II)
Regional Counsels
Enforcement Division Directors

Headquarters - Deputy Assistant Administrator for Solid Waste
Deputy Assistant Administrator for Water
Enforcement
Associate General Counsel, Water and Solid
Waste Division
Director, Enforcement Division
Director, Permits Division
Senior Staff, Office of Solid Waste

States - Directors, State Solid Waste Agencies
(See attached list)

Attachment

cc: Branch Chiefs, Office of Solid Waste
Permits Branch Chiefs, Region I-X



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20450

OCT 31980

FIG-80-1

MEMORANDUM

SUBJECT: Establishment of RCRA "Program Implementation Guidance System (PIGS)"

FROM: Steffen W. Plehn *Steffen W. Plehn*
Deputy Assistant Administrator
for Solid Waste (W-562)

R. Sarah Compton *R. Sarah Compton*
Deputy Assistant Administrator
for Water Enforcement (EN-336)

James A. Rogers *James A. Rogers*
Associate General Counsel, Water and Solid Waste
Division (A-131)

TO: See "Distribution" Below

PURPOSE: To aid in properly implementing the Federal and State hazardous waste management programs under Subtitle C of the Resource Conservation and Recovery Act, this memorandum establishes a system to provide directives regarding program implementation.

DISCUSSION: The RCRA regulations promulgated on May 19, 1980, to control hazardous wastes are one of the most comprehensive sets of regulations published by EPA. As a result there is a need for some means of documenting and disseminating information on implementation of these regulations and the national program they put into effect. The "Program Implementation Guidance System (PIGS)" is intended to provide this means. Program Implementation Guidance Memorandum will be issued to answer questions and provide direction regarding the implementation of the Federal program and to aid in management of the State programs. For example, PIGs may set forth internal EPA reporting requirements and respond to questions regarding program implementation at Headquarters and in the Regional Offices. A prime objective of the PIGS will be to provide national consistency in implementing Subtitle C of RCRA.

This system differs from the recently established "Regulation Interpretation Memorandum System" (RIMS) which will consist of interpretive memoranda to explain how the Federal hazardous waste regulations will apply in particular situations. RIMS will interpret the regulations in response to questions whose answers require a fairly sophisticated understanding of the regulations, and will be published in the Federal Register. A notice explaining the RIMS was published in the Federal Register on August 19, 1980 (45 FR 55396).

STATE SOLID WASTE AGENCIES
ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF SOLID WASTE
JULY 1980

Alabama

Alfred S. Chipley, Director
Division of Solid Waste and
Vector Control
Department of Public Health
Montgomery, Alabama 36130
CML (205) 832-6728

Alaska

Thomas R. Hanna
Air and Solid Waste Management
Dept. of Environmental
Conservation
Pouch O
Juneau, Alaska 99811
Seattle FTS Operator 399-0150
CML (907) 465-2635

American Samoa

Randy Morris, Deputy Director
Department of Public Works
Pago Pago, American Samoa 96799
Overseas Operator
(Commercial Call 633-4141)

Pati Faiai, Executive Secretary
Environmental Quality Commission
American Samoa Government
Pago Pago, American Samoa 96799
Overseas Operator
(Commercial Call 633-4116)

Abe Malae, Special Assistant
M & O Construction Division
Department of Public Works
Pago Pago, American Samoa 96799
Overseas Operator
(Commercial Call 688-9167)

Arizona

R. Bruce Scott, Assistant Director
Department of Health Services
1740 West Adams Street
Phoenix, Arizona 85007
FTS 8-765-1130
CML (602) 255-1130

Arkansas

H.J. Parr, Chief
Solid Waste Management Division
Department of Pollution Control
and Ecology
P.O. Box 9583
8001 National Drive
Little Rock, Arkansas 72219
CML (501) 371-1701

Alford Drinkwater
Solid Waste Program
Department of Energy
3000 Kavanaugh
Little Rock, Arkansas 72205
CML (501) 371-2234

California

Dr. Harvey Collins, Chief
Department of Health Services
Hazardous Material Management Section
744 P Street
Sacramento, California 95814
FTS 8-552-2337
CML (916) 322-2337

Chairman
State Solid Waste Management Board
1020 9th Street, Suite 300
Sacramento, California 95814
FTS 8-552-3330
CML (916) 322-3330

Colorado

Mr. Orville Stoddard
Department of Health
4210 East Eleventh Avenue
Denver, Colorado 80220
CML (303) 320-8333

Commonwealth of North Mariana Islands

Nachsa Siren, Executive Officer
Environmental Protection Board
c/o Department of Health Services
Trust Territory of the Pacific Islands
Saipan, Mariana Islands 96950
Overseas Operator
(Commercial Call 6984 or 6114)

Carl Goldstein
Division of Environmental Quality
Department of Public Health
and Environmental Services
Commonwealth of the North
Mariana Islands
Saipan, Mariana Islands 96950
Cable address: GOV. NMI Saipan

Connecticut

Charles Kurker, Director
Solid Waste Management Unit
Department of Environmental Protection
State Office Building
165 Capitol Avenue
Hartford, Connecticut 06115
FTS 8-641-3672
CML (203) 566-3672

Stephen Hitchcock, Director
Hazardous Materials Management Unit
Department of Environmental Protection
State Office Building
165 Capitol Avenue
Hartford, Connecticut 06115
FTS 8-641-5148
CML (203) 566-5148

Connecticut (cont.)

John J. Housman, Chief
Hazardous Materials Management Unit
Department of Environmental Protection
State Office Building
165 Capitol Avenue
Hartford, Connecticut 06115
FTS 8-641-5712
CML (203) 566-5712

Russell L. Brennenan, President
Connecticut Resources Recovery Authority
179 Allyn Street, Suite 603
Professional Building
Hartford, Connecticut 06103
CML (203) 549-6390

Delaware

Kenneth R. Weiss, Acting Chief
Solid Waste Management
Department of Natural Resources
and Environmental Control
Edward Tatral Building
Dover, Delaware 19901
CML (302) 736-4764

District of Columbia

Malcom Hope
Department of Environmental Services
415 12th Street, N.W.
Washington, D.C. 20004
FTS 8-727 5701
CML (202) 727-5701

Florida

Robert McVeti
Solid Waste Management Program
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301
CML (904) 488-0300

Georgia

Moses N. McCall, III, Chief
Land Protection Branch
Environmental Protection Division
Department of Natural Resources
Room 822
270 Washington Street, S.W.
Atlanta, Georgia 30334
CML (404) 656-2833

Guam

James Branch, Deputy Administrator
EPA, Government of Guam
P.O. Box 2999
Agana, Guam 96910
Overseas Operator
(Commercial Call 646-8863)

Hawaii

Ralph Yukamoto
Environmental Health Division
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801
California FTS Operator 8-556-0220
CML (808) 548-6410

Melvin Koizumi, Deputy Director
Environmental Health Division
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801
California FTS Operator 8-556-0220
CML (808) 548-4139

Idaho

Howard Burkhardt, Supervisor
Solid/Hazardous Materials Section
Department of Health and Welfare
State House
Boise, Idaho 83720
CML (208) 334-4108

Illinois

John S. Moore, Manager
Division of Land and Noise
Pollution Control
Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706
CML (217) 782-9800

Indiana

David Lamm, Chief
Solid Waste Management Section
Division of Sanitary Engineering
State Board of Health
1330 West Michigan Street
Indianapolis, Indiana 46206
FTS 8-336-0176
CML (317) 633-0176

Iowa

Charles C. Miller, Director
Air and Land Quality Division
Department of Environmental Quality
Henry A. Wallace Building
900 East Grand Street
Des Moines, Iowa 50319
FTS 8-341-8853
CML (515) 281-8853

Kansas

Charles H. Linn, Chief
Solid Waste Management Section
Department of Health and Environment
Topeka, Kansas 66620
CML (913) 862-9360, Ext. 297

Kentucky

Roger Blair, Director
Division of Hazardous Material
and Waste Management
Department for Natural Resources and
Environmental Protection
1121 Louisville Rd.
Pineville Plaza
Frankfort, Kentucky 40601
FTS 8-351-6716
CML (502) 564-6716

Louisiana

James Hutchinson, Deputy Secretary
 Department of Natural Resources
 P.O. Box 44396
 Baton Rouge, Louisiana 70804
 CML (504) 342-4506

Maine

Robert Denkowitz
 Coordinator for Hazardous Waste Mgmt.
 Bureau of Oil and Hazardous Matls. Control
 Department of Environmental Protection
 Hospital Street-Ray Building
 Augusta, Maine 04333
 (207) 289-2591

Ron Howes, Chief
 Division of Solid Waste Management Control
 Bureau of Land Quality
 Department of Environmental Protection
 State House-Station 17
 Augusta, Maine 04333
 CML (207) 289-2111

Maryland

Ernest C. Rebeck, Director
 Water and Waste Management Program
 Water Resources Administration
 Department of Natural Resources
 Tawes State Office Building
 Annapolis, Maryland 21401
 CML (301) 269-3875

Ronald Nelson, Administrator
 Community Health Programs
 Environmental Health Administration
 Department of Health and Mental Hygiene
 201 West Preston Street
 Baltimore, Maryland 21201
 CML (301) 383-3123

Massachusetts

William Gaughan, Director
 Bureau of Solid Waste Disposal
 Department of Environmental Management
 Room 1905
 Leverett Saltonstall Building
 100 Cambridge Street
 Boston, Massachusetts 02202
 CML (617) 727-4293

Massachusetts (cont.)

Solid Waste Regulatory:
 Vartkas K. Karaian, Chief
 Solid Waste Branch
 Division of Hazardous Wastes
 Department of Environmental Quality
 Engineering
 600 Washington Street, Room 320
 Boston, Massachusetts 02111
 CML (617) 727-2658

Hazardous Waste Regulatory:
 Glenn Gilmore, Chief
 Hazardous Waste Section
 Division of Hazardous Waste
 Department of Environmental Quality
 Engineering
 600 Washington Street
 Boston, Massachusetts 02111
 CML (617) 727-5431

Michigan - Dept. of Natural Resources

O.J. Scherschligt, Deputy Director
 Environmental Protection Bureau
 Department of Natural Resources
 Stevens T. Mason Building
 P.O. Box 30028
 Lansing, Michigan 48909
 CML (517) 373-2682

Fred Kellow, Division Chief
 Resource Recovery Division
 Department of Natural Resources
 General Office Building
 Secondary Complex
 7150 Harris Drive
 Lansing, Michigan 48909
 CML (517) 322-1315

Hazardous Waste Liquid:
 David Dennis, Chief
 Oil and Hazardous Materials Control
 Section
 Water Quality Division
 Department of Natural Resources
 Stevens T. Mason Building
 P.O. Box 30028
 Lansing, Michigan 48909
 CML (517) 373-2794

Michigan (cont.)

Hazardous Waste, Toxic or
Critical Materials:
Gary Guenther, Director
Environmental Services Division
Department of Natural Resources
Stevens T. Mason Building
P.O. Box 30028
Lansing, Michigan 48909
CML (517) 373-3560

Michigan - Department of Public Health

John L. Hesse, Chief
Chemicals and Health Center
Michigan Department of Public Health
P.O. Box 30035
Lansing, Michigan 48909
CML (517) 373-8050

Minnesota

Dale L. Wikre, Acting Chief
Division of Solid Waste Management
Pollution Control Agency
1843 West County Road C
Roseville, Minnesota 55113
CML (612) 297-2734

Mississippi

Jack M. McMillan, Director
Division of Solid Waste Management
and Vector Control
State Board of Health
P.O. Box 1700
Jackson, Mississippi 39205
CML (601) 982-6317

Missouri

Robert M. Robinson, Director
Solid Waste Management Program
Department of Natural Resources
State Office Building
P.O. Box 1368
Jefferson City, Missouri 65102
CML (314) 751-3241

Montana

Duane L. Robertson, Chief
Solid Waste Management Bureau
Department of Health and Environmental
Sciences
1400 11th Avenue, Suite A
Helena, Montana 59601
FTS 8-587-2821
CML (406) 449-2821

Nebraska

Maurice W. (Bill) Sheil, Chief
Solid waste Division
Department of Environmental Control
State House Station
P.O. Box 94877
Lincoln, Nebraska 68509
FTS 8-541-2186
CML (402) 471-2186

Nevada

Lewis H. Dodgin, Administrator
Division of Environmental Protection
Department of Conservation and
Natural Resources
Capital Complex
Carson City, Nevada 89710
CML (702) 885-4670

New Hampshire

Thomas L. Sweeney, Chief
Bureau of Solid Waste
Department of Health and Welfare
Health and Welfare Building
Hazen Drive
Concord, New Hampshire 03301
CML (603) 271-4610

New Jersey

Lino F. Pereira, Acting Director
Solid Waste Administration
Division of Environmental Quality
P.O. Box C9027
Trenton, New Jersey 08625
FTS 8-477-9120
CML (609) 292-9120

New Mexico

Jon Thompson, Chief
Community Support Services Section
Health and Environment Department
P.O. Box 968, Crown Building
Santa Fe, New Mexico 87503
FTS 8-476-5271, Ext. 272
CML (505) 827-5271, Ext. 272

Dr. Ray Krehoff, Program Manager
Solid and Hazardous Waste Mgmt. Programs
Community Support Services Section
Health and Environment Department
P.O. Box 968, Crown Building
Santa Fe, New Mexico 87503
FTS 8-476-5271, Ext. 282
CML (505) 827-5271 Ext. 282

New York

Norman H. Nosenchuck, Director
Division of Solid Waste Management
Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233
FTS 8-567-6603
CML (518) 457-6603

North Carolina

O.W. Strickland, Head
Solid and Hazardous Waste Management Branch
Division of Health Services
Department of Human Resources
P.O. Box 2091
Raleigh, North Carolina 27602
CML (318) 457-6603

North Dakota

Jay Crawford, Director
Division of Environmental Waste Management
and Research
Department of Health
1200 Missouri Avenue
Bismarck, North Dakota 58505
CML (701) 224-2382

Ohio

Donald E. Day, Chief
Office of Land Pollution Control
Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216
FTS 8-942-8934
CML (614) 466-8934

Oklahoma

H.A. Caves, Chief
Industrial and Solid Waste Service
Department of Health
P.O. Box 53551
1000 N.E. 10th Street
Oklahoma City, Oklahoma 73152
CML (405) 271-5338

Oregon

Ernest A. Schmidt, Administrator
Solid Waste Management Division
Department of Environmental Quality
P.O. Box 1760
522 S.W. 5th Avenue
Portland, Oregon 97207
FTS 8-424-5913
CML (503) 229-5913

Pennsylvania

Donald A. Lazarchik
Bureau of Solid Waste Management
Department of Environmental Resources
Fulton Building
P.O. Box 2063
Harrisburg, Pennsylvania 17120
FTS 8-637-9870
CML (717) 787-9870

Puerto Rico

Santos Rohena, Associate Director
Environmental Quality Board
Office of the Governor
P.O. Box 11488
Sanjurjo, Puerto Rico 00910
D.C. Overseas Operator and FTS:
472-6620
CML (809) 725-2062 Ext. 229 or 264

Rhode Island

John S. Quinn, Jr., Chief
Solid Waste Management Program
Department of Environmental Management
204 Cannon Building
75 Davis Street
Providence, Rhode Island 02908
CML (401) 277-2808

Lou David, Jr. Executive Director
Rhode Island Solid Waste Corporation
39 Pike Street
Providence, Rhode Island 02903
CML (401) 831-4440

South Carolina

Hartsill W. Truesdale, Director
Solid Waste Management Division
Department of Health and Environmental
Control
J. Marion Simms Building
2600 Bull Street
Columbia, South Carolina 29201
CML (803) 758-5681

South Dakota

Joel C. Smith, Chief
Air Quality and Solid Waste Programs
Department of Health
Joe Foss Building
Pierre, South Dakota 57501
CML (605) 773-3329

Tennessee

Tom Tiesler, Director
Division of Solid Waste Management
Bureau of Environmental Services
Department of Public Health
Capitol Hill Building, Suite 326
Nashville, Tennessee 37219
FTS 8-653-3424
CML (615) 741-3424

Texas

Jack C. Carmichael, Director
Division of Solid Waste Management
Texas Department of Health
1100 West 49th Street
Austin, Texas 78756
CML (512) 458-7271

Jay Snow, P.E.
Head, Industrial Solid Waste Unit
Department of Water Resources
1700 North Congress
P.O. Box 13087 Capitol Station
Austin, Texas 78711
CML (512) 475-2041

Utah

Dale Parker, Director
Bureau of Solid Waste Management
Division of Environmental Health, State
Department of Health
P.O. Box 2500
150 West North Temple
Salt Lake City, Utah 84110
CML (801) 533-4145

Vermont

Richard A. Valentinetti, Chief
Air and Solid Waste Programs
Agency of Environmental Conservation
State Office Building
Montpelier, Vermont 05602
FTS 8-6352-3395
CML (802) 828-3395

Virgin Islands

Donald Francois
Department of Cultural Affairs
Government of the Virgin Islands
Natural Resources Management Building
Sub-Base
St. Thomas, Virgin Islands 00801
D.C. Overseas Operator 472-6620
CML (809) 774-6420

Virginia

William F. Gilley, Director
Bureau of Solid and Hazardous Waste
Management
Department of Health
109 Governor Street
Richmond, Virginia 23219
FTS 8-936-5271
CML (804) 786-5271

Washington

Earl Tower, Supervisor
Solid Waste Management Division
Department of Ecology
Olympia, Washington 98504
FTS 8-434-6883
CML (206) 753-6883

West Virginia

Dale Parsons, Director
Solid Waste Division
Department of Health
1800 Washington Street, E.
Charleston, West Virginia 25305
FTS 8-885-2987
CML (304) 348-2987

John Northeimer
Division of Water Resources
Department of Natural Resources
1201 Greenbrier Street
Charleston, West Virginia 25311
CML (304) 348-0375

Wisconsin

Robert Krill, Director
Bureau of Waste Management
Department of Natural Resources
Box 7921
Madison, Wisconsin 53707
FTS 8-366-1327
CML (608) 266-1327

Wyoming

Charles Porter, Supervisor
Solid Waste Management Program
state of Wyoming
Department of Environmental Quality
Equality State Bank Building
401 West 19th Street
Cheyenne, Wyoming 82002
FTS 8-329-7752
CML (307) 777-7752