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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JUNE 87

A. RCRA PROGRAM

1. Waste Minimization Requirements

What is the basis for waste minimization and what is required?

In the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) (Section 3002), Congress stated that as a matter of national policy, the generation of hazardous waste should be reduced or eliminated as expeditiously as possible. Waste that is nevertheless generated should be treated, stored or disposed of so as to minimize the present and future threat to human health and the environment.

HSWA required that generators of a hazardous waste submit a biennial report to the Regional Administrator which would include: 1) efforts undertaken during the year to reduce the volume and toxicity of waste generated, and 2) the changes in volume and toxicity of waste actually achieved during the year in comparison with previous years (Section 3002 (a)(6)(A-C). Effective September 1, 1985, generators had to use a manifest containing a certification by the generator that he had a program in place to reduce the volume or quantity and toxicity of hazardous waste to the degree determined by the generator to be economically practicable. The program must include a practicable method currently available to the generator which minimize the present and future threat to human health and the environment. Also effective September 1, 1985, any permit used under Section 3004 of the Solid Waste Disposal Act for the treatment, storage or disposal of hazardous waste must require that the permittee certify no less often than annually that he has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the permittee to be economically practicable. The permittee's proposed method of treatment, storage or disposal must include a practicable method currently available to him which minimizes the present and future threat to human health and environment.

The term "waste minimization" has been defined differently by different organizations. The U.S. EPA, in its October 1986 Report to Congress on

the minimization of hazardous waste, defined waste minimization as:

"The reduction, to the extent feasible, of hazardous waste that is generated or subsequently treated, stored, or disposed of. It includes any source reduction or recycling activity undertaken by a generator that results in either: (1) the reduction of total volume or quantity of hazardous waste or (2) the reduction of toxicity of hazardous waste, or both, so long as the reduction is consistent with the goal of minimizing present and future threats to human health and the environment. Waste minimization does not include treatment of hazardous waste."

Source: Elaine Eby (202) 475-7237

Research: Carla A. Rellergert