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OPERATOR AT GOVERNMENT-OWNED CONTRACTOR-OPERATED (GOCO)
FACILITIES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 24 1987

MEMORANDUM

SUBJECT: Determination of Operator at Government-Owned
Contractor-Operated (GOCO) Facilities

FROM: Gene A. Lucero, Director
Office of Waste Programs Enforcement

Marcia E. Williams, Director
Office of Solid Waste

TO: Waste Management Division Directors
Regions I - X

The purpose of this memorandum is to clarify who should sign as the operator on permit applications for Government-Owned Contractor-Operated (GOCO) facilities. Earlier guidance (see attached memo) had recommended that the Regional office consider the role of the contractor in the operation of the facility before determining who should sign the permit application. We also noted that in some cases where the contractor's role is less precisely defined the Region should exercise judgement given the factual situation.

It appears that there is still some confusion regarding signatories for permit applications. Whenever a contractor or contractors at a government-owned facility, are responsible or partially responsible for the operation, management or oversight of hazardous waste activities at the facility; they should sign the permit as the operator(s). In some instances both the Federal agency and the contractor(s) are the operators and multiple signatures to that effect would be appropriate. A review of the facility's operating records, contingency plans, personnel training records, and other documents relating to waste management should indicate who the operator(s) are. As a general rule, contractors will meet this test and therefore in most

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situations should be required to sign the permit application.

If you have any questions please contact Jim Michael, Office of Solid Waste at FTS 382-2231 or Anna Duncan, Office of Waste Programs Enforcement at FTS 382-4829.

Attachment

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Elaine Stanley, OWPE
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Matt Hale, PSPD
Federal Facility Coordinators, Region I-X

bcc: Jim Michael, OSW
Anna Duncan, OWPE
Suzanne Rudzinski, PSPD