

Anthony F. Adamo, P.E.
Drash Consulting Engineers, Inc.
1506 Mid-Cities Drive
Pharr, TX 78577

Dear Mr. Adamo:

Thank you for your letter of December 23, 2002, to Administrator Whitman regarding the Agency's Resource Conservation and Recovery Act (RCRA) Burden Reduction Initiative Proposed Rule. In your letter, you asked about our proposal to expand the universe of professionals who can certify the proper design and operation of hazardous waste treatment, storage and disposal facilities. We will include your comments in the docket to this rulemaking.

Currently, many RCRA regulations require an independent, registered Professional Engineer to certify the effectiveness of the design and operation of certain types of permitted units. In a June 18, 1999 *Federal Register* notice (see 64 FR 32859), EPA announced the RCRA Burden Reduction Initiative. We received a comment from the Certified Hazardous Materials Managers' (CHMM) organization asking that their members be allowed to certify the effectiveness of design and operations at hazardous waste facilities where only Professional Engineers are currently allowed to certify. As a result of that suggestion, we proposed to add CHMMs to the group of professionals able to make some of these certifications and solicited comment on what other professionals also might be capable of certifying compliance. Our intent was to provide new opportunities for all qualified individuals.

Your comments will assist us in developing the final rulemaking by helping better define who should be allowed to make these certifications. We are reviewing comments now, but have not yet made any final decisions.

Sincerely,

Robert Springer, Director
Office of Solid Waste

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