United States
Environmental Protection
Agency

Solid Waste
and Emergency Response
(5306W)

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June 1996

EPA

1996 Buy-Recycled Series
Paper Products

ECO PURCHASING

Eight years ago, hardly any recycled-content printing and writing paper existed. Now, it's readily available, along with recycled-content computer printout paper, stationery, note pads, paper towels, and corrugated packaging—and at higher quality and more competitive prices than ever before. That's in part due to the leadership shown by government agencies since 1988, when the U.S. Environmental Protection Agency (EPA) issued the Procurement Guideline for Paper and Paper Products Containing Recovered Materials. The 1988 paper guideline's buy-recycled requirements are now part of EPA's Comprehensive Procurement Guideline (CPG).

The CPG identifies seven categories of items, including paper products, that federal, state, or local agencies, or government contractors, using appropriated federal funds should purchase with recycled content. To help guide your purchasing decisions, EPA also issues Recovered Materials Advisory Notices (RMANs), which recommend ranges of recycled content for each product designated in the CPG. EPA has now updated the recommendations for paper products in the recently issued Paper Products RMAN.

Although federal agencies have made great strides in buying recycled-content paper, more can be done. After all, paper is still the most predominant material in our trash. So the next time you stock up on paper for your printer, copy machine, cafeteria, or restrooms, buy recycled. By doing this, you're helping create a demand for the used office paper, old newspapers, and boxes we recycle every day.

EcoPurchasing means considering attributes such as

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recycled content
toxicity
reusability
durability
repairability

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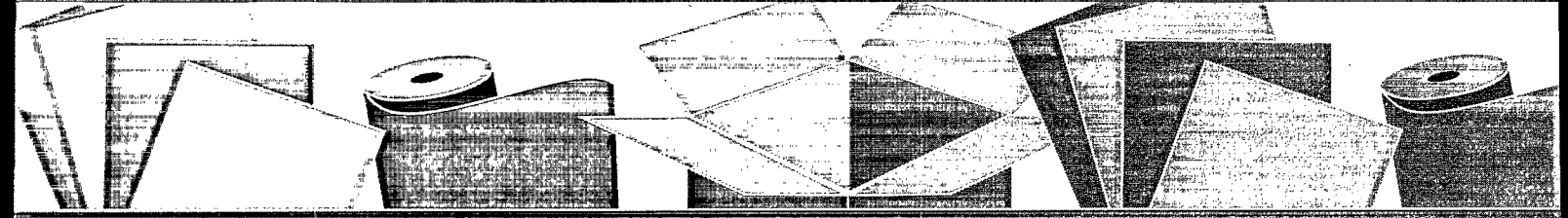
before you buy a product.

Recycled/Recyclable • Printed with Vegetable Based Inks on Recycled Paper (20% Postconsumer)



What Is The CPG?

The CPG requires federal agencies to give preference to items made from recovered materials.

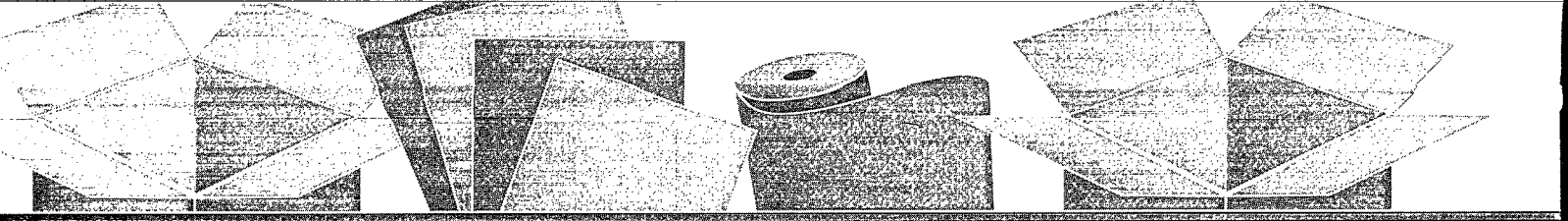
Paper recycling is increasing all across America, making it more important than ever to find buyers for this recovered fiber and promote purchasing of recycled-content paper by government agencies.

That's in part why Congress included government buy-recycled requirements for paper in the Resource Conservation and Recovery Act (RCRA). In response to RCRA, EPA issued its recycled-content recommendations for paper products in 1988. President Clinton reinforced those requirements when he signed Executive Order 12873 in October 1993 calling for an increase in the federal government's use of recycled-content products, especially paper products.

In response to the Executive Order, EPA issued the CPG in May 1995. The CPG designates 19 new products and incorporates 5 previously designated items (including paper) in 7 product categories that procuring agencies are required to purchase with recycled content. (A procuring agency is any federal, state, or local agency or government contractor that uses appropriated federal funds to purchase products.) If your agency spends more than $10,000 per year on a product listed in the CPG, you are required to purchase it with the highest recycled-content level practicable. The CPG also applies to lease contracts covering designated items.

The items covered in the paper products category include various types of printing and writing papers, newsprint, sanitary tissue products, and paperboard and packaging. Your agency should review its existing affirmative procurement program to see if any changes are necessary to meet the requirements for these products. This might involve reviewing specifications or solicitation documents for paper products and eliminating provisions that might pose a barrier to their procurement (such as aesthetic requirements, including brightness and dirt content, unrelated to product performance). As soon as the updated program is in place, your agency should begin following the guidelines for purchasing these products whenever practicable.

The CPG acknowledges, however, that specific circumstances might arise that could preclude the purchase of paper products with recovered materials. Under the CPG, you may choose to purchase designated items that do not contain recovered materials if you determine that (1) the price of a given item made with recovered materials is unreasonable, (2) there is inadequate competition (not enough sources of supply) for the item, (3) unusual and unreasonable delays would result from obtaining the item, or (4) the item does not meet your agency's reasonable performance specifications.



How Do I Purchase Recycled-Content Paper Products?

Key Terms

Before buying recycled-content paper products meeting EPA's recommendations, you'll need to understand some important terms. (See the RMAN for a complete discussion of these terms.)

Postconsumer fiber:

- Is the paper recovered in our homes and offices.
- Does not include newsstand returns and printers' overruns.

Recovered fiber:

- Includes scrap generated at mills after the end of the papermaking process; converting and printing scrap; newsstand returns and printers' overruns; obsolete inventory of mills, printers, and others; damaged stock; and postconsumer fiber.
- Is not waste. EPA has replaced the term waste paper used in the 1988 guidelines with recovered fiber, to acknowledge that this material is a valuable resource.
- Must be repulped. Paper cannot simply be re-cut or repackaged to count as recovered-content paper.
- Does not include forest residues such as sawdust and wood chips from forestry operations.

Mill broke:

- Is scrap generated in a mill prior to the completion of the papermaking process.
- EPA recommends that you allow mills to count the recycled-content portion of mill broke. You should not count the nonrecycled-content portion, however.

Recycled-Content Recommendations

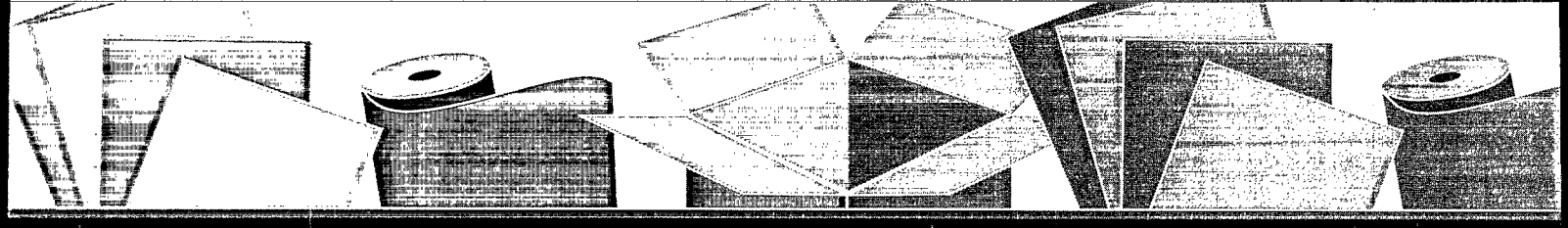
The Paper Products RMAN recommends recycled-content levels that you can look for when purchasing paper products, as shown in the chart on pages 4 and 5. Use EPA's RMAN recommendations as a starting point. The recommendations are based on market research to identify recycled-content products that are commercially available.

Rather than just one level of recycled content, the RMAN recommends ranges for many paper products that reflect what is currently available in the United States. Because the recycled content of paper products varies, you should contact local paper mills or merchants to determine product availability. Try to purchase paper containing the highest content that is available to you.

When buying paper other than printing and writing paper, specify that you want paper "containing X percent recovered fiber, including Y percent postconsumer fiber." (For most printing and writing papers, you can simply say you're looking for 20 percent postconsumer content.)

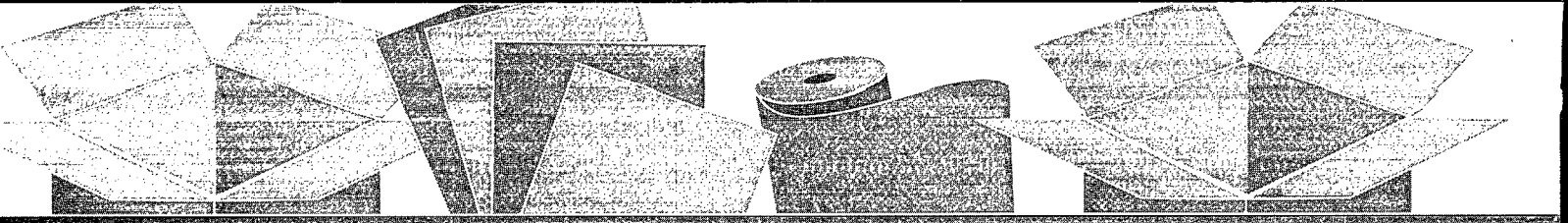
In addition, make sure that you measure recovered and postconsumer fiber content as a percentage of the weight of all **fiber** in the paper, not as a percentage of the total weight of the sheet. (The total weight also includes the weight of dyes, fillers, and water used in the manufacturing process.)

The RMAN recommends recycled-content levels to look for when purchasing paper products.

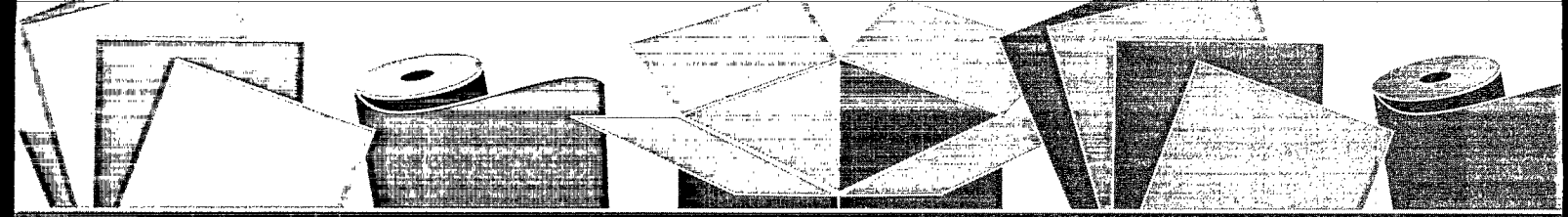


RMAN Levels for Paper Products

Item	Notes	Recovered Content (%)	Post-consumer Content (%)
Printing and Writing Papers			
Cotton fiber	High-quality papers used for stationery, invitations, currency, ledgers, maps, and other specialty items	20	20
Text and cover	Premium papers used for cover stock, books, and stationery and matching envelopes	20	20
Papeteries	Used for invitations and greeting cards	20	20
Offset	Used for book publishing, commercial printing, direct mail, technical documents, and manuals	20	20
Reprographic	Business papers such as bond, electrostatic, copy, mimeo, duplicator, and reproduction	20	20
Forms bond	Bond type papers used for business forms such as continuous, cash register, sales book, unit sets, and computer printout, excluding carbonless	20	20
Tablet	Office paper such as note pads and notebooks	20	20
Envelope	Wove Kraft, white and colored (including manila) Kraft, unbleached Excludes custom envelopes	20 10-20 10	20 10-20 10
Supercalendered	Groundwood paper used for advertising and mail order inserts, catalogs, and some magazines	10	10
Machine finished groundwood	Groundwood paper used in magazines and catalogs	10	10
Check safety	Used in the manufacture of commercial and government checks	10	10
Coated	Used for annual reports, posters, brochures, and magazines. Have gloss, dull, or matte finishes	10	10
Carbonless	Used in the production of multiple impact copy forms	20	20
File folders	Manila or kraft	20	20
Dyed filing products	Used for multicolored hanging folders	20-50	20
Index and card stock	Used for index cards, postcards	50	20
Pressboard	High-strength paperboard used in binders and report covers	50	20
Tags and tickets	Used for toll and lottery tickets, licenses, and identification and tabulating cards	20-50	20



Item	Notes	Recovered Content (%)	Post-consumer Content (%)
Newsprint			
Newsprint	Groundwood paper used in newspapers	20-100	20-85
Commercial Sanitary Tissue Products			
Bathroom tissue	Used in rolls or sheets	20-100	20-60
Paper towels	Used in rolls or sheets	40-100	40-60
Paper napkins	Used in food service applications	30-100	30-60
Facial tissue	Used for personal care	10-100	10-15
General-purpose industrial wipers	Used in cleaning and wiping applications	40-100	40
Paperboard and Packaging Products			
Corrugated containers	Used for packaging and shipping a variety of goods		
(<300 psi)		25-50	25-50
(300 psi)		25-30	25-30
Solid fiber boxes	Used for specialized packaging needs such as dynamite packaging and army ration boxes	40	40
Folding cartons	Used to package a wide variety of foods, household products, cosmetics, pharmaceuticals, detergent, and hardware	100	40-80
Industrial paperboard	Used to create tubes, cores, cans, and drums	100	45-100
Miscellaneous	Includes "chipboard" pad backings, book covers, covered binders, mailing tubes, game boards, and puzzles	90-100	75-100
Padded mailers	Made from kraft paper that is usually brown but can be bleached white	5-15	5-15
Carrierboard	A type of folding carton designed for multi-pack beverage cartons	10-100	10-15
Brown papers	Used for bags and wrapping paper	5-40	5-20
Miscellaneous Paper Products			
Tray liners	Used to line food service trays. Often contain printed information	100	50-75



Remember to specify recycled-content papers in printing and janitorial contracts.

Buying Tips

To make it even easier to buy recycled-content paper products, EPA offers the following purchasing tips for the various paper product categories outlined in the RMAN.

Printing and writing papers comprise one of the largest categories of paper and paper products. Examples include stationery, computer printout paper, note pads, copier paper, and offset paper. Printing and writing papers can be either uncoated or coated.

When buying printing and writing paper, remember to:

- Work with your printer. Different papers exhibit differences in performance and printability. Some printers may first want to test certain papers with a particular ink. Printers can also help you select papers based on how they will be used (i.e., whether they will be folded, die-cut, or made into self-mailers).
- Work with your graphic designer. Some papers are better than others for certain design needs. Make sure both the designer and printer agree that the paper you choose will meet your expectations.
- Consider the environmental ramifications of your purchasing decisions. Papers with certain characteristics such as deep colors, coatings, or groundwood content might not be recyclable in your existing office paper recycling program or might require changes to the program. Consider the effects of your paper purchases before deciding to purchase a specific paper.

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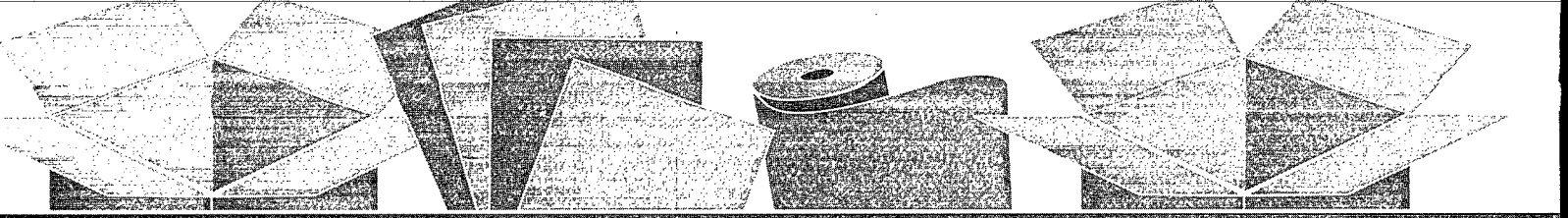
Newsprint is a type of groundwood paper generally used to print newspapers. Recycled-content newsprint is usually manufactured from fiber recovered from old newspapers and magazines. The federal government uses newsprint for printing the *Federal Register, Congressional Record,* and other publications.

When purchasing newsprint, consider these helpful hints:

- Pay attention to newsprint's basis weight. Basis weight is the weight in pounds of a ream of paper cut to a specified size. Different weights hold up better in different presses. Recycled-content newsprint ranging from 25 to 32 pounds generally performs well. The U.S. Government Printing Office specifies 25 pound recycled-content newsprint.
- Consider your requirements for the newsprint you're buying. Recycled-content newsprint manufacturers are making products that meet their clients' performance requirements (e.g., printability, brightness, cleanliness, and opacity).



- Determine whether newsprint is recyclable in your existing recycling program. Some office paper recycling programs do not accept groundwood papers such as newsprint. Find out whether yours does before you buy newsprint.

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Sanitary tissue products include bathroom and facial tissue, paper towels, napkins, and general-purpose industrial wipers. When purchasing these products:

- Avoid misconceptions about softness, absorbency, and strength. Some recycled-content sanitary tissue products are softer, stronger, and more absorbent than others. Consider your aesthetic and functional requirements for tissue products before purchasing a specific product.
- Remember to review your janitorial supply contracts because commercial tissue products are often purchased through contractors. Make sure your supply contracts specify recycled-content, not virgin, products.
- When changing brands, consider other factors that could influence your purchasing decision. For example, when switching from sheet to roll paper towels, you may incur costs to replace dispensers or fixtures if such costs are not borne by the supplier.

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Paperboard and packaging is a broad category of paper products that includes corrugated containers, folding cartons, book and report covers, mailing tubes, video cassette boxes, paper bags, and kraft wrapping paper. They can be manufactured with a wide variety of recovered fibers including old newspapers, old corrugated containers, mixed papers, and sorted white office paper. In fact, paperboard mills use more recovered fiber than any other segment of the paper industry.

When purchasing recycled-content paperboard and packaging:

- Remember that you can print on recycled boxes, not just on virgin, bleached boxes.
- Be aware that you can use recycled boxes in food applications and still meet Food and Drug Administration requirements.

Determine whether your existing recycling program includes newsprint and packaging.

How Do I Get More Information?

Information Available from EPA

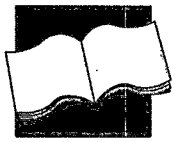
The following publications on buying recycled and the CPG are available through the RCRA Hotline. To order, call 800 424-9346 (or 800 553-7672 for the hearing impaired). In Washington, DC, the number is 703 412-9810 or TDD 703 412-3323. The RCRA Hotline is open from Monday through Friday, 9 a.m. to 6 p.m. EST.

- *Federal Register* notices establishing the CPG (60 FR 21370/EPA530-Z-95-007), May 1, 1995, and the Paper Products RMAN (61 FR 26985/EPA530-Z-96-005), May 29, 1996.
- ***EPA Issues Comprehensive Procurement Guideline*** (EPA530-F-95-010). This four-page fact sheet provides general information about the CPG and the development of affirmative procurement programs.
- ***Summary of Comments on the Proposed Paper Products RMAN*** (EPA530-R-96-003) and ***Final Paper Products RMAN—Response to Public Comments*** (EPA530-R-96-004). These background documents to the Paper Products RMAN summarize comments EPA received on the draft RMAN and EPA's response to those comments.
- ***Draft Paper Products RMAN–Supporting Analyses*** (EPA530-D-95-001). This document provides useful information about the various paper products listed in the Paper Products RMAN.

The following lists of recycled-content paper manufacturers are also available from EPA:

- ***Mills Which Manufacture Printing and Writing Paper, Computer Paper, Office Paper, Envelopes, Bristols, and Coated Printing and Writing Papers Using Recovered Paper*** (EPA530-B-95-010).
- ***Mills Which Manufacture Newsprint Containing at Least 40 Percent Postconsumer Recovered Paper*** (EPA530-B-95-009).
- ***Tissue Mills Which Use Postconsumer Recovered Paper*** (EPA530-B-95-008).

The above documents are also available on EPA's Public Access Server on the Internet (gopher.epa.gov). For the text of *Federal Register* notices, choose: ***Rules, Regulations, and Legislation; Waste Programs; EPA Waste Information-GPO;*** and ***Year/Month/Date.*** This fact sheet, the technical support documents, and the product availability lists are available under ***EPA Offices and Regions; Office of Solid Waste and Emergency Response; Office of Solid Waste; Nonhazardous Waste; and Procurement.***



Other Sources of Information

- **Executive Orders 12873 (October 30, 1993) and 12995 (March 28, 1996).** Copies of these Presidential Executive Orders are available from the Executive Office of the President Publications Distribution Service at 202 395-7332.
- **U.S. General Services Administration (GSA).** GSA publishes various supply catalogs, guides, and schedules for products available through the Federal Supply Service. The *Environmental Products Guide* is designed to help procurement officials identify environmentally preferable products and services. It contains more than 1,500 paper and paper products containing recovered materials. For a copy of the guide, contact GSA, Centralized Mailing List Service (7CAFL), 4900 Hemphill St., P.O. Box 6477, Fort Worth, TX 76115. Phone: 817 334-5215. Fax: 817 334-5227.
- **U.S. Government Printing Office (GPO).** GPO provides a variety of recycled-content paper products to federal agencies to meet their printing needs. For more information about the paper products available from GPO, contact Doris Reynolds, Printing Specialist, U.S. GPO, Paper and Materials Control Section, Stop POL, North Capitol and H Streets, NW., Washington, DC 20401. Phone: 202 512-0241.
- ***The Official Recycled Products Guide.*** This directory lists more than 5,000 manufacturers and distributors of recycled-content products. For more information, contact the Recycling Data Management Corp., P.O. Box 577, Ogdensburg, NY 13669. Phone: 800 267-0707.
- **National Office Paper Recycling Project.** The National Office Paper Recycling Project maintains a list of recycled-content paper producers and has published several guidebooks on setting up and promoting office buy-recycled and recycling programs. For more information, contact the National Office Paper Recycling Project, 1620 Eye St., NW., Sixth Floor, Washington, DC 20006. Phone: 202 293-7330. Fax: 202 429-0422.
- ***Jaakko Poyry Recycled Gradefinder.*** This quarterly publication provides a comprehensive, up-to-date directory of almost 1,000 brands of recycled-content paper. Entries include brand name, manufacturer, grade, postconsumer content, brightness, and basis weights. The entries are organized alphabetically by brand name, manufacturer or distributor, and grade. A one-year subscription costs $90. To order, contact Ronni Schram, Jaakko Poyry Consulting, Inc., 580 White Plains Road, Tarrytown, NY 10591-5183. Phone: 800 872-5792. Fax: 914 332-4411.

In addition, contact your state solid waste agency for information about local and regional businesses that produce or distribute recycled-content paper products.

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EPA

The Hazardous Waste Facility Permitting Process

What Are Hazardous Wastes?

Hazardous wastes can be liquids, solids, or sludges. They can be by-products of manufacturing processes or discarded commercial products. If hazardous wastes are not handled properly, they pose a potential hazard to people and the environment. To ensure that companies handle waste safely and responsibly, EPA has written regulations that track hazardous wastes from the moment they are produced until their ultimate disposal. The regulations set standards for the hazardous waste management facilities that treat, store, and dispose of hazardous wastes.

What Is a Hazardous Waste Management Facility?

Hazardous waste management facilities receive hazardous wastes for treatment, storage, or disposal. These facilities are often referred to as treatment, storage, and disposal facilities, or TSDFs.

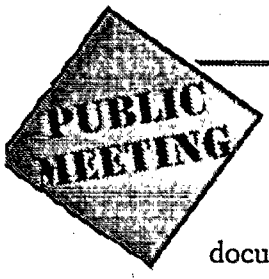
- *Treatment* facilities use various processes (such as incineration or oxidation) to alter the character or composition of hazardous wastes. Some treatment processes enable waste to be recovered and reused in manufacturing settings, while other treatment processes dramatically reduce the amount of hazardous waste.
- *Storage* facilities temporarily hold hazardous wastes until they are treated or disposed of.
- *Disposal* facilities permanently contain hazardous wastes. The most common type of disposal facility is a landfill, where hazardous wastes are disposed of in carefully constructed units designed to protect ground-water and surface-water resources.

What Laws and Regulations Govern TSDFs?

EPA has written detailed regulations to make sure that TSDFs operate safely and protect people and the environment. EPA wrote these regulations to implement the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments of 1984. The U.S. Congress passed these laws to address public concerns about the management of hazardous waste.

EPA can authorize states to carry out the RCRA program. To receive authorization, state requirements must be as strict, or stricter, than the federal requirements. Federal or state agencies that implement RCRA are known as "permitting agencies."

Printed on paper that contains at least 20 percent postconsumer fiber.



What Is a RCRA Permit?

A RCRA permit is a legally binding document that establishes the waste management activities that a facility can conduct and the conditions under which it can conduct them. The permit outlines facility design and operation, lays out safety standards, and describes activities that the facility must perform, such as monitoring and reporting. Permits typically require facilities to develop emergency plans, find insurance and financial backing, and train employees to handle hazards. Permits also can include facility-specific requirements such as groundwater monitoring. The permitting agency has the authority to issue or deny permits and is responsible for monitoring the facility to ensure that it is complying with the conditions in the permit. According to RCRA and its regulations, a TSDF cannot operate without a permit, with a few exceptions.

Who Needs a RCRA Permit?

All facilities that currently or plan to treat, store, or dispose of hazardous wastes must obtain a RCRA permit.

- *New TSDFs* must receive a permit before they even begin construction. They must prove that they can manage hazardous waste safely and responsibly. The permitting agency reviews the permit application and decides whether the facility is qualified to receive a RCRA permit. Once issued, a permit may last up to 10 years.
- *Operating TSDFs* with expiring permits must submit new permit applications six months before their existing permits run out.
- *TSDFs operating under Interim Status* must also apply for a permit. Congress granted "interim status" to facilities that already existed when RCRA was enacted. Interim status allows existing facilities to continue operating while their permit applications are being reviewed.

Who Does Not Need a RCRA Permit?

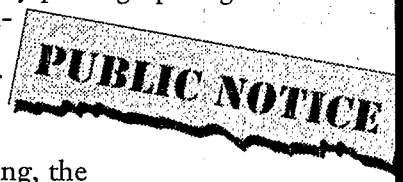
There are certain situations where a company is not required to obtain a RCRA a permit.

- *Businesses that generate hazardous waste* and transport it off site without storing it for long periods of time do not need a RCRA permit.
- *Businesses that transport hazardous waste* do not need a RCRA permit.
- *Businesses that store hazardous waste* for short periods of time without treating it do not need a permit.

What Are the Steps in the Permitting Process?

Step 1 *Starting the Process*

Before a business even submits a permit application, it must hold an informal meeting with the public. The business must announce the "preapplication" meeting by putting up a sign on or near the proposed facility property, running an advertisement on radio or television, and placing a display advertisement in a newspaper. At the meeting, the business explains the plans for the facility, including information about the proposed processes it will use and wastes it will handle. The public has the opportunity to ask questions and make suggestions. The business may choose to incorporate the public's suggestions into its application. The permitting agency uses the attendance list from the meeting to help set up a mailing list for the facility.



Step 2 *Applying for a Permit*

After considering input from the preapplication meeting, the business may decide to submit a permit application. Permit applications are often lengthy. They must include a description of the facility and address the following:

- How the facility will be designed, constructed, maintained, and operated to be protective of public health and the environment.
- How any emergencies and spills will be handled, should they occur.
- How the facility will clean up and finance any environmental contamination that occurs.
- How the facility will close and clean up once it is no longer operating.

FINAL REISSUED DENIE

Step 3 *Receipt and Review of the Application*

When the permitting agency receives a permit application, it sends a notice to everyone on the mailing list. The notice indicates that the agency has received the application and will make it available for public review. The permitting agency must then place a copy of the application in a public area for review.

Simultaneously, the permitting agency begins to review the application to make sure it contains all the information required by the regulations. The proposed design and operation of the facility are also evaluated by the permitting agency to determine if the facility can be built and operated safely.

Step 4 *Revisions, Revisions, Revisions*

After reviewing the application, the permitting agency may issue a Notice of Deficiency (NOD) to the applicant. NODs identify and request that the applicant provide any missing information. During the application review and revision process, the permitting agency may issue several NODs. Each time the permitting agency receives a response from the applicant, it reviews the information and, if necessary, issues another NOD until the application is complete. Given the complex and technical nature of the information, the review and revision process may take several years.

Step 5 *Drafting the Permit for Public Review*

When the revisions are complete, the agency makes a preliminary decision about whether to issue or deny the permit. If the agency decides that the application is complete and meets appropriate standards, the agency issues a draft permit containing the conditions under which the facility can operate if the permit receives final approval. If the permitting agency determines that an applicant cannot provide an application that meets the standards, the agency tentatively denies the permit and prepares a "notice of intent to deny."

The permitting agency announces its decision by sending a letter to everyone on the mailing list, placing a notice in a local paper, and broadcasting it over the radio. It also issues a fact sheet to explain the decision. Once the notice is issued, the public has 45 days to comment on the decision. Citizens also may request a public hearing by contacting the permitting agency. The permitting agency may also hold a hearing at its own discretion. The agency must give 30-day public notice before the hearing.

Step 6 *The End Result: A Final Permit Decision*

After carefully considering public comments, the permitting agency reconsiders the draft permit or the notice of intent to deny the permit. The agency must issue a "response to public comments," specifying any changes made to the draft permit. The agency then issues the final permit or denies the permit.

Even after issuing a permit, the permitting agency continues to monitor the construction and operation of the facility to make sure they are consistent with state and federal rules and with the application.

Several additional steps can also take place after the original permit is issued:

- ***Permit Appeals.*** Facility owners and the public both have a right to appeal the final permit decision. The appeal is usually decided upon by administrative law judges.
- ***Permit Modifications.*** If a facility changes its management procedures, mechanical operations, or the wastes it handles, then it must secure a permit modification. For modifications that significantly change facility operations, the public must receive early notice and have a chance to participate and comment. For minor modifications, the facility must notify the public within a week of making the change.
- ***Permit Renewals.*** The permitting agency can renew permits that are due to expire. Permit holders that are seeking a permit renewal must follow the same procedures as a facility seeking a new permit.
- ***Permit Terminations.*** If a facility violates the terms of its permit, the permitting agency can terminate the permit.

PUBLIC HEARING DRAFT

How Can the Public Participate?

Members of the public have valid concerns about hazardous waste management. They and other interested parties can contribute valuable information and ideas that improve the quality of both agency decisions and permit applications. EPA believes that public participation is a vital component of the permitting process. Accordingly, EPA has written regulations that create opportunities for the public to learn about RCRA activities and give input during the permitting process. The preapplication meeting, public comment and response periods, and public hearings are all instances where citizens can engage companies and regulators in a dialogue. Furthermore, EPA encourages permitting agencies, permit holders or applicants, and other interested parties to provide additional public participation activities where they will be helpful.

EPA also realizes that some of the most important public participation activities happen outside the formal permitting process. Citizens can contact environmental, public interest, and civic and community groups that have an interest in the facility and become involved in their activities. The permit holder or applicant may also create informal opportunities for public input and dialogue.

The permitting process gives citizens a number of opportunities to express their ideas and concerns. Here are several steps you can take to ensure that your voice is heard:

- Know whom to call at the permitting agency. Early in the process, call the agency to determine the contact for the project. This person's name also should be on fact sheets and other printed materials.
- Ask to have your name put on the facility mailing list for notices, fact sheets, and other documents distributed by the agency.
- Do your own research by talking to local officials, contacting research or industry organizations, reading permitting agency materials, and interacting with interested groups in the community.
- Submit written comments that are clear, concise, and well documented. Remember that, by law, permitting agencies must consider all significant written comments submitted during a formal comment period.
- Participate in public hearings and other meetings. Provide testimony that supports your position. Remember that a public hearing is not required unless a citizen specifically requests one in writing.
- If any material needs further explanation, or if you need to clear up some details about the facility or the permitting process, request an informational meeting with the appropriate official. You also may want to call the facility to meet with the staff or to request a tour or other information.
- Follow the process closely. Watch for permitting agency decisions and review the agency's responses to public comments. Remember that citizens may have an opportunity to appeal agency decisions.
- Remember that your interest and input are important to the permitting agency.

In Conclusion

The permitting process for a hazardous waste management facility requires a significant amount of time and effort. Each participant plays a distinct and essential role. *Permit applicants* must carefully consider the RCRA regulations when developing and submitting their applications and planning public involvement activities. The *permitting agency* must review the permit application to ensure that it is complete, adequate, and protective of public health and the environment. The agency must also coordinate this review to ensure community involvement. The *public* should become familiar with the permitting process and participate in it so that community concerns are heard and acted upon. This coordination of efforts will help to ensure that the environment and citizens of the United States are protected by proper management of hazardous wastes.

For More Information

For more information, call the RCRA Hotline at 800 424-9346 or TDD 800 553-7672 (hearing impaired). In the Washington, DC, area, call 703 412-9810 or TDD 703 412-3323. You can request the documents *RCRA Public Participation Manual* or *RCRA Expanded Public Participation Rule* (brochure). You can also obtain contact people and phone numbers for your state or regional hazardous waste agency. Additional information can be found in Title 40 *Code of Federal Regulations*, Parts 124, 270, and 271.

The *RCRA Expanded Public Participation Rule* brochure and this fact sheet are accessible on the Internet. Go to either *gopher.epa.gov* or *http://www.epa.gov*, and then Offices and Regions, Office of Solid Waste and Emergency Response, Office of Solid Waste.