



January 24, 2022

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Ms. Carolyn Hoskinson
United States Environment Protection Agency
1200 Pennsylvania Avenue, NW (Mail Code 3204A)
William Jefferson Clinton Bldg Room
Washington, DC 20004

Via Email:

Dear Ms. Hoskinson:

On August 10, 2021, EPA's Office of Resource Conservation and Recovery sent a memo to the Regions outlining options that generators and TSDFs have to address the current backlog of containerized waste needing incineration. The reasons for the memo were:

- Labor shortage (both at the site and in the transportation sector) due to COVID;
- Winter storms that caused shutdowns in the South;
- Shutdowns due to scheduled and unscheduled maintenance; and
- Increased waste generation (due to increased manufacturing).

At that time, the backlog was anticipated to be resolved by the end of March 2022.

The purpose of this communication is to share the status of the current situation and to discuss options for continuing the program if needed.

Some of the commercial incinerator operators do not presently have a backlog but others continue to experience delays in their ability to accept waste shipments due to treatment or storage capacity limitations. With respect to remediation wastes, the winter months are typically slow because of the reduced amount of field work. However, as the weather improves, operators anticipate the demand to grow again, contributing to a potential backlog situation. In addition, no new incinerator capacity is scheduled to come on line for 2-3 years. Consequently, all of the reasons cited for the 2021 extensions are still in play. Labor

shortages based on COVID are still an issue. Winter is not over and waste generation is expected to increase without increased capacity.

While the extensions for generators may not be needed right now to the extent they were in August of 2021, it is difficult to predict how the weather or the COVID pandemic will impact these decisions in the next several months. There appears to be a couple of options available. One is to keep the program in place and allow generators to use it as needed. The second is to stop the program but be prepared to restart it should the need occur. The bottom line is that waste generation is increasing and no new capacity will come on line for 2-3 years. CRWI believes it is prudent to keep the program in place through the summer and allow the regulating authorities to use it as needed.

Please contact me (mel@crwi.org or 704-431-7343) if you have questions.

Sincerely yours,



Melvin E. Keener, Ph.D.
Executive Director

cc: CRWI members
M. Sheridan, EPA
J. Gaines, EPA