

Remediation Waste Management

USWAG will support EPA efforts to minimize regulatory constraints on management of remediation wastes including MGP wastes, contaminated media, solvent and used oil spills. USWAG will also work to minimize the adverse impact of the land ban restriction program on former utility Bevill wastes (e.g. MGP wastes) and Bevill co-processed wastes (e.g. ash from combining hazardous waste with coal).

Polychlorinated Biphenyls (PCBs)

USWAG, working with the Industry PCB Consensus Group, will seek reasonable implementation of the PCB Mega Rule with regard to use, storage, and disposal of PCBs, as well as record keeping and spill cleanup requirements. USWAG also anticipates the promulgation of a final rule regarding the reclassification of electrical equipment in 1999 that will be of interest to the electric utility industry.

Regulation of Fossil Fuel Byproducts

USWAG is working with the Utility Waste Section of EPA in order to secure a non-hazardous regulatory classification for fossil fuel combustion byproducts co-managed with low volume wastes.

Utilization of Coal Combustion Byproducts

USWAG is working to promote the utilization of coal combustion byproducts; advocate the development of standards for the use of such materials; and assist EEI's legislative efforts to secure regulatory programs to achieve these goals.

Management of Treated Wood Poles & Crossarms

USWAG will continue to work with EPA in an effort to avoid the classification of used, pentachlorophenol-treated wood poles and crossarms as hazardous waste. USWAG will utilize data developed by EPRI to demonstrate that the risks associated with management of treated wood products do not warrant hazardous waste controls, and develop an alternate regulatory program for treated wood management.

Hazardous Materials Transportation

USWAG will continue working with DOT's Research and Special Programs Administration to ensure that regulations for the transportation of hazardous materials promote public safety without being unnecessarily burdensome. In that effort, USWAG will work to prevent the 1997 "materials of trade" rule from being undermined by regulatory and legislative challenges. Through participation in a multi-industry coalition, USWAG will support efforts to reform the Hazardous Materials Transportation Act in order to preserve and/or strengthen DOT's ability to preempt OSHA, EPA,

and State/local regulations affecting the transport of hazardous materials.

Spill Prevention Control & Countermeasures (Spcc) Program

USWAG will continue its efforts to reform the SPCC regulations as applied to oil-filled electrical equipment, and to minimize the burdens of compliance with SPCC program requirements on utilities.

Mixed Waste Regulation

USWAG is striving toward resolution of the problems associated with dual regulatory authority of EPA and NRC on the management, storage, handling and disposal of mixed radioactive and hazardous waste.

Used Oil Management

USWAG, through the Used Oil Coalition, will work to uphold EPA's decision to not list used oil destined for recycling as hazardous.

Management of Nonhazardous Utility Wastes

USWAG will assist EPA in the development of: guidelines for management standards for Subtitle D industrial solid waste facilities; groundwater sampling requirements; and proposed amendments to the definition of solid waste.

Superfund and Brownfields Redevelopment

USWAG will continue working with the RCRA Multi-Industry coalition to promote brownfields redevelopment as Congress addresses Superfund reauthorization.

Expansion of TRI Reporting Requirements to Include Coal and Oil- Fired Electric Utilities

USWAG will continue to coordinate with EEI and other industry groups on the Federal Advisory Committee to develop recommendations for modifying some misleading aspects of the TRI reporting form and to identify regulatory options for achieving burden reductions.

Section 129 Clean Air Act Rulemaking

USWAG will coordinate with UARG in order to respond to EPA's proposed rule regarding the definition of the term "solid waste" under Section 129 and the availability and scope of a *de minimis* exemption for solid wastes co-burned with fossil fuels. USWAG will also continue its dialogue with EPA in development of this rulemaking.