

December 14, 2003

VIA ELECTRONICALLY & FACSIMILE

EPA Docket Center (5305T)
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460
Attention: Docket No. RCRA-1999-0031

RE: Comments on RCRA Burden Reduction Initiative;
RCRA-1999-0031; FRL 7580-3 (October 29, 2003)

Dear Sir/Madam:

Please find attached comments of Giant Resource Recovery Company, Inc. on the RCRA Burden Reduction Initiative, RCRA-1999-0031; FRL 7580-3 (October 29, 2003).

Any questions or requests for further information should be directed to the undersigned at (843) 851-5668.

Sincerely,

Stephen P. Holt, PE
Director, Environmental Affairs

Attachment

**COMMENTS OF GIANT RESOURCE RECOVERY COMPANY, INC. ON
RCRA BURDEN REDUCTION INITIATIVE**

RCRA-1999-0031; FRL 7580-3
(October 29, 2003)

Giant Resource Recovery, Inc. (“GRR”) submits the following comments on the Notice of data availability for reducing the recordkeeping and reporting burden imposed on the states, the public and the regulated community under the Subtitle C hazardous waste regulations of the Resource Conservation and Recovery Act (RCRA), in response to the solicitation of the Agency at 68 Fed. Reg. 61662.

Statement of Interest

GRR, a wholly owned subsidiary of Giant Cement Holding, Inc., owns and operates Subtitle C hazardous waste permitted facilities in five (5) states. GRR provides pumpable hazardous waste fuel to cement and lightweight kilns, chiefly solvent based, as the primary fuel at its plants for over twenty-five years.

Response to Information Request

EPA has solicited information on whether the ASTM standard is appropriate; whether the agency made the right choices in determining which certifications must be conducted by qualified professional engineers and whether the agency should modify the certification requirements to allow “qualified professional engineers” instead of “independent, qualified, registered professional engineers.”

GRR is in support of this proposed Notice and supports the change in the regulation to require “qualified professional engineers” to perform the required certifications. GRR further believes that if EPA approves the use of other standards as a requirement for the required certifications, e.g. the ASTM standard, that qualified professional engineers should also be allowed to perform those certifications which may be allowed by any other standard. EPA must continue to allow licensed Professional Engineers to certify in all aspects of the required RCRA certifications.