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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

September 18, 1978

Mr. William Davis
LA/OMA Project
Post Office Box 4998
Whittier, California 90607

Dear Mr. Davis:

In our telephone conversation of September 15, 1978, you asked whether the combustion of municipal sewage sludge would qualify as "municipal solid waste" under the exemption provided in Section IV.B. of the draft changes to EPA's Emission Offset Interpretative Ruling. As defined in the Resource Conservation and Recovery Act, sewage sludge would qualify as solid waste under RCRA and the Interpretative Ruling. Therefore, the project you described would apparently qualify for the exempt under Section IV.B. of the draft changes to the Interpretative Ruling.

Sincerely yours,

D. Kent Berry
Director
Policy Analysis Staff

bcc: Dave Sussman, OSW
Bill Pierce, Region IX, Enforcement Division
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Mike Trutna, CPDD