SUMMARY OF COMMENTS ON:

MANAGEMENT AND DISPOSAL OF LEAD-BASE PAINT DEBRIS; PROPOSED RULE,
and
TEMPORARY SUSPENSION OF TOXICITY CHARACTERISTIC RULE FOR SPECIFIED LEAD-BASED PAINT DEBRIS; PROPOSED RULE

40 CFR PART 745 [OPPTS-62160; FRL-5784-3]
Docket No. F98-LBPD-FFFFF
and
40 CFR PART 260 [FRL-5783-7]
Docket No. F98-LBPD-FFFFF

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DISCLAIMER

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1.0 INTRODUCTION

The U.S. Environmental Protection Agency has proposed a rule (63 FR 70190 and 63 FR 70233, December 18, 1998) under the Toxic Substances Control Act (TSCA, 40 CFR 745) to provide new standards for the management and disposal of lead-based paint (LBP) debris generated by individuals or firms. The Agency has also concomitantly proposed to suspend temporarily the applicability of regulations under Subtitle C of the Resource Conservation and Recovery Act (RCRA) Toxicity Characteristic (TC) Rule (40 CFR 261.24) to debris generated during LBP abatements conducted at target housing; deleading projects conducted at public or commercial buildings; and renovation or remodeling and demolition activities at target housing, public buildings, or commercial buildings.

After the issuance of the proposed rule, the Agency has received more than 40 RCRA-related and more than 200 TSCA-related written comments from the public. In this document, all the comments received are briefly summarized, and categorized. A summary table for the TSCA and RCRA related comments is shown in Appendices A and B, respectively. Source related issues described and summarized in section 2.1. Issues pertaining to the commenter provided data is presented in section 2.2. Issues related the groundwater pathway analyses using the EPA's Model for Leachate Migration with Transformation Products (EPACMTP, U.S.EPA, 1996) are extracted, summarized, and presented in Section 2.3. The remaining issues (economic impact, implementation, and procedure) are addressed in section 2.4. Presented in Section 4 is an analytical plan for the groundwater pathway risk assessment has been developed in order to provide technical basis for the response of the comments and the incorporation of current data.

2.0 COMMENT SUMMARY

The issues raised in the comments may be segregated into five categories:

- Source;
- Groundwater modeling and monitoring;
- Economic impact;
- Implementation; and
- Procedure.

The emphasis of the summary below is on the first two categories which are directly and indirectly related to the groundwater pathway risk assessment.

All the comments received are briefly summarized and all the brief summaries are presented in a tabular form in Appendices A for the TSCA-related and B for the RCRA-related comments, respectively.

2.1 SOURCE-RELATED ISSUES

Source-related issues involve the processes by which lead is leached from waste management units (WMU); and the resulting leachate concentrations which are subsequently used for fate and transport simulation for the groundwater pathway risk assessment. The source-related issues raised by the commenters include:

- Unreliability of leachate concentrations determined by the Synthetic Precipitation Leaching Procedure (SPLP) and Toxicity Characteristic Leaching Procedure (TCLP);
- Lack of definitive conclusion on lead leachability;
- Acidity or pH in MSWLFs is indistinguishable from that in C&DLFs;
- Data submitted suggest near neutral pH;
- Conflicting lead leachability data at or near neutral pH;
- Insufficient analysis of in situ conditions; and
- Lacking of evaluation of actual leachate data.

A list of commenters that raised the source-related issues is provided in Appendix C.

2.1.1 Unreliability of SPLP and TCLP Results

This issue pertains to the assumption that Synthetic Precipitation Leaching Procedure (SPLP) test mimics leaching in a C and D landfill and that Toxicity Characteristic Leaching Procedure (TCLP) test can closely mimic the leaching conditions of a Municipal Solid Waste (MSW) landfill. A number of commenters (e.g., Commenter LPDP-0016, Battery Council International; Commenter C1-0079, Superior Special Services, Inc.) pointed out that, the TCLP test could distort the representation of lead mobility in the environment because:

a) The failure of the TCLP to accurately predict weathering in the landfill environments;
b) The failure of the TCLP to account for the sensitivity of lead to the acetic acid leaching solution; and
c) The failure of the TCLP to accurately predict the attenuation of lead in soil.

Some of the commenters also stated out that the SPLP results may not reflect the true lead leachability either. Although the leached lead concentrations based on the SPLP are one tenth of those based on the TCLP, the acidic content of the SPLP extraction liquid is also one tenth of the TCLP extraction liquid.

It is also pointed out that these tests have not been validated with empirical data and that the Agency is obligated to perform validation tests in its determination of disposal practices.

2.1.2 Lack of definitive conclusion on lead leachability

This issue addresses the composition of leachable lead and therefore the applicability of the TCLP and SPLP testing. Some commenters (e.g., C1-093, Alliance for Safe and Responsible Lead Abatement) stated that most construction and demolition waste contains lead-carbonate-based paint as well as other less leachable lead compounds, such as lead oxide. Lead carbonate is one of the most leachable lead compounds found in paint, eight to ten times more readily leachable than other lead compounds found in paint. An excerpt from a report of the U.S. Army Construction Engineering and Research Laboratory with a plot of leachability of white lead (lead carbonate) versus pH was cited to indicate that leachability of lead carbonate may begin at relatively neutral pHs (circa 7.5-8.0). The unknown nature of the waste to be tested and the highly leachable nature of lead carbonate was cited as a reason to take a more precautionary approach to lead debris disposal.

2.1.3 Acidity or pH in MSWLFs is indistinguishable from C&DLFs

The pH in MSW landfills was compared to the pH of C and D landfills and the acidity of both were found to be similar. This point was presented by several commenters along with sample data. The point was argued that if conditions were similar in both landfills that construction and demolition waste should not be excluded from MSW landfills.

2.1.4 Data submitted suggest near neutral pH

Several commenters presented data on the pH of MSW and C and D landfills. The pH values were

generally close to neutral and no where near the levels of the TCLP and SPLP tests. The pH of leachate was only found to be slightly acidic and only for short periods before returning to a near neutral level.

2.1.5 Conflicting lead leachability at near neutral pH

The pH and lead levels, as measured, of leachate did not indicate that more acidic conditions increase the concentration of lead. In general most of the data reported showed low leachate lead concentrations at or near neutral pH with minor changes with increased acidity (lower pH).

However, data submitted by some commenters suggest that high lead leachability at near neutral pH (a study by USACERL) is possible. An excerpt from a report of the U.S. Army Construction Engineering and Research Laboratory with a plot of leachability of white lead (lead carbonate) versus pH was cited to indicate that leachability of lead carbonate may begin at relatively neutral pHs (circa 7.5-8.0). The unknown nature of the waste to be tested and the highly leachable nature of lead carbonate was cited as a reason to take a more precautionary approach to lead debris disposal.

2.1.6 Insufficient analysis of in situ conditions

The assumption of pH in both the MSW and the C and D landfills is not supported by analysis of in situ conditions. This issue was addressed by citing the literature on the types of decay processes that take place in landfills. The literature cited stated that initial *acidic decay* in landfills occurs at a pH near 5.5 and that *methanogenic decay* occurs at a pH near 7. The argument was made that the pH of the acidic decay was higher (not as acidic) than the assumed pH of both the TCLP and the SPLP. In addition, the period of initial high acidity reverted within months, to near neutrality (C1-213, T. Christensen).

2.1.7 Lacking of evaluation of actual leachate data

Several comments highlighted a lacking in the evaluation of actual leachate data. It was stated that actual pH and lead levels were available to supplement the analytical testing and computer modeling that was performed. Many commented that their leachate data did not support the EPA's conclusions on the conditions in the source.

2.1.8 Other Metals in LBPD

Some commenters (e.g., C1-093, Alliance for Safe and Responsible Lead Abatement) suggested that ..*"many paints contain hazards other than lead such as chromium, barium, mercury, and other contaminants. It is widely known that chromium actually leaches more readily under the SPLP leaching conditions than lead. This fact has not been considered in the formulation of this regulation.."*.

2.2 COMMENTER-PROVIDED DATA

Many commenters provided data along with their comments. The amount and quality of the data ranged from anecdotal to years worth of lead and pH leachate lab results. Much of the data presented was in

summary form and had been averaged over varying time periods. The averaging and/or filtering of the leachate data could introduce bias by not reflecting the more extreme pH values observed in the literature or in the field data. The commenter-provided data may be segregated into categories based on data type. The data categories are: TCLP, SPLP, pH, leachate (lead), and other. Table 1 summarizes the amounts and types of commenter provided of data. A qualitative summary of the MSW and C&D landfill data provided by commenters is tabulated in Appendices H and I.

Table 1. Amounts of Commenter Provided Data by Category

	TCLP	SPLP	pH	Leachate	Other
Qualitative	2	0	6	4	0
Values	2	1	23	13	7
Database	0	0	6	7	0
Figures	1	1	3	3	0

Although a number of commenters provided data there are some issues that need to be addressed prior to incorporating it into the database. These issues include:

- various levels of precision and data quality,
- limited amount of data,
- data may be confined to a few geographical regions,
- short and varying observation periods,
- no QA/AC (high concentrations of lead or acidic pH values may have been omitted),
- sample locations are largely unknown,
- commenter data may introduce unknown bias int the existing database, and
- commenter provided data may already be included in the database.

Of all the data provided only eight contained information pertaining specifically to C&D landfills. Most of the data provided was in the form of a value range, while two commenters provided a series of C&D lead and pH leachate sampling results. A breakdown summary of the commenter provided C&D data is presented in Table 2.

Table 2. Commenter provided lead leachate data pertaining to C&D landfills

Type of C&D Data	#	Commenter ID
Database	2	C1-027, Massachusetts Dep. Of Env. Protection C1-151, NY Dep. of Env. Conservation
Value	4	C1-053, Taylor Recycling Facility C1-113, Municipality of Anchorage SW Services C1-152, Wood Recycling, Inc. C1-153, Pima-Maricopa Indian Community, AZ
Figure	1	C1-073, National SW Management Association
Other (missing but quoted)	1	C1-122, Waste Management Inc.

2.3 GROUNDWATER MONITORING AND MODELING

Groundwater monitoring- and modeling-related issues involve the fate and transport simulation of lead in the groundwater pathway. Comments are included in this category may directly mention groundwater modeling or indirectly implied groundwater modeling, such as "*... the EPA's analysis of groundwater pathway*" or "*the migration of leachate with lead*". Comments pertaining to groundwater monitoring were included in this category because of their influence on modeling. The groundwater monitoring/modeling-related issues raised by the commenters include:

- Modeling results for C&D LF's are similar to those for MSWLF's (Argument for disposal in MSWLF's) (C1-019, State of Illinois)
- Support of groundwater modeling (C1-041, New York Department of Health)
- Lack of definitive conclusion on lead mobility
- Insufficient analysis of in situ conditions (C1-025, City of Grand Island Nebraska)
- Inclusion of other metals in the analysis
- Groundwater monitoring evidence suggests no serious lead contamination problems due to the disposal of lead
- Modeling analysis for C&D have many uncertainties
- Lacking of evaluation of actual leachate data to provide source data for modeling (C1-115, State of Vermont)
- DAF may as high as 5000 not 100

- Data invalidates EPA's assumptions on pH and therefore fate and transport modeling (C1-213, Browning-Ferris Industries)

- Modeling should be done on a region specific basis

A summary table of groundwater modeling and monitoring related comments is provided in Appendix D.

2.3.1 Modeling results for C&D LFs are similar to those for MSWLFs

This issue was raised by commenters addressing the validity of SPLP test ability to mimic the leaching from a C&D LF where LBPD containing wood pieces are likely to generate a much more acidic leachate than acid rain (as in the SPLP test). The commenters propose that a more appropriate modeling regime would be to use the TCLP test and leach data to determine the source conditions. To support this argument the commenters cited the modeling included in the proposal that indicate that the groundwater risks, from LBPD, in MSW LF's are quite similar to those for C&D LFs. It was stated that this modeling supports the argument that if LBPD is allowed in C&D LFs, it should also be allowed in MSW LFs.

2.3.2 Support of groundwater modeling

Commenters who supported the adoption of the proposed rule cited the EPAs modeling that indicates that the leaching of lead from LFs to groundwater would be very low.

2.3.3 Lack of definitive conclusion on lead mobility

This issue regards the proposed rule's position that the low pH environment in a MSW LF contributes to the release and mobilization of lead from lead-based wastes. Several commenters provided leachate pH and lead levels that do not show a correlation between the lead levels and pH in MSW LFs. Commenters provided data from leachate sampling shown lead levels with pH values of between 6 and 7. The assumption of low pH greatly skews the availability of lead to be transported out of the landfill.

This issue was also addressed by commenters who stated that there are various compounds and isotopes of lead used in paint (as well as in other waste streams) entering the MSW LFs have different solubility characteristics.

Other commenters cited studies (McCulley, Frick & Gilman, 1991) that found soils to have a strong absorption affinity for lead, therefore, soils appear to have large capacities for immobilization of lead. *"....except under rare conditions, lead that infiltrates into the subsurface is immobilized and accumulates in the upper layers of soil. This fate is confirmed by experimental and empirical data"*.

2.3.4 Insufficient analysis of in situ conditions

This issue is similar to the previous issue in that it stems from the assumptions of source conditions pertaining to the acidity of MSW and C&D landfills. However, this issue focuses on the degradation process taking place in the landfill. There were two main types of decay mentioned; acidic, and methanogenic. The acidic

decay takes place first and is generally short-lived. This decay process usually produces leachate with pH in the range of 5 to 6 and not as low as those of the TCLP and SPLP tests. Methanogenic decay produces leachate in the neutral range. It was stated that most MSW landfills produced a considerable amount of methane and therefore should not have acidic leachate. The TCLP and SPLP assumptions of low pH over the life of the landfill is grossly incorrect.

Commenters cited work by Frederick Pohlard (1993), and by Chian and DeWalle (1977) that described conditions and processes in landfills. For example, these works did not support the assumptions of the proposed rule and disputed the amount of lead that is available for transport (see section 2.2.3).

2.3.5 Inclusion of other metals/chemical in the analysis

Several commenters brought up issues concerning other metals in the waste stream that may affect groundwater quality. The argument was made that C&D waste should not be excluded from MSW landfills and placed into C&D landfills based on the stability of lead only. It was pointed out that other metals from paint may also be present, such as chromium or silver. Chromated copper arsenate can be released from pressure treated lumber. Varnishes and stains from cabinets, bookshelves etc. can also pose potential contamination as these wood-based materials decompose.

2.3.6 Groundwater monitoring evidence suggests no serious lead contamination problems due to the disposal of lead

Many commenters provided results of leachate testing from MSW landfills that did not indicate a serious lead contamination problem. Commenters used the leachate sample results showing little or no lead contamination in their argument against the exclusion of C&D wastes from MSW landfills which are required to have liners and leachate recovery system. Commenters also used this issue to make the argument that there is not a problem with lead contamination migrating out of MSW landfills and therefore, the proposed rules are un-necessary and overly burdensome.

2.3.7 Modeling analysis for C&D have many uncertainties

The issues of modeling uncertainties was raised by two commenters (C1-031, National Lead Assessment and Abatement Council and C1-106, New Jersey Department of Community Affairs) in a very general manner.

"Like any other modeling analyses, the modeling analyses conducted on the disposal of lead-based paint debris in C&D landfills have many uncertainties".

The comments were nearly identical and both were making arguments for engineering design criteria and engineering controls. Controls suggested included, liner, leachate collection, and groundwater monitoring systems.

2.3.8 Lacking of evaluation of actual leachate data to provide source data for modeling

This issue was raised by commenters who stated their belief that the prohibition against LBP debris in MSW landfills is misguided. They acknowledge that lead is more mobile in a more acidic environment but

they question the assumption that the TCLP test mimics MSW landfill leachate and that the SPLP test mimics the C&D landfill leachate. They cite the proposed rule preamble to highlight shortcomings in the evaluation of actual leachate data to supplement the analytical testing and computer modeling that was performed.

2.3.9 DAF may be as high as 5000 not 100

This issue arose from an argument that the proposed rule is based on an invalid standard for lead toxicity. The commenters contend that the EPA is avoiding reforming the TCLP by making a series of complicated analysis of the leachability and migration of various types of lead-based paint debris. To support this statement the commenters cite an observation from the HWIR proceeding that stated *"the TCLP dilution and attenuation factor(DAF) of 100 used iin the TCLP could correctly be as high as 5000"* (C1-201, Lead Industries Association, Inc.). It was stated that if this were the case the permissible lead TC values should be 50 times higher that the TCLP estimates.

2.3.10 Data invalidates EPA's assumptions on pH and therefore fate and transport modeling

Many commenters made statements that alluded to the idea that the proposed rule is fatally flawed because it is based on poor scientific underpinnings. Specifically, the underlying pH assumptions and modeling results are not supported by the great preponderance of empirical leachate and groundwater monitoring data from MSW landfills. Many commenters provided leachate lead and pH sample results. A particular commenter (C1-213, Browning-Ferris Industries) specifically stated this issue as:

"The rule relies on flawed assumptions regarding the pH of MSW landfills that, in turn, cause the Agency's fate and transport models, along with the TCLP procedure, to churn out the patently incorrect outcome that MSW landfills are inappropriate for LBP debris disposal compared to C&D landfills".

2.3.11 Modeling should be performed on a regional basis

This issue was raised by commenters who operated MSW landfill is the southwest and arid regions. They claim that the leaching conditions in wetter areas does not represent the conditions that they observe at their sites. Therefore, analysis based on a large infiltration should not be used when regulating their arid sites.

2.4 Other Issues

2.4.1 Economic Impact

The issue of economic impact was the most common issue raised by commenters. The issue of economic impact, as the title implies, addresses concerns that are financial in nature. It was addressed by commenters directly stating the economic impact or by implying a hardship. A summary table of economic impact related comments is provided in Appendix E. The comments concerning economic impact were segregated

into the following categories:

- loss of revenue to the recycling of used building material industry by diverting demolition waste streams to C & D landfills,
- costs associated with the increased filling rate of landfills due to diversion of C&D recycling waste streams,
- costs associated with the increased costs of trucking of wastes to a C & D facility instead of the MSWLF,
- costs associated with the shortage of C&D landfills,
- costs of testing and sorting incoming wastes,
- costs associated with enforcing the proposed rule,
- costs associated with the possible increase in illegal dumping of C&D waste due to increase in regulation and costs of disposal

2.4.2 Implementation

The issue code of Implementation was assigned to comments which raised issues dealing with the wording, inclusions, exclusions, or non-technical issues pertaining to the implementation of the rule. This category has a great deal of overlap with other issues. For example, the prohibition of C and D wastes in MSWLF's would be categorized under implementation but it may also have an economic impact. A summary table of implementation related comments is provided in Appendix F. Implementation related issues include:

- the shortage of C&D LFs, disposal in C and D waste should be allowed in MSWLF's. Many commenters voiced their concern over the prohibition of the municipal solid waste landfills (MSWLFs) as a disposal option. From their point of view, the basis of prohibition does not take into account of the current operation of Part 258 MSW LFs which are double-lined with leachate collection systems, and have stringent design, operation, and monitoring requirements. While State requirements may vary, the requirements for the design, construction, operation, and monitoring of the construction and demolition landfills (C&D LFs), on the other hand, may be not as stringent as those for the MSWLFs. In many cases, C&D LFs are unlined, and therefore affording less protection than the MSWLFs.
- implementation of liners and control for C&D landfills,
- implementation of a minimum engineering criteria for C&D landfills,
- exclusion of some wastes, and

- the incorporation lead-bearing soil.

2.4.3 Procedure

The Procedure issue code was assigned to comments that had to do with the commenting and review procedure. A summary table of procedure related comments is provided in Appendix G. These comments included:

- the request for an extension of time to comment
- complaints about the solicitation of comments

3.0 JUSTIFICATION OF ADDITIONAL MODELING ANALYSIS

The need to preform a re-analysis of the groundwater pathway and modeling stem from two main issues. The first issue is the availability of additional data in databases, and more sophisticated modeles since the original modeling was performed and the second issue is to address the concerns raised by commenters.

The first issue encompasses the following:

- availability of additional data in the databases,
- availability of new MINTEQ isotherms, and
- new development in uncertainty analysis methodology.

Issues raised by commenters requiring modeling re-analysis include:

- resolution and formulation of source conditions,
- incorporation of leachate data provided by commenters,
- incorporation of specific operational conditions (liners with leachate recovery system and controlled heads), and
- perform modeling on a regional basis.

An analytical plan has been developed to address the issues above and is presented in the following section.

4.0 ANALYTICAL PLAN

4.1 Develop New Lead Isotherms

Since the groundwater fate and transport modeling in support of the LBPD rule proposal had been conducted, more information relating to the development of lead isotherms became available. The new information include:

- Improved thermodynamic database,
- Expanded database of hydrous ferric oxide, and
- Expanded database of metal-organic matter reactions.

A new set of isotherms for lead has been recently derived (USEPA, 1999). Based on the preliminary results with the new isotherms the risk is approximately one order of magnitude greater. Therefore, subsequent modeling runs should incorporate the newly-derived isotherms.

4.1.1 Incorporation of other metals in the analyses.

Other metals that are present in C&D wastes may be incorporated into the risk analyses of the proposed rule. The improved database should include the additional metals

4.2 Determine New Leachate concentration distributions

Conditions of the source in both landfill types may need to be re-evaluated based on information provided by the commenters. There was a great deal of leachate pH and lead concentration data provided. It may be necessary to evaluate commenter data and incorporate it into distributions used in the modeling process.

4.3 Determine Operational Conditions

Operational conditions of both landfill types needs to be addressed. This may include the effects of the liner and leachate recovery systems (MSW landfills have a liner and hydraulic head are maintained at or below 1 ft.).

4.4 Examine the Source Formulation

The existing source scenarios need to be examined to determine the applicability of the current modeling approach. Conditions of the source may change, based on issues raised by commenters.

4.4.1 Re-formulate modeling approach based on modified source conditions.

In the event that new source conditions are determined it will be necessary to re-formulate the modeling approach.

4.5 Execution of New Modeling Runs

Given new source conditions, metal isotherms, modified databases and distributions, and a revised modeling approach, new modeling run need to be performed.

4.5.1 Determination of Stability

After the new runs are completed the results need to be analyzed and the stability of the results needs to be determined.

4.5.2 Determination of uncertainty

Provided that information relaying to uncertainties due to model, sampling, and measurement errors is available, the confidence intervals will be determined using a two-loop Monte-Carlo methodology.

4.5.3 Documentation of Results

Once the runs are complete and stability of the results is determined, documentation of the process needs to be produced and QA /QC performed.

5.0 REFERENCES

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Pohland, F. G., et al, Metal Specification and Mobility as Influenced by Landfill Disposal Practices, Metals in Groundwater, Lewis Publishers, Chapter 12, pp 411-429, 1993.

USEPA, EPA'S Composite Model for Leachate Migration With Transformation Products, EPACMTP: Background Document for Metals Transport in the Subsurface, Volume 2: Sorption Isotherms, USEPA Office of Solid Waste, Washington DC, 1999.

APPENDIX A. All TSCA Comments

Comments on Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris, TSCA					
Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-001	SRC, IMP, RCRA	dispute effect of LBPCD in MSW. impact on rural communities not considered. impact of procedure oppressive.	Kansas Dep of Health and Env	none	
C1-002	IMP, RCRA, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure	ME DEP	none	
C1-003	PROC	request for review extension.	National Association of Demolition Contractors	none	
C1-004	PROC	request for review extension	Association of State and Territorial Solid Waste Management Officials	none	
C1-005	PROC	request for review extension	Utility Solid Waste Activity Group	none	
C1-006	PROC	request for review extension	The Alliance of Safe and Responsible Lead Abatement	none	
C1-007	EI	effect on the reuse/salvage industry	DOD	none	
C1-008	PROC	request for review extension	Sec. Of Def	none	
C1-009	PROC	request for review extension	Utility Solid Waste Activity Group	none	
C1-010	IMP	implementation of procedure	Utility Solid Waste Activity Group	none	
C1-011	PROC	request for review extension	BFI	none	
C1-012	IMP, EI	economic impact on Islands	County of Maui	none	
C1-013	IMP	argument for the use of liners and control mechanism. questions implementation and procedure	R. Wardwell Geotech and GW Engineer	none	
C1-014	IMP, TCLP	argument for the use of control mechanism. questions implementation and procedure	Fort Ord Reuse Authority	none	
C1-015	IMP, RCRA	pro and con (support) of implementation	Alliance to End Childhood Lead Poisoning	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

C1-016	IMP, TCLP	shortage of C and D landfills	Douglas County (NE) Env. Serv.	yes	TCLP test results of leachate show no detectable levels of lead. No quantifiable levels or dates given.
C1-017	IMP, EI	shortage of C and D landfills. economic impact	North East Nebraska Solid Waste Coalition	none	
C1-018	EI	development of affordable housing	Share Associates	none	
C1-019	IMP, SRC, SPLP, GW Modeling, RCRA, TCLP	shortage of C and D landfills, implementation	State of Illinois	none	
C1-020	PROC	request for review extension	Pollution Prevention and Toxics USEPA	none	
C1-021	EI, RCRA	economic impact of implementation. shortage of C and D landfills	State of Iowa	none	
C1-022	EI, TSCA, RCRA	economic impact of implementation. shortage of C and D landfills	National Association of Home Builders	none	
C1-023	EI, IMP	effect on the reuse/salvage industry	DeConstruction Services	none	
C1-024	IMP, EI	request for disposal in subtitle D landfills only	DNR(DEQ) MO	yes	pH = 6.3 to 7.3. No quantative number of samples or dates given
C1-025	GW, TCLP, SPLP	Insufficient GW research/modeling/analysis, TCLP and SPLP based on assumptions that are unsupported in actual landfill conditions	City of Grand Island Nebraska	none	
C1-027	GWM,	MSWLF and C and D LF are built an d operated in accordance with the same regulations, therefore LBPD should not be excluded from MSWLFs.	Massachusetts Dep. Of Env. Pro.	yes	Pb levels from multiple well locations at multiple sites (up gradient and down gradient) spanning several years
C1-028	SRC	Acidic nature of leachate could not be used as justification for not allowing LBP in MSWLF as the organic nature of C and D will contribute to the acidic content of the LF	Oklahoma DEQ	none	
C1-029	EI, IMP	effect on the reuse/salvage industry	Pueblo Depot Activity Development Authority	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks

C1-030	TCLP	ADEQ concurs with proposed regulation, provided that lf standards are met. Concerned that the there may be a higher rate of lead leaching from C and D LF due to lack of a liner system	Arizona DEQ	none	
C1-031	GW Modeling,	the modeling analysis conducted for C and D LF have many uncertainties, therefore, there should be some minimum engineering criteria for C and D LFs	National Lead Assessment and Abatement Council	none	
C1-032	EI	effect on the reuse/salvage industry	DeConstruction Services	none	
C1-033	EI	effect on the reuse/salvage industry. quicker action.	Just a Start Corp	none	
C1-034	TCLP	TCLP is expensive and there is no standard testing methodology	Nuprecon	none	
C1-035	SRC, TSCA, RCRA	Geographic factors should be considered in the regulatory process. The arid regions produce less organic leachate. The implementation under TSCA affects RCRA facilities thus fragmenting existing programs.	Wyoming DEQ	none	
C1-036	GW Modeling, RCRA, TSCA	support of regulation and EPA GW modeling	NY DOH	none	
C1-037	EI	effect on the reuse/salvage industry	Habitat for Humanity	none	
C1-038	IMP	clarification of definitions	NC Dep Heath and Human Services	none	
C1-039	SUP, TCLP	support of regulation	Island Demo Inc	none	
C1-040	EI,	effect on the reuse/salvage industry. quicker action.	The ReBuilding Center	none	
C1-041	TSCA, RCRA, GW modeling	support of regulation	New York Dep of Health	none	
C1-042	EI	effect on the reuse/salvage industry. quicker action.	Dave Acherman	none	
C1-043	IMP, SRC	opposed to the regulation. Comments on sources of LPB in Poisoning of children	Washington Poison Center	none	
C1-044	IMP	opposed to the regulation. clarification of rules	Raymond Fahey	none	
C1-045	IMP	implementation of procedure	Road Island DOH/DEM	yes	dust and soil is responsible for levels in excess of 10 ug/dL
C1-046	TSCA, RCRA, GW modeling	GW modeling indicates that leachate concentrations should be very low. Support of regulation	New York Dep of Health	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-047	IMP	implementation of procedure	Road Island DEM	none	

C1-048	IMP, EI	support of regulation, added exclusions	City of Cambridge	none	
C1-049	EI	effect on the reuse/salvage industry. quicker action.	Portland OR Metro Regional Gov	none	
C1-050	EI	effect on the reuse/salvage industry. quicker action.	Construction Recycling Systems, Inc	none	
C1-051	EI, IMP, TSCA, RCRA	implementation of procedure	Ford Motor Company	none	
C1-052	SRC	several arguments why LBPD should be accepted in MSWLFs	Monterey Regional Waste Management District	yes	pH = 6.1 to 6.8 from 35 samples over a 3 year period
C1-053	TCLP	Recycling waste does not show signs of Pb.	Taylor Recycling Facility	yes	TCLP results of 1.0 and 0.005 mg/L
C1-054	SRC	source conditions observed are not "highly" acidic	Michigan DEQ	yes	49 of 52 mean pH of 7.02, low of 5.8, high of 7.4
C1-055	IMP, EI	arguments against the exclusion of C and D waste in MSWLF	Town of Colonie, NY	none	
C1-056	TCLP, RCRA, EI	effect on the reuse/salvage industry	National Association of Demolition Contractors	none	
C1-057	SRC,	argument for the use of liners and control mechanism. questions implementation and procedure	Frederick MD DPW	yes	Leachate lab test results of ND , 0.0015 mg/L with a pH of 6.32
C1-058	missing				
C1-059	SUP	support	Kaibab Band of Paiute Indians	none	
C1-060	EI, TSCA, RCRA	economic impact of implementation. shortage of C and D landfills	Missouri Chapter of Solid Waste Association of North America	none	
C1-061	EI, TCLP, GW Modeling	economic impact of implementation . Suggest that GW modeling supports the possibility of contamination of down-gradient drinking wells is remote	MidAmerician Energy	none	
C1-062	EI, SRC	economic impact of implementation. Condition in MSWLF are not "highly" acidic	Randazzo Ent. Inc	yes	pH from lined landfills is 6.1 to 6.8
C1-063	EI, TCLP	effect on the reuse/salvage / transport industry	Jet-A-Way, Inc.	none	
C1-064	SUP, TCLP, RCRA, EI	support of regulation, added exclusions, economic impact	National Center for Lead-Safe Housing	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-065	EI	effect on the reuse/salvage industry	Ciminelli Services Corp.	none	
C1-066	EI	economic impact of implementation on islands	County of Kauai HI	none	

C1-067	EI, GW Modeling	oppose the exclusion of LPBCD in MSW	State of Colorado HM/WM	none	
C1-068	EI, IMP	effect on the reuse/salvage / transport industry	Construction Materials Recycling Association	none	
C1-069	EI, SRC	opposed to the regulation. Arguments for allowing LBP in MSWLF.	Harrison County Solid Waste Authority WV	none	
C1-070	IMP, TCLP, GW Monitoring	economic impact of implementation and exclusion of LBP in MSWLF. shortage of C and D landfills	State of Nebraska	yes	pH of leachate in the range of 6-7 from MSWLF owner/Operators
C1-071	OPP	argument for the use of liners and control mechanism.	unknown	yes	anecdotal: lead is not a major problem in LF leachate
C1-072	EI, IMP	effect on the reuse/salvage industry	Saturday Construction Salvage	none	
C1-073	EI, SRC, SPLP, TCLP	effect on the private MSW industry. Erroneous assumption of acidic leachate and TCLP	National Solid Wastes Management Association	yes	pH = 6.94 from 13 MSWLF and 138 samples. pH of 7 from C and D LFs. Correlation plots of pH and Pb, pH and LF type
C1-074	EI, SRC, RCRA, TSCA, TCLP	effect on the MSW operation. Erroneous assumption of acidic leachate and TCLP	County of San Jouquin	yes	pH = 6.4 from 25 samples over four years with a low of 6.0 and a high of 7.3
C1-075	EI	effect on the reuse/salvage / transport industry	California Bio-Mass, Inc	none	
C1-076	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	
C1-077	EI	effect on the reuse/salvage industry	The Environmental Information Association	none	
C1-078	EI, IMP	economic impact of implementation. shortage of C and D landfills	South Carolina DoH/EC	yes	Levels of lead tests used that trigger action (Total Lead > 0.06% or X-ray Fluorescence of >0.7 mg/cm^2
C1-079	SRC, IMP, SPLP, TCLP	dispute effect of LBPCD in MSW.	Superior Services	yes	several pH and Pb test results from 1994 to 1998
C1-080	IMP	argument for the use of liners and control mechanism. questions implementation and procedure	Florida, Orange County Solid Waste Management	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-081	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Maryland's Solid Waste Program	none	
C1-082	IMP	set stricter reporting limits. Cancer survivor	Kathy Grimes	none	
C1-083	EI	effect on the reuse/salvage industry	L. Schaller, M. Armstrong	none	
C1-084	EI	effect on the reuse/salvage industry	Edgerton Contractors Inc.	none	

C1-085	EI, GW Monitoring, SRC, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills	General Motors	none	
C1-086	EI, IMP	utilities provider seeking exemption	Texas Utilities Services	none	
C1-087	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	UT Davis County Solid Waste Management	none	
C1-088	IMP, SRC, TCLP	argument for the use of liners and control mechanism. questions implementation and procedure	American Forest and Paper Association	none	
C1-089	EI	effect on the reuse/salvage industry	Global Waste Recycling Inc.	none	
C1-090	IMP, TSCA, GW analysis	implementation of procedure	Rouse Company	none	
C1-091	EI, IMP	implementation of procedure, argument against excluding LBP from MSWLF, questions of economic impact, flexibility, recycling, and contradictions	NJ DEP	yes	pH near neutral
C1-092	IMP, EI, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Solid Waste Association of North America	yes	pH = 6.1 to 6.8 from 35 samples over a 3 year period
C1-093	GW Modeling, SRC, IMP, RCRA, TCLP	arguments against enactment, Conflicts with RCRA,	Alliance for Safe and Responsible Lead Abatement	yes	Bar plot of Leachable Pb vs pH. TCLP results of Pb = 54.26(units?), 22.0 ppm, 130 ppm
C1-094	IMP, SRC, TCLP	electric utility seeking exemption	South Carolina Electric And Gas Company	none	
C1-095	IMP, TSCA, RCRA	review of regulation, specific clarification of text, Naturally acidic source conditions	AK DEQ	none	
C1-096	IMP, SRC, GW Modeling, GW analysis	review of regulation	US Dep. Of Housing and Urban Development	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-097	EI, SRC	effect on the reuse/salvage industry. Concrete crushing and recycling for use in road beds	anonymous	none	
C1-098	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure. Liming technique used in daily cover to buffer pH	NJ Middlesex County Utilities Authority	none	
C1-099	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	TN Dep of Env. And Conservation	none	

C1-100	IMP, TCLP	comments and clarification TCLP procedure is unclear and difficult and results are not reproducible	CT DPH	none	
C1-101	EI, IMP	effect on the reuse/salvage industry	Continental Biomass Industries	none	
C1-102	IMP, SRC, EI, TSCA, RCRA	comments and clarification of the provisions. Arguments for the effectiveness of liners and leachate recovery systems	CT DEP	none	
C1-103	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills, pH conditions inside the LF	Development Authority of the North Country, Rodman NY	yes	pH = 6.73 current average for all facilities
C1-104	EI	effect on the reuse/salvage industry, wastes that come from natural disasters	J. Edwards and Associates, Inc	none	
C1-105	IMP, SRC, EI, TSCA	comments and clarification of the provisions. The fate of demolition of buildings with LBP	G.E.	none	
C1-106	GW Modeling, IMP	comments on modeling uncertainties	NJ Dep of Community Affairs	none	
C1-107	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	CH2MHILL / SWANA	none	
C1-108	EI, SRC	municipality seeking exemption. Arid conditions affect the source	City of Bolder NV	none	
C1-109	EI, GW Analysis, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	NV Division of Environmental Protection	none	
C1-110	EI	effect on the reuse/salvage industry. Concrete crushing and recycling for use in road beds	B And H Sales Corp.	none	
C1-111	EI, IMP, SRC, TCLP, RCRA	argument for the use of liners and control mechanism. questions implementation and procedure. Impact on recycling	Kings County WA	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-112	SUP	letter of support	City of Cincinnati	none	
C1-113	EI, GW Monitoring, SRC, RCRA, TCLP	economic impact of implementation. shortage of C and D landfills	Municipality of Anchorage Solid Waste Services	yes	Lead leachate has been: ND 27.4%, exceeded EPA standards 8.3% in the past 11 years. Max Pb 0.1090mg/L
C1-114	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills argument for the use of liners and control mechanism.	Kern County Waste Management Dep, CA	none	

C1-115	EI, IMP, SRC, GW Modeling, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	State of Vermont	yes	data from 1992 to 1999. 74% (63) of samples were ND, 11% (9) were above DL but below MCL, 15% (13) were above MCL. pH generally between 6 - 7
C1-116	EI, IMP, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	US EPA Region 1	none	
C1-117	EI, SRC, RCRA	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	Nebraska DEQ	none	
C1-118	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills	Solid Waste Association of North America, Nebraska	yes	Plot of pH, Pb concentration vs time for a 750 TPD MSWLF operating since 1989
C1-119	EI, SRC, TCLP, SPLP	economic impact of implementation. shortage of C and D landfills	City of York, Nebraska	none	
C1-120	missing pages	missing pages	Utility Solid Waste Activity Group, USWAG	none	
C1-121	missing pages, SRC, TSCA, RCRA, TCLP	missing pages	Battery Council International	yes	results from TCLP of 26 and 20 (units?) and from the same samples using SPLP of 0.11 and 0.14(units?)
C1-122	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation	WasteManagement	yes	missing leachate report
C1-123	EI, GW Monitoring, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, source conditions don't support TCLP assumptions	NH DES	yes	pH in the range of 6-7, tabular form of pH and Pb concentrations for four MSWLFs
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-124	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation, LBP in MSWLFs does not constitute an exposure pathway for children	Association of State and Territorial Solid Waste Management Officials	yes	pH in the range of 6-7
C1-125	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Association of State and Territorial Solid Waste Management Officials	none	
C1-126	EI, IMP, SRC, RCRA	US Post Office seeking exemption to regulations	US Post Office	none	

C1-127	IMP, TSCA, RCRA	arguments of jurisdiction	Reliant Energy, Houston Industries Incorporated	none	
C1-128	IMP, SRC, EI, TSCA, RCRA, TCLP	electric utilities should be exempt,arguments of validity of TCLP and source assumptions	Pacific Gas and Electric	none	
C1-129	SRC, GW Monitoring, GW Modeling	opposed to the exclusion of C and D waste in MSW	Ohio EPA	yes	pH = 6.11 to 8.15, Pb = 3ug/L to 181 ug/L, Tabulated results.
C1-130	EI	effect on the reuse/salvage industry	Global Waste Recycling Inc.	yes	two articles on the benefits of recycling
C1-131	EI, SRC, GW Monitoring, IMP	arguments against enactment, question the adequacy of EPA studies	OR DHR	none	
C1-132	IMP, SRC, EI, TSCA, TCLP	electric utilities should be exempt	Public Service Electric and Gas Company	none	
C1-133	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Solid Waste Association of North America, Alaska	yes	Citing from EPA Factbook as to the total amount of Pb in MSW
C1-134	EI, SRC	economic impact of implementation	County of Fresno	none	
C1-135	SRC, IMP, DTSC	arguments of source definitions, LBP structures are not considered hazardous waste as per DTSC	NorCal Waste Systems, INC.	none	
C1-136	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry. General attack on the science	Rodchester Environmental Park	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-137	EI, GW Monitoring, SRC	economic impact of implementation. Questions the science of regulation	Snohomish County, WA	yes	pH of 6.6 in leachate
C1-138	EI	economic impact of implementation. shortage of C and D landfills	Kenai Peninsula Burough Solid Waste Dep	none	
C1-139	EI	effect on the reuse/salvage industry	Community Recycling and Resource Recovery, Inc.	none	
C1-140	GW Monitoring	opposed to the exclusion of C and D waste in MSW	The Prince George's County , Dep of Env. Rec	yes	Pb from 0.015 to 0.053 ppm, pH 6.5 - 7
C1-141	EI, GW Monitoring	economic impact of implementation. shortage of C and D landfills	County of Sonoma	yes	"Testing results of our leachate indicate that the pH is neutral ……"

C1-142	EI, SRC, RCRA, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, natural alkalinity of soil	Clark County, NV	none	
C1-143	EI, SRC	Economic impact due to lack of C and D landfills, impact on the reuse/recycling community	L. R. Higgins, Inc	none	
C1-144	EI, SRC, GW Monitoring, IMP, TCLP	arguments for changes to the implementation, more state control, analysis ignored the function of liners	Florida Dep of Env. Protection	yes	pH typically 4.7 to 7.7. Methane producing phase produces pH of 6.3 to 8.8. HELP model results and lab results in a table format
C1-145	EI, SRC, GW Monitoring, GW Modeling, IMP, TSCA, TCLP	DOE seeking to address low level radio active LBP wastes, compliance and implementation comments	DoE	none	
C1-146	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills	County of Santa Barbra, Public Works	yes	Pb in monitoring wells closest to LF 12 ppb
C1-147	SRC, GW Monitoring, TCLP, SPLP	arguments against the implementation because of questions of the source conditions	Des Moines County Regional Solid Waste Commission	yes	pH usually 7.5 to 8.7, lowest 7.0, highest 8.8
C1-148	EI, SRC	effect on the reuse/salvage industry	Washington State Recycling Association	none	
C1-149	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Environmental Services Joint Powers Authority	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-150	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	County Sanitation Districts of Los Angles County	yes	Pb = 0.06, 0.03, 0.05 mg/L, pH 6.31 - 8.39 median 7.49. Monthly pH and Pb results from 1990 tho 1996 for two LFs
C1-151	EI, SRC, GW Monitoring, RCRA, TSCA	clarification of technical issues. Exclusion of C and D waste from MSW landfills	NY Dep of Env Conservation	yes	Leachate quality data from several MSW and C and D LFs in table form
C1-152	EI, SRC	effect on the reuse/salvage industry	Wood Recycling, Inc.	yes	Pb content of hydromulch (recycled wood product) 0.306 mg/L
C1-153	EI, SRC, GW Monitoring, TCLP	argument for the use of liners and control mechanism	Pima-Maricopa Indian Community, Salt River AZ	yes	1 out of 14 samples tested for Pb at 0.052 mg/L
C1-154	EI, GW Monitoring	economic impact of implementation. shortage of C and D landfills	County of Sonoma, Dep of Trans and Public Works	none	

C1-155	EI, SRC, TCLP	effect on the reuse/salvage industry	Western Recycling, Inc.	none	
C1-156	EI, SRC	effect on the reuse/salvage industry	Specialty Crushing, Inc.	none	
C1-157	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt, arguments of validity of TCLP and source assumptions, impact of catastrophic events	Pacific Gas and Electric	none	
C1-158	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	University of CA Santa Cruz	none	
C1-159	EI, SRC	effect on the reuse/salvage industry	Eagle Crusher Company of Galion	none	
C1-160	EI, SRC	effect on the reuse/salvage industry	American Waste Industries	none	
C1-161	missing	Cover letter does not match the contents	Solid Waste Association of North America, CA Dep of Health Services		
C1-162	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, soil conditions in arid regions	City of San Diego, Env Services Dep	yes	pH ranged from 6.5 to 7.6, Pb of 0.14
C1-163	EI, SRC	effect on the reuse/salvage industry	Reuse Development Orginazaton, NY Office of Recycling Market Development	none	
C1-164	copy of C162	copy of C1-162	City of San Diego, Env Services Dep	yes	copy of C1-162
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-165	EI, SRC, GW Monitoring	copy of C1-150	County Sanitation Districts of Los Angles County	yes	copy of C1-150
C1-166	IMP, TCLP	arguments about the effects / complications of implementation	OR Dep. Of Env. Quality	none	
C1-167	EI, SRC, GW Monitoring, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, question the validity of assumptions in TCLP	City of Tuscon Solid Waste Management Dep	yes	Sampling of leachate typically shows pH of 6.8 with a low of 6.54, Pb = 0.016 mg/L
C1-168	missing				
C1-169	EI, IMP, SRC, RCRA	Copy of C1-126	US Post Office	none	
C1-170	EI, SRC, TCLP	economic impact to cities with closed military bases. No C and D landfills	City of Seaside, CA	none	
C1-171	EI, SRC, TCLP	request clarification of the types of wastes and consideration of expanding the coverage of C and D waste	The Painting and Decorating Contractors of America	none	

C1-172	EI, SRC, TSCA, RCRA	effect on the reuse/salvage industry	Institute of Scrap Recycling Industries, Inc.	none	
C1-173	EI	effect on the reuse/salvage industry	Global Waste Recycling Inc.	none	
C1-174	EI, SRC, GW Monitoring, IMP, TSCA, RCRA, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	NorCal Waste Systems, INC.	yes	pH values from 52 landfills ranged from 6.2 - 9. Background Concentrations of Pb were less than 0.1mg/L. In a separate study of 30 LFs pH ranged from 5.9 - 8.4 with a mean of 7.0. Pb concentrations range from 0.002 - 1.5 mg/L
C1-175	copy of C174	copy of C1-174	NorCal Waste Systems, INC.	yes	copy of C1-174
C1-176	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	Environmental Resource Return Corp.	none	
C1-177	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Questions the validity of the leachability of Pb in MSW landfill	Delaware Solid Waste Authority	yes	pH values of 6.0 to 7.5
C1-178	EI, GW Monitoring, SRC	copy of C1-114	Kern County Waste Management Dep, CA	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-179	EI, SRC	effect on the reuse/salvage industry	RE Store	none	
C1-180	EI, SRC, GW Monitoring, TCLP	copy of C1-153	Pima-Maricopa Indian Community, Salt River AZ	yes	copy of C1-153
C1-181	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt	Duke Power Company	none	
C1-182	copy of C153, C180	copy of C1-153, C1-180	Pima-Maricopa Indian Community, Salt River AZ	yes	copy of C1-153
C1-183	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Parish of Jefferson, Louisiana	yes	Samples collected quarterly since 1996. 9 of 12 samples ND (<0.003mg/L). Highest Pb of 0.014 mg/L. Lowest pH = 6.9, usually 7.5 - 8.5
C1-184	IMP, SRC, TCLP	argument for the use of liners and control mechanism and source leachability	N. Marker, Solid and Hazardous Waste Management Branch	yes	"A rather large database, including 100s of leachate samples…" pH range from 6 - 7.5
C1-185	GW Monitoring, GW Modeling, TSCA	question the validity of science used to make regulation	Metro Waste Authority, Iowa, Des Moines	none	
C1-186	EI, IMP	copy of c1-091	NJ DEP	yes	copy of c1-091

C1-187	EI, GW modeling	effect on the reuse/salvage industry. Suggest that the EPA look further into recovery options and er-examine the effects of the proposed rule on potential recovery	NC Div of Pollution Prevention and Env. Assistance	none	
C1-188	IMP, EI, SRC	Copy of C1-092	Solid Waste Association of North America	yes	Copy of C1-092
C1-189	EI, SRC	copy of C1-148	Washington State Recycling Association	none	
C1-190	EI, SRC	effect on the reuse/salvage industry	Bureau of Sanitation of the City of Los Angeles	none	
C1-191	EI, SRC, PROC	effect on the reuse/salvage industry	smillian	none	
C1-192	EI, SRC	effect on the reuse/salvage industry, Consumer information and Labeling	Second Use Building Materials	none	
C1-193	missing				
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-194	EI, IMP, GW modeling, RCRA, TSCA, TCLP, SRC	discussion of exceptions to implementation, future analysis required	Dep of Health, OSW	none	
C1-195	EI, IMP	effect on the reuse/salvage industry	J. Sununu, House of Representatives, 1st District NH	none	
C1-196	EI, IMP	effect on the reuse/salvage industry. Disposal of LBP debris as Household waste, recycling of LBP debris	CA Integrated Waste Management Board	none	
C1-197	SUP	support, address definition of composite lined Vs unlined	DOH Childhood Lead Poisoning Prevention Branch	none	
C1-198	IMP	argument for the use of liners and control mechanisms. Don't exclude LBP from MSW	Solid Waste District of Defiance, Fulton, Paulding, and Williams	yes	leachate characteristics test results from Defiance County LF. Tabulated data for Pb and pH
C1-199	IMP, RCRA, TSCA, TCLP, SRC	electric utilities should be exempt	Centeral And South West Services	none	
C1-200	EI, IMP, SRC	effect on the reuse/salvage industry. discussion of validity of requirement examine the total impact on both human health and the environment	Used Building Materials Association	none	

C1-201	EI, TCLP, SRC, GW modeling, GW monitoring	effect on the reuse/salvage industry, Invalid standard for source, reference to HWIR Proceedings, DAF may be as high as 5000 not 100 as used. Should incorporate Pb bearing soils	Lead Industries Association, Inc.	none	
C1-202	EI	effect on the reuse/salvage industry	Construction Materials Recycling Association	none	
C1-203	EI	effect on the reuse/salvage industry	New England Ecological Development	none	
C1-204	EI, TCLP	effect on the reuse/salvage industry	City of Little Rock AR, Dep of Public Works	none	
C1-205	EI, IMP	argument for the use of liners and control mechanism. questions implementation and procedure	Mississippi Dep of Env. Quality	none	
C1-206	EI, IMP	effect on the reuse/salvage industry	Central Construction and Demolition Recycling, INC.	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-207	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Anne Arundel County, MD	yes	Leachate from one LF "... pH generally ranges from 6.5 - 7"
C1-208	EI, IMP	effect on the reuse/salvage industry	U.S. Recycling and Wrecking, inc.	none	
C1-209	EI, IMP	effect on the reuse/salvage industry	G.L. Williams and Son Trucking, Inc.	none	
C1-210	EI, IMP	argument for the use of liners and control mechanism. questions implementation and procedure	Scott Area Solid Waste Management Commission, Iowa	yes	"We have found our pH levels to be approximately neutral"
C1-211	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	ICONCO	none	
C1-212	SRC, TCLP, GW Modeling, GW analysis	validity of testing procedure, Shortage of C and D LFs will cause a hardship	Solid Waste Association of North America	yes	sites the Summary for Data on Municipal Solid Waste Landfill Leachate Characteristics, USEPA July 1988
C1-213	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.
C1-214	EI, IMP, SRC, GW Monitoring	argument for the use of liners and control mechanism. questions implementation and procedure	Northeast Maryland Waste Disposal Authority	yes	Average pH ranged form 6.70 to 8.75. Tabulated pH results from four years for two LFs

APPENDIX B. All RCRA Comments

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris, RCRA

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
lpdp 1	SUP	thank you support	J. Moore	none	
lpdp 2	PROC	request for more time to comment	Alliance for Safe and Responsible Lead Abatement	none	
lpdp 3	PROC	request for more time to comment	Battery Council International	none	
lpdp 4	PROC, TCLP, RCRA	request for more time to comment	ASTSWMO Solid Waste Subcommittee	none	
lpdp 5	PROC	request for more time to comment	Assistant Deputy Under Secretary of Defense, Environmental Quality	none	
lpdp 6	SUP, IMP	concur with agency position that TC rule should be suspended	Waco Inc.	yes	"We have DOCUMENTATION that this type of debris does not normally test hazardous ..."
lpdp 7	SUP, IMP, TSCA, RCRA	support TC suspension, questions of implementation	Alliance to End Childhood Lead Poisoning	none	
lpdp 8	PROC	request for more time to comment	BFI	none	
lpdp 9	IMP, SRC, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure	RI Department of Environmental Management	none	

lpdp 10	IMP, SRC, GW monitoring, GW modeling, SPLP, TSCA	support TC suspension, questions of implementation, questions assumptions of the source model and the effects on fate and transport	MA Bureau of Waste Prevention, Business Compliance Division	yes	Tabulated results of Pb concentrations from several monitoring wells from several LFs
lpdp 11	IMP, SRC, TCLP, TSCA, RCRA	arguments about the burdensome nature of regulation. It will discourgae recycling	Ford	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 12	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	MI Dep. Of Environmental Quality	yes	mean pH value for 49 LF cells was 7.02 with a low of 5.8, Tabulated pH values
lpdp 13	IMP, SRC, TCLP, TSCA, RCRA	questions of applicability to radioactive metal with LBP	DOE	none	
lpdp 14	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt	Utility Solid Waste Activities Group	none	
lpdp 15	EI, SRC, IMP, TCLP, TSCA, RCRA	effect on the reuse/salvage industry, question sof storage, potential confusion in implementation, failure to study the proctice of recycling of concrete	GE	none	
lpdp 16	IMP, SRC, TCLP, SPLP, TSCA, GW modeling	effects of lead contaminated soil. EPA has developed a constituent-specific Dilution Attenuation Factor of 5000 for lead which differs from the DAF of 100 used in the TC Rule	Battery Council International	none	
lpdp 17	EI	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	Allegany County Dep. Of Public Works	none	
lpdp 18	EI, IMP, SRC, GW modeling, TCLP, RCRA, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure. "… Proposial is based on faulty technical assumptions regarding landfill leachate…"	Waste Management	yes	Tabulated results of Pb concentrations from several monitoring wells from several LFs

lpdp 20	SRC	argument for the use of liners and control mechanism.	Solid Waste Association of North America, Florida Sunshine Chapter	yes	Anecdotal: "Empirical data showing that lead concentrations in leachate from … is not of the magnitude to cause concern."
lpdp 19	SUP, SRC, GW modeling	support TC suspension. Encouraged that the US EPA plans to re-evaluate the issue of lead groundwater mobility.	Reliant Energy	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 21	EI, IMP, SRC, GW monitoring, RCRA, TCLP, SPLP	argument for the use of liners and control mechanism. questions implementation and procedure. Issues of catastrophic events and the lack of design criteria for C and D LFs	ASTSWMO	yes	pH ranges form 6-7 not 5 as assumed by the tests
lpdp 22	IMP, SRC	implementation and exceptions for small quantity generators	Ohio EPA	none	
lpdp 23	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt. Clarification and amendments to the rule	Pacific Gas and Electric	none	
lpdp 24	IMP, RCRA, TSCA	electric utilities should be exempt	Texas Utilities Services	none	
lpdp 25	IMP, SRC, IMP, GW monitoring, TSCA, TCLP, RCRA	arguments of scope, implementation, and exclusion of LBPD from MSW landfills	NY Dep. Of Environmental Conservation	yes	Tabulated results of Pb concentrations from several locations
lpdp 26	IMP, RCRA, TSCA	statement of implementation, prefers to manage wastes as RCRA hazardous wastes	PSE&G	none	
lpdp 27	IMP, SRC, GW monitoring, TCLP, RCRA, TSCA	support TC suspension, questions of implementation. Does not want LBPD excluded from MSWLFs	Painting and Decorating Contractors of America	none	

lpdp 28	EI, TCLP, SRC, GW modeling, GW monitoring	effect on the reuse/salvage industry, Invalid standard for source, reference to HWIR Proceedings, DAF may be as high as 5000 not 100 as used. Should incorporate Pb bearing soils	Lead Industries Association, Inc.	none	
lpdp 29	duplicate of lpdp 23	electric utilities should be exempt. Clarification and amendments to the rule	Pacific Gas and Electric	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 30	IMP, SRC, GW monitoring, GW modeling, RCRA, TCLP, TSCA	comments of implementation, storage, radioactive waste, exclusion of LBPD from MSWLFs. GW risk analysis results for MSWSFs are quite similar to those of C and D LFs	DOD	none	
lpdp 31	IMP, SRC, TCLP	argument for the use of liners and control mechanism. questions implementation and procedure	American Forest and Paper Asspcoatopm	none	
lpdp 32	IMP, SRC, GW modeling, GW monitoring	opposed to adoption of rule, arguments of implementation	FAA	none	
lpdp 33	IMP, SRC, TCLP	electric utility seeking exemption	South Carolina Electric And Gas Company	none	
lpdp 34	EI, IMP, SRC, GW monitoring	argument for the use of liners and control mechanism.	New Hanover County Dep. Of Enviro. Management	yes	four sampeling events of Pb concentration and pH valuses. All Pb < 0.003, High pH = 8.03, low = 7.51
lpdp 35	GW Monitoring, GW Modeling, TSCA	question the validity of science used to make regulation	Metro Waste Authority, Des Moines, Iowa	none	
lpdp 36	EI, GW Monitoring, SRC, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills	General Motors	none	

lpdp 37	EI, IMP, SRC	effect on the reuse/salvage industry. discussion of validity of requirement examine the total impact on both human health and the environment	Used Building Materials Association	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 38	GW Modeling, SRC, IMP, RCRA, TCLP	arguments against enactment, Conflicts with RCRA,	Alliance for Safe and Responsible Lead Abatement	yes	Bar plot of Leachable Pb vs pH. TCLP results of Pb = 54.26(units?), 22.0 ppm, 130 ppm
lpdp 39	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	
lpdp 40	EI, SRC	economic impact of implementation	County of Fresno	none	
lpdp L1	IMP, RCRA, TSCA, TCLP, SRC	electric utilities should be exempt	Centeral And South West Services	none	
lpdp L2	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.

APPENDIX C. TSCA/RCRA Source Comments

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. TSCA Source Comments

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-001	SRC, IMP, RCRA	dispute effect of LBPCD in MSW. impact on rural communities not considered. impact of procedure oppressive.	Kansas Dep of Health and Env	none	
C1-019	IMP, SRC, SPLP, GW Modeling, RCRA, TCLP	shortage of C and D landfills, implementation	State of Illinois	none	
C1-028	SRC	Acidic nature of leachate could not be used as justification for not allowing LBP in MSWLF as the organic nature of C and D will contribute to the acidic content of the LF	Oklahoma DEQ	none	
C1-035	SRC, TSCA, RCRA	Geographic factors should be considered in the regulatory process. The arid regions produce less organic leachate. The implementation under TSCA affects RCRA facilities thus fragmenting existing programs.	Wyoming DEQ	none	
C1-043	IMP, SRC	opposed to the regulation. Comments on sources of LPB in Poisoning of children	Washington Poison Center	none	
C1-052	SRC	several arguments why LBPD should be accepted in MSWLFs	Monterey Regional Waste Management District	yes	pH = 6.1 to 6.8 from 35 samples over a 3 year period
C1-054	SRC	source conditions observed are not "highly" acidic	Michigan DEQ	yes	49 of 52 mean pH of 7.02, low of 5.8, high of 7.4
C1-057	SRC,	argument for the use of liners and control mechanism. questions implementation and procedure	Frederick MD DPW	yes	Leachate lab test results of ND , 0.0015 mg/L with a pH of 6.32
C1-062	EI, SRC	economic impact of implementation. Conditions in MSWLF are not "highly" acidic	Randazzo Ent. Inc	yes	pH from lined landfills is 6.1 to 6.8
C1-069	EI, SRC	opposed to the regulation. Arguments for allowing LBP in MSWLF.	Harrison County Solid Waste Authority WV	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-073	EI, SRC, SPLP, TCLP	effect on the private MSW industry. Erroneous assumption of acidic leachate and TCLP	National Solid Wastes Management Association	yes	pH = 6.94 from 13 MSWLF and 138 samples. pH of 7 from C and D LFs. Correlation plots of pH and Pb, pH and LF type
C1-074	EI, SRC, RCRA, TSCA, TCLP	effect on the MSW operation. Erroneous assumption of acidic leachate and TCLP	County of San Jouquin	yes	pH = 6.4 from 25 samples over four years with a low of 6.0 and a high of 7.3
C1-076	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	
C1-079	SRC, IMP, SPLP, TCLP	dispute effect of LBPCD in MSW.	Superior Services	yes	several pH and Pb test results from 1994 to 1998
C1-081	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Maryland's Solid Waste Program	none	
C1-085	EI, GW Monitoring, SRC, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills	General Motors	none	
C1-087	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	UT Davis County Solid Waste Management	none	
C1-088	IMP, SRC, TCLP	argument for the use of liners and control mechanism. questions implementation and procedure	American Forest and Paper Association	none	
C1-092	IMP, EI, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Solid Waste Association of North America	yes	pH = 6.1 to 6.8 from 35 samples over a 3 year period
C1-093	GW Modeling, SRC, IMP, RCRA, TCLP	arguments against enactment, Conflicts with RCRA,	Alliance for Safe and Responsible Lead Abatement	yes	Bar plot of Reachable Pb vs pH. TCLP results of Pb = 54.26(units?), 22.0 ppm, 130 ppm
C1-094	IMP, SRC, TCLP	electric utility seeking exemption	South Carolina Electric And Gas Company	none	
C1-096	IMP, SRC, GW Modeling, GW analysis	review of regulation	US Dep. Of Housing and Urban Development	none	
C1-097	EI, SRC	effect on the reuse/salvage industry. Concrete crushing and recycling for use in road beds	anonymous	none	

C1-098	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure. Liming technique used in daily cover to buffer pH	NJ Middlesex County Utilities Authority	none	
C1-099	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	TN Dep of Env. And Conservation	none	
C1-102	IMP, SRC, EI, TSCA, RCRA	comments and clarification of the provisions. Arguments for the effectiveness of liners and leachate recovery systems	CT DEP	none	
C1-103	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills, pH conditions inside the LF	Development Authority of the North Country, Rodman NY	yes	pH = 6.73 current average for all facilities
C1-105	IMP, SRC, EI, TSCA	comments and clarification of the provisions. The fate of demolition of buildings with LBP	G.E.	none	
C1-107	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	CH2MHILL / SWANA	none	
C1-108	EI, SRC	municipality seeking exemption. Arid conditions affect the source	City of Bolder NV	none	
C1-109	EI, GW Analysis, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	NV Division of Environmental Protection	none	
C1-111	EI, IMP, SRC, TCLP, RCRA	argument for the use of liners and control mechanism. questions implementation and procedure. Impact on recycling	Kings County WA	none	
C1-113	EI, GW Monitoring, SRC, RCRA, TCLP	economic impact of implementation. shortage of C and D landfills	Municipality of Anchorage Solid Waste Services	yes	Lead leachate has been: ND 27.4%, exceeded EPA standards 8.3% in the past 11 years. Max Pb 0.1090mg/L
C1-114	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills argument for the use of liners and control mechanism.	Kern County Waste Management Dep, CA	none	
C1-115	EI, IMP, SRC, GW Modeling, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	State of Vermont	yes	data from 1992 to 1999. 74% (63) of samples were ND, 11% (9) were above DL but below MCL, 15% (13) were above MCL. pH generally between 6 - 7
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

C1-116	EI, IMP, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	US EPA Region 1	none	
C1-117	EI, SRC, RCRA	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	Nebraska DEQ	none	
C1-118	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills	Solid Waste Association of North America, Nebraska	yes	Plot of pH, Pb concentration vs time for a 750 TPD MSWLF operating since 1989
C1-119	EI, SRC, TCLP, SPLP	economic impact of implementation. shortage of C and D landfills	City of York, Nebraska	none	
C1-121	missing pages, SRC, TSCA, RCRA, TCLP	missing pages	Battery Council International	yes	results from TCLP of 26 and 20 (units?) and from the same samples using SPLP of 0.11 and 0.14(units?)
C1-122	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation	WasteManagement	yes	missing leachate report
C1-123	EI, GW Monitoring, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, source conditions don't support TCLP assumptions	NH DES	yes	pH in the range of 6-7, tabular form of pH and Pb concentrations for four MSWLFs
C1-124	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation, LBP in MSWLFs does not constitute an exposure pathway for children	Association of State and Territorial Solid Waste Management Officials	yes	pH in the range of 6-7
C1-125	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Association of State and Territorial Solid Waste Management Officials	none	
C1-126	EI, IMP, SRC, RCRA	US Post Office seeking exemption to regulations	US Post Office	none	
C1-128	IMP, SRC, EI, TSCA, RCRA, TCLP	electric utilities should be exempt,arguments of validity of TCLP and source assumptions	Pacific Gas and Electric	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

C1-129	SRC, GW Monitoring, GW Modeling	opposed to the exclusion of C and D waste in MSW	Ohio EPA	yes	pH = 6.11 to 8.15, Pb = 3ug/L to 181 ug/L, Tabulated results.
C1-131	EI, SRC, GW Monitoring, IMP	arguments against enactment, question the adequacy of EPA studies	OR DHR	none	
C1-132	IMP, SRC, EI, TSCA, TCLP	electric utilities should be exempt	Public Service Electric and Gas Company	none	
C1-133	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Solid Waste Association of North America, Alaska	yes	Citing from EPA Factbook as to the total amount of Pb in MSW
C1-134	EI, SRC	economic impact of implementation	County of Fresno	none	
C1-135	SRC, IMP, DTSC	arguments of source definitions, LBP structures are not considered hazardous waste as per DTSC	NorCal Waste Systems, INC.	none	
C1-136	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry. General attack on the science	Rodchester Environmental Park	none	
C1-137	EI, GW Monitoring, SRC	economic impact of implementation. Questions the science of regulation	Snohomish County, WA	yes	pH of 6.6 in leachate
C1-142	EI, SRC, RCRA, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, natural alkalinity of soil	Clark County, NV	none	
C1-143	EI, SRC	Economic impact due to lack of C and D landfills, impact on the reuse/recycling community	L. R. Higgins, Inc	none	
C1-144	EI, SRC, GW Monitoring, IMP, TCLP	arguments for changes to the implementation, more state control, analysis ignored the function of liners	Florida Dep of Env. Protection	yes	pH typically 4.7 to 7.7. Methane producing phase produces pH of 6.3 to 8.8. HELP model results and lab results in a table format
C1-145	EI, SRC, GW Monitoring, GW Modeling, IMP, TSCA, TCLP	DOE seeking to address low level radio active LBP wastes, compliance and implementation comments	DoE	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

C1-146	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills	County of Santa Barbara, Public Works	yes	Pb in monitoring wells closest to LF 12 ppb
C1-147	SRC, GW Monitoring, TCLP, SPLP	arguments against the implementation because of questions of the source conditions	Des Moines County Regional Solid Waste Commission	yes	pH usually 7.5 to 8.7, lowest 7.0, highest 8.8
C1-148	EI, SRC	effect on the reuse/salvage industry	Washington State Recycling Association	none	
C1-149	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Environmental Services Joint Powers Authority	none	
C1-150	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	County Sanitation Districts of Los Angles County	yes	Pb = 0.06, 0.03, 0.05 mg/L, pH 6.31 - 8.39 median 7.49. Monthly pH and Pb results from 1990 thou 1996 for two LFs
C1-151	EI, SRC, GW Monitoring, RCRA, TSCA	clarification of technical issues. Exclusion of C and D waste from MSW landfills	NY Dep of Env Conservation	yes	Leachate quality data from several MSW and C and D LFs in table form
C1-152	EI, SRC	effect on the reuse/salvage industry	Wood Recycling, Inc.	yes	Pb content of hydromulch (recycled wood product) 0.306 mg/L
C1-153	EI, SRC, GW Monitoring, TCLP	argument for the use of liners and control mechanism	Pima-Maricopa Indian Community, Salt River AZ	yes	1 out of 14 samples tested for Pb at 0.052 mg/L
C1-155	EI, SRC, TCLP	effect on the reuse/salvage industry	Western Recycling, Inc.	none	
C1-156	EI, SRC	effect on the reuse/salvage industry	Specialty Crushing, Inc.	none	
C1-157	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt, arguments of validity of TCLP and source assumptions, impact of catastrophic events	Pacific Gas and Electric	none	
C1-158	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	University of CA Santa Cruz	none	
C1-159	EI, SRC	effect on the reuse/salvage industry	Eagle Crusher Company of Galion	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-160	EI, SRC	effect on the reuse/salvage industry	American Waste Industries	none	

C1-162	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, soil conditions in arid regions	City of San Diego, Env Services Dep	yes	pH ranged from 6.5 to 7.6, Pb of 0.14
C1-163	EI, SRC	effect on the reuse/salvage industry	Reuse Development Organization, NY Office of Recycling Market Development	none	
C1-165	EI, SRC, GW Monitoring	copy of C1-150	County Sanitation Districts of Los Angles County	yes	copy of C1-150
C1-167	EI, SRC, GW Monitoring, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, question the validity of assumptions in TCLP	City of Tucson Solid Waste Management Dep	yes	Sampling of leachate typically shows pH of 6.8 with a low of 6.54, Pb = 0.016 mg/L
C1-169	EI, IMP, SRC, RCRA	Copy of C1-126	US Post Office	none	
C1-170	EI, SRC, TCLP	economic impact to cities with closed military bases. No C and D landfills	City of Seaside, CA	none	
C1-171	EI, SRC, TCLP	request clarification of the types of wastes and consideration of expanding the coverage of C and D waste	The Painting and Decorating Contractors of America	none	
C1-172	EI, SRC, TSCA, RCRA	effect on the reuse/salvage industry	Institute of Scrap Recycling Industries, Inc.	none	
C1-174	EI, SRC, GW Monitoring, IMP, TSCA, RCRA, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	NorCal Waste Systems, INC.	yes	pH values from 52 landfills fringed from 6.2 - 9. Background Concentrations of Pb were less than 0.1mg/L. In a separate study of 30 LFs pH ranged from 5.9 - 8.4 with a mean of 7.0. Pb concentrations range from 0.002 - 1.5 mg/L
C1-176	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	Environmental Resource Return Corp.	none	
C1-177	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Questions the validity of the leachability of Pb in MSW landfill	Delaware Solid Waste Authority	yes	pH values of 6.0 to 7.5
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-179	EI, SRC	effect on the reuse/salvage industry	RE Store	none	

C1-180	EI, SRC, GW Monitoring, TCLP	copy of C1-153	Pima-Maricopa Indian Community, Salt River AZ	yes	copy of C1-153
C1-181	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt	Duke Power Company	none	
C1-183	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Parish of Jefferson, Louisiana	yes	Samples collected quarterly since 1996. 9 of 12 samples ND (<0.003mg/L). Highest Pb of 0.014 mg/L. Lowest pH = 6.9, usually 7.5 - 8.5
C1-184	IMP, SRC, TCLP	argument for the use of liners and control mechanism and source leachability	N. Marker, Solid and Hazardous Waste Management Branch	yes	"A rather large database, including 100s of leachate samples…" pH range from 6 - 7.5
C1-188	IMP, EI, SRC	Copy of C1-092	Solid Waste Association of North America	yes	Copy of C1-092
C1-189	EI, SRC	copy of C1-148	Washington State Recycling Association	none	
C1-190	EI, SRC	effect on the reuse/salvage industry	Bureau of Sanitation of the City of Los Angeles	none	
C1-191	EI, SRC, PROC	effect on the reuse/salvage industry	smillian	none	
C1-192	EI, SRC	effect on the reuse/salvage industry, Consumer information and Labeling	Second Use Building Materials	none	
C1-194	EI, IMP, GW modeling, RCRA, TSCA, TCLP, SRC	discussion of exceptions to implementation, future analysis required	Dep of Health, OSW	none	
C1-199	IMP, RCRA, TSCA, TCLP, SRC	electric utilities should be exempt	Central And South West Services	none	
C1-200	EI, IMP, SRC	effect on the reuse/salvage industry. discussion of validity of requirement examine the total impact on both human health and the environment	Used Building Materials Association	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
C1-207	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Anne Arundel County, MD	yes	Leachate from one LF "... pH generally ranges from 6.5 - 7"

C1-211	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	ICONCO	none	
C1-212	SRC, TCLP, GW Modeling, GW analysis	validity of testing procedure, Shortage of C and D LFs will cause a hardship	Solid Waste Association of North America	yes	sites the Summary fo Data on Municipal Solid Waste Landfill Leachate Characteristics, USEPA July 1988
C1-213	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.
C1-214	EI, IMP, SRC, GW Monitoring	argument for the use of liners and control mechanism. questions implementation and procedure	Northeast Maryland Waste Disposal Authority	yes	Average pH ranged form 6.70 to 8.75. Tabulated pH results from four years fortwo LFs

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. RCRA Comments With Source Impacts.

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
lpdp 9	IMP, SRC, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure	RI Department of Environmental Management	none	
lpdp 10	IMP, SRC, GW monitoring, GW modeling, SPLP, TSCA	support TC suspension, questions of implementation, questions assumptions of the source model and the effects on fate and transport	MA Bureau of Waste Prevention, Business Compliance Division	yes	Tabulated results of Pb concentrations from several monitoring wells from several LFs
lpdp 11	IMP, SRC, TCLP, TSCA, RCRA	arguments about the burdensome nature of regulation. It will discourage recycling	Ford	none	
lpdp 12	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	MI Dep. Of Environmental Quality	yes	mean pH value for 49 LF cells was 7.02 with a low of 5.8, Tabulated pH values
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 14	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt	Utility Solid Waste Activities Group	none	
lpdp 15	EI, SRC, IMP, TCLP, TSCA, RCRA	effect on the reuse/salvage industry, question of storage, potential confusion in implementation, failure to study the practice of recycling of concrete	GE	none	

lpdp 16	IMP, SRC, TCLP, SPLP, TSCA, GW modeling	effects of lead contaminated soil. EPA has developed a constituent-specific Dilution Attenuation Factor of 5000 for lead which differs from the DAF of 100 used in the TC Rule	Battery Council International	none	
lpdp 18	EI, IMP, SRC, GW modeling, TCLP, RCRA, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure. "… Proposal is based on faulty technical assumptions regarding landfill leachate…"	Waste Management	yes	Tabulated results of Pb concentrations from several monitoring wells from several LFs
lpdp 19	SUP, SRC, GW modeling	support TC suspension. Encouraged that the US EPA plans to re-evaluate the issue of lead groundwater mobility.	Reliant Energy	none	
lpdp 20	SRC	argument for the use of liners and control mechanism.	Solid Waste Association of North America, Florida Sunshine Chapter	yes	Anecdotal: "Empirical data showing that lead concentrations in leachate from … is not of the magnitude to cause concern."
lpdp 21	EI, IMP, SRC, GW monitoring, RCRA, TCLP, SPLP	argument for the use of liners and control mechanism. questions implementation and procedure. Issues of catastrophic events and the lack of design criteria for C and D LFs	ASTSWMO	yes	pH ranges form 6-7 not 5 as assumed by the tests
lpdp 22	IMP, SRC	implementation and exceptions for small quantity generators	Ohio EPA	none	
lpdp 23	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt. Clarification and amendments to the rule	Pacific Gas and Electric	none	
lpdp 25	IMP, SRC, IMP, GW monitoring, TSCA, TCLP, RCRA	arguments of scope, implementation, and exclusion of LBPD from MSW landfills	NY Dep. Of Environmental Conservation	yes	Tabulated results of Pb concentrations from several locations
lpdp 27	IMP, SRC, GW monitoring, TCLP, RCRA, TSCA	support TC suspension, questions of implementation. Does not want LBPD excluded from MSWLFs	Painting and Decorating Contractors of America	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 30	IMP, SRC, GW monitoring, GW modeling, RCRA, TCLP, TSCA	comments of implementation, storage, radioactive waste, exclusion of LBPD from MSWLFs. GW risk analysis results for MSWSFs are quite similar to those of C and D LFs	DOD	none	

lpdp 31	IMP, SRC, TCLP	argument for the use of liners and control mechanism. questions implementation and procedure	American Forest and Paper Association	none	
lpdp 32	IMP, SRC, GW modeling, GW monitoring	opposed to adoption of rule, arguments of implementation	FAA	none	
lpdp 33	IMP, SRC, TCLP	electric utility seeking exemption	South Carolina Electric And Gas Company	none	
lpdp 34	EI, IMP, SRC, GW monitoring	argument for the use of liners and control mechanism.	New Hanover County Dep. Of Enviro. Management	yes	four sampling events of Pb concentration and pH values. All Pb < 0.003, High pH = 8.03, low = 7.51
lpdp 36	EI, GW Monitoring, SRC, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills	General Motors	none	
lpdp 37	EI, IMP, SRC	effect on the reuse/salvage industry. discussion of validity of requirement examine the total impact on both human health and the environment	Used Building Materials Association	none	
lpdp 38	GW Modeling, SRC, IMP, RCRA, TCLP	arguments against enactment, Conflicts with RCRA,	Alliance for Safe and Responsible Lead Abatement	yes	Bar plot of Leachable Pb vs pH. TCLP results of Pb = 54.26(units?), 22.0 ppm, 130 ppm
lpdp 39	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
lpdp 40	EI, SRC	economic impact of implementation	County of Fresno	none	
lpdp L1	IMP, RCRA, TSCA, TCLP, SRC	electric utilities should be exempt	Central And South West Services	none	

lpdp L2	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.

APPENDIX D. TSCA/RCRA GW Monitoring and Modeling Comments

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. TSCA GW Monitoring and Modeling Comments

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-019	IMP, SRC, SPLP, GW Modeling, RCRA, TCLP	shortage of C and D landfills, implementation	State of Illinois	none	
C1-025	GW, TCLP, SPLP	Insufficient GW research/modeling/analysis, TCLP and SPLP based on assumptions that are unsupported in actual landfill conditions	City of Grand Island Nebraska	none	
C1-027	GWM,	MSWLF and C and D LF are built an d operated in accordance with the same regulations, therefore LBPD should not be excluded from MSWLFs.	Massachusetts Dep. Of Env. Pro.	yes	Pb levels from multiple well locations at multiple sites (up gradient and down gradient) spanning several years
C1-031	GW Modeling,	the modeling analysis conducted for C and D LF have many uncertainties, therefore, there should be some minimum engineering criteria for C and D LFs	National Lead Assessment and Abatement Council	none	
C1-036	GW Modeling, RCRA, TSCA	support of regulation and EPA GW modeling	NY DOH	none	
C1-041	TSCA, RCRA, GW modeling	support of regulation	New York Dep of Health	none	
C1-036	TSCA, RCRA, GW modeling	GW modeling indicates that leachate concentrations should be very low. Support of regulation	New York Dep of Health	none	
C1-061	EI, TCLP, GW Modeling	economic impact of implementation . Suggest that GW modeling supports the possibility of contamination of down-gradient drinking wells is remote	MidAmerician Energy	none	
C1-067	EI, GW Modeling	oppose the exclusion of LPBCD in MSW	State of Colorado HM/WM	none	
C1-070	IMP, TCLP, GW Monitoring	economic impact of implementation and exclusion of LBP in MSWLF. shortage of C and D landfills	State of Nebraska	yes	pH of leachate in the range of 6-7 from MSWLF owner/Operators
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

C1-085	EI, GW Monitoring, SRC, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills	General Motors	none	
C1-090	IMP, TSCA, GW analysis	implementation of procedure	Rouse Company	none	
C1-093	GW Modeling, SRC, IMP, RCRA, TCLP	arguments against enactment, Conflicts with RCRA,	Alliance for Safe and Responsible Lead Abatement	yes	Bar plot of Reachable Pb vs pH. TCLP results of Pb = 54.26(units?), 22.0 ppm, 130 ppm
C1-096	IMP, SRC, GW Modeling, GW analysis	review of regulation	US Dep. Of Housing and Urban Development	none	
C1-103	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills, pH conditions inside the LF	Development Authority of the North Country, Rodman NY	yes	pH = 6.73 current average for all facilities
C1-106	GW Modeling, IMP	comments on modeling uncertainties	NJ Dep of Community Affairs	none	
C1-109	EI, GW Analysis, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	NV Division of Environmental Protection	none	
C1-113	EI, GW Monitoring, SRC, RCRA, TCLP	economic impact of implementation. shortage of C and D landfills	Municipality of Anchorage Solid Waste Services	yes	Lead leachate has been: ND 27.4%, exceeded EPA standards 8.3% in the past 11 years. Max Pb 0.1090mg/L
C1-114	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills argument for the use of liners and control mechanism.	Kern County Waste Management Dep, CA	none	
C1-115	EI, IMP, SRC, GW Modeling, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	State of Vermont	yes	data from 1992 to 1999. 74% (63) of samples were ND, 11% (9) were above DL but below MCL, 15% (13) were above MCL. pH generally between 6 - 7
C1-118	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills	Solid Waste Association of North America, Nebraska	yes	Plot of pH, Pb concentration vs time for a 750 TPD MSWLF operating since 1989
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

C1-122	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation	WasteManagement	yes	missing leachate report
C1-123	EI, GW Monitoring, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, source conditions don't support TCLP assumptions	NH DES	yes	pH in the range of 6-7, tabular form of pH and Pb concentrations for four MSWLFs
C1-124	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation, LBP in MSWLFs does not constitute an exposure pathway for children	Association of State and Territorial Solid Waste Management Officials	yes	pH in the range of 6-7
C1-125	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Association of State and Territorial Solid Waste Management Officials	none	
C1-129	SRC, GW Monitoring, GW Modeling	opposed to the exclusion of C and D waste in MSW	Ohio EPA	yes	pH = 6.11 to 8.15, Pb = 3ug/L to 181 ug/L, Tabulated results.
C1-131	EI, SRC, GW Monitoring, IMP	arguments against enactment, question the adequacy of EPA studies	OR DHR	none	
C1-133	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Solid Waste Association of North America, Alaska	yes	Citing from EPA Factbook as to the total amount of Pb in MSW
C1-136	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry. General attack on the science	Rodchester Environmental Park	none	
C1-137	EI, GW Monitoring, SRC	economic impact of implementation. Questions the science of regulation	Snohomish County, WA	yes	pH of 6.6 in leachate
C1-140	GW Monitoring	opposed to the exclusion of C and D waste in MSW	The Prince George's County , Dep of Env. Rec	yes	Pb from 0.015 to 0.053 ppm, pH 6.5 - 7
C1-141	EI, GW Monitoring	economic impact of implementation. shortage of C and D landfills	County of Sonoma	yes	"Testing results of our leachate indicate that the pH is neutral ……"
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

C1-144	EI, SRC, GW Monitoring, IMP, TCLP	arguments for changes to the implementation, more state control, analysis ignored the function of liners	Florida Dep of Env. Protection	yes	pH typically 4.7 to 7.7. Methane producing phase produces pH of 6.3 to 8.8. HELP model results and lab results in a table format
C1-145	EI, SRC, GW Monitoring, GW Modeling, IMP, TSCA, TCLP	DOE seeking to address low level radio active LBP wastes, compliance and implementation comments	DoE	none	
C1-146	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills	County of Santa Barbra, Public Works	yes	Pb in monitoring wells closest to LF 12 ppb
C1-147	SRC, GW Monitoring, TCLP, SPLP	arguments against the implementation because of questions of the source conditions	Des Moines County Regional Solid Waste Commission	yes	pH usually 7.5 to 8.7, lowest 7.0, highest 8.8
C1-149	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Environmental Services Joint Powers Authority	none	
C1-150	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	County Sanitation Districts of Los Angles County	yes	Pb = 0.06, 0.03, 0.05 mg/L, pH 6.31 - 8.39 median 7.49. Monthly pH and Pb results from 1990 though 1996 for two LFs
C1-151	EI, SRC, GW Monitoring, RCRA, TSCA	clarification of technical issues. Exclusion of C and D waste from MSW landfills	NY Dep of Env Conservation	yes	Leachate quality data from several MSW and C and D LFs in table form
C1-153	EI, SRC, GW Monitoring, TCLP	argument for the use of liners and control mechanism	Pima-Maricopa Indian Community, Salt River AZ	yes	1 out of 14 samples tested for Pb at 0.052 mg/L
C1-154	EI, GW Monitoring	economic impact of implementation. shortage of C and D landfills	County of Sonoma, Dep of Trans and Public Works	none	
C1-157	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt, arguments of validity of TCLP and source assumptions, impact of catastrophic events	Pacific Gas and Electric	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-158	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	University of CA Santa Cruz	none	
C1-162	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, soil conditions in arid regions	City of San Diego, Env Services Dep	yes	pH ranged from 6.5 to 7.6, Pb of 0.14
C1-165	EI, SRC, GW Monitoring	copy of C1-150	County Sanitation Districts of Los Angles County	yes	copy of C1-150
C1-167	EI, SRC, GW Monitoring, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, question the validity of assumptions in TCLP	City of Tuscon Solid Waste Management Dep	yes	Sampling of leachate typically shows pH of 6.8 with a low of 6.54, Pb = 0.016 mg/L
C1-174	EI, SRC, GW Monitoring, IMP, TSCA, RCRA, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	normal Waste Systems, INC.	yes	pH values from 52 landfills fringed from 6.2 - 9. Background Concentrations of Pb were less than 0.1mg/L. In a separate study of 30 LFs pH ranged from 5.9 - 8.4 with a mean of 7.0. Pb concentrations range from 0.002 - 1.5 mg/L
C1-176	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	Environmental Resource Return Corp.	none	
C1-177	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Questions the validity of the leachability of Pb in MSW landfill	Delaware Solid Waste Authority	yes	pH values of 6.0 to 7.5
C1-178	EI, GW Monitoring, SRC	copy of C1-114	Kern County Waste Management Dep, CA	none	
C1-180	EI, SRC, GW Monitoring, TCLP	copy of C1-153	Pima-Maricopa Indian Community, Salt River AZ	yes	copy of C1-153
C1-181	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt	Duke Power Company	none	

C1-185	GW Monitoring, GW Modeling, TSCA	question the validity of science used to make regulation	Metro Waste Authority, Iowa, Des Moines	none	
C1-187	EI, GW modeling	effect on the reuse/salvage industry. Suggest that the EPA look further into recovery options and er-examine the effects of the proposed rule on potential recovery	NC Div of Pollution Prevention and Env. Assistance	none	
C1-194	EI, IMP, GW modeling, RCRA, TSCA, TCLP, SRC	discussion of exceptions to implementation, future analysis required	Dep of Health, OSW	none	
C1-201	EI, TCLP, SRC, GW modeling, GW monitoring	effect on the reuse/salvage industry, Invalid standard for source, reference to HWIR Proceedings, DAF may be as high as 5000 not 100 as used. Should incorporate Pb bearing soils	Lead Industries Association, Inc.	none	
C1-212	SRC, TCLP, GW Modeling, GW analysis	validity of testing procedure, Shortage of C and D LFs will cause a hardship	Solid Waste Association of North America	yes	sites the Summary of Data on Municipal Solid Waste Landfill Leachate Characteristics, USEPA July 1988
C1-213	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.
C1-214	EI, IMP, SRC, GW Monitoring	argument for the use of liners and control mechanism. questions implementation and procedure	Northeast Maryland Waste Disposal Authority	yes	Average pH ranged form 6.70 to 8.75. Tabulated pH results from four years for two LFs

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. RCRA Groundwater Monitoring and Modeling Comments.

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
lpdp 1	SUP	thank you support	J. Moore	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 2	PROC	request for more time to comment	Alliance for Safe and Responsible Lead Abatement	none	

lpdp 3	PROC	request for more time to comment	Battery Council International	none	
lpdp 4	PROC, TCLP, RCRA	request for more time to comment	ASTSWMO Solid Waste Subcommittee	none	
lpdp 5	PROC	request for more time to comment	Assistant Deputy Under Secretary of Defense, Environmental Quality	none	
lpdp 6	SUP, IMP	concur with agency position that TC rule should be suspended	Waco Inc.	yes	"We have DOCUMENTATION that this type of debris does not normally test hazardous ..."
lpdp 7	SUP, IMP, TSCA, RCRA	support TC suspension, questions of implementation	Alliance to End Childhood Lead Poisoning	none	
lpdp 8	PROC	request for more time to comment	BFI	none	
lpdp 9	IMP, SRC, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure	RI Department of Environmental Management	none	
lpdp 10	IMP, SRC, GW monitoring, GW modeling, SPLP, TSCA	support TC suspension, questions of implementation, questions assumptions of the source model and the effects on fate and transport	MA Bureau of Waste Prevention, Business Compliance Division	yes	Tabulated results of Pb concentrations from several monitoring wells from several LFs
lpdp 11	IMP, SRC, TCLP, TSCA, RCRA	arguments about the burdensome nature of regulation. It will discourage recycling	Ford	none	
lpdp 12	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	MI Dep. Of Environmental Quality	yes	mean pH value for 49 LF cells was 7.02 with a low of 5.8, Tabulated pH values
lpdp 13	IMP, SRC, TCLP, TSCA, RCRA	questions of applicability to radioactive metal with LBP	DOE	none	
lpdp 14	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt	Utility Solid Waste Activities Group	none	
lpdp 15	EI, SRC, IMP, TCLP, TSCA, RCRA	effect on the reuse/salvage industry, question of storage, potential confusion in implementation, failure to study the practice of recycling of concrete	GE	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 16	IMP, SRC, TCLP, SPLP, TSCA, GW modeling	effects of lead contaminated soil. EPA has developed a constituent-specific Dilution Attenuation Factor of 5000 for lead which differs from the DAF of 100 used in the TC Rule	Battery Council International	none	
lpdp 17	EI	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	Allegheny County Dep. Of Public Works	none	

lpdp 18	EI, IMP, SRC, GW modeling, TCLP, RCRA, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure. "… Proposal is based on faulty technical assumptions regarding landfill leachate…"	Waste Management	yes	Tabulated results of Pb concentrations from several monitoring wells from several LFs
lpdp 19	SUP, SRC, GW modeling	support TC suspension. Encouraged that the US EPA plans to re-evaluate the issue of lead groundwater mobility.	Reliant Energy	none	
lpdp 20	SRC	argument for the use of liners and control mechanism.	Solid Waste Association of North America, Florida Sunshine Chapter	yes	Anecdotal: "Empirical data showing that lead concentrations in leachate from … is not of the magnitude to cause concern."
lpdp 21	EI, IMP, SRC, GW monitoring, RCRA, TCLP, SPLP	argument for the use of liners and control mechanism. questions implementation and procedure. Issues of catastrophic events and the lack of design criteria for C and D LFs	ASTSWMO	yes	pH ranges form 6-7 not 5 as assumed by the tests
lpdp 22	IMP, SRC	implementation and exceptions for small quantity generators	Ohio EPA	none	
lpdp 23	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt. Clarification and amendments to the rule	Pacific Gas and Electric	none	
lpdp 24	IMP, RCRA, TSCA	electric utilities should be exempt	Texas Utilities Services	none	
lpdp 25	IMP, SRC, IMP, GW monitoring, TSCA, TCLP, RCRA	arguments of scope, implementation, and exclusion of LBPD from MSW landfills	NY Dep. Of Environmental Conservation	yes	Tabulated results of Pb concentrations from several locations
lpdp 26	IMP, RCRA, TSCA	statement of implementation, prefers to manage wastes as RCRA hazardous wastes	PSE&G	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 27	IMP, SRC, GW monitoring, TCLP, RCRA, TSCA	support TC suspension, questions of implementation. Does not want LBPD excluded from MSWLFs	Painting and Decorating Contractors of America	none	
lpdp 28	EI, TCLP, SRC, GW modeling, GW monitoring	effect on the reuse/salvage industry, Invalid standard for source, reference to HWIR Proceedings, DAF may be as high as 5000 not 100 as used. Should incorporate Pb bearing soils	Lead Industries Association, Inc.	none	

lpdp 29	duplicate of lpdp 23	electric utilities should be exempt. Clarification and amendments to the rule	Pacific Gas and Electric	none	
lpdp 30	IMP, SRC, GW monitoring, GW modeling, RCRA, TCLP, TSCA	comments of implementation, storage, radioactive waste, exclusion of LBPD from MSWLFs. GW risk analysis results for MSWSFs are quite similar to those of C and D LFs	DOD	none	
lpdp 31	IMP, SRC, TCLP	argument for the use of liners and control mechanism. questions implementation and procedure	American Forest and Paper Association	none	
lpdp 32	IMP, SRC, GW modeling, GW monitoring	opposed to adoption of rule, arguments of implementation	FAA	none	
lpdp 33	IMP, SRC, TCLP	electric utility seeking exemption	South Carolina Electric And Gas Company	none	
lpdp 34	EI, IMP, SRC, GW monitoring	argument for the use of liners and control mechanism.	New Hanover County Dep. Of Enviro. Management	yes	four sampling events of Pb concentration and pH values. All Pb < 0.003, High pH = 8.03, low = 7.51
lpdp 35	GW Monitoring, GW Modeling, TSCA	question the validity of science used to make regulation	Metro Waste Authority, Des Moines, Iowa	none	
lpdp 36	EI, GW Monitoring, SRC, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills	General Motors	none	
lpdp 37	EI, IMP, SRC	effect on the reuse/salvage industry. discussion of validity of requirement examine the total impact on both human health and the environment	Used Building Materials Association	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**
lpdp 38	GW Modeling, SRC, IMP, RCRA, TCLP	arguments against enactment, Conflicts with RCRA,	Alliance for Safe and Responsible Lead Abatement	yes	Bar plot of Leachable Pb vs pH. TCLP results of Pb = 54.26(units?), 22.0 ppm, 130 ppm
lpdp 39	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	
lpdp 40	EI, SRC	economic impact of implementation	County of Fresno	none	

lpdp L1	IMP, RCRA, TSCA, TCLP, SRC	electric utilities should be exempt	Central And South West Services	none	
lpdp L2	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.

APPENDIX E. TSCA/RCRA Economic Impact Comments

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. TSCA Economic Impact Comments

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-007	EI	effect on the reuse/salvage industry	DOD	none	
C1-012	IMP, EI	economic impact on Islands	County of Maui	none	
C1-017	IMP, EI	shortage of C and D landfills. economic impact	North East Nebraska Solid Waste Coalition	none	
C1-018	EI	development of affordable housing	Share Associates	none	
C1-021	EI, RCRA	economic impact of implementation. shortage of C and D landfills	State of Iowa	none	
C1-022	EI, TSCA, RCRA	economic impact of implementation. shortage of C and D landfills	National Association of Home Builders	none	
C1-023	EI, IMP	effect on the reuse/salvage industry	DeConstruction Services	none	
C1-024	IMP, EI	request for disposal in subtitle D landfills only	DNR(DEQ) MO	yes	pH = 6.3 to 7.3. No quantitative number of samples or dates given
C1-029	EI, IMP	effect on the reuse/salvage industry	Pueblo Depot Activity Development Authority	none	
C1-032	EI	effect on the reuse/salvage industry	DeConstruction Services	none	
C1-033	EI	effect on the reuse/salvage industry. quicker action.	Just a Start Corp	none	
C1-037	EI	effect on the reuse/salvage industry	Habitat for Humanity	none	
C1-040	EI,	effect on the reuse/salvage industry. quicker action.	The ReBuilding Center	none	
C1-042	EI	effect on the reuse/salvage industry. quicker action.	Dave Acherman	none	
C1-048	IMP, EI	support of regulation, added exclusions	City of Cambridge	none	
C1-049	EI	effect on the reuse/salvage industry. quicker action.	Portland OR Metro Regional Gov	none	
C1-050	EI	effect on the reuse/salvage industry. quicker action.	Construction Recycling Systems, Inc	none	
C1-051	EI, IMP, TSCA, RCRA	implementation of procedure	Ford Motor Company	none	
C1-055	IMP, EI	arguments against the exclusion of C and D waste in MSWLF	Town of Colonie, NY	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-056	TCLP, RCRA, EI	effect on the reuse/salvage industry	National Association of Demolition Contractors	none	
C1-060	EI, TSCA, RCRA	economic impact of implementation. shortage of C and D landfills	Missouri Chapter of Solid Waste Association of North America	none	
C1-061	EI, TCLP, GW Modeling	economic impact of implementation . Suggest that GW modeling supports the possibility of contamination of down-gradient drinking wells is remote	MidAmerician Energy	none	
C1-062	EI, SRC	economic impact of implementation. Conditions in MSWLF are not "highly" acidic	Randazzo Ent. Inc	yes	pH from lined landfills is 6.1 to 6.8
C1-063	EI, TCLP	effect on the reuse/salvage / transport industry	Jet-A-Way, Inc.	none	
C1-064	SUP, TCLP, RCRA, EI	support of regulation, added exclusions, economic impact	National Center for Lead-Safe Housing	none	
C1-065	EI	effect on the reuse/salvage industry	Ciminelli Services Corp.	none	
C1-066	EI	economic impact of implementation on islands	County of Kauai HI	none	
C1-067	EI, GW Modeling	oppose the exclusion of LPBCD in MSW	State of Colorado HM/WM	none	
C1-068	EI, IMP	effect on the reuse/salvage / transport industry	Construction Materials Recycling Association	none	
C1-069	EI, SRC	opposed to the regulation. Arguments for allowing LBP in MSWLF.	Harrison County Solid Waste Authority WV	none	
C1-072	EI, IMP	effect on the reuse/salvage industry	Saturday Construction Salvage	none	
C1-073	EI, SRC, SPLP, TCLP	effect on the private MSW industry. Erroneous assumption of acidic leachate and TCLP	National Solid Wastes Management Association	yes	pH = 6.94 from 13 MSWLF and 138 samples. pH of 7 from C and D LFs. Correlation plots of pH and Pb, pH and LF type
C1-074	EI, SRC, RCRA, TSCA, TCLP	effect on the MSW operation. Erroneous assumption of acidic leachate and TCLP	County of San Jouquin	yes	pH = 6.4 from 25 samples over four years with a low of 6.0 and a high of 7.3
C1-075	EI	effect on the reuse/salvage / transport industry	California Bio-Mass, Inc	none	
C1-076	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

C1-077	EI	effect on the reuse/salvage industry	The Environmental Information Association	none	
C1-078	EI, IMP	economic impact of implementation. shortage of C and D landfills	South Carolina DoH/EC	yes	Levels of lead tests used that trigger action (Total Lead > 0.06% or X-ray Fluorescence of >0.7 mg/cm^2
C1-083	EI	effect on the reuse/salvage industry	L. Schaller, M. Armstrong	none	
C1-084	EI	effect on the reuse/salvage industry	Edgerton Contractors Inc.	none	
C1-085	EI, GW Monitoring, SRC, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills	General Motors	none	
C1-086	EI, IMP	utilities provider seeking exemption	Texas Utilities Services	none	
C1-089	EI	effect on the reuse/salvage industry	Global Waste Recycling Inc.	none	
C1-091	EI, IMP	implementation of procedure, argument against excluding LBP from MSWLF,questions of economic impact, flexibility, recycling, and contradictions	NJ DEP	yes	pH near neutral
C1-092	IMP, EI, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Solid Waste Association of North America	yes	pH = 6.1 to 6.8 from 35 samples over a 3 year period
C1-097	EI, SRC	effect on the reuse/salvage industry.Concrete crushing and recycling for use in road beds	anonymous	none	
C1-101	EI, IMP	effect on the reuse/salvage industry	Continental Biomass Industries	none	
C1-102	IMP, SRC, EI, TSCA, RCRA	comments and clarification of the provisions. Arguments for the effectiveness of liners and leachate recovery systems	CT DEP	none	
C1-103	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills, pH conditions inside the LF	Development Authority of the North Country, Rodman NY	yes	pH = 6.73 current average for all facilities
C1-104	EI	effect on the reuse/salvage industry, wastes that come from natural disasters	J. Edwards and Associates, Inc	none	
C1-105	IMP, SRC, EI, TSCA	comments and clarification of the provisions. The fate of demolition of buildings with LBP	G.E.	none	
C1-108	EI, SRC	municipality seeking exemption. Arid conditions affect the source	City of Bolder NV	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-109	EI, GW Analysis, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	NV Division of Environmental Protection	none	
C1-110	EI	effect on the reuse/salvage industry. Concrete crushing and recycling for use in road beds	B And H Sales Corp.	none	
C1-111	EI, IMP, SRC, TCLP, RCRA	argument for the use of liners and control mechanism. questions implementation and procedure. Impact on recycling	Kings County WA	none	
C1-113	EI, GW Monitoring, SRC, RCRA, TCLP	economic impact of implementation. shortage of C and D landfills	Municipality of Anchorage Solid Waste Services	yes	Lead leachate has been: ND 27.4%, exceeded EPA standards 8.3% in the past 11 years. Max Pb 0.1090mg/L
C1-114	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills argument for the use of liners and control mechanism.	Kern County Waste Management Dep, CA	none	
C1-115	EI, IMP, SRC, GW Modeling, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	State of Vermont	yes	data from 1992 to 1999. 74% (63) of samples were ND, 11% (9) were above DL but below MCL, 15% (13) were above MCL. pH generally between 6 - 7
C1-116	EI, IMP, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	US EPA Region 1	none	
C1-117	EI, SRC, RCRA	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	Nebraska DEQ	none	
C1-118	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills	Solid Waste Association of North America, Nebraska	yes	Plot of pH, Pb concentration vs time for a 750 TPD MSWLF operating since 1989
C1-119	EI, SRC, TCLP, SPLP	economic impact of implementation. shortage of C and D landfills	City of York, Nebraska	none	
C1-122	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation	WasteManagement	yes	missing leachate report

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-123	EI, GW Monitoring, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, source conditions don't support TCLP assumptions	NH DES	yes	pH in the range of 6-7, tabular form of pH and Pb concentrations for four MSWLFs
C1-124	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation, LBP in MSWLFs does not constitute an exposure pathway for children	Association of State and Territorial Solid Waste Management Officials	yes	pH in the range of 6-7
C1-125	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Association of State and Territorial Solid Waste Management Officials	none	
C1-126	EI, IMP, SRC, RCRA	US Post Office seeking exemption to regulations	US Post Office	none	
C1-128	IMP, SRC, EI, TSCA, RCRA, TCLP	electric utilities should be exempt, arguments of validity of TCLP and source assumptions	Pacific Gas and Electric	none	
C1-130	EI	effect on the reuse/salvage industry	Global Waste Recycling Inc.	yes	two articles on the benefits of recycling
C1-131	EI, SRC, GW Monitoring, IMP	arguments against enactment, question the adequacy of EPA studies	OR DHR	none	
C1-132	IMP, SRC, EI, TSCA, TCLP	electric utilities should be exempt	Public Service Electric and Gas Company	none	
C1-133	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Solid Waste Association of North America, Alaska	yes	Citing from EPA Factbook as to the total amount of Pb in MSW
C1-134	EI, SRC	economic impact of implementation	County of Fresno	none	
C1-136	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry. General attack on the science	Rodchester Environmental Park	none	
C1-137	EI, GW Monitoring, SRC	economic impact of implementation. Questions the science of regulation	Snohomish County, WA	yes	pH of 6.6 in leachate
C1-138	EI	economic impact of implementation. shortage of C and D landfills	Kenai Peninsula Burough Solid Waste Dep	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-139	EI	effect on the reuse/salvage industry	Community Recycling and Resource Recovery, Inc.	none	
C1-141	EI, GW Monitoring	economic impact of implementation. shortage of C and D landfills	County of Sonoma	yes	"Testing results of our leachate indicate that the pH is neutral ……"
C1-142	EI, SRC, RCRA, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, natural alkalinity of soil	Clark County, NV	none	
C1-143	EI, SRC	Economic impact due to lack of C and D landfills, impact on the reuse/recycling community	L. R. Higgins, Inc	none	
C1-144	EI, SRC, GW Monitoring, IMP, TCLP	arguments for changes to the implementation, more state control, analysis ignored the function of liners	Florida Dep of Env. Protection	yes	pH typically 4.7 to 7.7. Methane producing phase produces pH of 6.3 to 8.8. HELP model results and lab results in a table format
C1-145	EI, SRC, GW Monitoring, GW Modeling, IMP, TSCA, TCLP	DOE seeking to address low level radio active LBP wastes, compliance and implementation comments	DoE	none	
C1-146	EI, GW Monitoring, SRC	economic impact of implementation. shortage of C and D landfills	County of Santa Barbra, Public Works	yes	Pb in monitoring wells closest to LF 12 ppb
C1-148	EI, SRC	effect on the reuse/salvage industry	Washington State Recycling Association	none	
C1-149	EI, GW Monitoring, SRC, RCRA	economic impact of implementation. shortage of C and D landfills	Environmental Services Joint Powers Authority	none	
C1-150	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	County Sanitation Districts of Los Angles County	yes	Pb = 0.06, 0.03, 0.05 mg/L, pH 6.31 - 8.39 median 7.49. Monthly pH and Pb results from 1990 though 1996 for two LFs
C1-151	EI, SRC, GW Monitoring, RCRA, TSCA	clarification of technical issues. Exclusion of C and D waste from MSW landfills	NY Dep of Env Conservation	yes	Leachate quality data from several MSW and C and D LFs in table form
C1-152	EI, SRC	effect on the reuse/salvage industry	Wood Recycling, Inc.	yes	Pb content of hydromulch (recycled wood product) 0.306 mg/L

C1-153	EI, SRC, GW Monitoring, TCLP	argument for the use of liners and control mechanism	Pima-Maricopa Indian Community, Salt River AZ	yes	1 out of 14 samples tested for Pb at 0.052 mg/L
C1-154	EI, GW Monitoring	economic impact of implementation. shortage of C and D landfills	County of Sonoma, Dep of Trans and Public Works	none	
C1-155	EI, SRC, TCLP	effect on the reuse/salvage industry	Western Recycling, Inc.	none	
C1-156	EI, SRC	effect on the reuse/salvage industry	Specialty Crushing, Inc.	none	
C1-157	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt, arguments of validity of TCLP and source assumptions, impact of catastrophic events	Pacific Gas and Electric	none	
C1-158	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	University of CA Santa Cruz	none	
C1-159	EI, SRC	effect on the reuse/salvage industry	Eagle Crusher Company of Galion	none	
C1-160	EI, SRC	effect on the reuse/salvage industry	American Waste Industries	none	
C1-162	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, soil conditions in arid regions	City of San Diego, Env Services Dep	yes	pH ranged from 6.5 to 7.6, Pb of 0.14
C1-163	EI, SRC	effect on the reuse/salvage industry	Reuse Development Organization, NY Office of Recycling Market Development	none	
C1-165	EI, SRC, GW Monitoring	copy of C1-150	County Sanitation Districts of Los Angles County	yes	copy of C1-150
C1-167	EI, SRC, GW Monitoring, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills, question the validity of assumptions in TCLP	City of Tucson Solid Waste Management Dep	yes	Sampling of leachate typically shows pH of 6.8 with a low of 6.54, Pb = 0.016 mg/L
C1-169	EI, IMP, SRC, RCRA	Copy of C1-126	US Post Office	none	
C1-170	EI, SRC, TCLP	economic impact to cities with closed military bases. No C and D landfills	City of Seaside, CA	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-171	EI, SRC, TCLP	request clarification of the types of wastes and consideration of expanding the coverage of C and D waste	The Painting and Decorating Contractors of America	none	
C1-172	EI, SRC, TSCA, RCRA	effect on the reuse/salvage industry	Institute of Scrap Recycling Industries, Inc.	none	
C1-173	EI	effect on the reuse/salvage industry	Global Waste Recycling Inc.	none	
C1-174	EI, SRC, GW Monitoring, IMP, TSCA, RCRA, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	normal Waste Systems, INC.	yes	pH values from 52 landfills fringed from 6.2 - 9. Background Concentrations of Pb were less than 0.1mg/L. In a separate study of 30 LFs pH ranged from 5.9 - 8.4 with a mean of 7.0. Pb concentrations range from 0.002 - 1.5 mg/L
C1-176	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	Environmental Resource Return Corp.	none	
C1-177	EI, SRC, GW Monitoring	argument for the use of liners and control mechanism. Questions the validity of the leachability of Pb in MSW landfill	Delaware Solid Waste Authority	yes	pH values of 6.0 to 7.5
C1-178	EI, GW Monitoring, SRC	copy of C1-114	Kern County Waste Management Dep, CA	none	
C1-179	EI, SRC	effect on the reuse/salvage industry	RE Store	none	
C1-180	EI, SRC, GW Monitoring, TCLP	copy of C1-153	Pima-Maricopa Indian Community, Salt River AZ	yes	copy of C1-153
C1-181	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt	Duke Power Company	none	
C1-183	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Parish of Jefferson, Louisiana	yes	Samples collected quarterly since 1996. 9 of 12 samples ND (<0.003mg/L). Highest Pb of 0.014 mg/L. Lowest pH = 6.9, usually 7.5 - 8.5
C1-186	EI, IMP	copy of c1-091	NJ DEP	yes	copy of c1-091

C1-187	EI, GW modeling	effect on the reuse/salvage industry. Suggest that the EPA look further into recovery options and re-examine the effects of the proposed rule on potential recovery	NC Div of Pollution Prevention and Env. Assistance	none	
C1-188	IMP, EI, SRC	Copy of C1-092	Solid Waste Association of North America	yes	Copy of C1-092
C1-189	EI, SRC	copy of C1-148	Washington State Recycling Association	none	
C1-190	EI, SRC	effect on the reuse/salvage industry	Bureau of Sanitation of the City of Los Angeles	none	
C1-191	EI, SRC, PROC	effect on the reuse/salvage industry	smillian	none	
C1-192	EI, SRC	effect on the reuse/salvage industry, Consumer information and Labeling	Second Use Building Materials	none	
C1-194	EI, IMP, GW modeling, RCRA, TSCA, TCLP, SRC	discussion of exceptions to implementation, future analysis required	Dep of Health, OSW	none	
C1-195	EI, IMP	effect on the reuse/salvage industry	J. Sununu, House of Representatives, 1st District NH	none	
C1-196	EI, IMP	effect on the reuse/salvage industry. Disposal of LBP debris as Household waste, recycling of LBP debris	CA Integrated Waste Management Board	none	
C1-200	EI, IMP, SRC	effect on the reuse/salvage industry. discussion of validity of requirement examine the total impact on both human health and the environment	Used Building Materials Association	none	
C1-201	EI, TCLP, SRC, GW modeling, GW monitoring	effect on the reuse/salvage industry, Invalid standard for source, reference to HWIR Proceedings, DAF may be as high as 5000 not 100 as used. Should incorporate Pb bearing soils	Lead Industries Association, Inc.	none	
C1-202	EI	effect on the reuse/salvage industry	Construction Materials Recycling Association	none	
C1-203	EI	effect on the reuse/salvage industry	New England Ecological Development	none	
C1-204	EI, TCLP	effect on the reuse/salvage industry	City of Little Rock AR, Dep of Public Works	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

C1-205	EI, IMP	argument for the use of liners and control mechanism. questions implementation and procedure	Mississippi Dep of Env. Quality	none	
C1-206	EI, IMP	effect on the reuse/salvage industry	Central Construction and Demolition Recycling, INC.	none	
C1-207	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Anne Arundel County, MD	yes	Leachate from one LF "... pH generally ranges from 6.5 - 7"
C1-208	EI, IMP	effect on the reuse/salvage industry	U.S. Recycling and Wrecking, inc.	none	
C1-209	EI, IMP	effect on the reuse/salvage industry	G.L. Williams and Son Trucking, Inc.	none	
C1-210	EI, IMP	argument for the use of liners and control mechanism. questions implementation and procedure	Scott Area Solid Waste Management Commission, Iowa	yes	"We have found our pH levels to be approximately neutral"
C1-211	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	ICONCO	none	
C1-213	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.
C1-214	EI, IMP, SRC, GW Monitoring	argument for the use of liners and control mechanism. questions implementation and procedure	Northeast Maryland Waste Disposal Authority	yes	Average pH ranged form 6.70 to 8.75. Tabulated pH results from four years fortwo LFs

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. RCRA Economic Impact Comments

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
lpdp 14	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt	Utility Solid Waste Activities Group	none	
lpdp 15	EI, SRC, IMP, TCLP, TSCA, RCRA	effect on the reuse/salvage industry, question of storage, potential confusion in implementation, failure to study the practice of recycling of concrete	GE	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

lpdp 17	EI	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	Allegheny County Dep. Of Public Works	none	
lpdp 18	EI, IMP, SRC, GW modeling, TCLP, RCRA, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure. "… Proposal is based on faulty technical assumptions regarding landfill leachate…"	Waste Management	yes	Tabulated results of Pb concentrations from several monitoring wells from several LFs
lpdp 21	EI, IMP, SRC, GW monitoring, RCRA, TCLP, SPLP	argument for the use of liners and control mechanism. questions implementation and procedure. Issues of catastrophic events and the lack of design criteria for C and D LFs. Comments With Economic Impact.	ASTSWMO	yes	pH ranges form 6-7 not 5 as assumed by the tests
lpdp 23	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt. Clarification and amendments to the rule	Pacific Gas and Electric	none	
lpdp 28	EI, TCLP, SRC, GW modeling, GW monitoring	effect on the reuse/salvage industry, Invalid standard for source, reference to HWIR Proceedings, DAF may be as high as 5000 not 100 as used. Should incorporate Pb bearing soils	Lead Industries Association, Inc.	none	
lpdp 34	EI, IMP, SRC, GW monitoring	argument for the use of liners and control mechanism.	New Hanover County Dep. Of Enviro. Management	yes	four sampling events of Pb concentration and pH values. All Pb < 0.003, High pH = 8.03, low = 7.51
lpdp 36	EI, GW Monitoring, SRC, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills	General Motors	none	
lpdp 37	EI, IMP, SRC	effect on the reuse/salvage industry. discussion of validity of requirement examine the total impact on both human health and the environment	Used Building Materials Association	none	
lpdp 39	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	
lpdp 40	EI, SRC	economic impact of implementation	County of Fresno	none	
lpdp L2	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.

APPENDIX F. TSCA/RCRA Implementation Comments

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. TSCA Implementation Comments

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-001	SRC, IMP, RCRA	dispute effect of LBPCD in MSW. impact on rural communities not considered. impact of procedure oppressive.	Kansas Dep of Health and Env	none	
C1-002	IMP, RCRA, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure	ME DEP	none	
C1-010	IMP	implementation of procedure	Utility Solid Waste Activity Group	none	
C1-012	IMP, EI	economic impact on Islands	County of Maui	none	
C1-013	IMP	argument for the use of liners and control mechanism. questions implementation and procedure	R. Wardwell Geotech and GW Engineer	none	
C1-014	IMP, TCLP	argument for the use of control mechanism. questions implementation and procedure	Fort Ord Reuse Authority	none	
C1-015	IMP, RCRA	pro and con (support) of implementation	Alliance to End Childhood Lead Poisoning	none	
C1-016	IMP, TCLP	shortage of C and D landfills	Douglas County (NE) Env. Serv.	yes	TCLP test results of leachate show no detectable levels of lead. No quantifiable levels or dates given.
C1-017	IMP, EI	shortage of C and D landfills. economic impact	North East Nebraska Solid Waste Coalition	none	
C1-019	IMP, SRC, SPLP, GW Modeling, RCRA, TCLP	shortage of C and D landfills, implementation	State of Illinois	none	
C1-023	EI, IMP	effect on the reuse/salvage industry	DeConstruction Services	none	
C1-024	IMP, EI	request for disposal in subtitle D landfills only	DNR(DEQ) MO	yes	pH = 6.3 to 7.3. No quantitative number of samples or dates given
C1-029	EI, IMP	effect on the reuse/salvage industry	Pueblo Depot Activity Development Authority	none	
C1-038	IMP	clarification of definitions	NC Dep Heath and Human Services	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-043	IMP, SRC	opposed to the regulation. Comments on sources of LPB in Poisoning of children	Washington Poison Center	none	
C1-044	IMP	opposed to the regulation. clarification of rules	Raymond Fahey	none	
C1-045	IMP	implementation of procedure	Road Island DOH/DEM	yes	dust and soil is responsible for levels in excess of 10 ug/dL
C1-047	IMP	implementation of procedure	Road Island DEM	none	
C1-048	IMP, EI	support of regulation, added exclusions	City of Cambridge	none	
C1-051	EI, IMP, TSCA, RCRA	implementation of procedure	Ford Motor Company	none	
C1-055	IMP, EI	arguments against the exclusion of C and D waste in MSWLF	Town of Colonie, NY	none	
C1-068	EI, IMP	effect on the reuse/salvage / transport industry	Construction Materials Recycling Association	none	
C1-070	IMP, TCLP, GW Monitoring	economic impact of implementation and exclusion of LBP in MSWLF. shortage of C and D landfills	State of Nebraska	yes	pH of leachate in the range of 6-7 from MSWLF owner/Operators
C1-072	EI, IMP	effect on the reuse/salvage industry	Saturday Construction Salvage	none	
C1-076	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	
C1-078	EI, IMP	economic impact of implementation. shortage of C and D landfills	South Carolina DoH/EC	yes	Levels of lead tests used that trigger action (Total Lead > 0.06% or X-ray Fluorescence of >0.7 mg/cm^2
C1-079	SRC, IMP, SPLP, TCLP	dispute effect of LBPCD in MSW.	Superior Services	yes	several pH and Pb test results from 1994 to 1998
C1-080	IMP	argument for the use of liners and control mechanism. questions implementation and procedure	Florida, Orange County Solid Waste Management	none	
C1-081	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Maryland's Solid Waste Program	none	
C1-082	IMP	set stricter reporting limits. Cancer survivor	Kathy Grimes	none	
C1-086	EI, IMP	utilities provider seeking exemption	Texas Utilities Services	none	
C1-087	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	UT Davis County Solid Waste Management	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-088	IMP, SRC, TCLP	argument for the use of liners and control mechanism. questions implementation and procedure	American Forest and Paper Association	none	
C1-090	IMP, TSCA, GW analysis	implementation of procedure	Rouse Company	none	
C1-091	EI, IMP	implementation of procedure, argument against excluding LBP from MSWLF, questions of economic impact, flexibility, recycling, and contradictions	NJ DEP	yes	pH near neutral
C1-092	IMP, EI, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Solid Waste Association of North America	yes	pH = 6.1 to 6.8 from 35 samples over a 3 year period
C1-093	GW Modeling, SRC, IMP, RCRA, TCLP	arguments against enactment, Conflicts with RCRA,	Alliance for Safe and Responsible Lead Abatement	yes	Bar plot of Leachable Pb vs pH. TCLP results of Pb = 54.26(units?), 22.0 ppm, 130 ppm
C1-094	IMP, SRC, TCLP	electric utility seeking exemption	South Carolina Electric And Gas Company	none	
C1-095	IMP, TSCA, RCRA	review of regulation, specific clarification of text, Naturally acidic course conditions	AK DEQ	none	
C1-096	IMP, SRC, GW Modeling, GW analysis	review of regulation	US Dep. Of Housing and Urban Development	none	
C1-098	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure. Liming technique used in daily cover to buffer pH	NJ Middlesex County Utilities Authority	none	
C1-099	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	TN Dep of Env. And Conservation	none	
C1-100	IMP, TCLP	comments and clarification TCLP procedure is unclear and difficult and results are not reproducible	CT DPH	none	
C1-101	EI, IMP	effect on the reuse/salvage industry	Continental Biomass Industries	none	
C1-102	IMP, SRC, EI, TSCA, RCRA	comments and clarification of the provisions. Arguments for the effectiveness of liners and leachate recovery systems	CT DEP	none	
C1-105	IMP, SRC, EI, TSCA	comments and clarification of the provisions. The fate of demolition of buildings with LBP	G.E.	none	
C1-106	GW Modeling, IMP	comments on modeling uncertainties	NJ Dep of Community Affairs	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-107	IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	CH2MHILL / SWANA	none	
C1-111	EI, IMP, SRC, TCLP, RCRA	argument for the use of liners and control mechanism. questions implementation and procedure. Impact on recycling	Kings County WA	none	
C1-115	EI, IMP, SRC, GW Modeling, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	State of Vermont	yes	data from 1992 to 1999. 74% (63) of samples were ND, 11% (9) were above DL but below MCL, 15% (13) were above MCL. pH generally between 6 - 7
C1-116	EI, IMP, SRC, TCLP	economic impact of implementation. shortage of C and D landfills, questions of validity of science (in general terms) used	US EPA Region 1	none	
C1-122	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation	WasteManagement	yes	missing leachate report
C1-124	EI, SRC, GW Monitoring, IMP, TCLP, TSCA, RCRA	multiple arguments against adoption of regulation, LBP in MSWLFs does not constitute an exposure pathway for children	Association of State and Territorial Solid Waste Management Officials	yes	pH in the range of 6-7
C1-126	EI, IMP, SRC, RCRA	US Post Office seeking exemption to regulations	US Post Office	none	
C1-127	IMP, TSCA, RCRA	arguments of jurisdiction	Reliant Energy, Houston Industries Incorporated	none	
C1-128	IMP, SRC, EI, TSCA, RCRA, TCLP	electric utilities should be exempt, arguments of validity of TCLP and source assumptions	Pacific Gas and Electric	none	
C1-131	EI, SRC, GW Monitoring, IMP	arguments against enactment, question the adequacy of EPA studies	OR DHR	none	
C1-132	IMP, SRC, EI, TSCA, TCLP	electric utilities should be exempt	Public Service Electric and Gas Company	none	
C1-135	SRC, IMP, DTSC	arguments of source definitions, LBP structures are not considered hazardous waste as per DTSC	normal Waste Systems, INC.	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-136	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry. General attack on the science	Rodchester Environmental Park	none	
C1-144	EI, SRC, GW Monitoring, IMP, TCLP	arguments for changes to the implementation, more state control, analysis ignored the function of liners	Florida Dep of Env. Protection	yes	pH typically 4.7 to 7.7. Methane producing phase produces pH of 6.3 to 8.8. HELP model results and lab results in a table format
C1-145	EI, SRC, GW Monitoring, GW Modeling, IMP, TSCA, TCLP	DOE seeking to address low level radio active LBP wastes, compliance and implementation comments	DoE	none	
C1-157	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt, arguments of validity of TCLP and source assumptions, impact of catastrophic events	Pacific Gas and Electric	none	
C1-158	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	University of CA Santa Cruz	none	
C1-166	IMP, TCLP	arguments about the effects / complications of implementation	OR Dep. Of Env. Quality	none	
C1-169	EI, IMP, SRC, RCRA	Copy of C1-126	US Post Office	none	
C1-174	EI, SRC, GW Monitoring, IMP, TSCA, RCRA, TCLP	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	NorCal Waste Systems, INC.	yes	pH values from 52 landfills fringed from 6.2 - 9. Background Concentrations of Pb were less than 0.1mg/L. In a separate study of 30 LFs pH ranged from 5.9 - 8.4 with a mean of 7.0. Pb concentrations range from 0.002 - 1.5 mg/L
C1-176	EI, SRC, GW Monitoring, IMP	effect on the reuse/salvage industry	Environmental Resource Return Corp.	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-181	IMP, SRC, EI, GW Monitoring, TSCA, RCRA	electric utilities should be exempt	Duke Power Company	none	
C1-183	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Parish of Jefferson, Louisiana	yes	Samples collected quarterly since 1996. 9 of 12 samples ND (<0.003mg/L). Highest Pb of 0.014 mg/L. Lowest pH = 6.9, usually 7.5 - 8.5
C1-184	IMP, SRC, TCLP	argument for the use of liners and control mechanism and source leachability	N. Marker, Solid and Hazardous Waste Management Branch	yes	"A rather large database, including 100s of leachate samples…" pH range from 6 - 7.5
C1-186	EI, IMP	copy of c1-091	NJ DEP	yes	copy of c1-091
C1-188	IMP, EI, SRC	Copy of C1-092	Solid Waste Association of North America	yes	Copy of C1-092
C1-194	EI, IMP, GW modeling, RCRA, TSCA, TCLP, SRC	discussion of exceptions to implementation, future analysis required	Dep of Health, OSW	none	
C1-195	EI, IMP	effect on the reuse/salvage industry	J. Sununu, House of Representatives, 1st District NH	none	
C1-196	EI, IMP	effect on the reuse/salvage industry. Disposal of LBP debris as Household waste, recycling of LBP debris	CA Integrated Waste Management Board	none	
C1-198	IMP	argument for the use of liners and control mechanisms. Don't exclude LBP from MSW	Solid Waste District of Defiance, Fulton, Paulding, and Williams	yes	leachate characteristics test results from Defiance County LF. Tabulated data for Pb and pH
C1-199	IMP, RCRA, TSCA, TCLP, SRC	electric utilities should be exempt	Central And South West Services	none	
C1-200	EI, IMP, SRC	effect on the reuse/salvage industry. discussion of validity of requirement examine the total impact on both human health and the environment	Used Building Materials Association	none	
C1-205	EI, IMP	argument for the use of liners and control mechanism. questions implementation and procedure	Mississippi Dep of Env. Quality	none	
C1-206	EI, IMP	effect on the reuse/salvage industry	Central Construction and Demolition Recycling, INC.	none	

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-207	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	Anne Arundel County, MD	yes	Leachate from one LF "... pH generally ranges from 6.5 - 7"
C1-208	EI, IMP	effect on the reuse/salvage industry	U.S. Recycling and Wrecking, inc.	none	
C1-209	EI, IMP	effect on the reuse/salvage industry	G.L. Williams and Son Trucking, Inc.	none	
C1-210	EI, IMP	argument for the use of liners and control mechanism. questions implementation and procedure	Scott Area Solid Waste Management Commission, Iowa	yes	"We have found our pH levels to be approximately neutral"
C1-211	EI, IMP, SRC	argument for the use of liners and control mechanism. questions implementation and procedure	ICONCO	none	
C1-213	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.
C1-214	EI, IMP, SRC, GW Monitoring	argument for the use of liners and control mechanism. questions implementation and procedure	Northeast Maryland Waste Disposal Authority	yes	Average pH ranged form 6.70 to 8.75. Tabulated pH results from four years for two LFs

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. RCRA Economic Impact Comments

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
lpdp 14	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt	Utility Solid Waste Activities Group	none	
lpdp 15	EI, SRC, IMP, TCLP, TSCA, RCRA	effect on the reuse/salvage industry, question of storage, potential confusion in implementation, failure to study the practice of recycling of concrete	GE	none	
lpdp 17	EI	argument for the use of liners and control mechanism. Economic impact due to lack of C and D landfills	Allegheny County Dep. Of Public Works	none	
Comment ID	**Issue Code**	**Issue**	**Affiliation**	**Data**	**Remarks**

lpdp 18	EI, IMP, SRC, GW modeling, TCLP, RCRA, TSCA	argument for the use of liners and control mechanism. questions implementation and procedure. "… Proposal is based on faulty technical assumptions regarding landfill leachate…"	Waste Management	yes	Tabulated results of Pb concentrations from several monitoring wells from several LFs
lpdp 21	EI, IMP, SRC, GW monitoring, RCRA, TCLP, SPLP	argument for the use of liners and control mechanism. questions implementation and procedure. Issues of catastrophic events and the lack of design criteria for C and D LFs. Comments With Economic Impact.	ASTSWMO	yes	pH ranges form 6-7 not 5 as assumed by the tests
lpdp 23	IMP, SRC, EI, TSCA, RCRA	electric utilities should be exempt. Clarification and amendments to the rule	Pacific Gas and Electric	none	
lpdp 28	EI, TCLP, SRC, GW modeling, GW monitoring	effect on the reuse/salvage industry, Invalid standard for source, reference to HWIR Proceedings, DAF may be as high as 5000 not 100 as used. Should incorporate Pb bearing soils	Lead Industries Association, Inc.	none	
lpdp 34	EI, IMP, SRC, GW monitoring	argument for the use of liners and control mechanism.	New Hanover County Dep. Of Enviro. Management	yes	four sampling events of Pb concentration and pH values. All Pb < 0.003, High pH = 8.03, low = 7.51
lpdp 36	EI, GW Monitoring, SRC, RCRA, TSCA	economic impact of implementation. shortage of C and D landfills	General Motors	none	
lpdp 37	EI, IMP, SRC	effect on the reuse/salvage industry. discussion of validity of requirement examine the total impact on both human health and the environment	Used Building Materials Association	none	
lpdp 39	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	
lpdp 40	EI, SRC	economic impact of implementation	County of Fresno	none	
lpdp L2	EI, IMP, SRC, TCLP, GW modeling, RCRA, GW monitoring	argument for the use of liners and control mechanism. questions implementation and procedure. States that flawed assumptions regarding pH cause the fate and transport models (as well as the TCLP) to churn out patently incorrect outcome…	BFI	yes	sites studies by Reinhart: pH in acid phase 4.7 - 7.7 and other phases ph = 6.3 -8.8, Tabulated test results of leachate Pb concentrations and pH.

APPENDIX G. TSCA/RCRA Procedure Comments

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. TSCA Procedure Comments

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
C1-003	PROC	request for review extension.	National Association of Demolition Contractors	none	
C1-004	PROC	request for review extension	Association of State and Territorial Solid Waste Management Officials	none	
C1-005	PROC	request for review extension	Utility Solid Waste Activity Group	none	
C1-006	PROC	request for review extension	The Alliance of Safe and Responsible Lead Abatement	none	
C1-008	PROC	request for review extension	Sec. Of Def	none	
C1-009	PROC	request for review extension	Utility Solid Waste Activity Group	none	
C1-011	PROC	request for review extension	BFI	none	
C1-020	PROC	request for review extension	Pollution Prevention and Toxics USEPA	none	
C1-076	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	
C1-191	EI, SRC, PROC	effect on the reuse/salvage industry	smillian	none	

Comments on Docket No. F 98-LBPD-FFFFF. Management and Disposal of Lead-Based Paint and Temporary Suspension of Toxicity Characteristic Rule for Specified Lead-Based Paint Debris. RCRA Procedure Comments

Comment ID	Issue Code	Issue	Affiliation	Data	Remarks
lpdp 2	PROC	request for more time to comment	Alliance for Safe and Responsible Lead Abatement	none	
lpdp 3	PROC	request for more time to comment	Battery Council International	none	
lpdp 4	PROC, TCLP, RCRA	request for more time to comment	ASTSWMO Solid Waste Subcommittee	none	
lpdp 5	PROC	request for more time to comment	Assistant Deputy Under Secretary of Defense, Environmental Quality	none	
lpdp 8	PROC	request for more time to comment	BFI	none	
lpdp 39	PROC, SRC, IMP, EI	dispute effect of LBPCD in MSW. Should not be implemented until studies are complete and assumptions validated	Texas Natural Resource Conservation Commission	none	

APPENDIX H. Summary of Municipal Solid Waste Landfill Data

Commenter	Data Type	Data Description	Data Values	Comments
C1-016 Douglas County	TCLP pH	TCLP results No pH data.	Commenter stated "*TCLP test results of leachate from Douglas County, Nebraska's MSW landfill show no detectable levels of lead.*	No information time or number of testing events
C1-024 Missouri Dep. Natural Resources	pH	Qualitative. No distribution information given.	Commenter stated "*The pH of MSW landfill leachate samples tested by department staff generally averages between 6.3 and 7.3..*"	No information time or number of testing events, sample size, or min and max values
C1-027 Mass. DEP				
Hingham Sanitary LF	lead	40 monitoring well samples, 25/40 non-detect	max=0.074 mg/l, min=0.011 mg/l, mean=0.038 mg/l	data from four sampling events in '94 and '95 10 monitoring well locations 2 surface water locations detection limit 0.01 mg/l
	lead	8 surface water samples, 4/8 non-detect	max=0.013 mg/l, min=0.011 mg/l, mean=0.012 mg/l	
Holbrook Sanitary LF	lead	27 monitoring well samples, 20/27 non-detect	max=0.48 mg/l, min=0.003 mg/l, mean=0.121 mg/l	data from two sampling events in '93 14 monitoring well locations 4 surface water locations no detection limit given
	lead	8 surface water samples, 6/8 non-detect	max=0.010 mg/l, min=0.006 mg/l, mean=0.008 mg/l	
Dartmouth (Russell Mills) LF	lead	48 monitoring wells, 42/48 non-detect	max=0.012 mg/l, min=0.004 mg/l, mean=0.008 mg/l	data from four sampling events in '94 and '95 12 monitoring well locations 3 surface water locations no detection limit given
	lead	9 surface water samples, 8/9 non-detect	max=0.0052 mg/l, min=0.0052 mg/l, mean=0.0052	
C1-052 Monterey Regional Waste Management District	lead pH	35 samples over 5 years, all non-detect 35 samples over 5 years	Commenter stated "*The strength of the leachate from the lined landfill ranges between a pH of 6.1 and 6.8 ....*"	No information on sample locations
C1-053 Taylor Recycling Facility	lead	TCLP test result	Commenter stated "*... levels are less than 1.0 mg/l and many time less than 0.005 mg/l...*"	No information on sample locations
C1-054 Michigan DEQ	lead pH	no lead concentration data leachate data from 49 LF	max=8.5 su, min=5.8 su, mean=7.02 su	
C1-057 Frederick Maryland, DPW	lead pH	3 leachate samples, 2/3 non-detect 1 pH sample	max=0.005 mg/l, min=0.005 mg/l, mean=0.005 pH=6.32	No information on sample locations. Small sample size.

Commenter	Data Type	Data Description	Data Values	Comments
C1-062 Randazzo, Inc.	lead pH	35 samples over 5 years, all non-detect 35 samples over 5 years	Commenter stated "*The strength of the leachate from the lined landfill ranges between a pH of 6.1 and 6.8 ....*"	No information on sample locations
C1-070 State of Nebraska	lead pH	No lead concentration values given. Feedback from owner operators on pH values	Commenter stated " *...indicate the pH of MSWLF leachate may be more in the range of 6-7.*"	No information on sample locations or sample size.
C1-071 apresgraves@woodard curran.com	lead pH	Qualitative information only.	Commenter stated "*From all the leachate characterization data I have seen, lead is not a major problem in landfill leachate.*"	No data provided to back up this claim
C1-073 National Solid Wastes Management Association	lead pH	pH and lead concentrations for 140 leachate samples from 19 LF. 138 pH samples from 13 MSWLF	Commenter stated "*From the figure (graph of lead and pH) a correlation does not exist between pH and lead concentrations..*" "*Leachate from some 138 samples collected at 13 MSWLF was 6.94."*	
C1-074 County of San Joaquin DPW	lead pH	No lead data 25 leachate samples over four years	max=7.3 su, min=6.0 su, mean=6.4 su.	Leachate collection data from subtitle D landfill. No discrete values given, only statistics
C1-079 Superior Special Services	lead pH	13 leachate samples 6/13 non-detect 46 leachate samples	max=1.65 mg/l, min=0.001 mg/l, mean=0.241 mg/l max=8.07 su, min=4.6 su, mean=6.79 su.	
C1-091 State of New Jersey	lead pH	No lead data reported Qualitative information only	Commenter stated "*...reporting a pH near neutral.*"	No information on sample location, size, or date.
C1-092 Solid Waste Association of North A.	lead pH	No lead data reported pH given in a range from 35 samples taken over a three-year period.	Commenter stated "*...strength of leachate collected from their lined landfill ranges between a pH of 6.1 and 6.8,..*"	Leachate collection data from subtitle D landfill. No discrete values given, only range of pH.
C1-093 ASRLA	lead pH	Graphic showing lead leachability vs pH values	The figure show a decrease in the leachability beginning at a pH 7.5, and a pH of at least 8.0 and less than 11.5	This figure was included as an attachment and was taken from USACERL TR 96/20 (figure 8)
C1-103 Development Authority of the North County	lead pH	No lead data given pH data given in a range	Commenter stated "*The current average pH for all operating landfill cells at this facility is approximately 6.7,..*"	No information on sample location, size, or date.
C1-113 Municipality of Anchorage	lead pH	Qualitative data only No pH information given	Commenter stated "*In the samples taken of the leachate since 1988, lead has been non-detected in 32.4% of the samples and the leachate's lead content has never exceeded the Drinking Water Standard.*"	

Commenter	Data Type	Data Description	Data Values	Comments
C1-115 State of Vermont	lead pH	Qualitative data only	Commenter stated "*63 of the 84 (74%) leachate samples were below detection limits for lead, nine (11%) were above detection limits but below the <MCL>, and 13 (15%) were above <MCL>. The pH of the leachate from each facility is generally between 6 - 7 s.u.*"	
C-118 SWANA	lead pH	lead and pH presented in graphical form	The figure shows a pH that ranges between 5.5 - 7. The mean value is ~6.5. Lead concentrations are mostly non-detect with only four values above 0.015 mg/l.	The data is from a MSW LF starting in '89 and ending in '98.
C1-123 State of New Hampshire DES	lead pH	14 lead leachate samples. 8/14 non-detect 11 pH samples from leachate	max=0.069 mg/l, min=0.008 mg/l, mean=0.004 mg/l max=6.22 su, min=5.82 su, mean=6.04 su.	
C1-124 ASTSWMO	lead pH	No lead data given Qualitative pH data	Commenter stated "*.. the range of pH 6-7 ..*"	No information on sample location, size, or date.
C1-129 Ohio EPA	lead pH	29 lead leachate samples. 13/29 non-detect 17 pH leachate samples.	max=0.181 mg/l, min=0.003 mg/l, mean=0.044 mg/l max=8.15 su, min=6.11 su, mean=7.06 su.	32 MSW LF provided lead and/or pH leachate data
C1-137 Snohomish County	lead pH	No lead data provided pH values for two MSW landfills	6.9 and 6.6 s.u.	No information about sample size, location, or dates
C1-140 Prince George's County	lead pH	lead leachate data given in a range pH leachate data given in a range	0.015 to 0.053 ppm 6.5 to 7.0 s.u.	Data from two landfills. No information on sample location, size, or date.
C1-141 County of Sanoma	lead pH	No lead data provided Qualitative pH data	Commenter stated "*.. That the pH is neutral and is not acidic..*"	Information from one MSW LF that has operated since '71
C1-144 Florida DEP	lead pH	data from approximately 200 samples	max=.561 mg/l, min=.000073 mg/l, mean=.035 mg/l max=9.03 su, min=5.25 su, mean=7.0 su.	Data is from the past five to fourteen years.
C1-146 County of Santa Barbara	lead pH	Lab. analyses of a monitoring well close to LF. No pH data	lead concentrations of 12 ppb	No indication of sample size, date, or location.
C1-147 Des Moines County	lead pH	No lead data. Monthly leachate sampling of pH from 92' to present.	Commenter stated "*..Indicate a pH typicaly ranging between 7.5 and 8.7, with occasional readings as low as 7.0 and as high as 8.8*"	Data is provided in range values only. No indication of sample size, quality, or location.
C1-150 Los Angeles County Sanitation	lead pH	180 lead leachate samples 176/180 non-detect 180 pH leachate samples	max=0.06 mg/l, min=0.03 mg/l, mean=0.05 mg/l max=8.39 su, min=6.31 su, mean=7.49 su.	
C1-151 New York DEC	lead pH	43 lead leachate samples 22/43 non-detect 42 pH leachate samples	max=0.042 mg/l, min=0.001 mg/l, mean=0.010 mg/l max=10.21 su, min=6.3 su, mean=7.16 su.	

Commenter	Data Type	Data Description	Data Values	Comments
C1 -162 City of San Diego	lead pH	one value from one landfill rang of values from one landfill	0.014 mg/l 6.5 -7.6 s.u.	Data from one landfill, no indication of sample: size, date, location, or quality
C1-167 City of Tucson	lead pH	Qualitative summary of lead leachate and pH leachate	Commenter stated "*Monitoring of lead in leachate at local landfill finds only non-detection or insignificant levels. .... typical pH of 6.8 <s.u.> with a low of 6.54 <s.u.>*"	No indication of sample: size, date, location, or quality
C1-174 NORCAL	lead pH pH lead pH	lead leachate from 32 landfills pH data from 52 landfills pH data from 32 landfills from a study done by San Bernardino from a study done by San Bernardino	< 0.1mg/l pH values ranging from neutral to basic max=9.0, min=6.2 max=1.5 mg/l, min=0.002 mg/l, mean=0.2 mg/l max=8.4 s.u., min=5.9 s.u., mean=7.0 s.u.	Appendix B-1 containing supporting data was not included with comment.
C1-177 Delaware Solid Waste Authority	lead pH	Qualitative "From thousands of analytical tests of leachate" "From extensive experience"	Commenter stated "*levels of lead usually are bellow 50 ppb*" Commenter stated "*From our extensive experience, leachate from MSW landfills is not very acidic. It typically ranges from pH 6.0 to pH 7.5.*"	No information about sample size, location, or dates
C1-180 Salt River Landfill	lead pH	14 leachate samples, 13/14 non-detect analysis from 2 landfills	Value of 0.052 mg/l Commenter stated "*pH levels were all near neutral.*"	
C1-183 Jefferson Parish	lead pH	12 lead leachate samples, 9/12 non-detect pH data reported in a range	Commenter stated "*Highest concentration measured was 0.014 mg/l*" "*the typical range of pH is 7.5 to 8.5.*"	
C1-186 NJDEP	lead pH	No lead data Qualitative data only	Commenter stated "*..reporting a pH near neutral.*"	No information about sample size, location, or dates
C1-198 Solid Waste District of Defiance, Fulton, Paulding, Williams	lead pH	Lab results from one sampling event Lab results from one sampling event	lead < 2.0ug/l pH = 6.83 s.u.	
C1-207 Anne Arundel County	lead pH	No lead data pH value range	Commenter stated "*..leachate generally ranges a pH of 6.5 to 7.0.*"	No information about sample size, location, or dates
C1-210 Scott Area Solid Waste Management	lead pH	No lead data Qualitative data only	Commenter stated "*We have found our pH levels to be approximately neutral.*"	No information about sample size, location, or dates
C1-213 BFI	lead pH	1131 leachate database entries for lead 1833 leachate database entries for pH	mean=0.1965 mg/l, median=0.0230 mg/l, SD=.6792 mean=6.92 s.u., median=6.86 s.u. SD=0.6959 s.u.	No indication of non-detects or how they were included in the data set. No information on sample location or dates.

APPENDIX I. Summary of Construction and Demolition Landfill Data

Commenter	Data Type	Data Description	Data Values	Comments
C1-027, Mass. DEP				
Cohasset Heights LF	Lead	53 monitoring well samples, 47/53 are	max=0.004 mg/l, min=0.002 mg/l, mean=0.003	data from three dates in 1994 32 monitoring well locations 7 surface water locations 1 leachate tank 1 underdrawn tank Quantitative data
	Lead	12 surface water samples, 11/12 are non-	max=0.002 mg/l, min=0.002 mg/l, mean=0.002	
	Lead	3 leachate tank samples, 1/3 are non-	max=0.017 mg/l, min=0.004 mg/l, mean=0.011	
	Lead	3 underdrawn tank samples, 3/3 are non-	max=NA, min=NA, mean=NA	
	pH	No pH data		
Wilbraham Sanitary LF	Lead	16 monitoring well samples, 8/16 are	max=0.003 mg/l, min=0.001 mg/l, mean=0.002	Landfill was operated as MSW LF until 1985 data from two dates in 1994. Quantitative data
	Lead	4 surface water samples, 1/4 are non-	max=0.003 mg/l, min=0.001 mg/l, mean=0.002	
	Lead	9 monitoring well samples, 4/9 are non-	max=0.46 mg/l, min=0.015 mg/l, mean=0.163	data is from "old" monitoring wells for six dates from 80-92. Quantitative data
	pH	No pH data		
C1-151, NY DEC	Lead	65 leachate samples, 59/65 are non-	max=0.172 mg/l, min=0.005 mg/l, mean=0.041	from 8 locations over a five year period note: detection limit ranges from 0.01 mg/l to 0.001 mg/l.. Qualitative data
	pH	No pH data		
C1-053, Taylor Recycling Facility	Lead pH	Qualitative. No distribution information given. No pH data	Commenter stated "*The majority of the times levels are less than 1.0 mg/l, and many times less than 0.005,..*"	TCLP Test results from C&D recycling facility. Qualitative data
C1-113, Municipality of Anchorage SW Services	Lead pH	Qualitative No pH data	Commenter stated Over 11 year period "*lead leachate has been "non-detect" in 27.4% of the samples. .. exceeded the EPA drinking water standard in only 8.3% of samples"*	Municipality operating a mixed C&D (20%) and MSW landfill. Qualitative data
C1-153, Pima-Maricopa Indian Community	Lead pH	Qualitative No pH data	Commenter stated "*15(83%) had detectable lead concentrations....only detected lead in 1 out of 14 of our samples at a concentration of 0.052 mg/l...."*	Data from 18 un-named landfills. Qualitative data
C1-073, National SW Management Association	Lead pH	Figure of MSW and C&D LF with pH and lead concentration data in graphical form.		Unknown number of samples. Difficult to discern the individual data points. No time or location frame for when or where the samples were taken
C1-122, Waste Management Inc.	Lead pH	Summary of C&D Leachate Studies, J. Michael Clinch,Ph. D. for Ohio EPA; Waste Management, Inc., Leachate Report (selected sections). No pH data.		Attachments not included with the comment