

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75201-2733

June 25, 1991

Mr. Mark S. Coleman
Deputy Commissioner for
Environmental Health Services (0200)
Oklahoma State Department of Health
1000 Northeast Tenth Street
Oklahoma City, Oklahoma 73117-1299

Dear Mr. Coleman:

The Environmental Protection Agency (EPA) has reviewed the authorization application of the Oklahoma State Department of Health's (OSDH) non-Hazardous and Solid Waste Amendment (HSPA) Cluster V. This application was submitted to EPA via letter dated November 19, 1990, and a followup letter dated November 29, 1990.

EPA used the State Authorization Manual to review OSDH's application. The Attorney General's Statement, Revision Checklists, and Memorandum of Agreement (MOA) were satisfactory. However, since Oklahoma will not be authorized for HSPA in this application, reference to HSPA in the MOA should be removed in order to reflect the current State program. Attachment A lists deficiencies and errors found in the State's Program Description (PD).

For EPA to proceed with the authorization of this application, OSDH must address the deficiencies and errors noted in Attachment A by one of the following three methods:

1. Addendum to Application - OSDH may use an addendum that identifies the appropriate sections of the existing PD to be deleted, modified, and/or expanded. An addendum should be clearly identified as such in order to facilitate codification in Code of Federal Regulations (CFR) Part 272.
2. Updated Page Inserts - PD inserts may be used to update specific pages of the original application. All new pages should be clearly marked with a revision date and page numbers should correspond to the original text with alpha designations used where necessary (e.g. 11, 11-A, 11-B, etc.). A copy of an original page with partially lined out text can be used if appropriate.
3. New Program Description - The State may wish to revise its existing PD and submit the revision as a replacement for the current one.

Given the revisions needed in this application to address the EPA's comments, the EPA is suspending the application processing timeframe until a revised PD is submitted. This will also affect the EPA's processing of the Oklahoma non-HSWA Cluster VI, HSWA II application, as the PD will be applicable to both applications.

Please submit a revised PD within 30 days of the receipt of this letter. Should you have any questions, please contact me or have your staff call Dick Thomas or Janie Hernandez at (214) 655-6760.

Sincerely yours,

Allyn M. Davis

Allyn M. Davis, Director
Hazardous Waste Management Division (6H)

Enclosures

cc: Damon D. Wingfield, OSDH
Jimmy Givens, OSDH

Mr. Mark S. Coleman.
Deputy Commissioner for
Environmental Health Services (0200)
Oklahoma State Department of Health
1000 Northeast Tenth Street
Oklahoma City, Oklahoma 73117-1299

Dear Mr. Coleman:

The Environmental Protection Agency (EPA) has reviewed the authorization application of the Oklahoma State Department of Health's (OSDH) non-Hazardous and Solid Waste Amendment (HSA) Cluster V. This application was submitted to EPA via letter dated November 19, 1990, and a followup letter dated November 29, 1990.

EPA used the State Authorization Manual to review OSDH's application. The Attorney General's Statement, Revision Checklists, and Memorandum of Agreement (MOA) were satisfactory. However, since Oklahoma will not be authorized for HSA in this application, reference to HSA in the MOA should be removed in order to reflect the current State program. Attachment A lists deficiencies and errors found in the State's Program Description (PD).

For EPA to proceed with the authorization of this application, OSDH must address the deficiencies and errors noted in Attachment A by one of the following three methods:

1. Addendum to Application - OSDH may use an addendum that identifies the appropriate sections of the existing PD to be deleted, modified, and/or expanded. An addendum should be clearly identified as such in order to facilitate codification in Code of Federal Regulations (CFR) Part 272.
2. Updated Page Inserts - PD inserts may be used to update specific pages of the original application. All new pages should be clearly marked with a revision date and page numbers should correspond to the original text with alpha designations used where necessary (e.g. 11, 11-A, 11-B, etc.). A copy of an original page with partially lined out text can be used if appropriate.
3. New Program Description - The State may wish to revise its existing PD and submit the revision as a replacement for the current one.

6H-HS:HERNANDEZ:ts:x6760:6/18/91:Disc# :Index#

Control 6H-270-91 Due:5/17/91

HERNANDEZ

6H-HS

6/18/91

CUPP

6H-HS

6/20/91

REITER

6H-HS

6/24/91

GERSH

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MOYA

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OKLAHOMA NON-HSWA V

ATTACHMENT A

Comments concerning the Oklahoma Program Description (PD): [The numbers in parenthesis correspond to the State Authorization Manual (SAM) PD review checklist].

GENERAL:

The State's Addendums to the PD refer to appendices by letter designations that do not correspond to the letter designations in the approved base PD. Example - The Addendum to Non-HSWA IV refers to an Organization Chart in Appendix C. The approved base PD shows Appendix D as an Organization Chart.

PART I:

1. (11) The PD did not itemize the costs of establishing and administering the program for at least the first two years after program approval.
2. (13) The PD did not include an itemization of the cost of administrative support.
3. (14) The PD did not include an itemization of the cost of technical support.
4. (15) The PD did not include an itemization of sources and amounts of funding, including Federal grant money, available to the State Director to meet the costs of establishing and administering the program for at least the first two years after program approval.
5. (16) The PD did not identify any restrictions upon the funding specified in number 4 above.
6. (17) The PD did not include a sufficiently detailed description of applicable State joint permitting procedures. The PD should reference the Joint Permitting Agreement.
7. (18) The PD did not include a sufficiently detailed description of applicable State appeals procedures.
8. (19) The PD did not include copies of the standardized forms it intended to employ.
9. (20) The PD did not include one of the following for the manifest form: Either an annotation that the national form is to be used, or a copy of a State form.

OKLAHOMA NON-HSWA V

10. (25) The PD did not contain a complete description of the State's compliance tracking and enforcement procedures, including the timeframes for enforcement actions.

11. (27) The PD did not contain a complete description of the State's compliance tracking and enforcement procedures, including the implementation of policies agreed to in enforcement MOUs and other agreements.

12. (28) The PD did not contain a description of the State manifest tracking system, or of the procedures the State will use to coordinate information with other approved State programs and the Federal program regarding interstate and international shipments.

13. (37) The PD did not address hazardous waste handlers added to the RCRA universe since the original application was submitted.

14. (38) The PD did not contain an estimate of the annual quantities of hazardous wastes generated within the State. The PD should provide the information if it is known.

PART II-VI:

15. (1) The PD did not describe the program for identification and listing of hazardous waste.

16. (2) The PD did not describe the differences for identification and listing of hazardous waste.

17. (3) The PD did not describe the program standards for hazardous waste storage and treatment tank systems.

18. (4) The PD did not describe the difference between the State and Federal standards for hazardous waste storage and treatment tank systems.

19. (5) The PD did not describe the program standards for permit modifications for hazardous waste management facilities.

20. (6) The PD did not describe the difference between the State and Federal standards for permit modifications for hazardous waste management facilities.

21. (7) The PD did not describe the program standards for statistical methods for evaluating ground-water monitoring data from hazardous waste facilities.

OKLAHOMA NON-HSWA V

22. (8) The PD did not describe the difference between the State and Federal standards for statistical methods for evaluating ground-water monitoring data from hazardous waste facilities.

23. (9) The PD did not describe the program standards for generators of hazardous waste.

24. (10) The PD did not describe the difference between the State and Federal standards for generators of hazardous waste.

Joan K. Leavitt, M.D.
Commissioner

OKLAHOMA STATE
DEPARTMENT OF HEALTH

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OKLAHOMA CITY, OK 73117-1299



Rec
4/13/92
Non HSWA
V

AN EQUAL OPPORTUNITY EMPLOYER

August 23, 1991

Ms. Guanita Reiter, Chief (6H-H)
RCRA Programs Branch
U.S.E.P.A., Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Revised Program Description, Non-HSWA Cluster V

Dear Ms. Reiter:

In response to the letter from Dr. Davis to Mark Coleman dated June 25, 1991, the Oklahoma State Department of Health is pleased to submit a revised Program Description Addendum (PDA) for its non-HSWA Cluster V Revision Application. The enclosed revised PDA (including the associated staffing and funding tables) replaces in its entirety the PDA submitted with the original application package in November, 1990. Also enclosed are two new Appendices (F and G) for the application package, and a revised Table of Contents. We trust that the enclosed PDA addresses the concerns raised by EPA in its June 25th letter, and will enable EPA to proceed with authorization of Oklahoma for non-HSWA Cluster V.

If you have any questions, please contact me at (405)271-7052, or Jimmy Givens at (405)271-8141.

Sincerely,


Damon D. Wingfield, Chief
Hazardous Waste Management Service

DDW/JDG/pw

cc: Dick Thomas (6H-HS)
Ann Zimmerman (6H-HS)
Olga Moya (6C-W)

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I. ADDENDUM TO PROGRAM DESCRIPTION

Non-HWA V
No date

I. ADDENDUM TO PROGRAM DESCRIPTION

SCOPE, STRUCTURE, COVERAGE AND PROCESSES

All of the program elements for which authorization is now being sought have been in place as State requirements since at least June 4, 1990. Both the nature of the elements and early experience by the State in implementing them (as State requirements) indicate that the scope, structure and coverage of the State program will not be significantly affected by the non-HSWA Cluster V provisions.

Significant changes in processes are embodied in the non-HSWA Cluster V provisions in the form of EPA's three-tiered permit modification procedures and simplified procedures for certain changes under interim status. The former was specially adopted by reference by the State effective May 11, 1989 (and was mentioned in the August 31, 1989 Revision Application); the latter has been in effect since June 4, 1990. The State believes that these procedures will make more equitable and generally streamline the modification process, which formerly consisted of the "old" EPA "major modification/minor modification" and "reconstruction/no reconstruction" approaches. Thus, while the process changes under Cluster V are substantial, they are not expected to be disruptive of the program or to require additional resources.

While the program elements covered by non-HSWA Cluster V are not themselves expected to have a major impact on the existing State program, recent State legislative action has substantial implications both for the regulation of controlled industrial waste (hazardous waste) and recyclable materials and for management of the State program.

House Bill 1933 contains the following provisions which impact the regulation of controlled industrial waste, either directly or indirectly:

1. The Department of Health is given explicit statutory authority to obtain administrative search warrants;
2. Statutory authority for certain regulatory requirements is clarified or cemented:
 - a. The Board of Health has authority to promulgate regulations regarding fuel containing "used oil";
 - b. The hazardous waste component of radioactive mixed waste will be regulated as hazardous waste;
 - c. Certain forms of "alternate" financial assurance, e.g. financial test and corporate guarantee, are acceptable for liability

coverage and closure/post-closure assurance
(if so provided by regulation);

- d. Short-term storage by the generator may by rule be excluded from permitting requirements;
 - e. Facilities newly regulated due to statutory or regulatory changes may obtain interim status as provided by Rule;
 - f. The Oklahoma Controlled Industrial Waste Disposal Act takes precedence over the Oklahoma Solid Waste Management Act where controlled industrial wastes are concerned;
3. The period after which Administrative Orders become final, if no hearing has been requested, is shortened from thirty days to fifteen days;
4. A major new fee system for controlled industrial waste treatment, storage, disposal and recycling facilities is established, based upon weight or volume of waste treated, stored, disposed or recycled. Fees range up to \$500,000 per year (with automatic annual inflation adjustments). The Health Department is authorized to use the fees for, among other things, increased staff (including full-time inspectors at commercial facilities), public information and technical assistance activities, and waste minimization programs;

5. The Health Department is given exclusive jurisdiction over wastewater discharges from controlled industrial waste facilities to surface waters.

House Bill 1933 contained an emergency clause and was therefore effective upon the Governor's signature on May 10, 1990, except for the new fee provisions, which were effective July 2, 1990. While much of the bill is more or less of a housekeeping nature, the provisions relating to the shortening of the "request for hearing" period on Administrative Orders and to authority for administrative search warrants should significantly increase enforcement capabilities and effectiveness. Additionally, the fee provisions will have a dramatic impact on program resources, as is further discussed below.

The other major item of legislation is House Bill 2050, which was effective July 1, 1990. The major thrust of House Bill 2050 is to treat recyclable materials as controlled industrial waste until they are actually reused or recycled and sold. The other major component of the bill, which in a sense is a corollary, is that new recycling units must now be permitted. Existing recycling units are not required to obtain a permit, but must operate in "an environmentally acceptable manner". The State program is thus more stringent than the Federal program with respect to recyclable materials and recycling facilities.

House Bill 2050 is not expected to result in a sizeable increase in the universe of regulated facilities, but it will dramatically increase the number of State disposal plans, since the shipping of recyclable materials previously did not require a disposal plan. It will also increase compliance monitoring and enforcement activities, which the fees of House Bill 1933 will necessarily help support.

A copy of House Bill 1933 and of House Bill 2050 are attached as Appendices B1 and B2, respectively.

Amended State controlled industrial waste regulations were adopted by the Board of Health on April 12, 1990 and June 21, 1990, effective June 4, 1990 and August 9, 1990, respectively. Appendix A contains a copy of the current Rules and Regulations for Industrial Waste Management.

Other than technical corrections and certain incorporation-by-reference changes related to the UIC program, the only changes made by the April 12th amendments were to "update" the incorporation-by-reference date of State Rule 210 (incorporating by reference 40 CFR Parts 260 through 266, 268, 270, and portions of 124) from July 1, 1988 to July 1, 1989, and to delete as superfluous State Rule 211. That Rule had specially incorporated by reference the Federal rules of September 1, 1988 relating to liability coverage, and of September 28, 1988 relating to permit modification, as well as

certain provisions of 40 CFR Parts 144 and 146 relating to the Underground Injection Control Program. With the "updating" of the general incorporation-by-reference date, the provisions of Rule 211 became superfluous.

The changes made by the June 21st amendments were largely technical corrections to, and clarifications for, regulations which were already in place. Additionally, the amendments substantially rewrote the state permit procedure rules in Chapter Six primarily to (1) revise the criteria under which a permit modification will also require a new state construction permit (changed from a cost basis to a type-of-unit and capacity basis), (2) provide greater local access to permit applications, and (3) clarify state permit procedures.

Finally, the June 21st amendments revised Chapter Seven to simplify the handling of claims of confidentiality. None of these changes is expected to dramatically alter the program; it is anticipated that they will modestly streamline some procedures.¹

The Department interprets the incorporated-by-reference provisions to provide corresponding authority to the Federal

¹It should be noted that on August 28, 1990, the State Board of Health specially adopted by reference the "Toxicity Characteristic (TC) Rule" to replace the "EP Tox" characteristic, so as to maintain consistency with EPA on this fundamental identification matter.

program. Thus, the State program is equivalent to and no less stringent than the Federal program.

As discussed above and in previous applications, the State program is somewhat more stringent or broader in scope than the Federal program; see Appendix A. However, as noted in previous Applications, since the major revisions of the State Rules in 1987 to move to a system of wholesale incorporation by reference of the Federal Rules, the number and extent of differing (broader or more stringent) State Rules are limited, being restricted primarily to additional requirements mandated by State statute (e.g. fees, disposal plans, transporter registration, two-phase permitting).

PROGRAM STANDARDS

Program standards for generators, for storage, treatment and disposal facilities, and for identification and listing of hazardous wastes are extensively described in the 1984 Base Program Description. See Section III(A) (pages 5-14). Program standards regarding permitting are also described in the Base Program Description (pages 14 et. seq and 43 et. seq.). Any changes to those standards are described in the subsequent Program Description Addendums. Because the State program adopts the Federal requirements by reference (including the recent changes relating to standards for identification and listing of hazardous waste, for storage and treatment tank systems, for permit modifications, for

evaluation of groundwater monitoring data, and for generators), the State program standards are equivalent to the Federal standards.

STATE AGENCY RESPONSIBILITIES

The Oklahoma State Department of Health remains the sole State agency responsible for the implementation of RCRA in Oklahoma. Upon approval of this submittal and the submittals of August 30, 1988 and August 31, 1989 (non-HSWA portion), as amended, the State will be authorized to implement all non-HSWA RCRA requirements through non-HSWA Cluster V, i.e., as of July 1, 1989.

Responsibility for enforcement of federal HSWA requirements (except Availability of Information) within the State will remain with EPA at this time. Of course, the lack of authorization of the State program for certain components does not preclude the Department from enforcing provisions of its own program even if they parallel non-authorized RCRA or HSWA requirements.

RESOURCES AND ORGANIZATION

No major adjustment of resources specifically as a result of the non-HSWA Cluster V requirements is anticipated. However, implementation of the fee provisions of House Bill 1933 (discussed above) is expected eventually to have a major impact upon both the funding and staffing of the program. Because actual payment of the

first round of annual fees under the bill is in arrears (i.e., they will not be due until July, 1991), the effects of the additional funding will be largely unrealized until State fiscal year 1992 (which begins July 1, 1991).

In anticipation of the major staffing increases to result from these fees, and the accompanying increased supervisory demands, the former Waste Management Service of the Health Department has been split into the Hazardous Waste Management Service and the Solid Waste Management Service, effective July 1, 1990. Each of these two new Services will have a Chief who will report directly to the Deputy Commissioner for Environmental Health Services. Previously there was a single Chief over all of the waste management programs. The responsibilities and roles of each of the two new "Services" will be similar to those of the predecessor Industrial Waste and Solid Waste Divisions. For example, the primary responsibility of the Hazardous Waste Management Service will be to administer and enforce the RCRA program, as was the case with the Industrial Waste Division. In summary, the reorganization is primarily a management tool, and the regulated community, as well as EPA, should notice little difference as a result.

The Hazardous Waste Management Service continues to be staffed with personnel that have the administrative expertise, technical background and experience necessary to effectively administer and implement the State's hazardous waste management program. Most of

the personnel currently employed in the Service have several years of experience in the hazardous waste program. Both experienced and newer personnel are encouraged to participate in a variety of training programs to further develop their expertise and skills.

The organization of the Hazardous Waste Management Service is depicted in Appendix D; the parenthetical "P" beside many of the vacancies indicates a proposed position based upon additional funding, including that from House Bill 1933 (see above). While the chart is still a draft, it is expected to be reasonably reflective of the eventual organization.

Staffing and funding for the program in general (both current and projected) are examined in the attached Tables I through IX.

STATE PROCEDURES

No significant change in procedures will result from the program revisions for which authorization is being sought. The Operations Permit appeal process is similar to that used by the EPA. The State rules adopt by reference those portions of 40 CFR Part 124 that are required of authorized States, and also adopt by reference the "appeal" section (40 CFR 124.19).

The Oklahoma Administrative Procedures Act was amended in May, 1990, although the effective date for most provisions is July 1,

1991. The changes generally are refinements of procedures already required and described in previous Revision Applications, and will not significantly affect the State program. For informational purposes, a copy of the amendments to the Act is attached as Appendix C.

COMPLIANCE TRACKING AND ENFORCEMENT

The compliance tracking and enforcement procedures are generally described in the "Compliance Tracking and Enforcement" section of the Cluster IV Addendum to Program Description.

An update to the Cluster IV discussion is appropriate. Compliance tracking and enforcement is coordinated by an Enforcement Coordinator (Supervising Environmental Specialist). Tracking is accomplished by both manual and computerized internal systems as well as by the HWDMS/RCRIS systems.

Facilities which are issued Notices of Violations (NOVs) are logged into the HWMS manual Enforcement Compliance Tracking System (ECTC) by their name and by their violator status: High Priority Violator, Medium Priority Violator, or Low Priority Violator (HPV-MPV-LPV). After violator status has been determined, the "discovery date" and the date by which enforcement action must be initiated, per the Enforcement Memorandum of Understanding (MOU), are determined and all dates are logged into the ECTC. HWMS has 135

days for HPVs, and 195 days for MPVs from the date of discovery to take formal enforcement action. Generally, this means an Administrative Compliance Order (ACO) is issued.

Internal manual compliance and enforcement tracking have developed substantially. A daily tracking log of facilities issued NOVs is maintained which details the facilities' violator status, their discovery date and as applicable, their 135th day or 195th day. In addition to the daily log is the OSDH "Level 1" list which tracks the progress of all HPVs and of facilities issued Administrative Compliance Orders, Penalty Orders and Consent Agreement Final Orders.

Compliance tracking and enforcement procedures, agreed to between the OSDH and the EPA, are specifically addressed in the Enforcement MOU. For example, the Enforcement MOU: (1) categorizes violators (HPV-MPV-LPV) and the appropriate enforcement response(s), (2) sets timeframes within which each NOV/ACO will be issued, (3) sets a deadline after which enforcement action may be taken by the EPA and (4) establishes priorities for enforcement actions. The MOU references parts of two EPA policy documents: a) the Enforcement Response Policy (ERP) and b) the RCRA Implementation Plan (RIP).

ESTIMATED REGULATED ACTIVITIES

As noted under "Scope, Structure, Coverage and Processes" above, the regulated universe, at least within Oklahoma, will not be substantially increased by the non-HSWA Cluster V changes. House Bill 2050, discussed above, will increase regulatory activities with respect to recyclers; the number of commercial recyclers in Oklahoma is currently small, however. House Bill 1933 should help support any increase in activities occasioned by House Bill 2050.

The identified hazardous waste handlers in Oklahoma numbered 2092 at the end of 1984. The number of identified hazardous waste handlers in Oklahoma today is 4280. There have been 2188 hazardous waste handlers added since 1984.

STATE FORMS AND COORDINATION WITH OTHER AGENCIES

There is no impact upon State forms or upon interagency coordination by the changes which are the subject of this revision application. The State requires generators to use the National Uniform Manifest (NUM). In addition, generators must fill out a Disposal Plan Application and a Quarterly Report Form; receiving facilities must submit a Monthly Report Form (see Attachment F). All persons having controlled industrial waste transported off-site (both generators and recyclers) must include the approved disposal

plan number in the State Generator's I.D. space. All transporters must fill out a Transporter Invoice and Registration Form (also at attachment F). Applicable State Joint Permitting Procedures are addressed in the Joint Permitting Agreement between the Department and EPA (see Attachment G).

In addition to using uniform hazardous waste manifests and following general hazardous waste manifest practices required by the federal RCRA program, the Department reviews all manifests submitted from the regulated community. Manifests are reviewed to look for errors, omissions, or discrepant information. Oklahoma hazardous waste generators are required to submit to the Department, on a quarterly basis, copies of all manifests which they have used during the preceding quarter. Treatment, Storage, and Disposal facilities (TSDFs) are required to submit copies of manifests on a monthly basis. The information from the manifests relative to generators, receiving facilities, and quantities and types of wastes is entered into a database by the staff of the Data Management Section of the Hazardous Waste Management Service.

The Department coordinates with other approved state programs and the federal program on an "as needed" basis. Information regarding interstate and international shipments, as well as other information which is collected as described above, is shared with other programs upon request. Notifications of planned importation

of hazardous waste are sent to the Region 6 office of EPA each month.

SUMMARY

Because the State program adopts by reference all of the Federal requirements (except delisting and petition provisions in 40 CFR 260.20 through 260.22) in 40 CFR 260 through 266, 268 and 270, as well as the mandated portions of Part 124, as of July 1, 1989, and is capable of providing adequate monitoring, tracking and enforcement of same, it is appropriate that the State administer the non-HSWA requirements of the RCRA program through non-HSWA Cluster V.

TABLE I
OKLAHOMA STATE DEPARTMENT OF HEALTH
HAZARDOUS WASTE MANAGEMENT SERVICE
FY 1991 PERSONNEL RESOURCES

ADMINISTRATIVE STAFF	AVG. MAN-YEARS	SALARY
Environmental Health Service Chief	1.00	43,627
Accountant I	0.15	3,195
Administrative Assistant II	0.20	4,261
Administrative Assistant I	0.35	6,657
Attorney IV	0.30	11,651
Staff Attorney II	0.70	21,073
 TECHNICAL STAFF		
Senior Environmental Engineer	2.00	72,490
Environmental Specialist Supervisor	3.75	111,549
Senior Hydrologist	2.00	57,478
Chemist II	0.65	17,549
Environmental Engineer I	1.00	26,803
Senior Environmental Specialist	2.50	67,006
Environmental Specialist II	1.40	33,449
Environmental Technician	0.30	5,455
 CLERICAL STAFF		
Secretary II	1.00	19,023
Account Clerk III	1.00	18,593
Secretary I	1.00	16,624
Word Processing Operator III	0.20	3,477
Typist Clerk III	1.00	15,208
 GRAND TOTAL	 20.50	 555,168

TABLE II
OKLAHOMA STATE DEPARTMENT OF HEALTH
HAZARDOUS WASTE MANAGEMENT SERVICE
STAFFING REQUIREMENTS FOR FINAL AUTHORIZATION
THROUGH NON-HSWA CLUSTER V
FY 1991

ELEMENT	MAN-YEARS (FY 91)
Program Management	2.26
Facility Management	15.98
Information Management	2.26
TOTAL	20.50

TABLE II-A
OKLAHOMA STATE DEPARTMENT OF HEALTH
SUPPORT PERSONNEL

SUPPORT POSITIONS	AVERAGE MAN-YEARS	SALARY
Deputy Commissioner	0.20	13,315
Env. Health Div. Director II	2.00	74,164
Budget Analyst III	0.25	7,886
Accountant I	2.00	42,606
Administrative Assistant II	1.00	21,303
Chief Env. Attorney	0.50	26,299
Attorney IV	0.80	34,902
Staff Attorney I	0.30	7,859
Legal Intern	0.30	5,216
Env. Health Consultant	3.00	76,779
Health Facilities Consultant	0.45	13,863
TOTAL ADMINISTRATIVE SUPPORT	10.80	324,192
Chief Environmental Engineer	1.00	42,612
Env. Engineer Supervisor	2.00	77,672
Sr. Environmental Engineer	1.00	36,246
r. Hydrologist	1.00	27,438

TABLE II-A (CONTINUED)
OKLAHOMA STATE DEPARTMENT OF HEALTH
SUPPORT PERSONNEL

Environmental Engineer II	2.00	63,084
Chemist II	0.10	2,680
Sr. Environmental Specialist	0.30	8,041
Staff Epidemiologist	1.00	31,542
Hydrologist II	5.00	122,205
Environmental Specialist II	11.00	262,812
Environmental Specialist I	1.00	21,303
Lab Technician	0.25	3,638
Environmental Epidemiologist	0.20	10,552
District Sanitarians (6 x .05)	0.30	11,125
County Sanitarians (125 x .05)	6.25	156,350
 TOTAL TECHNICAL SUPPORT	 32.40	 877,300
 Executive Secretary I	 1.00	 18,594
Secretary II	1.00	18,184
Word Processing Operator III	0.40	6,650
Account Clerk II	1.00	15,545
Typist Clerk III	2.00	30,416
 TOTAL CLERICAL SUPPORT	 5.40	 89,389
 GRAND TOTAL SUPPORT	 48.60	 1,290,881

TABLE III
OKLAHOMA STATE DEPARTMENT OF HEALTH
HAZARDOUS WASTE MANAGEMENT SERVICE
FY 1991 BUDGET SUMMARY*

	FY 91
Salary	555,168
Fringe Benefits	152,179
Travel	16,040
Equipment	0
Supplies	45,803
Contractual	8,960
Data Processing	0
Subtotal	778,150
Indirect Costs (18% of salaries totaling \$555,168.00)	99,930
Total	878,080
Federal Share	658,560
State Share**	219,520

* Amounts shown reflect dollars for hazardous waste management program through non-HSWA cluster V.

**The State share is composed of Controlled Industrial Waste funds which are assessed and collected by the Oklahoma State Department of Health. The Controlled Industrial Waste Fund may be expended for the following:

1. the administration of the provisions of the Oklahoma Controlled Industrial Waste Disposal Act.
2. the development of an inventory of controlled industrial wastes currently produced in Oklahoma and management needs for the identified wastes.
3. the implementation of information exchanges, technical assistance, public information, and educational programs.
4. the development and encouragement of waste reduction plans for Oklahoma waste generators.
5. increased inspection of controlled industrial waste facilities which may include full time inspectors at off-site controlled industrial waste facilities.

TABLE IV
OKLAHOMA STATE DEPARTMENT OF HEALTH
HAZARDOUS WASTE MANAGEMENT SERVICE
FY 1992 PERSONNEL RESOURCES

ADMINISTRATIVE STAFF	AVG. MAN-YEARS	SALARY
Environmental Health Service Chief	1.00	46,681
Accountant I	0.15	3,420
Administrative Assistant II	0.20	4,559
Administrative Assistant I	0.35	7,123
Attorney IV	0.30	12,467
Staff Attorney II	0.70	22,548
TECHNICAL STAFF		
Senior Environmental Engineer	2.00	77,564
Environmental Specialist Supervisor	3.75	119,357
Senior Hydrologist	2.00	61,501
Chemist II	0.65	18,777
Environmental Engineer I	1.00	28,679
Senior Environmental Specialist	2.50	71,696
Environmental Specialist II	1.40	35,790
Environmental Technician	0.30	5,837
CLERICAL STAFF		
Secretary II	1.00	20,355
Account Clerk III	1.00	19,895
Secretary I	1.00	17,788
Word Processing Operator III	0.20	3,720
Typist Clerk III	1.00	16,273
GRAND TOTAL	20.50	594,030

TABLE V
OKLAHOMA STATE DEPARTMENT OF HEALTH
HAZARDOUS WASTE MANAGEMENT SERVICE
STAFFING REQUIREMENTS FOR FINAL AUTHORIZATION
THROUGH NON-HSWA CLUSTER V
FY 1992

ELEMENT	MAN-YEARS (FY 91)
Program Management	2.26
Facility Management	15.98
Information Management	2.26
TOTAL	20.50

TABLE V-A
OKLAHOMA STATE DEPARTMENT OF HEALTH
SUPPORT PERSONNEL

SUPPORT POSITIONS	AVERAGE MAN-YEARS	SALARY
Deputy Commissioner	0.20	13,315
Env. Health Div. Director II	2.00	75,008
Budget Analyst III	0.25	7,992
Accountant II	0.50	12,156
Accountant I	0.85	10,465
Administrative Assistant II	0.95	20,638
Administrative Assistant I	0.65	12,093
Chief Env. Attorney	0.30	15,904
Attorney IV	0.65	27,074
Staff Attorney I	0.40	13,436
Legal Intern	0.30	5,344
Env. Health Consultant	3.00	78,036
Health Facilities Consultant	0.50	14,052
TOTAL ADMINISTRATIVE SUPPORT	10.55	305,513
Chief Environmental Engineer	1.00	45,064
Env. Engineer Supervisor	1.00	39,256
r. Environmental Engineer	2.00	73,332
Hydrologist Supervisor	1.00	32,696

TABLE V-A (CONTINUED)
OKLAHOMA STATE DEPARTMENT OF HEALTH
SUPPORT PERSONNEL

Env. Specialist Supervisor	0.55	16,405
Sr. Hydrologist	4.00	111,432
Chemist II	0.90	24,501
Environmental Engineer I	2.00	54,448
Sr. Environmental Specialist	7.10	193,290
Epidemiologist	1.00	26,012
Hydrologist II	2.00	49,722
Environmental Specialist II	6.70	162,890
Sr. Lab Technician	0.15	2,852
Environmental Epidemiologist	0.20	9,037
District Sanitarians (6 x .05)	0.30	11,251
County Sanitarians (125 x .05)	6.25	158,975
TOTAL TECHNICAL SUPPORT	36.15	1,011,163
Executive Secretary I	1.00	19,014
Secretary II	2.20	40,929
Account Clerk III	0.50	9,098
Word Processing Operator II	0.80	12,010
TOTAL CLERICAL SUPPORT	4.50	81,051
GRAND TOTAL SUPPORT	51.20	1,397,727

TABLE VI
OKLAHOMA STATE DEPARTMENT OF HEALTH
HAZARDOUS WASTE MANAGEMENT SERVICE
FY 1992 BUDGET SUMMARY*

	FY 92
Salary	594,030
Fringe Benefits	162,832
Travel	17,163
Equipment	0
Supplies	49,009
Contractual	9,587
Data Processing	0
Subtotal	832,621
Indirect Costs (18% of salaries totaling \$594,030.00)	106,925
Total	939,546
Federal Share	704,660
State Share**	234,886

* Amounts shown reflect dollars for hazardous waste management program through non-HSWA cluster V.

**The State share is composed of Controlled Industrial Waste funds which are assessed and collected by the Oklahoma State Department of Health. The Controlled Industrial Waste Fund may be expended for the following:

1. the administration of the provisions of the Oklahoma Controlled Industrial Waste Disposal Act.
2. the development of an inventory of controlled industrial wastes currently produced in Oklahoma and management needs for the identified wastes.
3. the implementation of information exchanges, technical assistance, public information, and educational programs.
4. the development and encouragement of waste reduction plans for Oklahoma waste generators.
5. increased inspection of controlled industrial waste facilities which may include full time inspectors at off-site controlled industrial waste facilities.

TABLE VII
OKLAHOMA STATE DEPARTMENT OF HEALTH
HAZARDOUS WASTE MANAGEMENT SERVICE
FY 1993 PERSONNEL RESOURCES

ADMINISTRATIVE STAFF	AVG. MAN-YEARS	SALARY
Environmental Health Service Chief	1.00	49,949
Accountant I	0.15	3,658
Administrative Assistant II	0.20	4,878
Administrative Assistant I	0.35	7,622
Attorney IV	0.30	13,340
Staff Attorney II	0.70	24,126
TECHNICAL STAFF		
Senior Environmental Engineer	2.00	82,993
Environmental Specialist Supervisor	3.75	127,713
Senior Hydrologist	2.00	65,806
Chemist II	0.65	20,091
Environmental Engineer I	1.00	30,687
Senior Environmental Specialist	2.50	76,715
Environmental Specialist II	1.40	38,295
Environmental Technician	0.30	6,246
CLERICAL STAFF		
Secretary II	1.00	21,780
Account Clerk III	1.00	21,288
Secretary I	1.00	19,033
Word Processing Operator III	0.20	3,980
Typist Clerk III	1.00	17,412
GRAND TOTAL	20.50	635,612

TABLE VIII
OKLAHOMA STATE DEPARTMENT OF HEALTH
HAZARDOUS WASTE MANAGEMENT SERVICE
STAFFING REQUIREMENTS FOR FINAL AUTHORIZATION
THROUGH NON-HSWA CLUSTER V
FY 1993

ELEMENT	MAN-YEARS (FY 91)
Program Management	2.26
Facility Management	15.98
Information Management	2.26
TOTAL	20.50

TABLE VIII-A
OKLAHOMA STATE DEPARTMENT OF HEALTH
SUPPORT PERSONNEL

SUPPORT POSITIONS	AVERAGE MAN-YEARS	SALARY
Deputy Commissioner	0.20	14,247
Env. Health Div. Director II	2.00	80,259
Budget Analyst III	0.25	8,551
Accountant II	0.50	13,007
Accountant I	0.85	11,198
Administrative Assistant II	0.95	22,083
Administrative Assistant I	0.65	12,940
Chief Env. Attorney	0.30	17,017
Attorney IV	0.65	28,969
Staff Attorney I	0.40	14,377
Legal Intern	0.30	5,718
Env. Health Consultant	3.00	83,499
Health Facilities Consultant	0.50	15,036
TOTAL ADMINISTRATIVE SUPPORT	10.55	326,901
Chief Environmental Engineer	1.00	48,218
Env. Engineer Supervisor	1.00	42,004
r. Environmental Engineer	2.00	78,465
Hydrologist Supervisor	1.00	34,985

TABLE VIII-A (CONTINUED)
OKLAHOMA STATE DEPARTMENT OF HEALTH
SUPPORT PERSONNEL

Env. Specialist Supervisor	0.55	17,553
Sr. Hydrologist	4.00	119,232
Chemist II	0.90	26,216
Environmental Engineer I	2.00	58,259
Sr. Environmental Specialist	7.10	206,820
Epidemiologist	1.00	27,833
Hydrologist II	2.00	53,203
Environmental Specialist II	6.70	174,292
Sr. Lab Technician	0.15	3,052
Environmental Epidemiologist	0.20	9,670
District Sanitarians (6 x .05)	0.30	12,039
County Sanitarians (125 x .05)	6.25	170,103
TOTAL TECHNICAL SUPPORT	36.15	1,081,944
 Executive Secretary I	 1.00	 20,345
Secretary II	2.20	43,794
Account Clerk III	0.50	9,735
Word Processing Operator II	0.80	12,851
 TOTAL CLERICAL SUPPORT	 4.50	 86,725
 GRAND TOTAL SUPPORT	 51.20	 1,495,570

TABLE IX
OKLAHOMA STATE DEPARTMENT OF HEALTH
HAZARDOUS WASTE MANAGEMENT SERVICE
FY 1993 BUDGET SUMMARY*

	FY 92
Salary	635,612
Fringe Benefits	174,230
Travel	18,364
Equipment	0
Supplies	52,440
Contractual	10,258
Data Processing	0
Subtotal	890,904
Indirect Costs (18% of salaries totaling \$594,030.00)	<u>114,410</u>
Total	1,005,314
Federal Share	753,986
State Share**	251,328

* Amounts shown reflect dollars for hazardous waste management program through non-HSWA cluster V.

**The State share is composed of Controlled Industrial Waste funds which are assessed and collected by the Oklahoma State Department of Health. The Controlled Industrial Waste Fund may be expended for the following:

1. the administration of the provisions of the Oklahoma Controlled Industrial Waste Disposal Act.
2. the development of an inventory of controlled industrial wastes currently produced in Oklahoma and management needs for the identified wastes.
3. the implementation of information exchanges, technical assistance, public information, and educational programs.
4. the development and encouragement of waste reduction plans for Oklahoma waste generators.
5. increased inspection of controlled industrial waste facilities which may include full time inspectors at off-site controlled industrial waste facilities.

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Non-HW

V

APPENDIX D

HAZARDOUS WASTE MANAGEMENT SERVICE ORGANIZATION CHART

HAZARDOUS WASTE	GEMENT SERVICE
Env. Health Ser. Damon Wingfield	Chief
Administrative Assistant II (P) Vacant	
Executive Secretary I (P) Vacant	

HAZARDOUS WASTE	GEMENT SERVICE
Env. Health Ser. Damon Wingfield	Chief
Administrative Assistant II (P) Vacant	
Executive Secretary I (P) Vacant	

PLANNING & DATA MANAGEMENT DIVISION	ENFORCEMENT DIVISION
Env. Health Division Director II Vacant	Env. Health Division Director II (P) Vacant

FACILITIES DIVISION	ENFORCEMENT DIVISION
Chief Env. Engineer Vacant	Env. Health Division Director II (P) Vacant

PLANNING SECTION	DATA MANAGEMENT PROGRAM	LAND DISPOSAL FACILITIES SECTION	TREATMENT/STORAGE FACILITIES SECTION	ENFORCEMENT SECTION	LEGAL SECTION
Env. Spec. Supervisor Catherine Sharp	Env. Spec. Supervisor Al Coulter	Env. Eng. Supervisor (P) Vacant	Env. Eng. Supervisor (P) Vacant	Env. Spec. Supervisor David Stutt	Attorney IV Jimmy Givens
Sr. Hydrologist (P) Vacant (Hyd II)	Env. Specialist II Sherri Altman	Sr. Env. Engineer Donald Barrett	Sr. Hydrologist Askari Zaidi	Sr. Env. Engineer Karen Dhrberg (Sr. Hyd)	Staff Attorney II Cheryl Blake
Sr. Hydrologist (P) Vacant (Hyd II)	Sr. Env. Specialist Jack Badgett	Sr. Env. Engineer Vacant	Env. Engineer I Ken Stover	Sr. Env. Specialist Chris Varga	Health Facilities Cons. Richard Mullins
Sr. Hydrologist (P) Vacant (Hyd II)	Sr. Env. Specialist (P) Vacant (ES II)	Sr. Hydrologist (P) Tom Kennan (EH Cons.)	Sr. Env. Engineer (P) Vacant (EE II)		
Sr. Env. Specialist (P) Vacant (ES II)	Sr. Env. Specialist (P) Vacant (ES II)	Sr. Hydrologist (P) Vacant (Hyd II)	Sr. Env. Specialist Gail Hamill (ES I)	Sr. Env. Specialist (P) Vacant (ES II)	E. H. Consultant Vacant
Sr. Env. Specialist (P) Vacant (ES II)	Accountant I (P) Vacant (Acct. I)	Hydrologist II Vacant	Sr. Env. Specialist (P) Vacant (ES II)		
Sr. Env. Engineer (P) Vacant (EE II)	Word Proc. Oper. III (-4)(P) Vacant	Sr. Env. Specialist J. Brendan Murphy	Sr. Env. Specialist (P) Vacant (ES II)	Secretary II Cecelia Hennigh	
Staff Epidemiologist (P) Vacant	Typist Clerk III Ruth Malone (TC II)	Sr. Env. Specialist John Ice (EH Cons.)	Sr. Env. Specialist (P) Vacant (ES II)	Account Clerk III Mignon Callaway	E. H. Consultant Vacant
Accountant I (P) Vacant (Acct. I)		Secretary II Betty Swanson	Account Clerk III (P) Vacant (AC II)		
Secretary II (P) Vacant (TC III)		Secretary I (P) Vacant (TC III)	Secretary I Eileen Hroch		

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