request an extension for other reasons. The proposed guidelines specify minimum requirements to be included in State plans with such provisions. If an extension is granted, compliance must be required within 3 years after EPA approval of the State plan.

Regardless of the status of the State plans, all designated facilities must be in compliance within 5 years after promulgation of the emission guidelines. The proposed emission guidelines require the EPA to develop, implement, and enforce a plan for any State that has not submitted an approvable plan within 2 years after promulgation of the emission guidelines.

The proposed emission guidelines also require that, for approval, a State plan provide that each designated facility must be in compliance with the operator training and qualification requirements and the inspection requirements within 1 year after EPA approval of the State plan. No extension is available for training, qualification, or inspection.

## L. Permit Requirements

The proposed standards and guidelines include a requirement that facilities operate pursuant to permits issued under the EPA-approved State operating permit program. Permits would be required beginning 36 months after the date of promulgation of the standards and guidelines, or on the effective date of an EPA-approved operating permit program in the State in which the facility is located, whichever date is later. The operating permit programs are developed under Title V of the Act and the implementing regulations under 40 CFR part 70.

III. Impacts of the Proposed Standards for New MWI's

This section presents a description of the air. water. solid waste. energy. control cost, and economic impacts of today's proposed standards for new MWI's. All of the impacts presented are nationwide impacts that are expected to result from the implementation of the NSPS in the fifth year after adoption. As discussed below, it is expected that as many as 80 percent of the projected number of new MWI's will not be constructed to avoid the increased costs associated with installation of control equipment. Therefore, impacts are presented assuming 80 percent of projected new MWI's are not constructed, with the waste being disposed of by other means (i.e., the 'switching scenario'').

Based on historic sales to date, in the absence of regulation, an estimated 700

new MWI's are expected to be installed over the next 5 years. However, onsite incineration is only one of several medical waste treatment and disposal options. For some MWI's, the equipment necessary to comply with the proposed regulations will make onsite incineration more expensive than other waste treatment and disposal options. Consequently, many facilities that would have chosen onsite incineration are likely to consider less expensive methods of treatment and disposal. The EPA expects that as many as 80 percent of the projected number of new MWI's will not be constructed if the standards are promulgated as proposed. This is referred to in this notice as the "switching scenario" because of the expectation that potential owners of MWI's will switch to another method of waste treatment and disposal.

Recent experience at the State level confirms that switching to lower cost alternatives is a likely impact of the implementation of MWI regulations that require add-on air pollution control. For example, recent regulations adopted by the State of New York require the use of add-on acid gas scrubber systems. As a result, the State estimates that as many as 90 percent of previously existing MWI's in New York have ceased operation. New York's regulations are similar to the proposed EPA standards in that they require the use of add-on air pollution control systems or use of an alternative waste disposal approach. While these State regulations have increased the cost of waste disposal, it appears that the availability of alternatives to onsite incineration has mitigated the economic impacts that might have been associated with the State regulations.

One concern that has recently been raised related to switching away from onsite incineration is the availability of alternatives to onsite incineration. Two common alternatives are offsite contract disposal (most commonly commercial medical waste incineration) and onsite autoclaving (steam treatment). Other less common alternatives include onsite chemical treatment and onsite microwave irradiation. The commercial medical waste disposal industry believes that there presently exists sufficient offsite capacity to treat the waste that would no longer be treated onsite. In addition, autoclaves and other onsite waste disposal options are available. In fact, even today in the absence of Federal regulations, most facilities that generate medical waste do not operate onsite MWI's. This indicates that there currently are viable alternatives to onsite incineration.

A second concern regrading a shift away from onsite incineration is the increased transportation and handling of untreated medical waste. However, the Department of Transportation (DOT) has promulgated regulations (49 CFR parts 171, 172, and 173) that address the safe transportation and handling of medical waste. The DOT regulations include provisions for packaging and labeling of medical waste. Also, the Occupational Safety and Health Administration (OSHA) promulgated regulations on December 5, 1991 (29 CFR part 1910) that address occupational exposure to bloodborne pathogens. Using a combination of engineering and work practice controls, personal protective clothing and equipment, training, medical follow-up of exposure incidents, vaccinations (where appropriate) and other provisions, the OSHA regulations minimize or eliminate health risk as a result of occupational exposure to bloodborne pathogens. The Agency believes these DOT and OSHA regulations will provide sufficient protection from potential increases in exposure to these wastes.

## A. Air Impacts

As discussed earlier, impacts are presented assuming the more likely "switching scenario." Baseline emissions and emissions under the proposed NSPS based on the switching scenario are presented in Tables 7a and 7b.

## TABLE 7a.—BASELINE EMISSIONS COMPARED WITH EMISSIONS AFTER NSPS (WITH SWITCHING) [Metric Units]

Pollutant	Units	Baseline	After NSPS with switch- ing
PM	Ma/vr	1 670	81 7
I IVI	wig/yr	1,070	01.7
CO	Mg/yr	1,630	61.7
CDD/CDF	kg/yr	21.7	0.032
HCI	Mg/yr	10,000	230
SO <sub>2</sub>	Mg/yr	192	144
NO <sub>X</sub>	Mg/yr	1,240	944
Pb	Mg/yr	19.2	0.29
Cd	Mg/yr	1.38	0.042
Hg	Mg/yr	14.5	1.10
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