12

R00330124
RCRA RECORDS CENTER

To: Joe Sanfilippo / Region I
From: Jim Humeston
RE: Norplex
Date: 3/3/82

EPA is considering initiating the permitting process for Norplex. The facility has come to the top of their priority scale because of all the ignitable waste generated. As a result of EPA's interest in Norplex I reviewed your past inspections a little closer and have a few suggestions you might consider:

1) The facility's Part A indicates that have a tank storage area. You have not mentioned it in the inspection reports. Next time you inspect this facility you should determine if they are conducting a tank storage activity. Inspector recommend that the process code (S02) be removed from their Part A which ever is applicable.

2) The inspection report for the container storage area (Item D) indicates that the special requirements for ignitable wastes are not required. Most of the waste streams generated by this facility are listed due to their ignitable characteristics. It's my opinion the facility should comply w/ 265.176. If you think otherwise let me know and we'll discuss it

3) I would suggest you review w/company officials the waste streams they have listed on their Part A. A number of the wastes are listed under 261.33 (discarded commercial chemical products & off-spec products). It may be more appropriate to have the wastes listed under 261.31 (nonspecific sources). This might allow a number of the waste streams to be lumped together into one of the spent solvent listing of 261.31.

P/S. let me know if you have any questions