Let me sit in on any [illegible] show conversation you have with Perfection.

Lox 4-5
Per 6-21

Cheryle -

Here are my comments on the 2/22/82 letter from Perfection Mfg:

(1) Paint Sludge - At the time of the inspection this material was being treated as a hazardous waste. Inspector was told that this waste was hazardous based on analysis taken on 3/4/81. Copy of this analysis was included in the inspection report. Analysis attached to 2/22/82 letter was taken on 2/12/82. They have to treat this material as hazardous until proven otherwise, which they only have done recently.

Off Paint

- There is nothing in the Complaint about this waste not being shipped off-site within 90 days.

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2) Waste Xylene + Caustic Waste - Have them send us a copy of the manifest used to ship this waste off-site.

- They mention in the letter that they are expecting final test results for the caustic sludge. I believe we have analysis for this sludge that they took on 4/23/81 indicating that this waste was EP Toxic. Why are they testing it again?

Check this

3) Their statement that since the paint sludge is not hazardous they are a small quantity generator and thus the "Complaint and letter do not apply" doesn't make any sense.

At the time of the inspection they were generating what they thought was a

hazardous waste in quantities > 2200 lb/mo. Had stored waste xylene + waste caustic > 90 days w/o a permit.

Even if they were a small quantity generator (exclude the paint sludge), a small quantity generator cannot store > 2200 lb of hazardous waste greater than 90 days w/o a permit. On 8/13/81 they had 4-55 gallon drums of waste xylene and 4-55 gallon drums of waste caustic (8-55 gallon drums ~~we~~ weigh more than 2200 lbs) being stored at the site since at least 4/23/81 (> 90 days) w/o a permit. This guy Ward Buck is full of shit!