ILN NORPLEX, INC.
INDUSTRIAL LAMINATES/NORPLEX, INC.
Website http://www.norplex.com

POST OFFICE BOX 977
POSTVILLE, IOWA 52162

PHONE (319) 864-7321
FAX (800) 350-9491
E-MAIL: INFO@NORPLEX.COM

22 May, 2003

received
MAY 28 2003

John W. Bosky
U.S. EPA, Region 7
Environmental Services Division
901 North 5th Street
Kansas City, KS 66101

Mr. Bosky:

This is a written response to the multi-media inspection conducted at our facility by Dean I. Williams of Tetra Tech EMI at your bequest on May 8, 2003. In it I will respond to each item from the Notice of Preliminary Findings.

1. 40 CFR 265.53(b) – Revised contingency plan hasn't been submitted to emergency response agencies. **I am currently in the process of updating our emergency response manual and will be including a list of those emergency response teams who should receive a copy of the manual when updates are required per 265.54.**
2. 40 CFR 265.52 (d) Contingency plan doesn't list addresses for emergency coordinators. Contingency plan only includes phone numbers for one emergency coordinator. **We always have an emergency response coordinator/s in the plant while the plant is in operation. Our watchmen have a list of who to call during any emergency. Names, phone numbers, and addresses of all emergency response coordinators will be added to the revised manual.**
3. 40 CFR 265.52 (c) Contingency plan doesn't include a list and description of emergency equipment. **Our Maintenance department maintains this list, and periodically inspects the equipment to make sure it is all there and in good working order. This list will also will be added to the updated procedure.**
4. 40 CFR 265.16 (d)(i) Facility could not produce documentation of RCRA training given to employees in 2001-2002. **We included our RCRA training in conjunction with other training during 2001 and 2002. In addition stand-up meetings were conducted with each of the departments as appropriate to their roll regarding our hazardous waste. Training was also conducted via emails to department group leaders after weekly**

R00416863
RCRA RECORDS CENTER

ILN NORPLEX, INC.
INDUSTRIAL LAMINATES/NORPLEX, INC.
Website http://www.norplex.com

POST OFFICE BOX 977
POSTVILLE, IOWA 52162

PHONE (319) 864-7321
FAX (800) 350-9491
E-MAIL: INFO@NORPLEX.COM

inspections. Starting this year in addition to the above, we will document that an annual review of our RCRA procedures has been conducted.

5. 40CFR265.16(d) (1) Facility could not provide documentation showing job title and name of employee following that position for primary emergency coordinators. **We have descriptions with names for all people who handle hazardous waste, or who would respond to a spill of hazardous waste. The thought was that the primary emergency response coordinator for a hazardous waste spill would be the Treater Group Leader. There is documentation in our procedure showing job description and name of employee for this posisition. This will be clarified in the up-dated procedure.**
6. 40 CFR 265.16 (d) (3) Facility does not have a written description of introductory and continuing training for emergency coordinators. **We have this information documented for the people who would be responding to emergency situations with our hazardous waste. The role of the emergency response coordinator and their training needs will be clarified in the update of the emergency response procedure.**
7. 40 CFR 273.13(d) (1) Containers for storage of waste lamps were not closed. **This has been taken care of.**
8. 40 CFR 273. 14 (e) Containers used for storage of waste lamps were not marked as "used lamps", "waste lamps", or "universal waste lamps". **This has been taken care of.**

If you have any questions please feel free to contact me at (563) 864-4227.

Scott Loven
HS & EQ Manager