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VIA FEDEX OVERNIGHT #7715 3618 1782

February 21, 2018

Steven J. Viggiani
Senior Enforcement Counsel
U.S. Environmental Protection Agency
5 Post Office Sq. Suite 100 (OES04-3)
Boston, MA 02109-3912

RE: Request for Clarification – Title V Permit
Safety-Kleen, Cranston

Dear Mr. Viggiani:

As you may be aware on January 25, 2018, EPA issued a guidance memorandum withdrawing the "Once In Always In" policy for applying to major sources standards of hazardous air pollutants under section 112 of the Clean Air Act (see attached). Under the new guidance, sources of hazardous air pollutants previously classified as "major sources" may be reclassified as "area sources" at any time, provided the facility limits its potential to emit below major source thresholds.

The Safety-Kleen Cranston facility currently has a Title V application under review by the Rhode Island Department of Environmental Management (RIDEM) that was submitted under the directive of the previous "Once In Always In" policy. Since the facility has long since closed and removed the units from the permit and premises that caused the higher emission levels, Safety-Kleen would like to obtain a permit appropriate to the facility's actual emissions.

Safety-Kleen inquired about the "policy change" with RIDEM personnel who stated that they would defer to EPA in this matter. They further stated that they would require correspondence from EPA in order to process a permit other than the Title V application currently under review.

In consideration of the above, Safety-Kleen requests directive from you or someone within your department acknowledging the vacated policy and asks that correspondence be sent to RIDEM in that regard.

Thank you for your consideration in this matter. If you have any questions, please do not hesitate to contact me at (PBI / Ex. 4 or e-mail me at (PBI / Ex. 4

Sincerely,

PBI / Ex. 4

James G. Childress
VP Environmental Compliance, East
Clean Harbors Environmental Services
2815 Old Greenbrier Pike
Greenbrier, TN 37073

Enclosure