To: Lee, Jae[lee.jae@epa.gov]
Cc: Setnicar, Mary[Setnicar.Mary@epa.gov]; Valentino, Michael[Valentino.Michael@epa.gov]; Cunningham, Michael[cunningham.michael@epa.gov]; John Naddy[jnaddy@idem.in.gov]
From: JEAN, RUTH
Sent: Wed 12/14/2016 12:27:26 PM
Subject: RE: Tradebe Information Request Letter
Tradebe_REVISED - FINAL_3007 Requests_12013-16.docx

Jae,

I discussed your request with John Naddy in our compliance section. As I have indicated to you before, our compliance section makes recycling process exclusion determinations. As you know, IDEM's position on Tradebe's SDS unit has previously been questioned by the Environmental Technology Council (ETC) in 2006, and twice responded to by Dave Berrey (since retired from our compliance section). Each response was signed by IDEM's commissioner. IDEM's March 31, 2006 response to ETC indicated that EPA R5 staff had also evaluated the SDS.

According to John, our position continues to be that Tradebe's SDS unit meets the recycling process exclusion at 40 CFR 261.6(c)(1). As such, I agree with John that this matter is between EPA and Tradebe, and we will not be providing comments. However, we did note that your request for information references Tradebe submittals to IDEM. We have not seen these documents, and believe they may have been provided to IDEM's NW regional office inspector. I assume they were provided to EPA as well since you are commenting on these Tradebe submittals. As such, we request you indicate that these documents were provided to EPA.

If you have any specific questions, I recommend you contact John Naddy directly. John has the technical expertise to address your questions regarding the recycling process exclusion.

Thanks,

Ruth

Ruth A. Jean
Senior Environmental Manager
IN Dept. of Environmental Management
Office of Land Quality
Hazardous Waste Permit Section
rjean@idem.in.gov
317.232.3398 direct
www.IN.gov/IDEM

From: Lee, Jae [mailto:lee.jae@epa.gov]
Sent: Tuesday, December 13, 2016 11:04 AM
To: JEAN, RUTH
Cc: Setnicar, Mary; Valentino, Michael; Cunningham, Michael
Subject: RE: Tradebe Information Request Letter

Thank you Ruth for the response.

The question list is attached. Please let me know if you have any comments by 12/15.

Thank you