To: Galbraith, Michael[Galbraith.Michael@epa.gov]
From: Lee, Jae
Sent: Tue 1/24/2017 6:20:49 PM
Subject: FW: Tradebe Information Request Letter

Our consultation with IDEM for Tradebe issue.

See the email below.

Jae

From: Lee, Jae
Sent: Tuesday, December 13, 2016 10:04 AM
To: JEAN, RUTH <RJEAN@idem.IN.gov>
Cc: Setnicar, Mary <setnicar.mary@epa.gov>; Valentino, Michael <valentino.michael@epa.gov>; Cunningham, Michael <cunningham.michael@epa.gov>
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

From: JEAN, RUTH [mailto:RJEAN@idem.IN.gov]
Sent: Tuesday, December 13, 2016 5:53 AM
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>
Subject: RE: Tradebe Information Request Letter

Jae,

This particular issue has historically been handled by our compliance section, by issuing the original determination that the unit is exempt from permitting, and subsequent correspondence with the Environmental Technology Council.

My recommendation is that you proceed with the second option. Please forward me the questions you intend to ask Tradebe, and I will seek input from our compliance section.

Thanks,

Ruth

From: Lee, Jae [mailto:lee.jae@epa.gov]
Sent: Monday, December 12, 2016 1:55 PM
To: JEAN, RUTH
Cc: Setnicar, Mary; Valentino, Michael; Cunningham, Michael
Subject: Tradebe Information Request Letter

Ruth:

As you may know, we are in the process of consulting to the EPA-HQ for the exemption status of the Solids Distillation System (SDS) operated at Tradebe Environmental Services (Tradebe), East Chicago, Indiana.

We have reviewed the Tradebe Treatment and Recycling, LLC Business and SDS System Information, submitted by Tradebe, dated October 11, 2016, Confidential Business Information (CBI) and non-CBI information.

Based on the review of the October 11, 2016 information, we compiled more questions to request additional data and information to Tradebe.

It is a general opinion that this would be a permitting issue since the question is whether the SDS should be permitted or not. Since the authority in the permitting has been delegated to the State, we would like to discuss with IDEM how the information request can be sent to the Tradebe.

It seems there are two options to be considered:

- IDEM can send out these questions to Tradebe. The questions can be modified per IDEM's review and sent to Tradebe "informally" or formally as a part of Part B review process to Tradebe. IDEM would have Tradebe send its responses to IDEM with a copy to EPA subject to any CBI claims.
- EPA can send these out as an "informal" request to Tradebe. Before we do, EPA can share the questions beforehand with IDEM to receive any comments if any. We would ask Tradebe to send its responses to both EPA and IDEM (subject to any CBI claims).

We would like to send this information request to Tradebe as early as we can.

Please let me know your thoughts on this matter.

Jae