



**Franklin
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ENVIRONMENTAL SERVICE PROFESSIONALS

October 26, 1995

Mr. Frank Ciavattieri
Waste Management Division
USEPA, Region 1
JFK Federal Building, Room 2203
Boston, MA 02203

Dear Mr. Ciavattieri:

I am requesting Region I's interpretation of LDR notification requirements when shipping to transfer facilities. Franklin Environmental Services, Inc. is an environmental contractor and transportation company in Massachusetts that frequently is requested by our customers/generators to offer them assistance in regulatory questions such as this item.

Several of the LDR regulations, such as treatment standards and additional required language are contingent on whether a certain waste is managed in a non-CWA/non-CWA equivalent/non-Class I SDWA system only. A common situation arises when we transport waste to a TSDF that is not a CWA/CWA equivalent/Class I facility itself but ships the waste to a TSDF that is. Since the ultimate disposal will occur at a CWA/CWA equivalent/Class I SDWA facility, is the generator in the first shipment (to a non CWA/CWA equivalent/Class I facility) required to submit LDR notifications that comply with the non CWA or CWA requirements?

I would request that you reply to this letter in a written correspondence; please cite any references to the regulations or OSWER Directives that have any bearing on this situation.

Thank you in advance for your cooperation and timely reply to this request.

Sincerely,

Daniel Gillingham
Regulatory Compliance Manager