



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

April 11, 2000

Ross Atkinson, Accounts Manager  
Poly-Pacific International, Incorporated  
8918-18 Street  
Edmonton, AB, Canada T6P 1K6

Dear Mr Atkinson:

Thank you for your brochure and accompanying letter that describes your Multicut® Plastic Media Blasting Recycling Program. In your letter you have requested confirmation from me that the RCRA exemption pursuant to 40 C.F.R. § 261.2(e)(1)(i) is applicable to your process. As I discussed during our prior conversation, you should direct your inquiry to the U.S. EPA's Office of Solid Waste in Washington, D.C. for a formal response. I have already stated to you that the spent blasting media would require a hazard determination and, if found to exceed any characteristic levels of toxic constituents, would subject the spent material to the full scope of the hazardous waste regulations at the facility generating this waste. I also made you aware of a situation in the State of Connecticut where a business conducted that same type of operation and is now a candidate for the Superfund Program due to the widespread contamination caused by the contaminants that were contained in the plastic blasting media.

The issue as to whether this material is a legitimate feedstock for recycling purposes is one which EPA Headquarters should address. Your inability to explain whether toxic materials would normally be used in the production of plastic lumber in the absence of hazardous wastes that are currently received as feedstocks by your facility is probably an issue that the Office of Solid Waste should consider in its legitimacy determination of your recycling process.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth B. Rota".

Kenneth B. Rota, Chief  
RCRA Compliance Unit  
EPA-New England Office

cc: Kevin McSweeney, OEP  
Gary Gosbee, OEP

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