



August 6, 1999

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David A. Ullrich R-19J
Acting Regional Administrator
US EPA - Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Mr. Ullrich:

Please accept this letter as an addendum to our October 21, 1998 XL Project proposal.

USFRS is interested in proceeding with our XL Project using the 2-phased approach that US EPA has offered. We agree that a study-phase, where baseline data, SEP, and regulatory flexibility are defined, will assist in the development of the most appropriate legal mechanism for full project implementation. This should lead to a more clearly defined project, with the most appropriate safeguards protecting all stakeholder interests.

I believe the questions brought up by your February 23, 1999 letter have been resolved by a combination of discussions that I have had with Bob Egan of your staff, and an attached Project Procedure Description. This Project Procedure Description defines activities that may not have been clear in our original submittal.

USFRS is eager to proceed with this project. If you believe more information is necessary, or there are additional questions, please contact either Martin Bergstedt, Vice President/General Manager or myself at (651) 638-1300.

US FILTER RECOVERY SERVICES INC.



George Anderson, CHMM

Director of Environmental Compliance and Safety

Cc Bob Egan, US EPA, Region V
Karen Struthers, MPCA
Joe Curruth, MPCA

XL Project Procedure Description

US Filter Recovery Services – Roseville

USFRS envisions this project as examining how effectively eliminating selected regulatory requirements can promote legitimate recycling and, testing to insure this relaxation does not compromise the environment. USFRS is a fully permitted hazardous waste treatment and storage facility. All XL wastes will be handled as hazardous wastes, and only in permitted processes and locations.

Facilities that install ion exchange systems generally use large volumes of water. The ion exchange systems allow a company to reuse their wastewater, minimizing their water use, and possibly avoiding the need to purchase additional SAC units (private industry contribution to WWTP infrastructure) from their public wastewater treatment facility. There is a wide range of business types that take advantage of these systems. So it is difficult to describe a "typical" user. For the purpose of the XL Project, we will focus on businesses that generate a "derived from" F006 ion exchange resin. A metal finisher or printed circuit board manufacturer would fit this description.

The ion exchange system, which looks similar to a water softener unit, would be directly plumbed into a current process. The cans are sturdy multiple-use, DOT approved, containers. These cans would be left as part of the process until their resins became spent. At that time, USFRS would bring a new can, containing fresh resin, and exchange it for the spent can. There would be no long-term storage of spent canisters at a generator facility. USFRS would then transport the canister, under a bill-of-lading, back to our facility. There, the resin will be removed and regenerated. The canister will be refilled with fresh resin, and prepared for shipment to the next customer.

All appropriate information from these transactions would be recorded and submitted to the participating agencies as per our project agreement. USFRS would retain copies of these bills-of-lading indefinitely.

At this time, US EPA is considering delisting F006 resins. This XL Project could provide information that could aid in that determination.

Facilities that generate waste acid normally neutralize this on-site, and discharge the effluent to a wastewater treatment facility. When this acid is recycled, as opposed to treated and disposed, it changes the holding vessel from a Clean Water Act regulated vessel, to a RCRA regulated vessel. This initiates a number of added regulatory requirements that are costly and burdensome to industry. This discourages this legitimate form of recycling.

A participating generator, usually in the metal finishing or plating industries, will schedule a pickup with USFRS. In some cases, the spent acid would be pumped directly from a process vessel into a USFRS tanker. In other cases, the acid would be stored, then

pumped from a storage tank. If containers were used for storage, those would be picked up and transported back to USFRS for pumping. All containers would have to meet US DOT specifications. According to our sales staff, acid picked up would probably occur on a monthly basis. The current customers expected to participate do not have significant space available for storage. Consequently, they would have to remove spent acid on a frequent basis.

USFRS would transport spent acid with a permitted hazardous waste transporter. A bill-of-lading, which contains the same information found on a hazardous waste manifest, would be used as the transportation document. The bills-of-lading would be retained by USFRS indefinitely.

At USFRS, the acid would be recycled. The acid generated from our process would be either be used on site or sold to our customers. The distilled water also generated during recycling would be reused in our processes. The metal sludges would be reclaimed at an off-site facility.

USFRS would provide the appropriate agencies summary reports of all activity, as prescribed by the project.