

CORRESPONDENCE/MEMORANDUM

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HW CMEL
STATE OF WISCONSIN
246004330

DATE: February 27, 1991
TO: Cook Composites and Polymers SED Casefile
FROM: Patrick Brady
SUBJECT: 2-11-91 Inspection at Cook

FILE REF: 4430

I talked today with Craig Bostwick, Manager of Safety and Environmental Compliance - Operations, Cook Composites and Polymers, regarding the compliance inspection I performed there on 2-11-91. I asked Mr. Bostwick how the determination is made that the ash from the solid waste incinerator is not a hazardous waste. He said that during the closure of the facility numerous tests had been done to close the unit as a hazardous waste management unit and showed the ash not to be hazardous. He said that the ash now goes to the Parkview landfill and that they had required testing using TCLP and the ash was not hazardous. Parkview said that no further testing would be required by them until 1993 as long as the material that is incinerated doesn't change. I also asked whether any waste received from offsite and stored in Tank #1 (licensed storage) was ever placed in Tanks #2, #3, or #4 (unlicensed storage). He said he wasn't sure what had always been done in the past, but he was aware that they were not allowed to do that. I went through the various points of non compliance from the inspection and Mr. Bostwick pointed out that the facility is not accepting waste from offsite that is not planned or permitted to be used in the incinerator. I had thought otherwise from my inspection, but I did not have any proof so I deleted it from my points of non compliance. We discussed the other points of non compliance and Mr. Bostwick felt that the facility would be able to come into compliance with them.

c. Bureau of Solid Waste Management-HWMS-SW/3
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