



→ SER Casefile (ANNEX)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**BRRTS  
Duplicate**

April 17, 2000

REPLY TO THE ATTENTION OF: DW-8J

Ms. Lynda Wiese  
Bureau Director  
Bureau of Cooperative Environmental Assistance  
Wisconsin Department of Natural Resources  
101 S. Webster St., Box 7921  
Madison, WI 537-7-7921

246 004 330  
HW/LIC

RE: ECAs - Proposal  
Cook Composites and Polymers Co., Saukville, Wisconsin  
WID 980 615 439

Dear Lynda:

This letter summarizes U.S. EPA's responses to specific issues raised during a conference call on April 6, 2000. As you recall, U.S. EPA and WDNR staff discussed the Environmental Cooperative Agreement (ECAs) proposal for the Cook Composites and Polymers, Co. (Cook) facility in Saukville, Wisconsin.

In that meeting, U.S. EPA agreed with WDNR's intent to issue a letter to Cook acknowledging the timely receipt of their permit application for renewal and reiterating that existing permit conditions continue in force until WDNR completes action on the application.

If Cook issues an "Intent Not to Comply" with the MACT rule no later than October 1, 2000, which would require the incinerator to become inactive by October 1, 2001, U.S. EPA recognizes that review, modification, and approval of a trial burn plan and the subsequent trial burn are not likely to be completed by the 2001 date. Thus, U.S. EPA believes that WDNR and Cook can forgo a trial burn as part of permit reissuance. However, if Cook issues an "Intent to Comply" with MACT, U.S. EPA believes that, as an indication to U.S. EPA and WDNR of continued operation, the trial burn must be included in the renewal process. This approach does not exempt Cook from the requirements of the Clean Air Act or any applicable Wisconsin state regulations.

The U.S. EPA believes that processing Cook's permit renewal is important because the renewal requires the addition of new RCRA requirements for regulated units that are not closing (e.g., Subpart CC). It is my understanding that WDNR believes Cook intends to close all of its regulated units at the Saukville facility at the same time its incinerator becomes inactive. In this situation the renewal of Cook's permit may be of less importance than if Cook intended to operate those units indefinitely. The U.S. EPA recognizes that WDNR can and should prioritize their permit workload by importance. We appreciate the opportunity to review the draft letter (regarding the continuance of permit conditions) and the next version of the ECA proposal and will prioritize our review to meet your schedule.

We appreciate the opportunity to be involved in a project with such a significant potential for waste minimization and pollution prevention. If you have any questions, please call me at (312) 353-9317.

Sincerely,



Todd Ramaly  
Technical Support and Permitting Section

cc: Lynn Persons, WDNR  
Pat Brady, WDNR  
Harriet Croke, U.S. EPA, Chief, TSP  
Marilou Martin, U.S. EPA, OSEA  
Gary Victorine, U.S. EPA  
Karl Bremer, U.S. EPA, Chief WMB  
Mary Mcauliffe, U.S. EPA, ORC  
Rachel Rineheart, U.S. EPA, ARD