

Brady, Pat J

From: Mike Gromacki[SMTP:Gromacki@ccponline.com]
Sent: Tuesday, December 04, 2001 7:41 AM
To: 'Ramaly.Todd@epamail.epa.gov'; bradyp@dnr.state.wi.us; Mike Gromacki
Subject: RE: memo to file regarding Cook's new status

Hw/LIC

Todd- I have reviewed your memo to file and have only two corrections or clarifications, both related to closure activities;

1. CCP and WDNR established a closure plan which called for the two-phase closure of the tank and piping systems. The first phase was closure of the tanks and piping downstream of the TETF (or MPPE). This was completed in early October and observed and certified by a P.E. -the downstream tanks are clean closed. The upstream (of the TETF) tanks were to remain in hazardous waste generator service so they are to be closed in the second phase. The cleaning and closure is to be completed in the next two weeks and PE certification is scheduled for January 1, 2002. CCP ceased the incineration of hazardous waste prior to October 1, 2001. Since CCP was (and is) completing batch analysis for characteristic prior to incineration, the two-phase closure transition was considered appropriate by CCP and WDNR.
2. After further review of the small container storage, the area was not intended or operated as a storage area (i.e. greater than 90 days) and therefore CCP and the WDNR determined that the area did not require closure.

Pat - Let me know if I have missed anything, but I think I have captured the key points.

Mike Gromacki
CCP

-----Original Message-----

From: Ramaly.Todd@epamail.epa.gov [mailto:Ramaly.Todd@epamail.epa.gov]
Sent: Wednesday, November 28, 2001 10:48 AM
To: bradyp@dnr.state.wi.us; gromacki@ccponline.com
Subject: memo to file regarding Cook's new status

<< File: memotofile.wpd >> Todd D. Ramaly, P.E.
Environmental Engineer
Technical Support and Permits Section - RCRA
U.S. EPA - Region 5
----- Forwarded by Todd Ramaly/R5/USEPA/US on 11/28/01 08:58 AM -----

Todd Ramaly
To: Wen Huang/R5/USEPA/US@EPA
11/27/01 cc:
09:17 AM Subject: memo to file regarding
Cook's new status

Wen,

I would appreciate your views on this memo to file. My goal was to make Cook's future situation transparent to anyone, especially enforcement,