

PPC 9528.1986(09)

COMPLYING WITH RCRA INTERIM STATUS STANDARDS  
WHILE DEVELOPING A PERMIT APPLICATION

October 27, 1986

Mr. Frank L. Deaver  
Corp. Environmental Services Mgr.  
Tektronix, Inc.  
Tektronix Industrial Park  
P.O. Box 500  
Beaverton, Oregon 97077

Dear Mr. Deaver:

Thank you for your letter of October 1 bringing to my attention the problems you have encountered in trying to comply with the RCRA interim status standards (40 CFR Part 265) while simultaneously developing a permit application to address the permit requirements of 40 CFR Part 264. Mr. Ken Feigner in EPA's Regional Office in Seattle, Washington is responding to your questions regarding the particular circumstances of the permitting efforts at your facility and the inspection conducted last February by EPA and the State of Oregon.

As you are aware, interim status facilities must comply with the Part 265 standards (or State counterparts, in authorized States) until final disposition of the RCRA permit. If some of the common elements of Parts 264 and 265 are improved in the process of developing a permit application (e.g., waste analysis plan), then it may benefit the facility to replace or append the interim status document with the newer version. I agree with you that the problem of trying to meet both sets of standards is probably shared by other existing facilities that are pursuing RCRA permits. I will relate your experience to others in the Agency who are involved in enforcing the RCRA program. My office will also continue to ensure that enforcement activities are coordinated with any concurrent permitting work at a facility.

RO 12768

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If I can be of further assistance you, please let me know.

Sincerely,

Marcia E. Williams  
Director  
Office of Solid Waste

cc: Ken Feigner, EPA Region 10  
Fred Hansen, Oregon DEQ  
Gene Lucero, EPA OWPE w/copy of incoming  
Lloyd Guerci, EPA OWPE w/copy of incoming  
  
Regional H.W. Branch Chiefs w/copy of incoming