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United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

March 4, 1993

Mr. Edward J. Ciechon, Jr.
Chief Counsel
Sun Company, Inc.
Ten Penn Center 1801 Market Street
Philadelphia, Pennsylvania 19103-1699

Dear Mr. Ciechon:

Thank you for your December 10, 1992, letter requesting the continuation of the existing Toxicity Characteristic (TC) compliance date beyond January 25, 1993. This extension had been given to facilities reinjecting produced ground water as part of state-authorized cleanup activities. After that date, if hazardous waste is generated during site clean up activities, the reinjection operation can only be performed in underground injection wells that are permitted under the RCRA regulations or in the Class IV injection wells permitted under the UIC program. EPA requires that non-UST hydrocarbon recovery operations not meeting these two conditions but expecting to continue reinjection, must submit a RCRA Part A permit application and obtain interim status, within 30 days after the January 25, 1993 deadline (see 40 CFR 270.10(e)(1)(ii)).

The Agency has been aware of the shut-down of some reinjection operations since the expiration of the TC compliance date extension and we are considering alternatives.

Sincerely,
Sylvia K. Lowrance, Director
Office of Solid Waste

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