

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF WATER
AND WASTE MANAGEMENT

Nov. 3, 1980

Mr. Don Long
Manager of Material Services
Burr-Brown Research Corp.
P. O. Box 11400
Tucson, Arizona 85734

Dear Mr. Long:

This is in response to your letter of October 1, 1980, which has been referred to me for reply. In it, you asked us to provide you with copies of the Regulation Interpretation Memoranda (RIM) for 3 subjects:

- 1) when is a hazardous waste first subject to regulation;
- 2) clarification of the definition of "Totally enclosed treatment facility"; and
- 3) application of the regulation to the neutralization process.

You also asked whether you are required to register as a waste treatment facility, if you are not required to register as a waste generator.

EPA is presently writing RIM's for the subjects you mentioned so none have been issued. I have placed your name and address on our mailing list for these and all future RIM's, as they become available. Concerning your question about whether you are required to register as a waste treatment facility, I advise you to read the parts of the May 19, 1980 hazardous waste regulations concerning handlers of hazardous waste facilities pp. 33154 - 33258 (40 CFR Parts 264 and 265). You should consider your company's situation in light of the regulations to decide if you need to register. Waste generators are discussed on pp. 33140 - 33148 (40 CFR Part 262). Whether or not you are required to file under Part 262 does not affect whether you need to file under Parts 264 and 265.

I hope this has cleared up your concerns. Please let me know if you have further questions.

Sincerely,

Filomena Chau
Environmental Protection Specialist
Office of Solid Waste (WH-562)

BURR-BROWN

October 1, 1980

Eileen Claussen
Office of Solid Waste (WH-562)
U. S. Environmental Protection Agency
401 M Street S. W.
Washington, D. C. 20460

Dear Ms. Claussen,

Please provide me with the following R. I. M. 's:

- 1) When is a hazardous waste first subject to regulation.
- 2) Clarification of the definition of "Totally enclosed treatment facility".
- 3) Application of regulation the neutralization process.
- 4) If I'm not required to register under R.C.R.A. as a waste generator, am I required to register as a waste treatment facility.

Your time and efforts are greatly appreciated.

Yours Truly,

Don Long
Manager of Material Services
Burr-Brown Research Corp.
P.O. Box 11400
Tucson, Arizona 85734