



**UNITED
INDUSTRIAL
SERVICES**
DIVISION OF UNITED OIL RECOVERY INC.

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P.O. BOX 902 MERIDEN CT 06450-0902
TELEPHONE (203) 238-6745

"An Equal Opportunity Employer"

May 8, 2009

Mr. William Chin
USEPA Region 1
One Congress Street, Suite 1100 (SEL)
Boston, MA 02114-2023

RECEIVED

2009 MAY 14 P 2: 06

EPA ORC
OFFICE OF
REGIONAL HEARING CLERK

Re: Bridgeport United Recycling, Inc.
TSCA-01-2009-0040

Dear Mr. Chin:

This letter constitutes Bridgeport United Recycling's (BUR's) "Answer" to your complaint, dated March 19, 2009 regarding a manifest violation under 40 CFR Part 761 involving polychlorinated biphenyls. BUR finds the allegations accurate and factual except as described below.

Paragraph 11 BUR denies this allegation in that it does not specify that the sample was provided to BUR by Connecticut Transfers or its agent. BUR was not responsible for the preparation of the waste profile. No representative of BUR was onsite at Old Bridgeport Brass Company until out truck arrived to pump the waste.

Paragraph 19 BUR denies this allegation. BUR has no specific information regarding CTDEP's activities at the original generator's site and we believe any such activities are largely irrelevant to this case.

Paragraph 24 BUR denies this allegation. BUR is only the "generator", as defined in 40 CFR 761.3, with respect to mixture sent to Norlite Corporation and described on Manifest 000047996UIS. Connecticut Transfers is the generator up to and until BUR prepared the shipment to Norlite.

BUR also accepts the reduction in penalty to \$26,000. Depending upon the amount of time required to finalize the CAFO, BUR will be prepared to make full payment of the penalty by July 31, 2009. If the penalty payment due date is before July 31, 2009, BUR proposes to make a payment of \$5,000 on the payment due date and a payment of \$21,000 thirty days after the due date.

Please feel free to contact me if any of this information is unacceptable to the Agency.

Sincerely,

William Morris
VP, Environmental Affairs
UNITED OIL RECOVERY, INC.

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Service

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