

From: <JuliaB@email.romic.com>
To: DCWIC03.DCWCP05(HISEL-MCCOY-SARA),DCWIC01.IN("caro...
Date: 8/20/98 12:44am
Subject: Sara 313 Fuels

This is a request for your interpretation of whether waste fuels that are sent to cement kilns will be required to be considered a material that is processed, or otherwise used and to be reported as a part of our threshold calculations for TRI reporting. In our situation, we are paying the kiln to accept the waste fuels. Romic blends these wastes but does not get paid for them nor do we combust them onsite. We pay for them to be combusted at cement kilns the same as we pay for materials to be combusted at incineration facilities.

Since these fuels would be a substantial impact on our report and our computer software and data base would have to be adjusted to accommodate fuels, we need to get an answer to this question as soon as possible.

Thank you for your help in this matter.

I am available at (650)462-2355 if you have any questions. My email address is
juliab@romic.com