

Hooper - Atlanta

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An **IC Industries** Company

Memorandum

APD
John Jones

Date: July 21, 1980

Subject: RCRA (Resource Conservation and Recovery Act)

From: C. B. Mallory

To: R. L. Ward
Troy Office

This Act, under the Environmental Protection Agency, became finalized May 19, 1980.

Under the Act, we, (the plants and each individual warehouse, because of our product containing asbestos, phenol, formaldehyde, lead and barium) become generators of hazardous waste. As such, we are required to apply for an EPA identification number within 90 days after the effective date. In the interest of saving time and to hold any confusion the requirements might cause to a minimum, I have completed and mailed the application for each warehouse. In due course, EPA will mail an identification number to each warehouse -- please let me know these numbers when they become available.

And now for the bad part: Six months after the effective date or beginning November 19, 1980, the Act requires that all shipments of waste be accompanied by a shipping manifest. The manifest is to detail what the waste is made up of, list the transporter with his EPA identification number and the name and address of the disposal site along with its EPA identification number. It is our responsibility to see that a signed copy of each manifest is returned to us by the disposal site. Should a copy not be returned, we must follow up; and, if we still fail, a report must be submitted to EPA. Annually, each March, a summary of the previous year's activity must be submitted. Records are to be maintained for three years.

I have done about all I can do from here -- each warehouse should start thinking about handling its own situation. November is not far away.

I am sending each warehouse a copy of their application for an EPA identification number, the information contained in the packet the

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