



CON 12-15
Doc #16557

ENVIRONMENTAL PROTECTION DIVISION
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THOMAS J. VILSACK
GOVERNOR

SALLY J. PEDERSON,
LT. GOVERNOR

February 19, 1999

DEPARTMENT OF NATURAL RESOURCES
PAUL W. JOHNSON, DIRECTOR

Schaeff Incorporated
Attn: Mr. Robert Withee, Manufacturing Manager
P.O. Box 9700
Sioux City, Iowa 51102-5111

SUBJECT: Paint Manifest Review and Related Matters - Woodbury County

Dear Mr. Withee:

Thank you for sending me a copy of the manifest report by SAFETY KLEEN for the old paint in the Paint Tank buried in the ground. As SAFETY KLEEN has indicated, this old paint is classified as a "hazardous waste." As such, it must be disposed of in accordance with the RCRA program requirements. Be advised that RCRA may have an interest in the closure of this hazardous waste tank, and it is Schaeff's obligation to comply with all applicable RCRA requirements.

Mr. Tom Collins of the Iowa Department of Natural Resources underground tank section (UTS), indicated that the Paint Tank can be "closed" and the tank removed from our tank registry "active" status by completing the following steps. First, remove all product from the tank. The tank can either be removed or closed in place by filling with an inert solid material. Closing in place is not recommended, but is acceptable if done correctly. Please contact me if you choose to close the tank in place for details and requirements on this tank closure method. At a minimum, one soil and one groundwater sample are needed to be analyzed for volatile petroleum hydrocarbons using Method OA-1. We would also require any analytical results from samples collected in response to the RCRA program requirements associated with this hazardous waste tank closure.

If you have any question regarding the tank closure, feel free to contact Tom Collins (515/281-8879) in the UTS or myself. If you have questions regarding RCRA requirements, please contact Mr. Brian Mitchell (913/551-7633). If you have any other concerns, please feel free to contact me anytime.

Sincerely,

Bryon Whiting, Environmental Specialist
bwhitin@max.state.ia.us
Compliance and Enforcement Bureau

BW:js

- c: -Tom Collins, UTS, LQB, EPD, DNR, Des Moines
-Mary Kay Rogge, SWS, LQB, EPD, DNR, Des Moines
-Brian Mitchell, Iowa RCRA Program, EPA, 726 Minnesota Avenue, Kansas City, KS 66101

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