



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

March 31, 1986

CTD980524037

AVCO LYCOMING BLDG 19 COMPLEX
THOMAS A ELIJICH
550 MAIN ST
STRATFORD

CT 06497

Dear Sir:

This letter is to inform you that as of January 31, 1986, authority to administer the hazardous waste program under the Resource Conservation and Recovery Act (RCRA) of 1976, in the State of Connecticut has reverted to the U.S. Environmental Protection Agency (EPA). RCRA provides that any state with interim authorization which does not receive Final Authorization by January 31, 1986, will automatically lose such authorization on that date. Connecticut received Interim Authorization on June 29, 1983, and has applied for Final Authorization. Connecticut's authority to administer the RCRA hazardous waste program reverted to the Federal Government on January 31, 1986.

As a result of this reversion, you are immediately subject to and must comply with all applicable Federal hazardous waste requirements found in Title 40 of the Code of Federal Regulations, Parts 124, 260-267, and 270. Copies of the Code of Federal Regulations are available for sale in two volumes (Parts 100 to 149 and Parts 190 to 399) from the Superintendent of Documents, U.S. Government Printing Office, Washington D.C. 20402.

You will remain subject to the Federal Regulations until Connecticut receives Final Authorization. Reversion does not mean that you are no longer subject to Connecticut hazardous waste requirements. These requirements continue in force, unchanged, under State law. You are, therefore, required to meet those requirements including submittal of reports to the State as required by Connecticut Hazardous Waste Management Regulations. After reversion, RCRA permits issued by the State, while it was authorized, remain in effect.

EPA and Connecticut will enter into an agreement which specifies those activities which will be handled by the Federal Government and those by the State. Attached is an information sheet specifying the reporting requirements for the EPA program during the period of reversion. Copies of reports required by EPA under reversion should also be sent to the State.

You should familiarize yourself with the Federal Regulations in order to understand what, if anything, you will have to do differently in order to comply with the Federal Requirements. Questions regarding reversion can be directed to the RCRA Hotline, toll-free at (800) 424-9356, or in Washington, D.C., at 382-3000. Questions can also be directed to the State or EPA contact listed below.

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Attachment - 2 pages

Reporting Requirements During Program Reversion

Note: Reporting contacts for EPA and Connecticut:

EPA: US EPA, CT/ME Waste Management Branch, JFK Federal Building, Room 1903, Boston, MA, 02203.

Attn: Connecticut Reversion Analyst

Connecticut: Director, Hazardous Material Management Unit, Department of Environmental Protection, State Office Building, 165 Capitol Avenue, Hartford, CT, 06106.

Federal/State Reporting Requirements for Connecticut Hazardous Waste Generators; Transporters; and Treatment, Storage and Disposal (TSD) Facility owners/operators are as follows:

Biennial Reports: Biennial reports (40 CFR §262.41) are to be submitted to EPA and Connecticut by March 1, 1986 and every two years thereafter.

Changes During Interim Status: Connecticut TSD facilities with Federal Interim Status remain under Federal jurisdiction. For changes specified in 40 CFR §270.72, owners or operators of facilities with interim status must comply with 40 CFR §270.72 and submit revised Part A permit applications to EPA and Connecticut.

Closure Plans, Post-Closure Plans, Notification of Closure: The owner/operator of a TSD facility must submit closure and post-closure plans and notification of closure to EPA and Connecticut.

Contingency Plan Incident Report: All applicable contingency plan incident reports required by 40 CFR §265.56 and 40 CFR §264.56 must be submitted to EPA and Connecticut.

Delisting Petitions: Any person seeking to exclude any hazardous waste regulated under the U.S. EPA regulations must submit the petition to the Office of Solid Waste, U.S. EPA; 401 M Street, S.W., Washington, D.C. 20460.

Financial Responsibility: Financial responsibility instruments are to be submitted to EPA and Connecticut. (Those owners/operators who submitted financial responsibility instruments to EPA or the State prior to January 31, 1986, will not be required to submit anything additional to EPA.)

Groundwater Monitoring Data: All groundwater monitoring data required to be reported by 40 CFR §265.94, or the permit must be submitted to EPA and Connecticut.

Hazardous Waste Spills: Transporters are required by 40 CFR §263.30 to notify the Office of Hazardous Materials Regulations, Materials Transportation Bureau, United States Department of Transportation, Washington, D.C. 20590, in the event of a discharge of hazardous waste during transport. They are also to immediately notify the Connecticut Department of Environmental Protection, and also give notice, if required by 49 CFR §171.15, to the National Response Center.

International Shipments: Any person who exports hazardous wastes to a foreign country or imports hazardous wastes from a foreign country must continue to notify EPA and Connecticut of its intent prior to shipment. See 40 CFR §262.50.

Manifest Exception and Discrepancy and Unmanifested Waste Reports: Manifest exception, discrepancy reports, and unmanifested waste reports are to be submitted to EPA and Connecticut.

Notification: Any person required to notify under Section 3010 of the Resource Conservation and Recovery Act of 1976, as amended, must notify EPA and Connecticut.

Permits: All correspondence regarding Federal Part B permit applications must be submitted to EPA. All correspondence regarding State permit applications must be submitted to Connecticut.

U.S. EPA Identification Numbers: The U.S. EPA has sole authority to issue U.S. EPA identification numbers. However, applicants may obtain I.D. numbers through Connecticut.

Withdrawal: Any generator, transporter, or TSD owner/operator who wishes to withdraw from the system must concurrently notify EPA and Connecticut.

The State Contact is:

Edward Parker, Assistant Director
Hazardous Materials Management Unit
Department of Environmental Protection
State Office Bldg./165 Capitol Ave.
Hartford, CT 06106
(203)566-4869

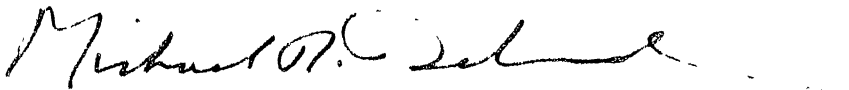
The EPA Contact is:

Steven Fradkoff, Environmental Engineer
U.S. Environmental Protection Agency
Waste Management Division (HSC)
JFK Federal Building, Room 1903
Boston, MA 02203
(617)223-1724

Please note, questions on reversion should be directed as indicated above. Submittals of required reporting information should be addressed to the contacts indicated in the enclosed attachment.

Your cooperation in this matter is appreciated and will enable the management of hazardous waste to proceed efficiently in Connecticut.

Sincerely,



Michael R. Deland
Regional Administrator

Attachment

cc: Commissioner Pac
CT DEP