Georgia Department of Natural Resources

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205 Butler Street, S.E., Suite 1066, Atlanta, Georgia 30334 Lonice C. Barrett, Commissioner Environmental Protection Division Harold F. Reheis, Director 404/657-8831

September 24, 1999

Mr. Jeffrey T. Pallas, Chief South Enforcement & Compliance Section Enforcement and Compliance Branch U. S. EPA, Region IV 61 Forsyth Street, 10th Floor Atlanta, Georgia 30303

SUBJECT: Bio-Lab, Plants 2 and 4 Conyers, Rockdale County EPA I.D. Nos. GAD069200061 and GAD991274820

Dear Mr. Pallas:

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On July 21, 1999, joint EPA and Georgia EPD inspections were performed at the subject locations. Pursuant to the Memorandum of Agreement, enclosed are copies of the Inspection Reports and letters. Any additional information regarding these facilities may be obtained by contacting Renée Hudson Goodley, Program Manager of the Generator Compliance Program.

Sincerely,

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Gennifer R. Kaduck Chief Hazardous Waste Management Branch

JRK/GTT/gat Enclosures (3) Inspection Reports (2) Compliance Status Letter (1)

c: Renée Hudson Goodley Jack Dempsey

File: EPA Correspondence Bio-Lab, Plant 2, Conyers (inactive) Bio-Lab, Plant 4, Conyers r:\greg\biolab.epa

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Georgia Department of Natural Resources

205 Butler Street, SE, Suite 1066, Atlanta, Georgia 30334 Lonice C. Barrett, Commissioner Environmental Protection Division Harold F. Reheis, Director 404/657-8831

September 14, 1999

Mr. Rex Stutchman, III Environmental, Health and Safety Specialist Bio-Lab 1700 Old Covington Highway Conyers, Georgia 30012

SUBJECT: Conditionally Exempt Small Quantity Generator Requirements Bio-Lab, Plants 2 and 4 Conyers, Rockdale County EPA I.D. Nos. GAD069200061 and GAD991274820

Dear Mr. Stutchman:

On July 21, 1999, Denisse Davila, of U.S. EPA, and I conducted a hazardous waste generator compliance and evaluation inspection of your facility located in Conyers, Rockdale County, Georgia. This inspection was performed to determine your facility's compliance status with Georgia's Rules for Hazardous Waste Management ("Rules"), Chapter 391-3-11. It was determined that on this date no violations of the Rules were observed.

Based upon the information obtained during the inspection. your facility generates less than 220 pounds of hazardous waste per month. This indicates that your facility is operating as a Conditionally-Exempt Small Quantity Generator. Our records indicate that your facility notified as a Small Quantity Generator of hazardous waste. You are requested to change your hazardous waste generator status by submitting a subsequent EPA 8700-12 form, which was given to you during the inspection. Please ensure that Box B, Subsequent Notification, and Box C, Current EPA Identification Number, are completed. Ensure that you update any information that has changed since the last notification form was completed. Please be advised that your current hazardous waste generator status will remain in effect until EPD has received your completed Subsequent Notification Form.

Currently your facility has two EPA Indentification Numbers. As you requested, the EPA Identification Number assigned to Plant 2 (GAD069200061) will be deactivated, because the plants are on contiguous property.

Please find the enclosed copies of the Generator Inspection Reports used during the inspection. Should you have any questions, please feel free to contact me. Thank you for your cooperation in protecting Georgia's environment.

Sincerely.

Greg Thomas Environmental Specialist Generator Compliance Unit

GTT/gat

Enclosures (2): Generator Inspection Reports c: Jack N. Dempsey Renée Hudson Goodley Jeffrey T. Pallas, EPA File: Bio-Lab, Plant 2, Conyers (inactive) Bio-Lab, Plant 4, Conyers