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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

NOV 30 1992

Mr. David R. Brentzel  
Environmental Engineer  
Chemical Waste Management, Inc.  
1090 Northchase Parkway, Suite 290  
Marietta, Georgia 30067

Dear Mr. Brentzel:

Thank you for your letter of October 28, 1992, requesting an update, if any, of our position regarding M G Industries intention to purchase existing compressed gas cylinders from Los Alamos National Laboratory (LANL) and process the hazardous residues removed from these cylinders at their Pennsylvania facility.

The position taken in our July 1, 1991, letter to M G Industries has not changed. We understand that M G Industries intends to reuse the purchased cylinders in a manner consistent with a permit they have for such activities, issued by the State of Pennsylvania. We do not believe that such reuse triggers RCRA solid waste regulation.

Should you have any further questions regarding this issue, please contact Mr. Joseph Schultes, of my staff at (214) 655-2192.

Sincerely yours,

Allyn M. Davis, Director  
Hazardous Waste Management Division (6H)

cc: EPA Region 3 (Mary Letzkus) (3HW/6H) 29 30 31  
✓ NMED  
Harry T. Season, Jr. (LANL)

