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January 17, 2000

Pennsylvania Department of Environmental Protection
208 West Third Street
Suite 101
Williamsport, Pa. 17701-6448
Attention: Patrick Brennan

37-00030-02
030-05980

Re: Notice of Violations – Hazardous Waste Inspection PAD987387750

Dear Mr. Brennan,

We respond to your Notice of Violations dated January 14, 2001 as follows:

Violation 1: Waste paint filters and paper towels.

Immediately following your inspection on November 30, 2000, Safety Light Corporation stopped the practice reported in Violation #1. The above-mentioned waste generated from our painting and screening operation is now being disposed of by Safety Kleen Corporation in accordance with the applicable requirements.

Violation 2: Large Quantity Generator (LQG).

The hazardous materials described in Violation 2 were shipped for disposal on November 1, 2000.

The roof on the building in which it was stored had deteriorated to the point that it was unsafe to enter. Because we have no need for this building, we elected not to repair the roof and to instead discontinue use of the building. However, before blocking access to the building, we thought it would be prudent to dispose of materials that were stored inside. To this end, we hired Safety Kleen Corporation to profile the material in question and manifest it for proper disposition.

Although we unwittingly signed the manifest that listed the drums by their capacity, none of the drums were actually full. We are told that some had very little material in them. Nevertheless, this was a one-time event and will not be repeated, as our ongoing business does not cause us to generate these types of hazardous wastes. In the future, we will make sure that we and /or our subcontractor notify the appropriate parties in advance of such activities.

SAFETY LIGHT CORPORATION • 4150-A Old Berwick Road • Bloomsburg, PA 17815
570.784.4344 • fax 570.784.1402 • www.safetylight.com

mtm1
NMSS/RGN MATERIALS-0001



Violation 3: Disposal of Fluorescent Lamps.

Immediately following your inspection on November 30th, Safety Light Corporation discontinued disposing of used fluorescent lights in the plant trash except for compliant lamps which we have letters from the manufacture that the tcip has been done on them and are acceptable for normal burial. We have contracted with Safety Kleen Corporation to dispose of any fluorescent lights that we generate that do not meet the above condition.

Violations 4: Unidentified Hazardous Waste.

As described at our meeting on November 6, 2000 at the Nuclear Regulatory Commission's Region 1 office and attended by representatives of the DEP, the NRC, and the EPA, this waste is the result of our efforts to remediate the underground storage silos on site.

In early 1999, we contracted IT Corporation to remove the silos and their contents and package the resulting waste into containers in quantities suitable for offsite disposal. Unfortunately, this has not occurred. Although the silos and their contents have been taken out of the ground, the waste was not properly segregated and it is unacceptable to any potential long term disposal site in its' current form.

The proper resolution of this problem requires a re-sorting and re-packaging of the waste. This process will provide the opportunity to identify and segregate the various waste components into disposable units. We believe that it is IT Corporation's responsibility to perform this task and we are continuing to pursue them to take the necessary steps to correct this problem. The re-sorting of the material will allow us to provide the Department with an accurate determination of the hazardous waste component of the total waste.

Violation 5: Lack of Secondary Containment and Proper Labeling.

This also refers to the above mentioned silo waste. We expected this material to be offsite in long term disposal facilities before now. Unfortunately, IT Corporation's failure to adequately segregate the waste has forced us into this existing short-term storage dilemma.

As mentioned above, we are attempting to correct this problem by pushing IT Corporation to re-sort the material to allow us to ship the waste offsite.



Violation 6: Existing Soil Waste.

This waste resulted from soil and groundwater sampling that was done in 1990. It is our intention to include this material with the silo contents for off-site disposal.

The November 6, 2000 meeting, referred to earlier in this letter, was held at our request in order to provide us with the opportunity to bring all interested parties up to date with the status of our silo remediation project and to attempt to develop a consensus as to how we should proceed, making the best use of our finite financial resources. We left the meeting with the belief that everyone was in agreement that our highest priority was to take the necessary steps to get IT Corporation to re-sort and re-package the silo waste thereby making it suitable for offsite disposal. This is the course that we have been following. Unfortunately, IT Corporation is not yet in agreement that it is their responsibility and it now appears that we will have to initiate legal proceedings against them. We hope that such action may encourage them to reconsider their position and move quickly to rectify the existing problem. Due to our limited financial resources, we think that this is our most prudent course of action. Spending additional funds at this time to correct Violations 4, 5, and 6 would severely limit our future ability to remediate other on-site problems.

We request a meeting with you at your earliest opportunity to discuss this matter more fully. We believe that this meeting should include the appropriate representatives of not only your department, but also representatives from the PaDEP Bureau of Radiation Protection, the NRC and the EPA.

We look forward to hearing from you soon.

Regards,

Larry Harmon
Larry Harmon
Plant Manager