

US EPA ARCHIVE DOCUMENT

October 21, 1998

U.S. FILTER RECOVERY SERVICES, INC.
2430 ROSE PLACE
ROSEVILLE, MN 55113

TELEPHONE 651-638-1300
FACSIMILE 651-633-5074

Christopher Knopes
Office of Reinvention Programs
US EPA Mail Number 1802
401 M Street
Washington DC 20460

REASON: XL Project Proposal
US Filter Recovery Services Inc.
EPA ID# MND981098478
2430 Rose Place
Roseville, MN 55113

Dear Mr. Knopes:

US Filter Recovery Services Inc. of Roseville, Minnesota would like to submit the attached XL Project proposal for your review and approval. Also attached are Stakeholder "Statements of Support" from our Stakeholder Group. Additional Stakeholder statements will become available as we receive them. Some of our Stakeholders preferred to base their statements upon the completed proposal after it was submitted to US EPA.

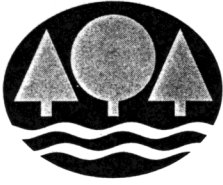
We are looking forward to working with you and your staff on what we consider a promising opportunity to help encourage higher forms of waste management, pollution prevention, and resource conservation.

Please use as contacts either myself or Martin Bergstedt, Vice President/General Manager. Our Office phone number is (651) 638-1300.

U.S. Filter Recovery Services Inc.



George Anderson, CHMM
Director of Environmental Compliance & Safety



Minnesota Pollution Control Agency

October 21, 1998

Ms. Carol Browner
Administrator
U.S. Environmental Protection Agency
41 M Street Southwest
Mail Code 1101
Washington, D.C. 20460

Dear Ms. Browner:

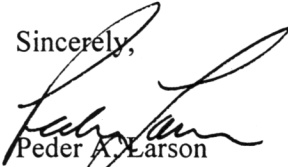
U.S. Filter Recovery Services, Inc. (USFRS) first approached the Minnesota Pollution Control Agency (MPCA) with an idea they deemed suitable for EPA's new Project XL program in the Spring of 1995. Since that time, both Project XL and the USFRS proposal have evolved considerably. USFRS has worked diligently with staff from MPCA, U.S. EPA Region V, local county regulatory agencies, and their Direct Stakeholder Group to develop a proposal that has meaningful consequence.

USFRS is a commercial hazardous waste treatment and recovery facility located in the Minneapolis-St. Paul metropolitan area. The facility has a solid environmental record since startup a decade ago and has provided the large number of metal-finishers, electroplaters, and printed circuit board manufacturers in the region the opportunity for advanced treatment and recovery. USFRS is primarily responsible for removing over 80 percent of the metal loading from industrial wastewater that is treated by the metropolitan POTW and discharged to the Mississippi River.

The MPCA fully supports the USFRS proposal and recommends that EPA accept the proposal for development of a final project agreement under Project XL. We believe that this proposal not only qualifies as an XL project, but furthers the CSI Metal Finishing initiative by providing flexibility in an area that really promotes the proper management of metal finishing wastes. The Resource Conservation and Recovery Act (RCRA) has offered recyclers of waste the incentive of reduced regulation since it was promulgated in 1976. RCRA, however, has not offered facilities that generate waste much incentive for getting their waste to the recyclers. The USFRS proposal tests the hypothesis that "less regulation will make the recycling choice easier."

We look forward to working with your staff on the USFRS project XL proposal.

Sincerely,



Peder A. Larson
Commissioner

PAL:jmp

cc: Lisa Lund, US EPA Office of Reinvention
Dave Ullrich, US EPA Region V
Jay Benferado, US EPA Office of Reinvention
Brian Barwick, US EPA Region V

520 Lafayette Rd. N.; St. Paul, MN 55155-4194; (612) 296-6300 (Voice); (612) 282-5332 (TTY)

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October 12, 1998

Mr. George Anderson, CHMM
Director of Environmental Compliance & Safety
U.S. Filter Recovery Services, Inc.
2430 Rose Place
Roseville, Minnesota 55113

Dear Mr. Anderson:

Thank You for the opportunity to serve as a Stakeholder on the XL Project. It has been a rewarding process for me.

As Fire Marshal for the City of Roseville, I have had many opportunities to observe the operations at U.S. Filter. One of the more notable attributes at the facility is the commitment to safety for both the employees and the surrounding community. I have experienced a complete attitude of cooperation when dealing with issues of compliance and problem solving.

Within the role of Stakeholder, I as City Fire Marshal, cannot provide an endorsement of the XL Project for the governing authority. However, as an individual who has a unique opportunity to observe the operations at the facility, and who must respond to emergencies involving the operations, I endorse the XL Project. The environmental benefits of this project are apparent.

Sincerely,

John P. Loftus

Cc; file
Director of Community Development
Fire Chief

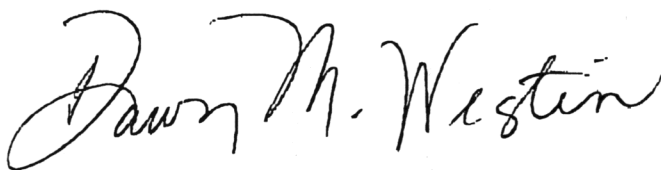
2000 CIVIC CENTER DRIVE • ROSEVILLE • MINNESOTA • 55113-1800
612-490-2200 • TDD 612-490-2205

UNISYS

October 19, 1998

Stakeholder Statement of Consensus

As a neighbor of US Filter Recovery Services, and a customer who may benefit in the future from the XL project proposed, Unisys appreciates the opportunity to be heard as a Stakeholder through the XL Project Stakeholder meetings. My support is squarely behind US Filter and the XL proposal in its final form, for submission to the EPA.

A handwritten signature in cursive script that reads "Dawn M. Westin". The signature is written in dark ink and is positioned above the printed name and title.

Dawn M. Westin
Unisys ESH Coordinator

STAKEHOLDER STATEMENT OF SUBSTANTIAL CONSENSUS

The following stakeholder/s support the US Filter Recovery Services XL
Project:

Name	Affiliation	Date
CAROL WIESSNER	MCEA	10.19.98

COMMENTS:

On behalf of the Minnesota Center for Environmental Advocacy (MCEA), I support the U.S. Filter Recovery Services (USFRS) submittal of its Project XL proposal. While MCEA recognizes that the proposal is not in the precise format suggested by EPA for the proposal, we believe the overarching intent of this proposal -- to more wisely manage waste streams through recycling and recovery options than to permit the discharge of millions of gallons of effluent to POTWs needlessly -- will bring about environmental benefits in terms of lessening an impact on POTWs and thereby, on our rivers. Additionally, by recycling & recovery options for USFRS users, it will decrease the need for the purchase of virgin hydrochloric acid & caustic soda, which take energy to make -- and the transportation impacts of delivering the material. Thus, producing more environmental benefits in terms of lessening the impact to our air, water from vehicle & power production emissions. Finally, by moving forward w/ this proposal, the state of Minnesota will be moving forward by elevating more USFRS users up the state's waste management hierarchy. It's a project that makes sense and we are eager to begin the FPA process in an effort to get more companies recycling & recovering their wastes.

STAKEHOLDER STATEMENT OF SUBSTANTIAL CONSENSUS

The following stakeholder/s support the US Filter Recovery Services XL
Project:

Name	Affiliation	Date
Ken Hutchinson	Nico Plating	10-15-98

COMMENTS: Our industry in today's world has become so heavily scrutinized by Agencies, special interest groups & the general public, that our involvement in handling hazardous waste, water reuse, alternative products & recycling has put us under the microscope. To this most of us have responded favorably. To let this wonderful opportunity pass by would be a great loss to all. All we are asking is a small favor, with minimum risk to expand our leading involvement in recycling & waste treatment. In return you will get our full cooperation and the dedicated hard work from the stake holders group. PLEASE give this a long hard look. We appreciate the opportunity to work with you on this.

Sincerely

Ken Hutchinson

STAKEHOLDER STATEMENT OF SUBSTANTIAL CONSENSUS

The following stakeholder/s support the US Filter Recovery Services XL Project:

Name	Affiliation	Date
JAMES SCHAEFER	USFRS OPERATIONS	10/21/98

COMMENTS:

PROJECT XL IS A BUILDING BLOCK FOR THE FUTURE OF USFILTER RECOVERY SERVICES & ITS CLIENTS. THIS DOCUMENT IS A STEP IN THE RIGHT DIRECTION FOR USFRS IN REMOVING 'HAZARDOUS WASTE' STATUS OF WASTE STREAMS BROUGHT INTO THE PLANT. ^{UNEXPECTED} IT WILL ALLOW FOR USFRS TO IMPLEMENT THESE POLICIES & PROCEDURES ON OTHER WASTE STREAMS THEY DEEM ACCEPTABLE FOR 'PROJECT XL WASTE' STATUS. I HOPE OTHER COMPANIES WILL BE ABLE TO SEE THIS PROJECT AS A BENEFIT TO THE INDUSTRY AS WELL AS THE COMMUNITY & BE ABLE TO IMPLEMENT A SIMILAR PROGRAM. I WAS GLAD TO BE A PART OF A PROJECT THAT I FEEL WILL BE VERY BENEFICIAL TO BOTH THE COMPANY AND THE COMMUNITY.

OCT-15-98 THU 11:36 AM NICO PLATING

FAX NO. 812 822 4580

P. 03

STAKEHOLDER STATEMENT OF SUBSTANTIAL CONSENSUS

The following stakeholder/s support the US Filter Recovery Services XL Project:

Name

Affiliation

Date _____

Name Danny L. Conklin Nico Products, Inc 10-15-98

COMMENTS:

The following stakeholder/s support the US Filter Recovery Services XL Project:

Date _____

Robert Lundquist Mr. TAP 10/14/98

COMMENTS:

COMMENTS: