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To:  
robert\_elam@ameri  
canchemistry.com  
cc:  
Subject: Current  
Practices re: comp  
fuels storage &  
transportation

Bob,

When we last spoke to you on the phone about the comp fuels project, you indicated to us that requiring full HW controls for storage and tracking of offsite shipments of the comp fuels would be a "dealbreaker" because it would require the offsite facility to have a RCRA TSD permit in order to receive the comp fuels. We are currently investigating options for storage and tracking requirements and it would be very helpful for us to know what the current practices are in the industry.

Can you provide information re on-site and burner storage practices for comp fuel--e.g., do most folks comply with the 90-day HW storage tank requirements or the substantive SPCC requirements simply as a matter of practice to manage the fuel responsibly? Re tracking of shipments, do comp fuel generators use any type of tracking system to be sure the comp fuel gets to their burner, either for affiliated or nonaffiliated burners?

We would need any information you can provide by May 1st in order to meet our project deadlines.

thank you very much for your assistance,  
Mary

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