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## Challenge to RCRA Part B Permit Renewal Provisions: East Hanover, New Jersey, TSD Files U.S. EPA Environmental Appeals Board Petition

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ERM filed an August 13th Petition for Review ("Petition") before the United States Environmental Protection Agency ("EPA") Environmental Appeals Board ("EAB") on behalf of Novartis Pharmaceuticals Corporation ("Novartis") requesting revisions to a Resource Conservation and Recovery Act ("RCRA") Part B renewal.

The Petition addresses a Novartis East Hanover, New Jersey, TSD ("Facility").

The Petition states that an HSWA Permit Renewal was issued on July 15, 2020, by EPA for the Facility.

ERM states that during review of the Responsiveness Summary and HSWA permit and associated attachments, it:

. . . identified the following items and based on the related comments, respectfully requests the HSWA Permit be modified to address those comments.

Issues addressed in the Petition include:

- Source of 1,1,1-trichloroethane
- Clarification of building number
- Clarification of number of groundwater monitoring wells
- Reporting requirement for 1,4-dioxane be changed to biennially
- Noting that language should be added to state that whenever onsite potable wells are closed and the site goes to a 100% public water supply that 1,4-dioxane testing will no longer be required.

A copy of the Petition can be downloaded [here](#).