TSD File Inventory Index

Date: June 6, 2000

Initial: C M Henevad

Facility Name: Hoge Lumber Company (One Folder Site)			
Facility Identification Number: OHD 005 045 729			
A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	X	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	X
.3 Part A Application and Amendments	X	**C.2 Compliance/Enforcement**	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc	X	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		**D.5 Corrective Action/Enforcement**	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		**E. Boilers and Industrial Furnaces (BIF)**	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		**F.1 Imagery/Special Studies** (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		**G.1 Risk Assessment**	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not qualify for individual folder per schedule

A.2 Part A/
Interim Status

A.2 Part A/
Interim Status

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

March 30, 1993

RECEIVED
WMD RCRA
RECORD CENTER
APR 08 1993

Hoge Lumber Co.
Attn: Joe Niekamp
P.O. Box 159
New Knoxville, OH 45871-0159

RE: EPA ID#: *OHD005045729*

LOCATION of INSTALLATION: *700 S Main St*
New Knoxville, OH 45871

In response to your request of February 1993 the following information has been updated:

Contact: Joe Niekamp

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V
Ohio EPA District Office

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Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88. GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

6505

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

For Official Use Only

Comments: N

MAY 16 1990 COPY

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)
OHD005045729 (T/A C 1)	A	900511

I. Name of Installation

HOGE LUMBER Co.

II. Installation Mailing Address

Street or P.O. Box: SOUTH MAIN STREET

City or Town: NEW KNOXVILLE — State: OH — ZIP Code: 45871

III. Location of Installation

Street or Route Number: SOUTH MAIN STREET

City or Town: NEW KNOXVILLE — State: OH — ZIP Code: 45871

IV. Installation Contact

Name and Title *(last, first, and job title)*: FRONING CLARK PERS

Phone Number *(area code and number)*: 419 753 2263

V. Ownership

A. Name of Installation's Legal Owner: HOGE LUMBER COMPANY

B. Type of Ownership *(enter code)*: P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [X] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

RECEIVED MAY 11 1990 U.S. EPA, REGION V SWB — PMS

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es))*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)* OIL - AUGLAIZE

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [X] A. First Notification
- [ ] B. Subsequent Notification *(complete item C)*

5/14/90 DB

C. Installation's EPA ID Number:

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete.

Continue on reverse

ID — For Official Use Only			
C		T/A	C
W			1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F003					
7	**8**	**9**	**10**	**11**	**12**

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

☐ 1. Ignitable *(D001)* ☐ 2. Corrosive *(D002)* ☐ 3. Reactive *(D003)* ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Clark T. Froning	CLARK T. FRONING PERSONNEL MGR.	5-8-90

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

MAY 17 1990

Dear Notifier:

Enclosed you will find the U.S. Environmental Protection Agency (U.S. EPA) Identification (ID) number that has been assigned to your installation. This ID number must appear on all manifest forms when transporting hazardous waste. You will find your ID number on the second line of the copy of the enclosed notification form. This letter confirms that you have filed a Notification of Hazardous Waste Activity (form 8700-12) to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). This letter and the enclosed copy of the notification form should be retained for future use.

If your facility is in the state of Michigan and you were previously issued an ID number with an MIG prefix, do not use the MIG number. This is a state number. Be sure to use the MID number only.

If you have any further questions regarding hazardous waste activity, please contact the Region V Solid Waste Hotline at (312) 886-4001.

Sincerely yours,

Arthur S. Kawatachi
Information Section
Office of RCRA

Enclosure

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

6505

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

For Official Use Only

Comments: N

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)
OHD005045729 (T/A C: 1)	A	900511

I. Name of Installation

HOGE LUMBER Co.

II. Installation Mailing Address

Street or P.O. Box: SOUTH MAIN STREET

City or Town	State	ZIP Code
NEW KNOXVILLE	OH	45871

III. Location of Installation

Street or Route Number: SOUTH MAIN STREET

City or Town	State	ZIP Code
NEW KNOXVILLE	OH	45871

IV. Installation Contact

Name and Title *(last, first, and job title)*	Phone Number *(area code and number)*
FRONING CLARK PERS	419 753 2263

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership *(enter code)*
HOGE LUMBER COMPANY	P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [X] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

RECEIVED MAY 11 1990 U.S. EPA REGION 5 SWB — PMS

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [X] A. First Notification
- [ ] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number:

ID — For Official Use Only			
C		T/A	C
W			1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F003					
7	**8**	**9**	**10**	**11**	**12**

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49	50	51	52	53	54

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☐ 1. Ignitable *(D001)* ☐ 2. Corrosive *(D002)* ☐ 3. Reactive *(D003)* ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Mark T. Froning	CLARK T. FRONING PERSONNEL MGR.	5-8-90

B.373

S. Kiddon file

OHD005045729

NON-NOTIFICATION DISPOSITION FORM

1. Name of Installation: HOGE LUMBER COMPANY

Installation Mailing Address: 700 S. MAIN STR.

NEW KNOXVILLE — City or Town
OH — State
45871 — Zip Code

2. Location of Installation: HOGE LUMBER Co.
700 S. MAIN. (St. Rt. 29)

New Knoxville — City or Town
OH — State
45871 — Zip Code

3. Installation Contact: CLARK FRONING. — Name and Title

Phone No.: (419) - 753-2263 — Area Code and Number

4. If determined, check the type(s) of hazardous waste activity:

[✓] Generation
[ ] Transportation
[✓] Treat/Store/Dispose
[ ] Underground Injection

Rec'd NOTIF
5-11-90

RECEIVED
MAY 8 - 1990
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

A.4 Closure/ Post-Closure

A.4 Closure/ Post-Closure

OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

Re: ***CLOSURE PLAN***
Hoge Lumber Company
OHD 005 045 729

October 28, 1996

Mr. Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

Dear Mr. Froning:

On March 11, 1996, Ohio EPA received from Hoge Lumber Company a closure plan for the burn pit area where hazardous wastes were burned with everyday refuse and the hazardous waste storage area where drums of paint solvents were stored prior to disposal located at 700 South Main Street, New Knoxville, Ohio. On May 28, 1996, Ohio EPA issued Hoge lumber a Notice of Deficiency. On August 14, 1996, Ohio EPA received from Hoge Lumber Company a revised closure plan.

The closure plan was submitted pursuant to Rule(s) 3745-66-12 (and 3745-66-18) of the Ohio Administrative Code (OAC) in order to demonstrate that Hoge Lumber's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12 (3745-66-11, 3745-66-12, and 3745-66-18).

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rule(s) 3745-66-12 (and OAC 3745-66-18). The public comment period extended from March 27, 1996 through April 24, 1996. No public comments were received by Ohio EPA.

Based upon review of Hoge Lumber's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at 700 South Main Street, New Knoxville, Ohio, as modified herein, meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule(s) 3745-66-12 (and 36745-66-18).

The closure plan submitted to Ohio EPA on March 11, 1996 and revised on August 14, 1996 by Hoge Lumber is hereby approved with the following modification(s):

OHIO E.P.A.
OCT 28 96
ENTERED DIRECTOR'S JOURNAL

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

by: Kara Yoder Date 10/28/96

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

Printed on Recycled Paper

Section 3.0 Hazardous Waste List and Maximum Extent of Operations

1. Hoge shall modify Table 1 of the closure plan to include ethyl benzene, isobutanol, and correct the spelling of isopropanol.

Section 5.3 Decontamination and removal of Waste Residue

2. Hoge shall modify the closure plan to include decommissioning procedures for the decontamination area.

Section 5.4 Health and Safety

3. Hoge shall modify the closure plan to include personnel decontamination procedures and methods used during closure activities.

Please be advised that approval of this closure plan does not release Hoge Lumber from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

Strict compliance with each and every provision of this approved closure plan, especially including the modifications specified herein, is expected. The Ohio EPA will monitor such compliance. The Director expressly reserves the right to take action, pursuant to Chapters 3734 and 6111 of the Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved closure plan.

OHIO E.P.A.

OCT 28 96

ENTERED DIRECTOR'S JOURNAL

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer licensed to practice in the State of Ohio, that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: *Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049.*

Sincerely,

Donald R. Schregardus
Director

hoge-awa/closures/DH.ao

pc: Tom Crepeau, DHWM Central File, Ohio EPA
Montee Suleiman, DHWM, Ohio EPA
Harriet Croke, USEPA - Region V
Colleen Weaver, NWDO, Ohio EPA

OHIO E.P.A.

OCT 28 96

ENTERED DIRECTOR'S JOURNAL

OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

NOTICE OF DEFICIENCY

CERTIFIED MAIL

Re: ***CLOSURE PLAN***
Hoge Lumber Company
OHD 005 045 729

June 21, 1996

Mr. Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

Dear Mr. Froning:

On March 11, 1996, Ohio EPA received from Hoge Lumber Company a closure plan for the burn pit area where hazardous wastes were burned with everyday refuse and the hazardous waste storage area where drums of paint solvents were stored prior to disposal located at 700 South Main Street, New Knoxville, Ohio.

This closure was submitted pursuant to Rule(s) 3745-66-12 (and 3745-66-18) of the Ohio Administrative Code (OAC) in order to demonstrate that the Hoge Lumber Company proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12 (3745-66-11, 3745-66-12, and 3745-66-18).

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rule(s) 3745-66-12 (and OAC 3745-66-18). The public comment period extended from March 27, 1996 through April 24, 1996. No public comments were received by Ohio EPA.

Pursuant to OAC Rule(s) 3745-66-12(D)(4) (and 3745-66-18(F)), I am providing you with a statement of deficiencies in the plan, outlined in Attachment A.

Please take notice that OAC Rule(s) 3745-66-12 (and 3745-66-18) require(s) that a modified closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter.

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

The modified closure plan shall be prepared in accordance with the following editorial protocol or convention:

1. Old Language is over-struck, but not obliterated.

2. New Language is capitalized.

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049. A copy should also be sent to: Colleen Weaver, Ohio EPA, NWDO District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Upon review of the resubmitted plan, I will prepare and issue a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Colleen Weaver at (419) 352-8461.

Sincerely,

Donald R. Schregardus
Director

DRS/mlb/dlh

Enclosure

pc: Tom Crepeau, DHWM, Central File, Ohio EPA
Harriet Croke, USEPA, Region V
Montee Suleiman, CO, Ohio EPA
Colleen Weaver, Ohio EPA, NWDO

ATTACHMENT A

Hoge Lumber Company
OHD 005 045 729

1. **Section 1.0** Hoge Lumber Co. (Hoge) shall revise the closure plan to include a more detailed description of the events leading up to the generation of hazardous waste (e.g. prior owners and operations, property transaction, current operations, etc.).

   The facility description must include references to any environmental permits held by the facility (e.g. NPDES, air permits, etc.) along with corresponding permit identification numbers.

2. **Section 2.1** The text in this section indicates that "a stream lies along the east property line." However, the figures detailing the facility do not show a stream along the eastern property line but do include an "open ditch" along the western property line. Hoge shall revise the closure plan to correct this discrepancy between the text and the figures. Hoge shall also revise the figures in the closure plan to clearly indicate what each line type represents (e.g., property line, building wall, etc...).

3. **Section 3.0** Table 1 of the closure plan lists toluene and xylene as the only constituents of concern for both closure areas. However, the uniform waste manifests and the prequalification evaluation material analysis located in the appendix of the closure plan indicate that acetone, n-butyl alcohol, ethyl benzene, isobutanol, MEK and MIBK are hazardous constituents associated with the waste stream and should also be included as constituents of concern. Hoge shall revise the closure plan to include all the hazardous constituents associated with the waste stream and the F003 and F005 waste codes.

4. **Section 4.0** Hoge states in the plan that the remediation standard for volatile organic compounds (VOC's) will be based on the Lowest Achievable Level for toluene and xylene. The remediation standard for VOC's must be changed to the lowest possible analytical detection limit where it is referenced in the closure report.

5. **Section 4.3** The closure plan must more thoroughly describe the soil sampling and analysis methods and procedures including:

   (a) actual SW-846 analytical method used by the laboratory for each constituent;

   (b) field sampling methods; and

   (c) sample type (grab or composite).

   The closure plan states that samples will be screened until no VOC's are detected by the photoionization detector. The closure plan must be revised to include the following statement: Field instruments are not acceptable substitutes for SW-846 methods; they will be used to suggest the presence, but not the absence, of hazardous constituents.

The closure plan should contain a clear statement indicating that sampling will continue until the full vertical and horizontal extent of soil contamination is adequately defined. In addition, the closure plan should contain a clear statement indicating that sampling will continue until the full vertical and horizontal extent of ground water contamination is adequately defined.

The closure plan states that duplicates will be collected by splitting field samples. The closure plan must be revised to include the following statement: Field duplicates will be prepared by collecting two simultaneous samples into separate containers using separate sampling tools or tools decontaminated between sample collection.

6. **Section 5.2** Hoge shall revise the closure plan to include that all roll off boxes used for contaminated soil transport must be lined with plastic sheeting.

7. **Section 5.3** The description of the decontamination area should also include decommissioning procedures. The closure plan states that decontamination of reusable equipment will consist of removal of loose materials by scraping or brushing (dry decon) and followed by final decontamination at the final decon area. The closure plan must be revised to include the following statement: The decontamination of reusable equipment will be accomplished by brushing or scraping debris from the exposed surfaces followed by at least three separate rinses.

   The closure plan states that trucks used to transport wastes will initially be decontaminated at each staging and loading area as shown on figure 7. Vehicles and equipment which have entered that hot or warm zone will also be decontaminated at the decon pad. The closure plan must be revised to include the following statement: Equipment decontamination operation will be managed so that vehicles do not distribute contaminated debris outside of the waste management area.

   The closure plan must specify an estimate of the volume of waste material which will be generated by decontamination efforts.

8. **Section 5.4** In addition to obvious measures needed to protect the health of nearby residents, the owner/operator should clearly show that measures will be taken to protect all personnel (including contractors, Ohio EPA inspectors, and visitors) involved in the closure or those possibly exposed to hazardous waste by the closure activity. The closure plan should include:

   (a) The name and telephone number of emergency coordinator(s) and local emergency officials to be notified in case of emergency during closure;

   (b) A delineation of the work zones to be used in the closure and decontamination areas (i.e. exclusion, contamination, reduction, and support zones); and

   (c) Personnel decontamination procedures and methods, and proper disposal or decontamination of equipment used during closure activities.

9. **Section 7.0** The closure plan must specify that the closure certification report will be submitted within 60 days of completion of closure.

10. **Section 7.0 and 4.1.1** Hoge shall revise the closure plan to detail which specific activities are considered "critical" and thus observed by the registered Professional Engineer. Hoge shall also revise the closure plan to include that the NWDO will be notified at least five business days in advance of any critical closure activities.

/dlh

OhioEPA
State of Ohio Environmental Protection Agency

EET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

March 20, 1996

Re: Receipt of Closure Plan
U.S. EPA I.D. No.
OHD005045729

A.4.

Mr. Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

Dear Mr. Froning:

With this letter the Ohio EPA acknowledges receipt of the hazardous waste full closure plan submitted by Swank Consulting for Hoge Lumber Company, 700 S. Main Street, New Knoxville, Ohio 45871. The closure plan concerns the former hazardous waste storage area and the hazardous waste burn pit area located at the site. A public notice concerning receipt of this plan will appear the week of March 25, 1996 in the legal notice section of the Wapakoneta Daily News. The Director of Ohio EPA will act upon the plan after the close of the public comment period on April 29, 1996.

A copy of the closure plan will be available for public review at the Auglaize County District Public Library, Community Branch, 304 S. Main, New Knoxville, Ohio 45871, and at Ohio EPA, Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402, tel: (419) 352-8461.

Please contact Colleen Weaver of the Northwest District Office if you have any questions on this matter.

Sincerely,

Vanessa Gregory

Vanessa Gregory, Management Analyst
Data Management Section
Division of Hazardous Waste Management

cc: Harriet Croke, U.S. EPA, Region 5
Montee Suleiman, DHWM
Colleen Weaver, NWDO

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

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PUBLIC NOTICE

AUGLAIZE COUNTY

NOTICE OF RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

Notice is hereby given of the receipt on March 12, 1996 of a hazardous waste full closure plan from Hoge Lumber Company, 700 S. Main Street, New Knoxville, Ohio 45871, U.S. EPA I.D. No. OHD005045729. The plan concerns a former hazardous waste storage area and a hazardous waste burn pit area located at the same address. Notice is given pursuant to Rule 3745-66-10 through 17 of the Ohio Administrative Code and 40 CFR, Subpart G, 265.110 through 117. The Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous & Solid Waste Amendments of 1984, which concern any possible uncorrected releases of hazardous waste or hazardous waste constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

A copy of the facility's closure plan will be available for public review at the Auglaize County District Public Library, Community Branch, 304 S. Main, New Knoxville, Ohio 45871, and at Ohio EPA, Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402, tel: (419) 352-8461. Comments concerning this plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action may be submitted within 30 days of this notice to the Ohio EPA, Division of Hazardous Waste Management, Attn: Data Management Section, P.O. Box 1049, 1800 Watermark Dr., Columbus, Ohio 43216-1049, tel: (614) 644-2977.

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

TRACKING - DHWM, CM&ES
TO GO ON: X RCRIS __ FO LOG __ USEPA LOG __ CJ LOG __ FILE
ENTERED: __ RCRIS __ FO LOG __ USEPA LOG __ CJ LOG ONLY
RCRIS ENTRY CODES: (EVALULATION) 009 (ENFORCEMENT) 013
CEI __ CI __ OTHER ___ INITIAL NOV __ FOLLOW-UP NOV __
FULL RTC __ PARTIAL RTC __ LDR __ SENT TO USEPA: YES__ NO__

Donald R. Schregardus
Director

October 18, 1993

Re: Hoge Lumber Company
OHD005045729
Financial Assurance

RECEIVED
WMD RCRA JAN 25 1994
RECORD CENTER

Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

Dear Mr. Froning:

Ohio EPA conducted financial record reviews May 7, 1990, July 8, 1991, September 26, 1991, November 13, 1991 and has found the Hoge Lumber Company in continued violation of Ohio Administrative Code (OAC) rules 3745-66-42, 3745-66-43 and 3745-66-47. On January 27, 1992, I received a letter from you in response to the November 13, 1991 financial record review Notice of Violation letter. You indicated in this correspondence that you did not fully understand the financial assurance rules and that your attorney John Gartland of the firm Arthur & Hadden would be in touch with me.

On October 12, 1993, Ohio EPA conducted an annual review of Hoge Lumber Company's financial assurance documentation. To date, Hoge Lumber Company has not submitted documentation demonstrating compliance with financial assurance requirements. Therefore, the facility remains in violation of OAC rules 3745-66-42, 3745-66-43 and 3745-66-47. It is noted that negotiations are continuing between the Attorney General's Office and Hoge Lumber Company's Counsel.

Please submit documentation demonstrating compliance with OAC rules 3745-66-42, 3745-66-43 and 3745-66-47 within thirty (30) days of receipt of this letter. If you have any questions, I may be reached at (614)644-2934.

Sincerely,

Tina Jennings

Tina Jennings
Compliance Monitoring and Enforcement Section
Division of Hazardous Waste Management

wp.TJ.lcn.hoge

cc: Laurie Stevenson/John Schierberl, CM&ES, DHWM
Mark Navarre, Legal
Maryann Seghy, DHWM, NWDO
Todd Musheff/Mike Morous/Susan Ashbrook, AGO/EES

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~~FAD~~
LDF
RCRIS

OhioEPA

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

CERTIFIED MAIL

October 2, 1991

Re: Hoge Lumber Company
OHD005045729

RECEIVED
OCT 21 1991
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, OH 45871

Dear Mr. Froning:

On September 26, 1991 Ohio EPA conducted a review of the financial assurance and liability coverage documentation on file at the Ohio EPA for the Hoge Lumber Company's New Knoxville, Ohio facility referenced above. Ohio EPA evaluated the facility for compliance with the closure/post-closure cost estimate, closure/post-closure financial assurance, and liability coverage requirements as set forth in Ohio Administrative Code (OAC) rules 3745-66-42 through 3745-66-47.

To date, financial assurance and liability coverage have not been established for the facility, in violation of OAC rules 3745-66-42 through 3745-66-47.

These and other violations of Ohio's hazardous waste laws and regulations are currently being addressed at the Office of the Attorney General. If you have any questions, I may be reached at (614) 644-2934.

Sincerely,

Carolyn Reierson

Carolyn Reierson
Hazardous Waste Enforcement Section
Division of Hazardous Waste Management

Sp.CR.lcn

cc: Laurie Stevenson, HWES, DSHWM
Maryann Seghy, DSHWM, NWDO
Pamela Allen, Manager, HWES, DSHWM
Susan Ashbrook, AAG/EES, Office of the Attorney General
Chris Korleski, AAG/EES, Office of the Attorney General

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OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

RECEIVED
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JUL 19 1994

M E M O R A N D U M

To: Financial Assurance File - Hoge Lumber Company, OHD005045729

From: Carolyn Reierson through Laurie Stevenson, HWES, DSHWM

Subject: July 8, 1991 Financial Record Review - Hoge Lumber Company, OHD005045729

Date: July 9, 1991

<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<<

On July 8, 1991 Ohio EPA conducted a review of the financial assurance and liability coverage documentation on file for the Hoge Lumber Company facility referenced above. The facility was evaluated for compliance with OAC rules 3745-66-42 through 3745-66-47. To date, financial assurance and liability coverage has not been established or maintained for the facility, in violation of these rules. The Hoge Lumber Company has been previously notified of these violations via letter dated September 28, 1990 as a result of a financial record review.

These and other violations are currently being addressed at the Office of the Attorney General. The criminal portion of the case has not yet been resolved. Therefore, no notice of violation will be sent to the facility at this time.

sp.CR.LS.lcn

cc: Pamela Allen, Manager, HWES, DSHWM

Printed on recycled paper

If you have any questions, I may be reached at (614)644-2934.

Sincerely,

Tina Jennings

Tina Jennings
Hazardous Waste Enforcement Unit
Division of Solid and Hazardous Waste Management

Sp.TJ.lcn
Attachments

cc: Laurie Stevenson, HWES,DSHWM
Jeff Steers, DSHWM, SEDO

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020 **Fax** (614) 644-2329

Richard F. Celeste
Governor

Hard Copy

CERTIFIED MAIL

RE: Hoge Lumber Company
OHD 005 045 729
Auglaize County

September 28, 1990

Mr. Clark Froning
Hoge Lumber Company
700 S. Main Street
New Knoxville, Ohio 45871

Dear Mr. Froning:

As a result of a May 7, 1990 inspection conducted by Ohio EPA, the Hoge Lumber Company has been found to be operating as a hazardous waste facility as defined in Ohio Administrative Code (OAC) rule 3745-50-10(A)(32). Consequently, the Hoge Lumber Company is subject to Ohio's financial assurance rules concerning closure cost estimates, financial assurance for closure, and liability coverage for sudden accidental occurrences as specified in OAC rules 3745-66-42, 3745-66-43, and 3745-66-47.

I have reviewed the Agency's files concerning the Hoge Lumber Company and find that no documentation demonstrating compliance with the financial assurance requirements currently applicable to the Hoge Lumber Company has been provided to Ohio EPA. Therefore, the Hoge Lumber Company is in violation of OAC rules 3745-66-42, 3745-66-43, and 3745-66-47.

It is also noted that in the event that clean closure of the facility's waste pile cannot be achieved, the Hoge Lumber Company may also be subject to the post-closure financial assurance rules as specified in OAC rules 3745-66-44 and 3745-66-45 The applicability of the post-closure financial assurance requirements to this facility will be determined upon the completion of closure.

Please submit documentation demonstrating compliance with OAC rules 3745-66-42, 3745-66-43, and 3745-66-47 within thirty (30) days of receipt of this letter. If you have any questions, I may be reached at (614) 644-2944.

Sincerely

Carolyn J. Reierson

Carolyn J. Reierson
RCRA Enforcement Section
Division of Solid and Hazardous Waste Management

cc: **Michael Savage**, Assistant Chief, DSHWM
Themton Toorkey, DSHWM, NWDO
Pamela Allen, RES, DSHWM
Mark Navarre, Legal Section
Mike Marous, Office of the Attorney General

2134U

C.2 Compliance/ Enforcement

C.2 Compliance/ Enforcement

OhioEPA
State of Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
P.O. Box 466
Bowling Green, Ohio 43402-0466
(419) 352-8461 FAX (419) 352-8468

TRACKING - DHWM, CM&ES
TO GO ON: ✓ RCRIS __ FO LOG __ USEPA LOG __ CJ LOG __ FILE
ENTERED: ✓ RCRIS __ FO LOG __ USEPA LOG __ CJ LOG ONLY
RCRIS ENTRY CODES: (EVALULATION) 008 (ENFORCEMENT) 012
CEI ✓ CI __ OTHER _____ INITIAL NOV __ FOLLOW-UP NOV __
FULL RTC __ PARTIAL RTC __ LDR __ SENT TO USEPA: YES__ NO__

George V. Voinovich
Governor

Re: Notice of Violation
OHD 005 045 729
Hazardous Waste
Auglaize County

June 25, 1993

RECEIVED SEP 10 1993
WMD RCRA
RECORD CENTER Compliance

CERTIFIED MAIL

Mr. Clark Froning
Mr. Joe Niekamp
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

RECEIVED
OHIO EPA
JUN 29 1993
DIV. OF HAZARDOUS WASTE MGT.

Dear Mr. Froning and Mr. Niekamp:

On May 25, 1993, the Ohio Environmental Protection Agency (Ohio EPA) conducted a hazardous waste compliance evaluation inspection of Hoge Lumber Company located in New Knoxville, Ohio. This inspection was conducted in order to determine Hoge's compliance with Ohio's generator and treatment, storage and disposal regulations as adopted under Chapter 3745 of the Ohio Administrative Code (OAC). Hoge was represented by John Hoge, Clark Froning, and Joe Niekamp. The Ohio EPA was represented by Maryann Alford, Jarad Swint, and myself. The Agency's inspection included a tour of your facility and a review of written documentation. Hoge produces cut lumber, cabinetry, flooring and other lumber products. Hazardous wastes currently generated at this site include D001/F005 spent solvents, D001/F003 paint related waste, and D001/D039 waste petroleum naphtha. In the past, prior to the off-site management of hazardous wastes, the company treated and disposed of D001/F003/F005 solvent waste and disposed of F003/F005 quenching water waste.

During the inspection, the following violations of Ohio's hazardous waste rules were observed and noted.

1. **Ohio Revised Code (ORC) 3745-02(F)** states in part that "No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated or disposed of ...except at or to any of the following: (1) A hazardous waste facility operating under a permit in accordance with this chapter...". Hoge Lumber Company has treated and disposed of hazardous waste without a permit. Specifically, waste paint and solvents (D001/F003/F005)were mixed and burned behind the facility, spent solvents (D001/F003/F005) were disposed of outside the cabinet shop door, and quenching water (F003/F005) was discharged to the ground from a pipe through the outside wall.

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The Ohio Environmental Protection Agency (Ohio EPA) understands that Hoge is no longer treating or disposing of hazardous waste, however, this violation cannot be corrected until the closure of all hazardous waste storage units has been certified.

2. **OAC Rule 3745-50-40(B)** Hoge has not submitted a completed application for a hazardous waste treatment and disposal permit prior to constructing the treatment and disposal units.

The Ohio EPA understands that Hoge is no longer treating or disposing of hazardous waste, however, this violation cannot be corrected until the closure of all hazardous waste management units has been certified.

3. **OAC Rule 3745-52-20(A)** Hoge did not have a manifest accompany all hazardous wastes shipped off-site. The July and August manifests for the D001/D039 waste stream that Safety Kleen transports were not available at the facility for review. However, a receipt from Safety Kleen was available verifying the shipment off-site to a permitted facility.

In a fax received on May 28, 1993, Hoge submitted information on the wastes that were sent off-site with no manifests.

4. **OAC Rule 3745-65-13(A)(1)** Hoge does not have a sufficiently detailed Chemical and Physical Analysis of the waste material containing all of the information which must be known to treat, store, or dispose of hazardous waste.

Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the treatment and disposal areas will be adequate, in part, to address this violation.

5. **OAC Rule 3745-65-13(B)(1)-(6)** Hoge's waste analysis plan is incomplete and does not thoroughly describe the analytical parameters, test methods, sampling methods, testing frequency, and responses to any changes that may affect the character of the waste.

The written waste analysis plan shall include, but not be limited to: (a) parameters for analysis and the rationale for the selection of these parameters, (b) sampling methods, (c) test methods, and (d) frequency of analysis.

Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate in part to address these violations.

6. **OAC Rule 3745-65-14(B)(2)(a)(b)** Hoge does not maintain an artificial or natural barrier, which completely surrounds the active portions of the facility, and a means to control entry at all times through the gates or other entrances to the active portion of the facility.

Although all solvent wastes currently being stored on-site are kept in a locked shed and cabinet, the facility does not have a fence around the area where unpermitted burning and dumping took place.

Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

7. **OAC Rule 3745-65-73** Hoge has not maintained a written operating record at the treatment-storage-disposal facilities. Such a record must include, but not be limited to, the following: (a) a description and quantity of each hazardous waste and the method and date of its treatment, storage, or disposal within the facility; (b) the location of all hazardous waste at the facility and the quantity at each location; (c) the common name, EPA hazardous waste code, and physical state of the waste; (d) records of waste analysis; (e) records of incidents that require implementation of the contingency plan; (f) records and results of inspections; and, (g) all closure cost estimates.

Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

8. **OAC Rule 3745-65-75** Hoge has not submitted an annual Treatment, Storage, or Disposal Facility Operating Report to the Director of the Ohio EPA by March 1 of 1991.

Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

9. **OAC Rule 3745-65-75** Hoge does not have a written closure plan for the facility which identifies the steps necessary to perform final closure of the facility. Closure plans must be maintained on-site for each area of hazardous treatment, storage, or disposal. The closure plan must contain the following elements:

   A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11;

   A description of how final closure will meet the requirements of 3745-66-11;

   An estimate of the maximum amount of hazardous waste ever in inventory;

   A description of the steps to be taken to decontaminate facility equipment, containment system structures, soils, and all hazardous waste residues;

   The year closure is expected to begin, and schedule for the various phases of closure;

   A description of other activities necessary to ensure closure with closure with the performance standards including ground water monitoring, leachate collection, and run-on/run-off control.

   In a May 29, 1992, letter to the Ohio EPA, Hoge stated that the closure plan has been written and is in the possession of their attorney. This closure plan must be submitted immediately to the Ohio EPA for each hazardous waste treatment, storage, or disposal area.

10. **OAC Rule 3745-67-56** Hoge has placed ignitable solvent waste on a solid waste pile without protecting it from conditions which may cause ignition.

    Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

The following Land Disposal Restriction violations were also noted during the inspection:

11. **OAC Rule 3745-59-07** For treated solvent wastes with treatment standards expressed as concentrations in the waste extract in OAC Rule 3745-59-41, Hoge has not tested the treatment residues or extract meet the applicable treatment standards.

Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

12. **OAC Rule 3745-59-40 (A)(C)** Hoge did not prohibit the disposal of restricted F003/F005 spent solvent wastes or treatment residues which exceed the concentration based treatment standards of OAC 3745-59-41.

    Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

Violations 1&2, and 4-12, were cited during an inspection conducted by Beth Ames on May 5, 1992. These violations will remain outstanding until certification of closure is complete.

Please respond, in writing, to this Notice of Violation (NOV) within ten days. Your response must include all actions and timetables necessary to demonstrate compliance.

Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the completed inspection form is enclosed for your review. Please contact me at (419) 352-8461 if you have any questions.

Sincerely,

Colleen M. Weaver

Colleen M. Weaver
Division of Hazardous
Waste Management

/rab

Enclosure

pc: John Schierberl, DHWM, CO
Laurie Stevenson, DHWM, CO
Susan Ashbrook, AGO
Todd Musheff, AGO
Cindy Lohrbach, DHWM, NWDO
NWDO File

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: Hoge Lumber

USEPA I.D.: OHD 005 045 729 HWFB No.: _____

Street: 700 S. Main St.

City: New Knoxville State: Oh Zip: 45871

County: Auglaize Telphone: (419) 753-2263

Fax No: _____ PUCO No.: _____

Owner/Operator: _____

Street: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Fax: _____

Inspection Date: 5 / 25 / 93 Time: 9:45 - 11:30

Advance notice of inspection given? (yes) _____ (no) X
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspectors:	Colleen Weaver	OEPA/ES2	419-352-8461
	Maryann Alford	OEPA/ES2	"
	Jarad Swint	OEPA/Intern	"
Facility Representative:	Clark Froning	Personnel	(419) 753-2263
	Joe Niekamp	Haz Mat Tech	"

STATUS

Cond. Ex. SQG___ SQG X Large Quantity Generator___
Treatment X Storage___ Disposal X Transporter___

Part A Permit: (yes) _____ (no) X Part B Permit: (yes) _____ (no) X
LDR Checklist Attached: (yes) X (no) _____

ACTIVITIES

Containers X
Tanks___
Wastepile X
Landfill___
Surface Impoundment___

Used oil burner___
Hazardous waste fuel burner/blender___
Incineration/Thermal treatment X
Land treatment___
Groundwater monitoring___

Revised: (5/29/92)
FINAL

REMARKS - GENERAL INFORMATION

Include a list of wastes being managed at the site and a brief description of site activity and waste handling procedures:

Hoge Lumber's processes include cutting lumber and building wood cabinetry, floors, etc. Hazardous waste is generated from painting and varnishing processes. These wastes include D001/F005 spent solvent, D001/F003 misc. paint related waste, D001/D039 Parts washer waste, and F003/F005 quenching water.

In the past, Hoge has disposed of solvents to the ground in the burn pile area and outside of the cabinet shop door. Quenching water was also disposed of to the ground outside of the varnish area via a pipe through the wall. Solvents were burned on a burn pile of solid waste. . .

The facility is currently under enforcement with the Ohio Attorney General's Office for these past activities.

FACILITY INSPECTION
WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE			ON SITE MANAGEMENT											OFF SITE MANAGEMENT
EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR			TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLED	CONTAINER	IMPOUNDMENT	TANK	WASTE PILE	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT
			LESS THAN 90 DAYS	LESS THAN 180 DAYS	LESS THAN 270 DAYS									
F005 D001		Cabinet Shop Solvent and cleanup.	X			*						*		Incinerated by Safety Kleen
F003 D001	1 drum/yr.	Cabinet Shop Solids	X			*						*		Incinerated by Safety Kleen
D001 D039	1-2 33gal drum/Mo.	Parts washer waste (Petroleum Naptha)	X					X	X					Recycled by Safety Kleen

* Past Mgmt practices - this waste was also disposed to the ground.

PERMIT STATUS

GENERAL REQUIREMENTS	Y/N/NA	RMK #
1. Has the owner/operator submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	N	
When was the owner/operator's Part A submitted: _____		
2. Is the owner/operator operating in compliance with the terms and conditions of its HWFB permit?	NA	
If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?	NA	
If yes, what date was the PCR submitted? _____		
3. Has the owner/operator submitted a Part B?	NA	
PERMIT BY RULE REQUIREMENTS		
4. Has there been a rule or statute change which has caused the owner/operator to become subject to Ohio's hazardous waste facility permitting requirements?	N	
a. If so, please describe the rule change below:		
b. What was the effective date of the rule or statute change in Ohio?		
c. Did the owner/operator submit a Part A to the Director in accordance with the requirements of OAC rule 3745-50-40(C)(D)?	NA	

NOTE: In accordance with 3745-50-40(D), owners/operators are required to submit the Part A within 30 days after the date they first become subject to Ohio's TSD facility standards. Small quantity generators who treat, store or dispose of wastes were required to submit a Part A by the effective date OAC Rule 3745-50-40. [See OAC Rule 3745-50-40]

d. Did the owner/operator notify the US EPA of its hazardous waste activity? [3745-50-40(C)(1)(a)]	Y	
i. What was the date of notification? _____		

SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)	Y/N/NA	RMK #
1. Have the wastes generated at the facility been evaluated as required under 3745-52-11?	Y	
(a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)]	Y	

NOTE: The TC Rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, please specify those waste(s) which the SQG has failed to provide an adequate evaluation of:

GENERATOR CLASSIFICATION

2. Do quantities of hazardous waste accumulated on-site exceed 6000 kgs? (If so, TSD standards apply. Complete applicable TSD checklists.) [3745-52-34(D) and (F)]	N	

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

3. Has the generator obtained an identification number from either US EPA or Ohio EPA as required under 3745-52-12 prior to treating, storing, disposing, transporting or offering hazardous waste for transport?	Y	

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

4. Are waste streams generated at the facility being reclaimed under a contractual agreement as defined in OAC 3745-52-20(F)? D001 D039 Waste Stream	Y	2

If not, the generator is subject to manifest requirements of OAC 3745-52-20 through 3745-52-23. Please complete the <u>Manifest Requirements</u> checklist to document compliance with these requirements.

SQG - EMERGENCY PROCEDURES/PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)	Y/N/NA	RMK #
5. Is an emergency coordinator available at all times? [3745-52-34(D)(5)(a)]	Y	
6. Has the following information been posted by the telephone? [3745-52-34(D)(5)(b)]:		
a. Name and telephone number of emergency coordinator?	NA	1
b. Location of fire and spill control equipment?	NA	1
c. Telephone number of local fire department?	NA	1
7. Have emergencies been reported to the National Response Center? [3745-52-34(D)(5)(d)]	NA	
8. Are all employees thoroughly familiar with proper handling and emergency procedures? [3745-52-34(D)(5)(c)]	Y	

In addition to the above, the small quantity generator must comply with the "Preparedness and Prevention" requirements of OAC 3745-65-30 through 3745-65-37. Please complete the **Preparedness and Prevention** checklist to document compliance with these requirements.

SQG - ACCUMULATION OF HAZARDOUS WASTES (OAC 3745-52-34)		
9. Is the generator accumulating hazardous wastes in containers? If so,	Y	
a. Is the date accumulation began clearly marked on each container [3745-52-34(A)(2)]?	Y	
b. Is each container clearly marked with the words "Hazardous Waste" [3745-52-34(A)(3)]?	Y	

In addition to the above, if the generator is accumulating hazardous waste in containers, please complete the **Management of Containers** checklist. If the Small Quantity Generator is operating a satellite accumulation area, the **Satellite Accumulation Area Requirements** portion of the checklist must also be completed.

10. Is the generator accumulating hazardous wastes in tanks?	N	
a. If so, is each tank clearly marked with the words "Hazardous Waste" [3745-52-34(A)(3)]?	NA	

In addition to the above, if the generator is accumulating hazardous waste(s) in tanks, please complete the **Accumulation in Tanks for SQG's** checklist.

	Y/N/NA	RMK #
11. Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)]	N	
a. If so, has the generator been granted an extension by the Director for accumulation in excess of 180 (or 270) days?	NA	

REMARKS - SMALL QUANTITY GENERATOR REQUIREMENTS

1. Facility is operating under a contingency plan as a T,S,D.
2. The facility is responsible for manifests as they apply to TSDs, until certification of closure is complete

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

   (yes) _____ (no) _____

   If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the **Conditionally Exempt Small Quantity Generator Requirements** checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

   (yes) __X__ (no) _____

   If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

   (yes) _____ (no) _____

   or;

   b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

   (yes) _____ (no) _____

   If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

SATELLITE ACCUMULATION AREA REQUIREMENTS (OAC 3745-52-34(C))	Y/N/NA	RMK #
1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)	Y	
If so, are the following requirements of OAC 3745-52-34(C) being met:		
a. Quantities of waste accumulated do not exceed 55 gallons at any time?	Y	
b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?	NA	
c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?	Y	

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?	N	
a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;	NA	
b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?	NA	

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)	Y/N/NA	RMK #
1. Does the facility provide a personnel training program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan?	Y	
2. Does the facility provide personnel training to new employees within 6 months after the date of their employment as required by 3745-65-16(B)?	Y	
3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)?	Y	
4. Does the facility keep all of the records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records?	Y	

REMARKS - PERSONNEL TRAINING

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)	Y/N/NA	RMK #
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]	Y	
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?	N	
a. If yes, was the contingency plan implemented? [3745-65-51(B)]	NA	

NOTE: Small quantity generators are not required to maintain a contingency plan. Question #2(a) is, therefore, not applicable to SQGs.

3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]		
a. Internal alarm system?	Y	
b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
c. Portable fire control equipment, spill control and decontamination equipment?	Y	
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]	Y	
a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, name of person conducting the test, observations made, and date and nature of any repairs?	Y	
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]	Y	
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]	Y	

	Y/N/NA	RMK #
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]	Y	
8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [3745-65-37(B)]	NA	

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)	Y/N/NA	RMK #
1. Does the o/o have a written contingency plan which contains the following [3745-65-52(A)(B)(C)(D)(E)]:		
a. Actions to be taken by personnel in the event of an emergency?	Y	
b. Arrangements or agreements with local or state emergency authorities?	Y	
c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?	Y	
d. A list of all emergency equipment including location, physical description and outline of capabilities?	Y	
e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]?	Y	
2. Is the contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)]	Y	
3. Is a copy of the contingency plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)]	Y	
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54]	Y	
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the contingency plan designated at all times (on-site or on-call)? [3745-65-55]	Y	
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the contingency plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?	Y	

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)	Y/N/NA	RMK #
1. Are hazardous wastes stored in containers which are:		
a. Closed? [3745-66-73(A)]	Y	
b. In good condition? [3745-66-71]	Y	
c. Compatible with wastes stored in them? [3745-66-72]	Y	
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]	Y	
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]	Y	
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]	Y	
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:		
a. Date and time of inspections?	Y	
b. Name of inspector?	Y	
c. Notation of observations made during the inspection?	Y	
d. The date and nature of any repairs or other remedial action?	Y	
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,	Y	
a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Y	
b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]	Y	

NOTE: Small Quantity Generators are not required to comply with OAC Rule 3745-66-67 (except for wastes being accumulated in satellite accumulation areas). [See OAC Rules 3745-52-34(D)(2) and (C)(1)(a)]

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

	Y/N/NA	RMK #
IDENTIFICATION NUMBER (OAC 3745-65-11)		
1. Has the facility owner/operator received an identification number from Ohio EPA (or US EPA) as required by OAC 3745-65-11?	Y	
ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)		
2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by March 1st of each calendar year? [3745-65-75]	N	
WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)		
3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A)(1)?	N	
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A)(3)(a)]	NA	
5. **For off-site facilities;** Is the waste analysis repeated when results of inspections under 3745-65-13(A)(4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A)(3)(b)]	NA	
6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13(B)(1) through (6)]:		
a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B)(1)]	N	
b. The test methods to be used? [3745-65-13(B)(2)]	N	
c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13(B)(3)(a)(b)]	N	
d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B)(4)]	N	
e. **FOR OFF-SITE FACILITIES:** The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B)(5)]	N	

Y/N/NA RMK #

f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]? NA

g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):** NA

Does the waste analysis plan include procedures and schedules for:

i. The sampling of impoundment contents? [3745-65-13(B)(7)]

ii. The analysis of test data? [3745-65-13(B)(7)]

iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13(B)(7)

h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]

WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 apply to both on-site and off-site TSD facilities.

7. In accordance with OAC Rule 3745-65-13(B)(6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard? N

b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard? N

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73) Y/N/NA RMK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 which contains the following information:

   a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] N

   b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:

      i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?

      ii. The estimated (or actual) weight, volume or density of the waste?

      iii. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73?

   c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?

   d. Records of incidents which required implementation of the contingency plan?

   e. Records of any waste analyses and trial tests required to be performed?

   f. Records of the inspections required by the general inspection requirements under 3745-65-15?

   g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73(B)(6)?

   h. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B)(2)]

   i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

	Y/N/NA	RMK #
2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73(b)(9) through (14)]	N	

NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.

3. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]	NA	
4. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]		
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?		
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?		
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?		
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?		

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)	Y/N/NA	RMK #
1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A)(1)(2)] If so,	Y	
a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]	Y	
b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]	Y	
c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]	Y	
2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,	Y	
a. Is the schedule kept at the facility? [3745-65-15 (B)(2)]	Y	
b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B)(3)]	Y	
c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B)(4)]	Y	

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)	Y/N/NA	RMK #
1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]	Y	
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]	Y	

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -		
a. A 24-hour surveillance system, or;	N	
b. An artificial or natural barrier <u>and</u> a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]	Y	
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]	Y	

REMARKS - SECURITY REQUIREMENTS

OAC 3745-66 CLOSURE AND POST CLOSURE

	Y/N/NA	RMK #
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?	N	
a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?		
b. A description of how final closure will meet the requirements of 3745-66-11?		
c. An estimate of the maximum amount of hazardous waste ever in inventory?		
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?		
e. The year closure is expected to begin and a schedule for the various phases of closure?		
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?		
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]	NA	
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]		
4. Has the closure plan (and post-closure plan, if applicable) for any non land disposal unit(s) been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]		
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]		
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]		
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]		

	Y/N/NA	RMK #
8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accord- and with OAC 3745-66-16?	NA	
9. What permitted units at the facility have been closed in accordance with an approved closure plan? NA		
10. If closure was partial, list the regulated units which remain in use at the faciilty: NA		
11. If required, has the facility prepared a written post-closure plan? [3745-66-18]	N	
If so, does the post-closure plan include:		
a. A description of proposed ground water monitoring?		
b. A description of planned maintenance activities?		
c. The name, address and phone number of person/office to contact during the post-closure period?		
12. **For disposal facilities;** has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]	NA	
13. Has the owner of the property <u>on which a disposal unit is located</u> recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?		
b. Land use is restricted under closure and post-closure rules? [3745-66-19]		

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS	Y/N/NA	RMK#
1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes,	N	
(a) List the waste(s) affected:		
(b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)]	NA	
(c) When does the extension expire? _____		

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD		
2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes,	NA	
(a) List the waste(s) affected:		
(b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)]		

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION

	Y/N/NA	RMK#
3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,	NA	
(a) List the waste(s) affected:	↓	
(b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)]		

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]		
(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?	NA	
(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?	↓	
(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?		
(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?		

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

	Y/N/NA	RMK#
1. Does the land disposal facility retain copies of LDR notices and certifications? [O.A.C. Rule 3745-59-07(C)(1); 40 CFR 268.7(c)(1)]	N	
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]		
(a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]	N	
(b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]	N	
(c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]	N	

NOTE: Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.

3. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A),(C); 40 CFR 268.40(a),(c)]	N	
4. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]	NA	

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

OAC 3745-67 TREATMENT OR STORAGE IN WASTE PILES

	Y/N/NA	RMK #
1. Are waste materials subject to dispersal by wind adequately protected against such dispersal? [3745-67-51]	X/A	
2. If leachate or run-off from a waste pile is a hazardous waste, have the following steps been taken to prevent or properly manage the run-off: [3745-67-53]		
a. The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage? and;	N	
b. A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented? and;	N	
c. A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented? and;	N	
d. Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event?	N	
OR;		
e. The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff? and;	Y	
f. No liquids or wastes containing free liquids are placed in the pile?		
3. Before new waste materials are added to an existing waste pile, is it first ascertained that the material is compatible with the existing waste through appropriate laboratory testing? [3745-67-52]	NA	
a. Are the results of the analysis maintained in the facility's operating record as required by 3745-65-13? [3745-67-52]	NA	
4. Before ignitable or reactive wastes are placed in waste piles are one or both of the following met: [3745-67-56]		
a. The addition to the pile results in a mixture which no longer meets the definition of ignitable or reactive under rules 3745-51-21 or 3745-51-23 and the activity was conducted in compliance with the safety requirements of 3745-65-17?	N	

	Y/N/NA	RMK #
b. The ignitable or reactive material is physically or otherwise protected from conditions which may cause ignition or reaction?	Y	
5. Is the waste pile separated or protected from any incompatible materials which may be stored nearby? [3745-67-57(B)]	Y	
6. At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste? Closure has not yet been done	NA	

NOTE: If all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted. [3745-67-58]

REMARKS - WASTE PILE REQUIREMENTS

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E)(1) (40 CFR 268.1(e)(1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS	Y/N/NA	RMK#
1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
(a) **For determinations based solely on knowledge of the waste:** Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
(b) **For determinations based upon analytical testing:** Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,	Y	
(a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?	Y	
(b) **For listed wastes which also exhibit a characteristic:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]	NA	

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE	Y/N/NA	RMK#
5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?	N	
(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?	NA	
i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:		
a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D)(1)(a); 40 CFR 268.9(d)(1)(i)]		
b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. [Rule 3745-59-09(D)(1)(b); 40 CFR 268.9 (d)(1)(ii)]		
c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D)(1)(c); 40 CFR 268.9(d)(1)(iii)]		
ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B)(5)(a) (40 CFR 268.7 (b)(5)(i)? [O.A.C. Rule 3745-59-09(D)(2); 40 CFR 268.9(d)(2)]		

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

NOTIFICATION/CERTIFICATION	Y/N/NA	RMK#
6. **For wastes that do not meet treatment standards:** Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]	Y	1
If so, does the notification include the following:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(1)(a); 40 CFR 268.7(a)(1)(i)]	Y	
(b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A)(1)(b); 40 CFR 268.7(a)(1)(ii)]	Y	
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(1)(c); 40 CFR 268.7(a)(i)(iii)]	Y	
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d); 40 CFR 268.7(a)(1)(iv)]	Y	
7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]	N	1
8. **For wastes that meet treatment standards:** Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A)(2); 40 CFR 268.7(a)(2)]	NA	
If so, does the notice/certification include the following:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(2)(a)(i); 40 CFR 268.7(a)(2)(i)(A)]		
(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(ii); 40 CFR 268.7(a)(2)(i)(B)]		
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(iii); 40 CFR 268.7(a)(2)(i)(C)]		
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(2)(a)(iv); 40 CFR 268.7(a)(2)(i)(D)]		
(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A)(2)(b); 40 CFR 268.7(a)(2)(ii)]		

	Y/N/NA	RMK#
9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A)(2); 40 CFR 268.7(a)(2)]	NA	
10. For wastes subject to a case-by-case extension, exemption or a variance: Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A)(3); 40 CFR 268.7(a)(3)]	NA	
If so, does the notice contain the following information:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A)(3)(a); 40 CFR 268.7(a)(3)(i)]		
(b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(b); 40 CFR 268.7(a)(3)(ii)]		
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(3)(c); 40 CFR 268.7(a)(3)(iii)]		
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(3)(d); 40 CFR 268.6(a)(3)(iv)]		
(e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(e); 40 CFR 268.7(a)(3)(v)]		
11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07(A)(6); 40 CFR 268.7(a)(7)]	✓	

REMARKS

1) Several manifesto were missing notifications.

TRACKING - DHWM, CM&ES

TO GO ON: ✓ RCRIS __ DBASE __ FO LOG __ USEPA LOG __ CJ LOG

ENTERED: ✓ RCRIS __ DBASE __ FO LOG __ USEPA LOG __ CJ LOG

RCRIS ENTRY CODES: (EVALULATION)_____ (ENFORCEMENT)_____

CEI __ CI __ OTHER _____ INITIAL NOV __ FOLLOW-UP NOV __

FULL RTC __ PRTL RTC ✓ TCLP __ LDR __ SENT TO USEPA: YES__ NO__

Ohio EPA

State of Ohio Environmental Protection Agency

Northwest District Office
347 North Dunbridge Road
P.O. Box 466
Bowling Green, Ohio 43402-0466
(419) 352-8461 FAX (419) 352-8468

George V. Voinovich
Governor

RECEIVED
JUL 31 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION

Re: Partial RTC
OHD 005 045 729
Hazardous Waste
Auglaize County

June 15, 1992

CERTIFIED MAIL

Mr. Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

Dear Mr. Froning:

During a May 7, 1991 compliance evaluation inspection, Hoge Lumber Company (Hoge) was found to be in violation of the following of Ohio's hazardous waste rules.

1. **Ohio Revised Code (ORC) 3745-02(F)** states in part that: "No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated or disposed of...except at or to any of the following: (1) A hazardous waste facility operating under a permit in accordance with this chapter...". Hoge has treated and disposed of hazardous waste without a permit. Specifically, waste paint and solvents (D001/F003/F005) were mixed and burned behind the facility, spent solvents (D001/F003/F005) were disposed of outside of the cabinet shop door, and quenching water (F003/F005) was discharged to the ground from a pipe through the outside wall.

   The Ohio Environmental Protection Agency (Ohio EPA) understands that Hoge is no longer treating or disposing of hazardous waste, however, this violation cannot be corrected until the closure of all hazardous waste management units has been certified.

2. **OAC 3745-50-40(B)** Hoge has not submitted a completed application for a hazardous waste treatment and disposal permit prior to constructing the treatment and disposal units.

   The Ohio EPA understands that Hoge is no longer treating or disposing of hazardous waste, however, this violation cannot be corrected until the closure of all hazardous waste management units has been certified.

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3. **OAC 3745-65-13(A)(1)** Hoge does not have a sufficiently detailed Chemical and Physical analysis of the waste material containing all of the information which must be known to properly treat, store, or dispose of the waste.

   Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

4. **OAC 3745-65-13(B)(1)-(6)** Hoge's waste analysis plan is incomplete and does not thoroughly describe the analytical parameters, test methods, sampling methods, testing frequency, and responses to any changes that may affect the character of the waste.

   The written waste analysis plan shall include, but not be limited to: (a) parameters for analysis and the rationale for the selection of these parameters, (b) sampling methods, (c) test methods, and (d) frequency of analysis.

   Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

5. **OAC 3745-65-14(B)(2)(a)(b)** Hoge does not maintain an artificial or natural barrier, which completely surrounds the active portions of the facility, and a means to control entry at all times through the gates or other entrances to the active portion of the facility.

   Although all solvent wastes currently being stored on-site are kept in a locked shed and cabinet, the facility does not have a fence around the area where unpermitted burning and dumping took place.

   Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

6. **OAC 3745-65-73** Hoge has not maintained a written operating record at the facility as required of all hazardous waste treatment-storage-disposal facilities. Such a record must include, but not be limited to, the following: (a) a description and quantity of each hazardous waste and the method and date of its treatment, storage, or disposal within the facility; (b) the location of all hazardous waste at the facility and the quantity at each location; (c) the common name, EPA hazardous waste code, and physical state of the waste; (d) records of waste analysis; (e) records of incidents that require implementation of the contingency plan; (f) records and results of inspections; and, (g) all closure cost estimates.

   Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

7. **OAC 3745-65-75** Hoge has not submitted an annual Treatment, Storage, or Disposal Facility Operating Report to the Director of the Ohio EPA by March 1 of 1991.

   Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

8. **OAC 3745-66-12** Hoge does not have a written closure plan for the facility which identifies the steps necessary to perform final closure of the facility. Closure plans must be maintained on-site for each area of hazardous treatment, storage, or disposal. The closure plan must contain the following elements:

   A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11;

   A description of how final closure will meet the requirements of 3745-66-11;

   An estimate of the maximum amount of hazardous waste ever in inventory;

A description of the steps to be taken to decontaminate facility equipment, containment systems, structures, soils, and all hazardous waste residues;

The year closure is expected to begin, and a schedule for the various phases of closure;

A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-on/runoff control.

A closure plan must be submitted immediately to the Ohio EPA for each hazardous waste treatment, storage, or disposal area.

9. **OAC 3745-67-51** Hoge has not covered or otherwise managed the hazardous waste burn pile area so that wind dispersal of contaminated soil or ash is controlled.

On June 1, 1992, this office received photographic documentation demonstrating that the burn area has been covered with an impermeable liner, thus correcting this violation.

10. **OAC 3745-67-53** Hoge has not taken steps to control run-on and runoff from the hazardous waste burn pile area. As the burn area has already been partially excavated and is surrounded by earthen berms, the main concern of the Ohio EPA is that run-on is prevented from entering the burn area and generating hazardous waste leachate.

On June 1, 1992, this office received photographic documentation demonstrating that the burn area has been covered with an impermeable liner, thus correcting this violation.

11. **OAC 3745-67-56** Hoge has placed ignitable solvent waste on a solid waste pile without protecting it from conditions which may cause ignition.

Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

The following Land Disposal Restriction violations were also noted during the inspection:

12. **OAC 3745-59-07** For treated solvent wastes with treatment standards expressed as concentrations in the waste extract, in OAC Rule 3745-59-41, Hoge has not tested the treatment residues, or an extract of such residues, to assure that the treatment residues or extract meet the applicable treatment standards.

    Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

13. **OAC 3745-59-40 (A)(C)** Hoge did not prohibit the disposal of restricted F003/F005 spent solvent wastes or treatment residues which exceed the concentration based treatment standards of OAC Rule 3745-59-41.

    Hoge is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

On June 1, 1992, this office received documentation consisting of photographs documenting that the burn area has been bermed and covered. With this documentation violations 9 and 10 are considered corrected.

Your May 29, 1992 letter states that a closure plan has been prepared for Hoge and is in the possession of the facility's attorney. However, since there is not a plan available for Agency verification and review at this time, violation 8 must remain outstanding.

As of this date, violations 1, 2, 3, 4, 5, 6, 7, 8, 11, 12, and 13 remain outstanding.

This communication does not release Hoge, in any manner, from liability for past violations of Ohio's hazardous waste laws or rules at the facility.

Please contact me at (419) 352-8461 if you have any questions.

Sincerely,

Elizabeth Ames
Division of Hazardous
Waste Management

/rab

pc: John Schierberl, DHWM, CO
Laurie Stevenson, DHWM, CO
Susan Ashbrook, AGO
Bob Ashton, AGO
NWDO File

RECEIVED
OHIO EPA
JUN 16 1992
WASTE MGT.

OhioEPA
State of Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
P.O. Box 466
Bowling Green, Ohio 43402-0466
(419) 352-8461 FAX (419) 352-8468

TRACKING - DHWM, CM&ES
TO GO ON: ✓ RCRIS ✓ DBASE __ FO LOG __ USEPA LOG __ CJ LOG
ENTERED: ✓ RCRIS ✓ DBASE __ FO LOG __ USEPA LOG __ CJ LOG
RCRIS ENTRY CODES: (EVALULATION) 007 (ENFORCEMENT) 008
CEI ✓ CI __ OTHER _____ INITIAL NOV __ FOLLOW-UP NOV __
FULL RTC __ PRTL RTC __ TCLP ✓ LDR ✓ SENT TO USEPA: YES __ NO __

NO TC
HC

George V. Voinovich
Governor

RECEIVED
AUG 04 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, Region

Re: Notice of Violation
OHD 005 045 729
Hazardous Waste
Auglaize County

May 20, 1992

CERTIFIED MAIL

Mr. Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

Dear Mr. Froning:

On May 7, 1992, the Ohio Environmental Protection Agency conducted a hazardous waste compliance evaluation inspection of Hoge Lumber Company located in New Knoxville, Ohio. This inspection was conducted in order to determine Hoge's compliance with Ohio's generator and treatment, storage and disposal regulations as adopted under Chapter 3745 of the Ohio Administrative Code (OAC). Hoge was represented by John Hoge, Joe Niekamp and yourself. The Ohio EPA was represented by John Schierberl and myself. The Agency's inspection included a tour of your facility and a review of written documentation. Hoge produces cut lumber, cabinetry, flooring and other lumber products. Hazardous wastes currently generated at this site include D001/D005 spent solvents and D001/F003 paint related waste. In the past, prior to the off-site management of hazardous wastes, the company treated and disposed of D001/F003/F005 solvent waste and disposed of F003/F005 quenching water waste.

During the inspection, the following violations of Ohio's hazardous waste rules were observed and noted.

1. **Ohio Revised Code (ORC) 3745-02(F)** states in part that "No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated or disposed of ...except at or to any of the following: (1) A hazardous waste facility operating under a permit in accordance with this chapter...". Hoge Lumber Company has treated and disposed of hazardous waste without a permit. Specifically, waste paint and solvents (D001/F003/F005) were mixed and burned behind the facility, spent solvents (D001/F003/F005) were disposed of outside of the cabinet shop door, and quenching water (F003/F005) was discharged to the ground from a pipe through the outside wall.

2. **OAC 3745-50-40(B)** Hoge Lumber Company has not submitted a completed application for a hazardous waste treatment and disposal permit prior to constructing the treatment and disposal units.

   The Ohio EPA understands that Hoge Lumber is no longer treating or disposing of hazardous waste, however, this violation cannot be corrected until the closure of all hazardous waste management units has been certified.

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3. **OAC 3745-65-13(A)(1)** Hoge Lumber Company does not have a sufficiently detailed Chemical and Physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste.

   Hoge Lumber Company is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

4. **OAC 3745-65-13(B)(1)-(6)** Hoge Lumber Company's waste analysis plan is incomplete and does not thoroughly describe the analytical parameters, test methods, sampling methods, testing frequency, and responses to any changes that may affect the character of the waste.

   The written waste analysis plan shall include, but not be limited to: (a) parameters for analysis and the rationale for the selection of these parameters; (b) sampling methods; (c) test methods; and, (d) frequency of analysis.

   Hoge Lumber Company is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

5. **OAC 3745-65-14(B)(2)(a)(b)** Hoge Lumber Company does not maintain an artificial or natural barrier, which completely surrounds the active portions of the facility, and a means to control entry at all times through the gates or other entrances to the active portion of the facility.

   Although all solvent wastes currently being stored on-site are kept in a locked shed and cabinet, the facility does not have a fence around the area where unpermitted burning and dumping took place.

   Hoge Lumber Company is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

6. **OAC 3745-65-73** Hoge Lumber Company has not maintained a written operating record at the facility as required of all hazardous waste treatment-storage-disposal facilities. Such a record must include, but not be limited to, the following: (a) a description and quantity of each hazardous waste and the method and date of its treatment, storage, or disposal within the facility; (b) the location of all hazardous waste at the facility and the quantity at each location; (c) the common name, EPA

hazardous waste code, and physical state of the waste; (D) records of waste analysis; (e) records of incidents that require implementation of the contingency plan; (f) records and results of inspections; and, (g) all closure cost estimates.

Hoge Lumber Company is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

7. **OAC 3745-65-75** Hoge Lumber Company has not submitted an annual Treatment, Storage, or Disposal Facility Operating Report to the Director of the Ohio EPA by March 1 of 1991.

   Hoge Lumber Company is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

8. **OAC 3745-66-12** Hoge Lumber Company does not have a written closure plan for the facility which identifies the steps necessary to perform final closure of the facility. Closure plans must be maintained on site for each area of hazardous treatment, storage or disposal. The closure plan must contain the following elements:

   A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11;

   A description of how final closure will meet the requirements of 3745-66-11;

   An estimate of the maximum amount of hazardous waste ever in inventory;

   A description of the steps to be taken to decontaminate facility equipment, containment systems, structures, soils and all hazardous waste residues;

   The year closure is expected to begin and a schedule for the various phases of closure;

   A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-on/run-off control.

   A closure plan must be submitted immediately to the Ohio EPA for each hazardous waste treatment, storage or disposal area.

9. **OAC 3745-67-51** Hoge Lumber Company has not covered or otherwise managed the hazardous waste burn pile area so that wind dispersal of contaminated soil or ash is controlled.

   The Ohio EPA understands that there is no longer a "pile" at the burn area and that the facility has already performed preliminary remediation of the area. However, the burn area is still classified as a hazardous waste pile and must be maintained covered until closure is implemented. Hoge Lumber Company must submit photographic documentation to the Ohio EPA demonstrating that the burn area has been covered with an impermeable liner.

10. **OAC 3745-67-53** Hoge Lumber Company has not taken steps to control run-on and run-off from the hazardous waste burn pile area. As the burn area has already been partially excavated and is surrounded by earthen berms the main concern of the Ohio EPA is that run-on is prevented from entering the burn area and generating hazardous waste leachate.

    Hoge Lumber Company must immediately take steps to prevent the run-on and run-off of precipitation from the hazardous waste burn pile area. Hoge Lumber Company must submit photographic documentation to the Ohio EPA demonstrating that the burn area has been covered with an impermeable liner.

11. **OAC 3745-67-56** Hoge Lumber Company has placed ignitable solvent waste on a solid waste pile without protecting it from conditions which may cause ignition.

    Hoge Lumber Company is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

The following Land Disposal Restriction violations were also noted during the inspection:

12. **OAC 3745-59-07** For treated solvent wastes with treatment standards expressed as concentrations in the waste extract, in OAC Rule 3745-59-41, Hoge Lumber Company has not tested the treatment residues, or an extract of such residues to assure that the treatment residues or extract meet the applicable treatment standards.

    Hoge Lumber Company is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

13. **OAC 3745-59-40 (A)(C)** Hoge Lumber Company did not prohibit the disposal of restricted F003/F005 spent solvent wastes or treatment residues which exceed the concentration based treatment standards of OAC Rule 3745-59-41.

    Hoge Lumber Company is in violation of this rule due to their continuing status as a treatment and disposal facility. The facility's submittal and implementation of an approved closure plan for the hazardous waste treatment and disposal areas will be adequate, in part, to address this violation.

Please respond, in writing, to this Notice of Violation (NOV) within ten days. Your response must include all actions and timetables necessary to demonstrate compliance.

Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the completed inspection form is enclosed for your review. Please contact me at (419) 352-8461 if you have any questions.

Sincerely,

Elizabeth Ames
Division of Hazardous
Waste Management

RECEIVED
OHIO EPA
MAY 23 1992
DIV. OF HAZARDOUS WASTE MGT.

/dlh

Enclosure

pc: John Schierberl, DHWM, CO
Laurie Stevenson, DHWM, CO
Susan Ashbrook, AGO
Bob Ashton, AGO
NWDO File

OhioEPA
State of Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
P.O. Box 466
Bowling Green, Ohio 43402-0466
(419) 352-8461 FAX (419) 352-8468

RECEIVED
DEC 17 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION

CMEL
~~INSP~~
LDF

RECEIVED DEC 22 1992
WMD RCRA Compliance
RECORD CENTER

George V. Voinovich
Governor

Re: Notice of Violation
ODH 005045729
Hazardous Waste
Auglaize County

TRACKING - DHWM, CM&ES
TO GO ON: ✓ RCRIS __ DBASE __ FO LOG __ USEPA LOG __ CJ LOG
ENTERED: ✓ RCRIS __ DBASE __ FO LOG __ USEPA LOG __ CJ LOG
RCRIS ENTRY CODES: (EVALULATION) 008 (ENFORCEMENT) 010
CEI __ CI __ OTHER _____ INITIAL NOV __ FOLLOW-UP NOV __
FULL RTC __ PRTL RTC __ TCLP __ LDR __ SENT TO USEPA: YES__ NO__

September 5, 1991

CERTIFIED MAIL

Mr. Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

Dear Mr. Froning:

On July 23, 1991, the Ohio Environmental Protection Agency conducted an unannounced hazardous waste compliance evaluation inspection of Hoge Lumber Company located in New Knoxville, Ohio. This inspection was conducted in order to determine Hoge Lumber Company's compliance with Ohio's generator and treatment, storage and disposal regulations as adopted under Chapter 3745 of the Ohio Administrative Code (OAC). Hoge Lumber Company was represented by Clark Froning. The Ohio EPA was represented by Maryann Seghy, Jeff Steers, and Beth Ames. The Agency's inspection included a tour of the facility and a review of written documentation.

At earlier inspections conducted by the OEPA/NWDO and the Special Investigations Unit of the Ohio EPA, it was discovered that the facility was illegally incinerating and/or disposing of hazardous waste. This case is currently being handled by the Ohio Attorney General's Office and the Ohio EPA.

Hoge Lumber operates a paint spray booth for painting/treating finished lumber products. In the past the spent solvent waste was routinely disposed by placing it on a burn pile in the facility backyard and, along with other solid waste, was incinerated. Also, it was found that the facility discharged to the ground solvent contaminated waste water resulting from quenching operations.

The Ohio EPA recognizes that Hoge Lumber has attempted to correct some violations sited during the May 7, 1990 inspection. It is also recognized that Hoge Lumber's record keeping and waste management procedures have improved. Hoge Lumber Company has removed some soil from the illegal hazardous waste disposal area. This soil was handled and disposed of as hazardous waste.

Printed on recycled paper

During the inspection, the following violations of Ohio's hazardous waste rules were observed and noted.

1. **Ohio Revised Code (ORC) 3745-02(F)** states in part that "No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated or disposed of ...except at or to any of the following: (1) A hazardous waste facility operating under a permit in accordance with this chapter...". Hoge Lumber Company has treated hazardous waste without a permit. Specifically, waste paint and solvents were mixed and burned in the backyard. Hoge Lumber Company is considered to be operating in violation of this rule until such time when closure of the disposal area is certified.

2. **OAC 3745-50-40(B)** Hoge Lumber Company has not submitted a complete application for a hazardous waste treatment permit. Therefore, the company does not possess an approved hazardous waste treatment permit, and is in violation of this rule.

3. **OAC 3745-52-30, OAC 3745-52-31 and OAC 3745-52-32** Hoge Lumber Company did not label, package and mark waste material in accordance with applicable DOT regulations.

4. **OAC 3745-52-32(B)** Each container with a capacity of 110 gallons or less is not affixed with a complete hazardous waste label as required by this rule. Specifically, two 55 gallon drums of quenching water in the inside drum storage area, and one 55 gallon drum of waste solvent in the outside hazardous waste storage area are not affixed with completed hazardous labels.

5. **OAC 3745-52-34(A)(2)(3)** The waste is placed in containers and the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. While being accumulated on site each container and tank is labeled or marked with the words "Hazardous Waste."

   Specifically, two drums in the inside hazardous waste storage area and one drum in the outside hazardous waste storage areas were not labeled or dated.

6. **OAC 3745-52-34(C)** Hoge Lumber has failed to mark containers in satellite accumulation areas. The accumulation container for paint and solvent waste located in the paint room was not marked with the words "Hazardous Waste" or with other words indentifying the contents of the container.

7. **OAC 3745-65-13(A)(1)** The owner/operator must have a detailed Chemical and Physical analysis of the waste material containing all of the information which must be known to properly treat, store, or dispose of the waste.

   The facilities waste analysis plan is incomplete. Thus, the Hoge Lumber Company is in violation of the above rule. The analysis may include data developed under OAC 3745-51, and existing, published, or documented data on the hazardous waste or on waste generated from similar processes.

8. **OAC 3745-65-13(B)(1)-(6)** The owner/operator must maintain a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency, and responses to any changes that may affect the character of the waste.

   Hoge Lumber Company has an incomplete waste analysis plan and hence is in violation of the above rule. The written waste analysis plan shall include, but not be limited to: (a) parameters for analysis and the rationale for the selection of these parameters; (b) sampling methods; (c) test methods; and (d) frequency of analysis.

9. **OAC 3745-65-14(B)(2)(a)(b)** The owner/operator must maintain an artificial or natural barrier, which completely surrounds the active portion of the facility, and a means to control entry at all times through the gates or other entrances to the active portion of the facility.

   The facility does not have a fence around the area where unpermitted burning and dumping took place; therefore, Hoge Lumber Company is in violation of the above rule. Such a fence should be installed immediately.

10. **OAC 3745-65-14(C)** A sign with the legend "Danger--Unauthorized Personnel Keep Out" shall be posted at each entrance to the active portion of a facility, and at other locations, in sufficient numbers to be seen from any approach to this active portion.

    The facility does not have any signs at its hazardous waste areas. This facility is thus in violation of the above rule. Such signs should be posted immediately.

11. **OAC 3745-65-15(B)** Hoge Lumber Company has not developed, and maintained on-site, a written schedule of inspecting safety equipment, emergency equipment, security devices and operating and structural equipment. The schedule must identify the types of problems, including malfunctions of deterioration, which are to be looked for during the inspection.

12. **OAC 3745-65-15(D)** Hoge Lumber Companies inspection records are incomplete. These records must contain, at a minimum, the date and time of the inspection, the name of the inspector, a notation of the inspection made, and the date and nature of any repairs or other remedial action.

13. **OAC 3745-65-16(A)(B)(C)(D)&(E)** The owner/operator must provide to all a Personnel training program including instruction in safe equipment operation and emergency response procedures, training new employees within six months, and providing an annual refresher course. In addition documentation regarding written job titles, job descriptions and training records must be maintained.

    Hoge Lumber must train personnel handling hazardous waste accordingly. Also, the generator has failed to keep required records. The owner/operator shall maintain the following documents at the facility: a written job title and employee name for each position related to hazardous waste; a written job description including requisite skill, education, or other qualifications and duties of a position related to hazardous waste; detailed description of training ; documentation of the above; and records of past training, etc. See OAC 3745-65-16(D)(E) for details.

14. **OAC 3745-65-17(A)** "No Smoking" and "No Open Flame" signs are not placed near areas where ignitable or reactive wastes are handled. Such signs should be posted in the paint room, the inside hazardous waste storage area, and the outside hazardous waste storage area immediately.

15. **OAC 3745-65-32(B)** The facility shall be equipped with a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or local or Ohio EPA emergency response teams.

    Hoge Lumber Company does not have communication equipment immediately available at the areas where hazardous waste are handled. Therefore the facility is in violation of the above rule.

16. **3745-65-34(A)** Wherever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation shall have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

    Hoge Lumber Company does not provide personnel immediate access to a communication device where hazardous waste is handled and is therefore in violation of the above rule.

17. **3745-65-52(E)** The contingency plan shall include a list of all emergency equipment at the facility, including but not limited to, fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment, where this equipment is required. This list shall be kept up to date. In addition, the contingency plan shall include the location and a physical description of each item on the list, and a brief outline of its capabilities.

    Hoge Lumber Company's contingency plan does not comply with the above rule. The contingency plan must include the items listed above.

18. **OAC 3745-65-73** Hoge Lumber Company does not maintain a written operating record at the facility as required of all hazardous waste treatment-storage-disposal facilities. Such a record must include, but not be limited to, the following: (a) a description and quantity of each hazardous waste and the method and date of its treatment, storage, or disposal within the facility; (b) the location of all hazardous waste at the facility and the quantity at each location; (c) the common name, EPA hazardous waste code and physical state of the waste; (d) records of waste analysis; (e) records of incidents that require implementation of the contingency plan; (f) records and results of inspections; and (g) all closure cost estimates.

19. **OAC 3745-65-75** Hoge Lumber Company has not submitted an annual Treatment, Storage, or Disposal Facility Operating Report to the Director of the Ohio EPA by March 1st of 1991.

20. **OAC 3745-66-12** A written closure plan as required in the regulations must be maintained and updated by the facility.

    The facility has as a result of past operations disposed to the ground solvent wastes (F003) or solvent contaminated waste waters at three different locations namely the waste burn pile area, the discharge area for waste waters next to the building, and the storage/accumulation area. The facility must investigate the extent of contamination and submit a closure plan to the Director of the Ohio EPA within forty five (45) days of receipt of this letter.

21. **OAC 3745-66-73(A)** A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

    Hoge Lumber Company is in violation of the above rule. During the inspection hazardous waste containers were open in the paint room. Also, a 55 gallon drum located in the outside hazardous waste storage area was open. If Hoge Lumber desires to continue use of a funnel, the OEPA recommends secure attachment of the funnel to the drum and an automatic locking lid.

22. **OAC 3745-66-73(B)** Hoge Lumber Company has stored and handled hazardous waste containers in a manner which does not prevent container rupture or leakage. Wastes are improperly stored in both of the hazardous waste storage areas and the paint room.

23. **OAC 3745-66-74(B)** The owner/operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. Hoge Lumber Company does not record inspections in an inspection log or summary. The inspection log or summary shall contain the date and time of inspections, name of inspector, notation of observations made during the inspection, and the date and nature of any repairs or other remedial action.

24. **OAC 3745-67-51** Hoge Lumber Company has not covered or otherwise managed the hazardous waste pile so that wind dispersal is controlled.

25. **OAC 3745-67-53** Hoge Lumber Company has not attempted to control run-off from the hazardous waste pile.

The following Land Disposal Restriction Violations were also noted during the inspection:

26. **OAC 3745-59-50(A)(2)(a)** All containers holding prohibited wastes are not clearly marked to identify the contents and date(s) entering storage. F001-F005 wastes are being stored in unmarked containers.

27. **OAC 3745-65-13** Hoge Lumber Company's waste analysis plan does not address the F001-F005 Spent Solvent Land Disposal Restriction waste category.

28. **OAC 3745-65-13** Hoge Lumber has not obtained a detailed chemical and physical analysis of a representative sample of the wastes.

29. **OAC 3745-59-07** For wastes with treatment standards expressed as concentrations in the waste extract 3745-59-41, the owner or operator of the treatment facility must test the treatment residues, or an extract of such residues developed using the test method described in Appendix I of this part, to assure that the treatment residues or extract meet the applicable treatment standards.

    Hoge Lumber Company has not tested wastes to assure compliance with treatment standards.

30. **OAC 3745-59-07** For wastes with treatment standards expressed as concentrations in the waste 40 CFR 268.43, the owner/operator of the treatment facility must test the treatment residues (not an extract of such residues) to assure that the treatment residues meet the applicable treatment standards.

    Hoge Lumber has not tested its waste to assure compliance with the treatment standards.

31. **OAC 3745-65-73** Hoge Lumber Company has not kept a written operating record of the facility during the time it acted as a treatment/storage/disposal facility.

32. **OAC 3745-59-50** Hoge Lumber Company has not clearly marked and dated hazardous waste containers.

33. **OAC 3745-59-04** Hoge Lumber Company is in violation of Land Disposal Restriction surface impoundment rules.

34. **OAC 3745-59-07** Hoge Lumber Company did not test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met.

Please be advised that failure to comply with applicable hazardous waste rules may be cause for enforcement action by this Agency Pursuant to Chapter 3734 of the Ohio Revised Code.

Please respond, in writing, to this Notice of Violation (NOV) within ten (10) days. Your response must include all actions and timetables necessary to demonstrate compliance.

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: Hoge Lumber Company

USEPA I.D.: OHD 005 045 729 HWFB No.: _____

Street: 700 South Main St

City: New Knoxville State: OH Zip: 45871

County: Auglaize Co. Telphone: (419) 753-2263

PUCO No.: _____

Owner/Operator: _____

Street: _____

City: _____ State: _____ Zip: _____

Telephone: _____

Inspection Date: 07/23/91 Time: 10:15 - 12:00

Advance notice of inspection given? (yes) ____ (no) ✓
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspectors:	Maryann Segby	OEPA/NWDO/DSHWM-E.Spec	352-8461
	Beth Ames	"	"
Facility Representative:	Jeff Steers	" Group Leader	352-8461
	Clark Froning	Hoge Lumber - V. Pres.	753-2263

STATUS

Cond. Ex. SQG___ SQG ✓ Large Quantity Generator___
? Treatment___ Storage___ Disposal___ Transporter___

Part A Permit: (yes) ____ (no) ✓ Part B Permit: (yes) ____ (no) ____
LDR Checklist Attached: (yes) ✓ (no) ____

ACTIVITIES

Containers ✓
Tanks___
Wastepile ✓
Landfill___
Surface Impoundment___

Used oil burner___
Hazardous waste fuel burner/blender___
Incineration/Thermal treatment ✓
Land treatment___
Groundwater monitoring___

Revised: 1/7/91

REMARKS - GENERAL INFORMATION

Include list of wastes being managed at the site and a brief description of site activity and waste handing procedures:

The Ohio EPA including Maryann Sighy, Beth Ames, + Jeff Steers conducted an unannounced inspection at Hoge Lumber on 7-23-91. Representing Hoge Lumber were Clark Froning (V.P.) and Joe Nikamp (an employee who has taken the 40 hr. Haz. Waste training @ U. of Findlay).

Hoge Lumber is in enforcement w/ the Asst. Attorney General. They ~~are~~ were burning solvent ~~at the back of~~ behind the building. They have sampled + shipped soil off site. Hoge Lumber is required to clean close the area. We are awaiting their closure plan.

There are 2 hazardous waste streams. The painting area generate ~~so~~ a mixture of solvent + waste paint. Also the quenching water used in the metal process is considered hazardous. The solvent is collected at satellite accum. and taken to an outside storage area. The quenching water is changed every 3 mos., approximately 3 drums of waste is collected + picked up by a TSD.

FACILITY INSPECTION
WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE			ON SITE MANAGEMENT											OFF SITE MANAGEMENT	
EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR			TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLED	CONTAINER	INTOUNDMENT	TANK	WASTE PILE	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT	DISPOSAL FACILITY
			LESS THAN 90 DAYS	LESS THAN 180 DAYS	LESS THAN 270 DAYS										
F001 F003	2 Gal/mo.	Cleaning Paint Spray Gun + Line		✓		✓	Burned in Back		✓			✓		Transported by SafetyKleen	Chemical Solvent Inc Cleveland
F006	1 Drum/mo.	Quenching Water Procedure		✓		✓			✓			✓		"	"

PERMIT STATUS

	Y/N/NA	RMK#
1. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	N	#1
When was the facility's Part A submitted:		
2. Is the facility operating in compliance with the terms conditions of its HWFB permit?	NA	#2
If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?	NA	
If yes, what date was the PCR submitted?		
3. Has the facility submitted a Part B?	N	#3

REMARKS - PERMIT STATUS

#1 Hoge Lumber has failed to submit a Part A application for incineration of hazardous waste.

#2 The facility has failed to have a HWFB Permit.

#3 The facility has failed to submit a Part B permit. The facility has ceased operation as a TSD and ~~at~~ the OEPA is awaiting a closure plan.

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)	Y/N/NA	RMK #
1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A)(B) and (C)?	Y	
If not, specify those waste streams which the generator has failed to adequately evaluate:		
2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?	N	
If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:		
3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06?	N	
If so, please identify these waste streams below:		

	Y/N/NA	RMK #
4. Is the generator recycling any materials on-site by:		
a. Using or reusing the material as an ingredient in an industrial process to make a product?	N	
i. If so, is the material being reclaimed before it is used or reused?		
b. Using the material as a substitute for commercial products?	N	
c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?	N	
i. If so, is the material reclaimed before returning to the original process?		

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?	N	

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

6. Are Land Disposal Restricted (LDR) wastes being generated? If so, complete the <u>Land Disposal Restriction Checklist</u>.	Y	

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

7. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from USEPA as required by 3745-52-12?	Y	#1

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

8. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?	Y	

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57 AND OAC 3745-52-60)	Y/N/NA	RMK #
9. Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 through 3745-52-57 and 3745-52-60?		

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)	Y/N/NA	RMK #
10. Does the generator meet the following pre-transport requirements prior to offering hazardous wastes for transport off-site:		
a. The waste material is packaged, labeled, and marked in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32]?	N	#2
b. Each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32?	N	#3
c. The generator meets the requirements for proper DOT placarding <u>or</u> offers the appropriate DOT placards to the initial transporter in compliance with 3745-52-33?	Y	

REMARKS - PRETRANSPORT REQUIREMENTS

#1 Hogg Lumber acted as an illegal TSD

#2+#3 During the Inspection it was noted that hazardous waste drums were not labeled correctly.

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS (OAC 3745-52-34) — Y/N/NA — RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

   a. The containers or tanks are clearly marked with the words "Hazardous Waste"? [OAC 3745-52-34(A)(3)] — NA ____
   b. The date that accumulation began is clearly marked on each container? [OAC 3745-52-34(A)(2)] — NA ____

In addition, OAC 3745-52-34(A)(1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete **Management of Containers** checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks? — N ____

   If so, OAC 3745-52-34(A)(1) requires generators to comply with Rules 3745-66-90 to 3745-66-992 except Paragraph (c) of rule 3745-66-97 and rule 3745-66-991.

   If the generator is accumulating hazardous waste(s) in tanks, complete the **Storage and Treatment in Tanks** checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days? — Y — #1

   a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days? — N ____

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

#1 The area where solvents were burned was not clean closed

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)	Y/N/NA	RMK #
1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:		
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20(A)?	Y	
b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?	Y	
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E)?	Y	
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A)(1)(2)?	Y	
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?	Y	
a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42?	NA	
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?	Y	

REMARKS - MANIFEST REQUIREMENTS

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

   (yes) _____ (no) ✓

   If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

   (yes) ✓ (no) _____

   If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

   OR;

   b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

   (yes) _____ (no) _____

   If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation) — Y ____

   If so, are the following requirements of OAC 3745-52-34(C) being met:

   a. Quantities of waste accumulated do not exceed 55 gallons at any time? — Y ____
   b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? — N/A ____
   c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container? — N #1

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b? — N ____

   a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and; — NA ____

   b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating? — NA ____

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

#1 The containers accumulating waste solvent & waste paint must be labeled or clearly marked "Hazardous Waste"

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

	Y/N/NA	RMK #
IDENTIFICATION NUMBER (OAC 3745-65-11)		
1. Has the facility owner/operator notified U.S. EPA of hazardous waste activity and obtained a U.S. EPA identification number [OAC 3745-65-11]?	Y	
ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)		
2. Has the owner/operator submitted an annual Treatment-Storage-Disposal Operating Report to the Director of the Ohio EPA by March 1st of each calendar year? [3745-65-75]	N	
WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)		
3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A)(1)?	N	
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A)(3)(a)]	NA	
5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13(A)(4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A)(3)(b)]	NA	
6. Does o/o have a written waste analysis plan which includes the following information [OAC 3745-65-13(B)(1) through (6)]:		
a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B)(1)	N	
b. The test methods to be used? [3745-65-13(B)(2]	N	
c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13(B)(3)(a)(b)]	N	
d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B)(4)]	N	

	Y/N/NA	RMK #
e. **FOR OFF-SITE FACILITIES:** The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B)(5)]	NA	
f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)?	NA	
g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):**	NA	
Does the waste analysis plan include procedures and schedules for:		
i. The sampling of impoundment contents? [3745-65-13(B)(7)]		
ii. The analysis of test data? [3745-65-13(B)(7)]		
iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13-(7)		
h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]	NA	

REMARKS - WASTE ANALYSIS REQUIREMENTS

Stoge Lumber was acting as an illegal TSD by incinerating hazardous waste. Therefore Stoge Lumber did not comply with the regulations.

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73) Y/N/NA RMK #

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) which contains the following information:

   a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] N

   b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?

   c. The estimated (or actual) weight, volume or density of the waste material?

   d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745?

   e. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?

   f. Records of incidents which required implementation of the Contingency Plan?

   g. Records of any waste analyses and trial tests required to be performed?

   h. Records of the inspections required under the General Inspection Requirements under 3745-65-15?

   i. Records of any monitoring, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6)?

   j. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B)(2)]

   k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

NOTE: THE FOLLOWING RECORDKEEPING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

	Y/N/NA	RMK #
2. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]	N/A	
3. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]		
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?		
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?		
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?		
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?		

REMARKS - OPERATING RECORD REQUIREMENTS

Hogg Lumber acted as an illegal TSD; therefore, did not comply w/ the regulations

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

	Y/N/NA	RMK #
1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A)(1)(2)] If so,	N	
a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]		
b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]		
c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]		
2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,		
a. Is the schedule kept at the facility? [3745-65-15(B)(2)]		
b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B)(3)]		
c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B)(4)]		

REMARKS - GENERAL INSPECTION REQUIREMENTS

Stage Number acted as an illegal TSD and did not follow inspection requirements.

SECURITY REQUIREMENTS (OAC 3745-65-14)	Y/N/NA	RMK #
1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]	Y	
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]	Y	

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -		
a. A 24-hour surveillance system, or;	N	
b. An artificial or natural barrier <u>and</u> a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]	N	
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]	N	

REMARKS - SECURITY REQUIREMENTS

Stockpile number is in violation & must adhere to the security requirements.

PERSONNEL TRAINING (OAC 3745-65-16) Y/N/NA RMK #

1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A)(4)] N #1

2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A)(4)] NA #2

3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A)(4)] NA #3

4. Does the generator keep all the records required by 3745-65-16(D)(E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] N #4

REMARKS - PERSONNEL TRAINING REQUIREMENTS

#1 All personnel handling hazardous waste must be trained accordingly.

#2 When new employees are hired Hoge Lumber understands their responsibility to train them w/in 6 mos.

#3 It has not been 12 mos. since the last training course. Hoge Lumber has said that they will provide annual refresher courses.

#4 The generator has failed to keep required records. The o/o shall maintain the following documents at the facility: a job title & employee name for each position related to hazardous waste; a written job description includ requisite skill, education, or other qualifications & duties of a position related to hazardous waste; detailed description of training; documentation of the above; and records of past training etc. See OAC 3745-65-16 (D)(E) for details.

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE WASTES (OAC 3745-65-17)

Y/N/NA RMK #

1. If ignitable, reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17]

   a. Wastes are protected from sources of ignition and/or reaction? N #1

   b. Physical separation of incompatible waste materials? N/A

   c. "No Smoking" or "No Open Flames" signs are placed near areas where ignitable or reactive wastes are handled? N #2

   d. Commingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B)? N/A

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

#1 In the past Brooj Lumber has illegally dumped + burned waste solvents.

#2 No smoking signs must be placed wherever there is a hazard from ignitable or reactive wastes.

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)	Y/N/NA	RMK #
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]	Y	
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?	Y	
a. If yes, was the contingency plan implemented? [3745-65-51(B)]	Y	
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]		
a. Internal alarm system?	Y	
b. Access to telephone, radio or other device for summoning emergency assistance?	N	#1
c. Portable fire control equipment, spill control and decontamination equipment?	Y	
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]	Y	
a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs?	N	#2
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]	N	#1
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]	Y	
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]	Y	#3

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [OAC 3745-65-37(B)] NA

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

#1 A telephone should be immediately available at the scene of operations with a posting of emergency phone numbers.

#2 At a minimum these records shall include the date + time of the test, the name of the person performing the test, a notation of the observations made, and the date + nature of any repairs or other remedial action

#3 Primary Police + Fire Depts. should be designated w/ other responding depts. acting as support. Arrangements should be made w/ OEPA emergency response team, emergency response contractors + equipment suppliers. Arrangements should be made to familiarize local hospitals w/ the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or spills of hazardous waste. Mutual aid agreements w/ local authorities should be documented

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56) Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan which contains the following? [3745-65-52(A)(B)(C)(D)(E)]:

   a. Actions to be taken by personnel in the event of an emergency incident? Y ____

   b. Arrangements or agreements with local or state emergency authorities? Y #1

   c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y #2

   d. A list of all emergency equipment including location, physical description and outline of capabilities? N #3

   e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]? Y #4

2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)] Y ____

3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)] Y #1

4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] N/A #5

5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55] Y ____

#1 The contingency plan should contain all signed document from all emergency authorities involved showing that the emergency authorities have a copy of the plan and understand their role.

#2 The ~~Emergency~~ Asst. Emergency Response Coordinator should be listed in order in which they will assume responsibility.

- The plan should show a map of the facility locating the P.A. System, spill containment equipment, decontamination equipment, + fire hose

#4 The evacuation plan should include alternate evacuation routes to be used when primary routes are blocked and signals used to begin evacuation

#5 This is the 1st contingency plan. The plan states that changes etc. will be documented.

	Y/N/NA	RMK #
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?	Y	

REMARKS - CONTINGENCY PLAN REQUIREMENTS

OAC 3745-66 CLOSURE AND POST CLOSURE

	Y/N/NA	RMK #
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?	N	
a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?		
b. A description of how final closure will meet the requirements of 3745-66-11?		
c. An estimate of the maximum amount of hazardous waste ever in inventory?		
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?		
e. The year closure is expected to begin and a schedule for the various phases of closure?		
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?		
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]		
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]		
4. Has the closure plan (and post-closure plan, if applicable) for tank, container storage or incinerator units been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]		
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]		
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]		
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]		

	Y/N/NA	RMK #
8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16?	N	
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?		
10. If closure was partial, list the regulated units which remain in use at the faciilty:		
11. If required, has the facility prepared a written post-closure plan? [3745-66-18]		
If so, does the post-closure plan include:		
a. A description of proposed ground water monitoring?		
b. A description of planned maintenance activities?		
c. The name, address and phone number of person/office to contact during the post-closure period?		
12. **For disposal facilities;** has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]		
13. Has the owner of the property <u>on which a disposal unit is located</u> recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?		
b. Land use is restricted under closure and post-closure rules? [3745-66-19]		

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

Hoge Lumber is required to submit a closure plan for the area where solvents were illegally dumped + burned. However, a closure plan has not yet been submitted. Hoge Lumber has removed some contaminated soil from the area and intends to submit a closure plan to the OEPA.

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)	Y/N/NA	RMK #
1. Are hazardous wastes stored in containers which are:		
a. Closed? [3745-66-73(A)]	N	#1
b. In good condition? [3745-66-71]	Y	
c. Compatible with wastes stored in them? [3745-66-72]	Y	
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]	N	#1
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]	N	#2
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]	Y	
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:		
a. Date and time of inspections?	Y	
b. Name of inspector?	Y	
c. Notation of observations made during the inspection?	N	#3
d. The date and nature of any repairs or other remedial action?	N	#3
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,	Y	
a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Y	
b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]	Y	

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

#1 A container holding hazardous waste shall always be closed. Therefore the satellite accumulation containers must be closed at all times except when adding waste. If the O/O would like to use funnels, the OEPA recommends funnels w/ automatic closing lids.

#2 The drums located at the outside hazardous waste storage area was found open + unlab

#3 The Inspection Log shall include the date + time of the inspection, the name of the inspector, a notation of the observations made, and the date + nature of any repairs or remedial action. The Inspection Log records should be kept for at least 3 yrs.

OAC 3745-67 TREATMENT OR STORAGE IN WASTE PILES

1. Are waste materials subject to dispersal by wind adequately protected against such dispersal? [3745-67-51] — N — #1

2. If leachate or run-off from a Waste Pile is a hazardous waste, have the following steps been taken to prevent or properly manage the run-off: [3745-67-53]

   a. (1) The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage? and; — N — #2

   (2) A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented? and; — N

   (3) A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented? and; — N

   (4) Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event? — N

   OR;

   b. (1) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff? and; — N

   (2) No liquids or wastes containing free liquids are placed in the pile? — NA — #3

3. Before new waste materials are added to an existing waste pile, is it first ascertained that the material is compatible with the existing waste through appropriate laboratory testing? [3745-67-52] — N/A — #3

   Are the results of the analysis maintained in the facility's operating record as required by 3745-65-13? [3745-67-52] — Y

4. Before ignitable or reactive wastes are placed in waste piles are one or both of the following met: [3745-67-56]

   a. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and the activity was conducted in compliance with the safety requirements of 3745-65-17? — NA — #3

   b. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction? — NA — #3

	Y/N/NA	RMK #
5. Is the waste pile separated or protected from any incompatible materials which may be stored nearby? [3745-67-57(B)]	Y	
6. At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste?	NA	#4

NOTE: If all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted. [3745-67-58]

REMARKS - WASTE PILE REQUIREMENTS

#1 The area where solvents were burned should be covered or otherwise ~~contained~~ managed so that wind dispersal is controlled.

#2 Steps 2a.1-4 and step b.2 should be taken to controll ground water runoff.

#3 The o/o has ceased operation of the waste pile.

#4 Some of the soil from the site has been removed + disposed of as hazardous waste. The OEPA/WLDO is awaiting a closure plan

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Hoge Lumber Company

U.S. EPA ID No.: OHD 005 045 729

Street: 700 South Main St.

City: New Knoxville Auglaize Co. State: OH Zip: 45871

Telephone: (419) 753-2263

Inspection Date: 7/23/91 Time: 10:15 - 12:00 (am/pm)

Weather Conditions: 85-90°F, Humid, Sunny

	Name	Agency/Title	Telephone
Inspectors:	Maryann Seghy	OEPA/NWDO/DSHWM	352-8461
	Beth Ames	OEPA/NWDO/DSHWM	"
Facility Representatives:	Jeff Steers	"	"
	Clark Fronning	V.P. Hoge Lumber	753-2263

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	✓		✓	✓	✓
F020-F023 and F026-F028					
California List*					
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]					

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Cleaning paint spray gun
Quenching Water Procedures

LDR Waste Management:

Summary:

Signature:

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
   F001 - F005

2. F020-F023 and F026-F028 dioxin-containing wastes:
   _____

3. California List Wastes (See Appendix A):
   _____

4. First Third Wastes [40 CFR 268.10]:
   _____

5. Second Third Wastes [40 CFR 268.11]:
   _____

6. Third Third Wastes [40 CFR 268.12]**:
   _____

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes ✓ No ___

   If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

   Yes ✓ No ___ NA ___

   Comments_____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

   Yes ___ No ___ NA ✓

   *Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

   If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

   Yes ___ No ___

   Comments_____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

   Yes ✓ No ___ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

   Yes ___ No ✓ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

   Yes ___ No ✓ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

   Yes___ No ✓ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

   Yes ___ No ✓ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

ARTER & HADDEN

One Columbus
10 West Broad Street
Columbus, Ohio 43215
614/221-3155
Telecopier 614/221-0479

September 20, 1990

RECEIVED
SEP 25 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604

Attention: Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Re: Hoge Lumber Company

Dear Mr. Pierard:

We are writing to you in response to your request for information of August 27, 1990 to Hoge Lumber Company in New Knoxville, Ohio. We have been retained to represent the legal interests of the Hoge Lumber Company in regards to the Ohio EPA investigation to which you referred. Enclosed herewith you will find a copy of correspondence which we forwarded to representatives of the Ohio EPA when they began their investigation. Since this matter is currently under a criminal investigation, and a criminal prosecution appears likely, we are duty bound to protect and safeguard our client's constitutional rights. We have advised the Ohio EPA of this same concern, but we have cooperated to the full extent possible given the potential criminal ramifications in this matter.

Hoge Lumber is now collecting spent solvent from its cabinet finishing process and transporting it to a properly licensed hazardous waste facility by a properly licensed transporter.

If you have any further questions, please feel free to contact the undersigned.

Very truly yours,

ARTER & HADDEN

John P. Gartland

John P. Gartland

JPG845/npf
Enclosure

IN CLEVELAND
ARTER & HADDEN
1100 Huntington Building
Cleveland, Ohio 44115
216/696-1100

IN DALLAS
ARTER & HADDEN
1717 Main Street, Suite 4100
Dallas, Texas 75201
214/761-2100

IN LOS ANGELES
ARTER, HADDEN,
LAWLER, FELIX & HALL
700 South Flower Street
Los Angeles, California 90017
213/629-9300

IN WASHINGTON, D.C.
ARTER & HADDEN
1919 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
202/775-7100

ARTER & HADDEN

IN CLEVELAND
ARTER & HADDEN
1100 HUNTINGTON BUILDING
CLEVELAND, OHIO 44115
216/696-1100
TELECOPIER 216/696-2645
TELEX 98 5364

ONE COLUMBUS
10 WEST BROAD STREET
COLUMBUS, OHIO 43215
614/221-3155
TELECOPIER 614/221-0479

IN WASHINGTON
ARTER & HADDEN
1919 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
202/775-7100
TELECOPIER 202/857-0172
TELEX 6502156242-MCI

IN DALLAS
ARTER & HADDEN
1717 MAIN STREET
SUITE 4100
DALLAS, TEXAS 75201
214/761-2100
TELECOPIER 214/741-7139

PLEASE RESPOND TO:

Columbus

June 1, 1990

Mr. Mike Hayes
Mr. Tehmton Toorkey
Division of Solid and
Hazardous Waste Management
Ohio EPA
1035 Devlac Grove Drive
Bowling Green, Ohio 43402-4598

Re: Hoge Lumber Company

Dear Mr. Hayes and Mr. Toorkey:

We have been retained to represent the legal interests of the Hoge Lumber Company in regards to the Ohio EPA investigation of that company. We recently received your correspondence of May 18, 1990 to Hoge Lumber Company and we will be responding once we have had the opportunity to gather more information.

We understand that the Ohio EPA has already conducted several inspections, and obtained numerous samples pursuant to its legal authority under Chapter 3734.01 et seq. and 6111.01 et seq. of the Ohio Revised Code. We also understand that Ohio EPA representatives gave specific orders and directions to representatives of Hoge Lumber Company pending the results of laboratory testing of samples taken. Hoge Lumber has complied with all orders and directions of the Ohio EPA, and will continue to comply with all legal requirements mandated by applicable statutes and regulations.

We will be coordinating the investigation and the resolution of any potential environmental problems and look forward to working with you. We will also make sure that all of our client's constitutional rights are protected and preserved.

Please call the undersigned at your earliest convenience to discuss these matters further.

Very truly yours,

ARTER & HADDEN

John P. Gartland

John P. Gartland

JPG679/npf

HC

RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: Hoge Lumber Company

USEPA I.D.: OHD 005 045 729 HWFB No.: _____

Street: 700 South Main St.

City: New Knoxville State: OH Zip: 45871

County: Auglaize Telphone: (419) 753-2263

Owner/Operator: _____

Street: _____

City: _____ State: _____ Zip: _____

Telephone: _____

Inspection Date: 05/07/92 Time: 9:45 - 12:30

Advance notice of inspection given? (yes) ____ (no) ✓
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspectors:	Beth Ames	OEPA/ESO	(419) 352-8461
	John Schierberl	OEPA/ESO	(614) 644-2955
Facility Representative:	John Hoge	Owner	(419) 753-2263
	Clark Froning	Personnel	"
	Joe Niekamp	Haz. Mat. Technician	"

STATUS

Cond. Exempt SQG ___ SQG ✓ Large Quantity Generator ___
LDR Checklist Attached: (yes) ✓ (no) ____ TSD ✓

ACTIVITIES

Containers ✓
Tanks ___
Wastepile ✓
Landfill ___
Surface Impoundment ___
Disposal ✓

Used oil burner ___
Hazardous waste fuel burner/blender ___
Incineration/Thermal treatment ___
Land treatment ___
Groundwater monitoring ___

Revised: 1/7/91

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handing procedures:

Hoge Lumber is a facility which cuts lumber and builds wood cabinetry, floors, etc. Hazardous waste is generated from painting and varnishing processes. These wastes include D001/F005 spent solvent, D001/F003 misc. paint related waste and F003/F005 quenching water. The quenching water waste is in the process of being changed to a non-haz. waste. An exempt laquer thinner is being used which will characterize the next shipment as non-haz.

In the past, Hoge has disposed of solvents to the ground in the burn pile area and outside of the cabinet shop door. Quenchin water was also disposed of to the ground outside of the varnish area via a pipe through the wall. Solvents were burned on burn pile of solid waste.

The facility is currently under enforcement with the Ohio Attorney General's office for these past activities.

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

   (yes) _____ (no) _____

   If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the **Conditionally Exempt Small Quantity Generator Requirements** checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

   (yes) ✓ (no) _____

   If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the **Small Quantity Generator Requirements** checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

   OR;

   b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

   (yes) _____ (no) _____

   If so, the facility is classified as a Large Quantity Generator. Please complete the **Large Quantity Generator Requirements** checklist.

REMARKS - GENERATOR CLASSIFICATION

FACILITY INSPECTION
WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE			ON SITE MANAGEMENT											OFF SITE MANAGEMENT	
EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR			TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLED	CONTAINER	IMPOUNDMENT	TANK	WASTE PILE	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT	DISPOSAL FACILITY
			LESS THAN 90 DAYS	LESS THAN 180 DAYS	LESS THAN 270 DAYS										
F005 D001	18.3	Cabinet Shop Solvent and clean up	✓			*						*		Incinerated by Safety Kleen	
F003 D001	1 drum / year	Cabinet Shop Solids	✓			*						*		Incinerated by Safety Kleen	

* Past management practices - this waste was also disposed to the ground

PERMIT STATUS

	Y/N/NA	RMK#
1. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	N	1
When was the facility's Part A submitted: _____		
2. Is the facility operating in compliance with the terms conditions of its HWFB permit?	NA	
If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?	NA	
If yes, what date was the PCR submitted? _____		
3. Has the facility submitted a Part B?	NA	

REMARKS - PERMIT STATUS

Facility has treated, stored + disposed of hazardous waste without filing a Part A permit.

SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

	Y/N/NA	RMK #
WASTE EVALUATION (OAC 3745-52-11)		
1. Have the wastes generated at the facility been evaluated as required under 3745-52-11? If not, please specify those waste(s) which the SQG has failed to provide an adequate evaluation of:	Y	
GENERATOR CLASSIFICATION		
2. Do quantities of hazardous waste accumulated on-site ever exceed 6000 kgs? (If so, TSD standards apply. Complete applicable TSD checklists.) [3745-52-34(D) and (F)]	N	
GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)		
3. Has the generator obtained a U.S. EPA identification number as required under 3745-52-12 prior to treating, storing, disposing, transporting or offering hazardous waste for transport?	Y	
MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)		
4. Are waste streams generated at the facility being shipped off-site under a contractual agreement as defined in OAC 3745-52-20(F)? If not, the generator is subject to manifest requirements of OAC 3745-52-20 through 3745-52-23. Please complete the <u>Manifest Requirements</u> checklist to document compliance with these requirements.	Y	

SQG - EMERGENCY PROCEDURES/PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)	Y/N/NA	RMK #
5. Is an emergency coordinator available at all times? [3745-52-34(D)(5)(a)]	Y	
6. Has the following information been posted by the telephone? [3745-52-34(D)(5)(b)]:		
a. Name and telephone number of emergency coordinator?	NA	
b. Location of fire and spill control equipment?	NA	
c. Telephone number of local fire department?	NA	
7. Have emergencies been reported to the National Response Center? [3745-52-34(D)(5)(d)]	NA	
8. Are all employees thoroughly familiar with proper handling and emergency procedures? [3745-52-34(D)(5)(c)]	Y	

In addition to the above, the small quantity generator must comply with the "Preparedness and Prevention" requirements of OAC 3745-65-30 through 3745-65-37. Please complete the Preparedness and Prevention checklist to document compliance with these requirements.

SQG - ACCUMULATION OF HAZARDOUS WASTES (OAC 3745-52-34)	Y/N/NA	RMK #
9. Is the generator accumulating hazardous wastes in containers? If so,	Y	
a. Is the date accumulation began clearly marked on each container [3745-52-34(A)(2)]?	Y	
b. Is each container clearly marked with the words "Hazardous Waste" [3745-52-34(A)(2)]?	Y	

In addition to the above, if the generator is accumulating hazardous waste in containers, please complete the Management of Containers checklist.

10. Is the generator accumulating hazardous wastes in tanks?	N	
a. If so, is each tank clearly marked with the words "Hazardous Waste" [3745-52-34(A)(2)]?	NA	

In addition to the above, if the generator is accumulating hazardous waste(s) in tanks, please complete the Accumulation in Tanks for SQG's checklist.

	Y/N/NA	RMK #
11. Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)]	N	
a. If so, has the generator been granted an extension by the Director for accumulation in excess of 180 days?	NA	

REMARKS - SMALL QUANTITY GENERATOR REQUIREMENTS

#1 - Facility is operating under a contingency plan as a TSD

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation) Y ____

   If so, are the following requirements of OAC 3745-52-34(C) being met:

   a. Quantities of waste accumulated do not exceed 55 gallons at any time? Y ____
   b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? NA ____
   c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container? Y ____

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b? N ____

   a. If so, did the generator comply with 3745-52-34(A) within three (3) days? **and;** NA ____

   b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating? NA ____

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)	Y/N/NA	RMK #
1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:		
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20(A)?	Y	
b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?	Y	
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E)?	Y	
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A)(1)(2)?	Y	
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?	Y	
a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42?	NA	
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?	Y	

REMARKS - MANIFEST REQUIREMENTS

Y/N/NA RMK #

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE WASTES (OAC 3745-65-17)

1. If ignitable, reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17]

   a. Wastes are protected from sources of ignition and/or reaction? Y ____

   b. Physical separation of incompatible waste materials? NA ____

   c. "No Smoking" or "No Open Flames" signs are placed near areas where ignitable or reactive wastes are handled? Y ____

   d. Commingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B)? NA ____

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77) Y/N/NA RMK #

1. Are hazardous wastes stored in containers which are: Y ____
   a. Closed? [3745-66-73(A)] Y ____
   b. In good condition? [3745-66-71] Y ____
   c. Compatible with wastes stored in them? [3745-66-72]

2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] Y ____

3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] Y ____

4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] Y ____

5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information: Y ____
   a. Date and time of inspections? Y ____
   b. Name of inspector? Y ____
   c. Notation of observations made during the inspection? Y ____
   d. The date and nature of any repairs or other remedial action?

6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so, Y ____
   a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Y ____
   b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Y ____

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)	Y/N/NA	RMK #
1. Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]	Y	
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?	N	
a. If yes, was the contingency plan implemented? [3745-65-51(B)]	NA	
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]		
a. Internal alarm system?	Y	
b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
c. Portable fire control equipment, spill control and decontamination equipment?	Y	
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]	Y	
a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs?	Y	
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device? [3745-65-34]	Y	
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]	Y	
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]	Y	

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [OAC 3745-65-37(B)] NA

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56) Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan which contains the following? [3745-65-52(A)(B)(C)(D)(E)]:

   a. Actions to be taken by personnel in the event of an emergency incident? Y ____

   b. Arrangements or agreements with local or state emergency authorities? Y ____

   c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y ____

   d. A list of all emergency equipment including location, physical description and outline of capabilities? Y ____

   e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]? Y ____

2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)] Y ____

3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)] Y ____

4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y ____

5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55] Y ____

	Y/N/NA	RMK #
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?	Y	

REMARKS - CONTINGENCY PLAN REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

	Y/N/NA	RMK #
1. Does the facility provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan?	Y	
2. Does the facility provide Personnel Training to new employees within 6 months after the date of their employment as required by 3745-65-16(B)?	N/A	#1
3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)?	Y	
4. Does the facility keep all of the records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records?	Y	

REMARKS - PERSONNEL TRAINING

1 stable work force, no new employees, rotation scheduling to utilize employees in fluctuating business-level environment.

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

	Y/N/NA	RMK #
IDENTIFICATION NUMBER (OAC 3745-65-11)		
1. Has the facility owner/operator notified U.S. EPA of hazardous waste activity and obtained a U.S. EPA identification number [OAC 3745-65-11]?	Y	
ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)		
2. Has the owner/operator submitted an annual Treatment-Storage-Disposal Operating Report to the Director of the Ohio EPA by March 1st of each calendar year? [3745-65-75]	N	
WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)		
3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A)(1)?	N	
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A)(3)(a)]	NA	
5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13(A)(4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A)(3)(b)]	NA	
6. Does o/o have a written waste analysis plan which includes the following information [OAC 3745-65-13(B)(1) through (6)]:		
a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B)(1)	N	
b. The test methods to be used? [3745-65-13(B)(2]	N	
c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13(B)(3)(a)(b)]	N	
d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B)(4)]	N	

	Y/N/NA	RMK #
e. **FOR OFF-SITE FACILITIES:** The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B)(5)]	NA	
f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)?	NA	
g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):**	NA	
Does the waste analysis plan include procedures and schedules for:		
i. The sampling of impoundment contents? [3745-65-13(B)(7)]		
ii. The analysis of test data? [3745-65-13(B)(7)]		
iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13-(7)		
h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]		

REMARKS - WASTE ANALYSIS REQUIREMENTS

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73) Y/N/NA RMK #

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) which contains the following information:

   a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] N

   b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?

   c. The estimated (or actual) weight, volume or density of the waste material?

   d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745?

   e. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?

   f. Records of incidents which required implementation of the Contingency Plan?

   g. Records of any waste analyses and trial tests required to be performed?

   h. Records of the inspections required under the General Inspection Requirements under 3745-65-15?

   i. Records of any monitoring, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6)?

   j. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B)(2)]

   k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

NOTE: THE FOLLOWING RECORDKEEPING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

	Y/N/NA	RMK #
2. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]	NA	
3. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]		
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?		
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?		
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?		
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?		

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

	Y/N/NA	RMK #
1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A)(1)(2)] If so,	Y	
a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]	Y	
b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]	Y	
c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]	Y	
2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,	Y	
a. Is the schedule kept at the facility? [3745-65-15(B)(2)]	Y	
b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B)(3)]	Y	
c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B)(4)]	Y	

REMARKS - GENERAL INSPECTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)	Y/N/NA	RMK #
1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]	Y	
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]	Y	

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -		
a. A 24-hour surveillance system, or;	N	
b. An artificial or natural barrier <u>and</u> a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]	Y	1
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]	Y	

REMARKS - SECURITY REQUIREMENTS

#1 - Lock cabinets

OAC 3745-66 CLOSURE AND POST CLOSURE

	Y/N/NA	RMK #
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?	N	
a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?		
b. A description of how final closure will meet the requirements of 3745-66-11?		
c. An estimate of the maximum amount of hazardous waste ever in inventory?		
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?		
e. The year closure is expected to begin and a schedule for the various phases of closure?		
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?		
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]	NA	
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]	NA	
4. Has the closure plan (and post-closure plan, if applicable) for tank, container storage or incinerator units been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]	NA	
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]	NA	
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]	NA	
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]	NA	

	Y/N/NA	RMK #
8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16?	NA	
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?		
10. If closure was partial, list the regulated units which remain in use at the faciilty:		
11. If required, has the facility prepared a written post-closure plan? [3745-66-18]	N	
If so, does the post-closure plan include:		
a. A description of proposed ground water monitoring?		
b. A description of planned maintenance activities?		
c. The name, address and phone number of person/office to contact during the post-closure period?		
12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]	NA	
13. Has the owner of the property on which a disposal unit is located recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?	NA	
b. Land use is restricted under closure and post-closure rules? [3745-66-19]	NA	

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

OAC CHAPTER 3745-59 (40 CFR PART 268) - LDR GENERAL REQUIREMENTS

Y/N/NA RMK#

CASE-BY-CASE EXTENSIONS

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA in accordance with O.A.C. Rule 3745-59-05 (40 CFR 268.5)? If yes, N ____

   (a) List the waste(s) affected:

   (b) Has such an extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)] NA ____

   (c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from an LDR treatment standard by US EPA as allowed by O.A.C. Rule 3745-59-44 (40 CFR 268.44)? If yes, N ____

   (a) List the waste(s) affected:

   (b) Has the petition been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)] NA ____

NOTE: Until the extension or variance identified in Questions 1 or 2 has been recognized by the Director of the Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements. [See O.A.C. Rules 3745-59-05(C) and 3745-59-44(C)]

Y/N/NA RMK#

NO MIGRATION PETITION

3. Has the entity petitioned US EPA for a variance to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit as specified in O.A.C. Rule 3745-59-06 (40 CFR 268.6)? N ____
If yes,

(a) List the waste(s) affected:

(b) Has the entity's "no migration" demonstration been approved by US EPA? NA ____

NOTE: Until receiving approval of the petition by US EPA, the entity must comply with all LDR requirements applicable to the petitioned waste(s). No approval or recognition of the petition by the Director of the Ohio EPA is required. [O.A.C. Rule 3745-59-06; 40 CFR 268.6]

PROHIBITION AGAINST DILUTION

4. In compliance with O.A.C. Rule 3745-59-03 (40 CFR 268.3), does the entity prohibit the dilution of a restricted waste or treatment residue from a restricted waste:

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards? Y ____

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? Y ____

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-33? (40 CFR 268.30 through 268.33) Y ____

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA? Y ____

NOTE: Dilution of wastes is permissible under the following conditions:

i. The entity dilutes a characteristic only hazardous waste in a wastewater treatment system which treats wastes subsequently discharged pursuant to a permit issued under section 402 of Clean Water Act or which treats wastes for purposes of pretreatment under section 307 of the Clean Water Act; and,

ii. No other method of treatment has been specified as the treatment standard for the waste. (See 40 CFR 268.3)

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(C)(3) (40 CFR 261.8(e)(1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS	Y/N/NA	RMK#
1. Has the generator adequately evaluated all wastes generated to determine if the wastes are restricted from land disposal under O.A.C. Chapter 3745-59 (40 CFR Part 268)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
(a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
(b) For determinations based upon analytical testing of the waste: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)?	Y	
3. Has the generator determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	

REMARKS

	Y/N/NA	RMK#
4. Does the generator generate waste mixtures that are subject to two or more different treatment standards? If so,	N	
(a) For mixed waste streams containing two or more concentration based treatment standards: Has the generator applied the more stringent treatment standard as the treatment standard for the mixture? [O.A.C. Rules 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]	NA	
5. Does the facility generate any listed waste(s) which are restricted from land disposal? If so,	Y	
(a) Do such wastes also exhibit hazardous waste characteristics as identified in 40 CFR 262.11?	Y	
(b) For listed wastes which also exhibit characteristic(s), does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [40 CFR 268.9]	NA	Some characteristics as listing

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

6. Does the generator treat any characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous? If so,	N	
(a) Are treated waste(s) sent to a licensed solid waste disposal facility? If so,	NA	
i. With each shipment of waste, does the generator submit a notification and certification to the Regional Administrator which contains the following information:		
a. Name and address of the solid waste facility receiving the waste? [40 CFR 268.9(d)(1)(i)]	NA	
b. A description of the waste as initially generated, including EPA hazardous waste numbers and the treatability group? [40 CFR 268.9(d)(1)(ii)]	NA	
c. The treatment standards applicable at the initial point of generation? [40 CFR 268.9(d)(1)(iii)]	NA	
ii. Is the certification signed by an authorized representative and does it contain the language in 40 CFR 268.7(b)(5)(i)? [40 CFR 268.9(d)(2)]	NA	

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

	Y/N/NA	RMK#
NOTIFICATION/CERTIFICATION		
7. For wastes that do not meet treatment standards: Does the generator notify the treatment or storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]	Y	
(a) Is such notification provided with each shipment of waste? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]	Y	
(b) Does the notification contain the following information:		
i. EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(1)(a); 40 CFR 268.7(a)(1)(i)]	Y	
ii. Appropriate treatment standard for each waste? [O.A.C. Rule 3745-59-07(A)(1)(b); 40 CFR 268.7(a)(1)(ii)]	Y	
iii. The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(1)(c); 40 CFR 268.7(a)(1)(iii)]	Y	
iv. Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d); 40 CFR 268.7(a)(1)(iv)]	Y	
8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the waste stating that the wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A)(2); 40 CFR 268.7(a)(2)]	NA	
If so, does the notice include the following information:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(2)(a)(i); 40 CFR 268.7(a)(2)(i)(A)]		
(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(ii); 40 CFR 268.7(a)(2)(i)(B)]		
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(iii); 40 CFR 268.7(a)(2)(i)(C)]		
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(2)(a)(iv); 40 CFR 268.7(a)(2)(i)(D)]		
(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A)(2)(b); 40 CFR 268.7(a)(2)(ii)]	✓	

	Y/N/NA	RMK#
9. For wastes subject to a case-by-case extension, an exemption or a variance: Does the generator provide a written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07(A)(3); 40 CFR 268.7(a)(3)]	NA	
If so, does the notice contain the following information:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(3)(a); 40 CFR 268.7(a)(3)(i)]		
(b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(b); 40 CFR 268.7(a)(3)(ii)]		
(c) The manifest number associated with the shipment of waste? [O.A.C. 3745-59-07(A)(3)(c); 40 CFR 268.7(a)(3)(iii)]		
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(3)(d); 40 CFR 268.7(a)(3)(iv)]		
(e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(e); 40 CFR 268.7(a)(3)(v)]		
10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [3745-59-07(A)(6); 40 CFR 268.7(a)(6)]		

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

	Y/N/NA	RMK#
REQUIRED TREATMENT		
1. Does the facility treat any restricted wastes for which a treatment standard based upon a treatment technology has been established?	N	1
(a) If so, is the facility using the appropriate treatment technology as specified in O.A.C. 3745-59-42 (40 CFR 268.42)?	NA	
(b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [3745-59-42(B) and 40 CFR 268.42(b)]	NA	
2. Does the facility treat restricted wastes for which a concentration based treatment standard has been established?	Y	
If so, does the treatment facility test its waste treatment residues according to the following requirements:		
(a) For wastes with treatment standards expressed as a concentration in the waste extract (OAC 3745-59-41; 40 CFR 268.41):		
Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [3745-59-07(B)(1); 268.7(b)(1)]	N	
(b) For wastes with treatment standards expressed as concentrations in the waste (OAC 3745-59-43; 40 CFR 268.43):		
Does the treatment facility test the treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [3745-59-07(B)(3); 40 CFR 268.7(b)(3)]	NA	

NOTE: A treatment facility may use any treatment method available (except impermissible dilution) to treat restricted wastes which have concentration based treatment standards (unless the waste is a mixture which includes wastes with concentration based treatment standards and technology based treatment standards - in which case the technology based treatment standard must be used).

#1- In the past the facility treated solvent waste on a burn pile.

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.	Y/N/NA	RMK#
3. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?	N	
If so, does the treatment facility provide the land disposal facility with a written notice containing the following information:		
(a) EPA hazardous waste number? [3745-59-07(B)(4)(a); 268.7(b)(4)(i)]	NA	
(b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B)(4)(b); 268.7(b)(4)(ii)]		
(c) The manifest number associated with the shipment of waste? [3745-59-07(B)(4)(c); 268.7(b)(4)(iii)]		
(d) Waste analysis data, where available? [3745-59-07(B)(4)(d); 268.7(b)(4)(iv)]		
4. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,	N	
For wastes and/or treatment residues which have been generated from treatment of a waste which has a concentration based treatment standard:		
(a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [3745-59-07(B)(5); 268.7(b)(5)]	NA	
(b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B)(5)(a); 40 CFR 268.7(b)(5)(i)]		
For wastes and/or treatment residues which have been generated from treatment of a waste which has a technology based treatment standard:		
(c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the residue has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42) [3745-59-07(B)(5)(b); 40 CFR 268.7(b)(5)(ii)]		
(d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. 3745-59-07(5)(b)(ii) (40 CFR (b)(5)(ii))?		

	Y/N/NA	RMK#
5. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,		
(a) Is the facility complying with the generator notification and certification requirements of O.A.C. Rule 3745-59-07 (40 CFR 268.7)? [3745-59-07(B)(6); 268.7(b)(6)]	N	

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE (40 CFR 268.9)

6. Does the facility treat any characteristic hazardous waste(s) to render such wastes non-hazardous? If so,	N	
(a) Are treated waste(s) sent to a licensed solid waste disposal facility? If so,	NA	
i. With each shipment of waste, does the facility submit a notification and certification to the Regional Administrator which contains the following information:		
a. Name and address of the solid waste facility receiving the waste? [40 CFR 268.9(d)(1)(i)]		
b. A description of the waste as initially generated, including EPA hazardous waste numbers and the treatability group? [40 CFR 268.9(d)(1)(ii)]		
c. The treatment standards applicable at the initial point of generation? [40 CFR 268.9(d)(1)(iii)]		
(b) Is the certification signed by an authorized facility representative and does it contain the language found in 40 CFR 268.7(b)(5)(i)? [40 CFR 268.9(d)(2)]		

REMARKS

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

	Y/N/NA	RMK#
1. Does the land disposal facility retain copies of notices and certifications required by O.A.C. Rule 3745-59-07(A) or (B) (40 CFR 268.8(a) or (b)) and O.A.C. Rule 3745-59-08 (40 CFR 268.8)? [O.A.C. Rule 3745-59-07(C)(1); 40 CFR 268.7(c)(1)]	N	
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the facility's waste analysis plan to assure that the wastes or treatment residues are in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]	N	
3. Does the land disposal facility prohibit the disposal of restricted wastes or treatment residues which exceed the concentration based treatment standards of O.A.C. Rules 3745-59-41 (40 CFR 268.41) or 3745-59-43 (40 CFR 268.43)? [O.A.C. Rule 3745-59-40(A),(C); 40 CFR 268.40(a),(c)]	N	
4. Does the land disposal facility prohibit the disposal of any restricted wastes or treatment residues before such wastes have been treated using the technology required by O.A.C. Rule 3745-59-42(A) (40 CFR 268.42(a))? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]	NA	

REMARKS

TREATMENT OF LDR WASTES IN SURFACE IMPOUNDMENTS

	Y/N/NA	RMK#
1. Does the owner/operator treat wastes which are prohibited from land disposal in a surface impoundment or series of impoundments? If so, are the following conditions met:	NA	
(a) The residues from treatment are analyzed to determine if they meet applicable treatment standards? [O.A.C. Rule 3745-59-04(A)(2)(a); 40 CFR 268.4(a)(2)(i)]		
(b) The sampling method is designed so that representative samples of the sludge and the supernatant are tested separately rather than mixed to form homogeneous samples? [O.A.C. Rule 3745-59-04(A)(2)(a); 40 CFR 268.4(a)(2)(i)]		
(c) Treatment residues (including any liquid waste) which do not meet treatment standards or prohibition levels are removed from the impoundment at least annually? [O.A.C. Rule 3745-59-04(A)(2)(b); 40 CFR 268.4(a)(2)(ii)]		
i. Such residues are not placed in any other surface impoundment? [O.A.C. Rule 3745-59-04(A)(2)(c); 40 CFR 268.4(a)(2)(iii)]		
(d) Procedures and schedules for sampling the impoundment contents, analysis of test data and removal of residues which do not meet treatment standards have been established? [O.A.C. Rule 3745-59-04(A)(2)(d); 40 CFR 268.4(a)(2)(iv)]		
i. Such procedures and schedules are specified in the facility's waste analysis plan as required by O.A.C. Rules 3745-65-13 (40 CFR 265.13) or 3745-54-13 (40 CFR 264.13)? [O.A.C. Rule 3745-59-04(A)(2)(d); 40 CFR 268.4(a)(2)(iv)]		
ii. A copy of the waste analysis plan has been submitted to the Director? [O.A.C. Rule 3745-59-04(A)(4); 40 CFR 268.4(a)(4)]		
(e) The impoundment meets the design requirements of O.A.C. Rule 3745-56-21(C) (40 CFR 264.221(c)) or 3745-67-21(A) (40 CFR 265.221(a))? [O.A.C. Rule 3745-59-04(A)(3); 40 CFR 268.4(a)(3)]		
(f) The impoundment meets groundwater monitoring requirements (unless exempt from such requirements)? [O.A.C. Rule 3745-59-04(A)(3); 40 CFR 268.(a)(3)]		

Y/N/NA RMK#

(g) The owner/operator has submitted a written certification to the Director (Regional Administrator) which states that the surface impoundment meets the above requirements referenced in Questions 1(a) through (f)? [O.A.C. Rule 3745-59-04(A)(4); 40 CFR 268.4(a)(4)] NA

REMARKS

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

	Y/N/NA	RMK#
1. Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(a) (40 CFR 268.50(a)(2)(i)):	NA	
(a) The identification of the contents?		
(b) With the date which accumulation began?		
2. Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(b) (40 CFR 268.50(a)(2)(ii)):		
(a) A description of its contents?		
(b) The quantity of each hazardous waste received?		
(c) The date each period of accumulation begins? or;		
(d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A)(2)(b); 40 CFR 268.50(a)(2)(ii)]		
3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,		
(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1); 40 CFR 268.50(a)(1)]		

NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B); 40 CFR 268.50(b)] During the first year of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

	Y/N/NA	RMK#
4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days? If so,	NA	
(a) Does the facility meet the requirements of 40 CFR 761.65(b)? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]		
(b) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]		

REMARKS

OAC 3745-67 TREATMENT OR STORAGE IN WASTE PILES

1. Are waste materials subject to dispersal by wind adequately protected against such dispersal? [3745-67-51] NA ____

2. If leachate or run-off from a Waste Pile is a hazardous waste, have the following steps been taken to prevent or properly manage the run-off: [3745-67-53]

   a. (1) The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage? and; N ____

      (2) A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented? and; N ____

      (3) A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented? and; N ____

      (4) Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event? N ____

      OR;

   b. (1) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff? and; N ____

      (2) No liquids or wastes containing free liquids are placed in the pile? N ____

3. Before new waste materials are added to an existing waste pile, is it first ascertained that the material is compatible with the existing waste through appropriate laboratory testing? [3745-67-52] NA ____

   Are the results of the analysis maintained in the facility's operating record as required by 3745-65-13? [3745-67-52] NA ____

4. Before ignitable or reactive wastes are placed in waste piles are one or both of the following met: [3745-67-56]

   a. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and the activity was conducted in compliance with the safety requirements of 3745-65-17? N ____

   b. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction? N ____

	Y/N/NA	RMK #
5. Is the waste pile separated or protected from any incompatible materials which may be stored nearby? [3745-67-57(B)]	NA	
6. At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste?	NA	1

NOTE: If all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted. [3745-67-58]

REMARKS - WASTE PILE REQUIREMENTS

#1 - facility has not yet undergone closure

AUG 27 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

Re: Notice of Violation
Hoge Lumber Company
Non-Notifier
OHD005045729

Dear Mr. Froning:

On May 7, 1990, the Ohio Environmental Protection Agency (OEPA) representing the United States Environmental Protection Agency (U.S. EPA) conducted an inspection under the Resource Conservation and Recovery Act (RCRA) at the above-referenced facility. The purpose of the inspection was to determine the compliance status of the facility with respect to the applicable hazardous waste management requirements of the land disposal restriction regulations as set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270 and 271.

The inspection report documents that spent solvent waste (F003) is generated from spray painting operations. Routinely one (1) gallon per week is generated, however, in peak months as much as 10 to 15 gallons per week can be generated. Past management of the waste was to burn it in a pile or dispose of it on the ground.

The land disposal restrictions regulations for this waste (F003) went into effect on November 6, 1986. These regulations prohibited any land disposal of this waste. Disposal as defined in 40 CFR 268.2 means placement in or on the land and includes but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, or placement in a concrete vault or bunker intended for disposal purposes.

By placing the waste on the ground, your facility is in violation of all applicable land disposal restriction regulations of 40 CFR 268 including waste analysis and operating record keeping.

Within thirty (30) days of receipt of this Notice of Violation, submit documentation demonstrating that these violations have been corrected and indicating what measures have been initiated to assure future compliance. A copy of the inspection report is enclosed for your records.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosures

cc: Mike Savage, OEPA-CO
Tehmton Toorkey, OEPA-NWDO

bcc: Lisa Pierard, TPS
Francene Harris, REB

5HR-12:KOGLE:ao:6-1478:#1:8/20/90:FRONING.LTR

RCRA ENFORCE-MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	KO 8/27	KMP for K.P. 8-27	

OhioEPA
State of Ohio Environmental Protection Agency
Northwest District Office
1035 Devlac Grove Drive
Bowling Green, Ohio 43402-4598
(419) 352-8461 FAX (419) 352-8468

Hard Copy

LDF

Richard F. Celeste
Governor

Re: Auglaize County
Hoge Lumber Company
Hazardous Waste

May 18, 1990

CERTIFIED MAIL

Mr. Clark Froning
Hoge Lumber Company
700 South Main Street
New Knoxville, Ohio 45871

Dear Mr. Froning:

Unannounced inspections were conducted by the Ohio EPA, in your presence, at your facility on May 7, 1990. Mr. Mike Hayes, representing the Solid Waste Section, conducted a solid waste inspection for the Agency; Mr. Chi Ko, representing the Division of Water Pollution Control, conducted a wastewater inspection for Agency; and the writer, representing the Hazardous Waste Section, conducted a Resource Conservation and Recovery Act (RCRA) inspection for the Agency. The results of the wastewater inspection will be sent to you under separate correspondence.

The purpose of the RCRA inspection is to assess compliance with state and federal regulations applicable to a generator, and a treatment, storage and disposal facility of hazardous waste. The purpose of the solid waste inspection is to assess compliance with state solid waste regulations.

At the time of the inspection and at an earlier inspection conducted by the Special Investigations Unit of the Ohio EPA, it was discovered that the facility was illegally incinerating and/or disposing of hazardous waste. Section 3734-02(F) of the Ohio Revised Code states, in part, that "No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter...regardless of whether generated on or off the premises, where the waste is stored, treated or disposed of...except at or to any of the following: (1) hazardous waste facility operating under a permit issued in accordance this chapter..."

Hoge Lumber operates a paint spray booth for painting/treating finished lumber products. The solvent used is Guardman Xylol which is mostly xylene and Toluene. The solvent waste thus generated from cleaning of paint spray guns, etc. is a listed hazardous waste (F003) as per Ohio Administrative Code (OAC) Rule 3734-51-33. The spent solvent waste was routinely disposed by placing on a burn pile in the facility backyard and, along with other solid waste, was incinerated. On at least one occasion, according to the facility, the solvent waste was dumped on the ground adjacent to the burn pile.

The facility has also discharged to the ground without evaluating the waste or without obtaining a discharge permit under Chapter 6111 of the Ohio Revised Code solvent contaminated waste water resulting from quenching operations. In addition since the waste storage accumulation area does not have a impermeable liner, accidental spills resulting from unloading operations could routinely be discharged to the ground.

Be advised that incineration and or disposal of hazardous waste requires a hazardous waste permit in accordance with OAC Rule **3745-50-40(B)(1).**

All future hazardous waste generated at the site must be stored in containers and labeled in accordance with the following:

OAC Rule 3745-66-71 to 74 & 3745-66-76 to 77

The hazardous waste must be shipped to a licensed TSD for treatment and disposal.

We have determined that the facility is in further violation of the following state regulations:

1. **OAC 3745-52-12**

   A generator must not treat, store, dispose of, transport or offer for transportation, hazardous waste without having received an EPA identification number from the Administrator.

   The facility at present does not have an EPA identification number although it has routinely generated, treated and disposed hazardous waste. The facility must obtain one immediately by applying to the administrator using EPA Form 8700-12 (enclosed).

   The facility has routinely generated, treated and disposed hazardous waste as follows:

   (i) Spent solvent waste (Xylene and Toluene, EPA waste code F003) resulting from cleaning of paint spray guns was routinely placed either in a waste burn pile in the facility backyard and incinerated or disposed on the ground in an area adjacent to the burn pile. This activity was investigated by the Special Investigations Unit of the Ohio EPA during the April 24th inspection. The facility is thus in violation of the above rule.

   (ii) The facility also routinely discharges to the ground solvent contaminated waste waters resulting from the quenching of solvent fumes in the paint booth. The waste water is

discharged directly to the ground outside the building. This water may be hazardous. The facility may therefore be in violation of the above rule.

(iii) The container storage and accumulation area does not have an impermeable liner. Accidental spills resulting from loading/unloading operations can result in a routine and systematic discharge to the ground. The facility may therefore be in violation of the above rule.

The facility must cease disposal operations identified in (i) and (ii) and must relocate the storage/accumulation area to a place where spills could be monitored. In addition the facility must investigate the extent of ground contamination resulting from the disposal activities mentioned in (i), (ii), and (iii) and submit a closure plan to remediate the contaminated areas.

2. **OAC 3745-52-11(A)**

Any person who produces a waste in the state of Ohio or any person who produces a waste outside of the State of Ohio that is managed in the State of Ohio, and which is not listed as hazardous waste in Chapter 3745-51 of the Administrative Code, shall evaluate the waste to determine if it is hazardous in accordance with the criteria for hazardous waste set forth in Chapter 3745-51 of the Administrative Code.

The facility routinely discharges to the ground solvent contaminated waste waters resulting from quenching of solvent fumes in the paint booth. This waste must be tested for hazardous characteristics and managed as hazardous if it tests positive. The facility is thus in violation of the above rule. If the facility decides to discharge the waters to a creek or to the Sanitary sewer, appropriate discharge permits must be obtained.

The facility uses much of its waste generated as a result of wood working operations as fuel in an industrial boiler to generate steam. The ash resulting from this operation should be tested for characteristic properties which may render it hazardous. The owner/operator must also certify that no listed hazardous waste was used in the boiler as fuel. If it tests positive for hazardous waste it, must be managed as a hazardous waste. The facility is thus in violation of the above rule. At a minimum the waste ash must be treated as a solid waste and managed accordingly.

3. **OAC 3745-52-41**

Any generator who treats, stores, or disposes of hazardous waste on-site must file an annual report on or before March 1 of the next calendar year.

The facility generated and disposed routinely hazardous waste on site. The facility has never filed an annual report with the EPA. The facility is thus in violation of the above rule.

4. **OAC 3745-52-34(A)(1)(2) and (3)**

The waste is placed in containers and the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container and

While being accumulated on site each container and tank is labeled or marked with the words "Hazardous Waste."

Seven drums of unknown material with no identification were being stored on premises. The facility is thus in violation of the above rule. The Special Investigation Unit of Ohio EPA has sampled three of the drums. The facility after analyzing all drums must manage and dispose of the waste properly.

The facility in the past accumulated waste in a container and then placed the waste in a waste pile for disposal. Thus, the facility is in violation of the above rule. The facility must cease this activity and place and manage all future wastes generated in containers and in compliance with the above rules.

5. **OAC 3745-65-13(A)(1)**

The owner/operator must have a detailed Chemical and Physical analyses of the waste material containing all of the information which must be known to properly treat or store the waste.

The facility has Material Safety Data Sheets (MSDS) for raw materials which end up in the waste but did not evaluate the information necessary to properly treat or dispose of the waste. The facility is thus in violation of the above rule.

6. **OAC 3745-65-13(B)**

The owner/operator must maintain a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste.

The facility does not have a written waste analysis plan and hence is in violation of the above rule.

7. **OAC 3745-65-14(B)(2)(a) and (b)**

   The owner/operator must maintain an artificial or natural barrier, which completely surrounds the active portion of the facility, and a means to control entry at all times through the gates or other entrances to the active portion of the facility.

   The facility does not have a fenced in area for the hazardous waste management areas (storage/accumulation areas). The facility is thus in violation of the above rule. This violation must be corrected immediately.

8. **OAC 3745-65-14(c)**

   A sign with the legend, "Danger--Unauthorized Personnel Keep Out," must be posted to the active portion of the facility.

   The facility does not have any signs at its hazardous waste management areas. The facility is thus in violation of the above rule.

9. **OAC 3745-65-52 (A)(B)(C)(D)&(E)**

   The owner/operator must have a written contingency plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous waste.

   The facility does not have a contingency plan and thus is in violation of the above rule.

10. **OAC 3745-65-53 (A)&(B)**

    Copies of the contingency plan must be maintained, updated and submitted to all local and state emergency services that might be required to participate in the execution of the plan.

    The facility does not have a contingency plan and is therefore in violation of the above rule.

11. **OAC 3745-66-12**

    A written closure plan as required in the regulations must be maintained and updated by the facility.

    The facility has as a result of past operations disposed to the ground solvent wastes (F003) or solvent contaminated waste waters at three different locations namely the waste burn pile area, the discharge area for waste waters next to the building, and the storage/ accumulation area. The facility must investigate the extent of contamination and

submit a closure plan, as necessary to remediate the site, within thirty (30) days of receipt of this Notice of Violation. Three copies of this plan must be submitted to the Director of Ohio EPA, P.O. Box 1049, Columbus, Ohio 43266-0149.

12. **OAC 3745-66-74**

The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

The facility has not demonstrated that such inspections were conducted and is therefore in violation of the above rule.

13. **OAC 3745-65-15**

The owner or operator must inspect and document inspections for areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

The facility has not documented inspections for container storage/accumulation area and is therefore in violation of the above rule.

14. **OAC 3745-65-16 (A)(B)(C)(D)&(E)**

The owner/operator must provide to all employees a Personnel training program including instruction in safe equipment operation and emergency response procedures, training new employees within six months, and providing an annual refresher course. In addition documentation regarding written job titles, job descriptions and training records must be maintained.

The facility has not maintained documentation to demonstrate compliance with the above rule.

15. **OAC 3745-65-90**

The owner/operator of a surface impoundment, landfill or land treatment facility which is used to manage hazardous waste must implement a ground water monitoring program capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility.

The facility has disposed hazardous waste on the ground and has therefore operated a landfill without a permit. There is no groundwater monitoring system installed at the facility to monitor the uppermost aquifer. The facility is thus in violation of the above rule.

This inspection did not include a review of financial assurance requirements under RCRA. The Land Disposal Restriction portion of this inspection is being forwarded to U.S. EPA for their follow-up.

The following are solid waste observations and recommendations made during the investigation.

During the investigation, various items were found around the facility which are, by definition, considered to be solid waste. Located on the west side of the facility were large piles of ash generated from the burning of sawdust and miscellaneous wood wastes from the plants lumber operations. Also contained in the dumping area were wood pallets, cardboard, a washing machine, and a hot water heater.

Located on the south side of the facility was an area in which more boiler ash had been dumped and used as fill material. A large body of discolored water was located west of the ash pile. The discolored water appeared to have been generated from rain water running over the ash piles.

At this time the facility is in violation of the following Solid Waste Regulations:

1. **ORC 3734.03**

   Which states, "No person shall dispose of solid waste by open burning or open dumping except as authorized by the director of environmental protection in regulations adopted in accordance with section 3743.02."

2. **OAC 3745-27-05 (C)**

   Which states, "No person shall conduct, permit or allow open dumping."

3. **OAC 3745-27-06 (1)**

   Which states, "A permit application as required by section 3734.05 of the Ohio Revised Code shall be submitted, and approved by the director, before the establishment or modification of the solid waste disposal facility is begun."

Due to the above violations the Ohio EPA is requiring the removal of the material to the proper waste disposal facility. The hot water heater, washing machine, cardboard, and pallets must be removed immediately and taken to a licensed sanitary landfill.

The ash resulting from the boiler operations must be tested to determine if the material is hazardous or non-hazardous. If the ash is determined to be hazardous it must be taken to a licensed hazardous waste disposal facility. If

the ash is determined to be non-hazardous it must be taken to a licensed sanitary landfill. The Agency also requests that a copy of the receipt be sent to our office in Bowling Green.

Please respond in writing to this notice of violation (NOV) within ten days of receipt of this letter. Your response must include all actions and timetables necessary to demonstrate compliance.

Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the completed inspection checklist is enclosed for your review. If you have any questions please advise.

Sincerely,

Mike Hayes
Division of Solid and
Hazardous Waste Management

Tehmton Toorkey
Division of Solid and
Hazardous Waste Management

TNT/ckl

Enclosures

cc: Teri Martin, DSHWM/CO
Tom Harcarik, DSHWM/CO
Auglaize County Health Department
Janet Leite, DSHWM/NWDO
A & C Representative
William Palmer, SIU/CO
Mike Hayes, DSHWM/NWDO
Tehmton Toorkey, DSHWM/NWDO
Chi Ko, DWPC/NWDO
NWDO Hazardous waste file
NWDO Solid Waste file
Kim Ogle, USEPA/Region V
Ellen Gerber, DPDW/NWDO

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: HOGE LUMBER

U.S. EPA I.D. No. :

Street: 700 S. MAIN

City: New Knoxville State: OH Zip: 45871

Telephone: 419-753-2263

Owner/Operator: 1. John HOGE - 3. BRUCE HOGE
2. Oliver HOGE 4. Clark Fooning.

Street: 700 S. MAIN.

City: New Knoxville State: OH Zip: 45871

Telephone: 419-753-2263

Inspection Date: 05/07/90 Time: 2-30 pm.

Weather Conditions: Sunny ~70°F

	Name	Agency/Title	Telephone
Inspectors:	TEHMTON TOORKEY	OEPA	419-352-8461
Facility Representative:	Clark Fooning	Partner	419-753-2263

	Generate	Transport	Treat	Store	Dispose
F-Solvent	✓				✓
Dioxin					
California List					
First Third					
Second Third					

RECEIVED
MAY 23 1990
OHIO EPA
N. W. D. O.

Revised 10-20-89

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

   Yes ___ No ___ NA ✓

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

   Yes ___ No ___ NA ✓

8. Are restricted wastes placed in underground injection wells?

   Yes ___ No ✓ List _____

INSPECTION SUMMARY

Processes That Generate LDR Wastes

Spent solvent waste (F003) generated from spray painting operations, - usually about a 1 gal/wk, but in peak months about 10-15 gal/wk.

LDR Waste Management

Facility in the past used to burn the solvent waste in a pile or dispose it on ground, has stopped that practice and in future will ship it to a authorized TSD.

Summary

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

   a. F001 through F005 spent solvents

      Yes ✓ No ___ List* F003.

   b. Dioxin-containing Wastes

      Yes ___ No ✓ List* ___

   c. California List Wastes

      Yes ___ No ✓ List* ___

   d. First and Second Third Wastes

      Yes ___ No ✓ List* ___

   * List wastes if room allows or attach Appendix A.

   Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

   a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments ___

   b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments ___

   c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments ___

d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ___ No ✓ Comments _____

e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).

Yes ___ No ✓ Comments _____

f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).

Yes ___ No ✓ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   Yes ___ No ✓ NA ___

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
   ___ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   Yes ___ No ___ NA ✓

   If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

   * Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      Yes ___ No ___ NA ✓

      If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ___ No ___ NA ✓

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

_____

_____

_____

c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ___ No ___ NA ✓

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ✓ Comments _____

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ___ No ___ Comments N/A.

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ✓ No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

Fax, MSDS data sheets of raw materials

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ___ No ✓

- TCLP Yes ___ No ___ NA ✓

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

___

___

___

- Total constituent analysis Yes ___ No ___ NA ✓

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

___

___

___

- pH ≤ 2 Yes ___ No ___ NA ✓

List the wastes for which pH testing was used.

___

- Paint Filter Liquid Test Yes ___ No ___ NA ✓

List the wastes for which PFLT was used.

___

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ✓ No ___ Comments ___

If yes, the TSD Checklist must be completed.

In past facility burned it in a pile or disposed it on ground.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ___ No ✓ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes ___	No ___
Applicable treatment standards and prohibition levels	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___

b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ___ No ✓ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]? N/A.

  Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes ___	No ___
Applicable treatment standards and prohibition levels	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes ___	No ___

c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

   Yes ___ No ___ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

  Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number	Yes ___	No ___
The corresponding treatment standards and all applicable prohibitions	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Date the waste is subject to the prohibitions	Yes ___	No ___

d. Does the facility generate any First or Second Third "soft hammer" waste?

   Yes ___ No ___ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes ___	No ___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ___	No ___
(iii)	Manifest number	Yes ___	No ___
(iv)	Waste analysis data, if available	Yes ___	No ___

3. "Soft Hammer" Demonstrations/Certifications

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ___

b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ___ No ___

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ___	No ___
Addresses	Yes ___	No ___
Telephone numbers	Yes ___	No ___
Contact dates	Yes ___	No ___
Certification statement	Yes ___	No ___

Attach a copy of the demonstration and certification.

e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ___

If yes, attach a copy of written discussion.

f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ___ No ___

Describe the type of treatment and treatment facilities:

Waste Code	Type of Treatment	Treatment Facility

g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ___ No ___

h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ___ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ___ No ✓ Comments ___

D. RCRA Corrective Action and CERCLA Response Action Waste N/A

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

   Yes ___ No ___ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

   Yes ___ No ___ NA ___ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes N/A

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No ___

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No ___ Comments _____

   If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

   Yes ___ No ___ NA ___ Comments _____

   If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

_____

_____

_____

B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ___

If yes, list the restricted wastes that have been mixed.

_____

_____

_____

C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)*	Yes ___	No ✓	NA ___
Dioxin (TCLP)	Yes ___	No ___	NA ✓
California List (PFLT and/or total constituent analysis)*	Yes ___	No ___	NA ✓
First & Second Third (TCLP and/or total constituent analysis)	Yes ___	No ___	NA ✓

* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes ___ No ✓ Comments _____

a. What date was the waste analysis plan last revised?

_____

b. Are analyses conducted on-site or off-site?

___ On-site ___ Off-site

Identify off-site lab: No Analysis - Knowledge of waste is analyzed.

c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ___ No ___ NA ✓

d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ___ No ___ NA ✓

e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ___ No ___ NA ✓

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ___ No ✓

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ___ No ✓ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ___ No ✓ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

___ Tanks
___ Containers
___ Other (Identify inappropriate storage unit(s).

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ___ No ✓ NA ___

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

   Yes ___ No ✓

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

   Yes ___ No ✓ NA ___

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

   Yes ___ No ___ NA ✓

   If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

   Yes ___ No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

   Yes ___ No ___ NA ✓

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

   Yes ___ No ___ NA ✓

   If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

   Yes ___ No ___ NA ___

   If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

   a. In a facility meeting the TSCA criteria in 761.65(b)?

      Yes ___ No ___ NA ✓

   b. More than one year [268.50(f)]?

      Yes ___ No ___ NA ✓

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

   Yes ___ No ✓ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code	Treatment Processes

3. Was dilution used as a substitute for treatment [268.3]?

   Yes ___ No ___ Comments _____

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

   Yes ___ No ___ Comments _____

   Have treatment standards or prohibition levels been met?

   Yes ___ No ___ Comments _____

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

   Yes ___ No ___ NA ___

   If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

   Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

   Yes ___ No ___

7. Does the facility treat "soft hammer" wastes?

Yes ___ No ___ (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ___ No ___

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?

   Yes ___ No ___ List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

   Yes ___ No ___

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

   Yes ___ No ___ NA ___

5. Have the Subpart F groundwater monitoring requirements been met?

   Yes ___ No ___ NA ___

6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

   Yes ___ No ___

   Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

   Sludge Yes ___ No ___ Waste Code _____

   Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

   _____

   _____

   _____

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

   Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

    Yes ___ No ___ Comments _____

    a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

       Yes ___ No ___

    b. Are residues subsequently managed in another surface impoundment?

       Yes ___ No ___

    c. Are residues treated prior to disposal?

       Yes ___ No ___ Comments _____

       If yes, are waste residues treated on-site or off-site?

       On-site _____ Off-site _____

       Identify waste code and treatment method:

Waste Code	Treatment Method

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

    Yes ___ No ___ Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

   Yes ✓ No ___

   Note: Do not include surface impoundments addressed in D, Surface Impoundments.

   If yes, specify which units and what wastes each unit has received:

   waste pile - ash dumped on ground - F003 waste

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

   Yes ___ No ✓

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   Yes ___ No ✓

   If yes, at what frequency? ___

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

   Yes ___ No ✓

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

   Yes ___ No ✓ Comments ___

   If yes, have the minimum technology requirements been met for all units receiving such wastes?

   Yes ___ No ✓

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: HOGE LUMBER COMPANY
Address: 700 S. MAIN
NEW KNOXVILLE OH 45871
County: AUGLAIZE
Facility Contact: CLARK FRONING

Date of Inspection 5/7/90
HWFB #: ?
USEPA ID #: ?
Facility Phone #: 419-753-2263
Facility Contact Phone#:
Safety Equipment #:

Inspector(s)Name(s): TEHMTON TOURKEY
MIKE HAYES (SOLID WASTE)
CHI KO (WASTE WATER)

STATUS
Cond. Ex. SQG___ SQG ✓ Generator___ Transporter___ Treatment___ Storage___ Disposal___

ACTIVITIES
Containers ✓ Tanks___ Surface Impoundments___ Incineration/Thermal treatment ✓
Waste pile ✓ Land treatment___ Landfill ? Groundwater monitoring___
Used oil burner___ Hazardous waste fuel burner/blender___

	Y/N/NA	REMARK #
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	Y	
2. Are they :		
a. Abandoned(disposed;incinerated;accumulated; stored, or treated prior to disposal)?	Y	
b. Recycled?		
c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?	N	
3. If recycled or accumulated, treated or stored before recycling, is the waste:	N/A	
a. Used in a manner constituting disposal?		
b. Burned for energy recovery?		
c. Reclaimed? (Refer to Table 1 ot 3745-51-02)		
d. Accumulated speculatively?		
4. Is the material recycled by being:	N/A	
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?		
b. Used as an effective substitute for commercial products?		
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?		

	Y/N/NA	REMARK #
5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	Y	
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	N	
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	N/A	
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	N/A	
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	N/A	
10. Has the facility submitted a Part B?	N	
11. Was advance notice of the inspection given? If so, how far in advance? Unannounced Inspection	N	

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

An unannounced inspection was conducted with Mike Hayes (Solid Waste) and Chi-Ko (Wastewater/pretreatment).

Facility generates spent solvent waste (xylene & Toluene mixture) from wood working operations. (F003). Max qty generated during peak season is about 10 to 15 gal/wk. of spent solvent.

7 drums of unknown material are in the facility backyard. They have been tested by S.I.U.

Facility used to burn the solvent in an open ~~area~~ area. along with other refuse.

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)	Y/N/NA	REMARK #
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	Y	
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?	N	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?	1.	
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	Y	
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:	N.	2.
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?		
b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?		
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?		
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?		
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?		
f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?		

1. Facility does manage a waste water tank used to quench acid fumes. [illegible] originally discharged straight to the ground

2. Facility has not used a manifest.
3. Waste was not transported off site.

	Y/N/NA	REMARK #
6. Does the generator meet the following hazardous waste pre-transport requirements:		3
a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?		
b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?		
c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?		
7. Does the generator import or export hazardous waste?	N.	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?		
8. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a. The containers or tanks are clearly marked with the words "Hazardous Waste"?	Y	4
b. The date that accumulation began is clearly marked on each container?	N	
c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete Management of Containers checklist.	N	

4. One drum in ~~salt~~ has words 'Hazardous Waste' which is stored at point of accumulation

	Y/N/NA	REMARK #
d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist.	N/A.	
e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:		
1. Quantities of waste accumulated do not exceed 55 gallons at any time?	Y	
2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?	N/A	
3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77?	Y	
4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?	Y	
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days?	unknown	
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?	N	
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	Y	1

Generator has disposed off (incinerated or disposed on ground) F003 wastes

		Y/N/NA	REMARK #
12.	Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	N-Y	*
13.	Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	N	
14.	Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	N	
15.	Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.	✓	

REMARKS, GENERATOR REQUIREMENTS

* No Documentation

Small Quantity Generator, Conditionally Exempt SQG

		Y/N/NA	REMARK #
1.	Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	Y	
2.	Does the generator produce <100 kg of waste per month? (conditionally exempt SQG)	Y	1
3.	Does the conditionally exempt SQG generate acutely hazardous waste in quantities exceeding those specified in 3745-51-05(E), 3745-51-05(F)	N	
4.	Does the conditionally exempt SQG ensure delivery to an off-site permitted TSD?	N	
5.	Do quantities of hazardous waste accumulated on-site at any one time exceed 1000 kg - or does the generator produce between 100 and 1000 kg of hazardous waste per month - (SQG)? If so, complete items 6-21.	Y	

SQG

6.	Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	Y	
7.	Do quantities of hazardous waste accumulated on-site ever exceed 6000 kg/s? (If so, TSD standards apply. Complete application TSD checklists.) [3745-52-34(D) and (F)] (262.34(d) and 262.34(f))	N	
8.	If wastes are stored in containers, are wastes placed in containers in compliance with 3745-66-70 to 3745-66-77 except 3745-66-76? [3745-52-34(D)(2)] (262.34(d)(2) Complete Management of Containers checklist.	Y	
9.	If wastes are stored in tanks, are wastes stored in tanks in compliance with 3745-66-992? Complete Accumulation in Tanks for SQG's checklist.	N/A	

1- Usually waste produced is less than 100 kg/mo. [illegible] between 100 - 1000 kgs

		Y/N/NA	REMARK #
10.	Is the date accumulation began clearly marked on each container? [3745-52-34(A)(2)] (262.34(a)(2))	N.	
11.	Is each container or tank clearly marked with the words "Hazardous Waste"? [3745-52-34(A)(3)] (262.34(a)(3))	Y	
12.	Does the generator comply with the "Preparedness and Prevention" requirements for owners and operators of hazardous waste facilities? [3745-52-34(D)(4)] (262.34(d)(4)) Complete Preparedness and Prevention checklist.	Y	
13.	Is an emergency coordinator available at all times? [3745-52-34(D)(5)(a)] (262.34)	Y	
14.	Has the following information been posted by the telephone? [3745-52-34(D)(5)(b)] (262.34)		
	a. Name and telpehone number of emergency coordinator.	Y	
	b. Location of fire and spill control equipment.	Y	
	c. Telephone number of local fire department.	Y	
15.	Have emergencies been reported to the National Response Center? [3745-52-34(D)(5)(d)] (262.34)	N/A	
16.	Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)] (262.34(e))	N	
17.	Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of 180 days?	N.	
18.	Have waste shipments been accompanied by a completed manifest? [3745-52-23] (262.23) If no, is the waste being reclaimed under a contractual agreement in accordance with OAC 3745-52-20(F) (262.20(f))?	N/A	
19.	Are signed copies of manifests retained for at least 3 years? [3745-52-40] (262.40)	?	

No manifests
no outgoing shipments

	Y/N/NA	REMARK #
20. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	Y	
21. Are all employees thorough familiar with proper handling and emergency procedures? [3745-52-34(D)(4)(c)] (265.34(d)(4)(iii))	?	

N) 17

Accumulation in Tanks for Generators of between 100 and 1000 kg/mo (SQG)

Applicability: All of the items on this checklist apply to small quantity generators who accumulate hazardous waste in tanks for less than 180 days (or 270 if must ship >200 miles) and do not accumulate over six thousand kg on-site at any time.

		Y/N/NA	REMARK #
1.	Does the small quantity generator comply with all of the following operating requirements? [3745-66-992(B)](265.201(b))	___	___
a.	The treatment or storage complies with 3745-66-17(B) (265.17(b).	___	___
b.	The wastes or treatment reagents are not placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or fail before its intended life.	___	___
c.	The uncovered tanks are operated with 2 feet of freeboard unless the tank is equipped with a containment structure, a drainage control system, or a diversion structure with a capacity that equals or exceeds the volume of the top 2 feet of the tank.	___	___
d.	When waste is continuously added, the tank has a waste feed cut-off or bypass system.	___	___
2.	Has the small quantity generator inspected the following: [3745-66-992(C)] (265.201(c))		
a.	The discharge control equipment (once each operating day)	___	___
b.	The data from monitoring equipment (once each operating day)	___	___
c.	The level of the waste in the tank (once each operating day)	___	___
d.	The construction material (weekly)	___	___
e.	The area surrounding the tank (weekly)	___	___
3.	Has the small quantity generator, upon closure of the tank, removed all hazardous waste from the tank system. [3745-66-992(D)] (265.201(d))	___	___

	Y/N/NA	REMARK #
4. Has the SQG complied with all of the following requirements: [3745-66-992(E)] (265.201(e))	_____	_____
a. The waste has not been placed in the tank unless it is treatmed before or immediately after placement to make it non-reactive or not ignitable and 3745-17(B) (265.17(b) is complied with; and	_____	_____
b. The waste is stored or treated so as to protect it from conditions which will cause the waste to ignite or react; and	_____	_____
c. N.F.P.A.C.L. Code (1977 or 1981) buffer zone requirements are complied with.	_____	_____
5. Has the SQG complied with the following? 3745-66-992(F)(265.201(f))	_____	_____
a. Incompatible wastes are not placed in the same tank unless 3745-65-17(B) (265.17(b) is complied with.	_____	_____
b. Waste is not placed in an unwashed tank which previously held incompatible wastes unless 3745-65-17(B) (265.17(b) is complied with.	_____	_____

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		Y/N/NA	REMARK #
1.	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	N ~~N.A.~~	* Knowledge of waste
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	N. ~~N.A.~~	
3. a.	Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	Y.	
b.	Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))		

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4.	Does the facility have -		
a.	A 24-hour surveillance system, or	N.	
b.	An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	N	
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))	N	
6. a.	Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	N.	

* Only MSDS Sheets available for raw materials that end up in the waste stream.

	Y/N/NA	REMARK #
b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))	N.	
7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))	N.	
8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))	N.	
9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)		
a. Protection from sources of ignition.	~~N~~ Y	
b. Physical separation of incompatible waste materials.	N/A	
c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	N.	
d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)	N/A.	

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

		Y/N/NA	REMARK #
1.	Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	Y	
2.	Has there been a fire, explosion or non-planned release of waste at the facility?	N	
	a. If yes, has the contingency plan been implemented?		
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
	a. Internal alarm system?	N	
	b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
	c. Portable fire control equipment?	Y	
	d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	*
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	Y	
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	Y	
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	Y	
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	Y	

* [illegible] agreement with local fire department

	Y/N/NA	REMARK #
8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))	N/A	

OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

		Y/N/NA	REMARK #
1.	Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):	N.	
	a. Actions to be taken by personnel in the event of an emergency incident?		
	b. Arrangements or agreements with local or state emergency authorities?		
	c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?		
	d. A list of all emergency equipment including location, physical description and outline of capabilities?		
	e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))?		
2.	Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)	N.	
3.	Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)		
4.	Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)	Y.	
5.	If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))	N/A	

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

		Y/N/NA	REMARK #
1.	Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:	N	
a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1).	____	____
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	____	____
c.	The estimated (or actual) weight, volume or density of the waste material?	____	____
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	____	____
e.	The present physical location of each hazardous waste within the facility?	____	____
f.	Records of incidents which require implementation of the Contingency Plan?	____	____
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	____	____
h.	Records of any waste analyses and trial tests required to be performed?	____	____
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	____	____
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?	____	____

	Y/N/NA	REMARK #
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	____	____
2. Has the o/o submitted an annual (bienniel) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	____	____
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.		
3. Are manifests received by the facility signed and dated?	____	____
Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	____	____
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	____	____
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	____	____
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	____	____
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	____	____

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

	Y/N/NA	REMARK #
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	N.	
a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.	N)	
b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).	N)	
c. An estimate of the maximum amount of hazardous waste ever in inventory.	N)	
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	/	
e. The year closure is expected to begin and a schedule for the various phases of closure.	/	
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.		
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))		
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))		
4. Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	/	

	Y/N/NA	REMARK #
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	n)	
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))		
7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)		
8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plat in accordance with OAC 3745-66-16?		
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?		
10. If closure was partial, list the regulated units which remain in use at the faciilty: _____		
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)		
12. Does the post-closure plan include:		
a. A description of proposed ground water monitoring?		
b. A description of planned maintenance activities?		
c. The name, address and phone number of person/office to contact during the post-closure period?		

	Y/N/NA	REMARK #
13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)	N	
14. Has the owner of the property on which a disposal unit is located recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?	N	
b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)	N	

OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

		Y/N/NA	REMARK #
1.	Are hazardous wastes stored in containers which are:		
	a. Closed [3745-66-73(A)] (265.173)?	Y	
	b. In good condition [3745-66-71] (265.171)?	Y	
	c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	Y	
2.	Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	Y	
3.	Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	Y	
4.	Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	~~N~~ Y	*
5.	Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	Y	
6.	Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	Y	

* No documentation

OAC 3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat wastes containing no free liquids (confirmed by the paint filter liquid test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements 3745-66-93 (265.193). Tank systems including sumps that serve as part of a secondary containment system are also exempt from 3745-66-93 (265.193).

For generators who store wastes in tanks for less than 90 days use all items except 24. Compliance with 3745-66-97(C) and OAC 3745-66-991 (265.191) (265.197) is not required.

	Y/N/NA	REMARK #
1. Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Administrator/Director. If yes, skip items 2 through 6.	____	____
2. Has the o/o installed secondary containment which meets the requirements of 3745-66-93 (265.193) for each of the following classes of tank systems by the date specified. [3745-66-93(A)] (265.193)		
a. For all new tank systems prior to being put into service.	____	____
b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989.	____	____
c. For existing tank system of known and documentable age, the latter of January 12, 1989, or when the tank reaches 15 years of age.	____	____
d. For existing tank systems of undocumentable age, by January 12, 1995 or, if the facility was built prior to January 12, 1980, the latter of (1) when facility reaches 15 years of age or (2) January 12, 1989.		
e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be substituted for January 12, 1989.	____	____

	Y/N/NA	REMARK #

Note: If the tank system has no secondary containment, skip to #7.

3. Was the secondary containment system(s) at the facility designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids . [3745-66-93(B)] (265.193(b)) _____ _____

4. At a minimum is the secondary containment system: [3745-66-93(C)] (265.193(c))

   a. Constructed or lined with compatible materials with sufficient strength to prevent failure. _____ _____
   b. Placed on a foundation or base capable of providing support. _____ _____
   c. Provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours of at earliest practicable time is provided. _____ _____
   d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation and is liquid removed within 24 hours or in a timely manner.

5. Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator? [3745-66-93(D)(E)] (265.193(d)(e)) _____ _____

   a. External Liner

      1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank? _____ _____
      2. Is the external liner designed and operated to prevent run-on and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? _____ _____

	Y/N/NA	REMARK #
3. Is the external liner free of cracks and gaps?	____	____
4. Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release?	____	____
b. Vault System		
1. Is the vault system designed and operated to contain 100% of the capacity of the largest tank?	____	____
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	____	____
3. Are chemically resistant water stops in place at all joints?	____	____
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?	____	____
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?	____	____
6. Is the vault system provided with an exterior moisture barrier?	____	____
c. Doubled-Walled Tank		
1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?	____	____
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	____	____
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	____	____

	Y/N/NA	REMARK #
6. Is ancillary equipment including above ground piping, welded flanges and joints, sealless pumps and valves, provided with secondary containment (e.g., double-walled piping, jacketing, trench)?	____	____
a. If no, is ancillary equipment inspected daily for leaks? [3745-66-93(F)] (265.193(f))	____	____
7. For existing tank system, without secondary containment that meets 3745-66-93 (265.193) standards, does the o/o have a written assessment certified by an independent P.E. that includes all of the following: [3745-66-91(A)(B)] (265.191(a)(b))	____	____
a. Design standards?	____	____
b. The characteristics of hazardous waste(s) that have been or will be handled?	____	____
c. Corrosion protection measures?	____	____
d. The age of the tank system has been estimated or documented?	____	____
e. A leak test for non-enterable underground tanks?	____	____
f. A leak test or an internal inspection by qualified P.E. for <u>other than</u> non-enterable underground tanks?	____	____
8. Have the tests specified in 7f and 7g been conducted annually until secondary containment is provided [3745-66-93(I)(4)] (265.193(i)(4)):	____	____
9. For tank systems found to be leaking or unfit for use as a result of the above tests or inspections, has the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4) (265193(i)(4))	____	____
10. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)] (265.191(c))	____	____

	Y/N/NA	REMARK #
11. For all tanks found to be leaking or unfit for use as a result of the assessment the o/o has complied with 3745-66-96 265.196 (see #18) [3745-66-91(D)] (265.191(d) and [3745-66-93(I)] (265.193(i)(4))	____	____
12. For new tank systems, (construction began after July 14, 1986) has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following: [3745-66-92(A)] (265.192(a))		
a. Design standards	____	____
b. The characteristics of hazardous waste to be stored or treated	____	____
c. Corrosion protection for tank systems in contact with soil or water	____	____
d. Protection from vehicular traffic for underground tanks	____	____
e. Adequacy of tank foundation, proper anchoring and effects of frost heave	____	____
13. Does the o/o have on file at the facility, written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:		
a. Inspection for damage and/or inadequate construction and installation and a statement that deficienices were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))	____	____
b. Proper backfilling; [3745-66-92(C)] (265.192(c))	____	____
c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))	____	____
d. Proper support and protection of ancillary equipment; [3745-66-92(E)] (265.192(e))	____	____
e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))	____	____

	Y/N/NA	REMARK #
14. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank but has not migrated beyond the zone of engineering control complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) and decontaminated or removed contamined soil. If soil cannot be removed, has the tank been closed [3745-66-93(G)(3)] (265.193(g)(3))	____	____
15. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and has migrated from the zone of engineering control complied with 3745-66-96(A)(B)(C) and (D) (265.196 (265.193(g)(4)(i) and (ii)? (see #18) and prevent migration and decontaminated soil? [3745-66-93(G)(4) (265.193(g)(4))	____	____
16. Does the o/o follow the general operating requirements below: [3745-66-94] (265.194)		
a. Hazardous waste or treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or owthwise fail.	____	____
b. The o/o uses appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)	____	____
c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred.	____	____
17. Has the o/o documented the inspections required in 3745-66-95 (265.195), in the operating record of the facility, including the following:		
a. Spill control equipment (daily).	____	____
b. Above ground portion of the tank (daily).	____	____
c. Data from leak detection equipment (daily).	____	____
d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily).	____	____

	Y/N/NA	REMARK #
e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.	_____	_____
f. All sources of impressed current at least bi-monthly.	_____	_____
18. Has the o/o of a tank system or secondary containment system from which there has been a leak or spill or which is unfit for use removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)		
a. Immediately ceased flow into tank and investigated cause of release	_____	_____
b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.	_____	_____
c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.	_____	_____
d. Immediately conducted a visual inspection of the release and prevent further migration and removed and disposed of any visible contamination of soil or surface water.	_____	_____
e. Reported any release to the environment to the Director (Regional Administrator) within 24 hour unless it is less than 1 lb. and was cleaned up immediately.	_____	_____
f. Submitted a report wihtin 30 days of the release to Director (Regional Administrator).	_____	_____
19. If a release has occured from the tank system have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1))		
a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.	_____	_____
b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.	_____	_____

	Y/N/NA	REMARK #
c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.	____	____
d. If a through e have not been satisfied, has the tank been closed in accordance with OAC 3745-66-97?	____	____
e. The o/o has obtained certification from an independent P.E. it the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).	____	____
20. If the requirements if #19 have not been met, has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)?	____	____
21. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] (265.198(a))		
a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or	____	____
b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or	____	____
c. The tank is used solely for emergencies.	____	____
22. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management area and any public streets, alleys or adjoing property lines as required by the NFPA flammable or combustible code (1977 or 1981): [3745-66-98(B)] (265.198(b))	____	____

	Y/N/NA	REMARK
23. Has the o/o placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material [3745-66-99] (265.199)?	___	___
a. If so, have the requirements of 3745-65-17(B) (265.17(b)) been met?	___	___
24. In addition to conducting the waste analysis required by 3745-65-13 (165.13) when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991] (265.200)		
a. Conducted waste analysis and trial treatment storage tests.	___	___
b. Obtained written documentation on similar waste under similar operating conditions.	___	___

OAC 3745-67 SURFACE IMPOUNDMENTS (40 CFR PART 265 SUBPART K)

		Y/N/NA	REMARK #
1.	Is at least 2 feet (60 cm) of freeboard maintained in the surface impoundment, or has written certification that the impoundment is of adequate design been prepared? [3745-67-22] (265.222)	_____	_____
2.	Are earthen structural containment systems equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water. [3745-67-23] (265.223)	_____	_____
3.	Is the level of freeboard in the surface impoundment inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented. [3745-67-26] (265.226)	_____	_____
4.	Whenever a surface impoundment is used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the surface impoundment, has the facility insured the safety of such changes by: [3745-67-25] (265.225)		
	a. Waste analyses and trial treatment or	_____	_____
	b. Written documented information on similar treatment of similar waste under similar conditions?	_____	_____
5.	With the exception of emergency situations, whenver ignitable or reactive wastes are placed in a surface impoundment has the facility insured the safety of the operation by complying with the following: [3745-67-29 and 3745-65-17] (265.229 and 265.17(b))	_____	_____
	a. The waste is immediately treated after placement in the the surface impoundment so that it is no longer hazardous?	_____	_____
	b. The waste is managed to protect from ignition?	_____	_____
	c. A certification from a qualified chemist or engineer is maintained at the facility stating that the design/operation of the unit will prevent ignition or reaction?	_____	_____

	Y/N/NA	REMARK #
6. Incompatible materials are not placed in the same surface impoundment unless it is done in compliance with the safety requirements of 3745-65-17 (165.17(b)? [3745-67-30] (265.230)	_____	_____
7. At closure, were all standing liquids, waste residues, liners, and contaminated soil removed from the unit? [3745-67-28](265.228)	_____	_____
8. Has the owner/operator retrofitted the surface impoundment or ceased receipt of hazardous waste by November 8, 1988? If no, did USEPA grant an exemption prior to that date?	_____	_____

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUND WATER MONITORING REQUIREMENTS SPECIFIED IN 3745-68-10 AND 3745-67-28(C).

OAC 3745-67 TREATMENT OR STORAGE IN WASTE PILES (40 CFR Part 265 SUBPART L)

		Y/N/NA	REMARK #
1.	Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal? [3745-67-51] (265.251)	_____	_____
2.	If leachate or run-off from a Waste Pile is a hazardous waste, then following steps have been taken to prevent or properly manage the situation: [3745-67-53] (265.253)		
a. (1)	The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage; and	_____	_____
(2)	A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented; and	_____	_____
(3)	A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented; and	_____	_____
(4)	Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event;	_____	_____
	or		
b. (1)	The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff; and	_____	_____
(2)	No liquids or wastes containing free liquids are placed in the pile.	_____	_____
3.	No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. [3745-67-52] (265.252)	_____	_____

	Y/N/NA	REMARK #
4. Are ignitable or reactive wastes not placed in waste piles unless one or both of the following conditions is met: [3745-67-56] (265.256)		
a. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of 3745-65-17. (265.17(b))	_____	_____
b. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	_____	_____
5. Are incompatible wastes, ignitable and reactive wastes placed in the waste pile only in accordance with the safety requirements of 3745-65-17? [3745-67-56 and 3745-67-57(A)] (265.256 and 265.257(a))	_____	_____
6. Is a waste stored in a pile which is incompatible with materials stored nearby, separated or protected from them? [3745-67-57(B)] (265.257(b))	_____	_____
7. At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste? (Note: if all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted) [3745-67-58] (265.258)	_____	_____

OAC 3745-68 LANDFILLS (40 CFR PART 265, SUBPART N)

	Y/N/NA	REMARK #
1. General Operating Requirements. Does the facility provide the following:		
a. Run-on control capable of handling a 24-hr, 25-yr storm? [3745-68-02(A)] (265.302(a))	_____	_____
b. Run-off control capable of handling a 24-hr, 25-yr storm? [3745-68-02(B) (265.302(b))	_____	_____
c. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-68-02(B)]	_____	_____
d. Are facilities associated with run-on and run-off control systems managed to maintain design capacity after rain events? [3745-68-02(C)] (265.302(c))	_____	_____
e. Control of wind dispersal of hazardous waste? [3745-68-02(D)] (265.302(d))	_____	_____
2. Surveying and Recordkeeping. Does the operating record include: [3745-68-09] (265.309)		
a. A map showing the exact location and dimensions of each cell? [3745-68-09(A)] (265.309(a))	_____	_____
b. The contents of each cell and the location of each hazardous waste type within each cell? [3745-68-09(B)] (265.309(b))	_____	_____
3. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? [3745-68-12] (265.312(a)(b))	_____	_____

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 3745-65-17 AND 3745-68-12(B) APPLY. (40 CFR 265.17(b))

		Y/N/NA	REMARK #
4.	Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] (265.313) If not, the provisions of 3745-68-15 apply. (265.17(b)	_____	_____
5.	Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15] (265.315)	_____	_____
6.	Are containers at least 90% full prior to placement in the landfill?	_____	_____
7.	Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are not longer present. [3745-68-14(A)] (265.314(a))	_____	_____
8.	Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)] (265.314(b)) If yes, has all free liquid been removed, absorbed or otherwise eliminated?	_____ _____	_____ _____
9.	Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)] (265.314(d))	_____	_____
10.	Are the special requirements for lab pack waste met? [3745-68-16] (265.316)	_____	_____
11.	Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12] (265.112)	_____	_____
12.	Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)](265.118(d))	_____	_____

		Y/N/NA	REMARK #
13.	Has the closure/post-closure plan been submitted to the Director/ Regional Administrator 180 days prior to beginning closure? [3745-66-18(E)] (265.118(e))	_____	_____
14.	Does the plan contain information required in 3745-68-10? (265.310)	_____	_____
15.	Is a closure cost estimate available?	_____	_____
16.	Has closure begun?	_____	_____
17.	Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) (265.117(c)) as required in 3745-66-19 (265.119(b))?	_____	_____

Nied

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HE-12

AUG 19 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George C. Jetter
Registered Agent for
Fort Recovery Industries
Boundry Street
Fort Recovery, Ohio 45846

Re: Complaint, Findings of Violation
and Compliance Order
Fort Recovery Industries
EPA I.D. No.: OHD 005 046 149

Dear Mr. Jetter:

Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by Fort Recovery Industries of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on an inspection of the facility located at 2440 State Route 49, Fort Recovery, Ohio by the Ohio Environmental Protection Agency on February 11, 1987, and other information in our files. The Findings in the Complaint state the reasons for such a determination. In essence, the facility failed to meet particular requirements of RCRA relating to groundwater monitoring and non-submittal of a Part B permit application.

Accompanying the Complaint is a Notice of Opportunity for Hearing. Should you desire to contest the Complaint, a written request for a hearing is required to be filed with Ms. Beverely Shorty, Regional Hearing Clerk (5MF-14), United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days from receipt of this Complaint. A copy of your request should also be sent to John Van Vranken, Office of Regional Counsel (5C-16) at the above address.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement with Waste Management Division staff, please contact Walter Nied, United States Environmental Protection Agency, RCRA Enforcement Section (5HE-12), 230 South Dearborn Street, Chicago, Illinois 60604. His phone number is (312) 886-0992.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Mr. Wesley Jetter
2440 State Route 49
Fort Recovery, Ohio 45846

Mr. Tony Sasson, OEPA-CO

Mr. Michael Savage, OEPA-CO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

RECEIVED
AUG 18 1987
REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

IN THE MATTER OF:	)	
	)	DOCKET NO.
FORT RECOVERY INDUSTRIES	)	
2440 STATE ROUTE 49	)	COMPLAINT, FINDINGS OF
FORT RECOVERY, OHIO 45846	)	VIOLATION AND COMPLIANCE ORDER
	)	
EPA I.D. No: OHD 005 046 149	)	

V—W— 87 R-057

This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Fort Recovery Industries, 2440 State Route 49, Fort Recovery, Ohio 45846.

This Complaint is based on information obtained by the U.S. EPA, including a compliance inspection conducted by the Ohio Environmental Protection Agency (OEPA), on February 11, 1987. At the time of the inspection, violations of applicable State and Federal regulations were identified.

Pursuant to 42 U.S.C. §6928(a)(1), and based on the information cited above, it has been determined that Fort Recovery Industries has violated 40 CFR 265.90, 265.91, 265.92, 265.93, 265.94, and 270.10(a).

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA, 42 U.S.C. §6912(a)(1), §6926(b), and §6928 respectively.

From July 15, 1983, until January 31, 1986, the State of Ohio had Phase I interim authorization pursuant to Section 3006 of RCRA, 42 U.S.C. §6926, to administer a hazardous waste program in lieu of the Federal program. This authorization allowed either the State or U.S. EPA to enforce Ohio hazardous waste statutes and regulations, where applicable, in lieu of Federal statutes. U.S. EPA retained authority in matters related to the issuance of final RCRA Permits during this period. Accordingly, this Complaint and Compliance Order seeks to enforce both Federal and State regulations as applicable.

FINDINGS OF VIOLATION

This determination of violation is based on the following:

1. Respondent, Fort Recovery Industries is a person defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15), who owns and operates a facility at 2440 State Route 49, Fort Recovery, Ohio 45846 that generated and stored hazardous waste.

2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste, or owns or operates a facility for the treatment, storage, or disposal of hazardous waste, to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 of RCRA also provides that no hazardous waste subject to regulations may be transported, treated, stored or disposed of unless the required notification has been given.

3. U.S. EPA first published regulations concerning the generation, transportation, treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste activity was required in most instances no later than August 18, 1980.

4. Section 3005(a) of RCRA requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA Permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require that persons who treat, store, or dispose of hazardous waste submit Part A of the permit application in most instances no later than November 19, 1980.

5. Section 3005(e) of RCRA provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition on the permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of RCRA concerning notification of hazardous waste activity have been complied with; and (3) an application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.

6. The Respondent, Fort Recovery Industries, owns and operates a facility at 2440 State Route 49, Fort Recovery, Ohio. The Respondent is an Ohio corporation whose registered agent is George G. Jetter, Boundry Street, Fort Recovery, Ohio 45846.

7. On August 11, 1980, Respondent filed a notification of hazardous waste activity for this facility with U.S. EPA pursuant to Section 3010 of RCRA. On November 19, 1980, Respondent filed Part A of the permit application with the U.S. EPA pursuant to Section 3005 of RCRA. Because the Respondent did not comply with the Hazardous and Solid Waste Amendments of 1984 provisions that required all land disposal facilities to submit a Part B permit application and certify compliance with 40 CFR Part 265 Subparts F and H by November 8, 1985, the Respondent's interim status was terminated on November 8, 1985.

8. The Respondent, Fort Recovery Industries, generates wastewater as a result of their electroplating operation. This wastewater is treated to destroy cyanides and to precipitate metal hydroxides. Until November 2, 1985, treated wastewater had been discharged to any one of several surface impoundments in which the precipitated metals were allowed to settle out of the wastewater. Ultimately, this treated wastewater was discharged to a tributary of the Wabash River. The sludges that collected in the bottom of the surface impoundments have been identified and listed as hazardous wastes under Section 3001 of the Act (U.S. EPA Hazardous Waste No. F006).

9. On February 11, 1987, the OEPA conducted a RCRA inspection of Respondent's facility and stated in its March 10, 1987, cover letter which accompanied the inspection report that the Respondent may be in violation of the groundwater monitoring regulations given at 40 CFR 265.90(a) (Ohio Administrative Code (OAC) 3745-65-90). In his letter of March 17, 1987, Mr. Jeffrey Steers of the OEPA further expanded the OEPA's position concerning the groundwater monitoring violation at the Respondent's facility. He stated that the Respondent was in violation of 40 CFR 265.90 (OAC 3745-65-90). Mr. Steers informed the Respondent that this violation is considered to be a high priority violation by the U.S. EPA and OEPA.

Furthermore, Mr. Steers informed the Respondent that due to the nature of the violation, the OEPA had referred this matter to the U.S. EPA for enforcement action.

10. In a March 31, 1987, letter to the Respondent from the U.S. EPA it was stated that the U.S. EPA concurs with the OEPA letter of March 17, 1987, which states that the Respondent's surface impoundments are hazardous waste management units that require a groundwater monitoring system. Also, this letter confirmed that the Respondent's violation of 40 CFR 265.90(a) constituted a high priority violation.

11. Upon further review of information concerning Respondent's facility, U.S. EPA has determined that in failing to implement a groundwater monitoring program as required by 40 CFR 265.90(a), Respondent has also violated the following requirements of 40 CFR 265 Subpart F:

a. Failure to install a groundwater monitoring system as required by 40 CFR 265.91;

b. Failure to obtain and analyze samples from the monitoring system required by paragraph (a) above in accordance with the requirements of 40 CFR 265.92;

c. Failure to prepare an outline of a groundwater quality assessment program pursuant to 40 CFR 265.93; and

d. Failure to comply with the recordkeeping and reporting requirements of 40 CFR 265.94.

12. In an April 1, 1985, letter to the Respondent the following issues concerning the submittal of a Part B permit application were detailed:

a. Under the authority of 40 CFR 270.10, the submittal of Part B of the permit application was formally requested;

b. The Respondent's interim status shall terminate on November 8, 1985, unless the Part B permit application and a certification of compliance with 40 CFR Part 265 Subpart F and H is submitted by November 8, 1985; and

c. It was suggested that the Respondent contact a Permitting Section staff member to discuss preparing the Part B permit application.

The Respondent failed to submit a Part B application in violation of 40 CFR 270.10(a).

13. In an August 23, 1984, letter to the Respondent from the U.S. EPA the following issues concerning Groundwater Monitoring Requirements were detailed:

a. The Respondent's facility appears to store a hazardous waste in surface impoundments (S04);

b. The Respondent must comply with the groundwater monitoring and Surface Impoundment requirements as defined in 40 CFR Part 265 Subparts F and K respectively;

c. The U.S. EPA will assume that the facility is subject to the groundwater monitoring requirements, unless it received a reply within 15 days;

d. The Respondent was advised that if at any time since November 19, 1980, their operation included storage of hazardous waste, a closure/post-closure plan must be filed with the U.S. EPA's Regional Office; and

e. Respondent was advised to contact the U.S. EPA's Regulatory Analysis and Information Unit for assistance.

14. In letters dated June 16, 1983, and December 6, 1984, to J.R. Proffitt, Director of Manufacturing for the Respondent, U.S. EPA acknowledged receipt of a July 19, 1982, request by Respondent to withdraw its Part A Hazardous Waste Permit Application. Both letters stated that additional information was needed in order to process the Respondent's request.

15. Fort Recovery Industries, Inc., has failed to respond to the above-mentioned U.S. EPA requests for information dated June 16, 1983, August 23, 1984, December 6, 1984, and April 1, 1985.

16. In an October 8, 1980, letter, Mr. Ben Chambers of OEPA responded to an August 12, 1980, letter from Mr. Clarence Cain, Director of Manufacturing for the Respondent. Mr. Chambers informed Mr. Cain that wastewater treatment sludges from the electroplating operations are listed hazardous wastes, and that for the material not to be called a hazardous waste the company would have to apply for a delisting from U.S. EPA.

17. The OEPA-Northwest District Office received a closure plan from the Respondent on November 15, 1985. Within this closure plan, the Respondent's consultant described the lagoons as hazardous waste surface impoundments subject to regulation under RCRA. The closure plan also included a groundwater monitoring plan.

COMPLIANCE ORDER

U.S. EPA, having found Respondent to be in violation of the above cited rules and regulations, issues the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928:

A. Respondent shall, immediately upon this Order becoming final, cease all treatment, storage, or disposal of any hazardous waste except as provided for in Paragraphs C and D below.

B. Respondent shall, immediately upon this Order becoming final, achieve and maintain compliance with the Standards Applicable to Generators of Hazardous Waste, 40 CFR Part 262.

C. Respondent shall revise its closure plan within fifteen (15) days of this Order becoming final to address all review comments as detailed in the U.S. EPA's letter of June 22, 1987.

D. Respondent shall complete all activities detailed within its closure plan within thirty (30) days of the U.S. EPA's and OEPA's final approval of Respondent's closure plan.

E. Respondent shall, within thirty (30) days of this Order becoming final, submit a plan to U.S. EPA for the implementation of a groundwater monitoring system pursuant to 40 CFR 265.90 that meets the requirements of 265.91, 265.92, 265.93, and 265.94. This plan shall also include a schedule for implementation. U.S. EPA shall review and approve or disapprove of said plan. In the event of disapproval of the plan by U.S. EPA, the Agency shall provide written comments explaining the reasons for disapproval. Respondent shall modify its plan in accordance with U.S. EPA comments and resubmit the revised plan within fifteen (15) days of receipt of the Agency's written review comments.

F. Upon approval by U.S. EPA, Respondent shall implement the approved groundwater monitoring plan in accordance with the schedule contained therein.

G. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the time stipulated above to the U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604. Attention: Walter Nied, RCRA Enforcement Section.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Michael Savage, Ohio Environmental Protection Agency, 1800 WaterMark Drive, P.O. Box 1049, Columbus, Ohio 43216-1049.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of FORTY-TWO THOUSAND FIVE HUNDRED EIGHTY-NINE DOLLARS ($42,589) against the Respondent, Fort Recovery Industries pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Attachment 1 to the Complaint provides a detailed summary of the proposed civil penalty. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673.

Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division, and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above-named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS ($25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has requested in writing a hearing not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator you must file a written answer to this Complaint with the Regional Hearing Clerk, Planning and Management Division, U.S. EPA Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice. A copy of your answer and any subsequent documents filed in this action should be sent to John Van Vranken, Assistant Regional Counsel, at the same address. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty

sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §§3701 et seq.

Your answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Walter Nied, RCRA Enforcement Section (5HE-12), at the address cited above, or by calling him at (312) 886-0992.

Dated this 18th day of August, 1987.

Basil G. Constantelos, Director
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

Mr. George G. Jetter
Registered Agent for
Fort Recovery Industries
Boundry Street
Fort Recovery, Ohio 45846

and

Mr. Wesley Jetter
Fort Recovery Industries
2440 State Route 49
Fort Recovery, Ohio 45846

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said persons' last known addresses to the subscriber.

Dated this 19 day of August, 1987.

Ellen Sharp for
Secretary, Hazardous Waste Enforcement Branch
U.S. EPA, Region V

ATTACHMENT 1
PENALTY SUMMARY

Regulation Applicable at Time of Violation	Corresponding Regulation OH Adm. Code	Nature of Requirement Date of Violation	Penalty Assessed
40 CFR 265.90 - 265.94	3745-65-90 - 3745-65-94	Groundwater Monitoring Nov. 1981 to May 1, 1987	$41,589
40 CFR 270.10	3745-50-40	Non-submittal of Part B Permit Application	$ 1,000
		Total Penalty	$42,589

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

   Yes ✓ No ___ NA ___

   If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

   Yes ___ No ___ NA ✓

   If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

   a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

      Yes ___ No ✓ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
____	_____	_____	_____
____	_____	_____	_____
____	_____	_____	_____

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ✓ No ___ NA ___

c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents
___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs $\geq$50 ppm

Yes ___ No ✓ NA ___

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ $\geq$500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	_____	__/__/__
___	_____	__/__/__
___	_____	__/__/__

Comments_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	_____	_____	_____
___	_____	_____	_____
___	_____	_____	_____

Comments_____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ___ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

_____

_____

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

_____

_____

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. **Management**

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ✓ No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments_____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ___ No ✓ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ✓ No ___ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ✓ No ___ (If No, go to d.)

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No ___

Are copies of relevant tolling argreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ✓ No ___ NA ___

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ✓ No ___ NA ___

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments_____

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ✓ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ✓ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No ✓ (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No ___

   Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ___ No ___ NA ___

   (If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

The facility has been starting to follow generator requirements for about a year. The TSD checklists were filled out because also a TSD always a TSD until closure.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes ___	No ✓	NA ___
F020-F023 and F026-F028 Dioxins	Yes ___	No ✓	NA ___
California List Wastes	Yes ___	No ✓	NA ___
First, Second, and Third Third Wastes	Yes ___	No ✓	NA ___

Comments_____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? ___/___/___

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ___ No ✓

If yes, which of the following are sources of analytical data? (More than one may apply.):

___ Generator provides data
___ Facility performs analyses in on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ___ No ___ NA ✓

If analyses are conducted off site, identify lab: ___

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ___ No ✓ NA ___

*See Appendix C for exceptions.
**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ___ No ✓ NA ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ___ No ✓ NA ___

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ✓

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ___ No ✓

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ___ No ✓ NA ___

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ___ No ___ NA ✓

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ___ No ___ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ___ No ✓

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ✓ No ___ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ✓

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes ___ No ✓ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ___ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is neccesary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ✓

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ✓ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ✓ No ___ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes___ No ✓ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No ✓

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
F001 + F003		Incineration	No
F006		"	NO

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005. D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA ✓

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments_____

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes_____

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments_____

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ___ No ✓

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ✓ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ✓ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ___ No ✓ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ✓ No ___ (If No, go to F.)

List Burned in the back

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ___ No ✓

Comments Burning

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ___ No ✓

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ___ No ✓ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ___ No ✓

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ✓

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ___ No ___ N/A Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

_____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA ✓

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ___ No ✓

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA ✓

Comments _____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ✓ No ___ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
Oil land in back	F001, F003, + F006

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ___ No ✓

Comments _____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ✓ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)

Yes ___ No ✓

If yes, at what frequency are analyses performed?_____

_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ✓ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44)_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ✓ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

   Yes ✓ No ___ (If No, go to H.)

2. On-Site Management

   a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

      Yes ___ No ___ NA ✓

   b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

      Yes ___ No ✓ NA ___

      *This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

   Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

   Yes ___ No ✓ (If No, go to 4.)

   Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

   Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

   Yes ___ No ___ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) amd 268.7(b)(5)?

Yes ___ No ___

5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ✓ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments_____

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___Dilutes to meet treatment standards
___Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___Managed in treatment systems regulated under the Clean Water Act
___Non-toxic* characteristic wastes
___Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____
_____
_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments_____

H. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

Unpermitted operated as an illegal TSD

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

_____
_____
_____

B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ___ No ___

(If yes, the Generator checklist must also be completed.)

_____
_____
_____

C. Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ___ No ___ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units or Process

Are treatment residuals generated from these units?

Yes ___ No ___

Comments_____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ___ No ___ NA ___

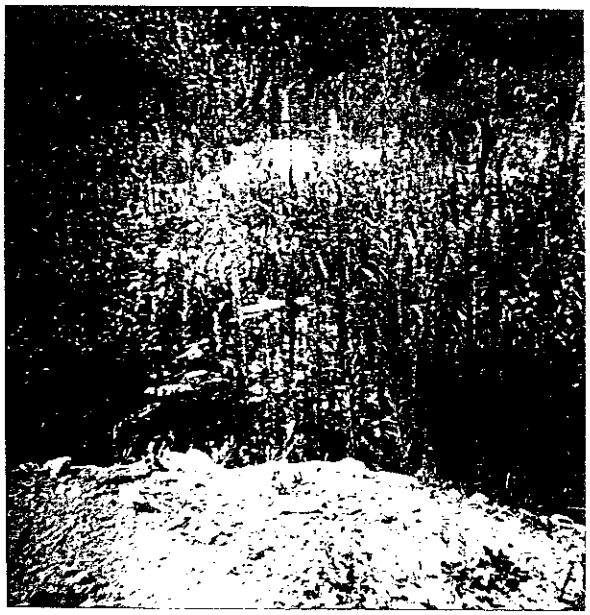
(If Yes, the TSD checklist must also be completed.)

Hoge Lumber Company; New Knoxville, OH; 7-23-91

by: Maryann Segby

Three photos of the backyard area where solvents, paint, and quenching water were burned & illegally disposed. This area is to be cleaned

Hoge Lumber Co. Auglaize Co.
7-23-91
Area where [illegible] were burned



Hoge Lumber Co. Auglaize Co.
7-23-91
Area where [illegible] were burned

Hoge Lumber Co. Auglaize Co.
7-23-91
Area where [illegible] were burned

BROOKSIDE FARMS LABORATORY ASSN. INC.
Environmental & Industrial Division
New Knoxville, Ohio 45871
(419) 753-2448

** ANALYSIS REPORT **

Hoge Lumber Co.
700 South Main Street
New Knoxville, OH 45871

File Number: 60452
Date recv'd: 04/18/91
Date rept'd: 05/07/91

EID Rep: Monte W. Swank
Attention: Clark Froening

Lab Number	IE12542
Sample Description	WOOD ASH

RCRA TESTS		
CORROSIVITY (pH)	S.U.	12.14
TOXICITY (TCLP Extract)		
Arsenic	mg/l	< 0.00004
Barium	mg/l	1.50
Cadmium	mg/l	< 0.005
Chromium	mg/l	0.12
Lead	mg/l	< 0.10
Mercury	mg/l	< 0.00005
Selenium	mg/l	0.0001
Silver	mg/l	< 0.01
CYANIDES - REACTIVE	mg/kg	< 0.02
SULFIDE - REACTIVE	mg/kg	< 1.0

The above TCLP values are corrected according to the recoveries obtained from the same sample spiked with the same analytes.

Jeffrey R. Brachok
Division Coordinator

D. Corrective Action

D. Corrective Action

June 19, 1991 5HR-13

Ms. Ann Anderson
Technical Director
A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, Illinois 60606

Re: Hoge Lumber Co.- R05-14-14

Dear Ms. Anderson:

Enclosed are comments on the Preliminary Review/Visual Site Inspection report for Hoge Lumber Co., received here May 31, 1991. If you have any questions, please call me or Donna Twickler, the EPA Work Assignment Manager. Donna can be reached at (312) 886-6184.

Sincerely

Bernie Orenstein
Regional Project OFficer

Enclosure

√cc: Donna Twickler
Lisa Pierard

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: June 17, 1991

SUBJECT: Comments on Hoge Lumber Preliminary Review/Visual Site Inspection Report

FROM: Donna Twickler Donna L. Twickler
Ohio Permitting Section

TO: Bernie Orenstein
State Program Section

1. Page 4-18, second paragraph: I did not encounter any information on the reuse/treatment/disposal of the separated lacquer fraction of the water lacquer mixture, is this also disposed of after the separation?

2. Page 4-20, the Subsurface Gas Section indicates that there is low potential for the generation of subsurface gas, since the alleged discharge occurred on the surface, in an open area. Since the area is gravel, I would think there would be infiltration of surface liquids. In addition, given the volatile nature of the alleged contamination, the low release potential mentioned for subsurface gas generation is not consistent with the high release potential discussed for groundwater.

3. Page 4-22, Subsurface Gas Section: Same comment as above.

4. Page 4-26, Subsurface Gas Section: Same comment as # 3 above.

6. Page 4-34, Subsurface Gas Section: Same comment as # 3 above.

A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, Illinois 60606
312 648 0111
Facsimile 312 648 1939-2302

Management
Consultants

AT KEARNEY

May 31, 1991

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R05-14-14; Hoge Lumber Company, New Knoxville, Ohio,; EPA I.D. No. OHD005045729; Preliminary Review/Visual Site Inspection Report; Final Deliverable

Dear Mr. Orenstein:

Enclosed please find the PR/VSI Report for the Hoge Lumber facility. Please note that this deliverable is submitted one day past the proposed deadline as approved by Ms. Twickler, the EPA WAM.

Hoge Lumber processes whole logs into rough lumber and finished industrial wood parts. Whole logs are cut into rough lumber. The rough lumber is either air or kiln dried and processed into finished products.

A total of seventeen (17) solid waste management units (SWMUs) and no areas of concern (AOC) were identified as a result of the PR and the VSI. The Cooling Tower Discharge Area (SWMU No. 14) has been classified as a SWMU based on the presence of an algicide in the cooling water which is routinely discharged to this area. However, the agency may wish to review the status of the unit and reclassify it as an AOC based on any additional information.

Suggested further action (SFA) under RCRA corrective action authority is suggested for four (4) units. The SFAs include: soil sampling to determine if disposal or releases of hazardous constituents have occurred is suggested for the South Wood Ash Disposal Area (SWMU No. 6) and the West Wood Ash Disposal Area (SWMU No. 7); and analysis for hazardous constituents of the

wastewater which is discharged from the facilities cooling tower is suggested for the Cooling Tower Discharge Area (SWMU No. 14). The discharge from this unit is not currently regulated by a NPDES Permit. Soil sampling to determine if a release of hazardous constituents has occurred is the suggested further action at the Scrap Steel Storage Area (SWMU No. 15).

A criminal investigation is currently being conducted by the State of Ohio due to alleged illegal disposal activities at the site. Due to the sensitivity of the criminal proceedings, the units in question or the contamination associated with the units, have been referred to as "alleged." The final designation of these units as SWMUs as opposed to "alleged" units may be finalized, if necessary, after the final outcome of the criminal proceedings and further investigation of the units.

The units in question are areas where waste solvents (F003) have allegedly been disposed on the ground surface. These units are: the Spray Chamber Waterfall Collection System and Alleged Discharge Area (SWMU No. 8); the Alleged Solvent Waste Burn Area (SWMU No. 9); and the Former Cabinet Finishing Generator Storage Area (SWMU No. 11). The Ohio EPA has conducted soil sampling at SWMU Nos. 9 and 11. High levels of solvent contamination were found in the soil at the units. It is suggested that further action under the RCRA Corrective Action Program for these units be coordinated with RCRA enforcement activities conducted by the Ohio EPA.

Please feel free to call me or Jim Carloss, the Kearney Team Work Assignment Manger (who can be reached at 303/572-6175), if you have any questions.

Sincerely,

Ann L. Anderson

Ann L. Anderson
Technical Director

Enclosure

cc: D. Twickler, EPA Region V
A. Glazer
L. Poe
J. Carloss
A. Williams (w/o enc)
G. Kline, MRI

PRELIMINARY REVIEW/VISUAL SITE INSPECTION REPORT

Hoge Lumber Company
New Knoxville, Ohio
EPA I.D. No. OHD005045729

Submitted by:

A.T. Kearney, Inc.
222 S. Riverside Plaza
Chicago, Illinois 60606

Submitted to:

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V
230 S. Dearborn Street
Chicago, Illinois 60604

In response to:

EPA Contract No. 68-W9-0040
Work Assignment No. R05-14-14

May 1991

Preliminary Review/Visual; Site Inspection Report

Hoge Lumber Company
New Knoxville, Ohio

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ATTACHMENTS:

A Solid Waste Management Units and Areas of Concern Location Map

B Visual Site Inspection Summary

C Photograph Log

D VSI Field Notebook

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1.0 EXECUTIVE SUMMARY

A Preliminary Review/Visual Site Inspection (PR/VSI) was conducted at the Hoge Lumber Company (Hoge) facility in New Knoxville, Ohio, EPA I.D. No. OHD005045729. This report summarizes the information obtained during the PR and VSI conducted at the facility.

The facility occupies approximately 24 acres at the southern edge of the town of New Knoxville in a rural area. The facility has been in operation since 1914 and has been in the Hoge family since operations began. Adjacent land use includes a public school and residential area to the north, and farmland in the remaining directions (Reference 37).

The Hoge facility processes whole logs into both rough lumber and finished industrial wood parts. The facility receives whole logs from throughout North America. The logs are debarked and cut into rough lumber at the Sawmill. The rough green wood is then either kiln-dried, or air-dried in outdoor racks. After drying, the rough lumber is either sold as is, or further processed onsite into finished products (Reference 37).

There are two areas where finishes are applied to wood products. The finishing operations have been in service since the early 1970s. A small spray booth is used to apply a lacquer finish to wood blocks used as broom heads, and oil-based stains are applied

as a final finish for cabinets manufactured onsite. No other wood treating or preserving operations have reportedly ever been conducted on the property.

The Hoge facility also operates an onsite powerhouse to generate electricity for onsite use. The facility also provides all the power for the Village of New Knoxville and sells excess power to the City of St. Marys. The power is generated using the Wood-Fired Boiler No. 4 (SWMU No. 17) and an oil-fired boiler. The wood fuel for the boiler is generated onsite (References 24, 37).

Although the Hoge Lumber facility is classified as a small quantity generator, an RFA is being conducted due to alleged illegal disposal of hazardous waste at the facility. The investigation of alleged illegal disposal is based on an anonymous complaint filed with the Ohio EPA in April 1990. The complaint alleged that 11 drums of hazardous waste had been dumped on the ground behind the facility. Based on the complaint, the Ohio EPA performed several inspections of the facility. During the inspection, three alleged areas of illegal disposal of hazardous wastes were reported (References 1, 4, 5, 6, 37).

A criminal investigation is currently being conducted by the State of Ohio due to the alleged illegal disposal activities at the site. Due to the sensitivity of the criminal proceedings, the units in question, or the contamination associated with the units, have been

referred to as "alleged." The final designation of these units as SWMUs, as opposed to alleged units, may be made after the outcome of the criminal proceedings and further investigation of the units.

The units where alleged illegal disposal has occurred are: the Spray Chamber Waterfall Collection System and Alleged Discharge Area (SWMU No. 8); the Alleged Solvent Waste Burn Area (SWMU No. 9); and the Former Cabinet Finishing Generator Storage Area (SWMU No. 11).

The Ohio EPA has collected soil samples from the Alleged Solvent Waste Burn Area (SWMU No. 9) and the Former Cabinet Finishing Generator Storage Area (SWMU No. 11). The results of the analysis indicated very high levels of xylene (2583 mg/kg and 12,590 mg/kg, respectively) and toluene (110 mg/kg and 822 mg/kg, respectively) in the soil at these units. Sixty-seven drums of contaminated soil were removed from the burn area in 1990. No remediation has occurred to date at the former storage area (References 4, 5, 6, 7, 37).

The inspections at the facility also noted that Hoge Lumber is currently discharging the non-contact cooling water from the powerhouse cooling tower to surface water without a NPDES permit. This unit has been included as the Cooling Tower Discharge Area (SWMU No. 14).

The operation of wood-fired boilers at the Hoge facility has resulted in numerous violations of opacity and particulate emissions limits. The Ohio EPA issued denials of permit to operate (PTO) for the Former Wood-Fired Boiler Nos. 1 and 2 (SWMU No. 16) in August 1977. These units were shut down in 1985. A new boiler, Wood-Fired Boiler No. 4 (SWMU No. 17) began operation in 1985. The boiler is equipped with Wood-Fired Boiler No. 4 Ash Collection System (SWMU No. 4). However, the unit is still in violation of particulate emission standards. The facility is currently working with the Ohio EPA to resolve this issue (References 11, 12, 13, 14, 19, 22, 25, 26, 37).

A total of seventeen (17) Solid Waste Management Units (SWMUs) and no Areas of Concern (AOC) were identified as a result of the PR and VSI. These are listed in Table 1-1.

Ten (10) of the SWMUs present a low release potential since the units do not manage hazardous waste or hazardous constituents. These units are: the Green Wood Sawmill Dust Collection System (SWMU No. 1); the Wood Parts Manufacturing Dust Collection System (SWMU No. 2); the Wood Refuse Feed System and Silos (SWMU No. 3); the Wood-Fired Boiler No. 4 Ash Collection System (SWMU No. 4); the Wood Ash Loading Area (SWMU No. 5); the Former Wood-Fired Boiler Nos. 1 and 2 Flyash Collection System (SWMU No. 12); and the Former Wood Refuse Silo (SWMU No. 13). The Current Cabinet Finishing Generator Storage Area (SWMU No. 11); the Former Wood-Fired Boiler

Table 1-1

Solid Waste Management Units
at the
Hoge Lumber Facility, New Knoxville, Ohio

SWMU No.		RCRA Regulated
1.	Green Wood Sawmill Dust Collection System	NO
2.	Wood Parts Manufacturing Dust Collection System	NO
3.	Wood Refuse Feed System and Silos	NO
4.	Wood-Fired Boiler No. 4 Ash Collection System	NO
5.	Wood Ash Loading Area	NO
6.	South Wood Ash Disposal Area	NO
7.	West Wood Ash Disposal Area	NO
8.	Spray Chamber Waterfall Collection System and Alleged Discharge Area	NO*
9.	Alleged Solvent Waste Burn Area	NO*
10.	Current Cabinet Finishing Generator Storage Area	NO
11.	Former Cabinet Finishing Generator Storage Area	NO*
12.	Former Wood-Fired Boiler Nos. 1 and 2 Flyash Collection System	NO
13.	Former Wood Refuse Silo	NO
14.	Cooling Tower Discharge Area	NO
15.	Scrap Steel Storage Area	NO
16.	Former Wood-Fired Boiler Nos. 1 and 2	NO
17.	Wood-Fired Boiler No. 4	NO

* These units constitute illegal disposal and are being addressed under RCRA Enforcement Authorities.

Nos. 1 and 2 (SWMU No. 16); and the Wood-Fired Boiler No. 4 (SWMU No. 17) present a low release potential due to the engineering controls on the units which would make a release unlikely.

Three of the units present a high release potential to all media based on the presence or probable presence of organic solvents in the soil. These units are: the Spray Chamber Waterfall Collection System and Alleged Discharge Area (SWMU No. 8); the Alleged Solvent Burn Area (SWMU No. 9); and the Former Cabinet Finishing Generator Storage Area (SWMU No. 11). These units present a high release potential, it is suggested that further action under RCRA Corrective Action authorities be coordinated with RCRA enforcement activities conducted by the Ohio EPA.

Four of the units present a high release potential to soil/groundwater and surface water if hazardous constituents are present in the units. These units are the South Wood Ash Disposal Area (SWMU No. 6); the West Wood Ash Disposal Area (SWMU No. 7); the Cooling Tower Discharge Area (SWMU No. 14); and the Scrap Steel Storage Area (SWMU No. 15). Sampling is suggested at these units to determine if releases of hazardous constituents have occurred.

2.0 INTRODUCTION

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resources Conservation and Recovery Act authorize the U.S. Environmental Protection Agency (EPA) to require corrective action for releases of hazardous waste and/or hazardous constituents from solid waste management units (SWMUs) and other areas of concern (AOCs) at all operating, closed, or closing RCRA facilities. The intent of this authority is to address previously unregulated releases to air, surface water, soil and groundwater, and from generating subsurface gas. The first phase of the corrective action program, as established by EPA, is performance of a RCRA Facility Assessment (RFA). The RFA includes a Preliminary Review (PR) of all relevant available documents, a Visual Site Inspection (VSI) and, if appropriate, a Sampling Visit (SV).

This report presents the results of the Preliminary Review/Visual Site Inspection (PR/VSI) phases of the RCRA Facility Assessment (RFA) for the Hoge Lumber Company facility located in New Knoxville, Ohio. The facility processes whole logs into rough lumber and finished industrial wood products.

The Hoge facility is located in Auglaize County, Ohio, EPA I.D. No. OHD005045729. The information used in preparing the report was compiled from Ohio EPA files, EPA Region V files, and information gathered during the VSI. In addition, facility representatives

were contacted at various dates after the VSI to obtain and clarify site information. Due to the sensitive nature of this facility caused by pending criminal litigation, facility representatives only provided process information.

This report was prepared by compiling and examining existing file material to provide a preliminary assessment of SWMUs at the site and by incorporating the information gathered during the VSI. The facility VSI was conducted on April 8, 1991.

The objectives of an RFA are to:

1. Identify and gather information on releases at RCRA-regulated facilities;

2. Evaluate Solid Waste Management Units (SWMUs) and other Areas of Concern (AOCs) for releases to all media, and regulated units for releases other than to groundwater;

3. Make preliminary determination regarding releases of concern and the need for further actions and interim measures at the facility;

4. Screen from further investigation those SWMUs which do not pose a threat to human health and the environment; and

5. Obtain a thorough understanding of the past and present process and waste management operations at Hoge Lumber.

Chapter 3.0 provides background information about the facility, including facility and process descriptions and discussions of waste management practices, regulatory history, and the environmental setting. Chapter 4.0 provides a summary of the information available for each SWMU and provides conclusions regarding release potentials for each unit. Chapter 5.0 provides the suggested further action for SWMUs identified in this report. Chapter 6.0 lists the references used to prepare this review. A map identifying the location of the SWMUs is presented in Attachment A. A summary of the VSI is presented in Attachment B. The VSI Photograph Log is presented in Attachment C. A photostatic copy of the VSI field notebook is presented in Attachment D.

3.0 GENERAL DESCRIPTION

The following sections of the report present information about the processes, waste management, and regulatory history of the Hoge Lumber facility and information about the facility's environmental setting.

3.1 Facility Description

The Hoge Lumber Company is located at 700 S. Main Street in New Knoxville, Ohio, in Auglaize County (Figure 3-1). New Knoxville is located approximately 50 miles north of Dayton, Ohio. The coordinates of the facility are approximately 40 29' 17" North and 84 19' 05" West. The facility's EPA I.D. No. is OHD005045729. The facility owns a rectangular shaped property west of State Route 29 (Main Street) that covers approximately 24 acres. The property is relatively flat with a slight slope towards the west. The elevation of the developed portion of the facility is approximately 907 feet above mean sea level. There are 16 Buildings on the property. The buildings include: the main office (B-1); the boiler house (B-13); the sawmill (B-6); the wood parts manufacturing buildings (B-14 and B-15); a number of drying kilns (B-6, B-7, B-8, B-9, and B-12); and a number of storage buildings (B-2, B-4, B-14, and B-16). The southeast portion of the facility Figure 3-1 is used to stage the logs. The western portion of the property is used for the outdoor air drying of green rough cut lumber and for the disposal of wood ash (Reference 37).

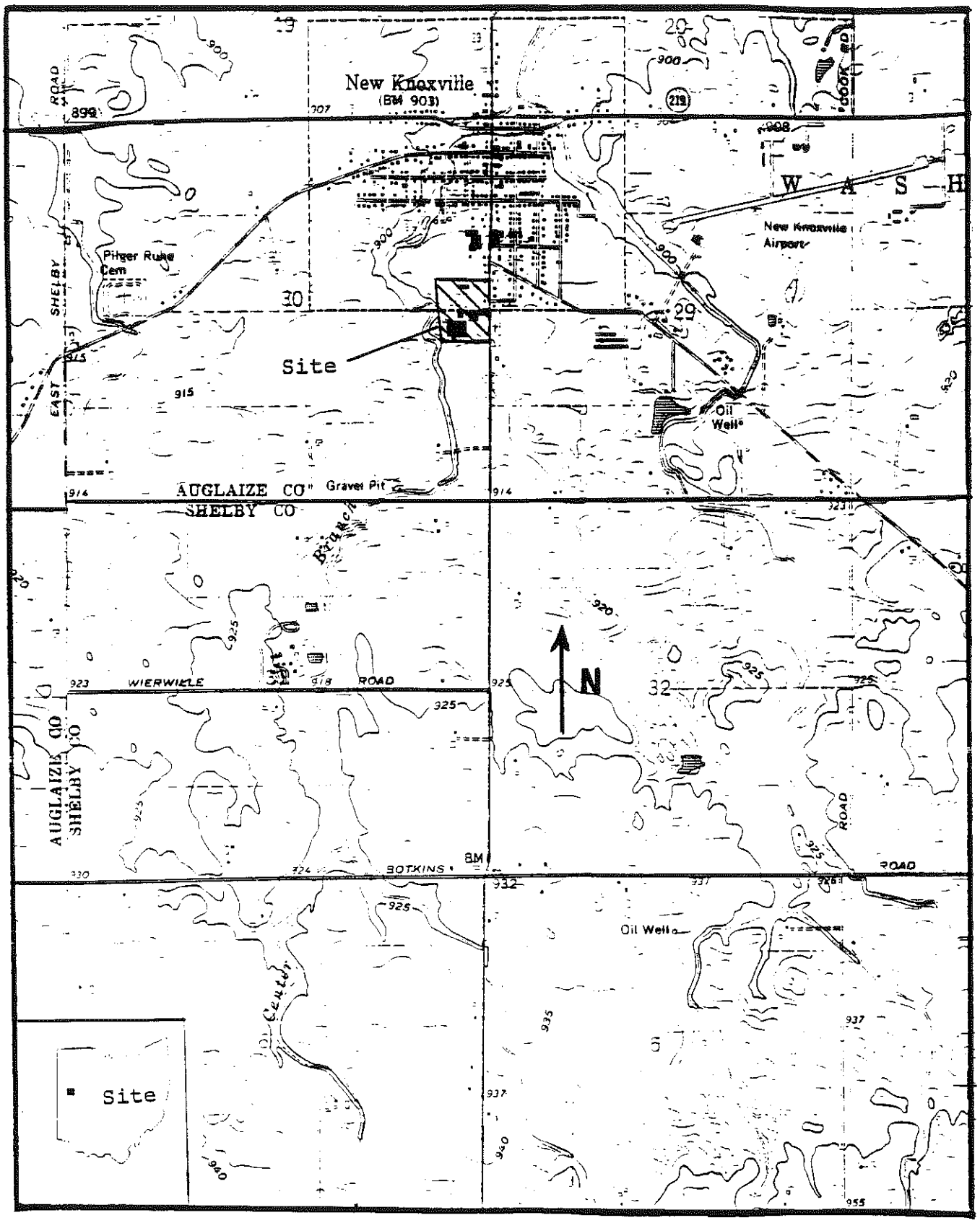


Figure 3-1 Location of the Hoge Lumber Company
New Knoxville, Ohio

(Reference 44)

The facility has been owned by the Hoge family since operations began in 1914. The property was woodland prior to 1914 (Reference 37).

The Hoge facility is located at the southern boundary of the City of New Knoxville. The facility is bordered on the north by a farm field with the New Knoxville Local School about 400 feet beyond. There are also single family homes which line Main Street to the north and northeast of the facility. The east boundary of the facility is State Route 29 (Main Street). A cemetery and farmland are beyond the road to the east. The facility is bordered on the south by farmland. The western border of the property is formed by Center Branch, which is a perennial tributary to the St. Marys River. There are farm fields beyond the Center Branch (Reference 37).

3.2 Process Description

The Hoge Lumber facility processes whole logs into both rough lumber and finished industrial wood products. The process includes debarking, rough cutting, air drying, kiln drying and final sizing

and cutting. The facility also operates a oil-fired and a wood-fired boiler to generate power for onsite use. The fuel for the wood-fired boilers is waste wood generated onsite during sawing operations (Reference 37).

The facility receives whole logs from throughout North America. The logs include a variety of both hardwoods and softwood. The logs are brought in by truck and stored in a open area in the southeast portion of the facility. The logs are then moved to the Sawmill in building B-6 where they are debarked. A band saw is used to cut the logs into rough lumber and an edger is used to create straight edges. The rough lumber is then checked for defects which are carved out with a cut-off saw. The waste wood is ground up in a grinder and burned in the Wood-Fired Boiler No. 4 (SWMU No. 17) (See Figure 3-2). The good lumber is temporarily stacked in the area between B-10 and B-15 (Reference 37).

The good rough lumber is then taken to the stacking shed in Building B-11 where it is counted, graded, and placed in pickets (stacks). The stacks are formed so that air can circulate between the boards for drying. The rough lumber is then either kiln-dried or allowed to air-dry. The method used for drying depends on the final use of the wood. Air drying is used if the wood is allowed to have a high moisture content in its final use. Air drying is performed on the west side of the facility. Kiln drying is used if the moisture content of the final product must be low. There

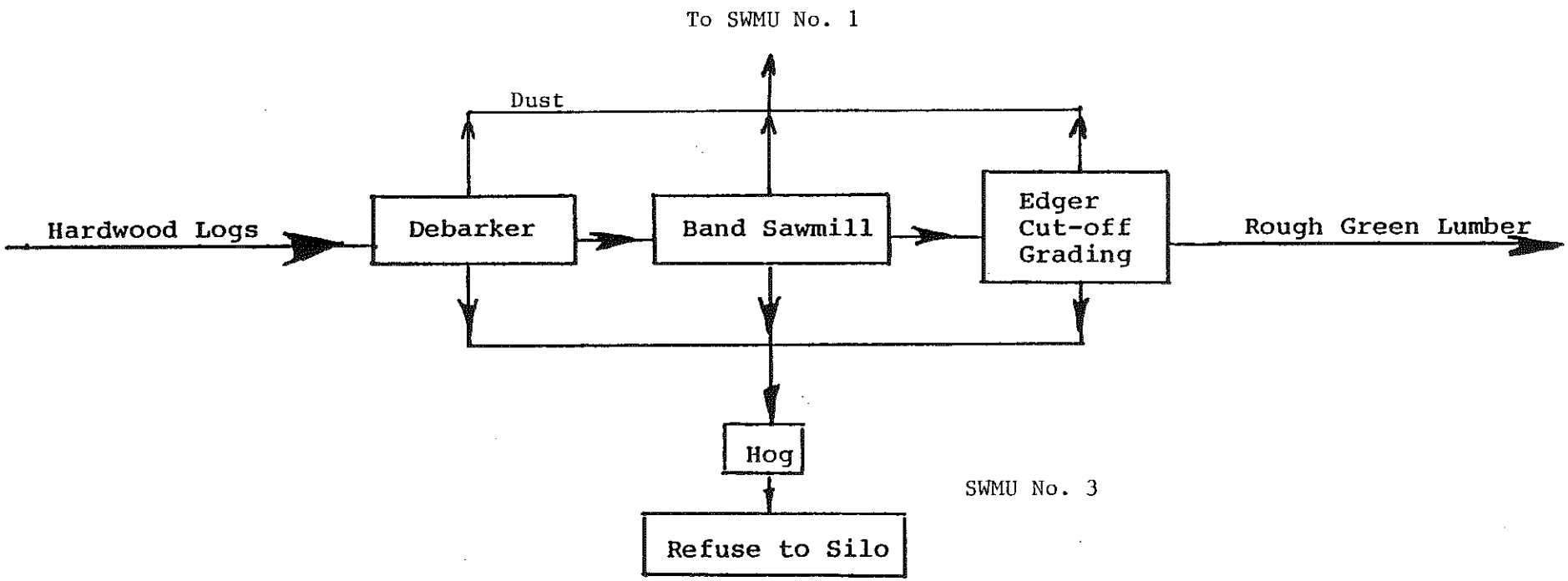


Figure 3-2 Green Wood Sawmill
Process Flow Diagram

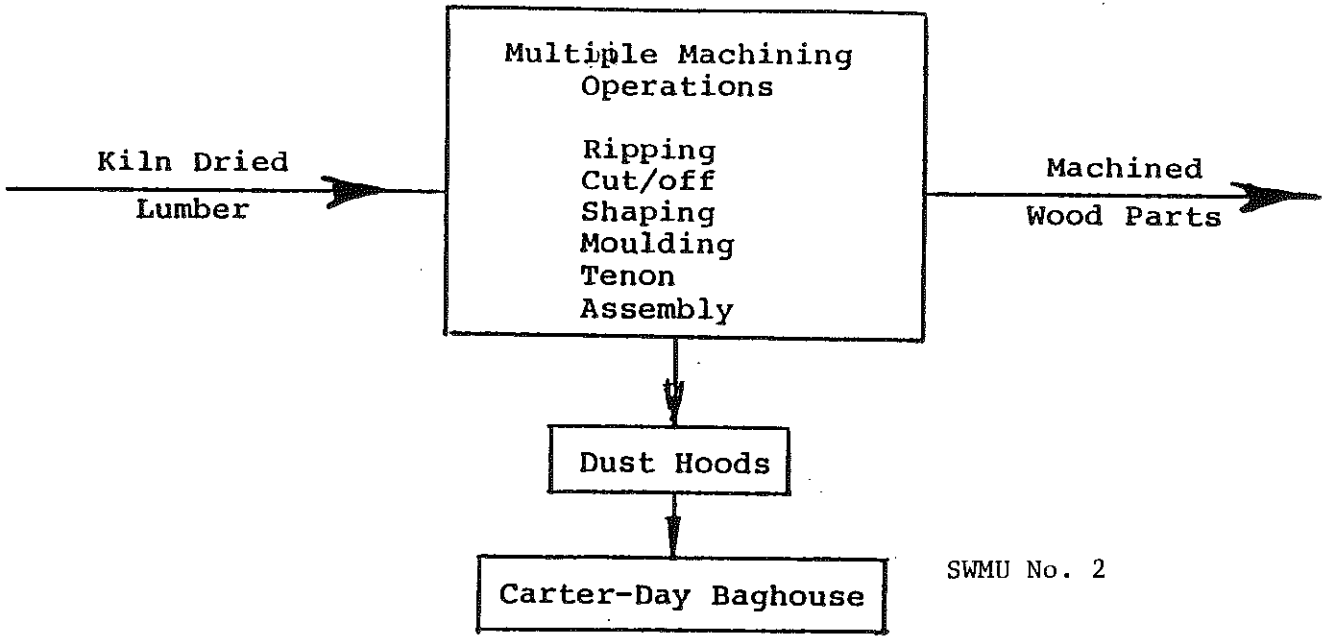
Reference 15

John H. Hoge
Ohio PE 31058

are five kilns in operation at the facility. The rough lumber is dried at approximately 180°F. The length of time the wood is dried varies from several days to several months depending on the species of wood, the thickness of the board, and the final desired moisture content. The kiln-dried rough lumber is either sold offsite or processed into parts onsite (Reference 37).

The onsite manufacturing is performed in Buildings B-14 and B-15. Building B-15 is known as the "bust up" department. Here the rough lumber is cut up into smaller pieces, and planed to the correct thickness. The wood is then taken to Building B-14 for final shaping and boring (See Figure 3-3). At the present time the facility primarily produces flooring material, molding, and blocks for brushes and brooms (Reference 37).

The facility operates a small, self-contained spray booth in Building B-14 which applies a lacquer finish to the brush blocks prior to offsite shipment. There is also a cabinet shop in Building B-6. In the cabinet shop, wood brought in from offsite is assembled into cabinets. The final finishing of the cabinets involves sanding and the application of a stain or finish. The cabinets are then shipped offsite. According to facility representatives, other than the two final finishing operations, no wood treating or preserving operations have ever been performed on the property.



SWMU No. 2

John H. Hoge
Ohio PE 31058

Figure 3-3 Wood Parts Manufacturing Process Flow Diagram

Reference 16

The powerhouse (B-13) is located in the southeast part of the facility. The powerhouse contains fuel oil-fired boiler No. 3, as well as Wood-Fired Boiler No. 4 (SWMU No. 17). The wood-fired boiler is used during the week and on some weekends. The fuel-oil boiler is used on most weekends and holidays when no one is available to monitor the wood boiler. All of the fuel for wood-fired boiler is raw, untreated wood which is generated onsite during sawing and debarking operations. The wood boiler is shut down when not in use (Reference 37).

3.3 Waste Generation and Management Description

The Hoge Lumber facility primarily generates non-hazardous wood sawdust and wood scrap from wood sawing and debarking operations. Other non- hazardous waste generated at the facility consist of ash and flyash from the burning of wood to produce electricity. The facility also generates small quantities of solvent wastes (F003) during wood finishing operations. The description of the hazardous waste management is provided first, followed by a description of the solid, non-hazardous waste.

Hazardous Waste Management

The facility is classified as a small quantity generator and generates waste solvents during wood finishing operations. The solvent wastes generated at the facility are classified as F003

wastes due to the presence of xylene in the lacquer and lacquer thinner used (Reference 4).

There are two wood finishing operations at the facility. The first is a small Nordson spray chamber located in Building B-14. It is used to apply a lacquer finish to wood blocks used for brushes. The second finishing operation is located on the second floor of building B-6 and involves hand applying a final finish to cabinets (Reference 37).

The Nordson spray chamber in Building B-14 is a steel enclosure with a conveyor running through it. The parts to be finished are placed on the conveyor and sprayed with hot lacquer as they pass through the chamber. The lacquer overspray is collected in the bottom of the chamber and flows to a viscosimeter. The viscosity of the lacquer is measured and solvent is added if needed. The lacquer is then pumped back into the storage drum to be reused. The recycle system has been used since the system began operation in the early 1970s. The spray guns inside the Nordson spray chamber are not removed for cleaning. Instead, the cleaning solvents are run through the spray heads and collected in the bottom like the overspray. The spent solvents are then used as thinners in the recycle system.

The two openings in the Nordson spray chamber are equipped with waterfall curtains which are part of the Spray Chamber Waterfall

Collection System and Alleged Discharge Area (SWMU No. 8). The lacquer overspray collected by the water is pumped to a quench tank to remove the solvents. The water in the quench tank is recirculated through the system until the viscosity is too high. The quench tank is then emptied and refilled with fresh water. According to Ohio EPA inspection reports, the wastewater from the quench tank was allegedly allowed to drain through a pipe and discharged to the soil outside the building in an area designated as the discharge area of the SWMU. The drain pipe was visible during the VSI; however, the facility representatives would not confirm the information in the Ohio EPA inspection reports (References 4, 37). The wastewater from the quench tank is currently drained through the same pipe, but is collected in a drum and manifested for offsite disposal (References 4, 37).

The wood finishing operation located upstairs in Building B-6 is used for hand-finishing cabinets. The solvent used is Guardman Xylol, which contains xylene and toluene. Waste solvent (F003) is generated during the cleaning of equipment. One gallon of waste solvent is typically generated per week. However, up to 15 gallons per week can be generated during high use periods (Reference 7). Cabinet finishing operations began in the early 1970s. According to Ohio EPA inspection reports, the spent solvent was formerly stored at the Former Cabinet Finishing Generator Storage Pad (SWMU No. 11), which is a gravel-covered area adjacent to the south side of Building B-6 (Reference 4). According to Ohio EPA inspection

reports, the full drums from the storage area were then taken to the Alleged Solvent Waste Burn Area (SWMU No. 9) where the solvent was allegedly emptied onto the ground and burned. The area was inspected during the VSI; however, the facility representatives would not confirm the information in the Ohio EPA inspection reports. Since April 1990, the waste solvent has been accumulated in a drum at the Current Cabinet Finishing Generator Storage Area (SWMU No. 10). When the drum is full, it is manifested for offsite disposal (References 4, 37).

Non-Hazardous Waste Management

The generation of non-hazardous solid waste at the facility begins at the green wood sawmill located in Building B-6. Whole logs are brought in to the sawmill, where they are debarked. A band saw is used to cut the logs into rough lumber, and an edger is used to create straight edges. The rough lumber is then checked for defects which are cut out with a cut-off saw. The waste wood from the operations is collected on conveyors which are part of the Wood Refuse Feed System and Silos (SWMU No. 3). The conveyors transport the waste wood to a grinder located in the northwest corner of the building. From the grinder (or hog) the wood is conveyed below grade via a screw type conveyor to one of three concrete storage silos. The scrap wood is then burned at Wood-Fired Boiler No. 4 (SWMU No. 17) (Reference 37).

Sawdust in the air is captured by a large steel hood located over each machine. The hoods are part of the Green Wood Sawmill Dust Collection System (SWMU No. 1). The dust is then conveyed via steel pipes to a Carter-Day baghouse on the roof of Building B-6. The baghouse drops the sawdust into the screw conveyor which feeds into concrete silos. The screw conveyor and concrete silos are part of the Wood Refuse Feed System and Silos (SWMU No. 3) (Reference 37).

The next area of solid waste generation is the wood parts manufacturing area in Buildings B-14 and B-15. Rough lumber is cut up into smaller pieces in Building B-15, and planed to the correct thickness. The wood is then taken to Building B-14 for final shaping and boring. The waste wood which falls on the floor in these buildings is swept up, placed in containers, and taken to the grinder in Building B-6. The dust in the air is captured by steel hoods located over each machine. The hoods are part of the Wood Parts Manufacturing Dust Collection System (SWMU No. 2). The wood dust is then conveyed via steel pipes to a Carter-Day Baghouse. The baghouse drops sawdust out of the bottom of the baghouse for the Green Wood Sawmill Dust Collection System (SWMU No. 1). The sawdust is then transported into the concrete silos via the screw conveyor. The drop out for the wood parts manufacturing baghouse occurs via an above-ground steel pipe (Reference 37).

All of the wood waste generated on the property is burned in Wood-Fired Boiler No. 4 (SWMU No. 17) which is located in Building B-13 (the powerhouse). The waste wood from the concrete storage silos is transferred to the boiler via a screw conveyor. Wastes from the burning of the wood is collected in the Wood-Fired Boiler No. 4 Ash Collection System (SWMU No. 4). The ash collection system consists of a Breslove 2-stage collector to remove flyash from the furnace exhaust, and a steel hopper to collect the ash off the grates of the furnace. The dropouts of the Breslove collector and the steel hopper are connected with steel pipes. The ash is then conveyed via a screw conveyor to the Wood Ash Loading Area (SWMU No. 5). The loading area is a concrete loading bay located south of the powerhouse. The ash from the loading bay is transported by front end loader to either the South Wood Ash Disposal Area (SWMU No. 6) or the West Wood Ash Disposal Area (SWMU No. 7). In May 1990, the Ohio EPA ordered the facility to analyze the ash to determine if it was a hazardous waste. The ash was determined not to be hazardous. The Ohio EPA also required the facility to begin shipping the ash to a sanitary landfill for disposal. The facility is still using the onsite disposal areas while they negotiate with the Ohio EPA to use the ash as fill material onsite (References 4, 5, 37, 45).

The facility has burned the wood refuse on the property since operations began in 1914. Several former solid waste units are related to the past operations. These units include the Former Wood Refuse Silo (SWMU No. 13); the Former Wood-Fired Boiler Nos.

1 and 2 (SWMU No. 16); and the Former Wood-Fired Boiler Nos. 1 and 2 Flyash Collection System (SWMU No. 12). The former silo served the same purpose as the current concrete silos. The unit was located on the roof of the green wood sawmill (Building B-6). Scrap wood was stored in the silo until it was burned in the former boilers. The former flyash collection system served Wood-Fired Boiler Nos. 1 and 2 (SWMU No. 16). Flyash from Boiler No. 1 was collected in a cyclone located adjacent to the building. Flyash from Boiler No. 2 was collected in a multiple cyclone located inside the building. Both cyclones dropped out into hoppers and were disposed in either the South or West Wood Ash Disposal Area (SWMU Nos. 6 or 7, respectively). These units were taken out of service in 1985 when Wood-Fired Boiler No. 4 was placed in service.

Another solid waste generated as a result of the burning of wood is the non-contact cooling water from the facility's cooling tower. When the total dissolved solids content of the recirculating cooling water becomes too high due to evaporation, the water is discharged to Center Branch at the Cooling Tower Discharge Area (SWMU No. 14). This type of discharge is normally covered under the NPDES permitting system. However, the Hoge facility has not obtained a NPDES permit for the discharge. The facility is planning to redirect the cooling tower discharge to the sanitary sewer system in the near future (Reference 37).

The last area of potential concern is the Scrap Steel Storage Area (SWMU No. 15). This area is located in the southwest part of the facility and is used for the storage of out-of-service steel equipment and pipes. The scrap steel is sold offsite. This area is of potential concern since several empty drums were noted among the items in the area. Facility representatives stated that the drums were old scrap wood containers (Reference 37).

3.4 Regulatory History

Hoge Lumber Company is classified as a small quantity generation facility. Hazardous waste disposal practices were first discovered at the facility in April 1990 when a complaint alleged that 11 drums of hazardous waste had been dumped behind the facility near a creek. This anonymous complaint was filed with the Ohio EPA on April 23, 1990 (Reference 1). Based on the complaint, a RCRA interim status inspection was conducted on May 7, 1990. The unannounced inspection was conducted by the Ohio EPA and included individuals from the hazardous waste program, solid waste program, and wastewater program (Reference 3).

During the inspection it was found that a toluene/xylene mixture was being illegally disposed in back of the facility. The waste was being directly dumped onto the ground. In addition, during the state inspection, it was stated that the facility previously burned

solvent wastes at the site along with other refuse (Reference 3). Both of these areas are associated with the Alleged Solvent Waste Burn Area (SWMU No. 9). Both practices have since stopped, and the facility is sending the F003 waste to an authorized TSD facility. Soil excavation has been conducted in the area in which the solvent F003 waste was allegedly dumped and burned. Approximately 67 drums of contaminated soil were removed. The soil was analyzed and determined to have both toluene and xylene present at levels which required that the materials be disposed at a permitted hazardous waste TSD facility (References 5, 37).

On May 17, 1973, the Ohio EPA received air permit applications from the Hoge Lumber Company for three fuel-fired indirect heat exchanger boilers (Reference 10). Former Wood-Fired Boilers No. 1 and No. 2 (SWMU No. 16) were wood-fired boilers, and Boiler No. 3 is an oil-fired boiler. Boiler Nos. 1 and 2 usually operated at 8,342 BTUs, and both boilers had a cyclone system which separates particulates (Former Wood-Fired Boiler Nos. 1 and 2 Flyash Collection System, SWMU No. 12) prior to venting to the air through individual 90-foot stacks. These two boilers were taken out of service in 1985. The oil-fired Boiler No. 3 is still in operation as a standby boiler. The boiler operates on Sundays when the plant is not operational. Since Boiler No. 3 is only operational 52 days per year, and since it is an oil-fired boiler with reduced particulate emissions, it appears that it was not necessary for Hoge to obtain a permit for this boiler (Reference 37).

On March 15, 1977, Hoge Lumber Company submitted renewal applications for Former Wood-Fired Boiler Nos. 1 and 2 (Reference 11). On August 19, 1977, the Ohio EPA issued an Application Denial for Permits to Operate for both Boiler Nos. 1 and 2 (References 12, 13).

These denials were based on regular violations of opacity regulations. On May 19, 1978, Hoge Lumber Company submitted Applications for a Permit of Variance to Operate an Air Containment Source for both Boiler No. 1 and No. 2 (Reference 14). A variance was requested by Hoge Lumber Company, and Hoge provided engineering calculations to support its claim that the boilers were not emitting in excess of 500 pounds of particulates per day as was stated by OEPA in their denial of the air permits (Reference 14). However, Hoge Lumber Company decided to install a new Wood-Fired Boiler (SWMU No. 17) with improved air pollution control equipment which significantly reduced the problems with opacity violations (Reference 19).

On May 25, 1983, Hoge Lumber Company received a Permit to Install for the new Wood-Fired Boiler No. 4 (SWMU No. 17) with a Breslove two-stage regenerative collector (Wood-Fired Boiler No. 4 Ash Collection System, SWMU No. 4). Former Wood-Fired Boiler Nos. 1 and 2 were then taken out of service. However, even the new Wood-Fired Boiler No. 4 with new air pollution equipment was not capable of meeting the allowable particulate emissions rate of 0.2 lb/mm

BTU, and it was deemed necessary by OEPA to modify the Breslove mechanical collectors on the new boiler (Reference 22).

A scrubber system was to be installed and operational by May 1, 1990. However, to date the equipment has not been installed or even purchased (Reference 25). In response to OEPA concerns, the facility considered the four options for upgrading Boiler No. 4 in a letter dated July 31, 1990. These options included multiclone separators, an electrostatic precipitator, baghouse, and a wet scrubber system (Reference 26). To date, this issue has not been resolved.

Other air pollution sources onsite include a spray coating operation (Ohio EPA Permit #0306000120-R001) and three underground storage tanks which store heating oil, diesel oil, and gasoline (Reference 21).

The Ohio EPA Division of Public Drinking Water on January 19, 1990 informed Hoge Lumber Company that their public water system was in violation because of failure to comply with sampling and analytical requirements. Water samples on July 18, 1990 were collected and analyzed, and total dissolved solids and iron appeared to exceed the secondary contaminant levels. To date, resolution of this situation has not occurred.

On August 15 1990, an Ohio EPA interoffice communication from Chi Ko expressed concern that solvent-contaminated wastewater is routinely discharged via an outfall pipe in back of the plant. Discharge is occurring into the domestic sanitary sewer system. In addition, according to Mr. Ko, the company may also be discharging solvent wastewater into a stormsewer system which is a tributary of the St. Mary's River (Reference 31).

3.5 Release History

There are three areas at the facility where releases of solvent wastes (F003) may have occurred due to alleged illegal disposal practices. The three areas are: the Spray Chamber Waterfall Collection System and Alleged Discharge Area (SWMU No. 8); the Alleged Solvent Waste Burn Area (SWMU No. 9); and the Former Cabinet Finishing Generator Storage Area (SWMU No. 11).

The waste at the waterfall collection system is a xylene/toluene-contaminated wastewater from quenching of paint fumes. The wastewater was allegedly discharged to the ground outside the unit. There have been no soil samples collected to date at this unit to confirm the discharge (References 4, 5, 37).

The waste at the remaining units is a spent solvent containing xylene and toluene. The Ohio EPA has collected soil samples from both of the alleged disposal areas. The results of the analysis at

the Alleged Solvent Waste Burn Area (SWMU No. 9) indicated very high levels of xylene (2583 mg/kg) and toluene (110 mg/kg) in the soil. The results of the analysis at the Former Cabinet Finishing Generator Storage Area (SWMU No. 11) also indicated high levels of xylene (12,590 mg/kg) and toluene (822 mg/kg) in the soil. Sixty-seven drums of contaminated soil were removed from the burn area in 1990. No remediation has occurred to date at the former storage area. The units have been referred to as alleged due to the sensitivity of a criminal investigation of the facility owner being conducted by the State of Ohio (References 4, 5, 6, 7, 37). No other releases were reported in the available file material or noted during the VSI.

3.6 Environmental Setting

The following sections present information about the meteorology, floodplain, surface waters, soils, geology, groundwater, and receptors in the vicinity of the Hoge Lumber facility.

3.6.1 Meteorology

The Hoge Lumber facility is located in southwestern Auglaize County, Ohio, where the climate is classified as continental in nature. This climate is characterized by moderate extremes of heat and cold, wetness and dryness. Summers are moderately warm and humid, although temperatures rarely exceed 100°F. Winters are cold,

but sub-zero temperatures are rare. The average daily temperature at the Lima, Ohio Airport, located approximately 20 miles northeast of the facility, is 61.1°F. January is the coldest month with an average temperature of 33.4°F. July is the warmest month, and has an average temperature of 85.1°F. The lowest temperature recorded at Lima Airport was in January of 1977 with a reading of -20°. The highest recorded temperature exceeded 101°F in June 1952, July 1954, and August 1951 (Reference 39).

Precipitation occurs generally in the form of rain and snow and is evenly distributed throughout the year. April is the wettest month with an average monthly precipitation of 3.71 inches, and a maximum monthly precipitation amount of 9.35 inches in April 1957. The maximum 24-hour precipitation in Lima was 3.65 inches, which occurred in September 1969. Such a rainfall event could significantly increase the leaching potential of hazardous constituents in land-based units, such as the alleged illegal disposal areas on the facility (SWMU Nos. 8, 9, and 11). The heaviest snowfall occurs in January, with an average of 6.8 inches, and a maximum amount of 22.6 inches in January 1978 (Reference 39).

The average wind speed in Dayton, Ohio (50 miles to the south) is 10.2 miles per hour, with the prevailing direction from the south-southwest. In February and March, winds are generally from the west-northwest. The windiest months typically occur from November through April when the average wind speeds exceed 11 miles per

hour. No wind data was available for Lima (Reference 39).

3.6.2 Floodplain and Surface Waters

The Hoge Lumber facility is bounded on the west side by Center Branch, which is a perennial tributary to the St. Mary's River. The creek is approximately five feet wide near the facility. The elevation of the creek is approximately 895 feet above mean sea level (msl). The elevation of the developed portion of the facility is approximately 907 feet msl. The elevation of the 100-year floodplain in the vicinity of the site was not available. However, the soil survey for Auglaize County indicates that the soil adjacent to Center Branch is subject to flooding. It is very likely that the undeveloped portions of the property adjacent to the creek are within the 100-year floodplain. Runoff from the entire facility flows to the west into Center Branch (References 37, 40, 44).

3.6.3 Soils and Geology

There is no site-specific soil/geology information available for the Hoge facility. Therefore, the following discussion is based on information obtained from general references for the area.

The soils in the vicinity of the facility were formed in place from the glacial till material below. According to the soil survey for

Auglaize County, the soils beneath the facility consist of Blount silt loams, with a two to six percent slope. These soils are described as poorly-drained soils which occur on the slopes between knolls and depressions. The surface layer of the soils is described as a dark grayish-brown silt loam approximately eight inches thick. This description matches the color of the soil observed at the site as documented in the photographs taken during the VSI. The subsoil is approximately 16 inches thick and grades from a grayish-brown silty clay loam in the upper zone, to a yellowish brown, firm clay below. Beneath the subsoil is a layer of yellow-brown clay loam approximately 60 inches thick. The soil is described as having a moderately slow to slow permeability which makes it unsuitable for septic systems. The soil is described as not very suitable for structures due to the high seasonal wetness. Most of the developed portion of the facility is covered by a surface layer of gravel or asphalt (References 37, 40).

Auglaize County is located in the Glaciated Till Plains of the Central Lowlands Physiographic Province. The area has been covered by glaciers on at least three occasions. The area is characterized by thick deposits of glacial till over a sedimentary bedrock. The till plains are interwoven with numerous end moraines which form topographic highs. The facility lies in an area of glacial till, halfway between the St. Johns end moraine, four miles to the south, and the Wabash end moraine, five miles to the north. The bedrock beneath the facility is composed of limestones and dolomites. The

depth to bedrock beneath the site is approximately 115 feet (References 40, 41, 42).

3.6.4 Groundwater

Groundwater in the vicinity of the Hoge facility is found primarily in three geologic horizons: the unconsolidated glacial till; the limestone and dolomite bedrock; and the Buried Sand and Gravel lenses of the ancestral Teays Valley (References 28, 41).

The unconsolidated glacial sediments and soil in the facility area have a seasonably high water table of 12 to 36 inches below the surface in the winter and spring. Well yields are generally low in the glacial till due to the heterogeneous grain sizes of the sediments. It is not known if there are any wells in the site area completed in the glacial till (References 28, 41).

The Hoge facility lies at the edge of the ancestral Teays River Valley. Sand and gravel lenses in the ancient valley are a significant source of potable water in the area and can produce over 400 gallons per minute. The sands and gravels of the valley are covered by approximately 100 feet of till. The bottom of the ancient valley is approximately 500 feet below the surface, one mile north of the facility. The closest known well to the facility which is screened in the sand and gravel is located one mile north of the facility. This well is approximately 224 feet deep and

yields approximately 20 gallons per minute (Reference 41).

The limestone and dolomites of the bedrock in the area are also a significant source of water. The Hoge Lumber facility has two wells on the property which are completed in the bedrock. The wells are both approximately 220 feet deep. The capacity of the wells is not known. The wells are used for both industrial and drinking water supply (Reference 28). The next closest known well to the facility is located approximately 0.5 miles northwest of the site. The well is also completed in the limestone bedrock. The well is approximately 140 feet deep and has a yield of 18 gallons per minute (Reference 41).

3.6.5 Receptors

The Hoge Lumber facility is located within the city limits of New Knoxville, Ohio. According to a 1980 census report, New Knoxville has a population of 750 people. Land around the Hoge facility is residential to the north and farmland in the remaining directions. The nearest residence to the facility is about 200 feet north. The New Knoxville Local School is 400 feet to the north (Reference 37).

Center Branch, which is a perennial stream, is adjacent to the west boundary of the facility. It is not known whether the Center Branch is used for industrial or public water supply in the area.

There are two supply wells located on the Hoge facility. The wells are used for both industrial and drinking water supply. Sample parameters collected from the wells and analyzed for public drinking water indicate all of the parameters were within state and federal standards (Reference 32). Facility representatives stated that the wells have been analyzed for volatile and semi-volatile organics and that none were detected above-detection limits; however, the results of the analysis were not available (Reference 37). There are two other known wells within one mile of the facility. The first is approximately 0.5 miles northwest of the property and is completed in the bedrock. The second well is about one mile north of the facility and is completed in the sands and gravels of the buried Teays Valley (References 28, 41).

4.0 Description of Solid Waste Management Units

This section presents detailed descriptions and release assessments of each Solid Waste Management Unit (SWMU) and Area of Concern (AOC) identified during the PR/VSI. The descriptions encompass unit functional and physical descriptions, dates of operation, waste management, and release controls. The release assessments include history (or evidence) of releases and conclusions regarding the release potential to soil/groundwater, surface water, and air and addresses the potential for subsurface gas generation. For the purposes of this PR/VSI report, a unit is determined to have a high potential for subsurface gas generation if the unit is likely to generate subsurface gases (e.g. methane) which may migrate off-site in signficant quantities which pose a threat to human health and the environment. Other volatile organics which may produce minor quantities of subsurface gases are addressed under soil/groundwater releases.

The seventeen (17) SWMUs and no AOCs identified at the Hoge Lumber facility are described in this section. Photographs of the units are presented in Attachment C.

A criminal investigation is currently being conducted by the State of Ohio due to alleged illegal disposal activities at the site. Due to the sensitivity of the criminal proceedings, the units in question or the contamination associated with the units, have been referred to as "alleged." The final designation of these units as SWMUs, as opposed to alleged units may be made after the outcome of the criminal proceedings and further investigation of the units.

Unit No.: SWMU No. 1 Photograph No. 1-17

Unit Name: Green Wood Sawmill Dust Collection System

Unit Description: The unit is located in Building B-6, which is in the east-central portion of the facility. The unit consists of a series of hoods located above the various saws within the sawmill. The saws are used to debark logs and cut them into rough lumber. The hoods collect the wood sawdust and convey it via steel pipes to a baghouse on the roof of the building. The Carter-Day baghouse is constructed of carbon steel and is approximately 10 feet in diameter and 30 feet high. The baghouse is mounted above the roof on steel legs. The wood dust collects on fabric filter bags inside the baghouse. The bags are periodically shaken to allow the sawdust to drop into the conical bottom of the unit. From there, the dust drops to the Wood Refuse Feed System and Silos (SWMU No. 3). The wood is burned in Wood-Fired Boiler No. 4 (SWMU No. 17). The unit appeared to be in good condition at the time of the VSI.

Prior to the installation of the baghouse, the sawdust was collected in a cyclone which dropped to the Former Wood Refuse Silo (SWMU No. 13). The cyclone was removed from the facility in the mid-1980s. No other information concerning the cyclone is available (References 15, 37).

Date of Start-Up: The unit began operation in approximately 1957. The baghouse was installed in approximately 1982 (References 15, 37).

Date of Closure: The cyclone was removed in the mid 1980s. The baghouse is still in operation (Reference 37).

Waste Managed: The unit manages wood sawdust from the cutting and debarking of logs. The wood is not treated or preserved. There is no evidence that the waste contains hazardous waste or hazardous constituents (References 15, 27).

Release Controls: The dust hoods and pipes are located inside Building B-6, above a concrete floor. The baghouse is located above the roof of the building (References 15, 37).

History of Releases: There have been no known releases from the unit, and none were noted during the VSI (Reference 37).

Conclusions: Soil/Groundwater: There is a low release potential to soil and groundwater due to the concrete floor or building roof beneath the unit (Reference 37).

Surface Water: There is a low release potential to surface water since there is no evidence that the wastes managed in the unit contain hazardous waste or hazardous constituents (Reference 37).

Air: There is a low release potential to air since discharges from the unit are regulated by the Ohio EPA under Permit Number 0306000120 P001 (References 37, 38).

Subsurface Gas: The potential for the generation of subsurface gas is low due to the presence of a concrete floor or building roof beneath the unit (Reference 37).

Unit No.: SWMU No. 2 Photograph No. 1-18

Unit Name: Wood Parts Manufacturing Dust Collection System

Unit Description: The unit is located within and on the roof of Building B-14, which is in the southern portion of the facility. The unit consists of a series of dust collector hoods over each saw or machine. The machines are used to cut and shape the rough lumber into finished products. The hoods collect the wood sawdust and convey it via steel pipes to a baghouse on the roof of the building. The Carter-Day 37-6 Baghouse is constructed of carbon steel and is approximately 10 feet in diameter and 25 feet high. The baghouse is mounted above the roof on steel legs. The wood dust collects on fabric filter bags within the unit. The bags are periodically shaken to allow the sawdust to drop into the conical bottom of the unit. From there, the dust drops into 18-inch diameter steel pipes which convey the sawdust to the bottom of the baghouse of the Green Wood Sawmill Dust Collection System (SWMU No. 1). The dust then enters the Wood Refuse Feed System and Silos (SWMU No. 3) to be burned in the Wood-Fired Boiler No. 4 (SWMU No. 17). The unit appeared to be in good condition at the time of the VSI.

Prior to the installation of the baghouse, the sawdust was collected in a cyclone which dropped to the Former Wood Refuse Silo (SWMU No. 13). The cyclone was removed from the facility in the mid-1980s. No other information concerning this cyclone is available (References 16, 37).

Date of Start-Up: The unit began operation in approximately 1957. The baghouse was installed in approximately 1980 (References 16, 37).

Date of Closure: The cyclone was removed in the mid 1980s. The baghouse is still in operation (Reference 37).

Waste Managed: The unit manages wood sawdust from the sawing and shaping of wood. The wood is not treated or preserved. There is no evidence that the waste contains hazardous constituents (Reference 37).

Release Controls: The dust hoods are located inside a building above a concrete floor. The baghouse is located above the roof of the building, and the steel pipes are located above an asphalt driveway (Reference 37).

History of Releases: There have been no known releases from the unit, and none were noted during the VSI (Reference 37).

Conclusions: Soil/Groundwater: There is a low release potential to soil and groundwater due to the concrete floor or building roof beneath the unit (Reference 37).

Surface Water: There is a low release potential to surface water since there is no evidence that wastes managed in the unit contain hazardous waste or hazardous constituents (Reference 37).

Air: There is a low release potential to air since discharges from the unit are regulated by the Ohio EPA as Permit Number 0306000120 P001 (References 37, 38).

Subsurface Gas: The potential for the generation of subsurface gas is low due to the presence of a concrete floor or building roof beneath the unit (Reference 37).

Unit No.: SWMU No. 3 Photograph Nos. 1-19, 1-23, 1-24

Unit Name: Wood Refuse Feed System and Silos

Unit Description: The unit is located in the southern portion of the facility. The purpose of the unit is to collect wood scraps and sawdust from the Green Wood Sawmill and the Wood Part Manufacturing Area and conveys it to storage silos prior to burning in Boiler No. 4 (SWMU No. 17). The unit consists of open concrete trenches in the floor of Building B-6. The concrete trenches are approximately 2 feet wide and 1.5 feet deep. There is a belt conveyor system in the trenches. Wood scraps, sawdust, and bark are shoveled or pushed onto the conveyor. The conveyor carries the wood scraps to a hog, or grinder. The grinder is constructed of steel and is approximately five feet square and four feet high. Steel blades in the grinder cut the wood scrap into small pieces. The ground-up wood then drops into a steel pipe with a screw conveyor. The screw conveyor is located within a concrete trench on the west side of Building B-6. The screw conveyor also receives the wood dust discharged from the Green Wood Sawmill Dust Collection System (SWMU No. 1). The screw conveyor runs below-grade to the storage silos located on the north side of the powerhouse (Building B-13). The wood is then discharged into the top of the silos (Reference 37).

The wood refuse storage silos are constructed of concrete and rest on concrete pads. The silos are closed-topped and are 24 feet in diameter and 60 feet high. There are a total of three concrete silos. The two silos adjacent to each other outside the northeast corner of the powerhouse are the primary silos. The single silo outside the northwest corner of the powerhouse is used as a backup or overflow.

The wood waste from the silos is fed into Wood-Fired Boiler No. 4 (SWMU 17) via a screw conveyor. The screw conveyor is enclosed in a steel tube which runs from the bottom of the silo into the powerhouse (Reference 37).

All of the components of the unit appeared to be in good condition at the time of the VSI (Reference 37).

Date of Start-Up: The start-up date of the belt conveyor and grinder is not known. The screw conveyor and two of the concrete storage silos were constructed in the late 1970s. The last concrete silo was constructed in 1986 (Reference 37).

Date of Closure: The unit is still in operation.

Waste Managed: The unit manages raw wood scraps and sawdust from wood cutting and machining operations. The wood is untreated and unpreserved. There is no evidence that the waste contains hazardous waste or hazardous constituents (Reference 37).

Release Controls: The belt conveyor system and grinder is located within a concrete trench. The screw conveyor pipe is also mounted within a concrete trench. There are no release controls on the concrete silos other than the concrete floor of the silos (Reference 37).

History of Releases: There have been no known releases from the unit, and none were noted during the VSI (Reference 37).

Conclusions: Soil/Groundwater: There is a low release potential to soil and groundwater due to the concrete floor or trench beneath most of the unit.

Surface Water: There is a low release potential to surface water since there is no evidence that waste managed in the unit contain hazardous waste or hazardous constituents (Reference 37).

Air: There is a low release potential to air since there is no evidence that wastes managed in the unit contain hazardous waste or hazardous constituents (References 37).

Subsurface Gas: The potential for the generation of subsurface gas is low due to the concrete floor or trench beneath the unit (Reference 37).

Unit No.: SWMU No. 4 Photograph Nos. 1-3, 1-4, 1-6

Unit Name: Wood-Fired Boiler No. 4 Ash Collection System

Unit Description: The unit is located inside Building B-13, which is the powerhouse. The powerhouse is located in the southeast part of the facility. The unit consists of a Breslove 2-Stage collector and steel piping to convey ash from the boiler to the Wood Ash Loading Area (SWMU No. 5). The Breslove collector manages flyash from Wood-Fired Boiler No. 4 (SWMU No. 17). The Breslove collector is constructed of steel and is approximately ten feet long, five feet wide, and five feet high, with a conical bottom. The collector is located approximately five stories above the floor of the powerhouse. The Breslove collects the flyash and drops it into a one-foot diameter steel pipe. The flyash then enters a screw conveyor, which also managed wood ash from the firebox of Boiler No. 2 until 1985 (References 19, 37).

The ash from the firebox of Boiler No. 4 is collected in a steel hopper. The steel hopper is approximately five feet square and four feet high, with an inverted pyramid bottom. The ash from the firebox then drops out into the screw conveyor. The firebox hopper is located approximately three stories above the floor of the powerhouse (Reference 37).

The screw conveyor consists of a one-foot diameter steel pipe with a screw-type conveyor inside. The conveyor runs from the third story of the powerhouse to ground level outside the south side of the powerhouse. The conveyor passes beneath the cooling tower and discharges the ash into the Wood Ash Loading Area (SWMU No. 5) (References 19, 37). The unit is operated under an Ohio EPA Permit to Install No. 03-1209. The unit appeared to be in good condition at the time of the VSI.

Date of Start-Up: The unit began operation in early 1985 (Reference 37).

Date of Closure:	The unit is still in operation (Reference 37).
Waste Managed:	The unit manages flyash and firebox ash from the wood-fired Boiler No. 4. The fuel burned in the unit is raw, untreated wood. A sample of the flyash collected by the Ohio EPA in 1990 indicated the flyash did not contain hazardous constituents (References 5, 37, 45).
Release Controls:	Most of the unit is located indoors above a concrete floor. The portion of the screw conveyor that runs outdoors is mounted above a concrete pad or the concrete basin of the cooling tower (Reference 37).
History of Releases:	There have been no known releases of hazardous wastes or constituents from the unit. The facility is currently negotiating with the Ohio EPA to reduce particulate emissions from the Breslove collector (References 22, 37).
Conclusions:	Soil/Groundwater: There is a low release potential to soil and groundwater since the unit is located inside above a concrete floor, or outdoors above a concrete pad. Surface Water: There is a low release potential to surface water since the unit manages a waste that does not contain hazardous constituents (References 5, 37, 45). Air: There is a high potential for particulate release based on Ohio EPA inspection reports (Reference 25). There is a low potential for release of hazardous constituents since the unit manages a waste which does not contain hazardous constituents. The unit is regulated by the Ohio EPA under a Permit to Install (References 19, 37, 45). Subsurface Gas: The potential for the generation of subsurface gas is low due to the presence of a concrete floor beneath the unit (Reference 37).

Unit No.: SWMU No. 5 Photograph No. 1-6

Unit Name: Wood Ash Loading Area

Unit Description: The unit is located south of Building B-13, which is the powerhouse. The unit is just south of the cooling tower. The unit consists of a poured concrete loading bay. The loading area is approximately 12 feet wide and 30 feet long. The unit has a poured concrete floor which slopes from grade level on the south end, to about three feet below grade on the north. The walls of the unit are poured concrete approximately one foot thick. The outlet of the screw conveyor of the Wood-Fired Boiler No. 4 Ash Collection System (SWMU No. 4) discharges ash into the north end of the unit. The ash is taken by front-end loader to either the South Wood Ash Disposal Area (SWMU No. 6), or the West Wood Ash Disposal Area (SWMU No. 7). At the time of the VSI, the unit contained a pile of ash approximately three feet in diameter and two feet high. The ash is light brown in color and moist as it is discharged into the unit. The unit also contained about one foot of accumulated precipitation. The unit does not have an outlet or drain. The precipitation is allowed to evaporate or is picked up by the front-end loader as it loads the ash. The concrete of the unit appeared to be in good condition at the time of the VSI (Reference 37).

Date of Start-Up: The unit began operation in early 1985 (Reference 37).

Date of Closure: The unit is still in operation (Reference 37).

Waste Managed: The unit manages flyash and firebox ash from the Wood-Fired Boiler No. 4 (SWMU No. 17). The ash is from the burning of raw, untreated wood. A sample of the flyash collected by the Ohio EPA in 1990 indicated the flyash did not contain hazardous constituents. The ash entering the unit was moist (References 5, 37, 45).

Release Controls: The unit is constructed with poured concrete floor and walls. There are no other release controls associated with the unit.

History of Releases: There have been no known releases of hazardous wastes or constituents from the unit, and none were noted during the VSI (Reference 37).

Conclusions: Soil/Groundwater: There is a low release potential to soil and groundwater since the unit consists of a poured concrete structure which is in good condition (References 5, 37).

Surface Water: There is a low release potential to surface water since there is no outlet for the unit (References 5, 37).

Air: There is a low release potential to air since the unit manages a moist waste within a concrete structure with high walls (References 5, 37, 45).

Subsurface Gas: The potential for the generation of subsurface gas is low due to the concrete construction of the unit (Reference 37).

Unit No.: SWMU No. 6 Photograph Nos. 1-8, 1-9

Unit Name: South Wood Ash Disposal Area

Unit Description: The unit is located along the southern boundary of the facility, just south of Buildings B-14, 15, and 16. The unit consists of a flat-lying area approximately 200 feet long and 100 feet wide. The area has been used for the disposal of wood ash for a number of years. The ash is, and was, generated from onsite wood-fired boilers used to generate steam and electricity. The area is bounded by buildings on the north, a farm field to the south and west, and log storage area to the east. The unit currently contains a layer of light brown to gray ash which has been graded flat as well as numerous piles of ash which have not yet been flattened. The piles are approximately ten feet in diameter and five feet high. Runoff from the unit flows to the west through a pasture to Center Branch. The creek is approximately 150 yards west of the unit (Reference 37).

In May 1990, the facility was directed to obtain samples of the ash to determine if it was hazardous. If it was hazardous, then it must be manifested offsite for disposal. If the waste was not hazardous, it was to be taken to a licensed sanitary landfill. The waste was determined to be non-hazardous (References 37, 45).

The facility currently is still disposing of the ash on the property while they negotiate with the Ohio EPA to allow the ash to be used as onsite fill material for roads, etc.

Date of Start-Up: The exact date the unit began operation is not known. However, the facility has disposed of wood ash on the property since operations began in 1914 (Reference 37).

Date of Closure: The unit is still in operation (Reference 37).

Waste Managed: The unit manages flyash and firebox ash from the Wood-Fired Boiler No. 4 (SWMU No. 17). The ash is from the burning of raw, untreated wood. A sample of the flyash from Boiler No. 4 collected by the Ohio EPA in 1990 indicated the flyash did not contain hazardous constituents (References 25, 37, 45).

Note: The unit formerly managed flyash from Former Wood-Fired Boiler Nos. 1 and 2 (SWMU No. 16). Due to the alleged history of illegal disposal activities at the facility, there is a concern that wastes other than wood may have been burned in the former boilers. If burning of other wastes was conducted, then the waste in the unit may be of concern.

Release Controls: There are no known release controls associated with the unit.

History of Releases: Runoff from the unit enters Center Branch west of the facility. A large body of discolored water was noted west of the unit during an inspection by the Ohio EPA in April 1990. This discoloration was not noted during the VSI (References 4, 37).

Conclusions: Soil/Groundwater: There is a moderate to high release potential to soil and groundwater based on the history of alleged improper disposal practices at the facility and the presence of discolored standing water adjacent to the unit. It is possible that improper disposal occurred in this area as well (References 4, 5, 37).

Surface Water: There is a moderate to high release potential to surface water based on the presence of discolored standing water adjacent to the unit and the relatively short distance (150 yards) to Center Branch (References 4, 5, 37).

Air: There is a high potential for the release of particulates when the waste in the unit is dry. There is currently a low release potential of hazardous constituents to air since there is no evidence that the waste currently managed in the unit contains hazardous waste or hazardous constituents. The past release potential to air is dependent on whether improper disposal of hazardous constituents occurred at the unit.

Subsurface Gas: The potential for the generation of subsurface gas is low since the wood ash is managed above-grade.

Unit No.: SWMU No. 7 Photograph No. 1-13

Unit Name: West Wood Ash Disposal Area

Unit Description: The unit is located along the western boundary of the facility. The unit consists of a flat-lying area approximately 100 yards square. The area has been used for the disposal of wood ash for a number of years. The ash is generated from onsite wood-fired boilers used to generate steam and electricity. The unit is bounded on the east by lumber drying racks, the south by the Scrap Steel Storage Area (SWMU No. 15), the west by Center Branch, and the north by farm fields. The unit is currently covered with large piles of light brown-gray wood ash piles. The piles are approximately 15 feet in diameter and 10 feet high. Runoff from the unit flows to the west to the small creek. The Alleged Solvent Waste Burn Area (SWMU No. 9) is located in the southeast corner of the unit (Reference 37).

In May 1990, the facility was directed to obtain samples of the ash to determine if it is hazardous. If it was hazardous, then it must be manifested offsite for disposal. If the waste was not hazardous, it was to be taken to a licensed sanitary landfill. The waste was determined to be non-hazardous (References 37, 45).

The facility currently is disposing of the ash on the property while they negotiate with the Ohio EPA to allow the ash to be used as onsite fill material for roads, etc.

Date of Start-Up: The exact date of start-up is not known. However, the facility has disposed of wood ash on the property since operations began in 1915 (Reference 37).

Date of Closure: The unit is still in operation (Reference 37).

Waste Managed: The unit manages flyash and firebox ash from the Wood-Fired Boiler No. 4 (SWMU

No. 17). The ash is from the burning of raw, untreated wood. A sample of the flyash from Boiler No. 4 collected by the Ohio EPA in 1990 indicated the flyash did not contain hazardous constituents (References 5, 37, 45).

Note: The unit formerly managed flyash from Former Wood-Fired Boiler Nos. 1 and 2 (SWMU No. 16). Due to the alleged history of illegal disposal activities at the facility, there is a concern that wastes other than wood may have been burned in the former boilers. If burning of other wastes was conducted, then the waste in the unit may be of concern.

Release Controls: There are no known release controls associated with the unit (Reference 37).

History of Releases: Runoff from the unit enters Center Branch west of the unit (Reference 37).

Conclusions: Soil/Groundwater: There is a moderate to high release potential to soil and groundwater based on the history of alleged improper disposal practices at the facility as well as the proximity of the Alleged Solvent Waste Burn Area (SWMU No. 9). The boundaries of the burn area are not well defined (References 4, 5, 37).

Surface Water: There is a moderate to high release potential to surface water since the unit is adjacent to Center Branch and the possibility of improper disposal of hazardous constituents in the unit.

Air: There is a high potential for the release of particulates when the waste in the unit is dry. There is currently a low release potential of hazardous constituents to air since there is no evidence that the waste currently managed in the unit contains hazardous waste or hazardous constituents. The past release potential to air is dependent on whether improper disposal of hazardous constituents occurred at the unit.

Subsurface Gas: The potential for the generation of subsurface gas is low since the wood ash is managed above-grade (Reference 37).

Unit No.: SWMU No. 8 Photograph Nos. 1-7, 1-10

Unit Name: Spray Chamber Waterfall Collection System and Alleged Discharge Area

Unit Description: The unit is located both inside and outside the south wall of Building B-14, which is in the southern part of the facility. The unit consists of a steel "quench tank" and associated piping. The unit is associated with a small spray booth which sprays a lacquer finish on wood blocks as they pass through the booth on a conveyor. There is a water spray system on each of the two openings of the chamber. The purpose of the spray is to prevent the lacquer fumes from exiting the booth. The water and captured lacquer are collected at the bottom of the opening and pumped through steel pipes to a quench tank. The quench tank is constructed of steel and is approximately four feet square and three feet high. The unit has a plywood cover and is mounted on steel legs above the concrete floor.

The water and lacquer mixture enters the quench tank and the lacquer is allowed to separate. The separated laquer floats to the top of the tank. The water is then recirculated off the bottom until the laquer solids content in the tank is too high. The water/laquer mixture in the quench tank is emptied and the tank is refilled with fresh water.

According to Ohio EPA inspection reports (Reference 4), the facility allegedly discharged the wastewater from the quench tank to the soil until mid-1990. The wastewater was allegedly discharged via a pipe through the wall of the building. The alleged discharge area is a gravel covered pad directly adjacent to the south side of Building B-14. Facility representatives would not confirm the information in the Ohio EPA files due to a possible criminal investigation.

The water/laquer mixture from the quench tank currently empties via a pipe through the wall of the building and discharges into a 55-gallon drum. The wastewater is manifested for offsite disposal (References 4, 37).

The indoor portion of the unit appeared to be in good condition at the time of the VSI. There was no visible staining of the gravel in the alleged discharge area (Reference 37).

Date of Start-Up: The unit began operation in the early 1970s (Reference 37).

Date of Closure: The unit is still in operation (Reference 37).

Waste Managed: The unit manages a wastewater contaminated with lacquer. Solvents used in the process include xylene, isopropanol, butanol, and butylacetate. No analysis of the wastewater is available, but the wastewater is currently manifested as a hazardous waste for offsite disposal. No information is available regarding the total volume of wastewater generated at the unit.

Release Controls: Most of the unit is located indoors on a concrete floor adjacent to a poured concrete wall. There are no release controls associated with the alleged discharge area.

History of Releases: According to available file material, the facility allegedly discharged solvent contaminated wastewater from the unit to the ground surface adjacent to the south side of Building B-14. No soil sampling has been conducted to date in the discharge area to confirm the discharge.

Conclusions: Soil/Groundwater: There is a high release potential to soil and groundwater if the alleged discharge area for solvent contaminated wastewater exists. The alleged discharge area is a gravel pad directly on the ground surface.

Surface Water: There is a moderate release potential to surface water if the alleged discharge area exists since runoff from the unit could reach Center Branch on the west side of the facility.

However, the stream is approximately 150 yards west, and the gravel in the area would cause most of the wastewater to infiltrate.

Air: There is a moderate release potential to air if the alleged discharge area exists due to the volatile nature of the solvents discharged.

Subsurface Gas: The potential for the generation of subsurface gas is low since the alleged discharge occurred on the surface in an open area.

Unit No.: SWMU No. 9 Photograph No. 1-14

Unit Name: Alleged Solvent Waste Burn Area

Unit Description: The unit is located on the west side of the facility. The unit consists of a gravel and ash filled area approximately ten yards square. According to Ohio EPA inspection reports the area was allegedly used for the direct disposal and burning of solvent wastes. The solvent wastes were generated in the cabinet finishing shop in Building B-6. The waste solvents were temporarily stored at the Former Cabinet Finishing Generator Storage Area (SWMU No. 11). When a large quantity of waste was accumulated, it was allegedly taken to the burn area, poured onto the ground, and ignited. It is believed that on at least one occasion, the solvent waste was disposed directly on the ground surface, without igniting. Facility representatives would not confirm the information in the Ohio EPA files due to a possible criminal investigation (References 4, 5, 37).

Soil removal activities were conducted at the unit in May 1990. Approximately 65 drums of soil were removed from the unit and manifested offsite for incineration at the LWD Disposal Facility in Calvert City, Kentucky. Samples collected from the soil in the drum indicated up to 2583 mg/kg of xylene and 110 mg/kg of toluene in the soil (References 4, 5, 6, 37).

At the time of the VSI, the unit consisted of a depressed area which contained ash and soil. Moss and other vegetation was growing in the unit and what appeared to be a woodchuck hole was in the center of the unit (Reference 37).

Solvents from the cabinet finishing operation are currently accumulated in the current Cabinet Finishing Generator Storage Area (SWMU No. 11) prior to being manifested for offsite disposal (Reference 37).

Date of Start-Up:	The exact date of start-up is unknown, but the cabinet finishing operations began in the early 1970s (Reference 37).
Date of Closure:	The unit ceased operation in April 1990.
Waste Managed:	The unit allegedly managed a spent solvent waste (F003) from cabinet finishing operations. The spent solvent contains xylene and toluene. Inspection reports indicate that one gallon per week was routinely generated. However, up to 15 gallons per week may have been generated during peak operation (References 4, 5, 6, 7, 37).
Release Controls:	There are no known release controls associated with the unit.
History of Releases:	Samples collected from soil in drums removed from the unit in May 1990 indicated up to 2583 mg/kg of xylene and 110 mg/kg of toluene. Soil samples collected from the bottom of the excavation indicated 34 mg/kg of xylene and 9.4 mg/kg of toluene.
Conclusions:	Soil/Groundwater: There is a high release potential to soil and groundwater based on the high levels of xylene found in soil removed from the unit and soil remaining in the unit (References 5, 37). Surface Water: There is a high release potential to surface water based on the high levels of xylene found in soil removed from the unit and the soil remaining in the unit, and since the unit is located only about 50 yards from Center Branch (References 5, 37). Air: There is a moderate release potential to air based on the high levels of xylene found in the soil remaining in the unit (References 5, 37). However, releases would be confined to the vicinity of the unit. Subsurface Gas: The potential for the generation of subsurface gas is low since the alleged burning occurred on the surface in an open area.

Unit No.: SWMU No. 10 Photograph No. 1-25

Unit Name: Current Cabinet Finishing Generator Storage Area

Unit Description: The unit is located adjacent to the south side of Building B-6. The unit consists of a steel sided and steel roofed shed. The shed is approximately ten feet long, six feet wide and eight feet high. The floor of the unit is a steel containment pan approximately eight inches deep. A 55-gallon drum is used to accumulate spent solvents (F003) from the cabinet finishing room. The drum rests on steel pipes mounted to the top of the containment pan. When the drum is full, it is manifested for off-site disposal. The unit appeared to be in good condition at the time of the VSI (Reference 37).

Date of Start-Up: The unit began operation in April 1990 (Reference 37).

Date of Closure: The unit is still in operation (Reference 37).

Waste Managed: The unit manages a spent solvent (F003) generated in the cabinet finishing shop. The solvent contains xylene and toluene. Approximately one gallon per week is generated on a routine basis. However, up to 15 gallons is generated during peak operations (References 7, 37).

Release Controls: The unit has a steel containment pan which is approximately ten feet long, six feet wide, and eight inches deep (Reference 37).

History of Releases: There have been no known releases from the unit, and none were noted during the VSI (Reference 37).

Conclusions: Soil/Groundwater: There is a low release potential to soil and groundwater based on the presence of the steel containment pan beneath the unit (Reference 37).

Surface Water: There is a low release potential to surface water based on the presence of the steel containment pan beneath the unit (Reference 37).

Air: There is a low release potential to air since the unit consists of a closed drum inside a storage shed.

Subsurface Gas: The potential for the generation of subsurface gas is low based on the presence of the steel containment pan beneath the unit.

Unit No.: SWMU No. 11 Photograph No. 1-26

Unit Name: Former Cabinet Finishing Generator Storage Area

Unit Description: The unit is located on the south side of Building B-6, adjacent to the Current Cabinet Finishing Generator Storage Area (SWMU 10). The unit consists of a flat, gravel-covered area approximately 25 feet square. The unit was used for the accumulation and storage of a spent solvent waste (F003) generated in the cabinet finishing room. According to Ohio EPA, the solvents were allegedly disposed in the Alleged Solvent Waste Burn Area (SWMU No. 9). In addition, the Ohio EPA inspection reports allege that leaks, spills or disposal occurred in the storage area itself. The facility representatives would not confirm the information in the Ohio EPA files due to a possible criminal investigation (References 4, 5, 37).

Ohio EPA representatives collected a soil sample from the unit in May 1990. The results of the sampling indicated very high levels of xylene (12, 590 mg/kg) and toluene (822 mg/kg) in the soil at the unit (References 4, 5, 37).

No remedial activities have occurred to date at the unit. The unit was gravel covered at the time of the VSI. Waste solvents from the cabinet finishing room are currently accumulated in the Current Cabinet Finishing Generator Storage Area (SWMU No. 10).

Date of Start-Up: The exact date of start-up is unknown. However, cabinet finishing operations began in the early 1970s (Reference 37).

Date of Closure: The unit ceased operation in April 1990 (Reference 37).

Waste Managed:	The unit managed a spent solvent (F003) generated in the cabinet finishing shop. The solvent contains xylene and toluene. Approximately one gallon per week is generated on a routine basis. However, up to 15 gallons is generated during peak operations (References 7, 37).
Release Controls:	There are no known release controls associated with the unit (Reference 37).
History of Releases:	Soil samples collected by the Ohio EPA in May 1990 indicate elevated levels of xylene (12,590 mg/kg) and toluene (822 mg/kg) in the soil at the unit.
Conclusions:	Soil/Groundwater: There is a high release potential to soil and groundwater based on the high levels of xylene and toluene found in the soil at the unit. Surface Water: There is a low to moderate release potential to surface water based on the high levels of xylene and toluene found in the soil at the unit, and the location of the unit is approximately 200 yards from the nearest stream. Air: There is a moderate release potential to air based on the high levels of volatile organics in the soil at the unit. However, the releases would be confined to the vicinity of the unit. Subsurface Gas: The potential for the generation of subsurface gas is moderate based on the high levels of organic solvents found in the soil at the unit. However, the releases would be confined to the vicinity of the unit.

Unit No.: SWMU No. 12 Photograph Nos. 1-20, 1-22

Unit Name: Former Wood-Fired Boiler Nos. 1 and 2 Flyash Collection System

Unit Description: The unit was located inside and adjacent to Building No. B-6. The unit consisted of a Breslove cyclone and a Buell multiclone which served Former Wood-Fired Boiler Nos. 1 and 2 (SWMU No. 16), respectively. The exhaust for each of the boiler furnaces was conveyed via steel pipes to the individual cyclones. The Breslove cyclone was located outside, adjacent to the west side of Building B-6. The Breslove cyclone dropped out to a steel hopper. The steel hopper and cyclone are still in place, but no longer in operation. The steel hopper is approximately four feet long, three feet wide and five feet high. The hopper is located on concrete and has a cover. The Buell multiclone was located inside Building B-6 above a concrete floor. The Buell multiclone also dropped out to a steel hopper, which is no longer in place.

The flyash from the unit was transported to either the South Wood Ash Disposal Area (SWMU No. 6) or the West Wood Ash Disposal Area (SWMU No. 7) for disposal.

The Breslove multiclone and hopper was very rusty at the time of the VSI. However, the unit no longer contained wastes. The Buell multiclone was in good condition at the time of the VSI.

Date of Start-Up: The Breslove cyclone for Boiler No. 1 was placed in service in 1957. The Buell multiclone on Boiler No. 2 was placed in service in 1964 at the same time as the boiler.

Date of Closure: The units were last used in 1985 when Wood-Fired Boiler No. 4 (SWMU No. 17) was placed in service. Most of the equipment has been removed from the facility.

Waste Managed: The unit managed flyash from the Former Wood-Fired Boiler Nos. 1 and 2. The fuel burned in the unit was raw, untreated wood.

Note: Due to the alleged history of illegal disposal activities at the facility, there is a concern that wastes other than wood may have been burned in the former boilers. However, this should not effect the release potentials for this unit.

Release Controls: The Breslove cyclone was located outside Building B-6 on an asphalt driveway. The Buell multiclone was located inside Building B-6, which has a concrete floor.

History of Releases: There were no known releases from the unit and none were noted during the VSI.

Conclusions: Soil/Groundwater: There is a low release potential to soil and groundwater since the unit was located above a concrete floor or asphalt driveway (Reference 37).

Surface Water: There is a low release potential to surface water based on the distance to the nearest surface water (Reference 37).

Air: There is a low release potential to air since the unit is no longer operational (References 37).

Subsurface Gas: The potential for the generation of subsurface gas is low due to the presence of a concrete floor beneath the unit (Reference 37).

Unit No.: SWMU No. 13 Photograph No. 1-17

Unit Name: Former Wood Refuse Silo

Unit Description: The unit is located on the roof of Building B-6 in the east-central part of the site. The unit consists of a steel silo which is 14 feet in diameter and 34 feet high. The unit was used to store scrap wood from the green wood sawmill and the wood parts manufacturing area. The wood was then used as fuel for Former Wood-Fired Boiler Nos. 1 and 2 (SWMU No. 16).

The unit appeared to be in good condition at the time of the VSI (Reference 37).

Date of Start-Up: The unit began operation in 1957 (Reference 37).

Date of Closure: The unit ceased operation in 1985 when Wood-Fired Boiler No. 4 (SWMU No. 17) began operation (Reference 37).

Waste Managed: The unit managed raw wood scraps and sawdust from wood cutting and machining operations. The wood is untreated and unpreserved. There is no evidence that the waste contained hazardous waste or hazardous constituents.

Release Controls: The unit is located on the roof of Building B-6. The top of the unit was vented to a cyclone to control air emissions. It is not known when the cyclone was placed in service.

History of Releases: There were no known releases from the unit, and none were noted during the VSI.

Conclusions: Soil/Groundwater: There is a low release potential to soil and groundwater since the unit was located on the roof of a building (References 4, 37).

Surface Water: There is a low release potential to surface water based on the location of the unit on the roof of a building and the lack of hazardous constituents in the waste (References 4, 37).

Air: There is a low release potential to air since the unit was equipped with a cyclone collector on the silo vent (Reference 37).

Subsurface Gas: The potential for the generation of subsurface gas is low since the unit is mounted on the roof of a building.

Unit No.: SWMU No. 14 Photograph No. No Photo

Unit Name: Cooling Tower Discharge Area

Unit Description: The exact location of the unit is not known. The unit was not observed during the VSI. A request has been made for facility representatives to provide the location of the discharge. According to Ohio EPA files, the cooling tower for Wood-Fired Boiler No. 4 (SWMU No. 17) discharges to the small creek on the west side of the facility (References 2, 37). The water in the cooling tower contains an algicide. The water in the cooling tower is recirculated until the total dissolved solids content is too high. The water is then discharged to the stream and fresh makeup water added. Facility representatives did not know how often the discharges occur, but did state that the cooling tower itself is hardly used during the winter. This reduces the total evaporation from the cooling water and increases the time between discharges. The facility does not have a NPDES permit for the discharge. The Ohio EPA recommended the facility obtain a NPDES permit or redirect the discharge to the local POTW. Facility representatives stated that they intend to redirect the discharge to the POTW (Reference 37).

Date of Start-Up: The unit began operation in 1985.

Date of Closure: The unit is still in operation.

Waste Managed: The unit manages wastewater from the non-contact cooling water tower that serves Wood-Fired Boiler No. 4. The water is treated with an algicide. No samples of the water have been collected to date.

Release Controls: There are no known release controls associated with the unit.

History of Releases: The unit consists of an unpermitted discharge to surface water. There is no data available to determine if the wastewater in the unit contains hazardous constituents.

Conclusions:

Soil/Groundwater: There is a high release potential to soil and groundwater if the waste managed in the unit contains hazardous constituents.

Surface Water: There is a high release potential to surface water if the waste managed in the unit contains hazardous constituents, and the unit discharges to a shallow stream.

Air: There is a low release potential to air based on the expected low amounts of volatile organic constituents in the wastewater.

Subsurface Gas: The potential for the generation of subsurface gas is low based on the expected low amounts of volatile organic constituents in the wastewater.

Unit No.: SWMU No. 15 Photograph No. 1-12

Unit Name: Scrap Steel Storage Area

Unit Description: The unit is located along the west side of the facility, just south of the West Wood Ash Disposal Area (SWMU No. 7). The unit consists of a relatively flat area approximately 100 yards square. The area is used for the storage of scrap steel and equipment until it can be sold for scrap. The material is periodically cut and sold offsite. The length of time the material is stored depends on market conditions. At the time of the VSI, the area was covered with various pieces of steel equipment and pipes. The area is of concern because several empty drums were also noted in the area. Facility representatives stated that these were old garbage or refuse drums. The unit is adjacent to Center Branch and just south of the Alleged Solvent Waste Burn Area (SWMU No. 9).

Date of Start-Up: The start-up date of the unit is unknown.

Date of Closure: The unit is still in operation.

Waste Managed: The unit manages scrap steel and equipment as well as former refuse drums.

Release Controls: There are no known release controls associated with the unit.

History of Releases: There were no known releases from the unit. However, several empty drums reportedly used for refuse were noted during the VSI.

Conclusions: Soil/Groundwater: There is a high release potential to soil and groundwater if the empty drums noted in the unit contained hazardous waste at the time of the disposal, since the drums were on the ground surface.

Surface Water: There is a high release potential to surface water if the empty drums noted in the unit contained hazardous waste at the time of disposal, since the unit is adjacent to Center Branch.

Air: There is a moderate release potential to air if empty drums noted in the unit contained hazardous wastes at the time of disposal. However, the releases would be confined to the vicinity of the drums.

Subsurface Gas: The potential for the generation of subsurface gas is low since any disposal would have occurred on the ground surface in an open area.

Unit No.: SWMU No. 16 Photograph No. 1-22

Unit Name: Former Wood-Fired Boiler Nos. 1 and 2

Unit Description: The unit was located inside Building B-6. The unit consisted of one Erie City 12 MM BTU Wood-Fired Boiler and one Babcox and Wilcox 20 MM BTU Wood-Fired Boiler. Boiler No. 2 was mounted in a below-grade poured concrete vault with a steel grate cover. Boiler No. 1 was mounted on the steel grate and floor of the building, above Boiler No. 2. The fuel for the boilers consisted of scrap wood from sawing operations. The scrap wood was stored in the Former Wood Refuse Silo (SWMU No. 13). The facility was required to shutdown the units due to high particle emissions. At the time of the VSI, Boiler No. 2 had been removed from the building and sold for scrap. Boiler No. 1 was still present, but the fuel feed system had been removed so that the unit can no longer be used (References 10A, 11, 37).

Date of Start-Up: Boiler No. 1 was placed in service in 1941. Boiler No. 2 was installed in 1963 (Reference 11.)

Date of Closure: The boilers were last used in 1985. Boiler No. 2 was dismantled and sold for scrap in the late 1980s (Reference 37).

Waste Managed: The unit managed raw, untreated scrap wood and sawdust from wood sawing operations.

Note: Due to the alleged history of illegal waste management activities, there is a concern that wastes other than scrap wood were managed in the unit.

Release Controls: The boilers were located inside a building within a concrete vault or on a concrete floor. Air emissions from the boilers were managed by the Former Wood-Fired Boiler Nos. 1 and 2 Fly Ash Collection System (SWMU No. 12) (Reference 37).

History of Releases: There have been no known releases of hazardous waste or hazardous constituents from the unit, and none were noted during the VSI (Reference 37).

Conclusions: Soil/Groundwater: There was a low release potential to soil and groundwater while the unit was in operation since the unit was located inside within a concrete vault or on a concrete floor. There is currently a low potential for release since the unit is no longer in operation.

Surface Water: The former and present release potential to surface water is low since the unit was located inside a building.

Air: There was a high release potential for particulates while the unit was in operation. The current particulate release potential is low since the unit is no longer in operation. There was and is a low release potential for hazardous constituents since the unit managed scrap wood.

Subsurface Gas: The potential for the generation of subsurface gas is and was low due to the concrete base below the unit.

Unit No.: SWMU No. 17 Photograph No. 1-1

Unit Name: Wood-Fired Boiler No. 4

Unit Description: The unit is located inside Building B-13, which is the powerhouse. The unit consists of a 55 MM BTU Wood-Fired Boiler. The boiler is approximately 20 feet square and 40 feet high. The unit is mounted on a concrete floor within the powerhouse. The wood fuel for the boiler is conveyed to the unit via the Wood Refuse Feed System and Silos (SWMU No. 3). The unit appeared to be in good condition at the time of the VSI (References 18, 37).

Date of Start-Up: The unit was installed in the early 1980s and began operation in 1985 (Reference 37).

Date of Closure: The unit is still in operation.

Waste Managed: The unit manages raw, untreated scrap wood from cutting and sawing operations at the facility.

Release Controls: The unit is located inside a building on a concrete floor. Air emissions from the unit are managed by the Wood-Fired Boiler No. 4 Ash Collection System (SWMU No. 4).

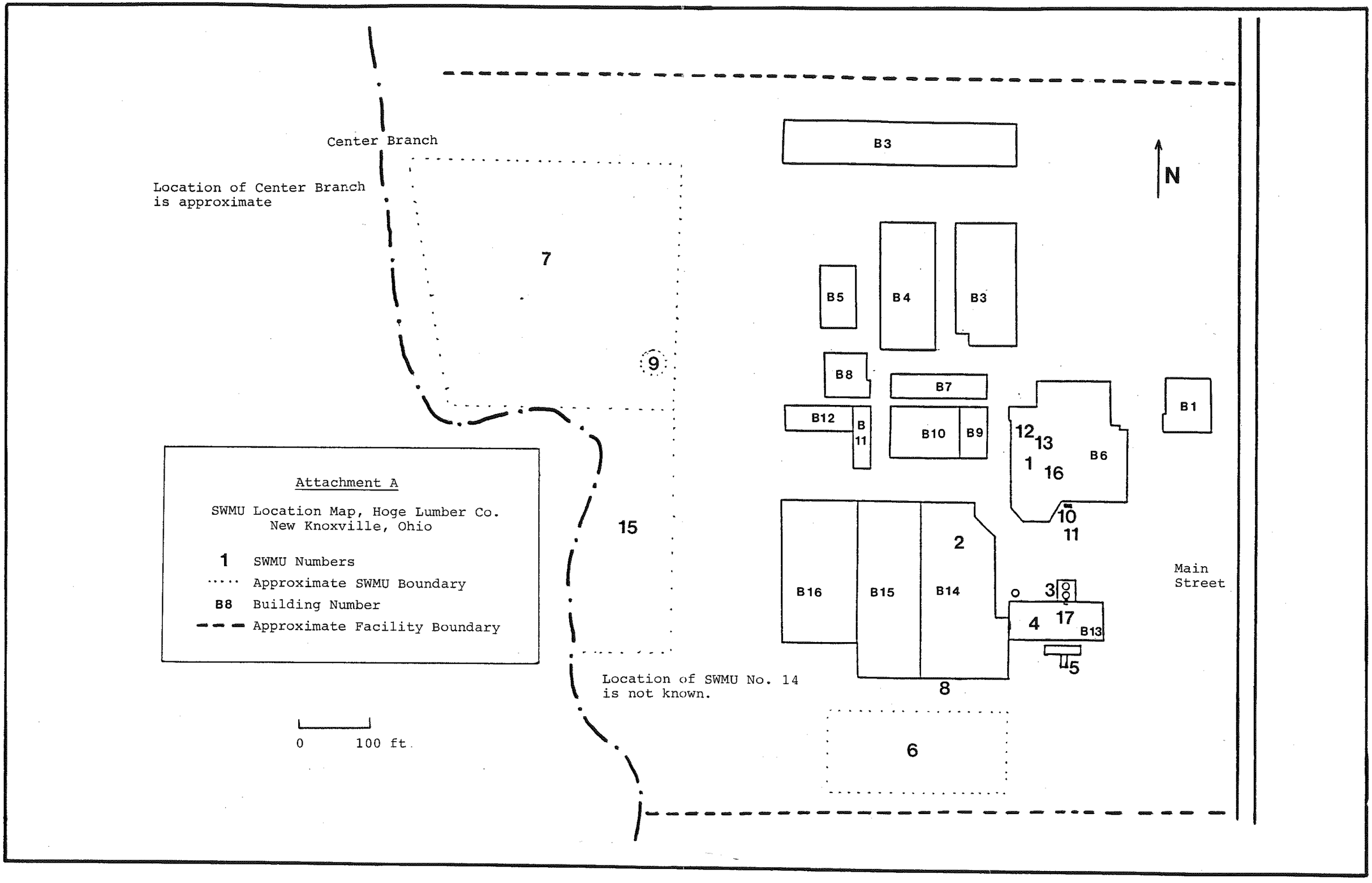
History of Releases: There have been no known releases of hazardous waste or hazardous constituents from the unit, and none were noted during the VSI (Reference 37).

Conclusions: Soil/Groundwater: There is a low release potential to soil and groundwater since the unit is located indoors on a concrete floor.

Surface Water: There is a low release potential to surface water since the unit is located indoors on a concrete floor.

Air: There was a low release potential since releases from the unit are regulated by an Ohio EPA Permit to Install.

Subsurface Gas: The potential for the generation of subsurface gas is low since the unit is located indoors on a concrete floor.


Center Branch
Location of Center Branch is approximate
7
9
15
B3
N
B5
B4
B3
B8
B7
B12
B 11
B10
B9
B1
12
13
1
16
B6
10
11
2
B16
B15
B14
3
4
17
B13
5
8
6
Main Street
Location of SWMU No. 14 is not known.
0
100 ft.
Attachment A
SWMU Location Map, Hoge Lumber Co.
New Knoxville, Ohio
1 SWMU Numbers
Approximate SWMU Boundary
B8 Building Number
Approximate Facility Boundary

5.0 Summary of Suggested Further Actions

Unit No.	Unit Name	Operational Date	Suggested Further Action	Releases Yes/No
1	Green Wood Sawmill Dust Collection System	1957-Present	No further action is suggested since the unit does not manage hazardous waste or hazardous constituents.	No
2	Wood Parts Manufacturing Dust Collection System	1957-Present	No further action is suggested since the unit does not manage hazardous waste or hazardous constituents.	No
3	Wood Refuse Feed System And Silos	Unknown-Present	No further action is suggested since the unit does not manage hazardous waste or hazardous constituents.	No
4	Wood-Fired Boiler No.4 Ash Collection System	1985-Present	No further action is suggested since the unit does not manage hazardous waste or hazardous constituents.	No
5	Wood Ash Loading Area	1985-Present	No further action is suggested since the unit does not manage hazardous waste or hazardous constituents.	No

Unit No.	Unit Name	Operational Date	Suggested Further Action	Releases Yes/No
6	South Wood Ash Disposal Area	Unknown-Present	Soil sampling is suggested within the unit to determine if improper disposal or a release of hazardous constituents has occurred in the area. Samples should be collected from the soil beneath the ash in the unit. The sample should be analyzed for volatile and semi-volatile organics and metals. In addition, the appropriate authorities in the NPDES program should be notified due to the unpermitted runoff from a solid waste disposal area.	No
7	West Wood Ash Disposal Area	Unknown-Present	Soil sampling is suggested within the unit to determine if improper disposal or a release of hazardous constituents has occurred in the area. Samples should be collected from the soil beneath the ash in the unit. The sample should be analyzed for volatile and semi-volatile organics and metals. In addition, the appropriate authorities in the NPDES program should be notified due to the unpermitted runoff from a solid waste disposal area.	No

Unit No.	Unit Name	Operational Date	Suggested Further Action	Releases Yes/No
8	Spray Chamber Waterfall Collection System and Alleged Discharge Area	Unknown-1990	Releases from the unit are being addressed by the Ohio EPA under RCRA Enforcement Authorities. It is suggested that further action at the unit be coordinated with the RCRA Enforcement activities.	No
9	Alleged Solvent Waste Burn Area	Unknown-1990	Releases from the unit are being addressed by the Ohio EPA under RCRA Enforcement Authorities. It is suggested that further action at the unit be coordinated with the RCRA Enforcement activities.	Yes
10	Current Cabinet Finishing Generator Storage Area	1990-Present	No further action is suggested since engineering controls and waste management practices make a release unlikely.	No
11	Former Cabinet Finishing Generator Storage Area	Unknown-1990	Releases from the unit are being addressed by the Ohio EPA under RCRA Enforcement Authorities. It is suggested that further action at the unit be coordinated with the RCRA Enforcement activities.	Yes
12	Former Wood-Fired Boiler Nos. 1 and 2 Flyash Collection System	1957-1985	No further action is suggested since the unit did not manage hazardous waste or hazardous constituents.	No
13	Former Wood Refuse Silo	1957-1985	No further action is suggested since the unit did not manage hazardous waste or hazardous constituents.	No

Unit No.	Unit Name	Operational Date	Suggested Further Action	Releases Yes/No
14	Cooling Tower Discharge Area	1985-present	It is suggested that a sample be collected of the cooling water discharge and analyzed for hazardous constituents. If hazardous waste constituents are detected in the wastewater, then an RFI is suggested for the unit. If hazardous constituents are not detected, then the appropriate NPDES authorities should be contacted concerning the unpermitted discharge.	No
15	Scrap Steel Storage Area	Unknown-present	Soil Sampling is suggested within the unit to determine if a release of hazardous constituents has occurred in the area. Soil samples should be collected to a depth of five feet in areas where empty drums are found. The samples should be analyzed for volatile and semi-volatile organics and metals.	No
16	Former Wood-Fired Boiler Nos. 1 and 2	1941-1985	No further action is suggested since engineering controls would have made a release unlikely.	No
17	Wood-Fired Boiler No. 4	1985-Present	No further action is suggested since engineering controls make a release unlikely. In addition, air emissions from the unit are regulated by Ohio EPA.	No

6.0 REFERENCES

HOGE LUMBER CO.

RCRA/General Files

1990

1. OEPA Complaint Investigation Form, Re: Hoge Lumber Illegally Dumped Drums of Hazardous Waste Near Creek, April 23, 1990.

2. Correspondence from William Palmer, OEPA, to Clark Froning, Hoge Lumber Co., Re: Complaint Inspection, April 30, 1990.

3. RCRA Interim Status Inspection Forms for Hoge Lumber Co., May 7, 1990.

4. Correspondence from Mike Hayes, OEPA, to John Hoge, Hoge Lumber Co., Re: RCRA Inspection, May 1990.

5. Correspondence from William Palmer, OEPA, to Clark Froning, Hoge Lumber Co., Re: Analytical Results, June 12, 1990.

6. Correspondence from John Gartland, Arter & Hadden, to Charles Hall, Hall & Toorkey, Re: Contaminated Soil, August 21, 1990.

7. Correspondence from Kevin Pierard, U.S. EPA, to Clark Froning, Hoge Lumber Co., Re: Notice of Violation, August 27, 1990.

8. Correspondence from John Gartland, Arter & Hadden, to Mike Hayes, OEPA, Re: Hazardous Waste Manifest, October 29, 1990.

9. Correspondence from Susan Ashbrook, Ohio Attorney General's Office, to John Gartland, Arter & Hadden, Re: Violations at Hoge Lumber, October 29, 1990.

Air Files

1973

10. Applications for Permits, Fuel-Fired Indirect Heat Exchangers for Hoge Lumber Co., for:

    a) Boiler No. 1
    b) Boiler No. 2
    c) Boiler No. 3

    May 17, 1973.

1977

11. Ohio Environmental Protection Agency, (OEPA), Renewal Applications for a Permit to Operate Air Contaminant Source for Hoge Lumber Co., for:

    a) Boiler No. 1
    b) Boiler No. 2

    March 15, 1977.

12. OEPA, Application Denial for a Permit to Operate Boiler No. 1 at Hoge Lumber Co., August 19, 1977.

13. OEPA, Application Denial for a Permit to Operate Boiler No. 2 at Hoge Lumber Co., October 14, 1977.

1978

14. Applications for a Permit or Variance to Operate an Air Contaminant Source at Hoge Lumber Co., for:

    a) Boiler No. 1
    b) Boiler No. 2

    May 19, 1978.

1982

15. Appendix A, Process Data for Hardwood Sawmill at Hoge Lumber Co., June 17, 1982.

16. Appendix A, Process Data for Hardwood Manufacturing at Hoge Lumber Co., June 17, 1982.

17. Appendix D, Surface Coating Operation at Hoge Lumber Co., June 17, 1982.

1983

18. Correspondence from Patricia Walling, OEPA, to John Hoge, Hoge Lumber Co., Re: Permit to Install, May 25, 1983.

1984

19. Correspondence from Gerald Rich, OEPA, to John Hoge, Hoge Lumber Co., Re: Visible Emissions Problems, October 4, 1984.

20. OEPA Application for a Permit to Operate an Air Contaminant Source at Hoge Lumber Co., October 8, 1984.

1986

21. Correspondence from John Hoge, Hoge Lumber Co., to Dean Twining, OEPA, Re: Application for Permit to Operate, April 22, 1986.

1989

22. Correspondence from Don Wattermeyer, OEPA, to John Hoge, Hoge Lumber Co., Re: Air Files, February 13, 1989.

23. Correspondence from Don Wattermeyer, OEPA, to John Hoge, Hoge Lumber Co., Re: Upgrading Control System, November 1, 1989.

1990

24. Correspondence from Elizabeth Wick, OEPA, to Clark Froning, Hoge Lumber Co., Re: Industrial Waste, June 5, 1990.

25. Correspondence from Richard Carleski, OEPA, to John Hoge, Hoge Lumber Co., Re: Follow-up Inspection, July 2, 1990.

26. Correspondence from John Hoge, Hoge Lumber Co., to Richard Carleski, OEPA, Re: Particulate Emission Problem, July 31, 1990.

Water Files

27. Correspondence from Douglas Scharp, OEPA, to John Hoge, Hoge Lumber Co., Re: Violation Public Water Supply, January 19, 1990.

28. OEPA, Division of Public Water Supply, Evaluation and Inventory Report for Hoge Lumber Co., February 13, 1990.

29. Correspondence from John Schwartz, OEPA, to John Hoge, Hoge Lumber Co., Re: Non-Community Water Supply, March 7, 1990.

30. Inter-Office Communication from Doug Scharp, OEPA, to Jeff Steers, OEPA, RE: Sampling at Hoge Lumber Co., June 15, 1990.

31. Inter-Office Communication from Chi Ko, OEPA, to Heidi Sorin, OEPA, Re: Stormwater Discharge, August 15, 1990.

32. Correspondence from John Schwartz, OEPA, to John Hoge, Hoge Lumber Co., Re: Water Analysis, November 1, 1990.

Miscellaneous Files

33. N.M. Fenneman, Geology of Cincinnati and Vicinity, Geological Survey of Ohio, Bulletin No. 19, 1916.

34. N.M. Fenneman, Geological of Cincinnati and Vicinity, Geological Survey of Ohio, Bulletin No. 19, 1916.

35. R.P. Goldthwait, G.W. White, and J.L. Forsyth, Glacial Map of Ohio, U.S.G.S. Miscellaneous Investigations Map I-316, 1961 (revised 1967, reprinted 1979).

36. J.A. Bownocker, Geologic Map of Ohio, ODNR Division of Geological Survey, 1920 (revised 1947, reprinted 1981).

37. VSI Field Notebooks, Visual Site Inspection of Hoge Lumber Co., New Knoxville, Ohio; April 8, 1991; Two Notebooks.

38. Facility Record of Air Permit Applications, Ohio EPA Files, No date or author.

39. Climate of Ohio, Climate of the States, Gales Research Company, 1985.

40. Soil Conservation Service, United States Department of Agriculture, Soil Survey of Auglaize County, Ohio; December 1981.

41 Groundwater Resources of Auglaize County; Richard J. Kostelnick, Ohio Department of Natural Resources, 1983.

42. Glacial Map of Ohio, Richard P. Goldthwait, George W. White, and Jane L. Forsyth; Ohio Department of Natural Resources, 1967.

43. Chemical Analysis of water from facility wells; Provided by the facility during the VSI.

44. U.S.G.S. Quadrangle Map, New Knoxville, Ohio, Original 1961, Photo Revised 1973.

45. Telephone Log, Dave Walker, A.T. Kearney with Tyler Ruggles and Jeff Steer, Ohio EPA; Re: Results of Metals Analysis of Flyash at Hoge Lumber May 9, 1991.

ATTACHMENT B

Visual Site Inspection Summary

The Visual Site Inspection (VSI) Summary and VSI Photograph Log (Attachment C) document the activities and observations of representatives of A.T. Kearney during the VSI conducted on April 8, 1991 at the Hoge Lumber Company facility.

The following individuals participated in the VSI:

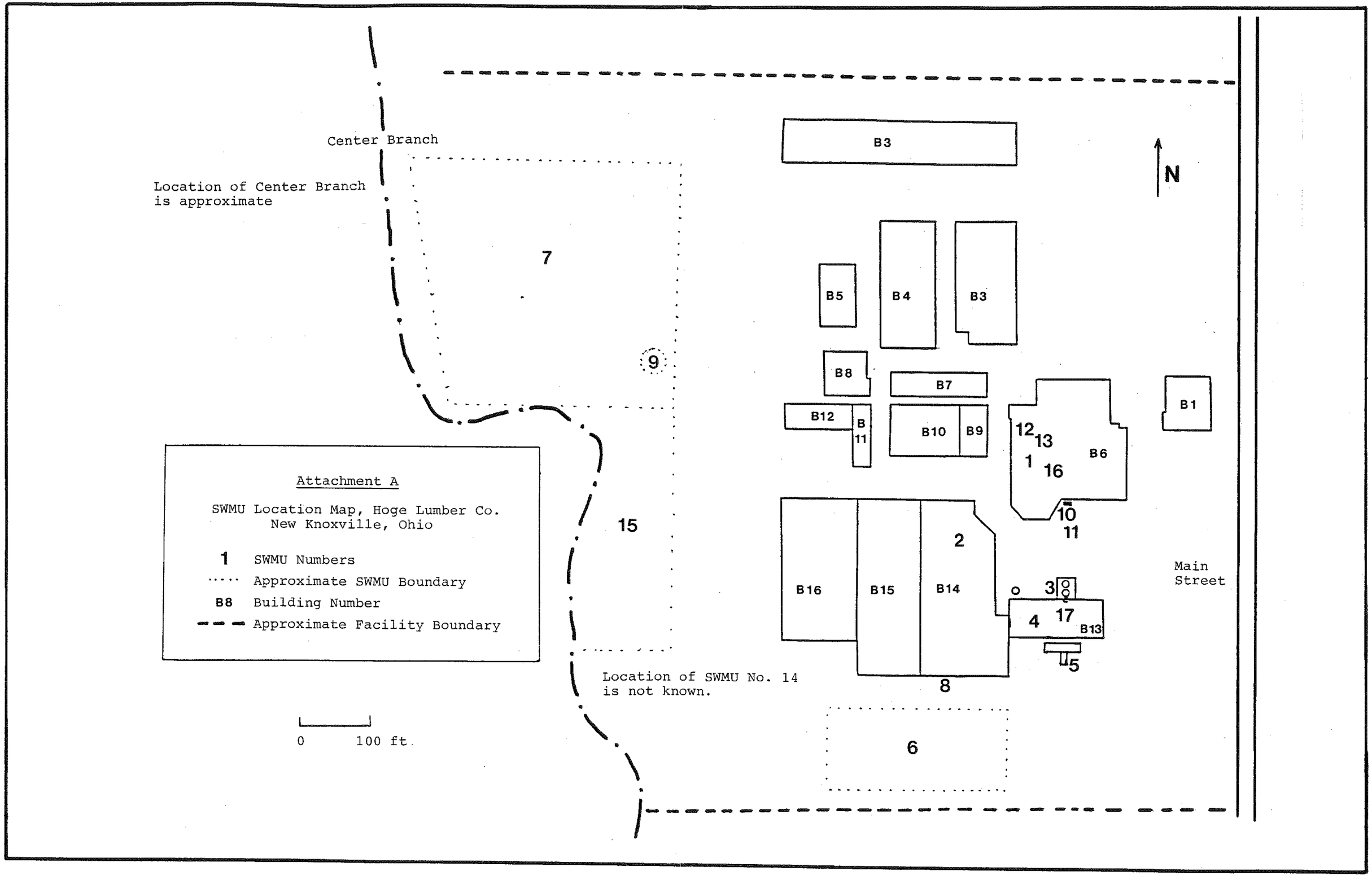
Dave Walker	A.T. Kearney
June Dreith	A.T. Kearney
John H. Hoge, P.E.	Hoge Lumber Co.
Clark Froning	Hoge Lumber Co.
John P. Gartland	Arter & Hadden

The investigation team assembled at the Hoge Lumber Company facility at 8:30 a.m. Attendees began the introductory meeting with a discussion of the RFA process, the role of the VSI in that process, and the Corrective Action Program of the U.S. EPA.

The facility representatives briefly described the operations at the Hoge Lumber facility. The facility is used to process whole logs into board lumber as well as finished products. Mr. John P. Gartland (Attorney for Hoge Lumber) discussed the current regulatory status of the facility as well as the potential criminal proceedings which are being contemplated by the State of Ohio. Mr Gartland explained that due to the criminal proceedings, he would like to defer answers to some of our questions to a letter which he would prepare and send to us. The facility representatives then gave us a brief history and description of each of the SWMUs on our preliminary list. The meeting was concluded at 10:00 a.m.

The VSI began at 10:15 a.m. The inspection proceeded until all of the potential SWMUs had been inspected. Due to the relatively small size of the facility and the low number of units, the inspection took only 2.25 hours. Photographs were taken by Dave Walker using a 35 mm camera and 1600 ASA Fuji color print film. The team finished the VSI at 12:30 p.m.

The closing meeting was held from 1:30 p.m. to 2:00 p.m. The meeting encompassed closing remarks and questions. The VSI team indicated to the facility representative that questions would be forthcoming and directed to the facility via correspondence or telephone contact. Mr. Gartland indicated that he would draft a letter addressing questions posed during the VSI during the week of April 20, 1991.



Attachment A

SWMU Location Map, Hoge Lumber Co.
New Knoxville, Ohio

1 SWMU Numbers

····· Approximate SWMU Boundary

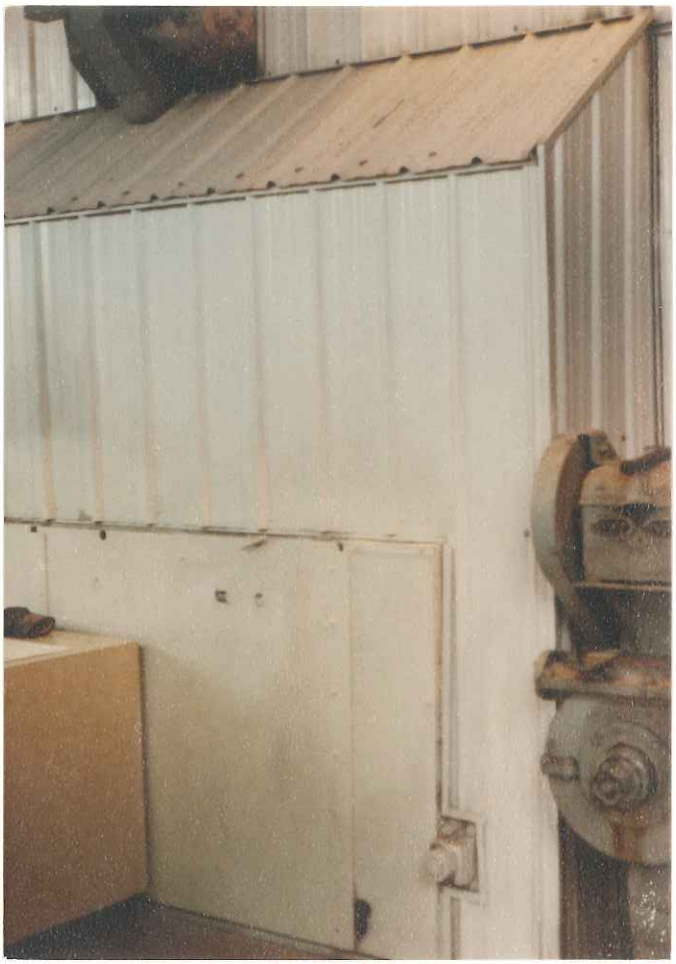
B8 Building Number

— — — Approximate Facility Boundary

ATTACHMENT C

PHOTOGRAPH LOG

Photographs taken by Dave Walker on April 8, 1991 using a Nikon 35 mm camera and 1600 ASA Fuji Film.



Photograph 1-1 Hoge Lumber, April 8, 1991

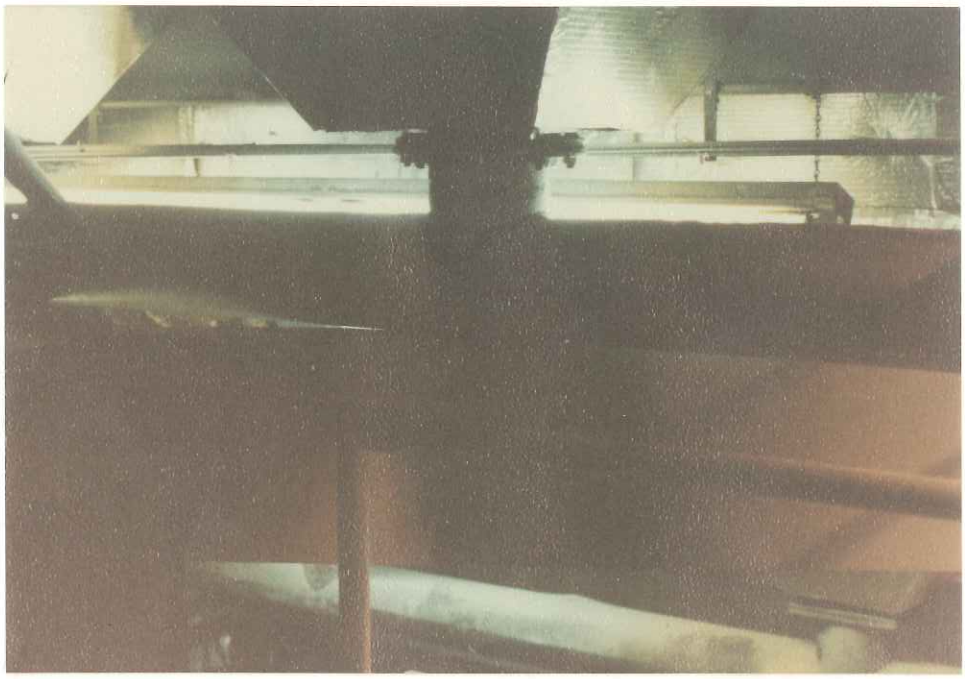
Looking northwest at Wood-Fired Boiler No. 4 (SWMU No. 17).

Photograph 1-2 Hoge Lumber, April 8, 1991

Looking northwest at the discharge of the screw conveyor, which is part of the Wood Refuse Feed System and Silos (SWMU No. 3), into the Wood-Fired Boiler No. 4 (SWMU No. 17).

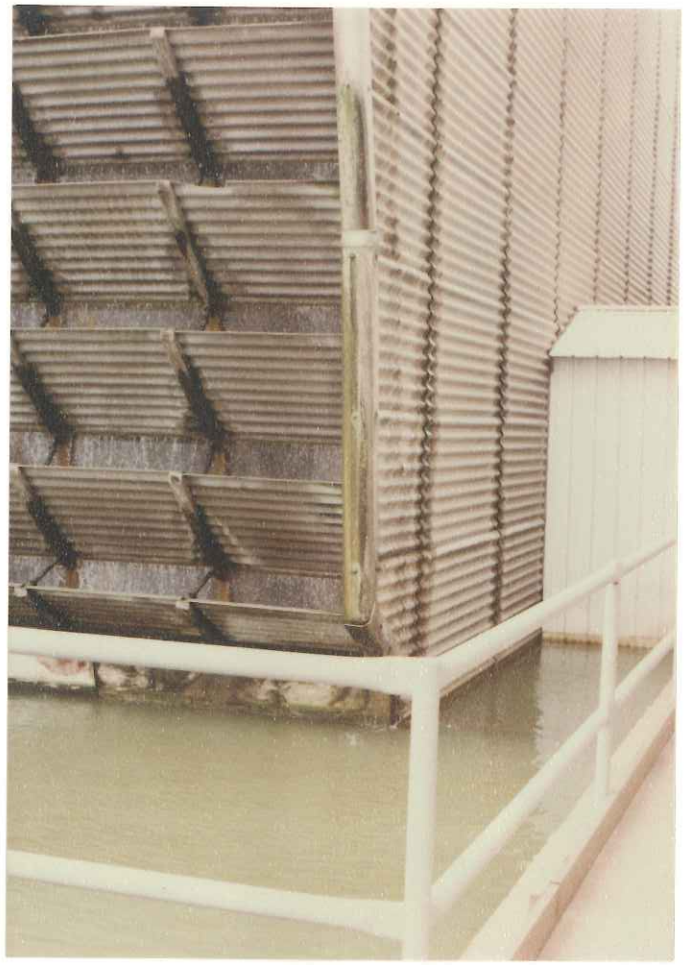
Photograph 1-3 Hoge Lumber, April 8, 1991

Looking south at the Breslove Collector which is part of the Wood-Fired Boiler No. 4 Ash Collection System (SWMU No. 4).



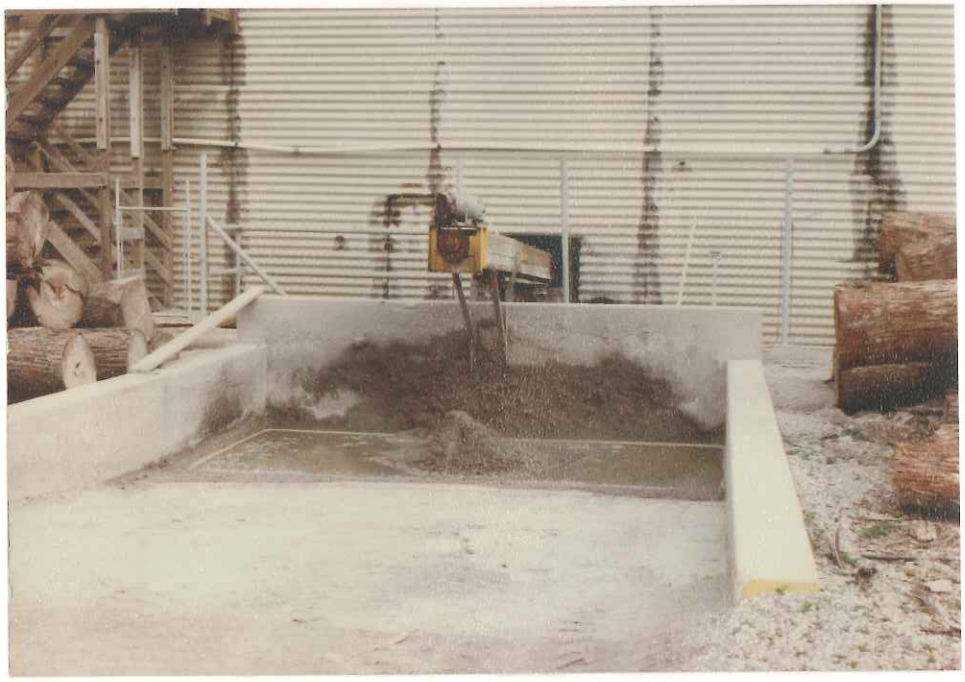
Photograph 1-4 Hoge Lumber, April 8, 1991

Looking northwest at the hopper and dropout point for the firebox grates which is part of the Wood-Fired Boiler No. 4 Ash Collection System (SWMU No. 4).



Photograph 1-5 Hoge Lumber, April 8, 1991

Looking west at the cooling tower for Wood-Fired Boiler No. 4 (SWMU No. 17).



Photograph 1-6 Hoge Lumber, April 8, 1991

Looking North at the Wood Ash Loading Area (SWMU No. 5). The standing water in the unit is from precipitation. The unit has no outlet and the water is allowed to evaporate.

Photograph 1-7 Hoge Lumber, April 8, 1991

Looking northwest at the alleged discharge area of the Spray Chamber Waterfall Collection System and Alleged Discharge Area (SWMU No. 8). The discharge pipe is visible just above the concrete foundation.

Photograph 1-8 Hoge Lumber, April 8, 1991

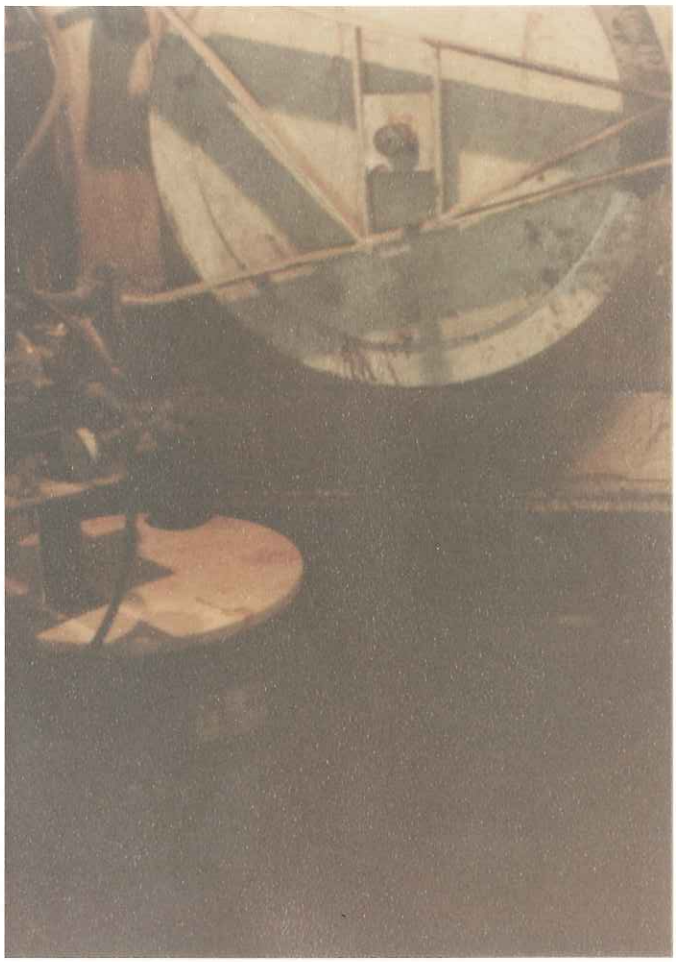
Looking southeast at the South Wood Ash Disposal Area (SWMU No. 6).

Photograph 1-9 Hoge Lumber, April 8, 1991

Looking south at the South Wood Ash Disposal Area (SWMU No. 6). The Center Branch is located adjacent to the trees in the background.

Photograph 1-10 Hoge Lumber, April 8, 1991

Looking southeast at the quench tank which is part of the Spray Chamber Waterfall Collection System and Alleged Discharge Area (SWMU No. 8). The discharge pipe is visible in the top of the photograph.



Photograph 1-11 Hoge Lumber, April 8, 1991

Looking south at the Nordson spray chamber used to apply a lacquer finish to final products.

Photograph 1-12 Hoge Lumber, April 8, 1991

Looking Southwest at the Scrap Steel Storage Area (SWMU No. 15). Several empty drums are visible in the left center of the photograph.

Photograph 1-13 Hoge Lumber, April 8, 1991

Looking northwest at the West Wood Ash Disposal Area (SWMU No. 7).

Photograph 1-14 Hoge Lumber, April 8, 1991

Looking west at the Alleged Solvent Waste Burn Area (SWMU No. 9). Note the vegetation and woodchuck hole in the bottom center of the photograph.

Photograph 1-15 Hoge Lumber, April 8, 1991

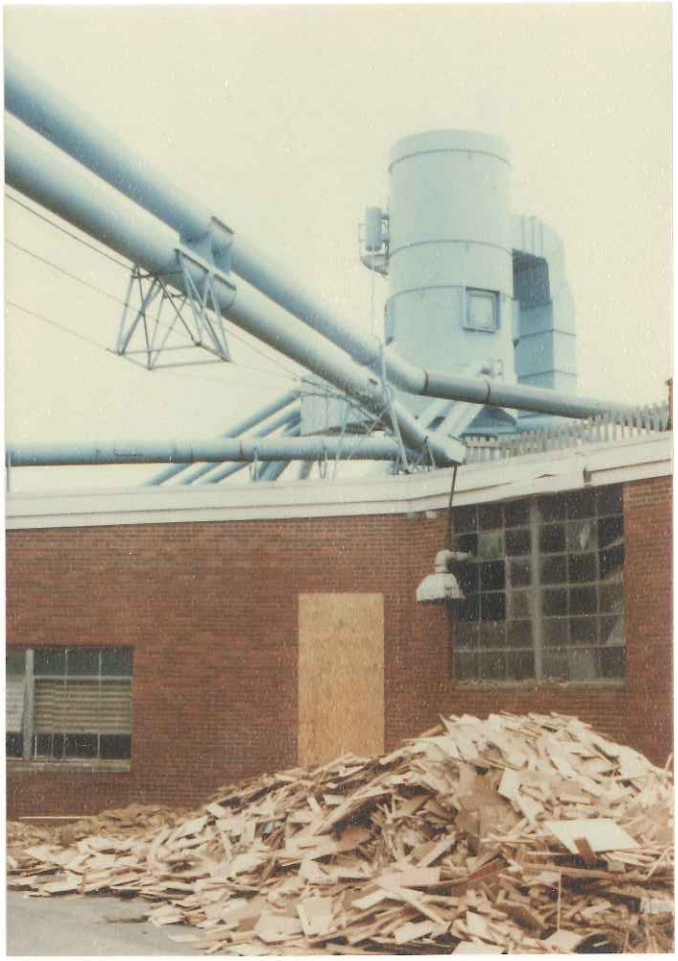
Looking east at the location of a former underground fuel oil storage tank. The tank is in place but has been filled with a bentonite/ cement slurry.

Photograph 1-16 Hoge Lumber, April 8, 1991

Looking east at the location of two former 500 gallon fuel oil storage tanks. The tanks have been removed from the property.

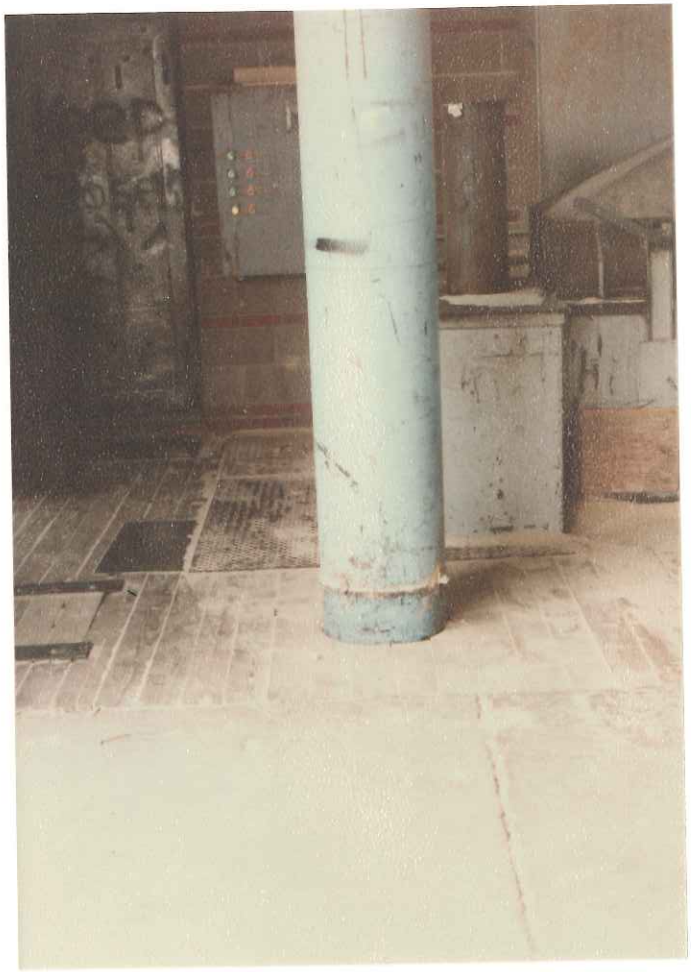
Photograph 1-17 Hoge Lumber, April 8, 1991

Looking east at the baghouse and piping for the Green Wood Sawmill Dust Collection System (SWMU No. 1). The baghouse and piping are light blue colored. At left, the purple silo is the Former Wood Refuse Silo (SWMU No. 13).



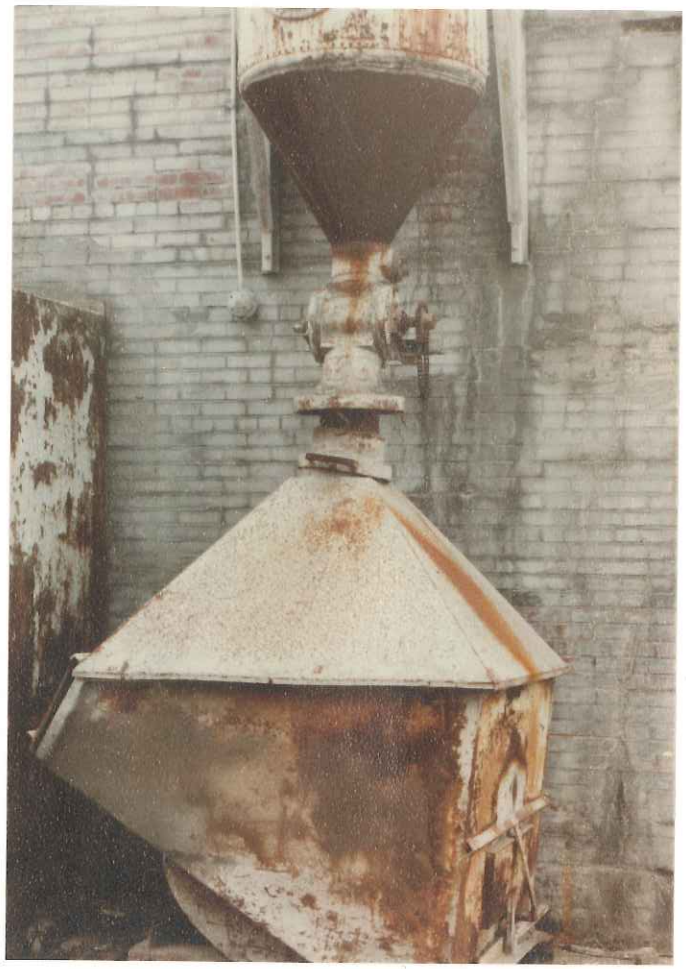
Photograph 1-18 Hoge Lumber, April 8, 1991

Looking southwest at the baghouse and piping for the Wood Parts Manufacturing Dust Collection System (SWMU No. 2).



Photograph 1-19 Hoge Lumber, April 8, 1991

Looking north at the dropout for the Green Wood Sawmill Dust Collection System (SWMU No. 1) into the screw conveyor of the Wood Refuse Feed System and Silos (SWMU No. 3).

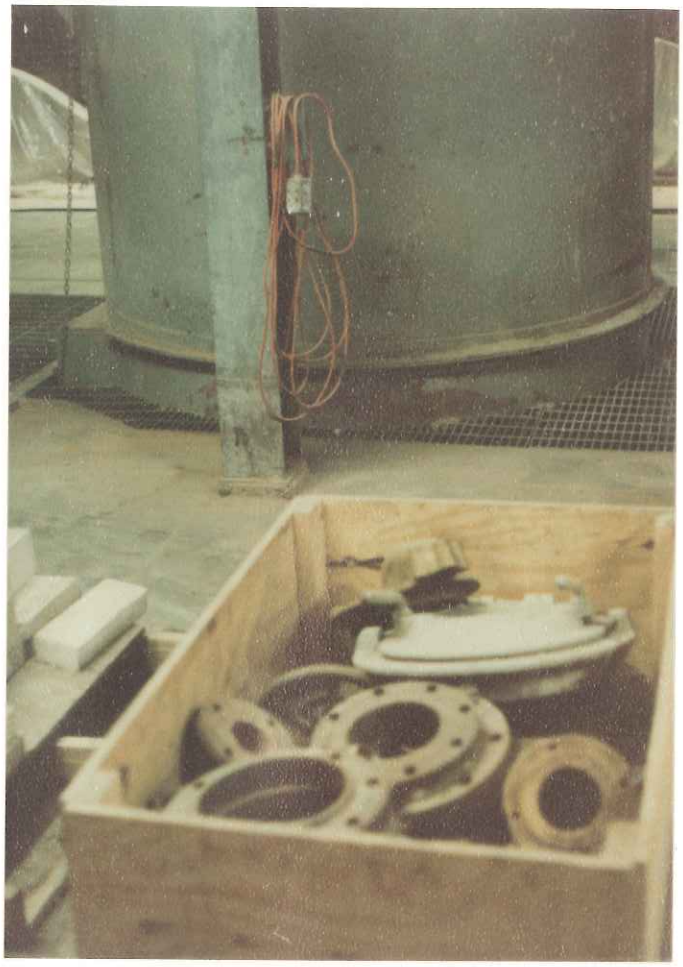


Photograph 1-20 Hoge Lumber, April 8, 1991

Looking southwest at the outdoor cyclone and hopper of the Former Wood-Fired Boiler Nos. 1 and 2 Flyash Collection System (SWMU No. 12).

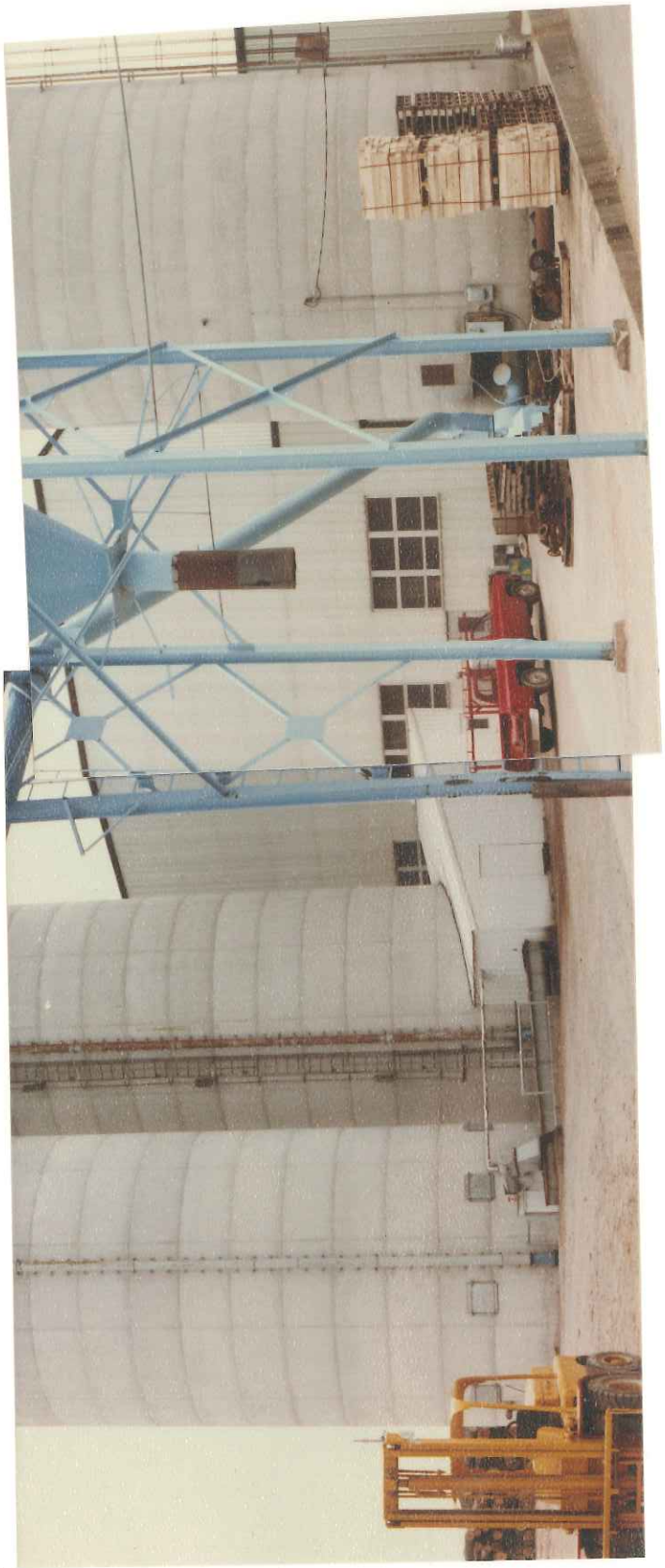
Photograph 1-21 Hoge Lumber, April 8, 1991

Looking east at the location of the existing 8000-gallon underground fuel oil storage tank.



Photograph 1-22 Hoge Lumber, April 8, 1991

Looking south at the location of the Former Wood-Fired Boiler Nos. 1 and 2 (SWMU No. 16). Boiler No. 2 was located beneath Boiler No. 1.



Photograph 1-23 and 1-24 Hoge Lumber, April 8, 1991

Looking southeast at the concrete storage silos which are part of the Wood Refuse Feed System and Storage Silos (SWMU No. 3).

Photograph 1-25 Hoge Lumber, April 8, 1991

Looking west at the Current Cabinet Finishing Generator Storage Area (SWMU No. 10).

Photograph 1-26 Hoge Lumber, April 8, 1991

Looking north at the Former Cabinet Finishing Generator Storage Area (SWMU No. 11).

ATTACHMENT D

VSI FIELD NOTES

①

0830 Arrive at Facility
met with
John Hoge
Clark Froning } Hoge Lunch
John Gartland - Lawyer

They had meeting with
Ohio Attorney General

Goal of Agency
Close problem
and
Submitting a
Proof of Clean
Closure.

4/8/91

(1)

(2)

(3)

Attorney General
Plans to Prosecute.
for criminal
violations.
John Gartland will
answer all questions
Any questions they
are not comfortable
answering immediately
will be answered
in a Letter form
Gartland (Hoge's Attorney
to us (ATK) within
one week.

4/8/91

(5)

Boiler # 1 and 2
have been taken
out of Service
Boiler # 1 started
1941 . Breslove Early 1950's
Air treatment has
been in place ~~since~~
for 1935

Has not been in
Service for 5 years
US EPA says
Must have all
Controls
So they took
out of service.

4/8/91

(5)

(6)

Boiler # 2 and #2
have been taken.
out of service
Blank 4/8/91
Boiler # 2 started
1941. Breslove Est 1955
Air treatment has
been in place since
for 1955

Has not been in
Service for 5 years
US EPA says
Must have all
controls
So they took
out of service.

(7)

2 was put in
in 1963.

Also removed from
Service 5 years ago.

Had a Buell
multclone.
Put in when boiler
was in service.
Also stopped approx
5 Years ago.

4/8/91

(8)

2 was put in in 1963.

Also removed from Service Blank Year ago.

4/8/91

Had a Buell multiclone.

Put in when boiler was in service.

Also stopped approx 5 Years ago.

(9) Boiler #2 everything

In one case Furnace removed.

One case Feed Removed. on # 1

Particulate controls must be on even emergency

Furnace was scrapped

Turbine moved to other powerplant.

4/8/91

Boiler #2 every [illegible]
In one case
Furnace removed.

One case Feed
Removed. on #1

Blank 4/8/91

Particulate controls
must be on even
emergency

Furnace was scrapped
Turbine moved to
other powerplant.

units burned
only untreated
wood.
mostly
Off of sawmill
Some has been
Kiln Dried.

#2 Boiler was
Set up for #2
Heating oil
Have not done
that.
Too Expensive.
originally an oil.

4/8/91

(12)

units burned
only untreated
wood.
mostly
off of sawmill
Some has been
kiln dried.
Blank 4/8/91
#2 Boiler was
set up for #2
Heating oil
Have not done
that.
Too Expensive.
originally on oil.

(11) (13)

Material dropped
out into a
hopper that can
be picked up with
a dampster.

cyclone waste was
put into a
waste pile
probably

Detrix cell ~~at~~
Fire box. No

4/8/91

(13) (14)

Material dropped out into a hopper that can be picked up with a dumpster.

Blank 4/8/91

Cyclone waste was put into a waste pile probably

Detrix cell in fire box. No

(81) (15)

bottom ash generated wood burned right on floor.

Any ash

No provision to get ash out when unit is in operation

4/8/91

(18)

bottom ash generated
wood burned
right on floor.

Any ash

Blank 4/8/91

no provision to
get ash out when
unit is in operation

(18)

Boiler #3.
55 MM Btu/H

1985 in service.

Boiler is oversized
compared to Turbine

unit has never
been operated
at capacity

2 Drop out Hoppers

2 combined underoptimizer

2 under Breaching

4/8/91

(18)

Boiler #3.

55 MM Btu/H

Blank

1985 in service.

4/8/91

Boiler is oversized compared to Turbine

unit has never been operated at capacity

2 Drop out Hoppers

2 combined underoptimized

2 under Breaching

(19)

(02) Breslove

Drop out combines

Air Pollution control system.

Also burns only Raw wood

In operation 5 Days per week,

4/8/91

(20)

Blank

(21)

Green wood.

Baghouse Drops in to screw. Feeds into Silos. Same system as Sawmill wastes.

Baghouse in operation for approximately 8 years.

4/8/91

(21) (22) #

Green wood.

Baghouse Drops
into screw.
Feeds into
Silos. Same
System as Sawmill
wastes.

Blank 4/8/91

Baghouse
in operation
for approximately 8 years.

(24) (23)

Prior to that
a Dust collector
on top of Bldg.

Dropped out
to a silo that
served the old
Boilers. All
have been removed.

Baghouse still in
0

4/8/91

Blank 4/8/91

make backs for
Brusher
Spray Laquer
Nordsen Spray Booth.
Curtain prevents
fumes from
getting out at
either end.

4/8/91

(25) (26)

Make backs for
Brusher
Spray Laquer
Nordsen Spray Booth.
Curtain prevents
fumes front
getting out at
either end.

Blank 4/8/91

(28) (27)

wood Parts Mfg
System Baghouse
Carter Day 376
Same as Green
wood.

older than other.
approx 1980.

untreated woods
Drops into another
collections syten
winds up in silos.

4/8/91

(27) (28)

Wood Parts Mfg.
System Baghouse
Carter Day 376
Same as Green
Wood.

Blank 4/8/91

Older than other.
approx 1980.

untreated woods
Drops into another
collections system
winds up in silos.

(30) 4/8/91 (29)

within Spray
Booth.
2 curtains
collect overspray
than recirculated
into Tank.

Spray Booth began
Approx 1970.

Sray Laquer
High solids
Hot Airless.
Max solids Minimum
solids

within Spray
Booth.
2 curtains
collect overspray
than recirculated
into Tank.

Blank 4/8/91

Spray Booth began
Approx 1970.

Spray Laquer
High Solids
Hot Air less
Max Solids Minimum
Solids

Laquer dries
approx 2 minutes.

Over spray from
booth falls to
floor trench
System than
to viscosemeter.
Adds solvent
and recycles.

4/8/91

Blank

4/8/91

Floor Trench system recovers over spray then recycles

Maintence buildup on other side.

All ~~da~~ goes back to drum and is reused.

Recycler has been used since started in 1970.

4/8/91

(33) (34)

Floor Trench
system recovers
over spray then
recycles

Blank

Maintence building
on other side.

4/8/91

All ~~do~~ goes back
to drum and is
reused.

Recycler has
been used since
started in 1970.

(35)

The wood finishing
did not occur
prior to 1970.

---

we will
be intersted
in Amount
of waste
where it ~~whe~~ went
period of operation
chemical.

4/8/91

The wood finishing did not occur prior to 1970.

Blank 4/8/91

We will be interested in Amount of waste where it whenever period of operation chemical.

only waterfall collection system.

Area where cleaning has same collection system.

Solvents used for cleaning drums are recirculated along with overspray

4/8/91

4/9

(38)

Only waterfall collection system.

Area where cleaning same has collection system.

Blank

4/8/91

Solvents used for cleaning drums are recirculated along with overspray

(39)

Finnish Room where wood for cabinets special orders only cleaning of Equipment where Solvents are used.

Accumulated in a 55 Gallon Drum. Then disposed of offsite.

4/8/91

Manifested.
offsite

No Φ Storage
of waste onsite
Removed immediately
to outside.

mostly clear Laquer.

Cabinets are stained
occasionally.
No paint used.

4/8/91

Finish Room
where wood
for cabinets
special orders only
Cleaning of
Equipment where
so inserts are
used. 4/8/91

Accumulated
in a 55 Gallon
Drum. Then
disposed of
offsite.

Manifested.
offsite

No Storage
of waste onsite
Removed immediately
to outside.

Mostly clear layer.

Blank 4/8/91

Cabinets are stained
occasionally.
No paint used.

upstairs on
a wood floor.

wood Refuse silos
Four units

Blue one served
old power plant

2 used Directly
for storage
of Fuel

Last one is overflow

4/8/91

(44)

upstairs on
a wood floor.

wood Refuse silos
Four units
Blank 4/8/91
Blue one served
old power plant

& used Directly
for storage
of Fuel

Last one is overflow

(45)

ceased 5 years ago
about steel
Put in
in approx
1957

Blue one
14 D.X 34 High

Closed top
24' Diame 60' Tall
concrete silos.

Poured concrete
Pad beneath Them

Started approx
Late 1970's

1982

4/8/91 1986 Last one.

All waste is
burned onsite
Never been taken
offsite
Can't be removed
except to Furnace.

4/8/91

(48)

All waste is
burned onsite
Never been taken
offsite
Can't be removed
except to furnace.

Blank 4/8/91

(49)

west Ash pile.

Contain same
Material
wood ash. only.

Bulk of waste
is dumped off
grates.

Plant always
operated with
wood energy

4/8/91

(50)

West Ash pile.

Contain same material

wood ash only.

Blank 4/8/91

Bulk of waste is dumped off grates.

Plant always operated with wood energy

(51)

Facility began operation in 1914

wood Ash has accumulated since.

Facility would like to use as a base for roadways

Will Explose with Ohio EPA.

4/8/91

(52)

Facility began operation in 1914 wood Ash has accumulated since.

4/8/91 Blank

Facility would like to use as a base for roadways will explore with Ohio EPA.

(53)

Hoge Lumber has Not Analysis ~~has~~ the waste Ash

April / May Last year Ohio EPA May have taken Samples.

one Letter taken Sample - No organic but heavy metals not done.

4/8/91

54

Hope Lumber has
Not Analysis
~~has~~ the waste Ash

April / May last
year Ohio EPA
May have taken
Samples.

Blank
4/8/91

One Letter taken
Sample - No
organic but heavy
metals not done.

55

All wood waste from
operations goes
directly to silos.

They grind up wood
scraps using a
chipper then
into silos.

4/8/91

(56)

All wood waste from operations goes directly to silos.

They grind up wood scraps using a chipper then into silos.

Blank

4/8/91

(5.)

A specific burn area where for a short period of time soil testing - some removal and incineration.

Asked Approx dates / Timeframe volume /

~~60~~ 65-55 gallon drums Toluene xylene contaminant soil removed.

4/8/91

(58)

A specific burn
area where
for a short period
of time
soil testing - some
removal and incineration
Asked
Approx dates / Timeframe
volume /

Blank
4/8/91

~~60~~ 65-55 gallon
drums Toluene
xylene contaminant
soil removed.

waste solvent
disposal area.
we will be allowed
to take a picture
of alleged area.

Ash storage Area
Surface runoff
goes to creek.

4/8/91

(60)

Blank

(61)

Less than 1/2 mile to creek.

There are blowdowns from Boiler and possibly from Cooling Tower.

~~sto~~ DMW 4/8/91.

Currently goes to stream

~~Poter~~ will eventually go to POTW.

4/8/91

(62)

Less than ½ mile
to creek.

Blank 4/8/91

There are blowdowns
from Boiler
and possibly
from cooling tower.

~~Sh~~ JMW 4/8/91.

Currently goes
to stream
Poter will eventually
go to POTW.

(63)

Algecide
from cooling tower.
New unit.

Property was
woods prior to
the beginning
of operations.

4/8/91

(6-4)

Algae side
from cooling tower.
New unit.

Blank 4/8/91

Property was
woods prior to
the beginning
of operations.

(5)

2 underground Tanks

1 Filled with slurry
6000 Gallon Tank

1 used as Fuel
Storage #2 Fuel
Serves oil
Boiler #4

Tank that was
filled was under
a building so
they filled it.
November of 1989
No leak testing. 4/8/91

66

Underground Tanks

1 Filled with slurry
6000 Gallon Tank

1 Used as Fuel
Storage #2 Fuel
Serves oil
Boiler #4

Blank

4/8/91

Tank that was
filled was under
a building so
they filled it.
November of 1989
No leak testing.

67

2 other Tanks were
removed. All #2

Small tanks
visual inspection
by local Fire chief
No leaks found
2-500 gallons

The tank in service
is 1965 25 years

8000 Gallon
No testing to date.

Fill Area is Surrounded
by concrete

4/8/91

2 other Tanks were removed. All #2

Small tanks
visual inspection
by local Fire chief
No leaks found
2-500 gallons

Blank 4/8/91

The tank in service
is 1965 25 years

8000 Gallon
No testing to date.

Fill Area is Surrounded
by concrete

No major spills
Known.

1015 Begin Tour.

B-13 is powerhouse.

wood from silos
goes throug screw
conyer. Closed steel
Conveyor within
concrete trough
or concrete Floor
Feeds Boilers.

4/8/91

(70)

No major spills known.

1015 Begin Tour.

B-13 is powerhouse.

Blank 4/8/91

wood from silos goes through screw conveyor. closed steel conveyor within concrete trough or concrete floor feeds boilers.

1025

(71)

photo 1-1 and 1-2

Looking Northwest at Boiler # 3. within Building on concrete Floor.

Base of unit and Screw Conveyor.

4/8/91

(22)

1032

Photo 1-1 and 1-3
looking Northwest
at Boiler # 3.
within building
on concrete floor.
Bags of unit
and screw
conveyor.

Blank

4/8/91

1030

(23)

Photo 1-3 Looking
South ~~West~~ East at the
2 stage Breslove
Collector for
3 Boiler
About 5 stories
up
unit is steel
about 10' long
Five feet high
conical bottom
drops to screw
conveyor for
Boiler grates

4/8/91

(74)

1030

Photo 1-3 Looking
southwest at the
2 stage Breslowe
Collector for
#3 Boiler
About 5 stories
up
unit is steel
about 10' long
Five feet high
conical bottom
drops to screw
conveyor for
Boiler grates

Blank 4/8/91

1033

(75)

Photo 1-4
Looking Northwest
at the dropouts
for the Firebox
grate. and
the dropouts
for.
Steel into steel
pipes with screw
conyeros.
above concrete
Floor.

Blank 4/8/91

(26)

1033

Photo 1-4

Looking Northwest
at the Dropouts
for the Firebox
grate. and
the Dropouts
for
Steel into Steel
Pipes with Screw
conyeros.
above Concrete
Floor.

Blank 4/8/91

(7)

1037 Photo 1-5

Looking west
at the cooling Tower
for #3 Boiler
unit is about 30'
high a 30' wide
60' Long.
with a concrete
holding dump
40 ft X 120
Approx 4' of
water.

4/8/91

(28)

Ø37 Photo 1-5

Looking west

at the cooling tower

for #3 Boiler

unit is about 30'

high & 30' wide

60' long.

with a concrete

holding dump

40 ft x 120

approx 4' of

water.

Blank 4/8/91

(9)

Cooling water has an algeide and is currently discharged to creek w/o NPDES.

will soon go to POTW.

Recirculated 99%

TDS Buildsup.

Fresh makeup water

winter hardly run at all.

4/8/91

(80)

Cooling water has
an algeside
and is currently
discharged to
creek w/o NPDES.
will soon go to
POTW.
Recirculated
99%
TDS Buildup.
Fresh makeup
water
winter hardly
run at all.

Blank
4/8/91

(6)

Ash that comes
of grate.
and Breslowe
Screw conyeror
to South side of
Building. Drops
out to a Concrete
Loading Ramp
Approx 12' wide
3 feet deep. Storm
Grey Ash. water
Evaporates no
outlet.

4/8/91

(82)

Ash that comes
off grate.
and Breslowe
Screw conveyor
to South side of
Building. Drops
out to a concrete
Loading Ramp
Approx 12' wide
3 feet deep. Storm
Grey Ash. Water
Evaporates no
outlet.

Blank 4/8/91

(83)

1045 Photo 1-6

Looking North
at Ash outlet
from # 3. Boiler.

Cooling Tower
in Bkg.

Approxiate 23
Acres. owned.
Active Facility
Company owns
More property.

4/8/91

(84)

1045 Photo 1-6

Looking North

at Ash outlet

from # 3. Boiler.

Cooling Tower

in Bkg.

Blank 4/8/91

Approximate 25

Acres. owned.

Active Facility

Company owns

More property.

Public supply (35)

Limestone wells

210' Deep under

artesian conditions

4-8-91 Photo 1-7

1047 Looking NW

Alleged

the Former outlet

from water fall

spray curtain.

South side of

Building

Area is gravel

covered. 4/8/91

(86)

Public Supply
Limestone Wells
210' deep under
artesian conditions

Blank 4/8/91

4-8-91 Photo 1-7

1047 Looking NW
Alleged
the former outlet
from water fall
spray curtain.
South side of
Building
Area is gravel
covered.

(87)

and Dirt. outlet
from above Building
Foundation is a
PVC pipe.

Area to south
is wood storage.
and South Ash Pile.

4/8/91

(38)

Blank

4/8/91

(39)

1050 Photo 1-8, 1-9

Looking South East and southwest at South Ashpile

piles are approx 5' high over an area about 200' Long 100' wide.

Runoff goes to South. Flows west through pasture then small creek about 100 yards to west.

4/8/91

1050 Photo 1-8, 1-9
Looking South East
and South West
at South Ashpile

Piles are approx
5' high over
an area about
300' long 100' wide.

Blank 4/8/91

Run off goes
to South. Flows
West through pasture
then small creek
about 100 yards
to west.

1055 Looking
South East at the
"Quench Tank"
for the waterfall
Spray Booth

At right in photo
is the bottom part.
of sprayor where
laquer is collected
the recycled.

Drum in Foreground.
is product Laquer
Thinner.

DMW
~~Blank~~ 4/8/91

(92)

Photo 1-10
055 Looking
South at the
"Quench Tank"
for the water fall
Spray Booth

Blank 4/8/91

At right in photo
is the bottom part.
of sprayer where
laquer is collected
the recycled.
Drum in foreground.
is product laquer
thinner.

(93)

units are both on
a concrete Floor.
Concrete Block walls
as containment.

Inside on South
wall of Build
Q Tank is approx
4 feet Square
3' high on
Steel legs.

Drains through
Pipe to outside.

4/8/91

walls are both on
the concrete floor.
Concrete block walls
are containment.

Image on South
wall of Building
Tank is approx
4 feet square
3' high on
steel legs.
Drain through
pipe to outside.

Photo P-11 South
at Nordson
Spray chamber
with recirculation
system.

4/8/91

(96)

Photo 1-11 South
at Nordson
spray chamber
with recirculation
system.

Blank
4/8/91

(97)

on west side of
property Scrap steel
Storage and
Cut wood
Storage. Stream
is about 100 yards
beyond.

1110 photo 1-12
Looking south
west at
Scrap Steel Storage
Area. This
material and cut up
and sold for scrap.

4/8/91

stream is at trees
in BKg.

1115 Photo 1-13

Looking NW
at west ash
piles. just
north of scrap steel
piles are larger
Approx 8' high
100 yards square
Area in Foreground
is also ash
disposal. 4/8/91

Blank 4/8/91

white material is
Gypsum board
and some brick.

1116 Photo 1-14
Looking west
at the Alleged
Solvent Burn
Pit.
Approx 25' Long
10' wide and
3 ft deep.

4/8/91

(102)

white Material is
Gypsum board
and some brick

16 Photo 1-14
Blank 4/8/91
Looking west
at the Alleged
Solvent Burn
Pit.
Approx 25' long
10' wide and
3 ft deep.

(103)

Area is at west end
of west Ash pile.
weeds and grass
grows in unit.
Ground Hog hole
in the center
Area is Surrounded
by mounds of
Ash + Debris
No runoff
to creek

Ash piles do runoff
to creek.

4/8/91

1125 Photo 1-15
Looking East
at the Location
of the Former
underground
storage Tank
Fills Nozzles are on concrete
No evidence of
staining
This tank was
Filled with grout.

4/8/91

1127 Photo 1-16
Looking east at
the location of
Former underground
Fuel oil storage
tanks
Tanks were beneath
gravel area
was concrete
Topped
No evidence of
staining.

4/8/91

(106)

Photo 1-15
Looking East
at the location
of the former
underground
storage tanks
fills were on concrete
No evidence of
staining

Blank 4/8/91

This tank was
filled with gravel.

Blank

4/8/91

School is about North 1/4 mile from Boundary.

1135 Photo 1-17 Looking East at the Greenwood operations Baghouse on top of Building Drops out to Bin.

4/8/91

(110)

School is about
North
1 mile from
Boundary.

Blank

4/8/91

135 Photo 1-17
Looking East
at the Greenwood
operations Baghouse
on top of Building
Drops out to
Bin.

(111)

The other baghouse
drops out to blue
pipes in photo
then to silo.

The blue/purple
silo to Left is
the old silo no
longer in use
It has the
dust collection
system on Top.
All Disconnected

4/8/91

(112)

The other baghouse drops out to blue pipes in photo then to silo.

The blue/purple silo to left is the old silo no longer in use. It has the dust collection system on top. All disconnected.

Blank 4/8/91

(113)

1038 Photo 1-18

Looking Southwest at the wood parts Manufacturs.

Baghouse on top of roof.

Drops out to Blue pipes to storage silos

4/8/91

(1/4)

1038 Photo 1-18

Looking Southwest at the wood parts Manufacturers. Baghouse on top of roof.

4/8/91

Blank Drops out to Blue pipes to storage silos

1040 4/8/91 (1/5)

Photo 1-19

Looking North at Dropout for the Greenwood operations Baghouse

Drops to Screw conveyor beneath concrete.

About 20' below ground then feeds through pipes to silos

Some in concrete trench.

(116)

1040

Photo 1-19

Looking North
at Dropout for
the Greenwood
operations Baghouse
Drops to Screw
Conveyor Beneath
Concrete.
About 20' below
ground then
feeds through
pipes to silos
some in concrete
trench.

Blank 4/8/91

(117)

1045 Photo 1-20
Looking Southwest
at Former Hopper
for Ash for
Boiler #s 1 and 2

Approx 3' wide
4' long and 5' high
over concrete.

Cyclone is
above an it.

4/8/91

(118)

1045 Photo 1-20
Looking Southwest
at Former Hopper
for Ash for
Boiler #s 1 and 2
Approx 3' wide
4' long and 5' high
over concrete.

Blank 4/8/91

cyclone is
above a pit.

Photo 1-21

(119)

1147 Looking East
at the
underground
8000 gallon
Fuel oil Storage
Tank
Concrete Pad
above.

4/8/91

(120)

Photo 1-21

~~11 47 Looking East~~

at the

underground

Boo pallet

Fuel oil storage

Blank

Tank

4/8/91

Concrete pad

above.

4/8/91 (21)

11 49 Photo 1-22

Looking south of the locations of Former Furnace/Boiler 1 and 2.

1 was above grade in Foreground

2 was below grade beneath grate.

All on Concrete Air Handling units in place but not visable in picture

1153 Photo 1-23, 1-24
Looking South East
at the concrete
waste wood
Storage silos
on Gravel No
signs of Leaks
or

Blue hopper in
front was used
to load chips
into a semi-trailer
to be sold to
Farmers not used
for 10 years

1149 Photo 1-22
Looking South at
the locations of
Former Furnace/Boiler
1 and 2.
Blank 4/8/91
1 was above grade
in foreground
2 was below grade
beneath grate.
All on concrete
Air Handling units
in place but
not visable in picture

(124)

Blank 4/8/91

4/8/91 (125)

1200 photo 1-25

Looking west at current solvent accumulation Area

Steel side shed.

Steel pan containment on wood blocks.

Single 55 Gal Drum.

Second drum in background is empty.

(126)

1200 Photo 1-25
Looking west at
current solvent
accumulation Area
Steel side shed.
Blank 4/8/91
Steel pan containing
on wood blocks.
Single 55 Gal Drum.
Second drum in
background is
empty.

4/8/91 (127)

1202 photo 1-26
Looking North
at the Alleged
waste
Solvent disposal
area.
Area is gravel
covered. Approx
20' Square.
1205 Finish Tour
and Head Back
to office for lunch.

(128)

Blank 4/8/91

4/8/91 (1.9)

1208 - Call State and Get information on metals analysis for wood Ash.

Information of wells.

2 wells.

used only for Supply of onsite Needs

(1:30)

Blank 4/8/91

4/8/91 (34)

VOC's Tested quarterly.
They will give us the results when they find them.

County has information on wells and completion of wells.

1230 Left site for Lunch

1330 Arrive
Back at
Site for
Final wrapup.

John Gartland
will get information
to me by
Early next
week

1400 Left Site.
for Bay

(134)

1330 [illegible]
Back at
Site for
final wrap up.

John Gartland
will get information
to me by
Early next
week

1400 Left Site.
for Day

4/8/91 (5)

David M.
Walker
4/8/91

Hoge Lumber -

John - Attorney -
Goal will be submitting
clean closure

Boiler 1 & 2
Boiler #1 - start 1941
→ not sure last 35 years had
air unit. Not in use in 5
years - used as stand-by =
= Belvies Prat in in early 50's
Boiler #2 - 1963 - started
removed from service
Bule - multi - cone place in
1963 - Approximately 5 years

Feed system removed - Boiler #1
furance removed - in other -
Boiler #2 furance & feedunit removed

Furance scraped -
tubes - moved - 5 years ago
burn un-treated wood.
Some dyed product

Boiler # 2, see up #
2 oil removed in 1965
(could not afore to) supplement
2.

→ Dropped into ~~drum~~ Hopper
placed back into yard -
waste piled in yard -
(for most likely # 12 sumu)

→ Bottom Ash - not much
no provision for removing
ash.
removed with wheel barrel
after closure and ash was
placed on pile.

Boiler #3. - with Blenvers - 55 mm.
place in service - 1985
not operated at 45 lbs/hr.
two drop out boxes
two under optimized; 2 under
drenching - after two stage
3 - serepate places but
drop out in same place

burns only raw wood
still in operation 5 days
a week.

=

Green Wood →
Baghouse drop into screw
with feed into screw drop.
- Baghouse - about 8 years
above 8.
collect - prior dust collector
about building - put into
silo which served ~~out~~ old
system.
this system has been removed
Baghouse still in operation.

Make lots of back for
brushs -
Steel tank below water

= Wood parts, has baghouse
37/6 - Lattice. -
Older ≅ 1980 start
untreated wood, drips into

another system but ends
up as fuel. into boilers.

#8 SUMU

Were spray booth letter form
⇒
Steel tank;
overspray is reused.
water tank used to re-used
water at spray booth.
1970's;
high solids, dust air less
system =
- MSDS - sheet requested -
=
2 solid waste ~~fa~~ water fall unit -
and re-cycled ~~b~~
- maintain back into system
when =
~~so~~
= didn't do wood finishing
into until 1970's,

~~A~~ Sumu

= See location of former discharge analysis of wastewater -

= Back into same are solvents for clean guns etc are re-cycled via the drop out system?

~~Fin~~ Finishing Room (new sumu's)
order - wood cabinets
clean of equipment where solvent - now solvent are collected taken off site
shipped to T.S.D.F. -
3 months - four months -
manifest -
- drum - point of generator.
= Sumu - ~~storage area~~,
cabinets -
may be stained -
wood floor -
=

Sumu #9

wood silo -
Blue - not in use -

3 other in use for stores
of fuel
Two used all the time
3 used for over flow -
= capacity -

14" by 34" - Steel
the 3 are 24' by 60 -
other 3 are concrete -
concrete pad under -
material feed top.

Steel
1957 started stopped
1984.

Concrete - storage area, 1970's lake
one 1982 ; 1986 -
always burned -

Continuer ~~[illegible]~~ Sumu

Ash Pile
West wood Ash pile -
off-grate that dump so
not fly ash -
When fly ash is removed goes
in to same system.
1914 - moved
Facility
~~[illegible]~~ used as base for
roadways - fire land -
Roadways -
Chemical Analysis not
available - Hoge Lumber
has not analyzed it -
not analysis - no organic
not

→ Ash for roadway or storea –

chipper – into SILO's –

= Solvent burn area
– short period of ~~tim~~ time

has been dug up & incinerator

remediation 64 drum –
toluene + xylene found in

=

= AOC-B – Alleged Area –
waste solvent disposed onto
the ground –

AOC-A –
~~Stro~~ Storm
Ash storage area – run-off

M Big – several hundred yds –

- NPDES - none -

Boiler - Blow-down -
goes into creek -
from cooling water tower
thinking about discharge
~~the~~ POTW.

- Cooling tower - Algaecides -
involved area - prior to
lumber company -

plot plan -

---

underground tank -
two tanks -

ONE used as fuel source
for boiler - #2 fuel oil
boiler #4.

slurry - was under disposal
Nov. 1984. before de

local fire chief –
two were removed –

fuel oil –

two – removed → is not
inspected by fire chief –
two removed 500 gallon –

6,000 gallons – slurry
filled

operational out – ~~200~~
1965 –

8,000 gallon tank –

under concrete –

photo log

B 13 Building furance & screw conveyors.

003 - boiler

Concrete pad -

Photo #1-1-

Boiler #3 furance

Photo #2

Screw conveyed.

Photo 1-3 Breslow

two Stag - boiler

look south -

size 10' by 4 feet

metal construction

with heat covering

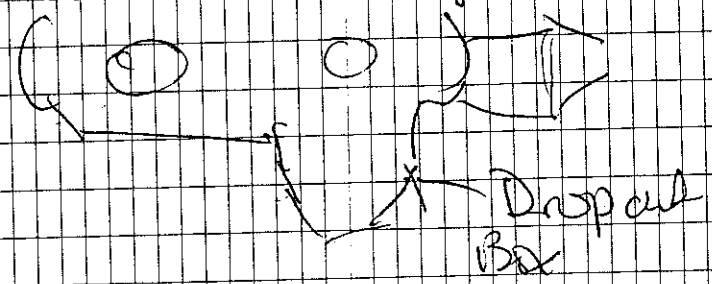


Photo 1-4

Drop out Breacher - Double

metal construction with lead covers

3 feet at top drops to 1 foot approximately

Photo 1-5

cooling H_2O tower corrugated metal

water storage area is approximate 40 x 120 4 feet deep with 1 foot orifice.

tower is approximately 40 feet 70 feet make up H_2O used.

wells
ground water
#10 limestone
- drinking H_2O -

photo 1-6 ~~Active~~ 23 area
NW
Ash drop off from boiler #3
~~Concrete~~ concrete containment
area approximately
8 x 30 feet -
Sloped to pile
Storm water evaporates -
pile was only ~~2 feet~~ 1½ feet
high and approximately
3 feet wide.
Collected approximately
one a week

---

photo 1-7 (NW)
look north west
former water spray booth
area - unit are not left nor
operational
waste drums are filled
in this area from pipe.

---

photo 1-8 (SE)
Several piles approximal
3 feet high

Lacquer Thinner
Paint UN 1263

one or two day
a week

Ash pile run-off to
(SW) to creek -
1-9 (SW)

1-10 (N) in Build
Quench tank
approximately 3 feet high
3 feet x 3 feet - constructed
of steel and covered with
wood. unit is bolted to
floor. Recyces water
from spray unit.

also area were drums
of product one stored.

1-11 (N) Norson Spray chamber
sprays lacquer thinner

west area 1-12 (B) (SW)
scrap yard
various metals including
scrap drums, Stacks -
pipeing

1-13 (
Western Ash ~~Pp~~ Pile
Several piles approximate
10 feet high
White stuff is well bound
~~B~~ Bricks - file
Solvent burn area
100 yds x 100 yds

1-14 (W)
Solvent burn pit
12 feet long two feet
wide & foot below grade

1-15 (?)
Under ground tank filled
with slurry removed
from service. ~~B~~

1-16 (~~AS~~
the two 500 gallon
tanks removed from service
Counted underground
~~Black top~~ ? Concrete

1-17
Green wood baghouse
on top of build 6
Baghouse to STEC 1

Blue silo - ~~not~~ next to baghouse
approximately 60 feet x 20 feet

1-18 - Baghouse (SW)
on top of roof Building 1¢
note piping that flow from
baghouse to baghouse
to silo's -

1-19 (S) drop out box under
building from Green house
Baghouse
Chippee, ~~silo~~, underground pipe
system piping system to silo
flogger sys

Scrap steel
beside building

1-20(w)
Old hopper & collection system
for ash from boiler 1 & 2
not operational

1-21(E)
Heating oil tank, full
area 8,000 gallon below
storage tank
T.B. on

1-22
Boiler 1 and 2 units various unit
removed for both
Boiler 1 of above + photo
furnace in photo.

1-23( )
photo of concrete
silo which store wood fuel

1-24( )
silo's.

1-25( )
Waste solvent storage
area.
Hazardous Wast
F0037
lacquer thinner
~~Bq~~ toluene / xylene
flammable

1-26( )
Area were solvent (lacquer
thinner was damper.

JKD

Scrap steel
behind building

1-20(ii)
Old hopper & collection system
for ash from boiler 1 & 2
not operational

1-21(i)
heating oil tank, fuel
area 8,000 gallon boiler
storage tank
[illegible]

1-22
Boiler 1 and 2 units various unit
removed for both
Boiler 1 closed + photo
furnace in photo.

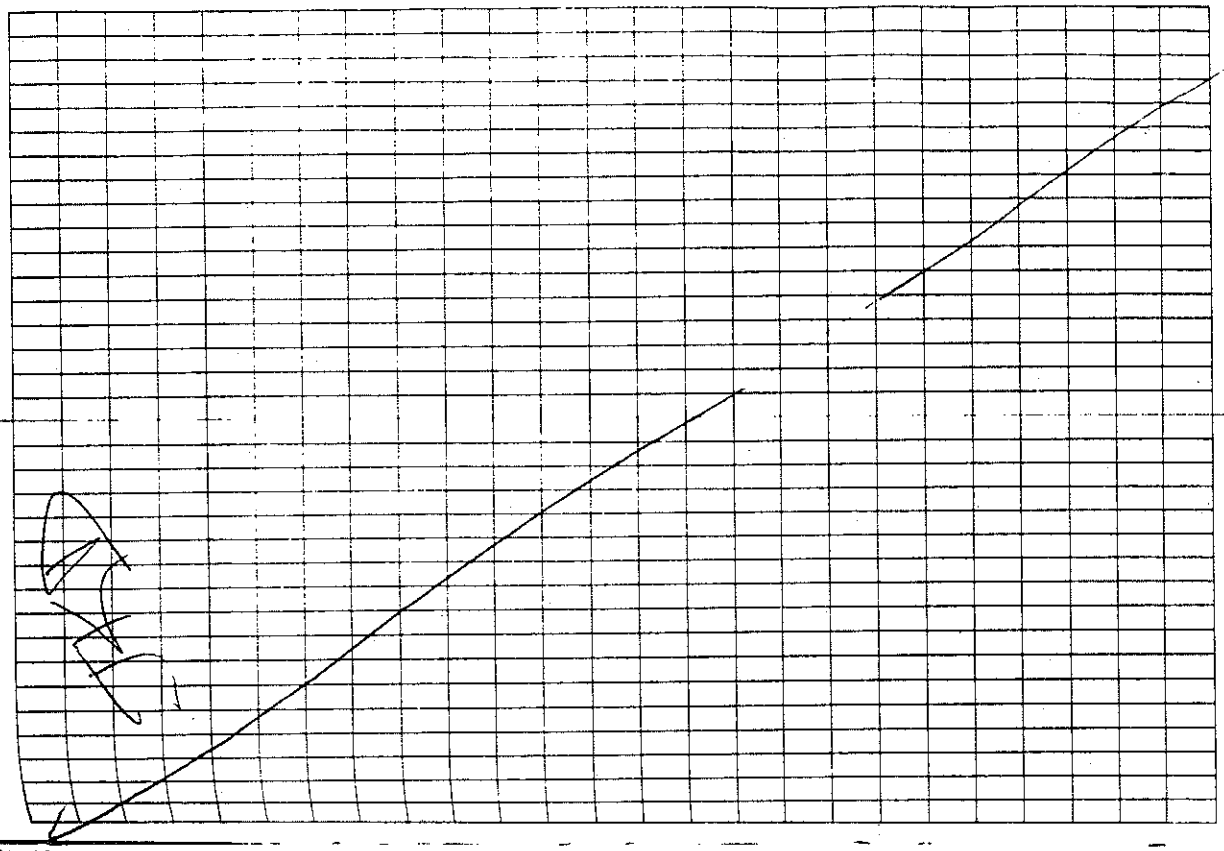
1-23( )
photo of concrete
silo which store wood fuel

1-24( )
silo's.

1-25( )
waste solvent storage
area
Hazardous Wast
F0037
liquer thinner
~~Sq~~ toluene / xylene
flammable

1-26( )
Area were solvent (lanquer
thinner was dumped.

JKD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

5HR-13

REPLY TO ATTENTION OF:

Mr. Clark Froning
Hoge Lumber Company
P.O. Box 159
New Knoxville, Ohio 45871

Re: Visual Site Inspection (VSI)
Hoge Lumber Company
New Knoxville, Ohio
OHD005045729

Dear Mr. Froning:

The United States Environmental Protection Agency (U.S. EPA) Region V has requested A.T. Kearney, Inc., U.S. EPA's RCRA Implementation Contractor, to conduct a RCRA Facility Assessment (RFA) at the Hoge Lumber Company facility. Under the 1984 Hazardous and Solid Waste Amendments (HSWA), a RCRA Facility Assessment is required of Hoge Lumber Company. The assessment requires identification and systematic review of all solid waste streams at the facility. The objective of this assessment is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the site which require further investigation. This analysis will provide information to establish priorities for subsequent remedial investigations.

An integral part of this assessment is a visual site inspection (VSI) of your facility to verify the location of all "solid waste management units" (SWMUs) and to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site visit, no samples will be taken.

Printed on Recycled Paper

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. This site visit is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of each SWMU are to be taken to document the condition of each unit at the facility and the waste management procedures used.

The VSI has been scheduled for April 8, 1991. The A.T. Kearney inspection personnel will be accompanied by an Ohio EPA representative. Your cooperation in admitting and assisting them while on site is appreciated.

In preparation for the VSI, the inspection personnel are required to identify any potentially hazardous conditions likely to be encountered at the site during performance of the VSI and to prepare a safety plan that deals with the hazards, if necessary. You will be contacted by an A.T. Kearney Health and Safety Officer by telephone in the near future to obtain specific information on the level(s) of personal protection required and materials handled in each area of your facility.

A copy of the proposed VSI agenda (Attachment I) is enclosed. Please review and gather the information requested in Attachment II, the information needs list, prior to the VSI. Should you have questions regarding this letter, please contact Ms. Donna Twickler of my staff at (312) 886-6184 or Mr. Jim Carloss of A.T. Kearney at (303) 572-6175. A copy of the PR/VSI report when completed, excluding Section IV (Conclusions and Suggested Further Actions), may be requested by contacting Donna Twickler.

Sincerely,

Lisa A. Pierard, Chief
Ohio Permitting Branch

Enclosure

cc: E. Lim, OEPA
T. Toorkey, OEPA

bcc: B. Orenstein, EPA Region V
D. Twickler, RPB/OH
A. Anderson, A.T. Kearney
J. Carloss, A.T. Kearney

ATTACHMENT I

RCRA FACILITY ASSESSMENT
VISUAL SITE INSPECTION AGENDA

FACILITY:	Hoge Lumber Company 800 South Main Street New Knoxville, Ohio 45871
EPA I.D. No:	OHD005045729
FACILITY CONTACT:	Clark Froning
DATE OF INSPECTION:	April 8, 1991
PERSONNEL:	June Dreith, A.T. Kearney, Inc. Dave Walker, A.T. Kearney, Inc. Kevin Wander, Ohio EPA

PURPOSE OF INSPECTION:

The Hazardous and Solid Waste Amendments of 1984 (HSWA) broaden the Scope of the Environmental Protection Agency's (EPA's) authority under the Resource Conservation and Recovery Act (RCRA) by requiring corrective action for releases of hazardous wastes and constituents at facilities that manage hazardous wastes. The RCRA Facility Assessment (RFA) is conducted to evaluate the potential for releases to the environment and the need for corrective action.

The RFA includes a desk-top preliminary review (PR) of available file information, a visual site inspection (VSI) of the facility and, if necessary, a sampling visit. Based on the review of available data for this facility, a visual site inspection (VSI) has been determined to be necessary. The purpose of the VSI is to:

1. Survey the site for hydrologic, geologic, and surficial features.

2. Identify solid waste management units (SWMUs) and other areas of concern, documenting and photographing all SWMUs and other areas of concern.

3. Review site information with facility representatives.

Hoge Lumber Company
800 South Main Street
New Knoxville, Ohio 45871
Visual Site Inspection
April 8, 1991

INSPECTION ORGANIZATION

A.T. Kearney personnel will form a two-member team to perform a one-day inspection tour. The team, in general, will inspect waste generation and disposal areas such as container storage areas, surface impoundments, waste piles and release pathways for release of wastes into the environment. An interview with the facility staff will be performed to develop a better understanding of past waste disposal practices. Pertinent geologic information consisting of well logs, USGS topographic maps, plat and zoning maps and surrounding land use patterns will be reviewed. The team will concentrate on developing a better understanding of the vertical and horizontal alignments of any waste piles, container storage areas, and any other waste generation, treatment, storage and disposal facilities. A review of the regional hydrogeology and site-specific data will be performed to make an assessment of depth to groundwater and its flow direction in the proximity of the Solid Waste Management Units.

The overall rationale of this inspection plan is to enable the team to trace waste streams from generation at the facility through disposal. Some adjustments to the agenda will more than likely be necessary to accommodate facility staff, geographical location of units and/or operational constraints.

Preliminary information needs have been submitted as Attachment II to aid Hoge Lumber Company in preparing for the site visit. These issues will be resolved in an introductory meeting during the VSI. A more efficient agenda may be arranged at that time to ensure that all SWMUs identified will be inspected.

Hoge Lumber Company
800 South Main Street
New Knoxville, Ohio 45871
Visual Site Inspection
April 8, 1991

PROPOSED INSPECTION SCHEDULE

April 8, 1991: 8:30 a.m. - 4:30 p.m. (0830 - 1630)

INTRODUCTORY MEETING

Inspection Team will meet with Hoge Lumber personnel to discuss:

- Purpose of visit;
- Agenda;
- Health and safety considerations;
- Facility history and operations; and,
- Additional information needs pertaining to the SWMUs identified during the PR.

INSPECTION TOUR OF POTENTIAL SWMUs

The inspection tour will consist of a visual inspection of the identified SWMUs. Photographs of these units and areas will be taken. The inspection tour schedule will be discussed and agreed upon during the introductory meeting and discussions.

The following is a list of potential SWMUs identified during the file review. These and all other SWMUs and areas of concern identified while at the site will be inspected.

Hoge Lumber Company
800 South Main Street
New Knoxville, Ohio 45871
Visual Site Inspection
April 8, 1991

Potential SWMUs

1. Boiler No. 1 Cyclone
2. Boiler No. 1 Fly Ash Bin
3. Boiler No. 2 Multiple Cyclone
4. Boiler No. 2 Fly Ash Bin
5. 55mm Bru/Hr Boiler 2 Stage Breslove Collector
6. Green Wood Operations Baghouse
7. Wood Parts Manufacturing Dust Collection System
8. Spray Booth Waterfall Collection System
9. Wood Refuse Silos
10. Solvent Waste Burn Area
11. Container Storage and Accumulation Area
12. West Ash Pile
13. South Ash Pile
14. Miscellaneous Waste Storage Areas

Potential AOCs

AOC A Storm Sewer System
AOC B Potential Waste Solvent Disposal Area

WRAP-UP MEETING

Inspection Team will meet with Hoge Lumber Company personnel to conclude the day's activities.

Hoge Lumber Company
800 South Main Street
New Knoxville, Ohio 45871
Visual Site Inspection
April 8, 1991

ATTACHMENT II

PRELIMINARY INFORMATION NEEDS FOR
RCRA FACILITY ASSESSMENT

1. Identify past or present SWMUs which have not been previously identified in the VSI Agenda. Include a brief description of wastes managed in these units and the period of operation. Units to identify include, but are not limited to, the following:

   - Above ground and underground waste storage tanks.
   - Abandoned waste storage tanks.
   - Waste storage units for solid and hazardous wastes which fall under the 90-day exemption from RCRA.
   - All waste handling areas and associated activities including loading zones, transfer areas, and waste accumulations areas.

2. Provide the start-up date of the facility and describe any processes and/or disposal changes which have occurred.

3. Submit information relative to the history of the facility prior to its use by Hoge Lumber Company, including former owners, site uses, and existing buildings and/or structures.

4. Provide facility maps including all historical topographic maps and aerial photographs, which identify the locations of all operations and the SWMUs listed in the VSI Agenda.

Hoge Lumber Company
800 South Main Street
New Knoxville, Ohio 45871
Visual Site Inspection
April 8, 1991

ATTACHMENT II

PRELIMINARY INFORMATION NEEDS FOR
RCRA FACILITY ASSESSMENT
(cont'd)

5. Provide the following information for all underground storage tanks (if any):

- Description of any releases
- Age of tank
- Location of tank
- Materials of construction
- Date of installation
- Date of removal or discontinuation of use, if applicable

A.T. Kearney, Inc.
One Tabor Center, Suite 950
1200 Seventeenth Street
Denver, Colorado 80202
303 572 6175
Facsimile 303 572 6181

Management
Consultants

RECEIVED
MAR 21 1991
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

AT KEARNEY

March 20, 1991

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R05-14-14; Hoge Lumber, New Knoxville, Ohio; EPA I.D. No. OHD005045729; Visual Site Inspection Notification Deliverable

Dear Mr. Orenstein:

Enclosed please find the Visual Site Inspection (VSI) Notification Letter and proposed Agenda and Information Needs List for the above-referenced facility. The VSI is scheduled for April 8, 1991.

Should you have any questions or require additional information, please feel free to contact me.

Sincerely,

James C. Carloss

James C. Carloss
Kearney Work Assignment Manager

Enclosure

cc: D. Twickler, USEPA Region V
A. Anderson
J. Dreith
D. Walker
A. Glazer
L. Poe
A. Williams (w/o enc)

A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, Illinois 60606
312 648 0111
Facsimile 312 648 1939-2302

Management
Consultants

RECEIVED
MAR 11 1991
OFFICE OF RCRA
Waste Management Division
U.S. EPA REGION V

AT KEARNEY

March 8, 1991

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R05-14-14; Hoge Lumber; New Knoxville, Ohio; EPA I.D. No. OHD005045729; Preliminary Review/Visual Site Inspection; Work Plan

Dear Mr. Orenstein:

Enclosed please find the proposed work plan which you requested for the above-referenced work assignment. This work plan calls for the Kearney Team to conduct a Preliminary Review/Visual Site Inspection (PR/VSI) at the Hoge Lumber facility.

All applicable A.T. Kearney conflict of interest avoidance procedures have been adhered to for the proposed firms and staffs.

Also enclosed is a work plan approval sheet which you should sign and return to Allen Pearce. In accordance with the procedures for this contract, if the Contracting Officer has not provided written approval of this work plan by April 5, 1991 A.T. Kearney will stop work on this project. In these cases, A.T. Kearney will not resume work until the Contracting Officer approves the work plan.

In order to determine the need for a site health and safety plan, or to prepare such a plan, the Kearney Team may need to obtain additional information from EPA or the facility personnel regarding the potential hazards at this site. If information is not provided to the level of detail required to properly assess potential hazards, A.T. Kearney reserves the right to delay proceeding with the site visit until the information is provided.

In cases where the Kearney Team must delay a site visit due to circumstances outside the Team's control, A.T. Kearney will accommodate the schedule change to the maximum extent possible. However, A.T. Kearney reserves the right to charge EPA for expenses incurred as a direct result of the delay. Any such expenses will be brought to EPA's attention as quickly as possible and will be properly documented.

Please feel free to call me or James Carloss, the Kearney Team Work Assignment Manager (who can be reached at 303/572-6175), if you have any questions.

Sincerely,

Ann L. Anderson

Ann L. Anderson
Technical Director

cc: A. Pearce, EPA OSW
C. Chase, EPA Contracts
D. Twickler, EPA Region V
A. Glazer
L. Poe
J. Carloss
J. Dreith
D. Walker
M. Yancey
M. Lane
P. Williams
A. Williams
M. Ritter
L. Maher
B. Boomer, MRI

PROPOSED WORK PLAN

HOGE LUMBER
NEW KNOXVILLE, OHIO
PRELIMINARY REVIEW/VISUAL SITE INPSECTION
EPA I.D. NO. OHD005045729

Submitted by:

A.T. Kearney, Inc.
222 S. Riverside Plaza
Chicago, Il 60606

Submitted to:

Mr. Bernie Orenstein
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

In response to:

EPA Contract No. 68-W9-0040
Work Assignment No. R05-14-14

March 8, 1991

Regional Work Plan Approval

I have reviewed the attached work plan and find it meets our criteria for technical accuracy and properly reflects the scope of work and intended use of the deliverable(s), as described in the work assignment. The projected cost, staff hour estimates, and labor mix are also acceptable.

APPROVAL:

_____ _____
EPA Regional Project Officer Date

APPROVAL:

_____ _____
EPA Headquarters Project Officer Date

APPROVAL:

_____ _____
EPA Contracting Officer Date

CONCURRENCE:

_____ _____
A.T. Kearney Program Director Date

HOGE LUMBER
NEW KNOXVILLE, OHIO
PRELIMINARY REVIEW/VISUAL SITE INSPECTION

WORK TO BE PERFORMED

The Kearney Team will conduct a Preliminary Review/Visual Sie Inspection of the Hoge Lumber facility, New Knoxville, Ohio (EPA I.D. No. OHD005045729), which includes performing a file search of State of Ohio EPA files, conducting a Preliminary Review (PR) and Visual Site Inspection (VSI), and preparing a PR/VSI report evaluating the potential for release from each Solid Waste Management Unit (SWMU) and Area of Concern (AOC) identified during the PR/VSI. In addition, the Kearney Team will provide suggested further actions for each SWMU and AOC. Upon review of the file materials, there are estimated to be 10 SWMUs.

The Hoge Lumber facility is a lumber company which discharged F003 solvent waste from spray painting operations directly to the soil. In the past, these solvent wastes were burned in a waste pile directly on the ground. Upon review of the file material, there are estimated to be 12 SWMUs.

PRIMARY INTENDED USE

The purpose of this project is to assist EPA Region V in:

(1) Identifying and gathering information on releases at the facility;

(2) Evaluating solid waste management units (SWMUs) and other areas of concern (AOCs) for release potential to all media;

(3) Making preliminary determination regarding releases of concern and the need for further actions and interim measures at the facility; and

(4) Screening from further investigations, those SWMUs and other areas of concern that do not present a release potential.

The deliverable will be prepared in a format approved by EPA and suitable for use by EPA in the administrative record for the facility.

PROJECTS AND TASKS

The project will consist of the following tasks:

Task 01 - Prepare a work plan. This will include all preliminary contacts, including the EPA Work Assignment Manager (EPA WAM) and state representative, required for the preparation of the work plan, and file searches at the Ohio EPA and offices.

Files to be reviewed include RCRA, NPDES, CERCLA, and Air Quality, as well as any Solid Waste files and emergency response or spill notifications.

At the request of the EPA WAM, the Kearney Work Assignment Manager (KWAM) will contact the facility to schedule the Visual Site Inspection (VSI). The VSI has been scheduled for April 8, 1991 to allow the attendance of the EPA WAM, who will also inspect the Hardin County Landfill (Work Assignment No. R05-14-11) during the same trip to Ohio.

Task 02 - Conduct a Preliminary Review (PR) of the existing file material to identify the need for additional information, and to provide focus for activities to be conducted during the Visual Site Inspection (VSI) and (if necessary) the Sampling Visit (SV). This task includes the preparation of a VSI Notification Letter which includes a summary of information needs, and a proposed VSI agenda to be sent to the facility by EPA.

This task also includes identification of the safety hazards anticipated during the VSI; the completion of a Health and Safety Checklist; and the review of the Health and Safety requirements for the VSI by Kearney's Health and Safety Director.

Task 03 - Prepare for and conduct the VSI. A one-day visual site inspection is projected with associated travel time. Prior to the VSI, the Kearney Team will discuss the agenda and goals of the VSI with the EPA WAM. The objectives of the VSI will include the following:

- Verify the information collected during the PR, including the location and condition of the SWMUs and AOCs;
- Identify any additional SWMUs and AOCs;

- Verify and obtain factual information to characterize properly all SWMUs and AOCs. Perform visual inspection and document field observations with photographs and field logs.

- Review site information with the facility representative and collect additional information to determine the need for further actions.

- Identify possible future sampling locations as appropriate; however, development of a sampling plan and performance of a sampling visit are not included within the scope of this work assignment.

This task includes preparation of the field equipment to be used during the VSI.

Task 04 - Prepare a PR/VSI report according to the format presented in Region V RFA - Related Scope of Work for Contract No. 68-W9-0040. In cases where information on SWMUs or AOCs can be combined, tables will be developed instead of individual SWMU or AOC summaries. In addition, a brief cover letter will accompany the PR/VSI Report, highlighting major findings.

Task 98 - Perform a quality control review of the draft deliverables.

Task 99 - Provide management oversight for the project.

HEALTH AND SAFETY PLAN

In preparing for the site visit, the Kearney Team will complete a site-specific checklist to identify the activities and potential hazards at the site. Information to complete the checklist will be obtained from the Regional Project Officer, EPA WAM, and/or other EPA staff who are knowledgeable about the site, and from the facility contact.

After the checklist has been completed, a determination will be made by the A.T. Kearney Health and Safety Director regarding the need for a health and safety plan for the site visit based on

the anticipated hazards at the site. In cases where a health and safety plan is required, the Kearney Team will develop a specific plan for the site and amend the work plan to include an additional task to provide for resources for plan development. In cases where no health and safety plan is required (i.e., minimal hazard potential), the Kearney Team will follow health and safety procedures as outlined in the Kearney Staff Protocol for site visits.

MONTHLY PROGRESS REPORT

Information regarding the status of this project will be included in the monthly progress reports A.T. Kearney, Inc. provides to EPA. The information will address:

- Work completed to date,
- Difficulties encountered and remedial action taken,
- Anticipated activity during the subsequent reporting period, and;
- Sufficiency of authorized dollars and hours to complete the project.

QUALITY CONTROL PLAN

The Kearney Team Work Assignment Manager (KWAM) will conduct milestone checks on each task. In addition, draft project deliverables will be reviewed by a senior technical staff member) of Midwest Research Institute to ensure quality and consistency with EPA regulations and policy.

STAFFING AND MANAGEMENT

James Carloss of A.T. Kearney will serve as the Kearney Team Work Assignment Manager (WAM).

Individual staff responsibilities are shown in Attachment I. The proposed staffing and task assignments for the project are shown in Attachment II. Hour allocations are shown for each task.

All applicable conflict of interest (COI) avoidance procedures have been adhered to for the proposed firms and staffs.

PERFORMANCE SCHEDULE

The project will be conducted according to the schedule shown in Attachment III.

COST ESTIMATE

The estimated cost for completing this project is included as Attachment IV.

BASIS FOR PERFORMANCE EVALUATION

The measures for evaluation of work assignment performance are described for each of the following performance criteria: technical quality; compliance with schedule; compliance with budget; management; and editorial quality. Measures for each of these criteria are discussed and agreed upon by the RPO and the Kearney Team WAM during the assignment planning process. To the extent possible, clear, quantitative measures will be established.

ATTACHMENT I

STAFF RESPONSIBILITY CHART

STAFF	ROLE	AREAS OF RESPONSIBILITY
A. Anderson	Technical Director/ Regional Liaison	Management oversight; Initiate work, monitor project planning and implementation, and conduct project performance evaluation
A. Williams	Technical Assistant	Administrative support, to the Technical Director such as: perform COI checks, assemble and edit work plans, project tracking, general completeness review of deliverables, and distribute documents
J. Carloss	Kearney Team Work Assignment Manager	Day-to-day management
J. Dreith	Technical Staff	PR; VSI Team Leader; PR/VSI Report
D. Walker	Technical Staff	PR; VSI Team Member; PR/VSI Report
M. Yancey	Technical Staff	Preliminary Review; PR/VSI Report
M. Lane	Technical Staff	File review at OEPA
P. Williams	Health & Safety Director	Health and Safety Checklist Review
G. Kline	Quality Control Reviewer	Senior-level technical review of final deliverable

EPA Contract No. 68-W9-0040
Work Assignment No. R05-14-14
Hoge Lumber
New Knoxville, Ohio
PR/VSI Report
EPA I.D. No. OHD005045729

Work Plan Revision No. 0
March 8, 1991

ATTACHMENT II

STAFFING

STAFF			TASK						
Name	Firm 1/	Labor Category 2/	01	02	03	04	98 3/	99 4/	TOTAL
Technical Director									
A. Anderson	ATK	P4	4	-	-	-	-	12	16
Work Assignment Manager									
J. Carloss	ATK	P4	8	-	-	-	-	8	16
Staffing									
J. Dreith	ATK	P4	-	12	12	32	-	-	56
M. Lane	K/C	P3	12	-	-	-	-	-	12
D. Walker	ATK	P3	-	12	12	40	-	-	64
M. Yancey	ATK	P1	-	16	-	12	-	-	28
A. Anderson	ATK	P4	2	-	-	-	-	3	5
A. Williams	ATK	T2	8	-	-	-	-	10	18
Tech. Support	ATK		5	2	-	30	-	5	42
P. Williams	K/C	P4	-	2	-	-	-	-	2
Quality Control									
G. Kline		P4	-	-	-	-	8	-	8
Tech. Support			-	-	-	-	2	-	2
TOTALS			39	44	24	114	10	38	269

1/ ATK = A.T. Kearney, Inc.
K/C = Kearney/Centaur, a Division of A.T. Kearney, Inc.
MRI = Midwest Research Institute
2/ Provides Labor Classification for Each Staff Person (e.g., P4, P3)
3/ Task 98 = Quality Control
4/ Task 99 = Project Management

ATTACHMENT III

SCHEDULE

Task	Milestone #	Description	Scheduled Date
01	01	Prepare work plan	03/08/91
02	02	Submit VSI notification letter to EPA	03/14/91
02	03	Submit health and safety checklist to Health and Safety Director for review	03/14/91
02	04	Health and Safety Director provides comments on health and safety check-list, determines whether a site-specific health and safety plan is needed	03/15/91
03	05	Conduct Visual Site Inspection	04/08/91*
03	06	Conduct conference call with EPA WAM regarding VSI and potential change in scope of work	04/17/91*
98	07	Submit draft PR/VSI Report to QC	05/08/91*
04	08	Submit QC comments to KWAM	05/15/91*
04	09	Submit PR/VSI report to TD	05/23/91*
04	10	Submit PR/VSI report to EPA	05/30/91*
99	11	Project management	In accordance with above milestones

* The option period extending the contract date beyond March 31, 1991 has not yet been exercised. This task is scheduled with the expectation that the option period will be exercised.

F.1 Imagery/Special Studies