TSD File Inventory Index

Date: September 25, 2001

Initial: C M Guerrero

Facility Name:	Cytec Industries, Inc. (PB Plant - One Folder Site)
Facility Identification Number:	OHD 005 044 128

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	X
A.2 Part A / Interim Status	X	.1 Correspondence	X
.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		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: Documents do not justify individual folder per schedule

A.2 Part A/
Interim Status

PA

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

RECEIVED MAR 17 1994
WMD RCRA
RECORD CENTER

George V. Voinovich
Governor

Donald R. Schregardus
Director

February 9, 1994

Cytec Industries Inc., PB Plant
Attn: John Demarco
P.O. Box 148
Perrysburg, OH 43552

RE: EPA ID#: *OHD005044128*

LOCATION of INSTALLATION: *12600 Eckel Rd*
Perrysburg, OH 43551

In response to your request of February 2, 1994 the following information has been updated:

Status: small quantity generator

Name: Cytec Industries Inc PB Plant
(formerly listed as American Cyanamid Co)

Contact phone: (419)872-1411

Owner: Cytec Industries Inc.

Added waste code: F002

Deleted waste codes: D002, D007, D008, F001, F003, U008, U031, U080, U147, U190, U220

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

Printed on recycled paper

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 3, 1993

RECEIVED MAR 8 1993
WMD RCRA
RECORD CENTER

Pub A

American Cyanamid
Attn: John G. DeMarco
P.O. Box 148
Perrysburg, OH 43551

RE: EPA ID#: *OHD005044128*

LOCATION of INSTALLATION: *12600 Eckel Road*
Perrysburg, OH 43551

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

Contact: John G. DeMarco

No longer listed as a TSD site.

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

Printed on recycled paper

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

JAN 08 1991

Mr. John G. DeMarco
American Cyanamid
P.O. Box #148
Perrysburg, OH 43551

RE: EPA ID #: OHD 005 044 128

In response to your request of December 10, 1990 the following information has been updated:

Contact Person: John G. DeMarco, Plant Manager

Hazardous Waste Description Code: F002

If you have questions, please contact Sharon Kiddon at (312) 886-6173.

Sincerely,

Bernie Orenstein
for Arthur S. Kawatachi
Information Management Section
RCRA Program Management Branch

cc: State Agency
File

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

MAY 14 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Arthur M. Gustafson
American Cyanamid Company
P.O. Box 148
Perrysburg, Ohio 43551

RE: Interim Status Acknowledgement USEPA ID No. OHD005044128
FACILITY NAME: American Cyanamid Company

Dear Mr. Gustafson:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

5/4/82

Enclosure
cc: E.E. Standring

CYANAMID

American Cyanamid Company
Industrial Chemicals Division
Wayne, NJ 07470

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 12, 1980

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Reference: American Cyanamid Company
Perrysburg, OH Plant
OHD005044128

Dear Sir:

Please find attached the Notification of Hazardous Waste Activity, EPA Form 8700-12, for American Cyanamid Company's Perrysburg, OH plant.

Please advise if any further information is required.

Very truly yours,

Richard B. Tabakin

Richard B. Tabakin
Coordinator
Environmental Science

RBT/jcm
Attachment

Information or assistance is provided for your consideration without any legal responsibility. Users are expected to perform adequate verification and testing to satisfy themselves that it suits their purposes.

CYANAMID

RECEIVED
DEC 13 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

U.S. EPA Region V
Ohio RCRA Activities
Waste Management Division
230 S. Dearborn Street
Chicago, Illinois 60604

December 10, 1990

Dear Sirs:

Enclosed is the "Notification of Hazardous Waste Activities" form for American Cyanamid's Perrysburg Plant.

This is a subsequent notification due to this facilities' closure of RCRA Part A status.

Very truly yours,

John G. DeMarco
Plant Manager

JGD:sa

cc: Joe Carfora - SO
John Clulow - PB
George Koehler - NA
(Rm. 312A W3)

C, A

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

Approved. OMB No. 2050-0028. Expires 10-30-91
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

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: C C

Installation's EPA ID Number: C F T/A C 1

Approved

Date Received (yr. mo. day)

I. Name of Installation

AMERICAN CYANAMID COMPANY

II. Installation Mailing Address

Street or P.O. Box: C 3 P O BOX 148

City or Town: C 4 PERRYSBURG

State: OH

ZIP Code: 43551

III. Location of Installation

Street or Route Number: C 5 12600 ECKEL RD.

City or Town: C 6 PERRYSBURG

State: OH

ZIP Code: 43551

IV. Installation Contact

Name and Title *(last, first, and job title)*: C 2 DeMARCO JOHN PT MGR

Phone Number *(area code and number)*: 419 874 7941

V. Ownership

A. Name of Installation's Legal Owner: C R AMERICAN CYANAMID CO

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
- [ ] 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
  - [ ] 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

DEC 14 1988
U.S. EPA REGION V
SWS — 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.

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

C. Installation's EPA ID Number: OHD005044128

1-15-91 cl

(C)

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.

(A)

1	2	3	4	5	6
F 0 0 2					
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 40 CFR Part 261.33 for each chemical substance your installation handles which may be 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 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
John G. DeMarco	John G. DeMarco Plant Manager	12/10/90

Estimated burden: Public reporting burden for this collection of information is estimated to be 3 hours, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

A

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → OHD005044128 REACKNOWLEDGEMENT

AMERICAN CYANAMID COMPANY
PO BOX 148
PERRYSBURG OH 43551

INSTALLATION ADDRESS → 12600 ECKEL ROAD
PERRYSBURG OH 43551

EPA Form 8700-12B (4-80) 09/29/81

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

Form Approved OMB No. 158-S79016
A No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	OHD005044128
I. NAME OF INSTALLATION	AMERICAN CYANAMID CO*
II. INSTALLATION MAILING ADDRESS	PO BOX 148 PERRYSBURG, OH 43551
III. LOCATION OF INSTALLATION	12600 ECKEL RD PERRYSBURG, OH 43551

000079 AUG 20 80

Duplicate

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F 31 — APPROVED: — DATE RECEIVED (yr., mo., & day): 80 08 18

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3

CITY OR TOWN: 4 — ST. — ZIP CODE

II. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5

CITY OR TOWN: 6 — ST. — ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 CADWELL LEONARD PLANT MANAGER

PHONE NO. *(area code & no.)*: 419-874-7941

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 AMERICAN CYANAMID COMPANY

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. 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 I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: OHD005044128

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

AUG 19 1980

- FOR OFFICIAL USE ONLY

1	2–13	T/A 14	C 15
W	OHD005044128	2	1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001					
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 industrial 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
U008	U031	U147	U190	P100	U080
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 listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [X] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [ ] 4. TOXIC (D000)

X. 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 & OFFICIAL TITLE *(type or print)*	DATE SIGNED
L. E. Calwell	PLANT MANAGER	7/21/80

EPA Form 8700-12 (6-80) REVERSE

Please print or type with ELITE type (12 characters/in[illegible]) in the unshaded areas only.

Form Approved OMB No. 158-S79016
No. 0246-EPA-OT

EPA

U.S. ENVIRON[illegible]AL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	OHD005044128
I. NAME OF INSTALLATION	AMERICAN CYANAMID CO*
II. INSTALLATION MAILING ADDRESS	PO BOX 148 PERRYSBURG, OH 43551
III. LOCATION OF INSTALLATION	12600 ECKEL RD PERRYSBURG, OH 43551

000061 JUL 25 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS

C

INSTALLATION'S EPA I.D. NUM	APPROVED	DATE RECEIVED (yr., mo., & day)
F 2	A	800725

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3

CITY OR TOWN | ST. | ZIP CODE

4

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5

CITY OR TOWN | ST. | ZIP CODE

6

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 CADWELL LEONARD PLANT MANAGER	419-874-7941

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 AMERICAN CYANAMID COMPANY

DETACH

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. 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 I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

OHD005044128

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

JUL 25 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S															
W	0	H	D	0	5	0	4	4	1	2	8		WA	C	2
1	2											13	14		15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001					
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 industrial 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
U008	U031	U147	U190	P100	U080
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 listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [X] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [ ] 4. TOXIC (D000)

X. 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 & OFFICIAL TITLE *(type or print)*	DATE SIGNED
L. E. Calvert	PLANT MANAGER	7/21/80

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

10 MAR 1988

5HS-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arthur Gustafson
Plant Manager
American Cyanamid Company
Post Office Box 148
Perrysburg, Ohio 43551

RE: Part B Call-in
American Cyanamid Company
12600 Eckel Road
Perrysburg, OH 43551
OHD 005 044 128

Dear Mr. Gustafson:

Some time ago, you should have received an acknowledgement of the United States Environmental Protection Agency's (U.S. EPA) receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. Accordingly, your facility is currently authorized with interim status under Section 3005(e) of RCRA. This letter constitutes the next step in the formal process leading toward issuance or denial of a RCRA permit. Under the authority of 40 CFR §270.10, this is a formal request for submittal of Part B of the permit application for the above-referenced facility. The Part B application is due six months from the date you receive this letter.

Enclosed is a copy of 40 CFR Part 270 which lists the items required for submitting the Part B permit application for your facility. A copy of the "Part B Completeness Checklist" is enclosed to help you in preparing a comprehensive and complete permit application.

If your facility chooses not to pursue a full RCRA permit, you may withdraw your intent to seek a permit by filing a closure plan with the U.S. EPA and Ohio Environmental Protection Agency (OEPA). Federal RCRA closure regulations (40 CFR Subpart G) require that you submit a closure plan to: George Hamper (5HS-13), Chief, Ohio Section, U.S. EPA - Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Approval by both Agencies is necessary prior to commencement of any activities that are part of the closure plan.

Some facilities may be unable to comply with the financial responsibility requirements for liability coverage under 40 CFR §264.147. If your facility is unable to meet these requirements, or any other applicable requirements of 40 CFR Parts 270 or 264, then we must deny the permit for your facility. In that case, you would probably want to submit a closure plan under 40 CFR Subpart G rather than the completed Part B application.

If your facility never actually treated, stored, or disposed of hazardous waste under RCRA, then it may not be necessary to submit either a Part B application or a closure plan. However, you will have to submit a Part A withdrawal request for review. This request must demonstrate that your facility never actually qualified for interim status because either: 1) the waste was not a hazardous waste as defined in 40 CFR §261; 2) that there has been no treatment, storage, or disposal of the waste since November 19, 1980; or 3) that the hazardous waste management process was exempt from the permitting requirements of RCRA. For example, storage of waste generated on-site in containers or tanks less than 90 days is exempt from the permitting requirements of RCRA in accordance with 40 CFR §262.34. Likewise, treatment in a wastewater tank is exempt under 40 CFR §270.1(c)(2)(u). A withdrawal request must incorporate the signatory requirements contained in 40 CFR §270.11.

The Agency is committed to conducting the RCRA permitting process as efficiently as possible. Consequently, you may want to contact Mr. Gerald Lenssen of my staff, at (312) 886-6184, to discuss any questions or concerns you have regarding the preparation of the application. Mr. Lenssen will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Should you have any questions about confidentiality of information, please refer to the enclosed rules on confidentiality as set forth in 40 CFR Part 2 and 40 CFR §270.12 of RCRA. If you anticipate asserting a claim of confidentiality, please review the above-referenced enclosure regarding substantiation of confidentiality (§2.208) that sets forth the criteria that must be met for claiming confidentiality.

Please be reminded that submission of the Part B application must be made six months from the receipt date (i.e., date this letter is received). Upon completion of the application, please send two copies to the U.S. EPA and three copies to the OEPA. Please number each page of the application uniquely, including all attachments (maps, specifications, etc.). A certification statement identical to the one stated in 40 CFR §270.11(d) must accompany each application and all additional submittals. Send two copies of the application to the following address:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
Post Office Box A-3587
Chicago, Illinois 60690-3587

Send three copies to: Thomas Crepeau
Ohio Environmental Protection Agency
Division of Solid & Hazardous Waste Management
Post Office Box 1049
Columbus, Ohio 43266-1049

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR §270.10. In addition, failure to answer this request may also result in subsequent enforcement action by the U.S. EPA.

Upon receiving the Part B application, the U.S. EPA will coordinate its review with the OEPA and will strive for the simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of the application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and OEPA, in lieu of U.S. EPA, will make the final determination on your permit application.

A copy of 40 CFR Part 264 is enclosed to help you in addressing the requirements and standards for the operation of treatment, storage and disposal facilities. These standards will become applicable to your facility upon issuance of a RCRA permit by U.S. EPA. A copy of the July 14, 1986, hazardous waste tank system regulatory amendments is also enclosed. These new rules establish technical standards and operating procedures for the owners and operators of tank systems that use tanks for accumulating, storing or treating hazardous waste. These rules may be applicable to your facility and are, therefore, enclosed for your information.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (HSWA) were signed into law. This new law amends RCRA and contains many provisions which may affect your facility. Under the corrective action requirements of HSWA, your facility is required to correct 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. Please note that the corrective action requirements apply to all solid waste management units, not just the hazardous waste management units subject to the permitting requirements. Enclosed is a document entitled "Certification Regarding Potential Releases from Solid Waste Management Units." It is necessary for you to complete and submit this form with your Part B application to help address corrective action requirements. If you previously completed and submitted this form, and if the information is accurate and up-to-date, you may simply include a copy of your previous submittal in your Part B application.

This Agency looks forward to working with you toward fulfilling the above request. Again, should you have any questions concerning the above matter, please contact us for assistance.

Sincerely,

William H. Miner

William H. Miner
Acting Associate Division Director
Office of RCRA

Enclosures: 40 CFR Part 270 (applicable parts)
Part B Completeness Checklist
40 CFR Part 2 (applicable parts)
40 CFR Part 264 (applicable parts)
Certification Regarding Potential Releases from Solid Waste Management Units

cc: Charles Taylor, OEPA
District Office Manager, OEPA
Ed Lim, OEPA

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 110

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: S F O H D 0 0 5 0 4 4 1 2 8 T/A 3 C D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold-faced terms**.

SPECIFIC QUESTIONS	MARK 'X' YES	MARK 'X' NO	MARK 'X' FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP AMERICAN CYANAMID COMPANY

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 GUSTAFSON ARTHUR M PLT. MNGR.	419 874 7941

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 P O BOX 148

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 PERRYSBURG	OH	43551

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 12600 ECKEL ROAD

B. COUNTY NAME

WOOD

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 PERRYSBURG	OH	43551	173

NOV 15 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2821 (specify) Molding Compounds and Synthetic Resins	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: AMERICAN CYANAMID COMPANY

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

Answer: P (specify)

D. PHONE (area code & no.): A 201 381 2000

E. STREET OR P.O. BOX: BERDAN AVENUE

F. CITY OR TOWN: WAYNE

G. STATE: NJ

H. ZIP CODE: 07470

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): N N255*BD	D. PSD (Air Emissions from Proposed Sources): P
B. UIC (Underground Injection of Fluids): U	E. OTHER (specify): (specify) see ATTACHMENT A
C. RCRA (Hazardous Wastes): R	E. OTHER (specify): (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9:A/50

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of alkyd and polyester molding compounds, and electrocoating resins.

F9:A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the 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.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
E. E. Standring, President Industrial Products Division	E E Standring	11/5/80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

110

FORM 3 RCRA

EPA

U[illegible]RONMENTAL PROTECTION AGENCY

HAZA[illegible]OUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S F O H D Ø Ø 5 Ø 4 4 1 2 8 TA 3 C 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* 71

C 8 15 — YR. 6 Ø 73 74 — MO. 1 1 75 76 — DAY 1 5 77 78

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

[ ] 2. NEW FACILITY *(Complete item below.)* 71

YR. 73 74 — MO. 75 76 — DAY 77 78

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS 72

[ ] 2. FACILITY HAS A RCRA PERMIT 72

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.
1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C — DUP — TA 3 C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S02	8,~~000~~ ~~000~~	G		7				
2	S01	11,~~000~~ * ~~000~~	G		8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

* Note

Line No.	Code	Explanation
2	S01	Capacity to accumulate up to 200 55-gallon drums.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

CONTINUE ON PAGE 3

110

Continued from page 2.

NOTE: Photocopy this page before completing if [illegible] more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W O H D Ø Ø 5 Ø 4 4 1 2 8 — T/A 1	W DUP — T/A 3 — C 2 — DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D002	84,000 000	P	S02	
2	D001	6,000 000	P	S01	
3	F003				Included with above
4	U031				Included with above
5	F001	50,000 000	P	S01	
6	U080				Included with above
7	D007	300 000	P	S01	
8	D008				Included with above
9	P100	300 000	P	S01	
10	U220	6,000 000	P	S01	
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

N/A

EPA I.D. NO. *(enter from page 1)*

S												T/A	C
F	0	H	D	0	0	5	0	4	4	1	2	8	6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 3 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
41 32 ~~058~~ 58Ø N	083 88 ~~044~~ 44Ø W

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER 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.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
E. E. Standring, President Industrial Products Division	E. E. Standring	11/5/80

X. OPERATOR 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.

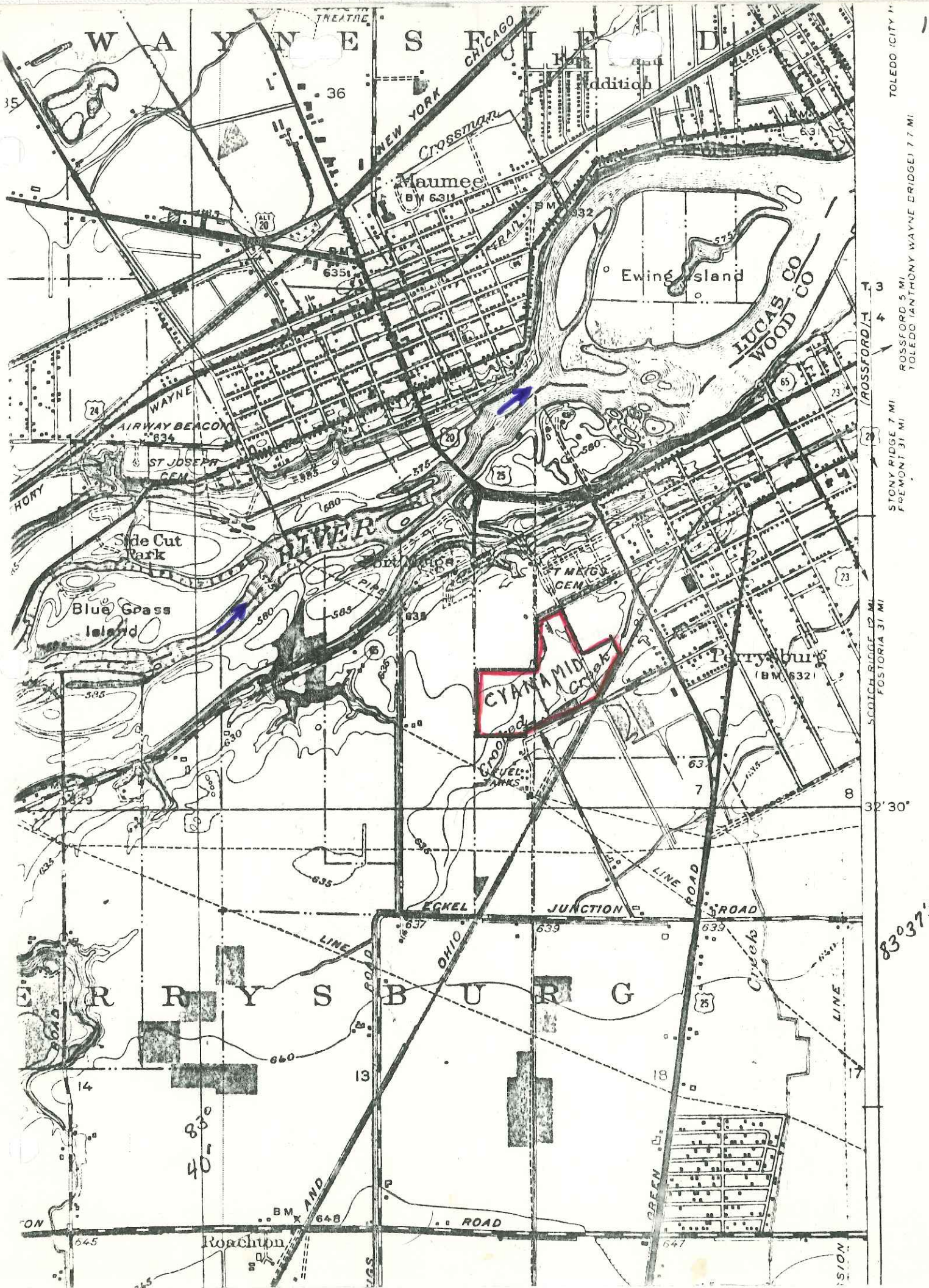
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

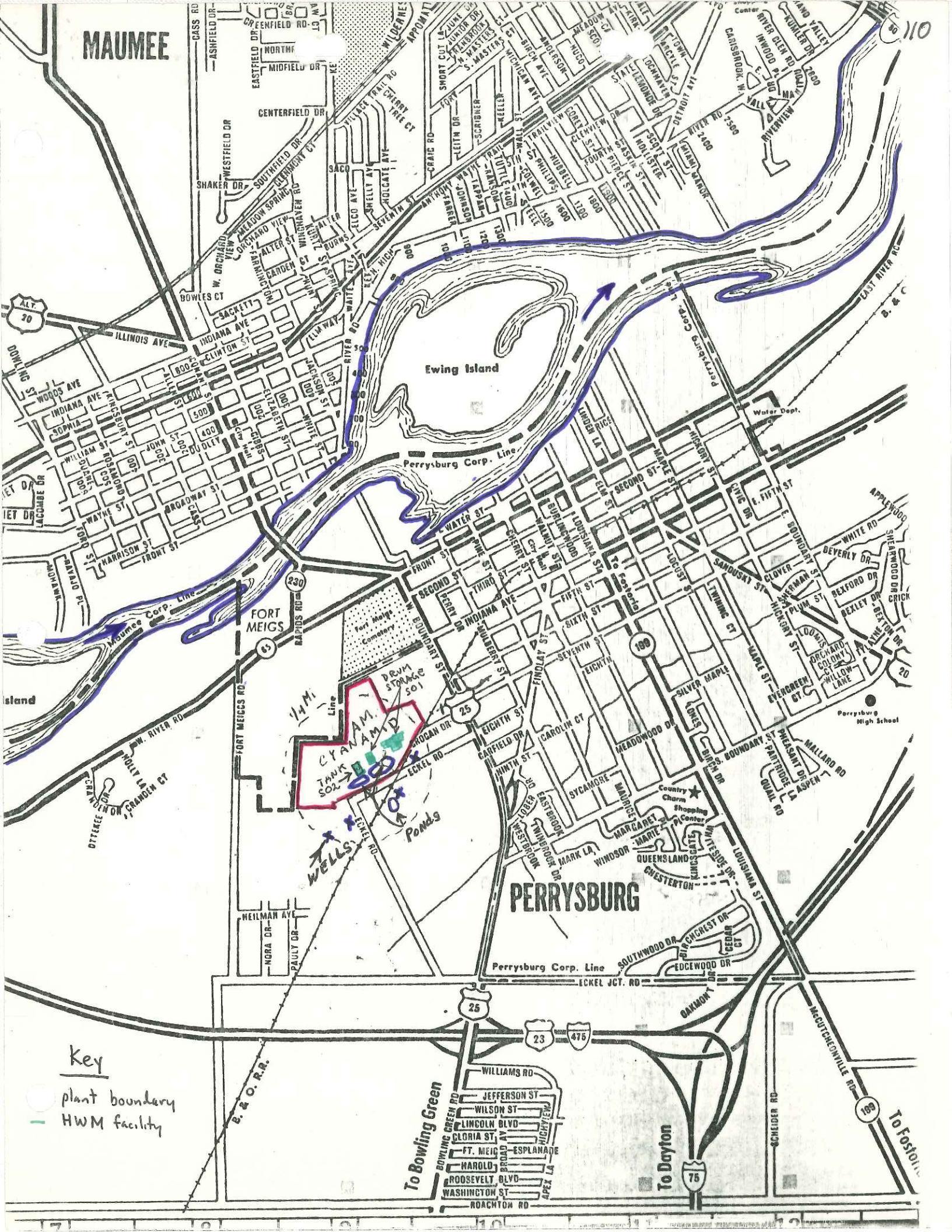
 CONTINUE ON PAGE 5

Continued from page 4.

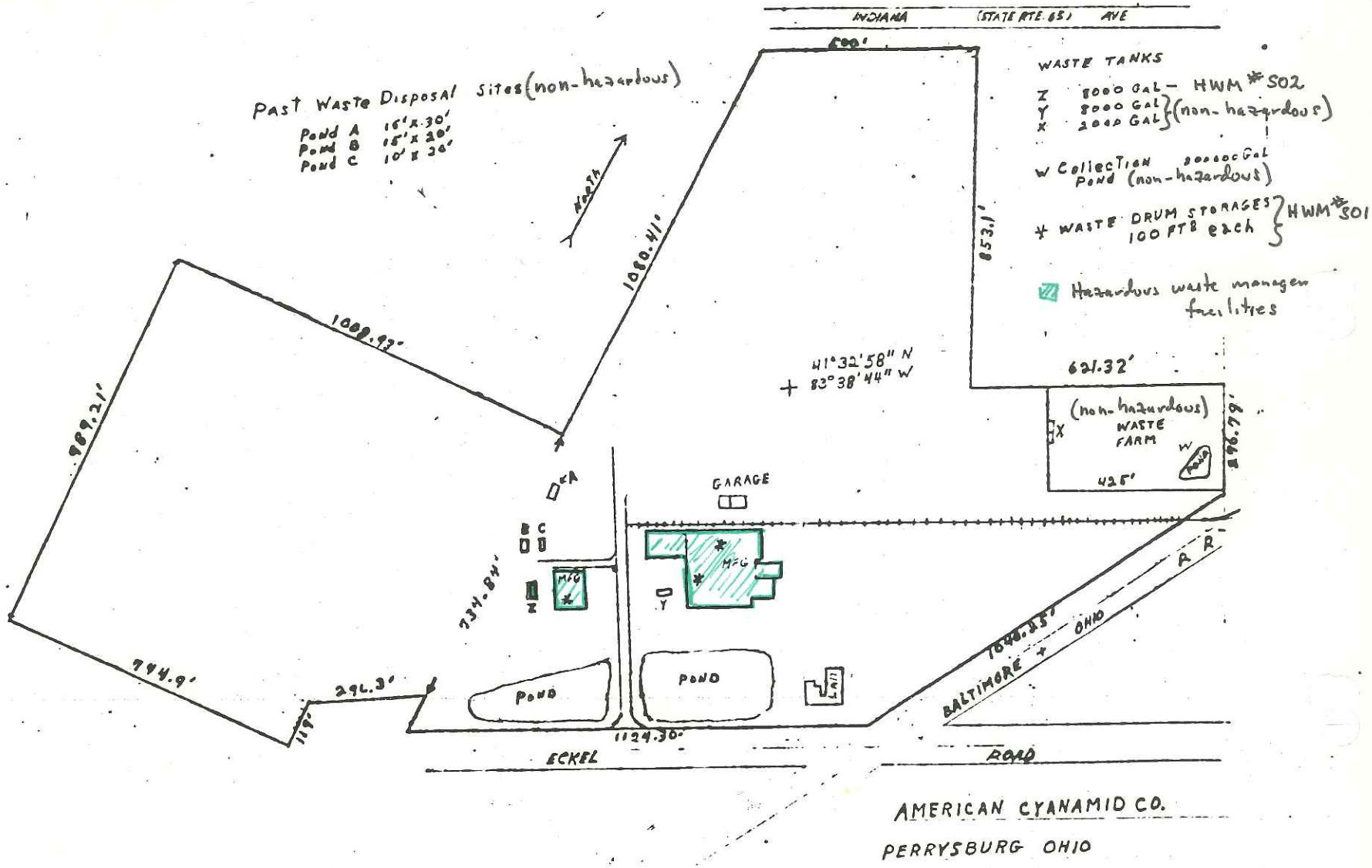
V. FACILITY DRAWING *(see page 4)*

N/A


WAYNESFIELD
Maumee
(BM 631)
Ewing Island
LUCAS CO
WOOD CO
Side Cut Park
Blue Grass Island
RIVER
CYANAMID
Perrysburg
(BM 632)
ECKEL JUNCTION ROAD
OHIO
Roachton
TOLEDO (CITY M
ROSSFORD 5 MI
TOLEDO (ANTHONY WAYNE BRIDGE) 7.7 MI
STONY RIDGE 7 MI
FREMONT 31 MI
SCOTCH RIDGE 12 MI
FOSTORIA 31 MI
32'30"
83°37'30"
83°
40'


MAUMEE
Ewing Island
Perrysburg Corp. Line
Maumee Corp. Line
FORT MEIGS
Fort Meigs Cemetery
DRUM STORAGE 501
CYANAMID
TANK SO2
Ponds
WELLS
PERRYSBURG
Perrysburg High School
Water Dept.
Country Charm Shopping Center
Perrysburg Corp. Line
To Bowling Green
To Dayton
To Fostoria
B. & O. R.R.
Key
plant boundary
HWM facility

V. Facility Drawing



CYANAMID

P. O. Box 148
Perrysburg, OH 43551

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 14, 1980

EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, IL 60680

Dear Mr. Kim:

Attached herewith is Part A, Application for a Hazardous Waste Permit for the Perrysburg plant submitted in accordance with the regulations contained in EPA's Consolidated Permits Program.

This submission or any past or future discussions or communication with respect to this matter is not intended to admit any liability or to waive any rights.

Very truly yours,

Arthur M. Gustafson
Plant Manager

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

RECEIVED
WMD RCRA
RECORD CENTER FEB 08 1994

George V. Voinovich
Governor

Donald R. Schregardus
Director

January 31, 1994

Cytec Industries, Inc.
Attn: J. G. DeMarco
P.O. Box 148
Perrysburg, OH 43552

This is in response to your letter of January 20, 1994 regarding the following installation:

U.S. EPA ID NUMBER: OHD005044128

LOCATION OF INSTALLATION: 12600 Eckel Road
Perrysburg, OH 43552

According to the information submitted, the owner and/or operator of the above installation has changed. In order for the U.S. EPA ID Number to be transferred to the new owner/operator, please complete the enclosed Notification of Hazardous Waste Activity (EPA Form 8700-12). Return the completed Notification to:

Ohio EPA
Division of Hazardous Waste Management
Attn: Data Management Section
1800 Watermark Drive
Columbus, Ohio 43215

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

Sincerely,

Thomas E. Crepeau

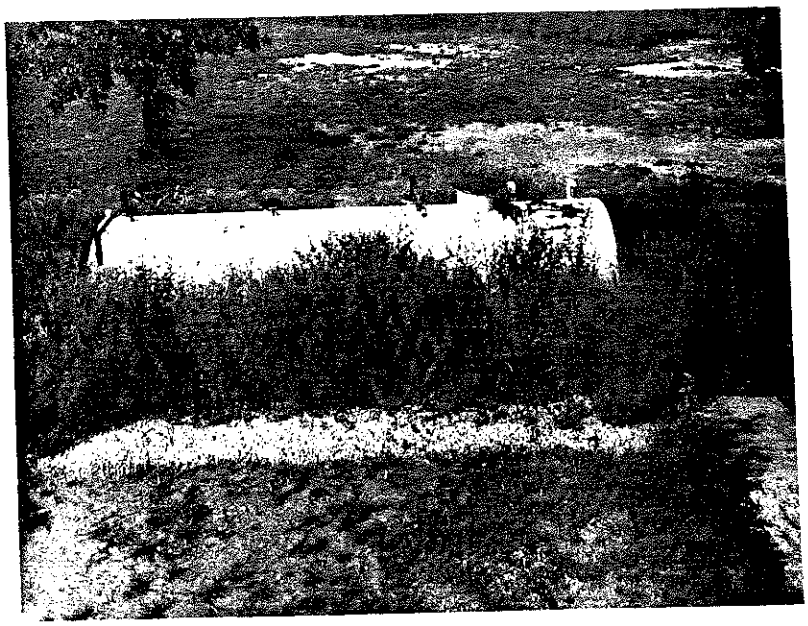
Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/bab

Enclosure

cc: U.S. EPA, Region V

Printed on recycled paper



Tank 802

Empty Drum Storage S01

Waste Solvent Storage S01

A.4 Closure/ Post-Closure

OhioEPA

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

December 7, 1990

Re: American Cyanamid Company
US EPA ID No.: OHD005044128
Ohio Permit No.: 03-87-0383
HW Container Storage Area
Completion of Closure Process

American Cyanamid Company
Attn: Mr. John Clulow
12600 Eckel Road
P.O. Box 148
Perrysburg, Ohio 43551

Dear Mr. Clulow:

According to our records, all necessary activities have been completed at your facility regarding closure of the hazardous waste container storage area. Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you have gone through formal closure and will maintain the status of a generator with less than 90 day storage.

You should continue to use the identification number assigned to you by US EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the Ohio EPA, Northwest District Office, Attn: Randy Puckett, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402, telephone: (419) 352-8461.

If you intend to no longer pursue your Ohio Hazardous Waste Installation and Operation Permit and wish to withdraw your permit, the following information should be forwarded to Ohio EPA within thirty (30) days:

1. A formal request for withdrawal signed by an authorized representative according to Rule 3745-50-42(A)-(D) of the Ohio Administrative Code (Attachment 1) including a full explanation of your reasons for withdrawal of your application; and,

2. A certification statement signed by the same authorized representative of your facility (Attachment 2).

C305 = $
1105 = $
1103 = $
119 = 3

Upon receipt of the above items, Ohio EPA will review your submission along with any facility inspection report(s). If no additional information is necessary, your permit withdrawal request will be finalized.

Please forward the above information to: Ohio EPA, Division of Solid and Hazardous Waste Management, Attn: Thomas E. Crepeau, Data Management Section, 1800 WaterMark Drive, Columbus, Ohio 43266-0149.

Please note that you must notify U.S. EPA of your change in status, if you have not already done so.

Should you have further questions concerning this procedure, please call Randy Sheldon, Data Management Section at (614) 644-2977.

Very truly yours,

Thomas E. Crepeau

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

TC/RS/ds

cc: Lisa Pierard, US EPA, Region V
Hazardous Waste Facility Board
Randy Meyer, RCRA TAS, DSHWM
Lori Stevenson, RCRA Enf. Section, DSHWM
Randy Puckett, NWDO, DSHWM
YEC/ File

2006R/78-79

OhioEPA

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

Dan

CLOSURE PLAN EXTENSION APPROVAL

CERTIFIED MAIL

May 3, 1990

Re: Closure Plan Extension
American Cyanamid Company
OHD 005 044 128/03-87-0383

John Clulow
Quality Control Manager
American Cyanamid Company
P.O. Box 148, 12600 Eckel Road
Perrysburg, Ohio 43551

Dear Mr. Clulow:

On February 13, 1990, American Cyanamid Company submitted a request for an extension to the closure period specified in the approved closure plan for 90 days. The extension request was submitted pursuant to OAC Rule 3745-66-13(B) as closure will require longer than the 180 days period specified in OAC Rule 3745-66-13. American Cyanamid Company has requested this extension due to the need to complete decontamination of the container storage area.

Therefore, closure of the container storage area will require greater than 180 days because of the need to complete decontamination of the container storage area. American Cyanamid Company will continue to take all steps to prevent a threat to human health and the environment from the closed but inactive waste management unit per OAC Rule 3745-66-13(B)(2).

The public was given the opportunity to submit written comments regarding the request for an extension to the closure period for American Cyanamid Company in accordance with OAC Rule 3745-66-13. The public notice appeared in the week of February 26, 1990, in the Daily Sentinel. No comments were received in this matter.

An extension of time allowed for closure is hereby approved. All closure activities shall be completed by May 16, 1990.

OHIO E.P.A.

MAY -3 90

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: Mary Cavini Date 5-3-90

Please be advised that approval of this closure extension request does not release American Cyanamid Company 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.

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 a registered professional engineer that the facility has been closed in accordance with the approved closure plan. The owner or operator certification shall follow the format specified in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

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 and the Environmental Enforcement Section of the Office of the Attorney General 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, 250 East Town Street, Room 101, Columbus, Ohio 43266-0557.

Sincerely,

Richard L. Shank

Richard L. Shank, Ph.D.
Director

RLS/RM/pas

cc: Tom Crepeau, Central File, Ohio EPA
Don North, NWDO, Ohio EPA
Randy Meyer, DSHWM, Ohio EPA
Lisa Pierard, USEPA, Region V
Joel Morbito, USEPA, Region V
Chuck Hull, NWDO, Ohio EPA

1793U/64

OHIO E.P.A.

MAY -3 90

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: Mary Cavin Date 5-3-90

Ohio EPA

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

DAN

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

November 16, 1989

Re: Closure Plan
American Cyanamid Company
OHD 005 044 128/03-87-0383

John G. DeMarco
American Cyanamid Company
P.O. Box 148
Perrysburg, Ohio 43551

Dear Mr. DeMarco:

On September 2, 1988, American Cyanamid Company submitted to Ohio EPA a closure plan for two (2) hazardous waste container storage areas located at 12600 Edkel Road, Perrysburg, Ohio. Revisions to the closure plan were received on August 28, 1989, in response to my April 7, 1989, closure plan disapproval letter. This plan was further revised by submissions on September 18, 1989; October 4, 1989; and October 10, 1989. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that American Cyanamid Company's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of American Cyanamid Company in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that, with modifications, the closure plan for the hazardous waste facility at American Cyanamid Company meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by American Cyanamid Company is hereby approved.

Please be advised that approval of this closure plan does not release American Cyanamid Company 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

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: Mary Carni Date 11-16-89

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

NOV 16 1989

environment, issue 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.

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 and the Environmental Enforcement Section of the Office of the Attorney General 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 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 Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,

Richard L. Shank

Richard L. Shank, Ph.D.
Director

RLS/RM/pas

cc: Randy Meyer, Ohio EPA, DSHWM
Joel Morbito, USEPA - Region V
Chuck Hull, NWDO, Ohio EPA
Lisa Pierard, USEPA-Region V
Tom Crepeau, Ohio EPA, DSHWM
Don North, NWDO, Ohio EPA

2005U 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: Mary Cavin Date 11-16-89

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

NOV 16 1989

OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

~~not Jerry~~
DAN

Toward A Cleaner Environment
15 Year Anniversary 1972 - 1987

Richard F. Celeste
Governor

CLOSURE PLAN DISAPPROVAL
Issuance Date APR 07 1989
Effective Date MAY 08 1989

April 7, 1989

CERTIFIED MAIL

Re: Closure Plan
American Cyanamid Co.
OHD 005 044 128/03-87-0383

A.M. Gustafson
Plant Manager
American Cyanamid Co.
P.O. Box 148
Perrysburg, OH 43551

Dear Mr. Gustafson:

On September 2, 1988, American Cyanamid Co. submitted to Ohio EPA a closure plan for the hazardous waste storage area located at 12600 Eckel Road, Perrysburg, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that American Cyanamid Co.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of American Cyanamid Co. in accordance with OAC Rule 3745-66-12. The public comment period extended from October 24, 1988, to December 1, 1988. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at American Cyanamid Co. does not meet the performance standard contained in OAC Rule 3745-66-11 and does not comply with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by American Cyanamid Co. is hereby disapproved (see Attachment A).

Due to the fact that the Ohio EPA is not currently authorized to conduct the federal hazardous waste program in Ohio, your closure plan also must be reviewed by USEPA. Federal RCRA closure regulations (40 CFR 265.112) require that you submit a closure plan to Lisa Pierard, Chief, Waste Management Division, Technical Programs Section, Ohio Unit, USEPA, Region V, 5HS-13, 230 South Dearborn Street, Chicago, Illinois 60604. Review and approval of the closure plan by both agencies is necessary prior to commencement of activities required by the approved closure plan.

You are notified that this action of the Director is issued as a proposed action pursuant to ORC Section 3745.07. This action will become final on the effective date indicated unless you or an objector files an appeal requesting an adjudication hearing within thirty (30) days of the date of issuance of this action. The adjudication hearing will be conducted in accordance with OAC Chapter 3745-47. The request for a hearing shall specify the issues of fact and law to be contested. Requests for hearings shall be sent to: Ohio Environmental Protection Agency, Hearing Clerk, 1800 WaterMark Drive, P.O. Box 1049, Columbus, OH 43266-0149.

A modified closure plan addressing the deficiencies enumerated in Attachment A must be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter in accordance with OAC 3745-66-12. The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Janet Leite, Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio, 43402.

Sincerely,

Richard L. Shank, Ph.D.
Director

RLS/RM/ps

cc: DSHWM Central File, Ohio EPA
Lisa Pierard, USEPA, Region V
Janet Leite, NWDO, Ohio EPA
Chuck Hull, NWDO, Ohio EPA
Randy Meyer, DSHWM, Ohio EPA

1774U

ATTACHMENT A
AMERICAN CYANAMID CO.
PERRYSBURG, OHIO PLANT

1. American Cyanamid shall list the USEPA hazardous waste numbers and chemical names for all wastes stored on-site.

2. Capacity of the storage area is given, but it does not equal that of the Part A Permit. American Cyanamid shall resolve this discrepancy.

3. American Cyanamid shall provide a scaled drawing showing the container storage area and any appurtenances.

4. References should be made to the air and landfarm permits the company holds.

5. American Cyanamid shall provide an estimate of the maximum quantity of inventory (separated by waste type) stored on-site.

6. Off-site treatment and disposal facilities which may be used must be listed and their operating status and USEPA identification numbers cited.

7. American Cyanamid shall provide specific steps and procedures for decontamination of the concrete storage area and disposal of rinseate. Information on cleaning agents, equipment, sampling method and the sampling protocol for determining if rinseate is hazardous shall be provided.

8. Rinseate samples from the drum storage area shall be analyzed for all RCRA regulated hazardous waste solvents stored on-site. The storage area shall not be considered decontaminated until the final rinseate does not exceed the public drinking water maximum contaminant level (MCL) for any hazardous waste constituent. If an MCL is not available for the constituent of concern, the maximum contaminant level goal (MCLG) shall be used. If the MCLG is less than the contaminant's analytical detection limit using methods found in USEPA Publication SW-846, the SW-846 analytical detection limit shall be used as the clean standard. If neither an MCL or an MCLG is available, 1 mg/l shall be used as the clean standard. [MCLs are listed in 40CFR 141.11 and OAC 3745-81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics. MCLGs are listed in 40 CFR 141.50.] Rinseates exceeding the above criteria for any non-naturally occurring RCRA regulated compounds shall be managed as hazardous waste.

9. American Cyanamid shall state specific on-site and off-site treatment and/or disposal methods for hazardous rinseate and non-hazardous rinseate.

10. American Cyanamid shall include a description of the facility's security system (including warning signs).

11. The plan shall be revised to state the actual year of closure expected (most likely 1989) rather than 2003.

12. American Cyanamid shall provide a milestone chart showing all critical closure activities and the time required to complete each activity. The closure schedule shall begin with the date of Ohio EPA or USEPA approval, whichever is later, and not rely on calendar dates.

13. American Cyanamid's and the independent registered engineer's certifications of closure shall follow the signature requirements found in OAC 3745-50-42. American Cyanamid's certification statement must include the exact wording found in OAC 3745-50-42(D).

14. The plan shall explain that Ohio EPA's NWDO facility inspector will be contacted at least five (5) business days in advance of certain critical activities, such as rinseate sampling, so that the inspector may be present to observe these activities.

15. The independent registered professional engineer shall be present at all critical activities during closure. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Ohio EPA reserves the right to request a copy of the engineer's log book for verification purposes prior to confirming that closure was completed in accordance with the approved closure plan.

16. Location on a topographic or county map shall be provided, plus a more detailed map or diagram of the facility, with the drum storage area clearly located and identified. Map scale shall be specified.

17. American Cyanamid must clearly show that measures will be taken to protect all personnel (including contractors and visitors) involved in the closure or possibly exposed to hazardous waste by the closure activity.

18. Sampling methods and equipment, as well as laboratory analytical methods, shall follow guidance in USEPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition".

Dan

Ohio EPA

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

October 28, 1988

Re: American Cyanamid Company
U.S. EPA ID No.: OHD005044128
Ohio Permit No.: 03-87-0383
Closure Plan

American Cyanamid Company
Attn: A. M. Gustafson, Plant Manager
P.O. Box 148
Perrysburg, Ohio 43551

Dear Sir:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for American Cyanamid Company located at 12600 Eckel Road, Perrysburg, Ohio will appear the week of October 24, 1988, in the The Daily Sentinel Tribune, Bowling Green, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, December 1, 1988.

Copies of the closure plan will be available for public review at the Wood County District Library, 251 N. Main Street, Bowling Green, Ohio 43402 and the Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402.

Please contact me at (614) 644-2934, if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau

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

TEC/dhs

cc: Rebecca Strom, U.S. EPA, Region V
Randy Meyer, Ohio EPA, DSHWM, TA&ES
Rich Dreschel, Ohio EPA, DSHWM, NWDO

2215R(97)

PUBLIC NOTICE Wood County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: American Cyanamid Company, 12600 Eckel Road, Perrysburg, Ohio, U.S. EPA ID No.: OHD005044128, Ohio Permit No.: 03-87-0383. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for drum/tank storage for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous 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.

Copies of the facility's Closure Plan will be available for public review at the Wood County District Library, 251 N. Main Street, Bowling Green, Ohio 43402 and the Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402. Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.

OhioEPA

State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049
(614) 466-8565

Richard F. Celeste, Governor

RE: American Cyanamid
OHD 004341509
OHD 005044128

Mr. James P. Watkins
Vice President
American Cyanamid Co.
One Cyanamid Plaza
Wayne, NJ 07470

July 28, 1986

Dear Mr. Watkins:

I hereby acknowledge the receipt of a 1986 RCRA financial test demonstration update, prepared on behalf of the facilities referenced above.

Ohio EPA has completed its review of American Cyanamid's financial test submission. In general, American Cyanamid appears to meet the financial test criteria. However, I have noted several problems that should be corrected or clarified concerning the financial test demonstration.

- Explain why closure costs have not changed or decreased since last year's financial test filing for the following facilities:

  OHD 005044128
  CTD 000842484
  NJD 002173144
  NCD 003168168
  MID 005360680
  OHD 005044128
  MOD 050226075

- Explain why closure costs for IND 005159546 were not included in this year's financial test filing.

- There are several different post closure costs on file for the Marietta facility. Our district office shows $35,000, your annual report indicates $33,066, and the financial test covers $995,080. Please clarify.

Please submit the corrected information to my attention by August 29, 1986. If you have questions, please contact me at (614) 462-6733.

Sincerely,

Edward A. Kitchen
Surveillance & Enforcement Section
Division of Solid & Hazardous
Waste Management

cc: Dave Sholtis, DSHWM
J. W. Bodamer, American Cyanamid
Steve Hamlin, SEDO

AMERICAN CYANAMID CO.

PERRYSBURG, OHIO PLANT

CLOSURE PLAN

HAZARDOUS WASTE STORAGE AREAS

Background

The Perrysburg Plant of American Cyanamid Company manufacturers fiber glass reinforced thermosetting molding compounds and electrocoating resins. The address is 12600 Eckel Road, Perrysburg, Ohio 43551.

Manufacturing, technical and office facilities are situated on a 65.13 acre plot. The main manufacturing building, where molding compounds are made, occupies 42,020 square feet of space and includes the administrative offices. Electrocoating resins are manufactured in a separate building totaling 4000 square feet. Both the main building and electrocoating resins building have mezzanine areas. The Technical Dept. is located in an additional separate facility which totals 3594 square feet, including a small pilot plant.

The manufacture of molding compounds basically involves the mixing of various fillers, resins, fiberglass, pigments, catalysts and inhibitors in equipment designed for this purpose. The material is then transferred to an extruder where it is processed and packaged into a final shape or form, based on customer requirements, or packaged directly from the mixer in bulk form, if this is desired by the customer.

Hazardous waste is generated in this operation by the use of methylene chloride as a cleaning agent for equipment and tools, mainly due to product color changes. The methylene chloride is used strictly as a solvent to dissolve and clean the metal surfaces of the previously run product so as not to color contaminate subsequent material. There is no chemical reaction involved.

Used or waste methylene chloride is collected and transported to designated storage areas where it is stored in labeled 55 gallon drums. When 20-30 full drums have been assembled these are sent out for reclaiming.

Electrocoating resins manufacturing involves the reaction of various monomers, acid and catalyst to produce a resin in solution with an additional solvent or solvents. Material produced may be packaged in pails, drums or shipped bulk for sale to our customers.

Hazardous waste in this operation is generated mainly by the flushing of the feed line to the reactor, at the conclusion of each run, with a solvent. This wash solvent is then drained from the system, collected and transported to a designated storage area where it is stored in 55

gallon drums prior to disposal off-site. This is done in order to prevent the gelling of unreacted monomer in the feed line when the plant stands idle. Up to 10 drums may be stored in this area.

The pilot plant is used to produce trial batches and small production orders for molding compounds. No resins are produced. A small amount of hazardous waste is generated in the area as the result of using methylene chloride in the cleaning of equipment and tools. This is handled in the same manner as in the molding compounds manufacturing operation. Usually only one drum is stored in this designated area.

Security of all storage areas is enhanced by the fact that all hazardous waste is stored inside on concrete floors. There is no outside storage of any hazardous waste. Inspection of the storage areas is regularly made and a record is maintained of the amount and type of waste on hand in each of the areas. Signs are posted at each designated area denoting the type of waste stored in the area. All drums are stored on pallets and labeled.

Closure Date

It is expected the use of these areas for the storage of hazardous waste materials will continue and they will not be closed so long as hazardous waste is generated from the manufacturing operations or the year 2003, whichever comes first.

Capacity and Inventory Information

There is no specific design capacity for the various areas, since they are all located indoors and storage of all waste drums is on concrete floors, thus the area could be expanded or contracted as required. However, this is not normally done. At present, space is provided for the storage of 70 drums. Normal inventory level ranges from 20-25 drums total for all areas. This could range up to a maximum of 60 drums.

Copies of the inventory record form and waste storage inspection instructions are included for information purposes.

Waste Analysis Plan

Normally an analysis is not required before any of our hazardous wastes are disposed of by shipping to a disposal or recovery site because it is known what the wastes will be prior to their generation.

However, whenever there is any question as to the characteristics of the waste generated or an unknown drum is found, the following procedures should be used to establish positive identification:

I. Waste Classifications

a) Used methylene chloride - Drums
b) Waste wash solvent (Resin Plant) - Drums
c) Non-aqueous alkyd distillate - Drums

II. Sampling Method

If samples are required vent drums first to relieve any pressure buildup, make sure bungs are tight and roll drum to thoroughly mix contents. With drum in upright position, take aliquot samples through bung and composite for analysis.

III. Parameters for Analysis

a) Identity
b) Ignitability if indicated

IV. Test Methods

a) Identity - Check odor. Used methylene chloride will have a distinctivemethylene chloride odor and appearance should be cloudy with suspended solids and pigment coloration. Waste wash solvent in the resin plant will have a distinctive solvent (cellosolve) odor.
b) Ignitability - Determine flash point by a Pensky-Martens closed Cup Tester, or other approved test method, if investigation indicates the need for this check.
c) ph - Determine ph with a ph meter using the test method specified in the "Test Methods For the evaluation of Solid Waste, Physical/Chemical Methods" or other approves test method if investigation indicates the need for this check.

V. Disposition

a) Used methylene chloride - Ship via approved outside agency for recovery and return of methylene chloride following the Cyanamid corporate manifesting procedure.
b) All other hazardous waste drums - Ship via approved outside agency for disposition following the Cyanamid corporate manifesting procedure.

Procedure For Closure

Notify the director of Ohio EPA prior to 180 days of the expected closure date.

Prepare all remaining drums of hazardous waste for shipment as per prescribed procedures for labeling, etc. Using properly prepared manifest, ship material off-site via a permitted transporter to a permitted off-site disposal company or reclaimer.

The in-plant storage areas used for the storage of hazardous waste drums will be carefully examined for evidence of contamination by material stored in the drums. If an area is found to be contaminated it will be cleaned by whatever menas necessary and the resulting residue of hazardous waste will be transferred to drums for disposal by permitted agencies.

At the same time, any equipment found to be contaminated with hazardous waste would also be cleaned and the residue disposed of, in the same manner.

No treatment of hazardous waste is done on-site, therefore, no treatment residues remain.

Supply certification of closure by an independent registered professional engineer to the Director of Ohio EPA.

Time Schedule and Estimated Costs For Closure

		Time	Cost
1)	Prepare and ship final inventory of hazardous waste material	8 weeks	$4,500
2)	Inspect and clean waste storage areas and equipment, if necessary (this may be done concurrently with number 1 above)	2 weeks	$250
3)	Certification of clousre	3 weeks	$250
	Totals	13 weeks	$5,000

It is estimated that no more than $5,000 would be required to complete the cleanup as detailed above. Since most of the hazardous waste involved would be used methylene chloride, we would expect the reclaimer to credit our account for the methylene chloride recovered, thus lowering our final drum disposal charge.

CYANAMID

-CERTIFIED MAIL-

American Cyanamid Company
P.O. Box 148 — 12600 Eckel Rd.
Perrysburg, OH 43551
(419) 874-7941

August 31, 1988

RECEIVED
SEP 6 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. George Hamper (5H5-13)
Chief, Ohio Section
U.S. EPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

RE: Part B Call-in
American Cyanamid Company
12600 Eckel Road
Perrysburg, OH 43551
OHD005044128

Dear Sir:

We hereby request cancellation of the above referenced RCRA interim status (Part A) application which we submitted on November 5, 1980. We wish to retain our EPA I.D. number since we would continue to generate hazardous waste.

Our interim permit lists 11,000 gallons of drum storage and 8,000 gallons of tank storage. We would point out that the tank storage has never been used for the storage of hazardous waste. The drum storage areas are dedicated areas within the confines of our buildings.

A thorough review and consideration of our experience in the handling and storage of hazardous waste indicates that we could readily adhere to the regulation for storage of hazardous waste for less than 90 days which is excluded from the permitting requirements of RCRA per 270.1 (c) (2) (i).

We would continue to manage the waste and maintain the present storage areas for the same type of waste subject to the 90 day storage limit in accordance with Subpart I of Part 265.

Since we are requesting cancellation of our interim status we will not submit the Part B of the permit application as requested in your letter of March 10, 1988.

As per your request we have enclosed a copy of the storage facilities closure plan for your use. Since we will continue to use the drum storage areas to store hazardous waste for less than 90 days, we will close these facilities in the future in accordance with the plan as required by 265.111 and 265.114. At present this closure is expected to take place in 2003.

If you should have any questions, please advise. Thank you for your attention to this matter.

Sincerely,

A. M. Gustafson
Plant Manager

AMG:sa

cc: Mr. William H. Miner
Acting Associate Division Director
Office of RCRA
United States Environmental Agency
Region 5
230 South Dearborn St.
Chicago, Illinois 60604

Mr. Thomas Crepeau
Ohio Environmental Agency
Division of Solid and Hazardous Waste Management
P. O. Box 1049
Columbus, Ohio 43266-1049

B. Permit Application /Post Permit

OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Toward A Cleaner Environment
15 Year Anniversary 1972 - 1987

Richard F. Celeste
Governor

March 4, 1988

RE: OHIO PART B CALL-IN
US EPA ID NO.: OHD005044128
OHIO PERMIT NO.: 03-87-0383

CERTIFIED MAIL

Mr. Arthur M. Gustafson, Plant Manager
American Cyanamid Company
P.O. Box 148
Perrysburg, OH 43551

Dear Mr. Gustafson:

The purpose of this letter is to formally request the submittal of Part B of your Ohio hazardous waste permit application according to the requirements of Rule 3745-50-40(A)(2) of the Ohio Administrative Code.

Although you may have already submitted a Part B application to the US EPA, that application was for your federal RCRA permit. According to Ohio regulations, a Part B application must be reviewed by the Ohio EPA as part of the renewal process for your Ohio hazardous waste permit application.

Ohio regulations provide up to six months for submittal of the Part B permit application. You are requested to submit the Part B within six months of the date of this letter in order to expedite the review of your application and the issuance of a final determination of the Director or of the Hazardous Waste Facility Board, as appropriate. Please submit two copies of the Part B as follows:

Ohio EPA
Division of Solid and Hazardous Waste Management
Program Planning and Management Section
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

If you have submitted a Part B application to Ohio and US EPA under federal requirements and you do not wish to provide additional information, Ohio EPA will use the Part B that is on file for review. Please inform this office if the file copy is to be used. However, all applicants are required to submit a completed checklist as explained in the following paragraph.

Attached you will find a checklist of information to be included in a Part B application which cross-references 40 CFR 270 and 264 regulations with Rules 3745-50 to 3475-69 of the Ohio Administrative Code. Please complete this checklist stating precisely on which page(s), figure(s), etc. of your application each applicable Ohio rule has been addressed. If a rule is not applicable to your facility, please so indicate on the checklist.

If you have questions regarding the contents of this letter, or need additional guidance, please contact either Ed Lim, (614) 481-7239, or Thomas E. Crepeau, (614) 481-7217, of the Division of Solid and Hazardous Waste Management.

Sincerely,

Richard L. Shank, Ph.D.
Director

RLS/RR/ep
2067R/22-23

Attachment

cc: NWDO

C.2 Compliance/ Enforcement

APR 4 1990

5HR-12

Mr. John DeMarco
American Cyanamid Company
P.O. Box 148
Perrysburg, Ohio 43551

Re: Compliance Letter
American Cyanamid Company
OHD 005 044 128

Dear Mr. DeMarco:

On November 14, 1989, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of Chapter 3734 of the Ohio Revised Code, and also 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.

As a result of the inspection, it appears that the subject facility is in compliance with the land disposal restriction regulations found in 40 CFR Part 268.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Gregory T. Carlson of my staff at (312) 886-8095.

Sincerely yours,

4-3-90

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT.	MC	SKS	
DATE	4-3-90	4-3-90	

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA

bcc: Sally Swanson, REB

5HR-12 carlson.walker 6-8093 diskette #2 mini filename: DeMarco.comp

OhioEPA
State of Ohio Environmental Protection Agency

Northwest District Office
1035 Devlac Grove Dr.
Bowling Green, Ohio 43402
(419) 352-8461

Jean - this is yours.

~~CMGL~~
~~TDSP~~
LBAN
ISS

Richard F. Celeste
Governor

Re: Wood County
American Cyanamid Company
OHD 005044128
Hazardous Waste

December 14, 1989

Mr. John DeMarco
American Cyanamid Company
P. O. Box 148
Perrysburg, Ohio 43551

Dear Mr. DeMarco:

An interim status inspection was conducted by the Ohio EPA at American Cyanamid Company, 12600 Eckel Road, Perrysburg, in your presence on November 14, 1989. The purpose of the inspection is to assess the Company's compliance with state regulations applicable to a hazardous waste generator and storage facility. No violations of state law were noted at the time of the inspection.

The results of the land disposal restriction portion of the inspection are being forwarded to the U.S. EPA for follow-up.

You are hereby advised that total compliance with the regulations contained in the hazardous waste rules of the State of Ohio is required as a condition of continuing interim status.

The methylene chloride used for cleaning mixers at your plant should be characterized as F002.

American Cyanamid Company in Perrysburg should receive new Generator and Facility Annual Report forms in January. Please contact Mr. Keith Dimoff of our Central Office at (614) 644-2923 if you do not receive them. They are due back by March 1, 1990.

Failure to list specific deficiencies in this letter 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. If you have any questions, please contact me immediately.

Sincerely,

Don North

Donald F. North
Division of Solid and
Hazardous Waste Management

Enclosure
/ckl
cc: NWDO File
Janet Leite, DSHWM/NWDO
Teri Martin, DSHWM/CO

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: American Cyanamid Company

U.S. EPA I.D. No.: OHD 005044128

Street: P.O. Box 148, 12600 Eckel Rd.

City: Perrysburg State: Ohio Zip Code: 43551

Telephone: (419) 874-7941

Operator: American Cyanamid Company

Street: Berdan Ave.

City: Wayne State: N.J. Zip Code: 07470

Telephone: (201) 831-2000

Owner:

Street:

City: State: Zip Code:

Telephone:

Inspection Date: 11/14/89 Time: 9:00 Weather Conditions: Fair

	Name	Affiliation	Telephone
Inspectors:	Don North	Ohio EPA-NWDO	(419) 352-8461

Facility Representatives: John DeMarco – Plant Manager

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	✓	✓		
Transporter				
Treater				
Storer	✓	✓		
Disposer				

Revised 9-26-88

INSPECTION SUMMARY

American Cyanamid Company manufactures alkyd and polyester molding compounds, and electrocoating resigns. Used for electrical household circuit breakers distributor caps (automotive).

There are 2 drum storage areas that have never been used for greater than 90 day storage. Both areas are indoors on concrete floors

A closure plan has been approved by Ohio EPA on November 16, 1989. Closure will begin soon and OEPA will be notified of each step and welcomed to observe.

The company generates waste methylene chloride used for cleaning mixers. It will continue to reduce and finally eliminate the need for methylene chloride by replacing w/ N.H. surfactant to be used in heated tank or heated for use in mixers.

No violations observed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	____	____	____	____	____
2.	F002	✓	____	✓	____	____
3.	F003	____	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	____	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

Methylene Chloride

N/A B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

N/A.c. **First Third Wastes**

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	____	____	____	____	____
F007	____	____	____	____	____
F008	____	____	____	____	____
F009	____	____	____	____	____
F019	____	____	____	____	____
K001*	____	____	____	____	____
K004*	____	____	____	____	____
K008*	____	____	____	____	____
K011	____	____	____	____	____
K013	____	____	____	____	____
K014	____	____	____	____	____
K015*	____	____	____	____	____
K016*	____	____	____	____	____
K017	____	____	____	____	____
K018*	____	____	____	____	____
K019*	____	____	____	____	____
K020*	____	____	____	____	____
K021*	____	____	____	____	____
K022*	____	____	____	____	____
K024*	____	____	____	____	____
K025*	____	____	____	____	____
K030*	____	____	____	____	____
K031	____	____	____	____	____
K035	____	____	____	____	____
K036*	____	____	____	____	____
K037*	____	____	____	____	____
K044*	____	____	____	____	____
K045*	____	____	____	____	____
K046*	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
K047*	____	____	____	____	____
K048*	____	____	____	____	____
K049*	____	____	____	____	____
K050*	____	____	____	____	____
K051*	____	____	____	____	____
K052*	____	____	____	____	____
K060*	____	____	____	____	____
K061*	____	____	____	____	____
K062*	____	____	____	____	____
K069*	____	____	____	____	____
K071*	____	____	____	____	____
K073*	____	____	____	____	____
K083*	____	____	____	____	____
K084	____	____	____	____	____
K085	____	____	____	____	____
K086*	____	____	____	____	____
K087*	____	____	____	____	____
K099*	____	____	____	____	____
K100*	____	____	____	____	____
K101*	____	____	____	____	____
K102*	____	____	____	____	____
K103*	____	____	____	____	____
K104*	____	____	____	____	____
K106*	____	____	____	____	____
P001	____	____	____	____	____
P004	____	____	____	____	____
P005	____	____	____	____	____
P010	____	____	____	____	____
P011	____	____	____	____	____
P012	____	____	____	____	____
P015	____	____	____	____	____
P016	____	____	____	____	____
P018	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
P020	____	____	____	____	____
P030	____	____	____	____	____
P036	____	____	____	____	____
P037	____	____	____	____	____
P039	____	____	____	____	____
P041	____	____	____	____	____
P048	____	____	____	____	____
P050	____	____	____	____	____
P058	____	____	____	____	____
P059	____	____	____	____	____
P063	____	____	____	____	____
P068	____	____	____	____	____
P069	____	____	____	____	____
P070	____	____	____	____	____
P071	____	____	____	____	____
P081	____	____	____	____	____
P082	____	____	____	____	____
P084	____	____	____	____	____
P087	____	____	____	____	____
P089	____	____	____	____	____
P092	____	____	____	____	____
P094	____	____	____	____	____
P097	____	____	____	____	____
P102	____	____	____	____	____
P105	____	____	____	____	____
P108	____	____	____	____	____
P110	____	____	____	____	____
P115	____	____	____	____	____
P120	____	____	____	____	____
P122	____	____	____	____	____
P123	____	____	____	____	____
U007	____	____	____	____	____
U009	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
U010	____	____	____	____	____
U012	____	____	____	____	____
U016	____	____	____	____	____
U018	____	____	____	____	____
U019	____	____	____	____	____
U022	____	____	____	____	____
U029	____	____	____	____	____
U031	____	____	____	____	____
U036	____	____	____	____	____
U037	____	____	____	____	____
U041	____	____	____	____	____
U043	____	____	____	____	____
U044	____	____	____	____	____
U046	____	____	____	____	____
U050	____	____	____	____	____
U051	____	____	____	____	____
U053	____	____	____	____	____
U061	____	____	____	____	____
U063	____	____	____	____	____
U064	____	____	____	____	____
U066	____	____	____	____	____
U067	____	____	____	____	____
U074	____	____	____	____	____
U077	____	____	____	____	____
U078	____	____	____	____	____
U086	____	____	____	____	____
U089	____	____	____	____	____
U103	____	____	____	____	____
U105	____	____	____	____	____
U108	____	____	____	____	____
U115	____	____	____	____	____
U122	____	____	____	____	____
U124	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
U129	____	____	____	____	____
U130	____	____	____	____	____
U133	____	____	____	____	____
U134	____	____	____	____	____
U137	____	____	____	____	____
U151	____	____	____	____	____
U154	____	____	____	____	____
U155	____	____	____	____	____
U157	____	____	____	____	____
U158	____	____	____	____	____
U159	____	____	____	____	____
U171	____	____	____	____	____
U177	____	____	____	____	____
U180	____	____	____	____	____
U185	____	____	____	____	____
U188	____	____	____	____	____
U192	____	____	____	____	____
U200	____	____	____	____	____
U209	____	____	____	____	____
U210	____	____	____	____	____
U211	____	____	____	____	____
U219	____	____	____	____	____
U220	____	____	____	____	____
U221	____	____	____	____	____
U223	____	____	____	____	____
U226	____	____	____	____	____
U227	____	____	____	____	____
U228	____	____	____	____	____
U237	____	____	____	____	____
U238	____	____	____	____	____
U248	____	____	____	____	____
U249	____	____	____	____	____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. <u>BDAT Treatability Group - Treatment Standards Identification</u>

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% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   ✓ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   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 or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

_____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
_____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater

B. <u>Waste Analysis</u>

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

✓ Yes _____ No _____ NA

How was this determination made?

- Knowledge of waste

✓ Yes _____No

If yes, is any supporting data available for review? Describe how this is adequate._____

_____

- TCLP

_____ Yes _____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

_____

_____

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

✓ Yes ____ No ____ NA

If yes, specify the waste stream: Waste Methylene Chloride

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?
Any proposed new system will be laboratory checked prior to full scale use. However, this is not anticipated.

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ____ NA

If yes, is any supporting data available for review? Describe how this is adequate._____

_____

_____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

_____

_____

_____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate._____

_____

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

____ Yes ____ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

_____

_____

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

d. How does the generator test the waste when a process or waste stream changes?

_____

_____

_____

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

✓ Yes ____ No

However, please note facility, though TSD w/ part A, never stored longer than 90 days and is undergoing closure.

If yes, the TSD Checklist must be completed.

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

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

✓ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	✓ Yes	____ No
Applicable treatment standards	✓ Yes	____ No
Manifest number	✓ Yes	____ No
Waste analysis data, if available	✓ Yes	____ No

Identify off-site treatment or storage facilities: Safety Kleen, Hebron, Ohio

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No N/A

f. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes ✓ No ____ NA

h. 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

i. If yes, 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

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

✓ Yes _____ No

N/A D. <u>Demonstration and Certification -- "Soft Hammer" Wastes</u>

a. 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

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	_____ Yes	_____ No
Addresses	_____ Yes	_____ No
Telephone Numbers	_____ Yes	_____ No
Contact dates	_____ Yes	_____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

_____ Yes _____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

_____

_____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i)	EPA Hazardous waste number	_____ Yes	_____ No
(ii)	Manifest number	_____ Yes	_____ No
(iii)	Waste analysis data, if available	_____ Yes	_____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

N/A E. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u>
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____No

If yes, list types of waste treatment units and processes:

_____

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ✓ Yes ____ No ____ NA

   o California List ____ Yes ____ No ____ NA

   o First Third ____ Yes ____ No ____ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ✓ Yes ____ No

   Safety Kleen periodically tests waste

   a. What date was the waste analysis plan last revised? '89

   b. Are analyses conducted on-site or off-site?

   ____ On-site ✓ Off-site

   Identify off-site lab: Safety Kleen

   c. Is F-solvent waste analyzed using TCLP?

   ✓ Yes ____ No ____ NA

   ~~d.~~ Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

   ____ Yes ____ No ____ NA

   Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: ____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

✓ Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

✓ Yes ____ No

However, please note, facility, Though TSD of Part A never stored longer than 90 days and is undergoing closure.

If no, go to C, Treatment.

2. If yes, check the appropriate method.

✓ Tanks
✓ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

✓ Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

✓ Yes ____ No

5. Do operating records agree with container labeling?

✓ Yes ____ No ____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

✓ Yes ____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ✓ No ____ NA

Wastes stored less than 90 days

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

8. 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 more than the tank volume?

____ Yes ____ No

9. 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?

____ Yes ____ No ____ NA

N/A c. **Treatment**

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: American Cyanamid Company
Address: P.O. Box 148 12600 Pickel Rd.
Perrysburg, Ohio 43551
County: Wood
Facility Contact: John DeMarco - Plant Manager

Inspector(s) Name(s): Don North - NWDO

Date of Inspection 11-14-89
HWFB #: 03-87-0383
USEPA ID #: OHD 005044128
Facility Phone #: (419) 874-7941
Facility Contact Phone #:
Safety Equipment #:

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?	Y	(1)
c. Inherently waste-like? (F020, F021, F022, F023, F026, F028)?	N	
3. If recycled or accumulated, treated or stored before recycling, is the waste:		
a. Used in a manner constituting disposal?	N	
b. Burned for energy recovery?	Y	(2)
c. Reclaimed? (Refer to Table 1 of 3745-51-02)	Y	(1)
d. Accumulated speculatively?	N	
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?	N	
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?		

(1) Methylene chloride is recycled by Safety + Klean
(2) Waste flammable liquid (both trade streams) burned Retro Chem

	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?	Y	(1)
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	Y	
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?	Y	
10. Has the facility submitted a Part B?	N	(2)
11. Was advance notice of the inspection given? If so, how far in advance?	Y	5 days

(1) Part A submitted 11-5-1980

(2) American Cyanamid has elected to close its hazardous waste storage facilities. The closure plan was approved Nov 16, 1989. Facility no longer stores H.W. longer than 90 days.

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

American Cyanamid manufactures alkyd and polyester molding compounds and electrocoating resins. Used for electrical household circuit breakers and automotive distributor caps.

There are 2 drum storage areas, both indoors on concrete floor. These areas originally designated for longer than 90 day storage. A closure plan has been approved Nov 16, 1989 and drum storage areas are now used for less than 90 day storage.

See attached list of possible wastes at company. A.C. is planning to greatly reduce + eliminate amt. of Four Methylene Chloride needed. Instead they will use a surfactant in a heated tank.

ATTACHMENT IV

HAZARDOUS WASTE INVENTORY

Description	Waste No.	Total Inventory *
Waste Methylene Chloride (Dichloromethane) Used for cleaning mixers Want to reduce + remove use from plt. Replace w/ surfactant in heated tank → prod. small amt. N-H sludge	F002 LDR	475,200 Lbs. 10 dr/mo
Waste Flammable Liquid (Propylene Glycol Methyl Ether, plus 2-Propoxy Ethanol, plus Styrene, plus n-Butanol, plus Butyl Acrylate) line flush 2X/mo 10 gal/flush use liquid 2X then dispose	D001	1,100 Gallons 2 dr/yr
Waste Flammable Liquid (Alkyd Resin Distillate Layer)	D001	1,100 Gallons 2 dr/yr
~~Waste Flammable Liquid (Ethylene Glycol Monoethyl Ether)~~	~~D001~~	~~2,850 Gallons~~
Waste Styrene Resin (Polyester Resin with Free Styrene)	D001	1,330 Gallons ~1-2 dr/yr not usual waste
Waste Vinyl Toluene Resin (Polyester Resin with Free Vinyl Toluene)	D001	210 Gallons ~1-2 dr/yr not usual waste
~~Waste Methyl Methacrylate~~	~~D001~~	~~150 Gallons~~
~~Waste Toluene~~	~~F005~~	~~50 Gallons~~

*Total amounts for all years.

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))?	N	
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N	
5. 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 using the most recently revised USEPA form 8700-22?	Y	
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)?	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) (262.20)?	Y	
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?	Y	
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?	N/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)?	Y	

	Y/N/NA	REMARK #
6. Does the generator meet the following hazardous waste pre-transport requirements:	Y	
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)?	Y	
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)?	Y	
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)?	Y	
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)?	N/A	
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:		(1)
a. The containers or tanks are clearly marked with the words "Hazardous Waste"?	Y	
b. The date that accumulation began is clearly marked on each container?	Y	
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.	✓	

(1) Please note: though facility has not yet completed closure storage is not for greater than 90 days. Therefore, this portion of the checklist was completed.

	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?	N	(2)
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)?	N	

(2) Waste was never stored longer than 90 days. Closure plan has been submitted to Ohio EPA

		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)	Y	(3)
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)	Y	
14.	Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	Y	
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

(3) Use Protecting the Environment It's Everybodys Business. Annual refresher conducted on May 24, 25, 1989.

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))?	Y	
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))	Y	
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))	N	
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	Y	

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	Y	(1)
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))	Y	(2)
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))	Y	
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)	Y	

(1) Run 24 hrs/day - 5 days; security system 23 detects intruder, smoke,
(2) Storage areas located inside plant

	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))	Y	
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))	Y	
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))	Y	
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.	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.	Y	
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?	N/A	
3.	It 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?	Y	
	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	(1)

(1) Local fire dept does annual inspection and training at plant. Local fire and police get annual copy of contingency plan.

	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):		
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)] (265.52(f))?	Y	
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)	Y	
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)	Y	(1)
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	

(1) Revised annually - latest October '89

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:		
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).	Y	
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	Y	
c.	The estimated (or actual) weight, volume or density of the waste material?	Y	
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 1, Table 2)	Y	
e.	The present physical location of each hazardous waste within the facility?	Y	
f.	Records of incidents which require implementation of the Contingency Plan?	Y	
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))	N/A	
h.	Records of any waste analyses and trial tests required to be performed?	Y	
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	Y	
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))?	N/A	

	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)?	N/A	
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)?	Y	
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)	N/A	
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)?	Y	(1)
	a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.		
	b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).		
	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)] (265.112(C))	N/A	
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))	N/A	
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	

(1) The facility's closure plan was approved on November 16, 1989. Closure will begin soon and OEPA will be notified of each step and welcomed to observe.

	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/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)] (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/A	
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?		
b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)		

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] Yes	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))	N/A	

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 3745-66-9/(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.	N	
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.	Y	8
	b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989.	N/A	
	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.	Y	
	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	

	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)) — Y

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. — Y
   b. Placed on a foundation or base capable of providing support. — Y
   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. — Y
   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)) — Y

   a. External Liner

      1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank? — Y
      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

	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

	Y/N/NA	REMARK #
1. Is the vault system designed and operated to contain 100% of the capacity of the largest tank?	N/A	Solids Dewatering Sump.
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?	N/A	
3. Are chemically resistant water stops in place at all joints?	N/A	
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?	N/A	
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?	N/A	
6. Is the vault system provided with an exterior moisture barrier?	N/A	

c. Doubled-Walled Tank

	Y/N/NA	REMARK #
1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?	Y	
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Y	
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	

	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)?	N/A	1
a. If no, is ancillary equipment inspected daily for leaks? [3745-66-93(F)] (265.193(f))	Y	
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))	N/A	
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 other than 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)):	N/A	
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))	N/A	
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))	N/A	

1. No Underground Tanks, All Above Ground Tanks Inspected Daily

	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))	N/A	
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	Y	
b. The characteristics of hazardous waste to be stored or treated	Y	
c. Corrosion protection for tank systems in contact with soil or water	Y	
d. Protection from vehicular traffic for underground tanks	N/A	
e. Adequacy of tank foundation, proper anchoring and effects of frost heave	Y	
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))	Y	
b. Proper backfilling; [3745-66-92(C)] (265.192(c))	Y	
c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))	Y	
d. Proper support and protection of ancillary equipment; [3745-66-92(E)] (265.192(e))	Y	
e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))	Y	

	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))	N/A	
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))	N/A	
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.	Y	
b. The o/o uses appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)	Y	
c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred.	N/A	
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).	Y	
b. Above ground portion of the tank (daily).	Y	
c. Data from leak detection equipment (daily).	Y	
d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily).	Y	

	Y/N/NA	REMARK #
e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.	N/A	
f. All sources of impressed current at least bi-monthly.	N/A	
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	N/A	
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.	N/A	
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.	N/A	
d. If a through e have not been satisfied, has the tank been closed in accordance with OAC 3745-66-97?	N/A	
e. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).	N/A	
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)?	N/A	
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	N/A	
b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or	N/A	
c. The tank is used solely for emergencies.	N/A	
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))	N/A	

	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)?	N/A	
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.	N/A	
b. Obtained written documentation on similar waste under similar operating conditions.		

21 APR 1989

5HR-12

Arthur M. Gustafson, Plant Manager
American Cyananid Company
12600 Eckel Road
Perrysburg, Ohio 43551

Re: Compliance Letter
American Cyanamid Company
OHD 005 044 128

Dear Mr. Gustafson:

On November 10, 1988, the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986. Regulations are set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, and 270. A copy of the inspection report is enclosed for your records.

As a result of the inspection, it appears that the subject facility is in compliance with the land disposal requirements found at 40 CFR Part 268.

If you have any questions regarding this correspondence, please contact me at (312) 886-4454.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Janet Leite, OEPA, NW District Office

5HR-12:S.SWANSON:sm:6-8093:DISK #1:PC FILENAME: GUSTAFSO

S.M. 4/18/89

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT.		SCS	
DATE		4-21-89	

CMEK, 75, 255, 20

OhioEPA
e of Ohio Environmental Protection Agency

..rthwest District Office
1035 Devlac Grove Dr.
Bowling Green, Ohio 43402
(419) 352-8461

RECEIVED
OHIO EPA

NOV 2 3 1988

DIV. of SOLID & HAZ. WASTE MGT.

Richard F. Celeste
Governor

Re: Wood County
American Cyanamid
OHD005044128 /03-87-0383
Hazardous Waste

November 17, 1988

Mr. Arthur M. Gustafson, Plant Manager
American Cyanamid Company
P.O. Box 148
Perrysburg, OH 43551

Dear Mr. Gustafson:

An interim status inspection was conducted at American Cyanamid in your presence on November 10, 1988. The purpose of this inspection is to assess compliance with state and federal regulations applicable to a treatment, storage and disposal facility of hazardous waste. No violations of state and federal law were noted at the time of the inspection.

You are hereby advised that total compliance with the regulations contained in the Hazardous Waste Rules of the State of Ohio and U.S. EPA is required as a condition of continuing interim status.

The following suggestions are recommended for improved operation:

1. Keep signed copies of all employee Personnel Training forms in one file folder.

2. On page 18 of the facility's contingency plan under "Release of Hazardous Substances", the phrase "if their help is needed" should be deleted. It should be revised to state that the NWDO should be notified of any release of a hazardous substance regardless of the severity.

3. The evacuation procedures in the contingency plan should also be revised and updated and should include a sketch of escape routes. Please send me a copy of the plan once the above mentioned revisions are completed.

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

November 10, 1988 9:00am
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 03-87-0383

U.S. EPA I.D. # OHD 005 044 128

GENERAL INFORMATION

Facility: American Exponential Co. Address: P.O. Box 148 12600 Eckel Rd. City: Perrysburg

State: Ohio Zip Code: 43551 County: Wood Telephone: (419) 874-7941

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Arthur M. Gustafson	Plant Manager	(419) 874-7941
2.			
3.			

INSPECTOR(S)

1.	Janet Leite	District Environmental Engineer	(419) 352-8461
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- [ ] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [x] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- [x] General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- [x] Containers S01
- [ ] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	✓			
2. If "yes", is it complete and accurate?	✓			
3. Has the facility submitted a Part B?		✓		

4. Was advance notice of the inspection given? If so, how far in advance?

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

American Cyanamid has submitted a closure plan for their container storage to Ohio EPA. They will not be applying for a Part B permit.

Revised 12/84

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	✓			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?		✓		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]		✓		
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	✓			
b) 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 Section 262.20 [3745-52-20(B)(C)(D)].	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	✓			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	✓			

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	X			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	X			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	X			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]			X	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	X			
b) The date that accumulation began is clearly marked on each container.	X			
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [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. (Section 262.34) [3745-52-34(A)(4)]	X			
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	X			

Revised 12/84

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Record/Reporting
G: Closure
H: Financial Requirements
I: Management of Containers
J: Management of Tanks
K: Surface Impoundments
L: Waste Piles
M: Land Treatment
N: Landfills
O: Incinerators
P: Thermal Treatment
Q: Chemical/Physical/Biological Treatment

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has 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 Section 265.13(a) [3745-65-13(A)(1)]	✓			
2. The operator has 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. (Section 265.13(b)) [3745-65-13(B)]	✓			
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	✓			
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	✓			

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
4. The facility has -	✓			
a) A 24-hour surveillance system, or				
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	✓			
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]	✓			
6. a) The operator has 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. (265.15) [3745-65-15]	✓			
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	✓			
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(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. [3745-65-16(A)(B)(C)]	✓			
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	✓			

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	✓			
b) Physical separation of incompatible waste materials.	✓			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]			✓	no comingling of wastes
Subpart C: Preparedness and Prevention				
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	✓			

Revised 12/84

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	X			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	X			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]			X	no proposals declined

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	X			
b) Arrangements or agreements with local or state emergency authorities.	X			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	X			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	X			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	X			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]	X			

Revised 12/84

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]	X			updated yearly
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	X			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)			X	no emergency situation has ever occured

Subpart E: Manifests/Records/Reporting

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

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

	Yes	No	N/A	Remark #
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]	X			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	X			
c) The estimated (or actual) weight, volume or density of the waste material(s).	X			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	X			
e) The present physical location of each hazardous waste within the facility.	X			
f) 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 number(s). (265.73(b)(2)) [3745-65-73(B)(2)]			X	

Revised 12/84

	Yes	No	N/A	Remark #
g) Records of any waste analyses and trial tests required to be performed.	✓			
h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).	✓			
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]	✓			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	✓			
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	✓			

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

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)			✓	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]			✓	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]			✓	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]			✓	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]			✓	

Revised 12/84

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]	✓			
a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]	✓			
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a schedule for the various phases of closure.	✓			
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]	✓			
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]	✓			

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:	X			
a) Closed (265.173) [3745-66-73(A)]	X			
b) In good physical condition (265.171) [3745-66-71]	X			
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	X			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	X			
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	X			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	X			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	X			
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	X			

Revised 12/04

RCRA INTERIM STATUS INSPECTION FORM

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]	✓			
a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]	✓			
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a schedule for the various phases of closure.	✓			
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]	✓			
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]			✓	

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	✓			

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

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)	✓			
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]			✓	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	✓			
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	✓			
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]			✓	

RCRA INTERIM STATUS INSPECTION FORM

Subpart E: Manifests/Records/Reporting

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

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

	Yes	No	N/A	Remark #
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓			
e) The present physical location of each hazardous waste within the facility.	✓			
f) 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 number(s). (265.73(b)(2)) [3745-65-73(B)(2)]			X	
g) Records of any waste analyses and trial tests required to be performed.	✓			
h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).		✓		#7
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]	✓			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	✓			

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:				
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.		✓		#4
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(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	✓			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]		✓		#5
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]		✓		#7
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)]			✓	

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	✓			
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	✓			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]			✓	

	Yes	No	N/A	Remark #
6. a) The operator has 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. (265.15) [3745-65-15]		✓		#3
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]		✓		#5
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(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. [3745-65-16(A)(B)(C)]		✓		#1
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]		✓		#3
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	✓			
b) Physical separation of incompatible waste materials.	✓			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	✓			

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

	Yes	No	N/A	Remark #
Subpart B: General Facility Standards				
1. The operator has 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 Section 265.13(a) [3745-65-13(A)(1)]	✓			
2. The operator has 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. (Section 265.13(b)) [3745-65-13(B)]	✓			
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	✓			
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	✓			
IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or	✓			
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	✓			
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]	✓			

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

#1 The facility [illegible] training for supervisors.

#2 The facility did not [illegible] or descriptions for [illegible]

#3 The facility did [illegible] EAF baghouses.

#4 The [illegible] Needs to be updated.

#5 A [illegible] found at the Fairchild facility.

#6 The facility did not have the correct closure cost estimate.

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]			✓	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	✓			
b) The date that accumulation began is clearly marked on each container.	✓			
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [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. (Section 262.34) [3745-52-34(A)(4)]		✓		#1
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].		✓		#2

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	✓			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?		✓		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]		✓		
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	✓			
b) 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 Section 262.20 [3745-52-20(B)(C)(D)].	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	✓			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	✓			

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	X			
2. If "yes", is it complete and accurate?				
3. Has the facility submitted a Part B?		X		
4. Was advance notice of the inspection given? If so, how far in advance?	X			1 week

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Timken is a steel producer, therefore they generate EAF dust (K061) and Pickle liquor (K062), solvent (F001, F003, F005). Also they accept pickle liquor from their Wooster facility and it is treated and discharged in to a delisted surface impoundment.

KG 304 11/7/88 9:00am
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # [illegible]

GENERAL INFORMATION

U.S. EPA I.D. # OHD [illegible]

Facility: Timken Address: 1835 Dueber Avenue SW City: Canton

State: Ohio Zip Code: _____ County: Stark Telephone: _____

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Bill LaCore	Environmental Control Coordinator	
2.	George McCormick		
3.			

INSPECTOR(S)

1.	Tracy Sabol	EFI	216-425-9171
2.	Paul Anderson	"	216-425-9171
3.			

INSTALLATION ACTIVITY

Mark One

- [ ] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [x] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- [x] General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- [x] Containers S01
- [x] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	✓			
b) In good physical condition (265.171) [3745-66-71]	✓			
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	✓			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	✓			
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	✓			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	✓			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	✓			
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	✓			

RCRA INTERIM STATUS INSPECTION FORM

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]				
a) A closure trust fund, or		X		
b) A surety bond, or		X		
c) A closure letter of credit, or		X		
d) A combination of financial mechanisms.	✓			Financial [illegible]
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?		✓		#5
3. When was the most recent estimate made?				Jan 87
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?			X	
5. When was the most recent estimate made?			X	

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	**F-Solvent Wastes**					
1.	F001	___	___	___	___	___
2.	F002	X	___	___	___	___
3.	F003	X	___	___	___	___
4.	F004	___	___	___	___	___
5.	F005	X	___	___	___	___

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified N/A

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	___	___	___	___	___
Cadmium	100 mg/L	___	___	___	___	___
Chromium VI	500 mg/L	___	___	___	___	___
Lead	500 mg/L	___	___	___	___	___
Mercury	20 mg/L	___	___	___	___	___
Nickel	134 mg/L	___	___	___	___	___
Selenium	100 mg/L	___	___	___	___	___
Thallium	130 mg/L	___	___	___	___	___

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L N/A

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 N/A

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to N/A

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ✓ NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L N/A

____	____	____	____	____

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. <u>BDAT Treatability Group - Treatment Standards Identification</u>

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% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   X All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   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 X 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 or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No X NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

✓ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

✓ Yes ____ No

If yes, note how this is adequate: [illegible]

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

X Yes ____ No ____ NA

If yes, specify the waste stream: [illegible]

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes X No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

Knowledge

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No X NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ___X___ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ___X___ NA

If yes, note how this is adequate: _____

- Testing

____ Yes ____ No ___X___ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

____ Yes ____ No ___X___ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ___X___ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

____ Yes X No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

X Yes ____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

X Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	X Yes	____ No
Applicable treatment standards	X Yes	____ No
Manifest number	X Yes	____ No
Waste analysis data, if available	X Yes	____ No

Identify off-site treatment or storage facilities: [illegible]

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes X No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]? N/A

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No ✓ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes X No

If yes, list types of waste treatment units and processes:

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: American Diamond Company

U.S. EPA I.D. No.: OHD 005 044123

Street: 12601 Eckel Rd. P.O. Box 148

City: Perrysburg **State:** Ohio **Zip Code:** 43551

Telephone: (419) 874-7941

Operator: _____

Street: _____

City: _____ **State:** _____ **Zip Code:** _____

Telephone: _____

Owner: _____

Street: _____

City: _____ **State:** _____ **Zip Code:** _____

Telephone: _____

Inspection Date: 11/10/88 **Time:** 9:00 - 12:00 **Weather Conditions:** _____

	Name	Affiliation	Telephone
Inspectors:	Janet Leite	OHIO EPA	(419) 352-8461

Facility Representatives: Arthur N. Bretsfson Plant Manager

	RCRA Status	LDR Status F-Solvent	LDR Status California List
Generator	X	X	
Transporter			
Treater			
Storer	X	X	
Disposer			

Revised 11-03-87

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	**F-Solvent Wastes**					
1.	F001	____	____	____	____	____
2.	F002	X	____	X	____	____
3.	F003	____	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	____	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

____	____	____	____	____

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT 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% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   ✓ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   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 or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

X Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

X Yes ____ No

If yes, note how this is adequate: waste methylene chloride from mixer/tank clean-up

- TCLP

____ Yes X No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

_____

_____

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

____ Yes ____ No ____ NA

If yes, specify the waste stream: _____

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

_____

_____

_____

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

  ____ Yes ____ No ____ NA

  If yes, note how this is adequate: _____

- Testing

  ____ Yes ____ No ____ NA

  If yes, list test method used: _____

d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

____ Yes ____ No ____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

__✓__ Yes ____ No

If yes, the TSD Checklist must be completed.

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 yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

__✓__ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	__✓__ Yes	____ No
Applicable treatment standards	__✓__ Yes	____ No
Manifest number	__✓__ Yes	____ No
Waste analysis data, if available	__✓__ Yes	____ No

Identify off-site treatment or storage facilities: Safety-Kleen Hudson & Safety-Kleen New Castle Co. (currently).

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes __✓__ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No X NA

D. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u>
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes ____ No

If yes, list types of waste treatment units and processes:

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS N/A

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

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 [264.13 or 265.13]?

   o F-solvent ____ Yes ____ No X NA

   o California List ____ Yes ____ No X NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ____ Yes X No

   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: _____

   c. Is F-solvent waste analyzed using TCLP?

   ____ Yes ____ No ____ NA

   d. Describe the frequency of sampling: _____

   e. Describe procedures used to identify manifest discrepancies: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

   X Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

   X Yes ____ No

   If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

   ____ Tanks
   X Containers 55 gallon drums

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

   X Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

   X Yes ____ No

5. Do operating records agree with container labeling?

   X Yes ____ No ____ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

   ____ Yes X No ____ NA

   If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

   ____ Yes ____ No

   If yes, state how: ____

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No X NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

8. 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?

____ Yes ____ No X NA

_____
_____
_____

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes X No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

_____
_____
_____

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

____ Yes ____ No

4. Describe frequency of testing treatment residuals:

_____
_____
_____

5. Is dilution used as a substitute for treatment?

____ Yes ____ No

6. Are notifications prepared by the generators kept in the facility's operating record?

____ Yes ____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

____ Yes ____ No ____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets the treatment standards	____ Yes	____ No

Identify off-site disposal facilities: _____

_____

_____

D. <u>Treatment in Surface Impoundments</u>

1. Are restricted wastes placed in surface impoundments for treatment?

____ Yes ___X___ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No

4. 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.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes X No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

_____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

_____ 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 restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

   _____ Yes _____ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

   _____ Yes _____ No

   If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

   _____ Yes _____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

   _____ Yes _____ No _____ NA

7. What is the volume of the restricted wastes disposed of to date?

   _____

   _____

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

   _____ Yes _____ No _____ NA

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	____Yes	____No
trichloroethylene	____Yes	____No
methylene chloride	____Yes	____No
1,1,1-trichloroethane	____Yes	____No
carbon tetrachloride	____Yes	____No
chlorinated fluorocarbons	____Yes	____No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	____Yes	____No
trichloroethylene	____Yes	____No
methylene chloride	____Yes	____No
1,1,1-trichloroethane	____Yes	____No
chlorobenzene	____Yes	____No
trichlorofluoromethane	____Yes	____No
1,1,2-trichloro-1,2,2-trifluoroethane	____Yes	____No
ortho-dichlorobenzene	____Yes	____No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	____Yes	____No
acetone	____Yes	____No
ethyl acetate	____Yes	____No
ethyl benzene	____Yes	____No
ethyl ether	____Yes	____No
methyl isobutyl ketone	____Yes	____No
n-butyl alcohol	____Yes	____No
cyclohexanone	____Yes	____No
methanol	____Yes	____No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ____Yes ____No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	____Yes	____No
nitrobenzene	____Yes	____No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	____Yes	____No
methyl ethyl ketone	____Yes	____No
carbon disulfide	____Yes	____No
isobutanol	____Yes	____No
pyridine	____Yes	____No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?
____Yes ____No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?
____Yes ____No

If yes, list the constituents.

_____

_____

(c) Are the constituents used as diluents?
____Yes ____No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?
____Yes ____No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?
____Yes ____No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?
____Yes ____No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ____Yes ____No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of <u>all</u> the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
68%	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains <u>only</u> F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L) WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cycohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)

SEP 22 1988

5HR-12

Mr. Arthur Gustafson
American Cyanamid
Post Office Box 148
Perrysburg, Ohio 43551

Re: Compliance Letter
American Cyanamid
OHD 005 044 128

Dear Mr. Gustafson:

On March 14, 1988, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986. Regulations are set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265 and 270. A copy of the inspection report is enclosed for your records.

As a result of the inspection, it appears that the subject facility is in compliance with the land disposal requirements found at 40 CFR Part 268.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Ms. Ann Budich of my staff at (312) 353-6844.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Richard Dreschel, NWDO

bcc: Sally Swanson, REB

5HR-12:RCRA:A.BUDICH:lt:9/14/88:DISK #2 FORM

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	ENF. PROG. SECTION	SECTION CHIEF	O.R. A.D.D.	WMD DIR
INIT.	AA	ab					SKS		
DATE	9-22-88	9-20-88					9-22-88		

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: American Cyanamid

U.S. EPA I.D. No.: OHD005044128

Street: Eckel Rd

City: Perrysburg State: Ohio Zip Code: 43551

Telephone: (419) 874-7941

Operator:

Street:

City: State: Zip Code:

Telephone:

Owner:

Street:

City: State: Zip Code:

Telephone:

Inspection Date: 3/14/88 Time: 8:30 - 12:00 Weather Conditions: Mild

	Name	Affiliation	Telephone
Inspectors:	Richard Drescher	OEPA	(419) 352-8461
Facility Representatives:	Arthur Gustafson	Plant Mgr.	

	RCRA Status	LDR Status F-Solvent	LDR Status California List
Generator	X	X	
Transporter			
Treater			
Storer	X	X	
Disposer			

Revised 11-03-87

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	___	___	___	___	___
2.	F002	X	___	X	___	___
3.	F003	___	___	___	___	___
4.	F004	___	___	___	___	___
5.	F005	___	___	___	___	___

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	___	___	___	___	___
Cadmium	100 mg/L	___	___	___	___	___
Chromium VI	500 mg/L	___	___	___	___	___
Lead	500 mg/L	___	___	___	___	___
Mercury	20 mg/L	___	___	___	___	___
Nickel	134 mg/L	___	___	___	___	___
Selenium	100 mg/L	___	___	___	___	___
Thallium	130 mg/L	___	___	___	___	___

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

____	____	____	____	____

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   X Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   X All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   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 or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

_X_ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

_X_ Yes ____ No

If yes, note how this is adequate: Methylene Chloride from Mixer Cleanout.

- TCLP

____ Yes _X_ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

____ Yes ____ No ____ NA

If yes, specify the waste stream: _____

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

  ____ Yes ____ No ____ NA

  If yes, note how this is adequate: _____

- Testing

  ____ Yes ____ No ____ NA

  If yes, list test method used: _____

d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

____ Yes ____ No ____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

_X_ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

_X_ Yes ____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

_X_ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_X_ Yes	____ No
Applicable treatment standards	_X_ Yes	____ No
Manifest number	_X_ Yes	____ No
Waste analysis data, if available	_X_ Yes	____ No

Identify off-site treatment or storage facilities: Safety-Kleen Hebron

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes _X_ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No X NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes ____ No

If yes, list types of waste treatment units and processes:

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS N/A

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

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 [264.13 or 265.13]?

   o F-solvent ____ Yes ____ No _X_ NA

   o California List ____ Yes ____ No _X_ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ____ Yes _X_ No

   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: _____

   c. Is F-solvent waste analyzed using TCLP?

   ____ Yes ____ No ____ NA

   d. Describe the frequency of sampling: _____

   e. Describe procedures used to identify manifest discrepancies: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

   _X_ Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

X Yes ____ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

____ Tanks
X Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

X Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

X Yes ____ No

5. Do operating records agree with container labeling?

X Yes ____ No ____ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes X No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: ____

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No X NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

8. 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?

____ Yes ____ No X NA

_____
_____
_____

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes X No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

_____
_____
_____

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

____ Yes ____ No

4. Describe frequency of testing treatment residuals:

_____
_____
_____

5. Is dilution used as a substitute for treatment?

____ Yes ____ No

6. Are notifications prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

_____

_____

D. <u>Treatment in Surface Impoundments</u>

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes X No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No

4. 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.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. <u>Land Disposal</u>

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes X No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

_____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

_____ 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 restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

_____ Yes _____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

7. What is the volume of the restricted wastes disposed of to date?

_____

_____

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	____Yes	____No
trichloroethylene	____Yes	____No
methylene chloride	____Yes	____No
1,1,1-trichloroethane	____Yes	____No
carbon tetrachloride	____Yes	____No
chlorinated fluorocarbons	____Yes	____No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	____Yes	____No
trichloroethylene	____Yes	____No
methylene chloride	____Yes	____No
1,1,1-trichloroethane	____Yes	____No
chlorobenzene	____Yes	____No
trichlorofluoromethane	____Yes	____No
1,1,2-trichloro-1,2,2-trifluoroethane	____Yes	____No
ortho-dichlorobenzene	____Yes	____No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	____Yes	____No
acetone	____Yes	____No
ethyl acetate	____Yes	____No
ethyl benzene	____Yes	____No
ethyl ether	____Yes	____No
methyl isobutyl ketone	____Yes	____No
n-butyl alcohol	____Yes	____No
cyclohexanone	____Yes	____No
methanol	____Yes	____No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ____Yes ____No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	____Yes	____No
nitrobenzene	____Yes	____No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	____Yes	____No
methyl ethyl ketone	____Yes	____No
carbon disulfide	____Yes	____No
isobutanol	____Yes	____No
pyridine	____Yes	____No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?
____Yes ____No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?
____Yes ____No

If yes, list the constituents.

_____

_____

(c) Are the constituents used as diluents?
____Yes ____No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?
____Yes ____No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?

____Yes ____No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?

____Yes ____No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ____Yes ____No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
68%	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

CYANAMID

in compliance

American Cyanamid Company
P.O. Box 148
Perrysburg, OH 43551
(419) 874-7941

OHD005044128 G, TSD, PA

May 10, 1983

RECEIVED
MAY 17 1983
WASTE MANAGEMENT BRANCH
EPA REGION V

Ms. Kate Wilson
Ohio EPA - Northwest District Office
1035 Devlac Grove Drive
Bowling Green, Ohio 43402-4598

Dear Ms. Wilson:

This is in response to your letter of April 11, 1983 in which you noted certain problem areas resulting from your inspection conducted on April 8, 1983.

Please be advised that the following action has been taken in regards to each of the areas you pointed out in your letter.

PART 4 (D) (1) (e)

A list of all emergency equipment with locations, primarily fire extinguishers, has been included in the Contingency Plan. Discussion of their use was previously included in the plan. Please see attached copies for details including letters of transmittal to our local authorities.

PART 4 (E) (1) (a-e)

Our previous record has been revised as per attached copy to include the EPA Hazardous Waste Identification Number, physical state of the waste, estimated amount of waste, EPA Handling Code and physical locations of wastes.

PART 4 (G) (1) (a,e)

Our Closure Plan has been revised and an expected date of closure has been included. Please see attached.

PART 5 (I) (1)&(2)&(4)

Instructions have been issued that all waste drums must be closed except when adding to or removing wastes from the drums. In addition our inspection record has been revised as per attached so that it is documented weekly that all locations have been inspected.

RECEIVED 5/17/83

PART 5 (I) (5)

We have decided to adopt your suggestion regarding affixing the hazardous waste labels to the drums of waste in storage as opposed to our former practice of stenciling the drums. This should make easier identification possible.

We trust the above meets with your approval but if there should be any questions please advise.

Very truly yours,

Arthur M. Gustafson

Arthur M. Gustafson
Plant Manager

AMG:sa

cc: Ken Westlake, U.S. EPA, Region V w/encl.
cc: Paula Cotter, DHM, CO w/encl.

CYANAMID

To: A. M. Gustafson

Location: Perrysburg

From: F. A. Howland

Location: Perrysburg

Subject: PLANT EMERGENCY PROCEDURE REVISIONS

Reference:

Date: April 22, 1983

Copy to: R. S. Krigbaum, PB
R. L. Barr, PB
H. F. Limmer, PB
L. D. Myers, PB
J. R. Dotts, PB
R. G. Haas, PB
R. A. Riehl, PB
D. P. Lares, PB
J. S. Holroyde, PB
P. F. Kellermeier, PB
R. P. Johnson, WL
J. J. Fisher, NA

We recently revised the Perrysburg Plant Emergency Procedures. Attached are new pages: 9B, 9C & 9D, along with Revised Page 12 and Revised TABLE OF CONTENTS. Please insert these pages in your copy of the Emergency Procedure and dispose of original page 12 dated May 1981 along with the original TABLE OF CONTENTS.

New Pages 9B, 9C & 9D included a list of Plant Emergency Equipment with there location. Revised Page 12 updates the Polymer Products Division Emergency Call List.

F. A. Howland

FAH:sa

TABLE OF CONTENTS

EMERGENCY TABLE OF ORGANIZATION	PAGE 2
INTRODUCTION	PAGE 3
GUIDE TO EMERGENCY SITUATIONS	PAGES 4, 5 & 6
PLANT SHUTDOWN AND EVACUATION PROCEDURES	PAGES 7, 8, 9 & 9A
PLANT EMERGENCY EQUIPMENT AND LOCATIONS	PAGES 9B, 9C & 9D
BOMB THREAT PROCEDURES	PAGES 10 & 11
PLANT MANAGER'S OFFICE	PAGE 12
SERIOUS INJURY AND FATALITY NOTIFICATION	PAGES 13 & 14
PRESS, RADIO AND T.V. RELATIONS	PAGES 15, 16 & 17
RELEASE OF HAZARDOUS SUBSTANCE	PAGES 18, 19 & 20

PERRYSBURG PLANT EMERGENCY EQUIPMENT AND LOCATIONS

I. FIRE EXTINGUISHERS

A. TYPE - DRY CHEMICAL

NO.	SIZE	LOCATION
1-B	20 LB.	REACTOR OFFICE - OUTSIDE
2-B	20 LB.	WEST END - RECEIVING DOOR - WAREHOUSE
3-B	20 LB.	WEST WALL - FILLER WEIGHOUT ROOM
4-B	20 LB.	NORTH WALL BESIDE LARGE DOOR - NEW WAREHOUSE
5-B	20 LB.	WAREHOUSE - BESIDE SMALL ENTRANCE DOOR
6-B	20 LB.	BACK ROOM - CYGLAS AREA - EAST WALL
7-B	20 LB.	SHIPPING DOCK - EAST WALL
8-B	20 LB.	MEZZANINE - WEST END - TOP OF STAIRWAY
9-B	5 LB.	OLIVER TRACTOR
10-B	5 LB.	STOCK ROOM
11-B	5 LB.	SPARE - STOCK
12-B	20 LB.	EXTRUDER AREA - WEST WALL
13-B	20 LB.	MAINTENANCE SHOP - EAST WALL
14-B	5 LB.	GMC 3/4 TON PICKUP TRUCK
15-B	20 LB.	WALL - OPPOSITE CATALYST WEIGHOUT ROOM
16-B	20 LB.	UPSTAIRS - HALLWAY
17-B	20 LB.	MAINTENANCE GARAGE
18-B	20 LB.	EAST STAIRWAY - BOTTOM
19-B	20 LB.	MEZZANINE - ELECTRICAL PANEL
20-B	20 LB.	TOP OF GLASKYD REACTOR STAIRS
21-B	20 LB.	PILOT PLANT - WEST WALL
22-B	20 LB.	LOCKER ROOM RESIN PLANT
23-B	20 LB.	WEST WALL - MEZZANINE - RESIN PLANT
24-B	20 LB.	SOUTH WALL - MEZZANINE - RESIN PLANT
25-B	20 LB.	SOUTH WALL - PROCESS AREA - RESIN PLANT
26-B	20 LB.	NORTH WALL - WAREHOUSE - RESIN PLANT
27-B	20 LB.	WEST WALL - WAREHOUSE - RESIN PLANT
28-B	20 LB.	SOUTH WALL - WAREHOUSE - RESIN PLANT
29-B	20 LB.	WEST WALL - PROCESS AREA - RESIN PLANT
30-B	20 LB.	NORTH EAST CORNER - PROCESS ROOM - RESIN PLANT
31-B	20 LB.	EAST WALL - PROCESS AREA - RESIN PLANT
32-B	20 LB.	WEST WALL - LABORATORY - RESIN PLANT
33-B	20 LB.	NORTH WALL - LABORATORY - RESIN PLANT
34-B	20 LB.	NORTH EAST WALL - NEW WAREHOUSE
35-B	20 LB.	NORTH WEST WALL - NEW WAREHOUSE
36-B	6 LB.	SPARE - STOCK
37-B	20 LB.	PILOT PLANT - EAST WALL

REVISED 4/21/83

A. TYPE - DRY CHEMICAL (Cont'd)

NO.	SIZE	LOCATION
38-B	20 LB.	SPARE - STOCK
39-B	20 LB.	COLD ROOM ADDITION
40-B	20 LB.	EAST WALL - MAINTENANCE GARAGE
41-B	5 LB.	SPARE - MAINTENANCE STORAGE
42-B		MEZZANINE - NORTH WALL
43-B		MEZZANINE - NORTH BY STORAGE RACK
44-B		MEZZANINE - BY DUST COLLECTOR
45-B		MEZZANINE - EAST END - BY CARPENTER SHOP

B. TYPE - CO^2

NO.	SIZE	LOCATION
1-C	5 LB.	GLASKYD REACTOR OFFICE
2-C	15 LB.	NEW RESIN AREA
3-C	10 LB.	PIGMENT WEIGHOUT ROOM - OUTSIDE DOOR
4-C	15 LB.	PIGMENT WEIGHOUT ROOM - NORTHWEST CORNER
5-C	15 LB.	EXTRUDER AREA - AT BOTTOM OF STAIRS
6-C	15 LB.	DOORWAY - BETWEEN EXTRUDER RM AND WEIGHOUT AREA
7-C	15 LB.	COLD ROOM - NORTHEAST CORNER
8-C	15 LB.	COLD ROOM - NEAR WEST DOOR
9-C	15 LB.	PRODUCTION AREA OFFICE - OUTSIDE
10-C	15 LB.	TECHNICAL DEPT. LAB - EAST END HALLWAY
11-C	5 LB.	TECHNICAL DEPT. LAB. NORTHWEST END - REAR DOOR
12-C	15 LB.	TECHNICAL DEPT. - PRESS ROOM
13-C	15 LB.	PROTOTYPE SHOP
14-C	15 LB.	MAINTENANCE DEPT. - WEST WALL
15-C	15 LB.	MAIN OFFICE BY WATER FOUNTAIN
16-C	5 LB.	MAIN OFFICE - ACCOUNTING DEPT.
17-C	15 LB.	RESIN PLANT - ELECTRIC CONTROL ROOM - EAST END
18-C	5 LB.	RESIN PLANT - ELECTRIC FORK TRUCK
19-C	15 LB.	RESIN PLANT - ELECTRIC CONTROL RM. - WEST END
20-C	5 LB.	LUNCH ROOM
21-C	15 LB.	PROTOTYPE SHOP - WEST WALL
22-C	15 LB.	UPSTAIRS HALLWAY
23-C	15 LB.	STOCK ROOM - INSIDE
24-C	5 LB.	QUALITY CONTROL LAB - UPSTAIRS
25-C	15 LB.	DUST COLLECTOR - MEZZANINE
26-C	15 LB.	UPSTAIRS AT TOP OF EAST STAIRS
27-C	15 LB.	BOILER - MEZZANINE
28-C	15 LB.	HAZARDOUS MATERIAL STORAGE BLDG.
29-C	15 LB.	PILOT PLANT BOILER ROOM
30-C	15 LB.	TECHNICAL DEPT. - OFFICE HALLWAY
31-C	15 LB.	SPARE STOCK
32-C	15 LB.	RESIN PLANT - HALLWAY BETWEEN OPERATG. AREAS

REVISED 4/21/83

B. TYPE - CO^2 (Cont'd)

NO.	SIZE	LOCATION
33-C	5 LB.	ELECTRIC - STAND ON - FORD TRUCK
34-C	5 LB.	ELECTRIC WELDER - MAINTENANCE SHOP
35-C	5 LB.	ALLIS CHALMERS FORT TRUCK
36-C	15 LB.	SPARE - MAINTENANCE STORAGE
37-C	5 LB.	SHIPPING - YALE LIFT TRUCK
k-1	100 LB.	GLASKYD REACTOR HIGH TEMP. EMERGENCY SYSTEM

II. HOSE LINE AND SELF CONTAINED COMPRESSED AIR BREATHING UNITS

NO.	TYPE	LOCATION
1	Scott Air Pak Self Contained Unit	Alkyd Reactor Lab Room
2	Scott Air Pak Self Contained Unit	Resin Plant, Lab. Room
3	Scott Air Pak II Hose Line Unit	Resin Plant, Portable Tank Entry Cart
4	Scott Air Pak II Hose Line Unit	TANK #1 Resin Plant, Portable Tank Entry Cart
	Spare Tank for Scott Air Pak Self Contained Units	TANK #2 Maintenance Dept. Storage Room, Mezzanine

REVISED 4/21/83

EMERGENCY PROCEDURES

PLANT MANAGER'S OFFICE

The Plant Manager, or in his absence, The Manager of Services, Plant Engineer, Maintenance Supervisor or Production Supervisors (in that order), will:

1. Confirm that the emergency procedures have been implemented in a satisfactory manner.
2. Notify the following Division and Corporate Personnel giving details of the emergency:

Polymer Products Division	Office No.	Home No.
MR. J. J. FISHER	1-201-831-3163	1-201-766-2276
DR. W. L. BERRY	1-201-831-4161	1-201-722-5080
MR. J. C. CAPOROSSI	1-201-831-3452	1-201-838-2836
MR. T. A. CALDWELL, JR.	1-201-831-3033	1-201-327-0508
MR. W. P. BROWN	1-201-831-3063	1-201-722-0982

3. Notify the following insurance companies if their coverage applies:

   A. Fire, Boiler & Machinery - American Risk Management, Inc.
   Cleveland, OH-Mr. John Matthews
   1-216-447-1600

   B. Liability - Insurance Company of North America
   Toledo, OH-Ms. Kathy Smith,Mgr.
   9-882-6852

REVISED 4/21/83

CYANAMIL

American Cyanamid Company
P.O. Box 148
Perrysburg, OH 43551
(419) 874-7941

April 25, 1983

Mr. Louis G. Wehde, Fire Chief
Perrysburg Township Fire Dept.
26609 Lime City Road
Perrysburg, Ohio 43551

Dear Lou:

We recently revised our Plant Emergency Procedures. Attached are new pages: 9B, 9C & 9D, along with revised page 12 and revised Table of Contents. Please insert these pages in your copy of our Plant Emergency Procedures that originally were sent to you on June 1, 1981.

New pages 9B, 9C & 9D include a list of our Plant Emergency Equipment with their location. Revised page 12 updates our Division Emergency Call List. If you have any questions, please do not hesitate to contact me.

Very truly yours,
AMERICAN CYANAMID CO.

F. A. Howland
Manager of Services

FAH:sa

cc: A. M. Gustafson

CYANAMIL

American Cyanamid Company
P.O. Box 148
Perrysburg, OH 43551
(419) 874-7941

April 25, 1983

Mr. Cloyce McGiffin, Police Chief
Perrysburg Township Police Dept.
26711 Lime City Rd.
Perrysburg, OH 43551

Dear Cloyce:

We recently revised our Plant Emergency Procedures. Attached are new pages: 9B, 9C & 9D, along with revised page 12 and revised Table of Contents. Please insert these pages in your copy of our Plant Emergency Procedures that originally were sent to you on June 1, 1981.

New pages 9B, 9C & 9D include a list of our Plant Emergency Equipment with their location. Revised page 12 updates our Division Emergency Call List. If you have any questions, please do not hesitate to contact me.

Very truly yours,
AMERICAN CYANAMID CO.

F. A. Howland
Manager of Services

FAH:sa

cc: A. M. Gustafson

WASTE SOLVENT TYPES RESULTING FROM OPERATIONS

	TYPE		
	USED METHYLENE CHLORIDE	CELLOSOLVE WASTE	NON-AQUEOUS DISTILLATE
HAZARDOUS WASTE NO.	F001	D001	D001
PHYSICAL STATE OF WASTE	Liquid	Liquid	Liquid
EPA HANDLING CODE	S01 - 55 Gal. Drums	S01 - 55 Gal. Drums	S01 - 55 Gal. Drums
PHYSICAL LOCATION OF WASTE	(1) S.W. Corner - Main Mfg. Area	(1) Resin Plant - S.W. Corner	(1) S.W. Corner - Main Mfg. Area
	(2) West Wall - at Pigment Weighout	(2) W'H'S'E' Resin Plant -	
	(3) 100 Gal. Mixer - North Side of Mixer	(3) North Wall - Mfg. Area	
	(4) Resin Plant - North Wall - Mfg. Area		
	(5) Technical Dept. Pilot Plant		

WASTE SOLVENT STORAGE INSPECTION RECORD

INSPECT DAILY - RECORD WEEKLY - ALL LOCATIONS

WEEK OF & DATE	CONDITION OF DRUMS*	CORRECTIVE ACTION TAKEN IF NECESSARY	QUANTITY ON HAND-ALL LOCATIONS									BY:
			METH. CHLOR.					CELLO.			NON-AQ. DIST.	
			(1)	(2)	(3)	(4)	(5)	(1)	(2)	(3)		

*Check that all drums are closed, any leakers, - Are all drums in good shape & labeled.

PERRYSBURG PLANT

PLANS AND COST ESTIMATES FOR CLOSURE/POST CLOSURE REQUIRED UNDER RCRA

It is expected that the generation of hazardous waste will continue during the useful life of the Perrysburg plant, which is estimated to continue in operation until 2003. At this time, when the plant ceases operations, waste generation and storage in the plant will be terminated and the following steps taken to ensure proper cleanup of any areas previously used for hazardous waste.

A. Drum Wastes

(1) All remaining drums of hazardous waste will be removed for disposal by an authorized agency.

(2) In-plant storage sites for these drums will be carefully examined for evidence of contamination by material stored in the drums. If an area is found to be contaminated it will be cleaned by whatever means necessary and the resulting residue of hazardous waste will be transferred to drums. The drums will then be removed for disposal by an authorized agency. There is no storage of hazardous waste outdoors. All hazardous waste is stored indoors on concrete floors.

(3) It is estimated a maximum of 200 drums of hazardous waste could be on hand at any given time. Average number of drums on hand would amount to 50.

(4) It is estimated no more than 90 days would be required to complete this cleanup operation.

B. Post Closure Plan

No post closure plan is required since cleanup as described above will ensure that no hazardous waste remains on the plant property.

C. Cost Estimate For Closure Plan

It is estimated that no more than $5,000 (1983 est.) would be required to complete the cleanup as described above.

CYANAMID

To: ALL SUPERVISORS

Date: April 22, 1983

Location: Perrysburg

Copy to:

From: A. M. Gustafson

Location: Perrysburg

Subject: HAZARDOUS WASTE STORAGE DRUMS

Reference:

Please be sure that in the future all drums containing hazardous wastes (Used Methylene, Cellosolve Waste, Non-Aqueous Distillate) are closed at all times except when adding to or removing wastes from the drums.

A. M. Gustafson

AMG:rv

OhioEPA

Re: Wood County
Hazardous Materials
American Cyanamid Company
HWFAB #03-87-0383
OHD 005 044 128

G/TSD

Mr. Art Gustafson
American Cyanamid Company
P. O. Box 148
Perrysburg, OH 43551

April 11, 1983

Dear Mr. Gustafson:

On April 8, 1983, Kate Wilson, of the Ohio EPA Northwest District Office, conducted an inspection of the American Cyanamid Company in Perrysburg, which was represented by you. At that time the following problem areas were noted, as referenced by the enclosed inspection form:

Part 4 (D)(1)(e)

Please include in your Contingency Plan a list of all emergency equipment, including physical description and outline of capabilities. (40 CFR 265.51 and Ohio Administrative Code (OAC) 3745-65-52.)

Part 4 (E)(1)(a-e)

Please include in the operating record: the EPA Hazardous Waste Identification Number and physical state of the waste, the estimated amount of waste, the EPA Handling Code for your storage method, and the present physical location of each hazardous waste within the facility. (40 CFR 265.73 and OAC 3745-65-73.)

Part 4 (G)(1)(a,e)

It is necessary for an expected date of closure to be included in your Closure Plan. (40 CFR 265.112 and OAC 3745-66-12.)

Part 5 (I)(1)&(2)&(4)

The main storage areas met all the regulations and were in good shape. The "satellite" storage areas, where drums are being filled near process lines, also need to be inspected at least weekly and those inspections documented. Also, between times of adding to or removing wastes from the drums the drums must be closed. (40 CFR 265.170-.177 and OAC 3745-66-(70-77).)

Northwest District Office
1035 Devlac Grove Drive, Bowling Green, Ohio 43402-4598 (419) 352-8461

Richard F. Celeste, Governor
Robert H. Maynard, Director

Part 5 (I)(5)

This is not a requirement, but since your drums containing hazardous wastes are often the same drums the raw materials arrive in, are not necessarily visibly different, and are stored in the same locations as your non-waste drums, I suggest you afix the hazardous waste labels to the appropriate drums when waste accumulation begins.

Please send to this office copies of all forms or information to document how and when the above deficiencies will be corrected within thirty (30) days of the date of this letter.

If you have any questions about the inspection, please feel free to call me at 419/352-8461.

Sincerely,

Kate Wilson

Katherine L. Wilson
Environmental Scientist

KLW/kb

Enclosure

cc: Ken Westlake, U.S. EPA, Region V w/encl.
cc: Paula Cotter, DHM, CO w/encl.

4/8 9AM
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 03 87-0383

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OHD 005044128

Facility: AMERICAN CYANAMID COMPANY Address: P.O. BOX 148 City: PERRYSBURG

State: OHIO Zip Code: 43551 County: WOOD Telephone: 419/874-7941

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	ART GUSTAFSON	PLANT MANAGER	419/874-7941
2.			
3.			

INSPECTOR(S)

1.	KATE WILSON	ENVIRONMENTAL SCIENTIST	419/352-8461
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- [ ] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [x] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- [x] General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure
- [x] Containers S01
- [ ] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

Revised 9/15/82

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	X			
2. If "yes", is it complete and accurate?	X			
3. Has the facility submitted a Part B?		X		

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Manufacture of alkyd and polyester molding compounds, and electrocoating resins. Storage is within buildings; some wastes stored near products &/or raw materials.

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	X			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?		X		F002 methylene Cl. is recycled & returned
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).		X		city water + connected to sanitary sewer ~~laboratory~~ & cooling water
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	X			
b) 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 Section 262.20.	X			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	X			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	X			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	X			

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	X			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	X			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	X			transporter placards
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.			X	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".			X	
b) The date that accumulation began is clearly marked on each container.			X	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(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 (Section 262.34).	X			no new employees
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	X			

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards	D: Contingency and Emergency	G: Closure
C: Preparedness and Prevention	E: Manifest/Records/Reporting	H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	X			
2. The operator has 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 (Section 265.13(b)).	X			processes don't Δ
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	X			
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).		X		ignitable
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or	X			facility operates 24 hr/5 ADT system when people out of facility
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2).	X			

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	X			
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	X			
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)	X			weekly
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(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.	X			
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	X			
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	X			separate warehouse & no smoking
b) Physical separation of incompatible waste materials.	X			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	X			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	X			Butanol spill when receiving product, leaky drums
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				contacted ER, sent report to state ER
a) Internal alarm system.	X			
b) Access to telephone, radio or other device for summoning emergency assistance.	X			PA system hooks to phones
c) Portable fire control equipment.	X			
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	X			sprinkler syst
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	X			weekly-respirators fire ext.
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	X			
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	X			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)	X			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	X			
b) Arrangements or agreements with local or state emergency authorities.	X			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	X			
d) A list of all emergency equipment including location, physical description and outline of capabilities.		X		in inspection records
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))	X			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)	X			
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)			X	
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)	X			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart E: Manifests/Records/Reporting

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

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:

	Yes	No	N/A	Remark #
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1)		X		
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).		X		
c) The estimated (or actual) weight, volume or density of the waste material(s).		X		
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).		X		
e) The present physical location of each hazardous waste within the facility.		X		
f) 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 number(s). (265.73(b)(2)			X	
g) Records of any waste analyses and trial tests required to be performed.	X			
h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).	X			
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).	X			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	X			

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.	X			

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

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)			X	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)				
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))				
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.				
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.				

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)	X			
a) A description of how and when the facility will be closed. (265.112(a)(1).		X		not when

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	X			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.(NOTE: Maximum inventory should agree with the permit.)	X			
d) A description of steps taken to decontaminate facility equipment.	X			
e) The year closure is expected to begin and a schedule for the various phases of closure.		X		
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.			X	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.			X	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)

	Yes	No	N/A	Remark #
a) A closure trust fund, or				
b) A surety bond, or				
c) A closure letter of credit, or				
d) A combination of financial mechanisms.	X			

corporate guarantee and financial test

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.	X			

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)		X		#2 (over)
b) In good physical condition (265.171)	X			
c) Compatible with the wastes stored in them (265.172)	X			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))		X		#2 (over)
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	X			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)		X		#2 (over)
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	X			#1
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c)	X			

#1 Since the hazardous waste-filled drums are often in the same area as the product and raw material drums, and are not visibly very different I request he label the HW drums immediately as such rather than waiting until ready to transport a load off the premises

Revised 9/15/82

#2 The drums in the final storage area are closed. Drums in the satellite areas are not closed between times of adding wastes to them. Both types of storage areas must meet Subpart I regulations - including inspections at least weekly.

RCRA INTERIM STATUS INSPECTION FORM

U.S. EPA I.D. NO. OHD 005044128

PART 1. GENERAL INFORMATION

Facility: American Cyanamid Co Address: 12600 Eckel Rd. City: Perrysburg

State: Ohio Zip Code: 43551 County: Wood Telephone: 419-874-7941

Facility Operator: Art Gustafson Title: Plant Manager Telephone: 419-874-7941

Facility Owner: American Cyanamid Co. Address: Berdan Ave.

City: Wayne State: New Jersey Zip Code: 07470 Telephone: 201-831-2000

Type of Ownership: ✓ Private ____ Government State HWFAB No. 03-87-0383

Date of Inspection: 2-19-82 Time of Inspection: (Start) 10:42 (Finish) 11:50

Advance Notification? ____ No ✓ Yes: by telephone

Weather Conditions: moderate temperatures, overcast,

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Arthur M. Gustafson	Plant Manager	419-874-7941
2.			
3.			
4.			

EPA 9011

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Thomas K. Wray	Hazardous Waste Scientist	419-352-8461
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ✓ Generation B. ✓ Storage C. ____ Treatment D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F003, U031, F001, U080, D007, D008, P100, U220

b) Non-Listed Wastes: ✓ D001 I ✓ D002 C ____ D003 R ____ D000 T

3. Has this facility submitted a Part A Permit Application? ✓ Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

____ Yes, See Remark # ____ ✓ No

EPA 9011

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has 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 Sections 265.13(a)(1) and 3745-55-13-A-2.	√			
2. The operator has 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 (Sections 265.13(b) and 3745-55-13-B).	√			
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	√			
b) Artificial or natural barrier completely surrounding the active portion of the facility.			√	
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	√			
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	√			

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ✓ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

Company manufactures alkyd and polyester molding compounds and electrocoating resins. Waste materials from process manufacture are stored indoors.

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	—	—	—	—
a) Inspect emergency equipment.	✓	—	—	—
b) Inspect monitoring equipment.	—	—	✓	—
c) Inspect security, alarm and communications devices.	✓	—	—	—
d) Inspect process equipment (pipes, pumps, etc.).	—	—	✓	—
e) Inspect containment structures (dikes, curbs, etc.).	✓	—	—	—
f) Inspect facility for structural malfunctions (roof, floor, etc.).	✓	—	—	—
g) Inspect hazardous waste handling/loading areas each day used.	✓	—	—	—
h) Record of any malfunctions due to equipment or operator errors.	✓	—	—	—
i) Record of any hazardous waste discharges.	✓	—	—	—
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-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.	✓	—	—	—
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓	—	—	—
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	✓	—	—	—

EPA 9014

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.	√			
b) Physical separation of incompatible waste materials.	√			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	√			
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	√			

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		√		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).				
a) Internal alarm system	√			PA
b) Access to telephone, radio or other device for summoning emergency assistance.	√			
c) Portable fire control equipment.	√			
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	√			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	√			WEEKLY INSP. BY SAFETY MGR.
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).			√	

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	✓			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	✓			

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	✓			
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(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	✓			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	✓			

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	✓			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.			✓	

Subpart E: Manifests/Records/Reporting

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

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	✓			
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓			

	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.	✓			
f) 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 number(s) (265.73(b)(2) and 3745-55-73-B-2).			✓	
g) Records of any waste analyses and trial tests required to be performed.	✓			
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	✓			
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	✓			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	✓			
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	✓			

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).			✓	

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

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).			✓	

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).			✓	
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	✓			
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.			✓	
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.			✓	

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.			✓	

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.			✓	
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.			✓	

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	✓			
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	✓			
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	✓			
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	✓			

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.			✓	
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.			✓	
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.			✓	
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).			✓	
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).			✓	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.				
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.				
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.				
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.				

	Yes	No	N/A	Remark #
9. The property owner has 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 Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.			✓	

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	✓			

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	✓			
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	✓			

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	✓			
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).			✓	

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	✓			

Subpart J: Storage in Tanks N/A

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.				
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).				
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).				
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).				
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).				
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.				
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.				

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	___	___	___	_____
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	___	___	___	_____
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	___	___	___	_____
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	___	___	___	_____
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	___	___	___	_____
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	___	___	___	_____

OhioEPA

Re: Wood County
Hazardous Materials
American Cyanamid Company
HWFAB No. 03-87-0383

RECEIVED
FEB 25 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

Arthur M. Gustafson
American Cyanamid Company
12600 Eckel Road
Perrysburg, OH 43551

February 22, 1982

Dear Mr. Gustafson:

On February 19, 1982, Tom Wray, Ohio EPA Northwest District Office, conducted an inspection of the American Cyanamid Company located at 12600 Eckel Road, Perrysburg. The facility was found to be in compliance with all applicable State and federal regulations. A copy of the form completed during the inspection is enclosed.

If you have any questions about the inspection, please call me at 352-8461.

Sincerely,

Tom Wray

Thomas K. Wray
Hazardous Waste Scientist

TKW:sd

cc: Kathy Homer, U.S. EPA, Region V w/encl.
cc: Paula Cotter, DHM, C.O. w/encl.
cc: Bob Fragale, HWFAB w/encl.

State of Ohio Environmental Protection Agency
Northwest District Office
1035 Devlac Grove Drive, Bowling Green, Ohio 43402-4598 (419) 352-8461

James A. Rhodes, Governor
Wayne S. Nichols, Director

CYANAMID

File

American Cyanamid Company
P.O. Box 148
Perrysburg, OH 43551
(419) 874-7941

RECEIVED
SEP 21 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

Sept. 16, 1981

State of Ohio Environmental Protection Agency
Box 1049
361 E. Broad Street
Columbus, Ohio 43216

Attention: Mr. Paul Flanigan, P.E.
Hazardous Waste Materials Management

Dear Mr. Flanigan:

We are writing this letter to you in regards to your letter of August 28 concerning the recent inspection made of our facility by your representatives on August 24.

As mentioned to you during our recent telephone conversation, we are somewhat confused as to why certain deficiencies were noted in the "Deficiency Notification Table" enclosed with the letter.

Specifically, we feel deficiencies noted under Column I Item Nos. III D2,3,5,6,7 & 8 in the "Deficiency Notification Table" are in error and we are wondering why they were so noted since we had no indication at the time of the inspection that we were not in compliance with the requirements of these sections nor does the inspection report indicate we were not in compliance.

As we discussed, we would appreciate it if you would look into this when the paperwork again becomes available to you and confirm our belief that the deficiencies noted were done so in error. If, however, your review indicates otherwise in your judgement, please inform us of your finding so that any necessary corrective action may be taken by us.

In regard to the deficiencies noted under Column I Item No. V A3 and Column I Item No. VI C2c, we wish to advise you these were corrected by August 26. This action was communicated to your Mr. Tom Wray at your Northwest Ohio District Office on August 28 (see copy of letter attached).

CYANAMID

We believe on the basis of the above that this location is in full compliance with the various regulations concerning the storage and handling of our hazardous wastes and would respectfully request you confirm this upon completion of your review.

If you should have any questions regarding our operation please advise.

Very truly yours,

Arthur M. Gustafson

Arthur M. Gustafson
Plant Manager

AMG:sa

cc: Mr. Thomas Wray
State of Ohio EPA
Northwest District Office
1035 Devlac Grove Drive
Bowling Green, Ohio 43404

Ms. Kathleen Homer
United States EPA
Region V
230 South Dearborn St.
Chicago, Illinois 60604

CYANAMID

American Cyanamid Company
P.O. Box 148
Perrysburg, OH 43551
(419) 874-7941

August 28, 198

State of Ohio EPA
Northwest District Office
1035 Devlac Grove Drive
Bowling Green, Ohio 43404

Attention: Mr. Thomas Wray

Dear Mr. Wray:

Many thanks for the information you sent me this week which will be of great help in our effort to be sure we are correctly following the various afflicable regulations in the storage and handling of our hazardous wastes.

We would also advise you that the corrections necessary in our paperwork procedures, which you noted during your inspection here on August 24, were completed on August 26, 1981.

Again, thanks, and if you should have any questions regarding our operation please advise.

Very truly yours,

Arthur M. Gustafson

Arthur M. Gustafson
Plant Manager

AMG:sa

Re: Application Number 81-HW-0383
Wood County

August 28, 1981

RECEIVED
AUG 31 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

Arthur M. Gustafson
Plant Manager
American Cyanamid Company
P.O. Box 148
Perrysburg, Ohio 43551

Dear Mr. Gustafson:

On August 24, 1981, Thomas Wray of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Thomas Wray, NWDO

CERTIFIED MAIL

wood

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-HW-0383
OWNER - American Cyanamid Company
FACILITY NAME - American Cyanamid Co.
FACILITY LOCATION - 12600 Eckel Road
FACILITY CONTACT - Arthur M. Gustafson Plant Manager PHONE NO. - 419/874-7941
ISS INSPECTION DATE - August 24, 1981

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15			
	2	"	"	B		
	3	"	"	B		
4	4	"	"			
	5	"	"	B		
	6	"	"	B		
	7	"	"	B		
	8	"	"	B		
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
		A	2	3745-55-52	265.52	B	✓	
			3	"	"			
			4	"	"			
			5	"	"			
7		B	1	3745-55-53	265.53			
		C	1	3745-55-55	265.55			
			2	"	"			
			3	"	"			
		D	1	3745-55-56	265.56			
	VI	A	1	3745-55-71	265.71			
			2	"	"			
		B	1	3745-55-72	265.72			
8		C	1	3745-55-73	265.73			
			2b	"	"			
			c	"	"	C	✓	
			d	"	"			
			e	"	"			
			f	"	"			
			g	"	"			
9	VII	A	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.142			
		B	1	3745-56-09	265.118			
	VIII	I	1	3745-56-51	265.171			
			2	3745-56-52	265.172			
			3	3745-56-53	265.173			
			4	"	"			
			5	3745-56-54	265.174			
			6	3745-56-56	265.176			
10			7	3745-56-57	265.177			
			8	"	"			
		J	1	3745-56-72	265-192			
			2	"	"			
			3	"	"			
			4	3745-56-73	265-193			
			5	3745-56-74	265.194			
			6	3745-56-78	265.198			
			7	3745-56-79	265.199			
11			8	3745-56-78	265.198			
		K	1	3745-57-03	265.222			
			2	3745-57-04	265.223			
			3	3745-57-06	265.225			
			4	3745-57-07	265.226			
			5	"	"			
			6	3745-57-10	265.229			
			7	3745-57-11	265.230			

Item No.				OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12		L	1	3745-57-31	265.251			
			2	3745-57-32	265.252			
			3		265.258			
			4	3745-57-36	265.256			
			5	"	"			
			6	3745-57-37	265.257			
			7	3745-57-37	265.257			
13		M	1	3745-57-52	265.272			
			2	"	"			
			3	3745-57-53	265.273			
			4	3745-57-56	265.276			
			5	3745-57-58	265.278			
			6	3745-57-58	265.278			
			7	3745-57-59	265.279			
			8	3745-57-61	265.281			
			9	3745-57-62	265.282			
14	N	A	1	3745-57-72	265.302			
			2	"	"			
			3	"	"			
			4	"	"			
		B	1	3745-57-79	265.309			
			2	"	"			
		C	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.192			
		D	1	3745-57-82	265.312			
15				3745-55-17	265.17(b)			
		E	1	3745-57-83	265.313			
			2	3745-55-17	265.17(b)			
		F	1	3745-57-84	265.314			
			2	"	"			
			3	"	"			
			4	"	"			
		G	1	3745-57-85	265.315			
16		O&P						
	I	B	1	3745-58-33	265.373			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
	II	A	1a	3745-58-35	265.375			
			b	"	"			
			c	"	"			
17								
			2a	3745-58-35	265.375			
			b	"	"			
		B	1	"	"			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			

Page	Item No.				OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	III	A	1		3745-58-37	265.377			
		B	1		"	"			
		C	1		"	"			
		D	1		"	"			
		E	1		"	"			
		F	1		"	"			
		G	1		"	"			
18	IV	A	1		3745-58-42	265.382			
			2		"	"			
		Q	1		3745-58-51	265.401			
			2		"	"			
19			3		3745-58-52	265.402			
			4		3745-58-53	265.403			
			5		3745-58-55	265-405			
			6		3745-58-56	265.406			
	IX I	(A)			3745-52-40	262.40			
		(B)	1		3745-52-21	262.21			
			2		"	"			
20			3		"	"			
			4		"	"			
			5		"	"			
			6		"	"			
			7		"	"			
			8		50-42	122.6			
		(C)			3745-52-42	262.42			
	2	(A)			3745-52-30	262.30			
		(B)			3745-52-31	262.31			
		(C)			3745-52-33	262.33			
21	3		1		3745-52-34	262.34			
			2		"	"			
			3		3745-56-54	265.174			
			4a		3745-56-72	265.192			
			b		"	"			
			c		"	"			
			d		3745-56-74	265.184			
			e		3745-56-78	265.198			
			f		3745-56-79	265.199			
22	VI	A			3745-52-40	262.40			
		B			3745-52-41	262.41			
	VII		1a		3745-52-50	262.50			
			b		"	"			
			c		"	"			
			2		"	"			
23	X I				3745-53-22	263.22			
	II	A			3745-53-20	263.20			
		B			"	"			
	V	A			3745-53-10	263.10			
		B			3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.

B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.

D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.

E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.

F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.

G. NFPA's code requires that the tanks be located 50 feet from the property line.

T/ IDENTIFICATION NUMBER
81-HW-0383

EPA IDENTIFICATION NUMBER
OHD 005044128

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

A) Facility Name: AMERICAN CYANAMID CO.

B) Street: 12600 ECKEL RD

C) City: PERRYSBURG (D) State: OH (E) Zip Code: 43551

F) Phone: 419-874-7941 (G) County: WOOD

H) Operator: Same

I) Street:

J) City: (K) State: (L) Zip Code

M) Phone: (N) County:

O) Owner: AMERICAN CYANAMID COMPANY

P) Street: BELDAN AVE

Q) City: WAYNE (R) State: NJ (S) Zip Code: 07470

T) Phone: 201-831-2000 (U) County:

V) Date of Inspection: 8/24/81 (W) Time of Inspection (From) 9:30 (To) 11:47

X) Weather Conditions:

(Y) Person(s) Interviewed	Title	Telephone
Arthur M. Gustafson	Plant Manager	419-874-7941

(Z) Inspection Participants	Agency/Title	Telephone
Dave Ferguson	Env. Scientist	419-352-8461
Tom Wray	Haz. Waste Sci	"

(AA) Preparer Information

Name	Agency/Title	Telephone
Tom Wray	Haz Waste Sci	as above

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	N/A			
2. Facility expansion?	N/A			
B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	N/A			
C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X			Automatic Detection System; For operation 24 hours Today
2. Artificial or natural barrier around facility?		X		
3. Controlled entry?		X		
4. Danger sign(s) at entrance?	X			
D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X			
2. Records of operator error?	X			
3. Records of discharges?	X			

ot Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	X			
5. Safety, emergency equipment?				
6. Security devices?				
7. Operating and structural devices?				
8. Inspection log?				
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X			
2. Job descriptions?	X			
3. Description of training?	X			
4. Records of training?	X			
5. Have facility personnel received required training by 5-19-81?	X			
6. Do new personnel receive required training within six months?	X			
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X			
2. No smoking signs?	X			DESIGNATED AREAS OF NO SMOKING ONLY
3. Separation and protection from ignition sources?	X			

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
A) Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		X		
B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	X			PA System
2. Telephone or 2-way radios at the scene of operations?	X			Telephones
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			Sprinkler system; Fire extinguishers throughout plant

Indicate the volume of water and/or foam available for fire control:

City water; hydrants located at strategic points around plant.

C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			INSPECTED WEEKLY BY SAFETY MGR.
2. Is emergency equipment maintained in operable conditions?	X			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	X			

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? X

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			ADDRESSES NOT INCLUDED
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
B) Are copies of the Contingency Plan available at site and local emergency organizations?	X			
C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	X			NO INCIDENTS REPORTED

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	X			However, nothing has yet been shipped.
2. Are records of past shipments retained for 3 years?	X			
B) Does the owner or operator meet requirements regarding manifest discrepancies?	X			

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?	X			
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X			
c. The location and quantity of each hazardous waste within the facility?	X			Quantity not listed
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	N/A			
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			
f. Reports detailing all incidents that required implementation of the Contingency Plan?	X			
g. All closure and post closure costs as applicable? (Effective 5-19-81)	X			

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
ı) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	X			
2. Has this plan been submitted to the Regional Administrator		X		
3. Has closure begun?		X		
4. Is closure estimate available by May 19, 1981?	X			
ı) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	N/A			

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

cility Name: American Cyanamid Co Date of Inspection: 8/24/81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			indoor storage area
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X			ignitable.

	Yes	No	II*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	X			
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	X			

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

*Not Inspected

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	___	___	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	X			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6. The total quantity of waste(s) and the type and number of containers loaded?	X			
7. Required certification?	X			
8. Required signatures?	X			
(C) Does the owner or operator submit exception reports when needed?	X			

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	X			
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	X			
(C) If required, are placards available to transporters of hazardous waste?	X			

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			
(B) Has the generator submitted Annual Reports and Exception Reports as required?	X			

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		X		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

D. Corrective Action

Mark

CYANAMID

American Cyanamid Company
P.O. Box 148 — 12600 Eckel Rd.
Perrysburg, OH 43551
(419) 874-7941

July 15, 1991

RCRA Activities
Region V
P. O. Box A3587
Chicago, Illinois 60690

A "Certification Regarding Potential Releases from Solid Waste Management Units" for the Perrysburg, Ohio Facility of American Cyanamid Company was submitted to your office on March 14, 1986. (Attachment I)

I would like to amend this form to include three (3) waste Pits 9 feet deep, with 4 feet of cover, 18 feet long and 12 feet wide. The contents are largely unknown.

The amended form is included (Attachment II).

Very truly yours,

John G. DeMarco

John G. DeMarco
Plant Manager

(ATTACHMENT I)

RTIFICATION REGARDING POTENTIAL _EASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: AMERICAN CYANAMID CO.

EPA I.D. NUMBER: OHD005044128

LOCATION CITY: PERRYSBURG,

STATE: OHIO

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill		X
• Surface Impoundment	X	
• Land Farm	X	
• Waste Pile		X
• Incinerator		X
• Storage Tank (Above Ground)	X	
• Storage Tank (Underground)		X
• Container Storage Area		X
• Injection Wells		X
• Wastewater Treatment Units		X
• Transfer Stations		X
• Waste Recycling Operations		X
• Waste Treatment, Detoxification		X
• Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

SURFACE IMPOUNDMENT - Waste alkyd resin distillate stored 1964-1977. Estimated maximum storage ≈1200 gal. ph ≈ 1. Periodically pumped out. Pumped empty 1977. Subsequent inspections of site show no residue and several checks of soil ph indicate ≈8.

LAND FARM - Waste alkyd resin distillate (ph>2.5) spread on specific area per permit from State of Ohio. Area monitored; Annual report sent to State of Ohio. Area shows good plant growth. Monitoring shows good degradation of resin distillate components.

STORAGE TANK - 8000 gal. capacity. Maximum inventory 6000 gals. Used to store waste alkyd resin distillate (ph>2.5) prior to land farm application. No leaks or spills.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

a. Date of release
b. Type of waste released
c. Quantity or volume of waste released
d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE KNOWN

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NONE KNOWN

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

ARTHUR M. GUSTAFSON, PLANT MANAGER
Typed Name and Title

Arthur M. Gustafson
Signature

3/14/86
Date

"RTIFICATION REGARDING POTENTIAL ' 'EASES FROM SOLID WASTE MANAGEMENT U..ITS

(ATTACHMENT II)

FACILITY NAME: AMERICAN CYANAMID CO.

EPA I.D. NUMBER: OHD005044128

LOCATION CITY: PERRYSBURG,

STATE: OHIO

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill		X
• Surface Impoundment	X	
• Land Farm	X	
• Waste Pile		X
• Incinerator		X
• Storage Tank (Above Ground)	X	
• Storage Tank (Underground)		X
• Container Storage Area		X
• Injection Wells		X
• Wastewater Treatment Units		X
• Transfer Stations		X
• Waste Recycling Operations		X
• Waste Treatment, Detoxification		X
• Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

SURFACE IMPOUNDMENT - Waste alkyd resin distillate stored 1964-1977. Estimated maximum storage ≈1200 gal. ph ≈ 1. Periodically pumped out. Pumped empty 1977. Subsequent inspections of site show no residue and several checks of soil ph indicate ≈8.

LAND FARM - Waste alkyd resin distillate (ph>2.5) spread on specific area per permit from State of Ohio. Area monitored; Annual report sent to State of Ohio. Area shows good plant growth. Monitoring shows good degradation of resin distillate components.

STORAGE TANK - 8000 gal. capacity. Maximum inventory 6000 gals. Used to store waste alkyd resin distillate (ph>2.5) prior to land farm application. No leaks or spills.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

Waste Pits (3) Three pits 9 feet deep, with 4 feet of cover, 18 feet long and 12 feet wide. Contents largely unknown.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   NONE KNOWN

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

   NONE KNOWN

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

ARTHUR M. GUSTAFSON, PLANT MANAGER
Typed Name and Title

Arthur M. Gustafson
Signature

3/14/86
Date

Revision by: John G. DeMarco, Plant Manager

John G. DeMarco
Signature

7/15/91
Date

REV 8-1-9

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

Closed

FACILITY NAME: AMERICAN CYANAMID CO.

EPA I.D. NUMBER: OHD005044128

LOCATION CITY: PERRYSBURG,

STATE: OHIO

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill		X
• Surface Impoundment	X	
• Land Farm	X	
• Waste Pile		X
• Incinerator		X
• Storage Tank (Above Ground)	X	
• Storage Tank (Underground)		X
• Container Storage Area		X
• Injection Wells		X
• Wastewater Treatment Units		X
• Transfer Stations		X
• Waste Recycling Operations		X
• Waste Treatment, Detoxification		X
• Other _____		X

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

SURFACE IMPOUNDMENT - Waste alkyd resin distillate stored 1964-1977. Estimated maximum storage ≈1200 gal. ph ≈ 1. Periodically pumped out. Pumped empty 1977. Subsequent inspections of site show no residue and several checks of soil ph indicate ≈8.

LAND FARM - Waste alkyd resin distillate (ph>2.5) spread on specific area per permit from State of Ohio. Area monitored; Annual report sent to State of Ohio. Area shows good plant growth. Monitoring shows good degradation of resin distillate components.

STORAGE TANK - 8000 gal. capacity. Maximum inventory 6000 gals. Used to store waste alkyd resin distillate (ph>2.5) prior to land farm application. No leaks or spills.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   NONE KNOWN

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

   NONE KNOWN

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

ARTHUR M. GUSTAFSON, PLANT MANAGER
Typed Name and Title

Arthur M. Gustafson
Signature

3/14/86
Date