APPENDIX C

INVENTORY OF DOCUMENTATION AND REFERENCE DOCUMENTS

Document List – Stone Industrial

April 10, 1981	Letter indicating revised quantities and materials
July 14, 1981	Letter regarding Conditions of Operation During Interim Status
February 23, 1982	US EPA Region III Hazardous Waste Report
June 10, 1982	US EPA Region III RCRA Inspection Summary
July 20, 1982	US EPA Region III RCRA Inspection Summary
September 26, 1983	Letter from Department of Health and Hygiene regarding withdrawal of permit application
January 19, 1984	Letter regarding 90-day storage
March 22, 1984	Hazardous Waste Monitoring and Enforcement Log
April 17, 1986	Letter regarding facility equipment locations
February 2, 1988	Letter from Stone Industrial indicating name change
April 1, 1988	RCRA Inspection Report
May 3, 1988	RCRA Inspection Report
July 19, 1988	Notice indicating Interim Status withdrawn by Maryland
October 1989	Environmental Priorities Initiative Preliminary Assessment of Stone Industrial
October 9, 1989	Letter to MDE regarding MEK release
September 28, 1990	Addendum to Environmental Priorities Initiative Preliminary Assessment Reports
March 22, 1993	Letter regarding removal of 6 USTs
March 11, 1994	Letter regarding malfunction of Regenerative Thermal Oxidizer
April 7, 1994	Site Complaint
April 25, 1994	Letter regarding malfunction of Regenerative Thermal Oxidizer

May 24, 1994	Letter regarding malfunction of Regenerative Thermal Oxidizer
October 3, 1994	Letter regarding malfunction of Regenerative Thermal Oxidizer
December 13, 1994	Letter regarding malfunction of Regenerative Thermal Oxidizer
1995	Updated Site Layout Plan
April 28, 1995	Letter regarding malfunction of Regenerative Thermal Oxidizer
May 22, 1996	Letter regarding malfunction of Regenerative Thermal Oxidizer
May 2, 1997	Letter regarding previous removal of USTs
June 15, 1999	Letter regarding Permit to Construct Four Spiral Tube Winders
December 13, 1999	Letter regarding Emission Certification for 1999
August 3, 2000	MDE Report of Observations
September 5, 2000	Correspondence Regarding Secondary Containment for Drums
January 15, 2002	Correspondence Containing Contingency Plan for Emergency Response Procedures
August 16, 2007	MDE Waste Management Administration Inspection Report
April 28, 2009	Air and Radiation Management Administration – Inspection and Observation Report
June 1, 2009	Operating Permit under Air and Radiation Management Administration
January 26, 2010	Wastewater Manifest

April 10, 1981

Letter indicating revised quantities and materials

Stone Industrial Division J.L.CLARK Manufacturing Co.

51ST AVENUE & CREE LANE • COLLEGE PARK, MD. 20740 • (301) 474-3100 • TWX 710-826-0462

April 10, 1981

Environmental Protection Agency
Region 3
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

Attention: Mr. Bill Walsh 3 EN24

Dear Mr. Walsh:

This letter is in reference to our phone conversation of April 9 regarding form 3 RCRA.

On page one of five we will change 82 to read 410 gallons as our maximum storage. We are in the process of purchasing a solvent recovery unit with intentions of accumulating this quantity and then operating the recovery unit.

On page three of five we will change IV a to read F005, and not U159, the reason being that methyl ethyl ketone is a constituent of the waste.

Sincerely yours,

STONE INDUSTRIAL DIVISION
J. L. CLARK MANUFACTURING COMPANY

John H. Easto

John H. Easto
Chief Engineer

JHE/jgm

RECORD OF COMMUNICATION

☑ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: JOHN H EASTO
J. L. CLARK MFG. CO.
STONE INDUSTRIAL DIV.

FROM: BILL WALSH
RASS

DATE 4/9/81

TIME 10:05AM

SUBJECT

Phase 2 Problem

SUMMARY OF COMMUNICATION

I called Mr. Easto to ask him if the waste code U159 shown on pg. 3, Form 3 represented a waste or a raw material. He stated that it was a waste in a spent form & not an off-spec commercial chemical product. I referred him to waste code F005 as a possible correct representation of his waste. I also asked him to change the unit of measure & quantity shown under process design capacity to correctly reflect the total number of drums he stores on site. He will send a letter amending his Part A to reflect these needed changes.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES
TO:

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

July 14, 1981

Letter regarding Conditions of Operation During Interim Status

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

JUL 14 1981

Mr. R. G. Lambert
J. L. Clark Mfg. Company-Stone Industrial Division
51st Avenue & Cree Lane
College Park, MD 20740

Dear Mr. Lambert:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, 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. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

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 enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulkin

Shirley D. Bulkin
Chief, RCRA, Administrative Support Section
Permits Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING
INTERIM STATUS

Date Prepared: July 14, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location, and EPA Identification Number.

Name: Clark, J. L. Mfg. Company-Stone Industrial Division

Location: 51st Avenue & Cree Lane
College Park, MD 20740

EPA I.D. No.: MDD 05 859 4920

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. R. G. Lambert, Vice President

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

PROCESS	DESIGN CAPACITY
S01	410 Gals.

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

F005

February 23, 1982

US EPA Region III Hazardous Waste Report

Cla. R, [illegible]

Please print or type with ELITE type *(12 characters per inch).*

GSA No. 12345-XX
Form Approved OMB No. 158-R00XX

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE REPORT

PLEASE PLACE LABEL IN THIS SPACE

I. TYPE OF HAZARDOUS WASTE REPORT

PART A: GENERATOR ANNUAL REPORT
THIS REPORT IS FOR THE YEAR ENDING DEC. 31, 1981

PART B: FACILITY ANNUAL REPORT
THIS REPORT FOR YEAR ENDING DEC. 31, 19

PART C: UNMANIFESTED WASTE REPORT
THIS REPORT IS FOR A WASTE RECEIVED *(day, mo., & yr.)* - - 19

INSTRUCTIONS: You may have received a preprinted label attached to the front of this pamphlet; affix it in the designated space above—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 Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing this form. The information requested herein is required by law *(Section 3002/3004 of the Resource Conservation and Recovery Act).*

II. INSTALLATION'S EPA I.D. NUMBER

F MDD058594920 1

III. NAME OF INSTALLATION

STONE INDUSTRIAL DIVISION

IV. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX
3 51ST AVE & CREE LANE

CITY OR TOWN / ST. / ZIP CODE
4 COLLEGE PARK MD 20740

V. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER
5 51ST AVE & CREE LANE

CITY OR TOWN / ST. / ZIP CODE
6 COLLEGE PARK MD 20740

VI. INSTALLATION CONTACT

NAME *(last and first)*
2 EASTO JOHN H

PHONE NO. *(area code & no.)*
301-474-3100

VII. TRANSPORTATION SERVICES USED *(for Part A reports only)*

List the EPA Identification Numbers for those transporters whose services were used during the reporting year represented by this report.

BFI CHEMICAL SERVICE
MDD000797373

VIII. COST ESTIMATES FOR FACILITIES *(for Part B reports only)*

A. COST ESTIMATE FOR FACILITY CLOSURE
G $, ,

B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE *(disposal facilities only)*
$, ,

IX. 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.

JOHN H. EASTO — A. PRINT OR TYPE NAME
John H. Easto — B. SIGNATURE
2-23-82 — C. DATE SIGNED

EPA Form 8700-13 (5-80)

Please print or type with ELITE type (12 characters/inch).

GSA No. 12345-XX
Form Approved OMB No. 158-R00XX

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERATOR ANNUAL REPORT – PART A
(Collected under the authority of Section 3002 of RCRA.)

FOR OFFICIAL USE ONLY (Items 1 and 2)

1. DATE RECEIVED: – – 19

2. TYPE OF REPORT:

X. GENERATOR'S EPA I.D. NO.: G MDD 0565949 20 1

XI. FACILITY'S EPA I.D. NO.: MDD 000797365

XII. FACILITY NAME (specify): BROWNING & FERRIS

XIII. FACILITY ADDRESS (street or P.O. box, city, state, & zip code): SOLLY ROAD GLEN BURNIE MD. 21061

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (enter code)
1	NA 1133 CEMENT ADHESIVE – SOLID	08	E005	57834	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XV. COMMENTS (enter information by line number — see instructions)

EPA Form 8700-13A (5-80)

BILLING CODE 6560-01-C

June 10, 1982

US EPA Region III RCRA Inspection Summary

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III – 6th & Walnut Sts.
Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection– J.L. Clark Mfg. Co. MDD 05 859 4920

DATE: June 10, 1982

FROM Harry J. Weber, Environmental Scientist
Superfund/RCRA Compliance Section (3AW23)

TO: File

Thru: Walter F. Lee, Chief
Superfund/RCRA Compliance Section (3AW23)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME.

State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 W. Preston St., Balto. MD 21201

DHS Inspection Form
Generators/TSD Facilities

YR MO DY: 8 2 0 1 2 1 5

TIME: 0 1 1 P M

EPA ID Number: M D D 0 5 8 5 9 4 9 2 0

TELEPHONE: 3 0 1 - 4 7 4 - 3 1 0 0

Owner/Operator J. L. CLARK MFG. CO. Facility Name STONE INDUSTRIAL DIVISION

Address 51ST AVE. + CREE LANE, COLLEGE PARK, MD Zip 20740

Description of Work Activity MANUFACTURING OF SPIRAL WOUND TUBING

I. Generators

A. Description (10.51.03.01-.03)

1) Does the Facility generate or has it accumulated those quantities of hazardous waste described in 10.51.02.05 C.? ✓ Yes, ____ No. (NO / YES)
2) Has the facility obtained an EPA identification number? ✓ Yes. ____ No.
3) Describe the amount of waste generated. (day, week or month) ABT 1600 LBS PER MONTH
4) Under which category is the waste(s)? ✓ Ignitable ____ Reactive ____ Corrosive ✓ EP Toxic ____ RCRA Listed

B. Manifest (10.51.03.04)

1) Is Maryland manifest system in operation for off-site shipment? ✓ Yes, ____ No.
2) Is TSD Facility to receive DHS identified by ✓ Name, ✓ Address, ✓ EPA ID Number?
3) Is alternate facility identified? ____ Yes, ✓ No.
4) Is generator identified by ✓ Name, ✓ Address, ✓ Telephone Number, ✓ MD/EPA ID Number?
5) Is each transporter identified by ✓ Name, ✓ EPA ID Number, ✓ Maryland Certification Number?
6) Is waste property described? ____ Yes, ✓ No. CORRECTIONS HAVE BEEN MADE
7) Is shipment date marked? ✓ Yes, ____ No.
8) Is quantity of waste described by ✓ Unit of Weight, ____ Volume?
9) Are containers to be loaded identified by ✓ Type, ✓ Number?
10) Is proper certification noted and signed by generator? ✓ Yes. ____ No.
11) Are adequate copies available for operator, transporter and TSD? ✓ Yes, ____ No.

C. Pre-Transport Requirements (10.51.03.05)

1) Is each container marked with date accumulation began? ✓ Yes. ____ No. If yes, has any waste been stored over 90 days? ____ Yes, ✓ No. How much ____
2) Are containers in good condition? ✓ Yes, ____ No. If no, explain ____
3) Are containers properly labeled? ____ Yes, ✓ No. - NEED FLAMMABLE STICKERS
4) Does generator have approved emergency contingency plan? ____ Yes, ✓ No.

D. Recordkeeping and Reporting (10.51.03.06)

1) Does the generator have: copies of all signed manifests from the previous three years? ____ Yes. ✓ No; copies of each Annual Report and Exception Report? ____ Yes. ✓ No. (ANN'L REPORT FOR 1981 ONLY) (FOR LAST 2 YRS)
2) Does the generator retain, for a period of three years, all wastes analyses? ____ Yes ✓ No. ONLY FOR 1981
3) Has the generator filed Exception Reports as required by 10.51.03.05 C? ____ Yes. ✓ No. NO NEED TO

II. Treatment, Storage, Disposal (TSD)

A. Site characterization (10.51.05.02)

1) Facility Type

____ Thermal Treatment
____ Recycling/Recovery
____ Waste Oil
____ Chemical Treatment
____ Physical Treatment
____ Open Pile
____ Surface Impoundment
✓ Drums
____ Above Ground Tank(s)
____ Biological Treatment
____ Land Treatment
____ Incineration
____ Landfill Operation
____ Below Ground Tanks
____ Other ____

2) Does facility generate DHS? ✓ Yes, ____ No.
3) Does facility have waste analysis plan? ____ Yes, ✓ No. (NOT WRITTEN) If yes, are the procedures of that plan being followed? ____ Yes, ____ No.
4) Can facility personnel identify DHS being handled? ✓ Yes, ____ No.
5) Can facility personnel confirm that DHS received equal those on manifest form? ____ Yes, ____ No. N/A
6) Is there a 24-Hour surveillance system to monitor active portion of facility? ____ Yes, ✓ No. If No, is there an artificial or natural boundary? ✓ Yes, ____ No. Is there a means to control entry? ✓ Yes, ____ No. Is there a restricted access sign posted? ____ Yes, ✓ No.
7) Does facility have: ✓ emergency equipment inspection log, ✓ written schedule for inspections, ✓ security devices, operating & structural prevention equipment?
8) Have facility personnel completed classroom/on-site training? ✓ Yes, ____ No. Are records maintained of: ✓ Job titles/names of employees ✓ job descriptions. ____ Type/amount of continuing training? FOR OJT ONLY
9) Are general requirements for Ignitable, Reactive or Incompatible Wastes as required in 10.51.05.02 H addressed? ✓ Yes, ____ No.

B. Preparedness and Prevention (10.51.05.03)

1) Facility has the following equipment? YES Internal communication/alarm system for on-site personnel. YES device for summoning emergency assistance. YES adequate fire control equipment, water, & suppression chemicals. NO list of aforementioned equipment. NO WRITTEN LIST
2) Does facility have adequate area for emergency movement? ✓ Yes, ____ No.

C. Contingency Plan and Emergency Procedures (10.51.05.04)

1) Does facility have an approved contingency plan for: NO Personnel to implement emergency procedures to fire, explosions, and unplanned releases to air, soil and water? NO Responding emergency units to provide assistance during emergency situations? NO A list of emergency equipment needed to cope with situation?
2) Are emergency response coordinators listed by name, address, & phone number? ____ Yes, ✓ No.
3) Is there an evacuation plan if recommended? ____ Yes, ✓ No.
4) Are emergency coordinators available on twenty-four hour basis? ____ Yes, ✓ No.

D. Manifest System, Recordkeeping, and Reporting (10.51.05.05)

Facility has a written operating record which contains the following information:

1) ____ description & quantity of DHS received.
2) ____ method & date of DHS treatment, storage, or disposal.
3) ____ location & quantity at each DHS location in facility.
4) ____ detailed records & results of waste analysis & treatability tests performed.
5) ____ detailed operating summary reports.
6) ____ description of emergency incidents that required implementation of contingency plan.
7) ____ records & results of inspections of emergency equipment, TSD systems & hazardous waste areas.
8) Has facility retained, for at least 3 years, copies of all manifests? ____ Yes, ____ No.

J. L. CLARK
2-25-82

N/A

E. Groundwater Monitoring (10.51.05.06)

1) Has facility implemented a groundwater monitoring program? _____Yes, _____No, _____N/A.
2) Are samples from the groundwater monitoring system being analyzed according to the groundwater sampling and analyses plan? _____Yes, _____No.
3) Is this plan set up in accordance with 10.51.05.06 C? _____Yes, _____No.
4) Has groundwater quality assessment program been prepared? _____Yes, _____No.
5) Are proper groundwater sampling and analyses records kept? _____Yes, _____No.
6) Are the necessary reports on groundwater monitoring information being forwarded to the Secretary? _____Yes, _____No.
7) Do the reports match the facility records? _____Yes, _____No.

N/A

F. Closure, Post-closure, and Financial Requirement (10.51.05.07 & .08)

1) Does the facility have an approved closure plan that meets the financial requirements? _____Yes. ✓ No.
2) For surface impoundments, land treatment, and landfills, does the facility have an approved post-closure plan that meets the financial requirements? _____Yes, _____No.
3) Does facility maintain liability insurance? _____Yes, _____No. ?

G. Container Management (10.51.05.09)

1) Are all containers: (a)_____ in good condition, i.e., no signs of leakage, corrosion, or any other deterioration/deformation; (b)_____ lined or made of compatible material such that hazardous wastes placed into them will not result in reaction or corrosion; (c)_____sealed during storage.
2) Are storage areas for hazardous waste containers inspected by owner/operator at least once a week? ✓ Yes, _____No.
3) Is an inspection log maintained? _____Yes, ✓ No.
4) Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? _____Yes, ✓ No.
5) Are incompatible wastes placed in separate containers? _____Yes, _____No. N/A
6) Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? _____Yes, _____No. N/A

N/A

H. Tanks (10.51.05.10)

1) Are all tanks in good condition, i.e., no signs of leakage, corrosion, or any other deterioration: _____Yes, _____No.
2) Are uncovered tanks operated to ensure a minimum of two feet of freeboard? _____Yes, _____No.
   If not, is tank equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of top 2 ft. of the tank? _____Yes, _____No.
3) Are tanks with continuous inflow of hazardous waste equipped with a means to stop this inflow (e.g., waste feed cut-off system or by-pass to a standby tank)? _____Yes, _____No.
4) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into tank used for storage or treatment? _____Yes, _____No.
5) Are daily inspections conducted for discharge control equipment (e.g., by-pass systems, waste feed cut-off systems and drainage systems)? _____Yes, _____No.
6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? _____Yes, _____No.
7) Is the level of waste in the tank checked at least once each operating day? _____Yes, _____No.
8) Is (are) the tank(s) inspected weekly to detect corrosion or leaking of fixtures or seams? _____Yes, _____No.
9) Are the results of these inspections recorded in an inspection log or summary? _____Yes _____No.
10) Are ignitable or reactive wastes stored in tanks? _____Yes, _____No. If yes:
    a) Is the waste treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of materials no longer meets the definition of ignitable or reactive wastes under Parts 261.21 or 261.23 of the RCRA Regulations? _____Yes, _____No.
    b) Is waste stored or treated in such a way that it is protected from material or conditions which may cause the waste to ignite or react? _____Yes, _____No.
    c) Is owner/operator of a facility which treats or stores ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Association's (NEPA's) buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the "Flammable and Combustible Code—1977"? _____Yes, _____No.

N/A

I. Surface Impoundments (10.51.05.11)

1) Is two feet of freeboard maintained in the surface impoundment? _____Yes, _____No.
2) Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity? _____Yes. _____No.
3) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment? _____Yes, _____No.
4) Is the freeboard level inspected daily? _____Yes. _____No.
5) Is the surface impoundment, including dikes and vegetation, inspected weekly to detect leaks, deterioration, or failures in the impoundment? _____Yes, _____No.
6) Are the results of these inspections recorded in an inspection log or summary? _____Yes, _____No.
7) Are ignitable or reactive wastes stored in a surface impoundment? _____Yes, _____No. If yes:
   a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under Parts 261.21 or 261.23 of the RCRA Regulations? _____Yes, _____No.
   b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided? _____Yes, _____No.

N/A

J. Waste Pile (10.51.05.12)

1) Is wind dispersal of the pile controlled? _____Yes, _____No, _____Not Needed.
2) Are additions to the pile being analyzed prior to adding them to the pile? _____Yes, _____No.
3) Is hazardous waste leachate or runoff collected? _____Yes, _____No. Is the pile protected from precipitation and run-on? _____Yes, _____No.
4) Are ignitible or reactive wastes protected from materials or conditions that might cause it to ignite or react? _____Yes, _____No, _____N/A.
5) Are incompatible wastes hauled in a manner as to assure separation? _____Yes, _____No, _____N/A.

N/A

K. Land Treatment (10.51.05.13)

1) Will the use of land treatment result in the waste being less hazardous or non-hazardous? _____Yes, _____No.
2) Is run-on diverted away from the active portion of the facility? _____Yes, _____No. Is run-off from the active portion of the facility collected? _____Yes, _____No.
3) Has the proper waste analyses been peformed? _____Yes, _____No.
4) If food chain crops are to be grown on the active portion of the facility has the necessary documentation required been provided? _____Yes, _____No.
5) Has the owner/operator written and implemented an unsaturated zone monitoring plan? _____Yes. _____No.
6) Have the additional requirements for a closure and post-closure plan been addressed? _____Yes. _____No.
7) Are ignitable or reactive wastes immediately incorporated into the soil? _____Yes. _____No.
8) Are incompatible wastes hauled according to 10.51.05.13 I? _____Yes, _____No.

N/A

L. Landfills (10.51.05.14)

1) Is run-on diverted away from the facility's active portions? _____Yes. _____No.
2) Is run-off collected from the landfill's active portions? _____Yes. _____No.
3) Has a hazardous waste determination been made on the run-off? (Identification and Listing of Hazardous Waste) _____Yes, _____No.
4) Is the landfill managed so as to control wind dispersal? _____Yes, _____No.

N/A

5) Are the following items maintained in the operating record: _____on a map, the exact location and dimensions, including depth, of each cell with respect to permanently surveyed benchmarks? _____contents of each cell and approximate location of each hazardous waste type within the cell?
6) Are bulk, non-containerized or waste containing free liquids placed in the landfill? _____Yes, _____No. If yes: _____ is a leachate collection system available to remove leachate?, and _____is the liquid stabilized or treated physically or chemically prior to disposal?
7) Are empty containers crushed flat or shredded before burial in the landfill? _____Yes, _____No.
8) Are containers holding liquid wastes (or waste containing free liquids placed in the landfill? _____Yes, _____No. If yes, describe containers on comments below.
9) Are ignitable or reactive wastes placed in a landfill? _____Yes. _____No. If yes: _____Is the waste treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste? _____Are incompatible wastes segregated in different landfill cells?

N/A

M. Incinerator/Thermal Treatment (10.51.05.15 & .16)

1) Prior to burning waste not previously incinerated or thermally processed, does the operator conduct waste analysis for the following:
_____heating value of the waste;
_____halogen content and sulfur in the waste;
_____concentrations of lead and mercury unless documented data is available which show these elements not to be present?
2) Are instruments related to combustion and emission control monitored at least every 15 minutes? _____Yes, _____No.
3) Is the stack plume observed visually at least hourly for color and opacity? _____Yes. _____No, _____N/A.
4) Is the incinerator or thermal process and associated equipment inspected daily for leaks, spills and fugitive emissions? _____Yes, _____No.
5) Is all of the above information documented in the facility's operating record? _____Yes, _____No.

N/A

N. Chemical, Physical and Biological Treatment (10.51.05.17)

1) Are all treatment processes or equipment in good condition, i.e., no signs of leakage, corrosion or any other deterioration? _____Yes, _____No.
2) Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop the inflow? (e.g., waste feed cutoff system or bypass system to a standby containment device) _____Yes, _____No.
3) Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? _____Yes, _____No.
4) Is this information recorded in the facility's operating record? _____Yes, _____No.
5) Are daily inspections conducted for discharge control equipment (e.g., bypass systems, waste feed cutoff systems, drainage systems and pressure relief systems)? _____Yes, _____No.
6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) daily? _____Yes, _____No.
7) Are construction materials of the treatment process or equipment and the immediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration? _____Yes, _____No.
8) Are the results of these inspections recorded in an inspection log or summary? _____Yes, _____No.
9) Are ignitable or reactive wastes placed in a treatment process? _____Yes, _____No. If yes:
_____Are wastes treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive wastes under Section 261.21 or 261.23 of the RCRA Regulations?
_____Are wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react?
10) Are incompatible wastes kept from being placed in the same treatment process or equipment? _____Yes, _____No.

O. Permit Requirements (10.51.07)

1) Does the facility have a DHS permit for its activity? _____Yes, ✓ No.
If no, has the facility submitted an application for a DHS permit? ✓ Yes, _____No.
2) List any special Permit requirements that are not in full compliance.
CONTINGENCY PLAN, CLOSURE REQUIREMENTS; PREPAREDNESS & PREVENTION, INSPECTION LOG

Comments: APPLICATION FOR DHS STORAGE PERMIT MADE IN JAN 1982. PERMIT APPLICATION HAS BEEN ASSIGNED FILE # A257. BERNARD DEMKOWSKI (OEP - HAZARDOUS WASTE PERMITS SECTION, STATE HEALTH DEP'T) HAS BEEN ASSIGNED TO THIS PERMIT. PHONE # 383-5734.

THE WASTE IN STORAGE IS APPROX 4% METHYL ETHYL KETONE MIXED WITH A POLYESTER ADHESIVE. MEK IS THE ONLY HAZARDOUS CONSTITUENT. THE WASTE IN STORAGE IS A SLUDGE OF VERY HIGH VISCOSITY, NEARLY INCAPABLE OF FLOWING. 9 ~~[illegible]~~ 55-GAL DRUMS OF WASTE ARE IN STORAGE NOW. OLDEST ACCUMULATION DATE IS 11-30-81. ALL DRUMS ARE IN GOOD CONDITION. MOST DRUMS DO NOT HAVE FLAMMABLE WARNING STICKERS. ALL HAVE HAZ. WASTE STICKERS.

Inspector's Name: [illegible] Title: [illegible]

Facility Location: [illegible] INDUSTRIAL DIV OF J.L. CLARK MFG.

Facility Rep. present during inspection: [illegible] Title: [illegible]

July 20, 1982

US EPA Region III RCRA Inspection Summary

Region III — Jul. & Walnut Sts.
Philadelphia, Pa. 19106

J.L. Cl k Mfg
MDD 058 594 920

JECT: RCRA Inspection-

DATE: July 20, 1982

Harry J. Weber, Environmental Scientist
OM Superfund/RCRA Compliance Section (3AW23)

File

Thru: Walter F. Lee, Chief
Superfund/RCRA Compliance Section (3AW23)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME.

State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 W. Preston St., Balto. MD 21201

YR	MO	DY
81	04	08

DHS Inspection Form
Generators/TSD Facilities

TIME: 01 PM

EPA ID Number: MDD058594920

TELEPHONE: 301-474-3100

Owner/Operator J.L. CLARK MFG. CO. Facility Name STONE INDUSTRIAL DIVISION

Address 51ST AVE. + CREE LANE, COLLEGE PARK, MD Zip 20740

Description of Work Activity MANUFACTURING OF SPIRAL WOUND TUBING

I. Generators

A. Description (10.51.03.01-.03)

1) Does the Facility generate or has it accumulated those quantities of hazardous waste described in 10.51.02.05 C.? ✓ Yes, ___ No.
2) Has the facility obtained an EPA identification number? ✓ Yes, ___ No.
3) Describe the amount of waste generated. (day, week or month) ABOUT 900-1200 LBS PER MONTH
4) Under which category is the waste(s)? ✓ Ignitable ___ Reactive ___ Corrosive ✓ EP Toxic ✓ RCRA Listed

B. Manifest (10.51.03.04)

1) Is Maryland manifest system in operation for off-site shipment? ✓ Yes, ___ No.
2) Is TSD Facility to receive DHS identified by ✓ Name, ✓ Address, ✓ EPA ID Number?
3) Is alternate facility identified? ___ Yes, ✓ No.
4) Is generator identified by ✓ Name, ✓ Address, ✓ Telephone Number, ✓ MD/EPA ID Number?
5) Is each transporter identified by ✓ Name, ✓ EPA ID Number, ✓ Maryland Certification Number?
6) Is waste property described? ___ Yes, ✓ No.
7) Is shipment date marked? ✓ Yes, ___ No.
8) Is quantity of waste described by ✓ Unit of Weight, ___ Volume?
9) Are containers to be loaded identified by ✓ Type, ✓ Number?
10) Is proper certification noted and signed by generator? ✓ Yes, ___ No.
11) Are adequate copies available for operator, transporter and TSD? ✓ Yes, ___ No.

CORRECTIONS HAVE BEEN MADE

C. Pre-Transport Requirements (10.51.03.05)

1) Is each container marked with date accumulation began? ✓ Yes, ___ No. If yes, has any waste been stored over 90 days? ✓ Yes, ___ No. How much 3 55-GAL DRUMS
2) Are containers in good condition? ✓ Yes, ___ No. If no, explain
3) Are containers properly labeled? ✓ Yes, ___ No.
4) Does generator have approved emergency contingency plan? ___ Yes, ___ No. SITE HAS AN EMERGENCY PLAN, BUT IT NEEDS AMENDING TO COMPLY WITH ALL PROVISIONS OF THE REGULATION

D. Recordkeeping and Reporting (10.51.03.06)

1) Does the generator have: copies of all signed manifests from the previous three years? ___ Yes, ✓ No; (HAS FOR 2 YRS) copies of each Annual Report and Exception Report? ___ Yes, ___ No. (ANNUAL REPORT FOR 1981 ONLY)
2) Does the generator retain, for a period of three years, all wastes analyses? ___ Yes, ✓ No. (ONLY FOR 1981)
3) Has the generator filed Exception Reports as required by 10.51.03.06 C? ___ Yes, ✓ No. NO NEED TO

THERE WERE NO MANIFESTS 3 YRS AGO

II. Treatment, Storage, Disposal (TSD)

A. Site characterization (10.51.05.02)

1) Facility Type
   - ___ Thermal Treatment
   - ___ Recycling/Recovery
   - ___ Waste Oil
   - ___ Chemical Treatment
   - ___ Physical Treatment
   - ___ Open Pile
   - ___ Surface Impoundment
   - ✓ Drums
   - ___ Above Ground Tank(s)
   - ___ Biological Treatment
   - ___ Land Treatment
   - ___ Incineration
   - ___ Landfill Operation
   - ___ Below Ground Tanks
   - ___ Other ___
2) Does facility generate DHS? ✓ Yes, ___ No.
3) Does facility have waste analysis plan? ___ Yes, ✓ No. If yes, are the procedures of that plan being followed? ___ Yes, ___ No.
4) Can facility personnel identify DHS being handled? ✓ Yes, ___ No.
5) Can facility personnel confirm that DHS received equal those on manifest form? ___ Yes, ___ No. N/A
6) Is there a 24-Hour surveillance system to monitor active portion of facility? ✓ Yes, ___ No. (ADT SYSTEM) If No, is there an artificial or natural boundary? ___ Yes, ___ No. Is there a means to control entry? ___ Yes, ___ No. Is there a restricted access sign posted? ___ Yes, ___ No.
7) Does facility have: YES emergency equipment inspection log, YES written schedule for inspections, YES security devices, operating & structural prevention equipment?
8) Have facility personnel completed classroom/on-site training? ✓ Yes, ___ No. Are records maintained of: YES Job titles/names of employees YES job descriptions, YES Type/amount of continuing training?
9) Are general requirements for Ignitable, Reactive or Incompatible Wastes as required in 10.51.05.02 H addressed? ✓ Yes, ___ No.

B. Preparedness and Prevention (10.51.05.03)

1) Facility has the following equipment? YES Internal communication/alarm system for on-site personnel, YES device for summoning emergency assistance, YES adequate fire control equipment, water, & suppression chemicals, YES list of aforementioned equipment.
2) Does facility have adequate area for emergency movement? ✓ Yes, ___ No.

C. Contingency Plan and Emergency Procedures (10.51.05.04)

1) Does facility have an approved contingency plan for: ___ Personnel to implement emergency procedures to fire, explosions, and unplanned releases to air, soil and water? ___ Responding emergency units to provide assistance during emergency situations? ___ A list of emergency equipment needed to cope with situation?
2) Are emergency response coordinators listed by name, address, & phone number? ___ Yes, ___ No.
3) Is there an evacuation plan if recommended? ___ Yes, ___ No.
4) Are emergency coordinators available on twenty-four hour basis? ___ Yes, ___ No.

ALL THIS IS IN EXISTING

D. Manifest System, Recordkeeping, and Reporting (10.51.05.05)

Facility has a written operating record which contains the following information:

1) ___ description & quantity of DHS received. – NONE RECVD FROM OFF
2) ___ method & date of DHS treatment, storage, or disposal.
3) ___ location & quantity at each DHS location in facility.
4) ___ detailed records & results of waste analysis & treatability tests performed.
5) ___ detailed operating summary reports.
6) ___ description of emergency incidents that required implementation of contingency plan.
7) ___ records & results of inspections of emergency equipment. TSD systems & hazardous waste areas.
8) Has facility retained, for at least 3 years, copies of all manifests? ___ Yes, ___ No.

STONE INDUSTRIAL (CLARK)
4-8-82

E. Groundwater Monitoring (10.51.05.06)

N/A

1) Has facility implemented a groundwater monitoring program? _____Yes, _____No, _____N/A.
2) Are samples from the groundwater monitoring system being analyzed according to the groundwater sampling and analyses plan? _____Yes, _____No.
3) is this plan set up in accordance with 10.51.05.06 C? _____Yes, _____No.
4) Has groundwater quality assessment program been prepared? _____Yes, _____No.
5) Are proper groundwater sampling and analyses records kept? _____Yes, _____No.
6) Are the necessary reports on groundwater monitoring information being forwarded to the Secretary? _____Yes, _____No.
7) Do the reports match the facility records? _____Yes, _____No.

F. Closure, Post-closure, and Financial Requirement (10.51.05.07 & .08)

1) Does the facility have an approved closure plan that meets the financial requirements? _____Yes, ✓No.
2) For surface impoundments, land treatment, and landfills, does the facility have an approved post-closure plan that meets the financial requirements? _____Yes, _____No. N/A
3) Does facility maintain liability insurance? ✓Yes, _____No.

G. Container Management (10.51.05.09)

1) Are all containers: (a) YES in good condition, i.e., no signs of leakage, corrosion, or any other deterioration/deformation; (b) YES lined or made of compatible material such that hazardous wastes placed into them will not result in reaction or corrosion; (c) NO sealed during storage. NOT SEALED AT ALL TIMES
2) Are storage areas for hazardous waste containers inspected by owner/operator at least once a week? ✓Yes, _____No.
3) is an inspection log maintained? ✓Yes, _____No.
4) Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? _____Yes, ✓No.
5) Are incompatible wastes placed in separate containers? _____Yes, _____No. N/A
6) Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? _____Yes, _____No. N/A

H. Tanks (10.51.05.10)

N/A

1) Are all tanks in good condition, i.e., no signs of leakage, corrosion, or any other deterioration: _____Yes, _____No.
2) Are uncovered tanks operated to ensure a minimum of two feet of freeboard? _____Yes, _____No.
   If not, is tank equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of top 2 ft. of the tank? _____Yes, _____No.
3) Are tanks with continuous inflow of hazardous waste equipped with a means to stop this inflow (e.g., waste feed cut-off system or by-pass to a standby tank)? _____Yes, _____No.
4) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into tank used for storage or treatment? _____Yes, _____No.
5) Are daily inspections conducted for discharge control equipment (e.g., by-pass systems, waste feed cut-off systems and drainage systems)? _____Yes, _____No.
6) is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? _____Yes, _____No.
7) is the level of waste in the tank checked at least once each operating day? _____Yes, _____No.
8) is (are) the tank(s) inspected weekly to detect corrosion or leaking of fixtures or seams? _____Yes, _____No.
9) Are the results of these inspections recorded in an inspection log or summary? _____Yes _____No.
10) Are ignitable or reactive wastes stored in tanks? _____Yes, _____No. If yes:
    a) is the waste treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of materials no longer meets the definition of ignitable or reactive wastes under Parts 261.21 or 261.23 of the RCRA Regulations? _____Yes, _____No.
    b) Is waste stored or treated in such a way that it is protected from material or conditions which may cause the waste to ignite or react? _____Yes, _____No.
    c) is owner/operator of a facility which treats or stores ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Association's (NEPA's) buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the "Flammable and Combustible Code—1977"? _____Yes, _____No. N/

I. Surface Impoundments (10.51.05.11)

1) Is two feet of freeboard maintained in the surface impoundment? _____Yes, _____No.
2) Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity? _____Yes, _____No.
3) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment? _____Yes, _____No.
4) is the freeboard level inspected daily? _____Yes, _____No.
5) is the surface impoundment, including dikes and vegetation, inspected weekly to detect leaks, deterioration, or failures in the impoundment? _____Yes, _____No.
6) Are the results of these inspections recorded in an inspection log or summary? _____Yes, _____No.
7) Are ignitable or reactive wastes stored in a surface impoundment? _____Yes, _____No. If yes:
   a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under Parts 261.21 or 261.23 of the RCRA Regulations? _____Yes, _____No.
   b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided? _____Yes, _____No.

J. Waste Pile (10.51.05.12)

1) Is wind dispersal of the pile controlled? _____Yes, _____No, _____Not Needed.
2) Are additions to the pile being analyzed prior to adding them to the pile? _____Yes, _____No.
3) is hazardous waste leachate or runoff collected? _____Yes, _____No. Is the pile protected from precipitation and run-on? _____Yes, _____No.
4) Are ignitible or reactive wastes protected from materials or conditions that might cause it to ignite or react? _____Yes, _____No, _____N/A.
5) Are incompatible wastes hauled in a manner as to assure separation? _____Yes, _____No, _____N/A.

K. Land Treatment (10.51.05.13)

1) Will the use of land treatment result in the waste being less hazardous or non-hazardous? _____Yes, _____No.
2) is run-on diverted away from the active portion of the facility? _____Yes, _____No. Is run-off from the active portion of the facility collected? _____Yes, _____No.
3) Has the proper waste analyses been peformed? _____Yes, _____No.
4) If food chain crops are to be grown on the active portion of the facility has the necessary documentation required been provided? _____Yes, _____No.
5) Has the owner/operator written and implemented an unsaturated zone monitoring plan? _____Yes, _____No.
6) Have the additional requirements for a closure and post-closure plan been addressed? _____Yes, _____No.
7) Are ignitable or reactive wastes immediately incorporated into the soil? _____Yes, _____No.
8) Are incompatible wastes hauled according to 10.51.05.13 I? _____Yes, _____No.

L. Landfills (10.51.05.14)

1) is run-on diverted away from the facility's active portions? _____Yes, _____No.
2) is run-off collected from the landfill's active portions? _____Yes, _____No.
3) Has a hazardous waste determination been made on the run-off? (Identification and Listing of Hazardous Waste) _____Yes, _____No.
4) Is the landfill managed so as to control wind dispersal? _____Yes, _____No.

STONE INDUSTRIAL (J. CLARK)
4-8-82

5) Are the following items maintained in the operating record: _____on a map, the exact location and dimensions, including depth, of each cell with respect to permanently surveyed benchmarks? _____contents of each cell and approximate location of each hazardous waste type within the cell?
6) Are bulk, non-containerized or waste containing free liquids placed in the landfill? _____Yes, _____No. If yes: _____ is a leachate collection system available to remove leachate?, and _____is the liquid stabilized or treated physically or chemically prior to disposal?
7) Are empty containers crushed flat or shredded before burial in the landfill? _____Yes, _____No.
8) Are containers holding liquid wastes (or waste containing free liquids placed in the landfill? _____Yes, _____No. If yes, describe containers on comments below.
9) Are ignitable or reactive wastes placed in a landfill? _____Yes, _____No. If yes: _____Is the waste treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste? _____Are incompatible wastes segregated in different landfill cells?

N/A

M. Incinerator/Thermal Treatment (10.51.05.15 & .16)

1) Prior to burning waste not previously incinerated or thermally processed, does the operator conduct waste analysis for the following:
_____heating value of the waste;
_____halogen content and sulfur in the waste;
_____concentrations of lead and mercury unless documented data is available which show these elements not to be present?
2) Are instruments related to combustion and emission control monitored at least every 15 minutes? _____Yes, _____No.
3) Is the stack plume observed visually at least hourly for color and opacity? _____Yes, _____No, _____N/A.
4) Is the incinerator or thermal process and associated equipment inspected daily for leaks, spills and fugitive emissions? _____Yes, _____No.
5) Is all of the above information documented in the facility's operating record? _____Yes, _____No.

N. Chemical, Physical and Biological Treatment (10.51.05.17) — DISTILLATION

1) Are all treatment processes or equipment in good condition, i.e., no signs of leakage, corrosion or any other deterioration? ✓ Yes, _____No.
2) Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop the inflow? (e.g., waste feed cutoff system or bypass system to a standby containment device) _____Yes, _____No.

N/A (NOT CONTINUOUS)

3) Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? _____Yes, _____No. N/A
4) Is this information recorded in the facility's operating record? _____Yes, _____No. N/A
5) Are daily inspections conducted for discharge control equipment (e.g., bypass systems, waste feed cutoff systems, drainage systems and pressure relief systems)? _____Yes, ✓ No. (STILL IS OPERATED ONCE EVERY 2 WKS.)
6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) daily? ✓ Yes, _____No. (WHEN IN OPERAT)
7) Are construction materials of the treatment process or equipment and the immediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration? _____Yes, ✓ No. (ONLY DURING OPERATION)
8) Are the results of these inspections recorded in an inspection log or summary? _____Yes, _____No. ?
9) Are ignitable or reactive wastes placed in a treatment process? ✓ Yes, _____No. If yes:
_____Are wastes treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive wastes under Section 261.21 or 261.23 of the RCRA Regulations? ?
YES Are wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react?
10) Are incompatible wastes kept from being placed in the same treatment process or equipment? _____Yes, _____No. N/A (NO INCOMPATIBLE TREATED)

O. Permit Requirements (10.51.07)

1) Does the facility have a DHS permit for its activity? _____Yes, ✓ No.
If no, has the facility submitted an application for a DHS permit? ✓ Yes, _____No.
2) List any special Permit requirements that are not in full compliance.

WASTE DRUMS IN STORAGE NOT SEALED TODAY

Comments: 13 55-GAL DRUMS OF WASTE ADHESIVE MIXED WITH MEK ARE IN STORAGE NOW. OLDEST DRUM STARTED 11-30-81.

Inspector's Name: Bob Heninger Title: ENVIRONMENTAL HEALTH AIDE

Facility Location: STONE INDUSTRIAL DIV, COLLEGE PARK, MD.

Facility Rep. present during inspection: [signature] Title: Chief Engineer

September 26, 1983

Letter from Department of Health and Hygiene regarding withdrawal of permit application

DEPARTMENT OF HEALTH AND MENTAL HYGIENE

201 WEST PRESTON STREET • BALTIMORE, MARYLAND 21201

~~CHARLES R. BUCK, JR., S.C.D.~~

Adele Wilzack, R.N., M.S., Secretary

5736

September 26, 1983

Mr. John Easto
J. L. Clark Manufacturing
Company
51st Avenue and Cree Lane
College Park, Maryland 20740

Dear Mr. Easto:

This office is in receipt of your correspondence dated September 20, 1983, requesting withdrawal of Facility Permit Application Number A257.

Pursuant to this request, the Waste Management Administration acknowledges the withdrawal of your permit application and has subsequently ceased processing of your application.

You are reminded that as a generator of hazardous waste, you are subject to COMAR 10.51.03 "Standards Applicable to Generators of Hazardous Waste". Generators may accumulate hazardous waste on-site up to ninety days without a Controlled Hazardous Substances Facility Permit being required, providing the requirements of COMAR 10.51.03.05E are met.

Should you require any additional information regarding this matter, please feel free to contact me at the above number.

Sincerely yours,

Marilyn Vantosh
Hazardous Waste Division

MV:sml

cc: Dr. Helen B. McAllister
Mr. Ronald Nelson
Mr. William E. Chicca
Mr. John Koontz
Mr. Richard Steimle
Mr. John Humphries

January 19, 1984

Letter regarding 90-day storage

Stone Industrial Division J.L.CLARK Manufacturing Co.

51ST AVENUE & CREE LANE • COLLEGE PARK, MD. 20740 • (301) 474-3100 • TWX 710-826-0462

January 19, 1984

Mr. John Humphries
United States Environmental Protection Agency
Region III
Sixth and Walnut Streets
Philadelphia, Pennsylvania 19106

Dear Mr. Humphries:

This letter is in reference to a letter recently received from Robert L. Allen, Chief, Waste Management Branch, Air & Waste Management Division (see enclosed copy).

I have been unable to contact Marlyn Vantosh of the Maryland Department of Health regarding this letter. I have talked with her on several occassions about our hazardous waste.

It has been my understanding that because we have our waste picked up within the 90 day period we don't need, or at least up to now, need a permit. Could you clarify this for me. Thank you.

Sincerely yours,

STONE INDUSTRIAL DIVISION
J. L. Clark Manufacturing Company

John H. Easto

John H. Easto
Chief Engineer

JHE/jgm

Enclosure

Coded 1105/4
mg K State 1/27/84

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

MDD058594920

JAN 10 1984

CLARK J.L. MFG. CO. STONE IND DIV.
EASTO, JOHN H. CHIEF ENGINEER
51ST AVENUE AND CREE LANE
COLLEGE PARK MD 20740

Dear Owner/Operator:

On November 23, 1983, EPA granted Phase II, Component A Interim Authorization to the State of Maryland to operate its hazardous waste program in lieu of the Federal program. Phase II, Component A consists of the regulations for permitting the storage and treatment of hazardous wastes in tanks, containers, surface impoundments and waste piles.

From the information which you have submitted to EPA to date, it appears that part or all of your facility will now be permitted only by the State of Maryland. If you dispose of hazardous wastes on land, including surface impoundments, or you incinerate hazardous wastes, you will need a RCRA permit from EPA for those portions of your operation. Where possible, EPA and the State will coordinate their respective permitting programs to enable you to prepare one application covering your entire facility.

Mr. Ronald Nelson is the Director of the Maryland Waste Management Administration of the Department of Health and Mental Hygiene. If you have any questions regarding Maryland's hazardous waste program, Mr. Nelson can be reached at (301) 383-3123.

If you have any questions about this letter or the EPA program, please do not hesitate to contact Mr. John Humphries of my staff, who serves as the Maryland Program Manager. He can be reached at the above address or by calling 215/597-2863.

Sincerely,

Robert L. Allen

Robert L. Allen, Chief
Waste Management Branch
Air & Waste Management Division

cc: Mr. Ronald Nelson

March 22, 1984

Hazardous Waste Monitoring and Enforcement Log

Hazardous Waste Monitoring And Enforcement Log

1. EPA ID: MDD015815914912101
2. FACILITY NAME: J.L. CLARK
3. ADDRESS: 51 ST AVE, COLLEGE PARK, MD

Non-Major

4. TYPE OF REPORT: NON-MAJOR — [X] NEW [ ] UPDATE

State Inspection

5. DATES OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: START 03/22/84 (M D Y)

6. TYPE OF EVALUATION COVERED BY THIS REPORT: [X] EVALUATION INSPECTION [ ] RECORD REVIEW [ ] SAMPLING INSPECTION [ ] SPECIAL INSPECTION

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): START __/__/__ (M D Y)

8. TYPE AND CLASS OF VIOLATION (enter number of violations by type and class):
CLASS III, OTHER
1. NO CONTAINMENT FOR DRUMS

Class of Violation	Area of Violation: GWM	CI/PC	Fin. Res.	Pt. B	Comp. Sched.	Other
I						
II						
III						1

9. ENFORCEMENT ACTIONS for Class I Violations:

Area of Violation	Type of Action Taken (circle one)	Date Action Taken (mdy)	Projected Compliance Date (mdy)	Actual Compliance Date (mdy)	Penalty ($000) Assessed	Penalty ($000) Collected
CLASS III	(Informal) WL/NOV AO CivAc CrimAc	03/22/84	04/02/84	__/__/__		
	Informal WL/NOV AO CivAc CrimAc	__/__/__	__/__/__	__/__/__		
	Informal WL/NOV AO CivAc CrimAc	__/__/__	__/__/__	__/__/__		
	Informal WL/NOV AO CivAc CrimAc	__/__/__	__/__/__	__/__/__		

10. COMMENTS: No Containment for drums

April 17, 1986

Letter regarding facility equipment locations

April 17, 1986

Certified Mail

Mr. Stephen R. Wassersug, Director
Hazardous Waste Management Division
United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Dear Mr. Wassersug:

This letter is in response to your letter to Mr. R. G. Lambert, President (retired).

1) Enclosed find topographic map showing facility and equipment locations.

2) Model 380 Re-claimer

The function of this unit is to separate solvent from an adhesive/solvent mixture. The solvent reclaimer consists of a reclaiming unit and boiler. Attached find information as to how the 380 unit operates.

The solvent recovered is piped directly to our storage tank. We do have the option to direct the solvent into 55 gallon drums as well.

The material drained from the 380 unit is approximately 57-58% solids.

In order to obtain maximum solvent recovery, material drained from the 380 unit is processed through our LS 15 reclaimer. See attached information on this unit. The residue from the LS 15 process is approximately 95-98% solids.

3) The waste processed by the 380 and LS 15 units is from our Mylar winding operation. This waste is a polyester adhesive formulation. The constituents are:

Polyester resins
Methyl Ethyl Ketone
Methyl Isobutyl Ketone
1,1,1-Trichloroethane
Catalyst
Methylene Chloride
1 Butanol (n butyl alcohol

3) continued

The amount of waste generated from the recovery operation of the 380/LS 15 unit is between 15 and 17 drums in 90 days, or between 7,200 and 8,160 pounds in 90 days.

4) Releases

The 380 unit and LS 15 unit are located in an impoundment type area. Any releases due to overflow or broken pipes would flow in the direction of two 55 gallon drums.

Sincerely yours,

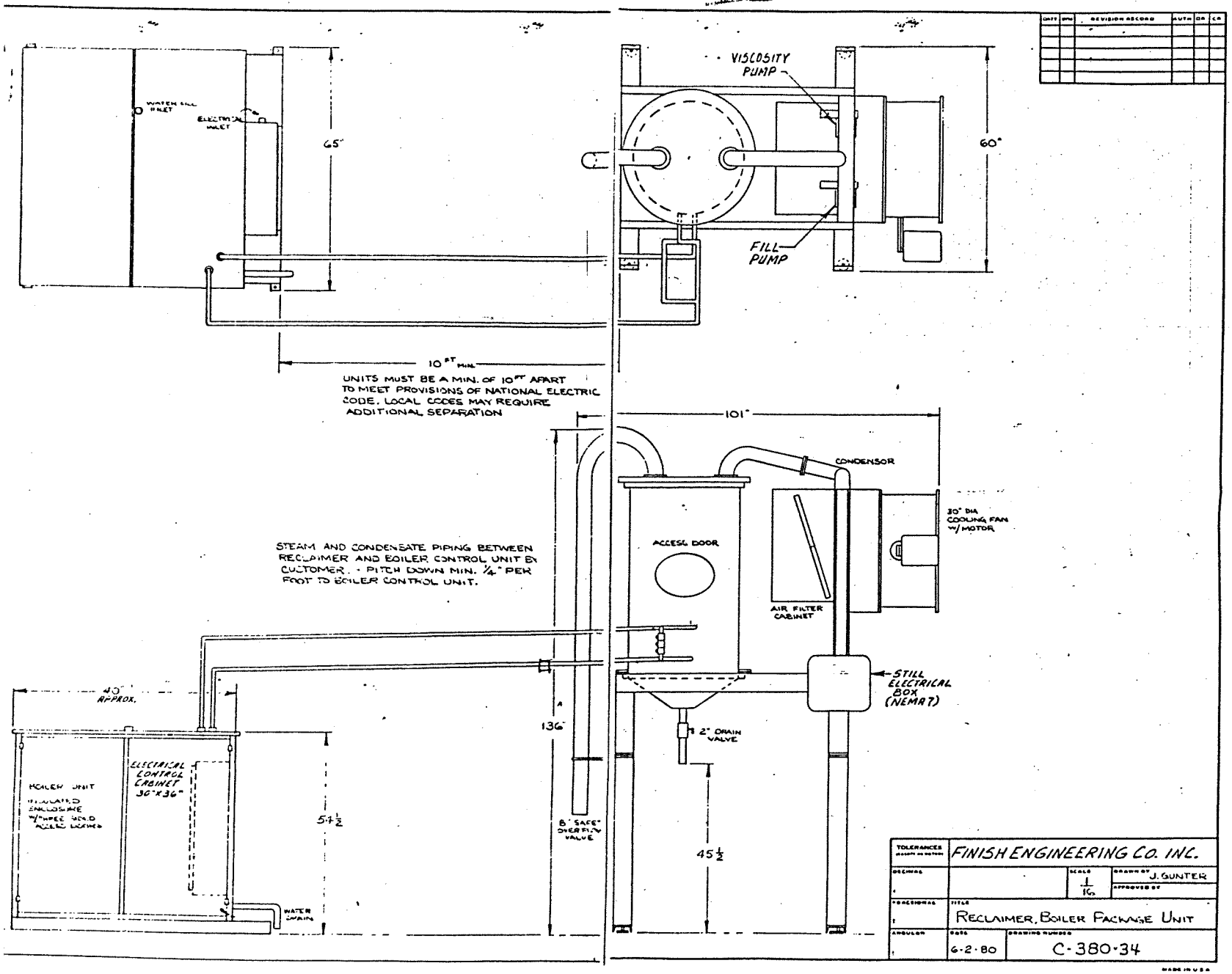
STONE INDUSTRIAL DIVISION
J. L. Clark Manufacturing Co.

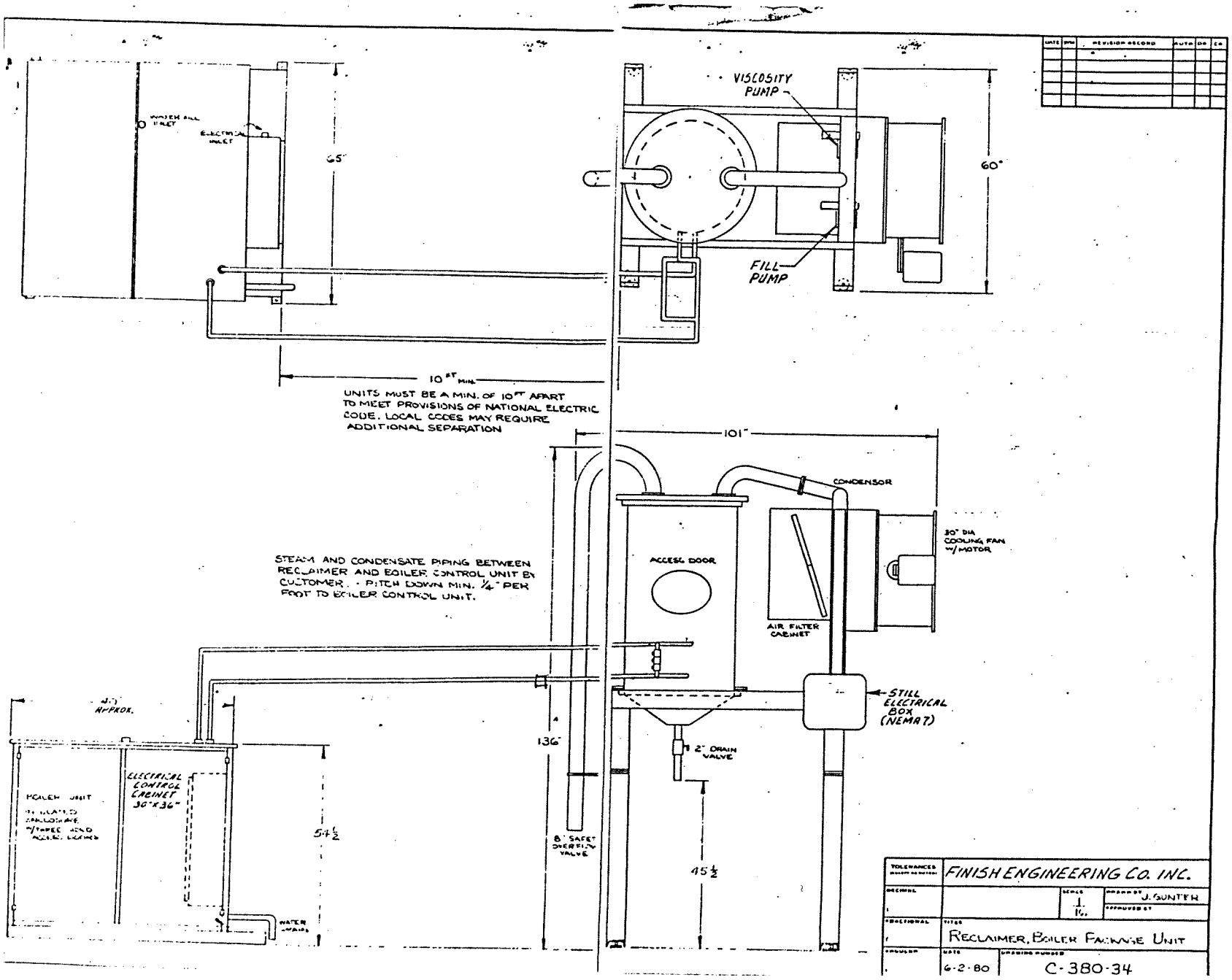
John H. Easto
Chief Engineer

JHE/jgm

Enclosures

cc: Mr. Alvin Bowles, Chief
Hazardous Waste Division
Md. Dept. of Health & Mental Hygiene


WATER FILL INLET
ELECTRICAL INLET
65"
10 FT MIN.
UNITS MUST BE A MIN. OF 10 FT APART TO MEET PROVISIONS OF NATIONAL ELECTRIC CODE. LOCAL CODES MAY REQUIRE ADDITIONAL SEPARATION
VISCOSITY PUMP
FILL PUMP
60"
101"
CONDENSOR
30" DIA COOLING FAN W/ MOTOR
ACCESS DOOR
AIR FILTER CABINET
STEAM AND CONDENSATE PIPING BETWEEN RECLAIMER AND BOILER CONTROL UNIT BY CUSTOMER. - PITCH DOWN MIN. 1/4" PER FOOT TO BOILER CONTROL UNIT.
STILL ELECTRICAL BOX (NEMA 7)
40" APPROX.
136"
2" DRAIN VALVE
BOILER UNIT
ELECTRICAL CONTROL CABINET 36"x36"
54 1/2
8" SAFE OVERFLOW VALVE
45 1/2
WATER DRAIN
FINISH ENGINEERING CO. INC.
TOLERANCES
DECIMAL
FRACTIONAL
ANGULAR
SCALE 1/16
DRAWN BY J. GUNTER
APPROVED BY
TITLE RECLAIMER, BOILER PACKAGE UNIT
DATE 6-2-80
DRAWING NUMBER C-380-34
MADE IN U.S.A.


WATER FILL INLET
ELECTRICAL INLET
65"
VISCOSITY PUMP
60"
FILL PUMP
10 FT MIN.
UNITS MUST BE A MIN. OF 10 FT APART TO MEET PROVISIONS OF NATIONAL ELECTRIC CODE. LOCAL CODES MAY REQUIRE ADDITIONAL SEPARATION
101"
CONDENSOR
30" DIA COOLING FAN W/MOTOR
ACCESS DOOR
AIR FILTER CABINET
STEAM AND CONDENSATE PIPING BETWEEN RECLAIMER AND BOILER CONTROL UNIT BY CUSTOMER. - PITCH DOWN MIN. 1/4" PER FOOT TO BOILER CONTROL UNIT.
STILL ELECTRICAL BOX (NEMA 7)
136"
2" DRAIN VALVE
ELECTRICAL CONTROL CABINET 30"x36"
BOILER UNIT
54 1/2
8" SAFETY OVERFLOW VALVE
45 1/2
WATER INLET
FINISH ENGINEERING CO. INC.
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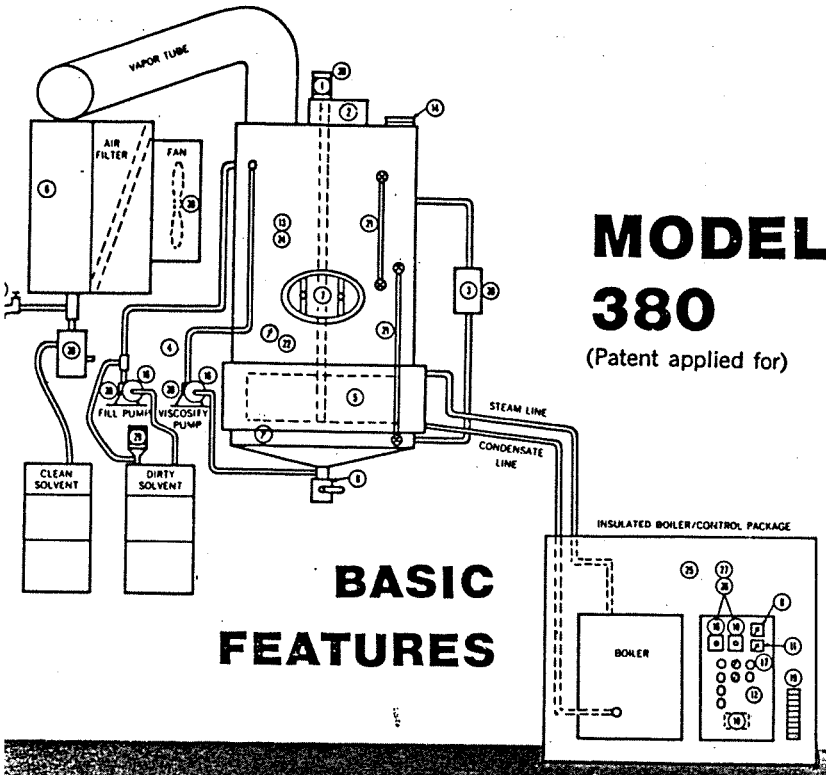


MODEL 380

(Patent applied for)

BASIC FEATURES

These many built in features in the all-new model 380 make for a fully automatic, highly safe Reclaimer that performs efficiently with a minimum of labor involved.

1. Electric motor powered scraper-agitator
2. Scraper shaft overload protection
3. Liquid level controls
4. Internal viscosity indicator
5. Steam heated boiling jacket
6. Air cooled condenser (water for special applications)
7. Heat chamber access clean out door
8. 2" residue drain valve
9. Differential temperature measurement
10. Temperature controls
11. Fill pump timer
12. Separate remote electric controls with indicating pilot lights
13. Chamber with carbon steel construction and full heat area insulation
14. Low pressure safety valve
15. Condensate sampling system
16. Pump piping clean out system
17. Automatic shutdown
18. Automatic cycle
19. Outdoor winter freeze up protection
20. Explosion proof electricals Class I Group D NEMA 7
21. Reclaimer liquid level indicators
22. Reclaimer liquid temperature indicator

Optional Features

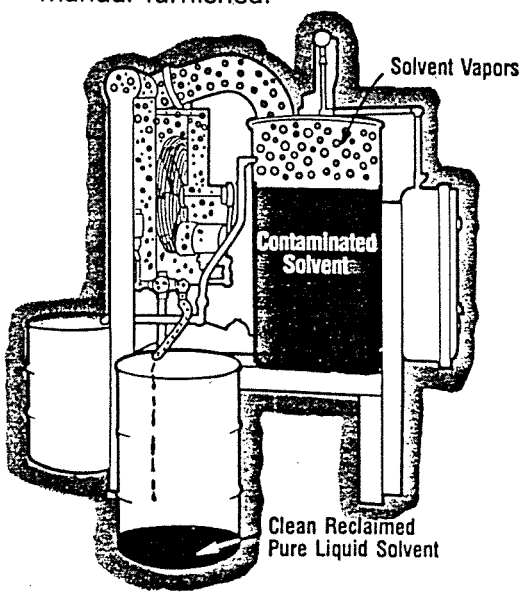
24. Stainless steel construction
25. Electric self-contained boiler package complete with insulated enclosure and heater
26. Temperature, viscosity data recordings
27. Temperature-viscosity alarms
28. Water separator
29. Portable powered transfer pump - fast initial fill

FINISH ENGINEERING CO. INC.
921 Greengarden Blvd. Erie, Pennsylvania 16501
Telephone 814/455-4478 • TWX 510-696-6816

HOW IT WORKS...

Fin-E-Co 380 is basically a single stage batch type distillation process treating dirty, unusable, contaminated solvents, reprocessing them and delivering an extremely high grade, solvent.

1. **Contaminated Solvent** - Taken from any industrial wash-up operation. Typically brought to the Model 380 in drums or fed from holding tank.
2. **Heat Source** - Reclaimer utilizes existing plant steam supply up to 100 PSI or Model 380 comes complete with electric powered boiler for converting plant water into steam.
3. **Heat Chamber** - Contaminated solvent is pumped into distillation chamber preset level and temperature controls regulate and transfer the steam heat activity.
4. **Boiling Point** - Steam is transmitted into jacket-type tubes around the lower section of the chamber's circumference Solvent departs the contamination in vapor form.
5. **Agitator** - To maintain motion of contamination within heat chamber and to avoid build-up of residue on internal wall, a scraper-agitator device, connected by vertical shaft to electric drive, continuously rotates inside the heat chamber.
6. **Condensing** - Escaped heated solvent vapors rise and leave heat chamber. Vapors enter condensing zone and encounter uniform pattern of fan-cooling forced air. Vapors are cooled and gravity-leave condenser zone as liquid solvent into clean container.
7. **Protection** - To assure equipment life, Fin-E-Co Reclaimer involves several safety features, such as level indicators, air flow switches, NEMA 7 motors and wiring, residue viscosity indicators, pressure relief sensing, temperature regulators, and explosion proof control box. Complete operating and instruction manual furnished.



Solvent Distillation Equipment

Model LS-15†

(15 gallons per batch)

Capabilities

- Distills 15 gallons per shift
- Processes alcohols, ketones, aromatics, chlorinateds and aliphatics
- Recovery rates 80-95%
- 99% plus purity
- Residue remains behind in Teflon-coated STILPAN

Features

- 7-10 cents operating costs per gallon
- Minimal operator involvement
- Explosionproof electricals meet NEMA 7 (Class 1, Group D, Division 1) standards
- Teflon-coated high-conductivity single-piece boiling chamber
- Electric cast encapsulated heating coil (no heat transfer fluid)
- Distillate gravity feed to external receive tank
- Pushbutton operating light

Utility Requirements

Continuous Use

- 1.65 Kw at 110V/1/60 or 50 Hz
- ¼ to ½ GPM condensing water

Optional Use

- 1 to 3 GPM cooling coil water

Specifications

Height:	36 inches	914.4 mm
Width:	44 inches	1117.6 mm
Depth:	30 inches	762 mm
Weight:	425 pounds	191.25 kg

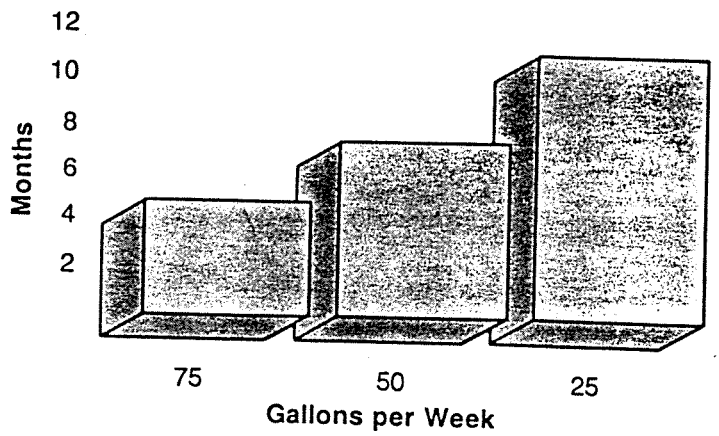
* Du Pont registered trademark
† Patent applied for

Safety relief valve
Toggle clamp
Nylon cover insulator
15 Gallon fully insulated boiling chamber
Teflon coating
STILPAN
Ceramic fiber insulation
Electric cast encapsulated heating coil
Tamper-proof thermostat controls
Heavy duty legs
Nylon spill guard
Stainless steel distillate line
Setable temperature controller
"Shell and tube" water condenser
Vapor temperature indicator
On/off switch with indicator light
Teflon sealed sight glass
Flexible hose
Grounding clamp

Options

- Vacuum attachment for high-boiling solvents (320-500°F)
- Flow switch interlock
- Non-explosionproof electric timer
- Temperature shut-off with timer
- External venting system

Payback Chart



Typical Operating Costs: 7-10¢ per gallon.

FINISH ENGINEERING CO., INC.
921 Greengarden Road • Erie, Pennsylvania 16501-1591 U.S.A.
Phone 814/455-4478 • TWX 510-696-6816

F84-146-QP

Revised 1/85
Armond Torre

STONE INDUSTRIAL DIVISION
J. L. CLARK MANUFACTURING COMPANY

LS-15 SUPPLEMENTARY INSTRUCTIONS

A. TIMERS

1. TC 1. Controls the water flow to the Condenser. The condenser should be programmed to be ON Sunday through Thursday from 3:30 P. M. until 4:00 A. M.

2. TC 2. Controls the water flow for cool down of the distillation chamber. This unit should be programmed to be ON Sunday through Thursday from 4:00 A. M. until 5:30 A. M.

3. TC 3. Controls the heater. The heater should be programmed to be ON Sunday through Thursday from 3:30 P. M. until 1:30 A. M.

4. ONE WEEK TIME CLOCK.
   This device regulates when the current is flowing through the entire system. The clock should be programmed to be ON from Sunday at 2:00 P. M. until Friday at 12:00 P. M. (NOON)

B. OTHER ELECTRICAL DEVICES

1. POWER SWITCH.
   Controls the electricity used for this system. It should remain in the ON POSITION at all times, with the exception of Maintenance Repairs.

2. OVERRIDE SWITCHES
   These switches are located on TC 1, TC 2, and TC 3 just below the clock dial. When the unit is running on its programmed mode, these switches should be located in the center of its respective electrical boxes. If it is desired to have the unit function at another time, simply push the switch to the right and that particular function will now be performed. To reactivate the programmed system, push the switch back to the left.

3. AMMETER.
   This meter is located above the main power box and is a safety back-up device which allows the operator to tell when the heating unit is in the ON POSITION. The other indication that the heating unit is running is the red light on the front of the still. If this light is burned out, the ammeter will still be measuring at 15 AMP.

4. WATER FLOW METERS.
   Located on the copper pipes leading into the still. The one on the left measures the condenser's rate and should be set at 20 GPH. The meter on the right measures the cool down flow and should be set at 80 GPH.

Revised 1/85
Armond Torre

STONE INDUSTRIAL DIVISION
J. L. CLARK MANUFACTURING COMPANY

LS-15 SUPPLEMENTARY INSTRUCTIONS

C. CHARGING THE STILL

1. Make sure that the chamber of the still is FREE from waste form the previous run. IF IT IS NOT, clean it

2. Assure that there is 1 inch of reciprocating compressor oil in the chamber of the still.

3. Place the Teflon coated pan into the chamber of the still.

4. Fill the Teflon coated pan with 2-3 five gallon buckets of waste adhesive. NOT NOT FILL WITH MORE THAN 15 GALLONS OF MATERIAL. In order to ease the charging process, use the bucket rack to allow the bucket to drain unattended.

5. Replace the cover on top and clamp it securley. Make sure that the pressure relief valve is free to operate.

D. REMOVING THE DISTILLAND

1. Once the distillation has been completed, the remaining waste (distilland) must be removed.

2. Make sure the temperature of the waste is not too hot, but rather has just about begun to solidify. If you wait until it has solidified, it will be impossible to remove.

3. Release the clamps and, while wearing gloves, remove the Teflon coated pan by lifting straight up and out of the chamber.

4. Carefully pour the warm waste (distilland) into a clean 55 gallon drum.

Revised 1/85
Armond Torre

STONE INDUSTRIAL DIVISION
J. L. CLARK MANUFACTURING COMPANY

LS-15 SUPPLEMENTARY INSTRUCTIONS

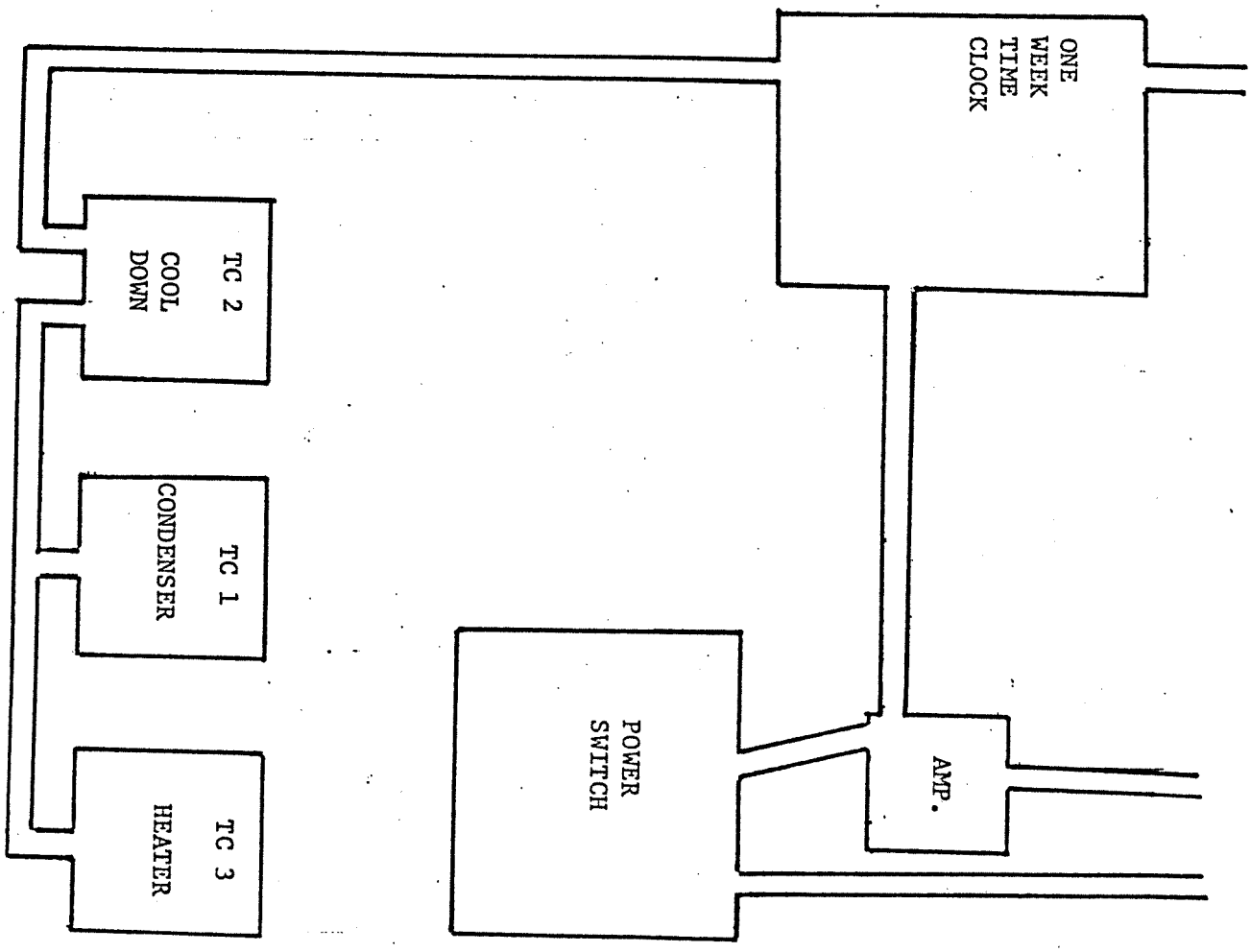
E. ACCUMULATING THE WASTE

Whenever a hazardous waste has been generated and is being stored for future disposal, it is the law that the drum must be properly labelled. As a new drum is being first filled, come to the lab and ask for a HAZARDOUS WASTE SHIPPING LABEL.

This label, shown below, must be completely filled out. Usually, the only items you must fill out or have filled out for you is the Accumulation Start Date; the date that the drum first starts to be filled. Remove or spray paint over all other labels on the drum.

ALSO-- A "FLAMMABLE SOLID" label must be on the drum.

Revised 1/85
Armond Torre



February 2, 1988

Letter from Stone Industrial indicating name change

STONE
INDUSTRIAL
a member of the CLARCOR precision products group

February 2, 1988

CERTIFIED MAIL

Ms. Emily Troyer
State of Maryland
Office of Environmental Programs
Waste Management Administration
Hazardous Waste Division
201 West Preston Street
Baltimore, Maryland 21201

Dear Ms. Troyer:

Effective October 1, 1987, J. L. Clark Manufacturing Company changed its name to CLARCOR. We will still be referred to as Stone Industrial, a member of CLARCOR Precision Products Group.

This letter is to inform you that for future reference our hazardous waste manifests and labels will show the new name CLARCOR. Our EPA I.D. number (MDD 058594920) will remain unchanged.

Therefore, our correct name and mailing address should read:

Stone Industrial
CLARCOR Precision Products Group
51st Avenue and Cree Lane
College Park, Maryland 20740

Sincerely,

STONE INDUSTRIAL
CLARCOR Precision Products Group

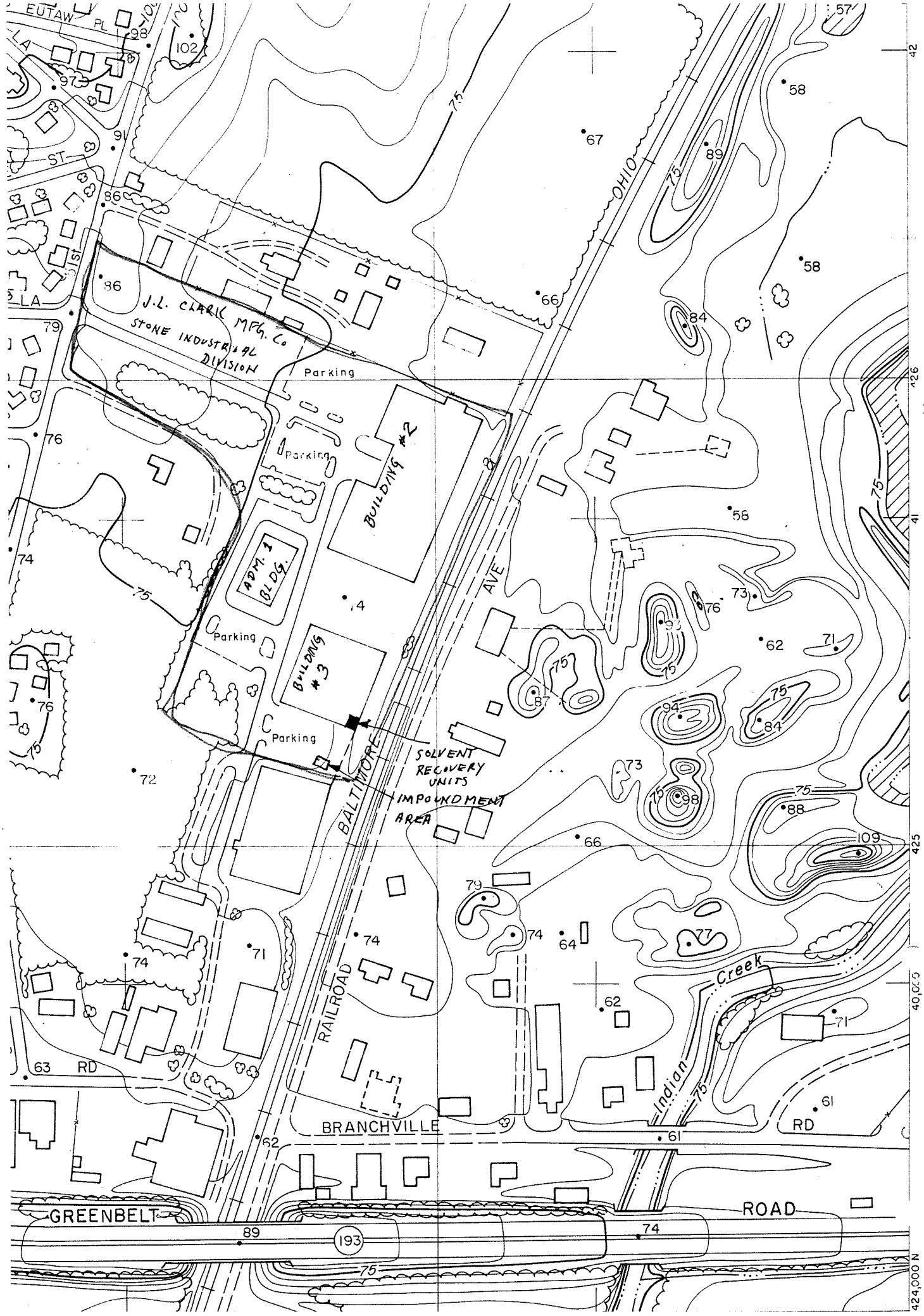
John B. Hager

John B. Hager
Chief Chemist

JBH:jgm

cc: Tom Battle, State of Maryland
Timothy E. Kartisek, General Manager Stone Industrial

51st Avenue & Cree Lane
College Park, Maryland 20740
301/474-3100
FAX: 301/345-2367


EUTAW PL
ST
J.L. CLARK MFG. Co
STONE INDUSTRIAL DIVISION
Parking
Parking
Parking
Parking
BUILDING #2
ADM. 1 BLDG.
BUILDING #3
SOLVENT RECOVERY UNITS
IMPOUNDMENT AREA
BALTIMORE
AVE
OHIO
RAILROAD
Indian
Creek
BRANCHVILLE
RD
RD
GREENBELT
ROAD
193
75
426
425
40,000
424,000 N

April 1, 1988

RCRA Inspection Report

REGION
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection J.L. CLARK
MDD 05 859 4920

DATE: 4/1/88

FROM: Vernon Butler, Environmental Engineer
DELMARVA/DC/WV RCRA Enforcement Section (3HW15)

TO: FILE

RU:
Chief
DELMARVA/DC/WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING THESE VIOLATIONS.

Attachment

Victoria P. Barrett
5/17/88

State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 W. Preston St., Balto. MD 21201

DHS Inspection Form
Generators/TSD Facilities

YR MO DY

TIME

EPA ID Number

TELEPHONE

Owner/Operator _____ Facility Name _____

Address _____ Zip _____

Description of Work Activity _____

I. Generators

A. Description (10.51.03.01-.03)

1) Does the Facility generate or has it accumulated those quantities of hazardous waste described in 10.51.02.05 C.? _____Yes, _____No.
2) Has the facility obtained an EPA identification number? _____Yes, _____No.
3) Describe the amount of waste generated. (day, week or month) _____
4) Under which category is the waste(s)?
   _____Ignitable _____Reactive _____Corrosive
   _____EP Toxic _____RCRA Listed

B. Manifest (10.51.03.04)

1) Is Maryland manifest system in operation for off-site shipment? _____Yes, _____No.
2) Is TSD Facility to receive DHS identified by _____Name, _____Address, _____EPA ID Number?
3) Is alternate facility identified? _____Yes, _____No.
4) Is generator identified by _____Name, _____Address, _____Telephone Number, _____MD/EPA ID Number?
5) Is each transporter identified by _____Name, _____EPA ID Number, _____Maryland Certification Number?
6) Is waste property described? _____Yes, _____No.
7) Is shipment date marked? _____Yes, _____No.
8) Is quantity of waste described by _____Unit of Weight, _____Volume?
9) Are containers to be loaded identified by _____Type, _____Number?
10) Is proper certification noted and signed by generator? _____Yes, _____No.
11) Are adequate copies available for operator, transporter and TSD? _____Yes, _____No.

C. Pre-Transport Requirements (10.51.03.05)

1) Is each container marked with date accumulation began? _____Yes, _____No. If yes, has any waste been stored over 90 days? _____Yes, _____No. How much _____
2) Are containers in good condition? _____Yes, _____No. If no, explain _____
3) Are containers properly labeled? _____Yes, _____No.
4) Does generator have approved emergency contingency plan? _____Yes, _____No.

D. Recordkeeping and Reporting (10.51.03.06)

1) Does the generator have: copies of all signed manifests from the previous three years? _____Yes, _____No; copies of each Annual Report and Exception Report? _____Yes, _____No.
2) Does the generator retain, for a period of three years, all wastes analyses? _____Yes, _____No.
3) Has the generator filed Exception Reports as required by 10.51.03.06 C? _____Yes, _____No.

II. Treatment, Storage, Disposal (TSD)

A. Site characterization (10.51.05.02)

1) Facility Type
   _____Thermal Treatment _____Biological Treatment
   _____Recycling/Recovery _____Land Treatment
   _____Waste Oil _____Incineration
   _____Chemical Treatment _____Landfill Operation
   _____Physical Treatment _____Below Ground Tanks
   _____Open Pile _____Other _____
   _____Surface Impoundment _____
   _____Drums _____
   _____Above Ground Tank(s) _____
2) Does facility generate DHS? _____Yes, _____No.
3) Does facility have waste analysis plan? _____Yes, _____No. If yes, are the procedures of that plan being followed? _____Yes, _____No.
4) Can facility personnel identify DHS being handled? _____Yes, _____No.
5) Can facility personnel confirm that DHS received equal those on manifest form? _____Yes, _____No.
6) Is there a 24-Hour surveillance system to monitor active portion of facility? _____Yes, _____No. If No, is there an artificial or natural boundary? _____Yes, _____No. Is there a means to control entry? _____Yes, _____No. Is there a restricted access sign posted? _____Yes, _____No.
7) Does facility have: _____emergency equipment inspection log, _____written schedule for inspections, _____security devices, operating & structural prevention equipment?
8) Have facility personnel completed classroom/on-site training? _____Yes, _____No. Are records maintained of: _____Job titles/names of employees _____job descriptions, _____Type/amount of continuing training?
9) Are general requirements for Ignitable, Reactive or Incompatible Wastes as required in 10.51.05.02 H addressed? _____Yes, _____No.

B. Preparedness and Prevention (10.51.05.03)

1) Facility has the following equipment? _____Internal communication/alarm system for on-site personnel, _____device for summoning emergency assistance, _____adequate fire control equipment, water, & suppression chemicals, _____list of aforementioned equipment.
2) Does facility have adequate area for emergency movement? _____Yes, _____No.

C. Contingency Plan and Emergency Procedures (10.51.05.04)

1) Does facility have an approved contingency plan for:
   _____Personnel to implement emergency procedures to fire, explosions, and unplanned releases to air, soil and water?
   _____Responding emergency units to provide assistance during emergency situations?
   _____A list of emergency equipment needed to cope with situation?
2) Are emergency response coordinators listed by name, address, & phone number? _____Yes, _____No.
3) Is there an evacuation plan if recommended? _____Yes, _____No.
4) Are emergency coordinators available on twenty-four hour basis? _____Yes, _____No.

D. Manifest System, Recordkeeping, and Reporting (10.51.05.05)

Facility has a written operating record which contains the following information:

1) _____description & quantity of DHS received.
2) _____method & date of DHS treatment, storage, or disposal.
3) _____location & quantity at each DHS location in facility.
4) _____detailed records & results of waste analysis & treatability tests performed.
5) _____detailed operating summary reports.
6) _____description of emergency incidents that required implementation of contingency plan.
7) _____records & results of inspections of emergency equipment. TSD systems & hazardous waste areas.
8) Has facility retained, for at least 3 years, copies of all manifests? _____Yes, _____No.

E. Groundwater Monitoring (10.51.05.06)

1) Has facility implemented a groundwater monitoring program? _____Yes, _____No, _____N/A.
2) Are samples from the groundwater monitoring system being analyzed according to the groundwater sampling and analyses plan? _____Yes, _____No.
3) Is this plan set up in accordance with 10.51.05.06 C? _____Yes, _____No.
4) Has groundwater quality assessment program been prepared? _____Yes, _____No.
5) Are proper groundwater sampling and analyses records kept? _____Yes, _____No.
6) Are the necessary reports on groundwater monitoring information being forwarded to the Secretary? _____Yes, _____No.
7) Do the reports match the facility records? _____Yes, _____No.

F. Closure, Post-closure, and Financial Requirement (10.51.05.07 & .08)

1) Does the facility have an approved closure plan that meets the financial requirements? _____Yes, _____No.
2) For surface impoundments, land treatment, and landfills, does the facility have an approved post-closure plan that meets the financial requirements? _____Yes, _____No.
3) Does facility maintain liability insurance? _____Yes, _____No.

G. Container Management (10.51.05.09)

1) Are all containers: (a)_____ in good condition, i.e., no signs of leakage, corrosion, or any other deterioration/deformation; (b)_____ lined or made of compatible material such that hazardous wastes placed into them will not result in reaction or corrosion; (c)_____sealed during storage.
2) Are storage areas for hazardous waste containers inspected by owner/operator at least once a week? _____Yes, _____No.
3) Is an inspection log maintained? _____Yes, _____No.
4) Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? _____Yes, _____No.
5) Are incompatible wastes placed in separate containers? _____Yes, _____No.
6) Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? _____Yes, _____No.

H. Tanks (10.51.05.10)

1) Are all tanks in good condition, i.e., no signs of leakage, corrosion, or any other deterioration: _____Yes, _____No.
2) Are uncovered tanks operated to ensure a minimum of two feet of freeboard? _____Yes, _____No.
   If not, is tank equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of top 2 ft. of the tank? _____Yes, _____No.
3) Are tanks with continuous inflow of hazardous waste equipped with a means to stop this inflow (e.g., waste feed cut-off system or by-pass to a standby tank)? _____Yes, _____No.
4) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into tank used for storage or treatment? _____Yes, _____No.
5) Are daily inspections conducted for discharge control equipment (e.g., by-pass systems, waste feed cut-off systems and drainage systems)? _____Yes, _____No.
6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? _____Yes, _____No.
7) Is the level of waste in the tank checked at least once each operating day? _____Yes, _____No.
8) Is (are) the tank(s) inspected weekly to detect corrosion or leaking of fixtures or seams? _____Yes, _____No.
9) Are the results of these inspections recorded in an inspection log or summary? _____Yes _____No.
10) Are ignitable or reactive wastes stored in tanks? _____Yes, _____No. If yes:
    a) Is the waste treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of materials no longer meets the definition of ignitable or reactive wastes under Parts 261.21 or 261.23 of the RCRA Regulations? _____Yes, _____No.
    b) Is waste stored or treated in such a way that it is protected from material or conditions which may cause the waste to ignite or react? _____Yes, _____No.
    c) Is owner/operator of a facility which treats or stores ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Association's (NEPA's) buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the "Flammable and Combustible Code—1977"? _____Yes, _____No.

I. Surface Impoundments (10.51.05.11)

1) Is two feet of freeboard maintained in the surface impoundment? _____Yes, _____No.
2) Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity? _____Yes, _____No.
3) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment? _____Yes, _____No.
4) Is the freeboard level inspected daily? _____Yes, _____No.
5) Is the surface impoundment, including dikes and vegetation, inspected weekly to detect leaks, deterioration, or failures in the impoundment? _____Yes, _____No.
6) Are the results of these inspections recorded in an inspection log or summary? _____Yes, _____No.
7) Are ignitable or reactive wastes stored in a surface impoundment? _____Yes, _____No. If yes:
   a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under Parts 261.21 or 261.23 of the RCRA Regulations? _____Yes, _____No.
   b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided? _____Yes, _____No.

J. Waste Pile (10.51.05.12)

1) Is wind dispersal of the pile controlled? _____Yes, _____No, _____Not Needed.
2) Are additions to the pile being analyzed prior to adding them to the pile? _____Yes, _____No.
3) Is hazardous waste leachate or runoff collected? _____Yes, _____No. Is the pile protected from precipitation and run-on? _____Yes, _____No.
4) Are ignitible or reactive wastes protected from materials or conditions that might cause it to ignite or react? _____Yes, _____No, _____N/A.
5) Are incompatible wastes hauled in a manner as to assure separation? _____Yes, _____No, _____N/A.

K. Land Treatment (10.51.05.13)

1) Will the use of land treatment result in the waste being less hazardous or non-hazardous? _____Yes, _____No.
2) Is run-on diverted away from the active portion of the facility? _____Yes, _____No. Is run-off from the active portion of the facility collected? _____Yes, _____No.
3) Has the proper waste analyses been peformed? _____Yes, _____No.
4) If food chain crops are to be grown on the active portion of the facility has the necessary documentation required been provided? _____Yes, _____No.
5) Has the owner/operator written and implemented an unsaturated zone monitoring plan? _____Yes, _____No.
6) Have the additional requirements for a closure and post-closure plan been addressed? _____Yes, _____No.
7) Are ignitable or reactive wastes immediately incorporated into the soil? _____Yes, _____No.
8) Are incompatible wastes hauled according to 10.51.05.13 I? _____Yes, _____No.

L. Landfills (10.51.05.14)

1) Is run-on diverted away from the facility's active portions? _____Yes, _____No.
2) Is run-off collected from the landfill's active portions? _____Yes, _____No.
3) Has a hazardous waste determination been made on the run-off? (Identification and Listing of Hazardous Waste) _____Yes, _____No.
4) Is the landfill managed so as to control wind dispersal? _____Yes, _____No.

5) Are the following items maintained in the operating record: _____on a map, the exact location and dimensions, including depth, of each cell with respect to permanently surveyed benchmarks? _____contents of each cell and approximate location of each hazardous waste type within the cell?
6) Are bulk, non-containerized or waste containing free liquids placed in the landfill? _____Yes, _____No. If yes: _____ is a leachate collection system available to remove leachate?, and _____is the liquid stabilized or treated physically or chemically prior to disposal?
7) Are empty containers crushed flat or shredded before burial in the landfill? _____Yes, _____No.
8) Are containers holding liquid wastes (or waste containing free liquids placed in the landfill? _____Yes, _____No. If yes, describe containers on comments below.
9) Are ignitable or reactive wastes placed in a landfill? _____Yes, _____No. If yes: _____Is the waste treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste? _____Are incompatible wastes segregated in different landfill cells?

N/A

M. *Incinerator/Thermal Treatment (10.51.05.15 & .16)*

1) Prior to burning waste not previously incinerated or thermally processed, does the operator conduct waste analysis for the following:
_____heating value of the waste;
_____halogen content and sulfur in the waste;
_____concentrations of lead and mercury unless documented data is available which show these elements not to be present?
2) Are instruments related to combustion and emission control monitored at least every 15 minutes? _____Yes, _____No.
3) Is the stack plume observed visually at least hourly for color and opacity? _____Yes, _____No, _____N/A.
4) Is the incinerator or thermal process and associated equipment inspected daily for leaks, spills and fugitive emissions? _____Yes, _____No.
5) Is all of the above information documented in the facility's operating record? _____Yes, _____No.

N/A

N. *Chemical, Physical and Biological Treatment (10.51.05.17)*

1) Are all treatment processes or equipment in good condition, i.e., no signs of leakage, corrosion or any other deterioration? _____Yes, _____No.
2) Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop the inflow? (e.g., waste feed cutoff system or bypass system to a standby containment device) _____Yes, _____No.
3) Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? _____Yes, _____No.
4) Is this information recorded in the facility's operating record? _____Yes, _____No.
5) Are daily inspections conducted for discharge control equipment (e.g., bypass systems, waste feed cutoff systems, drainage systems and pressure relief systems)? _____Yes, _____No.
6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) daily? _____Yes, _____No.
7) Are construction materials of the treatment process or equipment and the immediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration? _____Yes, _____No.
8) Are the results of these inspections recorded in an inspection log or summary? _____Yes, _____No.
9) Are ignitable or reactive wastes placed in a treatment process? _____Yes, _____No. If yes:
_____Are wastes treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive wastes under Section 261.21 or 261.23 of the RCRA Regulations?
_____Are wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react?
10) Are incompatible wastes kept from being placed in the same treatment process or equipment? _____Yes, _____No.

N/A

O. *Permit Requirements (10.51.07)*

1) Does the facility have a DHS permit for its activity? _____Yes, _____No.
If no, has the facility submitted an application for a DHS permit? _____Yes, _____No.
2) List any special Permit requirements that are not in full compliance.

Comments: V.L. CLARK manufacturing co. [illegible] to CLARCOR in [illegible] 1987. [illegible]

Inspector's Name: [illegible] Title: [illegible]

Facility Location: [illegible]

Facility Rep. present during inspection: [illegible] Title: [illegible]

May 3, 1988

RCRA Inspection Report

REGION

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection J.L. CLARK
MDD05 859 4920

DATE: 5/3/88

FROM: Vernon Butler, Environmental Engineer
DELMARVA/DC/WV RCRA Enforcement Section (3HW15)

TO: FILE

RU: Chief MAY 0 3 1988
DELMARVA/DC/WV RCRA Enforcement Section (3HW15)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING THESE VIOLATIONS.

Attachment

CLARK, J.L. MFG
CO Stone Ind
Gen
CHOS → 6

State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Follow-up Date 02/22/88

Facility Name: J.L. CLARK (CLARCOR)

Remarks: 51st AVENUE & CREE [illegible]
College Park, MD. 20740
MDD058594920

This facility was inspected by this [illegible] On January 13, 1988 and advised to develop a contingency plan and emergency procedures as required under Article 10.51.05.04. To [illegible] the hazardous waste drums with the date accumulation date begun, to inspect the hazardous waste storage area once a week, to [illegible] an inspection log, to give a class room on-site training to personnel and to file the notification of hazardous waste activity form.

On the above date a follow up inspection was conducted by this [illegible] and noted the following:

1. The facility has filed the hazardous waste activity notification form for changing its name from J.L. CLARK to CLARCOR on February 10, 1988.
2. The contingency plan and emergency procedures has been developed and approved by this [illegible]. Also, the facility is advised to [illegible] the [illegible] any time [illegible] during emergency. A class room on site training was given to personnel on [illegible] 1988.
3. The hazardous storage area is inspected once a week. The inspection log was maintained, [illegible] and hazardous waste [illegible] is [illegible].

J.L. Clark (CLARCOR) appears to be [illegible] with [illegible] hazardous waste regulations.

Observer: [illegible] Person Interviewed: [illegible]

DHMH 3879

July 19, 1988

Notice indicating Interim Status withdrawn by Maryland

NOTICE

FACILITY NAME: Clark, J.L. Mfg. Co. Stone Industries

EPA ID NUMBER: MDD 058594920

PRESENT C1105 CODE: 6 PRESENT C305 CODE: S

CORRECT C1105 CODE: 6 5 CORRECT C305 CODE: blank

The current status of the above facility is:

( ) Certified Closure

( ) State confirms facility is not a TSD facility

(X) State confirms facility is less than 90 day storage

( ) Closure not necessary

(X) Facility converted to Generator status w/o full closure

( ) Facility is a Transporter

ADDITIONAL INFORMATION ON THE STATUS OF THIS FACILITY:

Interim status withdrawn by Maryland as "protective filer" - 5/86

- Code as generator 1101 -

Jennifer Juri
Signature of Reviewer

7/19/88
Date

October 1989

Environmental Priorities Initiative Preliminary Assessment of Stone Industrial

ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT
OF
STONE INDUSTRIAL

COLLEGE PARK, MARYLAND

MD-291

OCTOBER, 1989

Prepared By: Maryland Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway
Baltimore, Maryland 21224

Prepared For: U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

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1.0 INTRODUCTION

1.1 AUTHORIZATION

The Maryland Department of the Environment, Hazardous and Solid Waste Management Administration (MDE/HSWMA) performed this study under Environmental Protection Agency (EPA) Contract No. MD088-0526-0408.

1.2 SCOPE OF WORK

MDE/HSWMA was contracted to perform an Environmental Priorities Initiative Preliminary Assessment (EPI/PA) at the subject site. This EPI/PA will assess the potential for releases of hazardous waste and hazardous waste constituents from Solid Waste Management Units (SWMU's) identified at the subject site.

1.3 EXECUTIVE SUMMARY

An Environmental ~~Priorities Initiative Assessment~~ (EPI/PA) conducted at the subject site found that the subject site is currently operating under the name Stone Industrial a member of the CLARCOR precision products group. Previously the facility operated under the name of J.L. Clark Inc. Attached please find a "CERCLIS Correction Form" showing that the facility name can now

be corrected (Appendix A).

The facility has been the site for the manufacture of customated spiral-wound products since 1950. The primary hazardous waste streams generated by the facility are hazardous solid waste from the distillation of spent polyester adhesive and flammable waste solid from bagliners in drums. Also, prior to 1988, flammable waste liquid from spent polyester adhesive was generated. Currently all spent polyester adhesive is distilled to recovery the solvent.

In addition to the hazardous waste streams described above, Stone Industrial also generates a waste water, used for cooling the blades on the cutting machine, waste stream which is handled as non-hazardous waste.

Waste management practices and handling of waste material appears to be in compliance with RCRA regulations. Also, waste storage and handling areas of the facility were found to be in generally good condition, however the following areas of concern should be addressed in the next RCRA inspection, which include:

1. The waste water, used to cool the blades on the cutting machine, should be analyzed for all the priority pollutants to ensure it is a non-hazardous waste.

2. The adhesive temporarily stored, (next to the winding machines in Building #3), in drums while it is being recycled should be labeled with the exact contents of the drums and the waste accumulation dates.

These observations have been referred to MDE/HSWMA Enforcement Division, for follow-up action (Appendix F).

A "No Further Remedial Action Planned" (NFRAP) CERCLA Status is recommended for this facility.

2.0 THE SITE

2.1 LOCATION

The Stone Industrial Site is located in College Park, Prince Georges County, Maryland. The site can be found on the Beltsville 7.5 minute quadrangle map at a latitude 39^0 00' 45" N and longitude 70^0 55' 25" W. The facility can be accessed from the Capital Beltway (I-95) by using the Baltimore Avenue (Rt. 1) exit (exit 25) and proceeding to Hill Road. Go east onto Hill Road until Rhode Island Road. Proceed south on Rhode Island Road for approximately one mile to Cree Lane. The site is situated at 51st Avenue and Cree Lane (Figure 1).

2.2 LAYOUT

The facility occupies approximately 18 acres of land in Prince Georges County, Maryland. The facility consists of an office, and two plant buildings located east of the office (Figure 2; Photo # 1, 2, & 3). The buildings are labeled, #1 the Office Building, #2 the Paper Winding Building and #3 the Plastic Winding Building. There are mown grass areas in between and around the buildings on-site.

2.3 OWNERSHIP HISTORY

The site was first purchased by Landrum Platt in the 1930's. The spiral wound tubing facility was moved from Washington D.C. to the College Park site in 1950. Prior to this the land was undeveloped.

2.4 SITE USE HISTORY AND FACILITY PROCESSES

The facility is in the business of manufacturing spiral-wound products. This involves the manufacturing of both plastic tubing, paper tubing and customated stoneized tubing.

The winding of plastic tubing is performed in building #3. In this operation the plastic is wound and bounded together by a polyester adhesive. This adhesive is reused for approximately two days. The adhesive is then distilled on-site to recover the

solvents. The waste solid (still bottom) accumulated from the distillation process is hazardous waste. Prior to 1989, the liquid from the spent adhesive was not distilled to recover the solvents but disposed of off-site.

The customated stoneized tubing and paper tubing process is performed in building #2. The paper tubing is wound and bounded together by a non-hazardous starch base paste. No hazardous waste is generated by the paper wound tubing process. To stoneize the tubing the paper tubes are impregnated with a blend of epoxy and phenolic resins and then cured in an oven. The resins are recycled, therefore no hazardous waste is generated by the stoneized tubing process either. The resins have been recycled for approximately four years. Prior to 1985, the resins were mixed together and disposed of off-site.

2.5 PERMIT AND REGULATORY HISTORY

The facility operates under EPA ID No. MDD058594920. The facility is a generator of hazardous waste and has submitted "Hazardous Waste Generation and Shipment Reports" to MDE/HSWMA since 1976 (See Appendix E).

Stone Industrial maintains two (2) Air Management permits for each of the manufacturing buildings.

2.6 REMEDIAL ACTION TO DATE

On August 22, 1989 one of the underground Methyl Ethyl Ketone (MEK) storage tanks was overfilled on the Stone Industrial site. The tank was located near the northwestern corner of building #2. The spill migrated across the boundary of the Stone Industrial property onto the property owned by the College Park Public Works Department. The spill continued eastward across the Public Works property where it formed a one foot inch pool at the eastern border of the property adjacent to the B&O Railroad tracks. According to the report provided by Stone Industrial approximately 450 gallons of MEK was released. The spill was promptly reported to the U.S. EPA and MDE/HSWMA. The site was inspected by personnel from these departments. EA Engineering, Science and Technologies (EA) was contracted to access the extent of contamination and clean-up the site.

After an initial soil clean-up was conducted by EA, soil samples were collected to assess if any MEK still remained in the soil. A second soil clean-up was conducted to excavate more of the contaminated soil on the College Park Public Works property near the B&O Railroad. The effected MEK spill areas were covered with clean fill. Currently, EA ~~Engineering, Science and Technologies~~ is generating a final report regarding the MEK spill. To date this report has not been submitted to MDE/HSWMA.

Stone Industrial has removed all three of their MEK underground storage tanks since the overfill in August 1989.

No other remedial action has taken place to date.

3.0 ENVIRONMENTAL SETTING

3.1 WATER SUPPLY

The site is served water from the Washington D.C. municipal water supply. Within a three (3) mile radius of the site, there are approximately 12 domestic wells. Assuming 3.8 persons per dwelling, there are approximately 46 residents obtaining their water from these wells (Reference #1). There are no surface water intakes located within a three (3) miles of the site (Reference #2).

3.2 SURFACE WATER

The nearest surface water is approximately 1000 feet east of the site. This surface water is part of the Indian Branch. Surface water entering the Indian Branch will flow south and enter the Anacostia River which empties into the Potomac River. These rivers are used for recreational purposes.

The slope of the facility is less than 3% and the terrain between the site and the Indian Branch is also less than 3%, as

estimated from the U.S.G.S. Topographic Map of the area (Figure 3).

3.3 HYDROGEOLOGY

3.3.1 GEOLOGY

The site is located near College Park, Maryland which is in the Coastal Plain Physiographic Province, just east of the Fall Line. The area is characterized by rolling hills with topographic reliefs of approximately 100 feet to the west due to less easily eroded Intrusive rocks. To the east, the topographic relief is approximately 50 feet because of less resistant coastal plain sediments. The occurrence of the Laurel migmatite marks the Fall Line between the Coastal Plain Province and the Piedmont Province to the west.

The site lies geologically on the Wicomico Formation. Among the lithologies that are observed in the area are the Quaternary-age Pamlico Formation, the Quaternary-age Wicomico Formation, the Cretaceous-age Patapsco Formation, the Cretaceous-age Patuxent Formation and the Laurel Migmatite (Figure 4).

The Pamlico Formation is described as gravel, sand and silt from stream deposits and alluvium. The Wicomico Formation is characterized by gravel, sand and silt deposited in upland streams. The Patapsco Formation is characterized in this area by dark gray,

massive clay containing lignitized wood that is overlain by varicolored sand and clay. The entire Formation is approximately 300 feet thick. Underlying this is the Patuxent Formation and is described as interbedded fine white, pink or yellow sand and white or iron-stained clay. The Formation has an estimated thickness of 100 feet (Figure 5). The Laurel migmatite is intensely granitized schist mixed with impure granite (Reference #3).

3.3.2 SOILS

The site lies on the Sunnyside-Urban Land complex and exhibits less than a 3% slope. It consists of deep, well-drained soils that developed in fine sandy sediments which contain reddish clay. The permeability of this soil ranges between 2.0 to 6.3 inches per hour (Reference #4).

Within a three (3) mile radius of the site, there are four soil associations; the Manor-Glenleg Association, the Beltsville-Leonardtown-Chillium Association, the Cristiana-Sunnyside-Beltsville Association, and the Bibb-Tidal Marsh Association. The first is described as deep, well-drained and somewhat excessively drained nearly level to very steep soils of the Piedmont Province. The second is described as moderately deep, well-drained to poorly drained, dominantly gently sloping soils that have a compact subsoil. The third is deep, level to steep, well drained , sandy and clayey soils that have a compact subsoil. The last association is described as poorly drained soils of the

flood plains and soils in marshes that are subject to tidal flooding (Reference #4).

3.3.3 GROUNDWATER

Surface water runoff within a three (3) mile radius of the site has the opportunity to percolate into the Wicomico Formation. The surface pathways of runoff are generally to the east (Figure 3). The water that does not percolate, evaporated or is used by plant matter will enter the Anacostia River by way of the Indian Creek. To the west of the site, at the Fall Line, several fractures trace along the contact with sedimentary rocks and the underlying members. These fractures allow for the rapid transmission of water.

Within a three (3) mile radius of the site, there are approximately 12 domestic wells drilled since 1969 (Reference #1). The nearest of which is approximately 1.2 miles north of the site. The most exploited aquifer in the area is in the Patuxent Formation. Well depths vary from 205 to 340 feet deep with yields ranging from 100-200 to 1200 gallons per minute (Reference #5). The hydraulic conductivity of this aquifer is estimated to lie between 10^{-1} and 10^{-2} cm per second (Reference #6).

3.4 POPULATION DISTRIBUTION

The population within a three (3) mile radius of the Stone Industrial site is approximately 58,000 residents (Reference #7). Since there are 12 domestic wells, it is estimated that there are 46 people on groundwater in the area, assuming 3.8 persons are served by each well (Reference #1).

3.5 LAND USE

The site is located in commercial/residential area of Prince Georges County. To the northeast of the site is the College Park Public Works to the southeast is a car body repair shop, Maaco, to the east of the site is residential houses. The B&O Railroad tracks run along the eastern border of the site. To the west of the site is 51st Avenue. Beyond 51st Avenue and surrounding the whole site are residential houses.

3.6 CLIMATE AND METEOROLOGY

The site is approximately 100 feet above sea level. Normal precipitation, measured over a 30 year period is 42.72 inches/year, although rainfall measured 26.81 inches in 1988. Average temperature, measured over the same period, is 56.0 degrees Fahrenheit. These readings were obtained at the College Park Measuring Station (Reference #8). The climate is influenced by the yearly fluctuations of the Jet Stream patterns and the daily

fluctuations of wind patterns over the Chesapeake Bay. The net precipitation in the area for 1988 was 0.81 inches. The 1-year/24-hour rainfall is 2.5 inches.

3.7 SENSITIVE ENVIRONMENTS

There are approximately three (3) separate freshwater wetlands within a one (1) mile radius of the site (Reference #7).

4.0 WASTE TYPE AND QUANTITY

There are two main hazardous waste streams generated by the facility as described in the facility's 1988 Waste Generation and Shipment Report as "Hazardous Solid Waste from distillation of spent polyester adhesive" and "Waste flammable solid from bagliners in drums: of pressure sensitive acrylic adhesive polyethylene bag containing residue" (Appendix E). In addition to these waste streams, prior to 1989, another waste describe as "Waste Flammable Liquid from spent polyester adhesive used in manufacturing of plastic tube winding" was generated (Appendix E). Currently the solvents are recovered from the spent polyester adhesive through a distillation process conducted on-site.

In addition to the hazardous waste mentioned above the facility generates a non-hazardous waste water, used for cooling the blades on the cutting machine. This waste is accumulated for a period of time in an underground storage tank and than disposed

of off-site.

4.1 HAZARDOUS SOLID WASTE FROM DISTILLATION OF SPENT POLYESTER ADHESIVE AND WASTE FLAMMABLE SOLID FROM BAGLINERS

Stone Industrial generated 17100 pounds of waste from the distillation of spent polyester adhesive (still bottom), and 8100 pounds of bagliners in 1988. Both of these wastes are now shipped together. Currently, up to July 3, 1989, Stone Industrial has shipped 25400 pounds of the still bottoms and bagliners. The source of this waste stream and the various components are given below:

1. Methyl Isobutyl Ketone (1%)
2. Methyl Ethyl Ketone (1%)
3. n-butanol (1%)
4. toluene (1%)
5. Polyester adhesive (75-90%)
6. Polyester bags (1-20%)

The solvents mentioned above are used in a polyester adhesive used to bind plastic wound tubing. The bag liners are generated from inside the drums of polymer resins used also in the adhesive.

Both the still bottom and the bagliners are contained together and transported by Ecoflo Inc., of North Carolina.

4.2 WASTE FLAMMABLE LIQUID FROM SPENT POLYESTER ADHESIVE

Stone Industrial generated approximately 35100 pounds of spent solvent in 1988. According to Stone Industrial, the solvent is now recovered in a distillation process. Currently, no spent solvent waste, only still bottoms, has been generated in 1989.

The spent solvent waste is generated from the adhesive used to bind the plastic wound tubing together. In 1988 this waste was transported by Marisol, Inc., of Middlesex, New Jersey.

4.3 WASTE COOLING WATER

According to information provided by Stone Industrial, water is used to cool the blades of a cutting machine. This water is reused and periodically pumped to an underground storage tank. The waste water is transported and tested by Dupont and handled as a non-hazardous waste.

An analysis of the waste water was provided by Stone Industrial (Appendix ~~D~~ E). This appears to be a general analysis done on waste water. A specific analysis testing for all priority pollutants should be conducted on the waste water to ensure that it is non-hazardous.

5.0 FIELD TRIP REPORT

5.1 PERSONS CONTACTED

1. John B. Hager
   Chief Chemist
   Stone Industrial
   College Park, Maryland
   (301) 474-3100

2. Nigussie Retta
   Public Health Engineer
   MDE/HSWMA
   Baltimore, Maryland
   (301) 631-3440

3. Herb Meade
   Chief of Enforcement
   MDE/HSWMA
   Baltimore, Maryland
   (301) 631-3440

4. Jim Chilcote
   Environmental Inspector
   MDE/HSWMA
   Baltimore, Maryland
   (301) 631-3440

5.2 SUMMARY

On September 8, 1989, Ms. Marie Fisher, Mr. Sesh Lal and Mr. Phill Kortis of MDE/HSWMA, CERCLA Projects Pre-Remedial Division, visited the Stone Industrial site. MDE/HSWMA personnel were met at the facility by Mr. John Hager, Chief Chemist and Timothy Kartisek, General Manager. MDE/HSWMA personnel proceeded to interview Mr. John Hager about both past and present waste management practices at the facility. Also, during this interview a questionnaire prepared by MDE/HSWMA was filled out (Appendix B).

5.3 SITE OBSERVATIONS

5.3.1 SOLID WASTE MANAGEMENT UNITS (SWMU's)

5.3.1.1 SATELLITE STORAGE OF FLAMMABLE SPENT SOLVENTS

The adhesive used to bind the plastic wound tubing is temporarily stored next to the winding machines in building #3 (Photo # 6 & 7). The adhesive is recycled for approximately two (2) days. At this time it is taken to the rear of building #3 where the solvents are recovered through a distillation process. The temporary storage of the adhesive containing spent solvents appears to be in good condition. The drums were not enclosed by a berm to confine any spilled material. There were no apparent cracks in the cement where the drums are stored. The area around

the drums were found to relatively dry, however there was evidence of minor spills and runovers.

During the site inspection it was noted that the labeling of the drums containing spent solvent adhesive could be improved by better clarifying the contents of the drums and by putting the accumulation dates of the waste on the drums.

5.3.1.2 DISTILLATION OF SPENT SOLVENT ADHESIVE

The facility utilizes a distiller on the site to recover solvents from the spent solvent adhesive that is used to bind the plastic wound tubing (Photo # 8 & 9). The distiller is located in the rear of building #3. The still bottom from this process is considered to be hazardous waste. The still bottom is collected in drums at the site of the distiller, here it is temporarily stored until it is moved to building #2 for transportation. The distiller area is confined by a berm to contain any spilled solvents or still bottom. This area appeared to be in good condition.

It was noted during the site inspection that drums containing accumulated still bottoms could be labeled better by clarifying the contents of the drums and by putting the accumulation dates of the waste.

5.3.1.3 STORAGE AREA OF HAZARDOUS WASTE BEFORE TRANSPORTATION

Filled drums of ignitable still bottom and waste polyester resin bagliners are stored in the shipping room, located in the rear of building #3 (Photo # 11). The drums are stored on metal racks. The floor of the room is concrete, it was observed to be dry with no apparent cracks. The area appears to be in good condition with no evident stains indicating a recent spill in this area. The drums were found to be in good condition. They were found to be properly sealed and labeled.

5.3.1.4 CHEMICAL ROOM

The chemical room is located in building #3. This room was used to store a variety a chemicals including, pressure sensitive adhesive, approximately 7-8 drums of polyester adhesive, 1,1,1 trichloroethene (used in the stoneizing process), methylene chloride and acetone (Photo #10). The room is concrete with no apparent cracks. The general housekeeping in this room could be improved upon by organizing the items within the room. There is no evidence of resent spillage of chemicals in this area.

Currently, the room has been cleaned of the polyester adhesive and other waste material, and used to temporarily store MEK product, since all the underground storage tanks were removed. A permanent place to store the MEK product is currently being arranged.

5.3.1.5 SITE OF THE MEK SPILL

In August 1989, one of the underground MEK tanks was overfilled, and approximately 450 gallons of product were lost (Photo #15 & 16). The spill migrated onto the adjoining College Park Public Works property. EA Engineering, Science, and Technologies was contracted to access the extent of the contamination and clean-up the spill area. Currently MDE/HSWMA LUST division investigated the site and is overseeing the clean-up.

Leaking underground storage tanks

At the time of the site inspection drums containing MEK contaminated soil were stored on a asphalt parking lot next to Building #2, awaiting off-site disposal.

6.0 RECOMMENDATIONS

Waste management practices and handling of waste material at the Stone Industrial site appears to be in compliance with existing RCRA regulations. Also, waste storage and handling areas of the facility were found to be in a generally good condition. Two observations, concerning the confirmation of the waste cooling water as non-hazardous and the proper labeling of drums in the satellite storage of flammable spent solvents in Building #3, should be addressed in the next RCRA inspection. These observations have been referred to MDE/HSWMA Enforcement Division,

for follow up action.

A No Further Remedial Action Planned CERCLA Status is recommended for this facility.

7.0 REFERENCES

1. Maryland Department of Environment, Division of Residential Sanitation, well applications processed since 1969. Report No. D130WMA1.

2. Maryland Department of the Environment, Water Supply Division, Greg Anderson, October 1989.

3. Geologic Map of Prince Georges County, U.S.G.S., E. CLOOS, 1951.

4. Soil Survey, Prince Georges County, Maryland, United States Department of Agriculture, Soil Conservation Service, April 1967.

5. The Quality and Natural Quantity of Groundwater in Maryland, Maryland Department of Natural Resources. Water Resource Administration, 1987.

6. Freeze and Cherry. Groundwater, 1979.

7. Census Map, Prince Georges County, Maryland. D.O.T., 1980.

8. University of Maryland, State Climatology Office, Gauin Hunt, October 1989.

9. U.S. Department of the Interior Fish and Wildlife Services, National Wetlands Inventory, Beltsville and Washington East Quadrangle, April 1981.

APPENDIX A
CERCLIS CORRECTION FORM

CERCLIS CORRECTION FORM

TO: Site Support Section (3HW26)

FROM:
Site Investigation Section (3HW23)

SITENAME: Clark, J.L. Mfg. Co. Stone Industrial DSN: MD-291

ACTION TO BE TAKEN:

A. CHANGE OF ADDRESS (List address as it should appear in CERCLIS)

B. ENTER NEW INFORMATION

Type of Action		DATE	LEAD (S or F)	PRIORITY
Discovery	[ ]			
PA	[ ]			
SI	[ ]			
EPI	X		S	N

C. CHANGE OF PRIORITY

Change/add priority to:

	M	H	N
PA	[ ]	[ ]	[ ]
	R	D	N
SI	[ ]	[ ]	[ ]

D. MERGE/DELETE
Explain:

E. OTHER

Change of Name:

From: Clark, J.L. Mfg. Co. Stone Industrial
To: Stone Industrial

SIS
11/88

APPENDIX B
MDE/HSWMA EPI-PA QUESTIONAIRE

CERCLA ENVIRONMENTAL PRIORITY INITIATIVE
PRELIMINARY ASSESSMENT

I. GENERAL SITE VISIT INFORMATION FORM

Stone Industrial (MD-291) 51st Avenue and Cree Lane
A. Site Name/Site Number B. Street (or other identifier)

College Park MD 20740 Prince George's
C. City D. State E. Zip Code F. County Name

G. Site Operator Information

1. Name John B. Haser 2. Telephone Number (301) 474-3100

3. Street 51st Avenue 4. City College Park 5. State MD 6. Zip Code 20740

H. Site Description

Manufacture of spiral wound tubing products

I. Type of Ownership

__ 1.Federal __2.State __3.County __4.Municipal X 5.Private

J. RCRA Activities Declared

X 1.Generator __2.Transporter __3.Treatment

__4.Storage __5.Disposal

K. RCRA Regulatory Status

X 1. Permitted Facility
__2. Part B Permit Application Submitted
__3. Part B Permit Application in Preparation
__4. Part B Permit Issued

L. Environmental Permits

a. RCRA/CHS TSD ____
b. NPDES/STATE DISCHARGE PERMIT ____
c. Solid Waste Disposal Permit ____
d. Oil Handler/Facility Permit ____
e. Air Management Permits X
f. Others ____

REMARKS: Air Management permits, one for each of the manufacturing buildings

M.

1. Principal Inspector Name
   Marie Fisher
2. Title
   Environmental Specialist III
3. Organization
   CERCLA Pre-Remedial Division
4. Telephone No.
   (area code and No.)
   (301) 631-3440

N. Inspection Participants/Title/Telephone No.

1. Marie Fisher / Environmental Specialist / (301) 631-3440
2. Sash Gak / Public Health Engineer / (301) 631-3440
3. Phill Kortis / Geologist / (301) 631-3440
4.
5.

II. GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? X Yes __No

   a. If yes, EPA I.D. No. 0 5 8 5 9 4 9 2 0
      If no, explain._____

Waste Analysis

2. Does facility maintain a copy of the waste analysis plan at the facility? __Yes __No

   a. If yes, does it include:

      1. Parameters for which each waste will be analyzed? __Yes __No
      2. Test methods used to test for these parameters? __Yes __No
      3. Sampling method used to obtain sample? __Yes __No
      4. Frequency with which the initial analyses will be reviewed or repeated? __Yes __No
      5. (For offsite facilities) waste analyses that generators have agreed to supply? __Yes __No
      6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including: __Yes __No

         a. Procedures to be used to determine the identity of each movement of waste. __Yes __No
         b. Sampling method to be used to obtain __Yes __No

3. Waste Information (See Individual Worksheets)
Waste Name/Classification/Generating process at location:

1. Waste Flammable solid from baglinero in drums: of pressure sensitive acrylic adhesive polyethylene bag containing resins. Generated in building #3, when making adhesive for the plastic wound tubing.
EPA Hazardous Waste Code: D001

2. Solid waste from distilation of spent polyester adhesive. Generated from the distilation of the adhesive in building #3.
EPA Hazardous Waste Code: F005

3. Prior to 1989 - Waste flammable Liquid from spent polyester adhesive used in manufacturing of plastic tube winding in Building #3. Currently spent polyester adhesive is distilled to recover the solvents.
EPA Hazardous Waste Code: F005 & F002

General Inspection Requirements

4. Does the owner/operator maintain a written schedule at the facility for inspecting?

   a. Monitoring equipment? X Yes __No
   b. Safety and emergency equipment? X Yes __No
   c. Security devices: X Yes __No
   d. Operating and structural equipment? X Yes __No
   e. Types of problems of equipment: X Yes __No

      1. Malfunction X Yes __No
      2. Operator error X Yes __No
      3. Discharges X Yes __No

5. Does the owner/operator maintain an inspection log? X Yes __No

   a. If yes, does it include:

      1. Date and time of inspection? X Yes __No
      2. Name of inspector? X Yes __No
      3. Notation of observations? X Yes __No
      4. Date and nature of repairs or remedial action? X Yes __No

   b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) X Yes __No

Personnel Training

6. Does the owner/operatormaintain personnel training records at the facility? X Yes __No

   How long are they kept? _____

   a. If yes, do they include:

      1. Job title and written job description of each position? X Yes __No
      2. Description of type and amount of training? X Yes __No
      3. Records of training given to facility personnel? X Yes __No

Requirements for Ignitable, Reactive, or Incompatible Waste

7. Does facility handle ignitable or reactive wastes? __Yes X No

   a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static,

electrical, or mechanical), spontaneous ignition(e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are containers leaking or corroding? __Yes X No

c. Is there evidence of heat generation from incompatible wastes? __Yes X No

Section B - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? __Yes X No

a. If yes, does the owner/operator retain copies of all manifests? __Yes __No

1. Are the manifests signed and dated and returned to the generator? __Yes __No
2. Is a signed copy given to the transporter? __Yes __No

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? __Yes X No

a. If yes, is it accompanied by a shipping paper? __Yes __No

1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? __Yes __No
2. Is a signed copy given to the transporter? __Yes __No

3. Does the owner/operator keep a written operating record at the facility? X Yes __No

a. If yes, does it include:

1. Description and quantity of each hazardous waste received? X Yes __No
2. Methods and dates of treatment, storage, and disposal? X Yes __No
3. Location and quantity of each hazardous waste at each location? X Yes __No
4. Cross-references to manifests/shipping papers? X Yes __No
5. Records and results of waste analyses? X Yes __No
6. Report of incidents involving implementation of the contingency plan? X Yes __No
7. Records and results of required inspections? X Yes __No
8. Monitoring or testing analytical data? X Yes __No

9. Closure cost estimates and, for disposal facilities, post-closure cost estimates? X Yes __No

4. Does the facility submit a annual report? X Yes __No
Date of last report 1988.

a. If yes, do reports contain the following information:

1. EPA I.D. number? X Yes __No
2. Date and year covered by report? X Yes __No
3. Description/quantity of hazardous waste? X Yes __No
4. Treatment, storage, and disposal methods? X Yes __No
5. Monitoring data? X Yes __No
6. Most recent closure and post-closure cost estimates? X Yes __No
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? X Yes __No
8. Certification signed by owner/operator? X Yes __No

5. Does the facility submit to the State of Maryland and the USEPA reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? __Yes __No

6. If reports of releases have been developed explain:

In August 1989, MEK was overfilled from an underground storage tank. Approximately 450 gallons of MEK product was lost. Currently, the MDE/HSWMA LUST Division is overseeing the investigation and clean-up of the spill.

III. ENVIRONMENTAL AUDIT INSPECTION

A. SITE NUMBER MD-291

B. INSPECTION DATE 09-08-89

C. HAZARDOUS WASTE (Liquiod or Solid)

1. Liquid + Solid YES
2. _____ NO
3. X DISPOSAL
4. _____ SEE PART IV

D. CHEMICAL

1. X YES
2. _____ NO
3. _____ DISPOSAL
4. _____ SEE PART IV

E. OIL OR GASOLINE

1. _____ YES
2. X NO
3. _____ DISPOSAL
4. _____ SEE PART IV

F. STORAGE

1. X CHEMICAL
2. _____ CHS
3. _____ OIL OR GASOLINE
4. _____ SEE PART IV

G. TANKS

1. X UNDERGROUND
2. _____ ABOVE GROUND
3. _____ PERIODIC TESTING
4. _____ SEE PART IV

H. LANDFILLING

1. _____ YES
2. X NO
3. _____ PERMIT
4. _____ SEE PART IV

I. TRANSFORMERS NA

1. _____ PCB
2. _____ OIL FILLED
3. _____ STORAGE
4. _____ SEE PART IV

J. SEWAGE

1. _____ SEPTIC
2. X MUNICIPAL
3. _____ ABANDONED SEPTIC
4. _____ SEE PART IV

K. WATER SUPPLY

1. _____ PRIVATE
2. ___X___ PUBLIC
3. _____ SEE PART IV

L. DISCHARGE

1. _____ YES
2. ___X___ NO
3. _____ PERMIT
4. _____ SEE PART IV

M. SEDIMENT CONTROL

1. _____ YES
2. ___X___ NO
3. _____ PERMIT
4. _____ SEE PART IV

N. AIR EMISSIONS

1. _____ YES
2. _____ NO
3. ___X___ PERMIT
4. _____ SEE PART IV

O. ON SITE WATER MONITORING SYSTEM

1. _____ YES
2. ___X___ NO
3. _____ SEE PART IV

P. SAMPLES

1. ___X___ YES
2. _____ NO
3. _____ SEE PART IV

Q. PHOTOGRAPHS

1. ___X___ YES
2. _____ NO
3. _____ SEE PART IV

R. FACILITY/SITE DESCRIPTION
(History, present usage, size, number of employees, future plans)

Stone Industrial was started in 1988 in Washington D.C. They moved to the College Park site in mid 1950's. In 1972 an addition was made to the site by adding building #2. Currently there are approximately 154 employees working at the site. In the future, there may be an addition to one of the buildings.

S. DESCRIPTION OF ANY ENVIRONMENTAL REMEDIAL ACTION IN PROGRESS:

On August 22, 1989 one of the underground MEK tanks was overfilled and approximately 450 gallons of product was lost. The spill migrated onto the adjoining College Park Public Works property before it was contained. EA Engineering, Science, and Technologies was contracted to access the extent of contamination and clean-up the site. The proper authorities were notified of the spill promptly after it happened. At the time of MDE's inspection on 9-8-89 drums of contaminated (MEK) soil were awaiting transportation.

IV. SOLID WASTE MANAGEMENT AREA
(To be filled out for each area).

Area name and location in facility:
Building #3. Chemical Room

Waste names/volumes: Variety of Chemicals, including pressure sensitive adhesive, aproximately 7-8 drums of polyester adhesive, 1,1,1 trichloro ethane, Methylene Chloride, and Acetone.

Condition of area, evidence of environmental release, general housekeeping:
Fair-Good Could have better organization of items in the room. Floor has some stains on it.

Is there sufficient space to allow unobstracted movement of personnel and equipment: Yes

Photos description log: photo #10

Potential routes of environmental impact:
None

Recommended sampling:
None

Referral to HSWMA Enforcement Program recommended for follow-up
____ Yes X No

Remarks: Currently, the room has been cleared of waste polyester adhesive and other waste and is now being used as a temporary storage place for MEK product.

IV. SOLID WASTE MANAGEMENT AREA
(To be filled out for each area).

Area name and location in facility: Building #2, storage of still bottom waste and plastic bag liners from polyester drums.

Waste names/volumes:
Spent polyester adhesive and polyethylene bags containing residue

Condition of area, evidence of environmental release, general housekeeping:
Good

Is there sufficient space to allow unobstracted movement of personnel and equipment:
Yes

Photos description log:
photo # 11

Potential routes of environmental impact:
~~Yes~~ None

Recommended sampling:
None

Referral to HSWMA Enforcement Program recommended for follow-up
____ Yes _X_ No

Remarks:

IV. SOLID WASTE MANAGEMENT AREA
(To be filled out for each area).

Area name and location in facility: Underground MEK storage tank located near the northwestern corner of Building #2

Waste names/volumes:

MEK

Condition of area, evidence of environmental release, general housekeeping: Area was cleaned of contaminated soil and had plastic over top of the effected areas, during MDE's inspection.

Is there sufficient space to allow unobstracted movement of personnel and equipment: Yes

Photos description log:

photo # 15 + 16

Potential routes of environmental impact:

Groundwater & surface water runoff

Recommended sampling:

EA Engineering Science & Technologies handling clean-up.

Referral to HSWMA Enforcement Program recommended for follow-up

X Yes ____ No

Remarks: MDE/HSWMA LUST Division is currently investigating the spill area and overseeing the clean-up by EA. Currently, all of the underground MEK storage tanks have been removed.

IV. SOLID WASTE MANAGEMENT AREA
(To be filled out for each area).

Area name and location in facility: satellite collection point of polyester adhesive in Building #3.

Waste names/volumes:
Polyester adhesive, used for approximately two days before collected and moved to be distilled.

Condition of area, evidence of environmental release, general housekeeping: Fair, general house keeping could be improved.

Is there sufficient space to allow unobstracted movement of personnel and equipment: Yes

Photos description log:
photo # 6 + 7

Potential routes of environmental impact:
None

Recommended sampling:
None

Referral to HSWMA Enforcement Program recommended for follow-up
____ Yes X No

Remarks:
Drums used to collect the polyester adhesive could be labled more clearly, with the waste name and accumulation dates. Also, drums could be confined by a berm.

IV. SOLID WASTE MANAGEMENT AREA
(To be filled out for each area).

Area name and location in facility: Distilation of solvents, and temporary storage of still bottoms in rear of building #3

Waste names/volumes:
Bonded polyester adhesive, distilled still bottoms become hazardous waste.

Condition of area, evidence of environmental release, general housekeeping: Good

Is there sufficient space to allow unobstracted movement of personnel and equipment:
Yes

Photos description log:

photo #8 + 9

Potential routes of environmental impact:

None

Recommended sampling:

None

Referral to HSWMA Enforcement Program recommended for follow-up
____ Yes X No

Remarks: Drums accumulating still bottoms should be labled with hazardous waste lables, and accumulation dates of the waste.

V. WASTE INFORMATION WORKSHEET
(To be filled out for each facility waste)

WASTE NAME: Spent polyester adhesive

PROCESS GENERATING THE WASTE: Waste flammable liquid from spent polyester adhesive used in manufacturing of plastic tube winding.

HOW HAS FACILITY CLASSIFIED THE WASTE?
HAZARDOUS X (If so, list waste code) NON-HAZARDOUS ____
HOW HAS FACILITY MADE THIS DETERMINATION?
TESTING ____ PROCESS KNOWLEDGE X

ARE ANY TEST RESULTS AVAILABLE?
YES ____ (If so look at) NO ____

WASTE GENERATION RATE: 3500 pounds in 1988

DISPOSAL PROCEDURE:
CURRENT Spent polyester adhesive is distilled to recover the solvents
PAST Waste transported by Marisol, Inc. of Middlesex N.J.

HAVE MANIFESTS BEEN USED FOR OFF-SITE SHIPMENT?
YES X (If so, look at) NO ____

IS WASTE SUBJECT TO LAND DISPOSAL RESTRICTIONS UNDER 40 CFC 268?

NA

IS WASTE SUBJECT TO EXCLUSIONS UNDER 40 CFR 261.4?

NA

V. WASTE INFORMATION WORKSHEET
(To be filled out for each facility waste)

WASTE NAME: Hazardous solid waste from distillation of spent polyester adhesive.

PROCESS GENERATING THE WASTE: Adhesive used to bind plastic tubing

HOW HAS FACILITY CLASSIFIED THE WASTE?
HAZARDOUS X (If so, list waste code) NON-HAZARDOUS ____
HOW HAS FACILITY MADE THIS DETERMINATION?
TESTING ____ PROCESS KNOWLEDGE X

ARE ANY TEST RESULTS AVAILABLE?
YES ____ (If so look at) NO ____

WASTE GENERATION RATE: 17100 pounds generated in 1988

DISPOSAL PROCEDURE:
CURRENT Transported by Ecoflo of North Carolina
PAST ____

HAVE MANIFESTS BEEN USED FOR OFF-SITE SHIPMENT?
YES X (If so, look at) NO ____

IS WASTE SUBJECT TO LAND DISPOSAL RESTRICTIONS UNDER 40 CFC 268?

NA

IS WASTE SUBJECT TO EXCLUSIONS UNDER 40 CFR 261.4?

NA

V. WASTE INFORMATION WORKSHEET
(To be filled out for each facility waste)

WASTE NAME: Pressure sensitive acrylic adhesive polyethylene bag containing residue, waste flammable solid.

PROCESS GENERATING THE WASTE: Bagliners from drums - adhesive is used in the bonding of plastic wound tubing

HOW HAS FACILITY CLASSIFIED THE WASTE?
HAZARDOUS X (If so, list waste code) NON-HAZARDOUS ____
HOW HAS FACILITY MADE THIS DETERMINATION?
TESTING ____ PROCESS KNOWLEDGE X

ARE ANY TEST RESULTS AVAILABLE?
YES ____ (If so look at) NO ____

WASTE GENERATION RATE: 8100 pounds in 1988

DISPOSAL PROCEDURE:
CURRENT Transported by Ecoflo of North Carolina, Inc.
PAST ____

HAVE MANIFESTS BEEN USED FOR OFF-SITE SHIPMENT?
YES X (If so, look at) NO ____

IS WASTE SUBJECT TO LAND DISPOSAL RESTRICTIONS UNDER 40 CFC 268?

NA

IS WASTE SUBJECT TO EXCLUSIONS UNDER 40 CFR 261.4?

NA

CERCLA ENVIRONMENTAL PRIORITY INITIATIVE
PRELIMINARY ASSESSMENT

REPORT OF OBSERVATIONS

A. SITE NUMBER MD - 291 B. INSPECTION DATE 9/8/89

The site consists of three (3) buildings; (1) office building, (2) plastic wound tubing manufacturing building, and (3) the paper wound tubing manufacturing building. In building#3 there are three (3) Solid Waste Management Areas (SWMA), one (1) in building #2 and one (1) outside the building were 450 gallons of MEK product was spilled from an overfill.

Building #3 - Plastic wound tubing building

- MEK is added to a polymer to make an adhesive to bind the plastic wound tubing.
- The polyester adhesive is recycled and used for two (2) days.
- The polyester adhesive is temporarily stored in drums, located next to the winding machines, before it is moved to be distilled. (SWMA)
- The adhesive is distilled to recover the solvents. The still bottom from the distiller is hazardous waste.
- The still bottom is temporarily stored in drums at the distiller. (SWMA)
- In building #3 there is a chemical room where laboratory chemicals are stored, and temporary storage of MEK product.

Building #2 - Paper wound tubing building

- The adhesive used to bind the paper tubing is a starch base paste, non-hazardous.
- Also, paper tubing is stoneized, by impregnating the tube with a mixture of resins.
- The resins are recycled.
- The resins are kept warm, so they do not harden.
- A non-hazardous lubricating oil is used on the winding machines.
- A cutting machine cuts the tubes. Water is run over the blades of the machines. This water is reused, periodically pumped into a holding tank. The water is disposed of by Dupont. Non-hazardous waste.
- The still bottom waste and the plastic bag resins are stored in drums in the rear of building #2 before it is transported off-site (SWMA).

MEK overfill spill

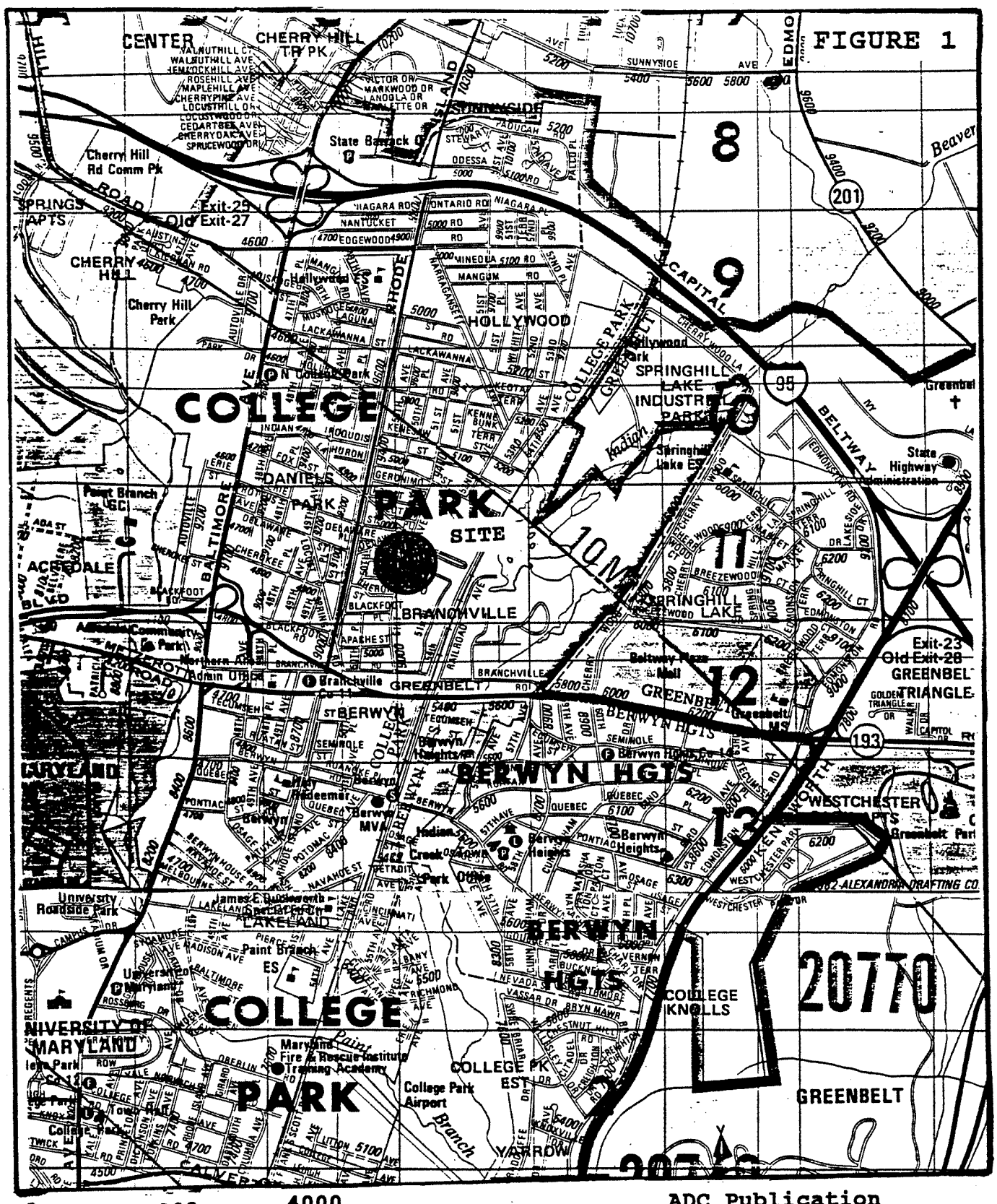
- The underground MEK tank in August of 1989 was overfilled and 450 gallons of product lost.
- The spill migrated to the adjoining Public Works property. EA Engineering Science and Technology was contracted to assess the contamination and clean up the spill area.
- Drums of contaminated soil were located on an asphalt lot on-site awaiting off-site disposal.
- Currently the MEK underground storage tanks have been removed and MEK product is stored temporarily in building #3's chemical room and also in building #2.

VI. LIST OF DOCUMENTS RECEIVED DURING SITE VISIT

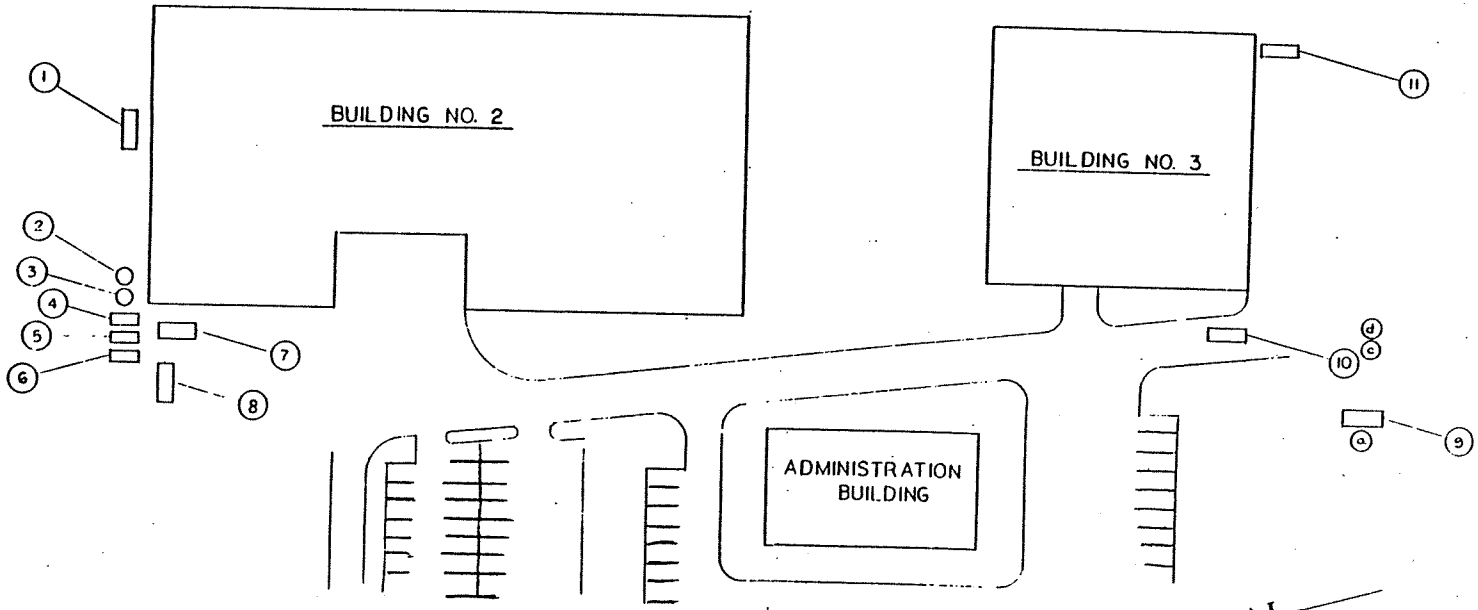
1) EA Engineering, Science and Technology "Results of Sampling Analysis at Stone Industrial Site".
2) Manifests generated in 1989.
3) Site Maps

APPENDIX C
MAPS AND SKETCHES

HIGHWAY MAP OF STONE INDUSTRIAL



SITE MAP, STONE INDUSTRIAL



REV.	LOC.	DESCRIPTION	DATE	BY
a	2A	REMOVED FROM SERVICE & DISMANTLED	6-1-85	
b	1C	CHART REFORMATED	1-15-88	MC
c	2A	TESTED 2-10-88 BY PETRO SUPPLY CO. INC. SILVER SPRING, MD.		
d	2A	BOILER CONVERTED TO GAS TANK REMOVED BY STONE & HOOVER CONTRACTING, LORTON, VA.	7-29-88	NC

TANK NO.	CAP. GAL.	CONT'S.	INSTALL'D.	REMARKS	TESTING DATES					REMOVED
1	3,000	WATER	1953							
2	750	M.E.K.	1963							
3	750	M.E.K.	1963							
4	1,500	ISO AL.	1970	Leaking < All Piping Disconnected	4-18-86					
5	1,500	ISO AL.	1970	O.K.	4-18-86					
6	1,500	ISO AL.	1970	O.K.	4-18-86					
7	10,000	2 OIL	1975							
8	8,000	WATER	1982							
(a) 9	10,000	2 OIL	1974	Scrapped	6-1-85					6-1-85
(d) 10	4,000	2 OIL	1954	Tested - OK	2-10-88					7-28/29-88
11	1,500	M.E.K.	1970							

SCALE	NONE	BRANCHVILLE TANK LOCATIONS	DRAWN BY	TORRE 12-1-83
MATERIAL			CHECKED	
AD. REQ'D.			APPROV.	
ASSEMBLY				

TOLERANCES UNLESS OTHERWISE SPECIFIED

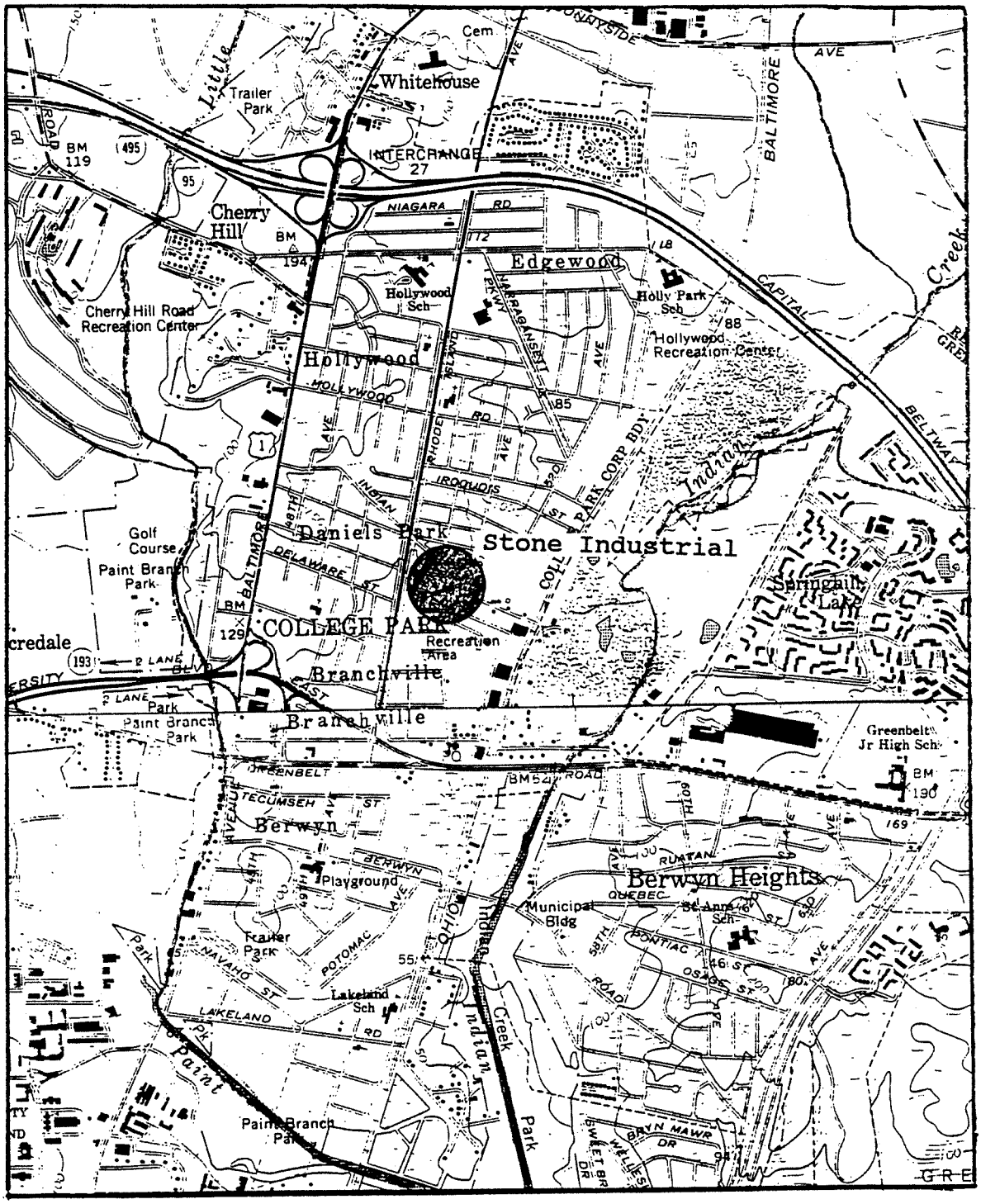
STONE INDUSTRIAL DIV

BLD-2

Figure 2

TOPOGRAPHIC MAP OF THE COLLEGE PARK AREA, MARYLAND

Figure 3



0 2000

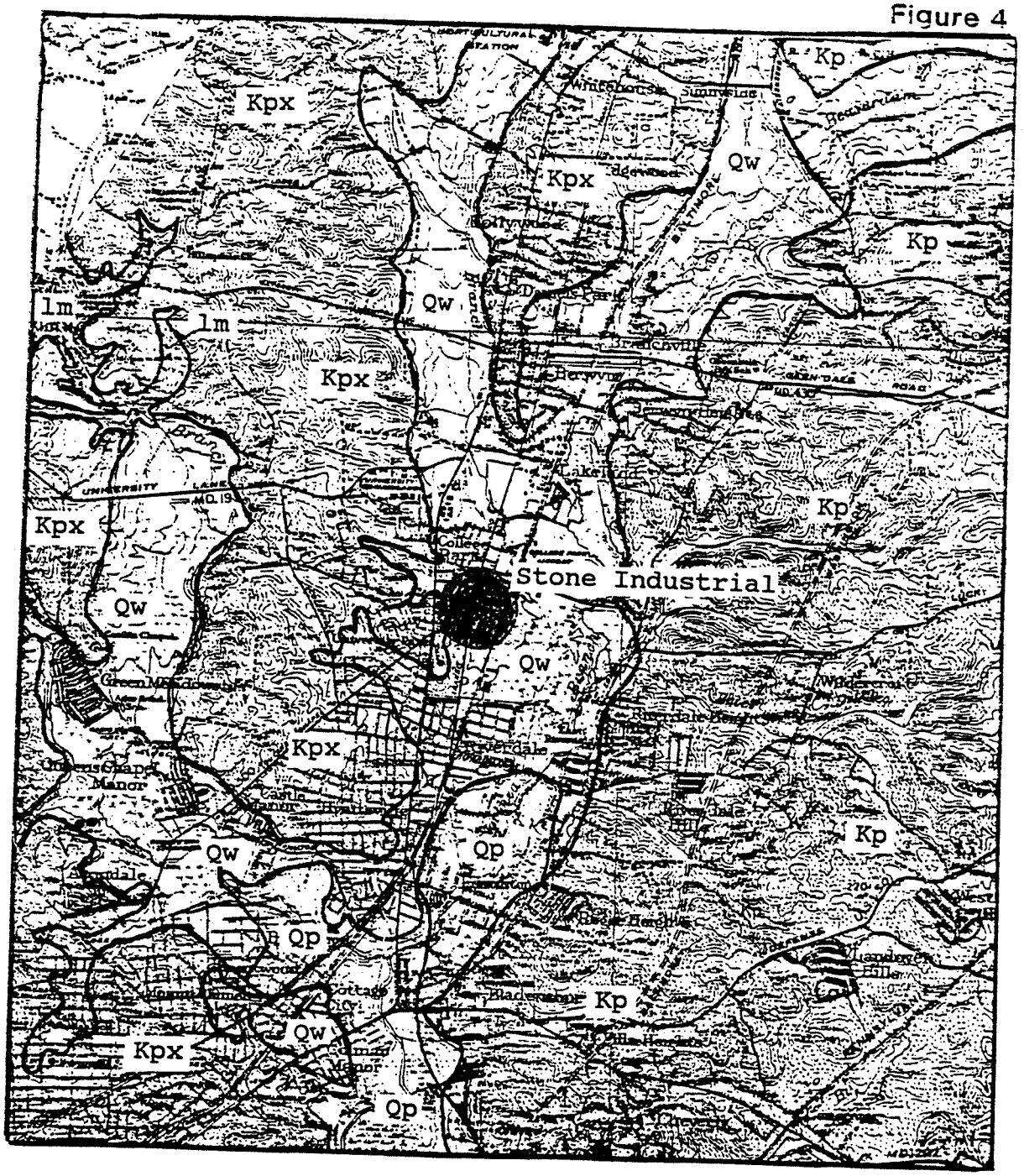
scale in feet

N

U.S.G.S. Map Revised, 1971

GEOLOGIC MAP OF WESTERN PRINCE GEORGES COUNTY, MARYLAND

Figure 4



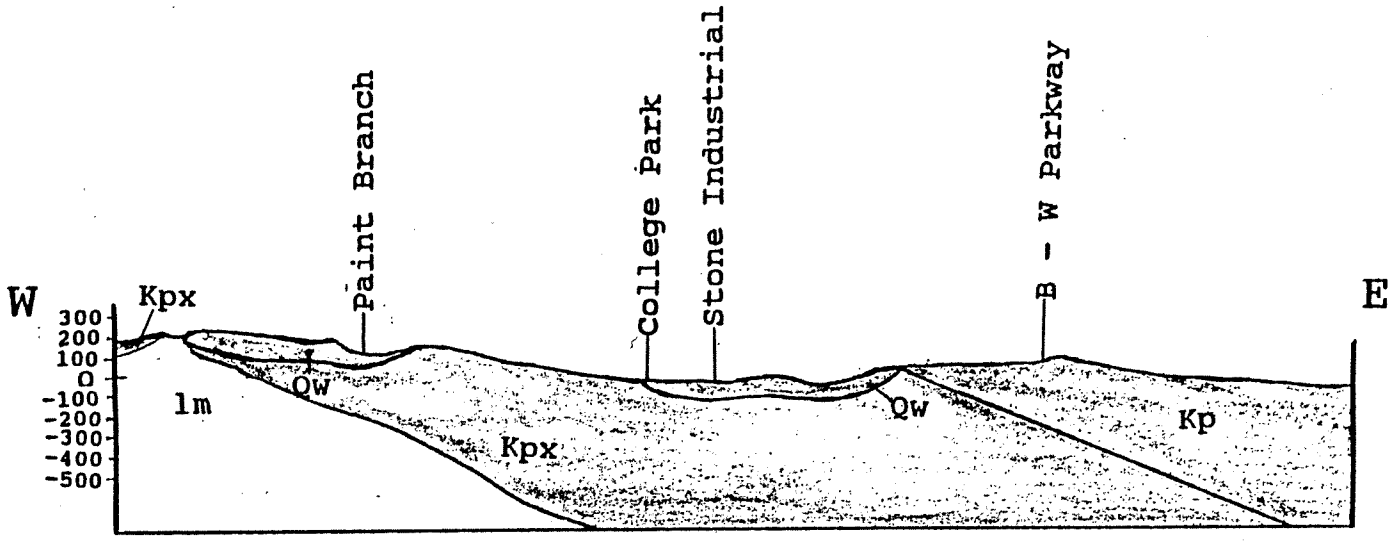
U.S.G.S. Map revised, 1951

0 1

scale in miles

N

Qp - Pamlico Formation
Qw - Wicomico Formation
Kp - Patapsco Formation
Kpx - Patuxent Formation
lm - Laurel Migmatite



GEOLOGIC CROSS-SECTION THROUGH STONE INDUSTRIAL, PRINCE GEORGES COUNTY, MARYLAND

Qw - Wicomico Formation

Kp - Patapsco Formation

Kpx - Patuxent Formation

lm - Laurel Migmatite

0 1

scale in miles

Figure 5

APPENDIX D
PHOTOGRAPH LOG

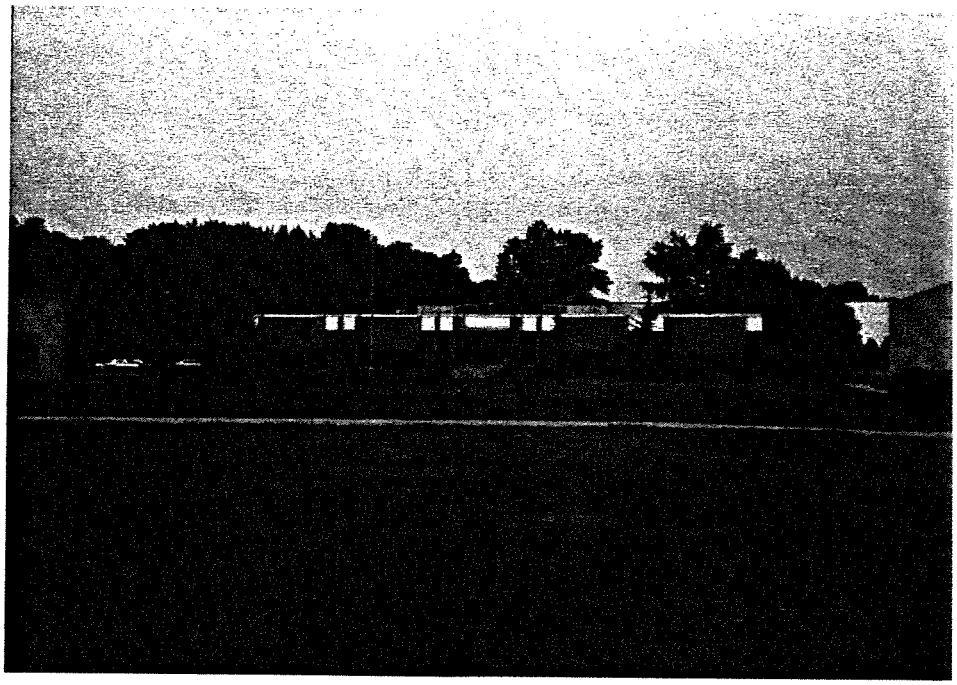


Photo #1: View of the office building, Building #1

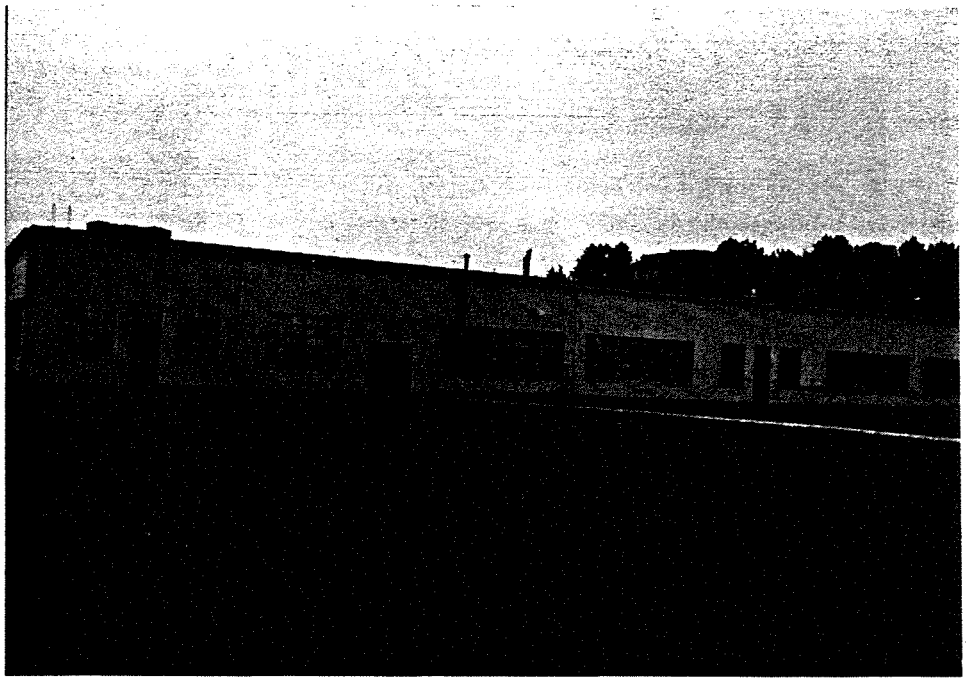


Photo #2: View of the plastic wound tubing building, Building #3.

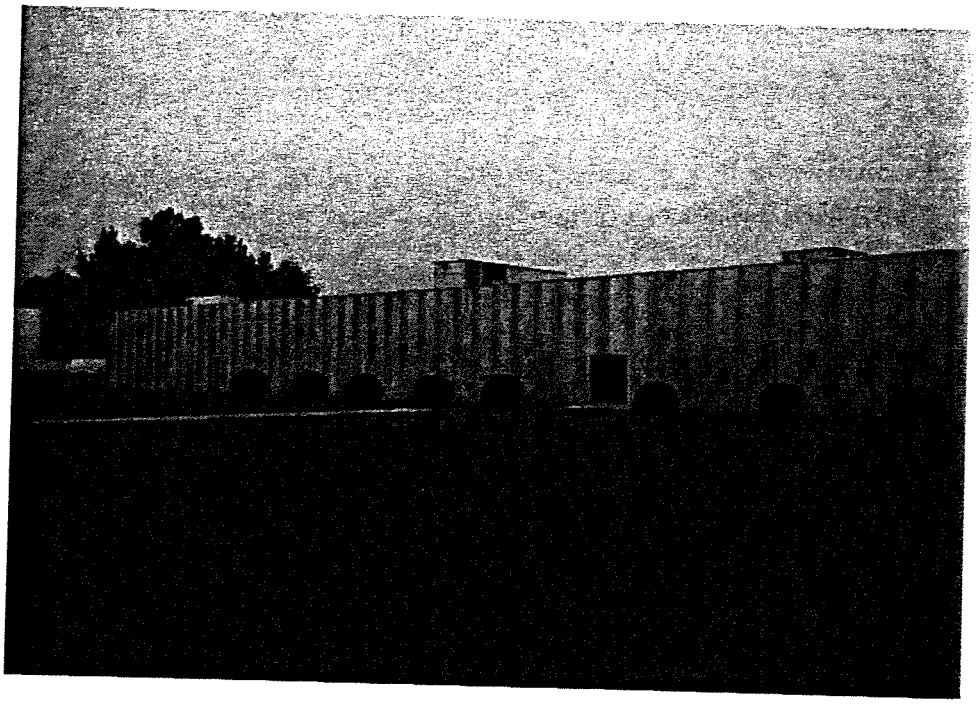


Photo #3: view of the paper wound tubing building, Building #2.

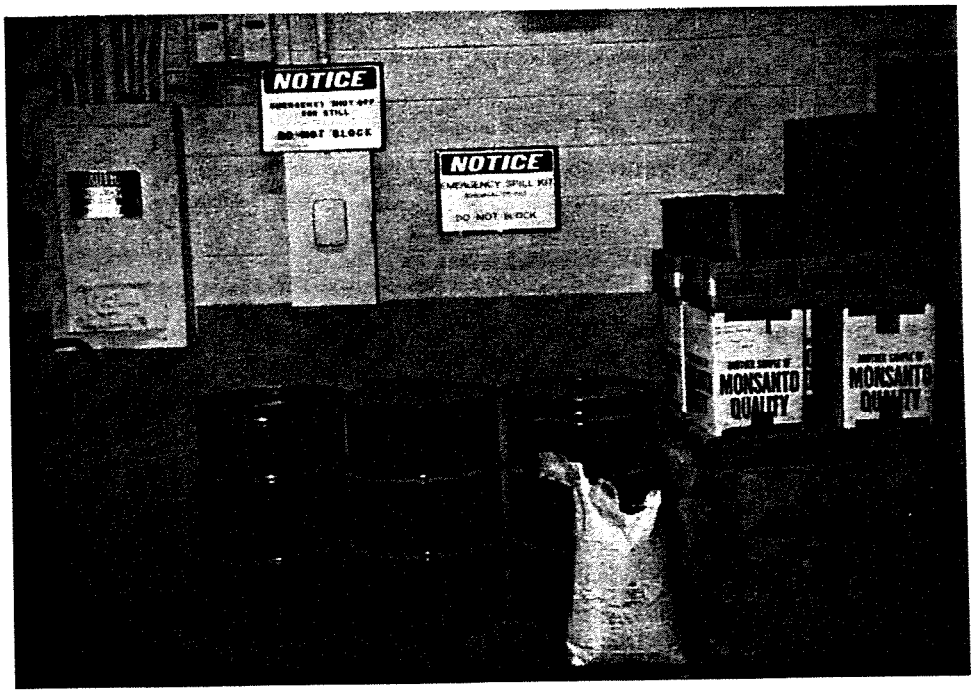


Photo #4: Emergency Spill Kit in Building #3.

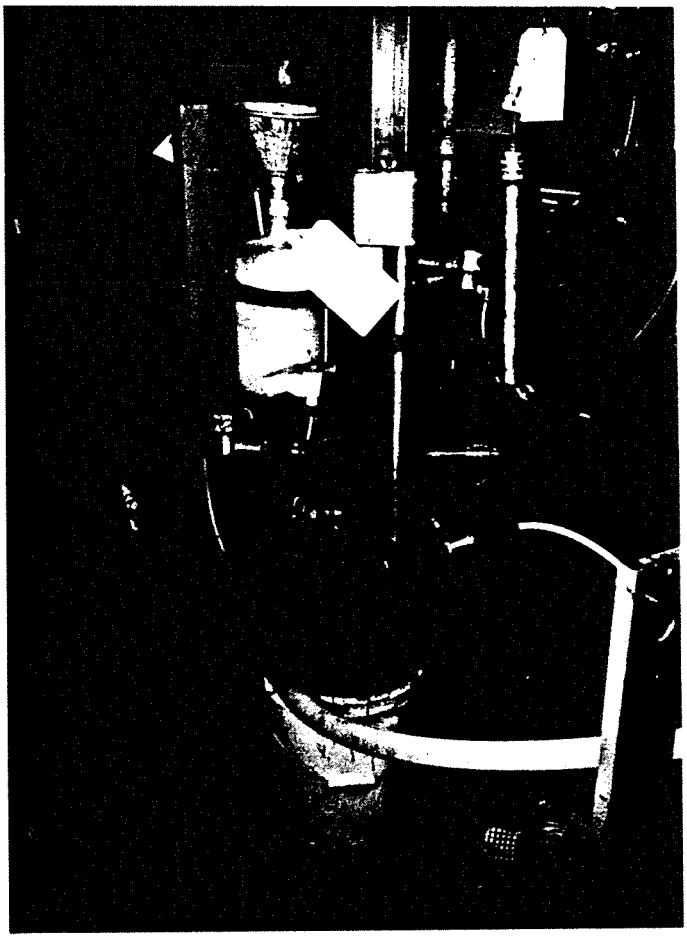


Photo #5: View of the winding machine, where MEK is added to the polyester resin to to make the adhesive, in Building #3.

Photo #6: View of where adhesive is temporarily stored before it is taken to be distilled, in Building #3.

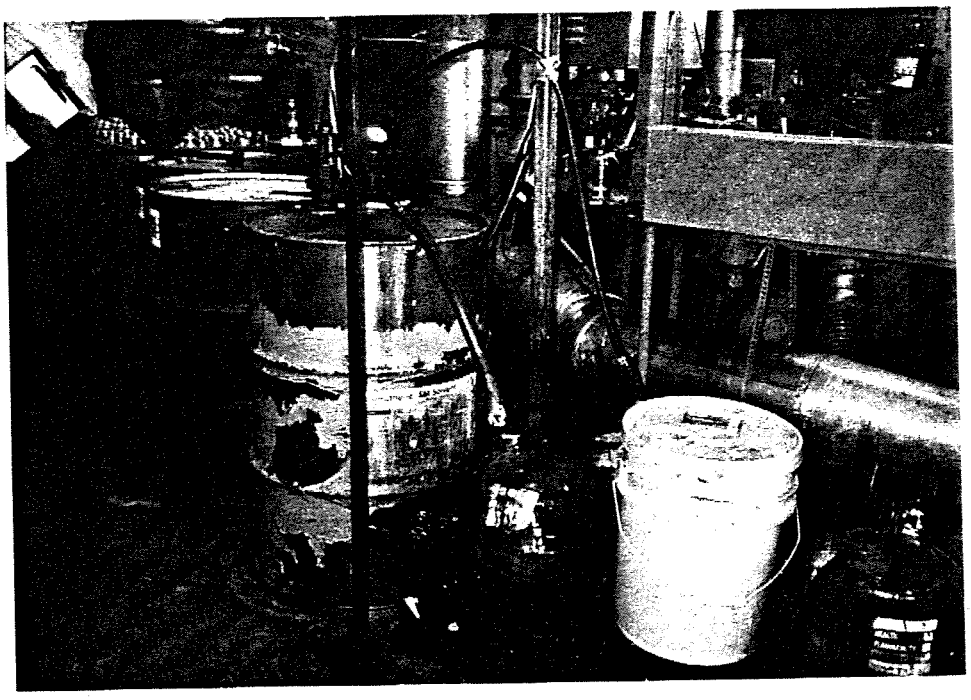


Photo #7: Another view of the temporary storage for the adhesive, in Building #3.

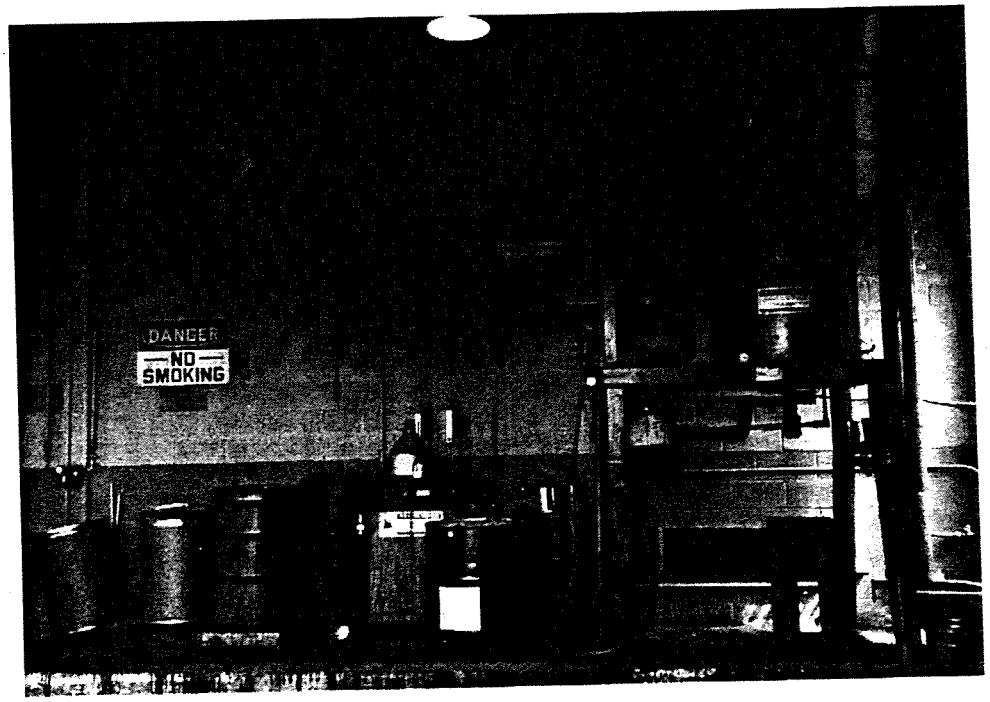


Photo #8: View of the distiller in rear of Building #2.

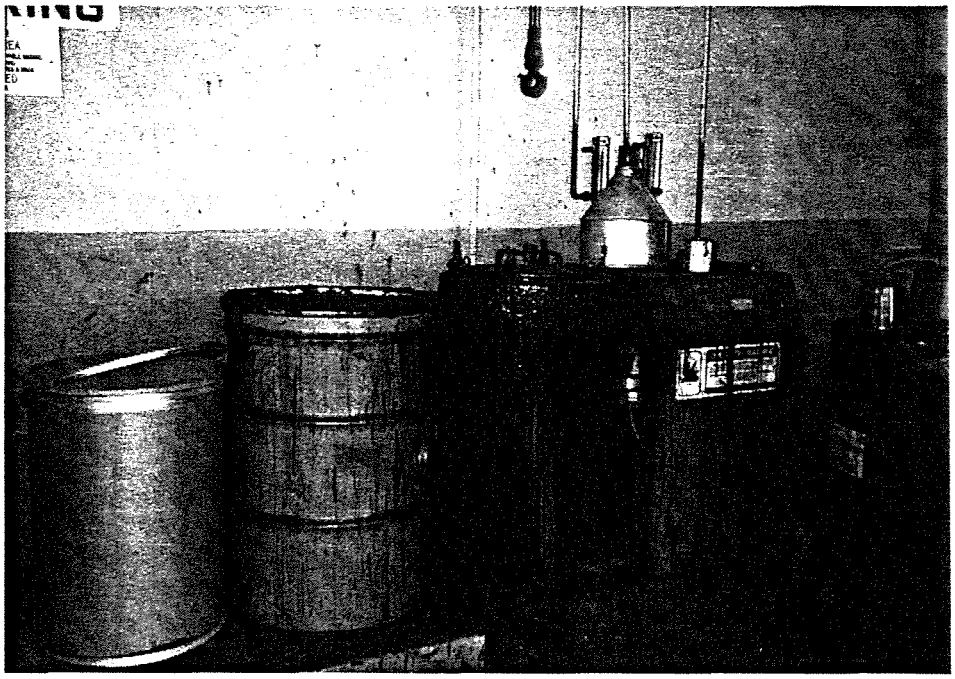


Photo #9: Another view of the distiller, in Building #3, showing temporary storage of still bottoms.

Photo #10: View of the Chemical Room in Building #3.

Photo #11: View of drums packed with still bottom and plastic bagliners, awaiting transportation in Building #2.

Photo #12: View of lubricating oil for winding machines in Building #2.

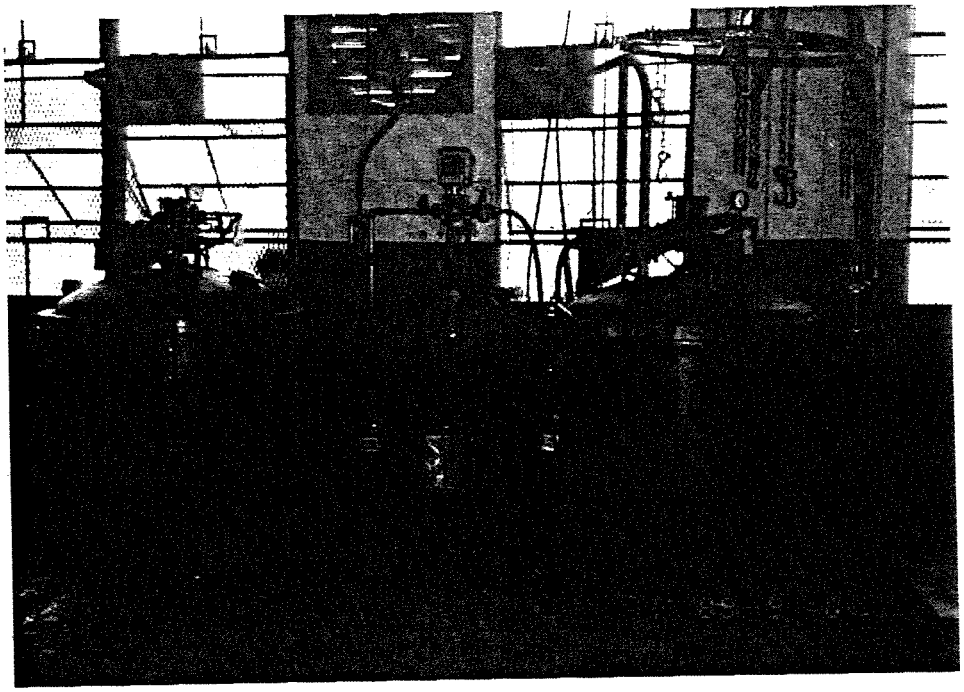


Photo #13: View of recycling area for resins used to stoneize the paper tubing in Building #2.

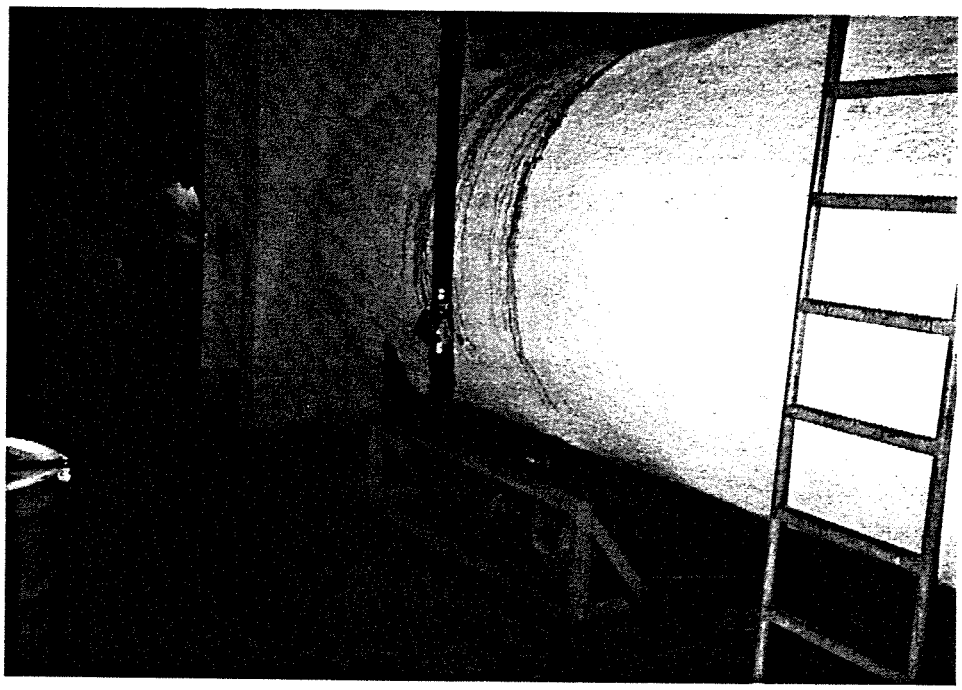


Photo #14: View of water heater used to keep resins warm so they do not harden in Building #2.

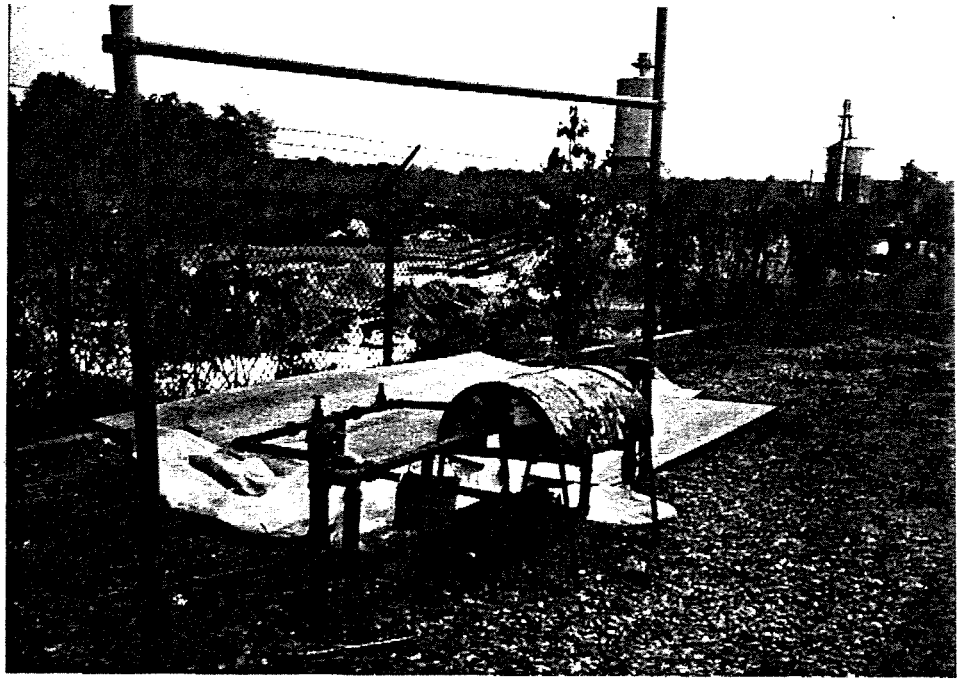


Photo #15: View of MEK underground tank that was overfilled, on the northeastern boundary of the property. Picture shows the migration of the spill onto the adjoining Public Works property.

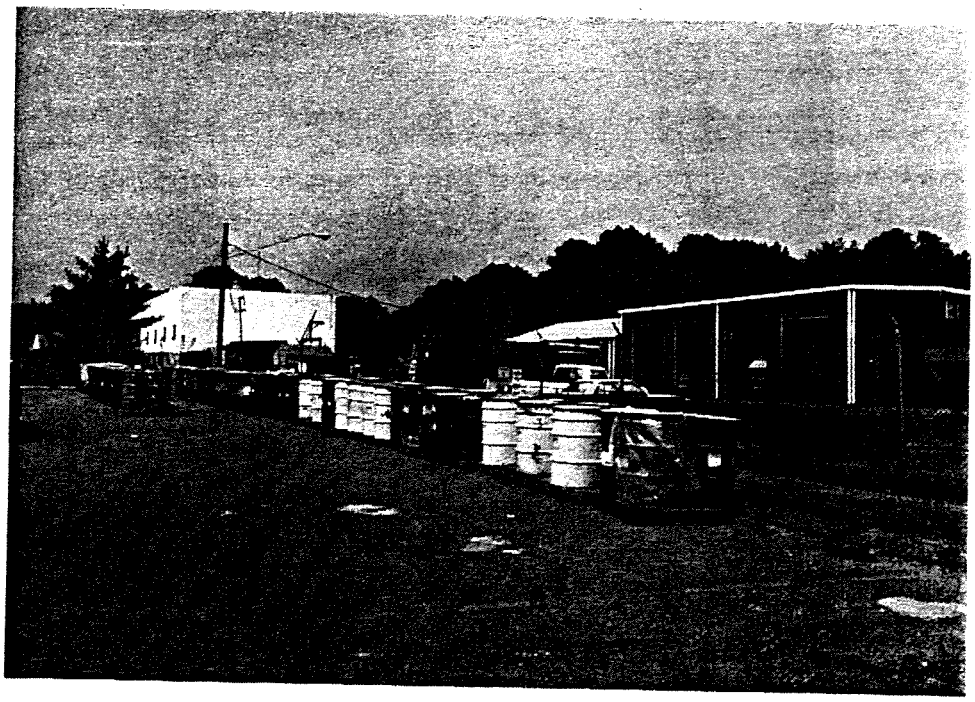


Photo #16: View of drums packed with contaminated soil from the MEK spill, awaiting removal.

APPENDIX E
HAZARDOUS WASTE ANALYTICAL DATA, HAZARDOUS WASTE GENERATOR AND SHIPMENT RECORDS AND MANIFESTS

STONE INDUSTRIAL
a member of the CLARCOR precision products group

July 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Office of Environmental Programs
Waste Management Administration
Hazardous Waste Management
PO Box 13387
Baltimore, MD 21203

Gentlemen:

Ecoflo, Inc. removed a total of seventeen thirty-gallon fibre drums from our College Park facility on Monday, July 3, 1989.

The waste drums are Hazardous Waste Solid, N.O.S. NA 9189, F005 and F003. These drums will be transported to Ecoflo, Inc. in Greensboro, NC and will then be transported to Thermalkem, Inc. in South Carolina.

Please note the change for manifest document number from 18767 to 05448. This correction was made immediately after the drums were removed from our College Park site. Mr. Dave Mundt of Ecoflo, Inc. has been notified and he has explained that they will make the correction on their hazardous waste manifest.

Should you have any questions regarding this shipment of hazardous waste, please call me.

Sincerely yours,

STONE INDUSTRIAL
CLARCOR Precision Products Group

John B. Hager
Chief Chemist

JBH:jmd

51st Avenue & Cree Lane
College Park, Maryland 20740-1995
301/474-3100
FAX: 301/345-2367

HAZARDOUS WASTE MANIFEST

Department of the Environment
Hazardous & Solid Waste Management Administration
P.O. Box 13387 Baltimore, MD 21203

Hazardous Waste Division

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No.2050-0039 Expires 9/30/88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MDD058594920 — Manifest Document No.: 1 8 7 8 7 — 2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Stone Industrial, Inc., CLARCOR a Tubular Products Group 05448
51st Ave. and Cree Lane, College Park, MD 20740

4. Generator's Phone (301) 474-3100

A. State Manifest Document Number: MDC 0205448

B. State Generator's ID: same JSH

C. State Transporter's ID: HWH 380 89A1944 DC 5555

D. Transporter's Phone

E. State Transporter's ID: HWH DC

F. Transporter's Phone

G. State Facility ID

H. Facility's Phone: (919) 855-7925

5. Transporter 1 Company Name: Ecoflo Inc., Savage MD

6. US EPA ID Number: NCD980842132

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address: Ecoflo Inc., of North Carolina
2750 Patterson Street
Greensboro, NC

10. US EPA ID Number: NCD980842132

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid, n.o.s. NA 9189 ORM-E F005, F003 1ABM-002 ST00001-1976	017	DF	05100	P	F005
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

	Haz. Code	Physical State	Specific Gravity	Percentage
a.	T	S	1.0-1.2	100%
b.				
c.				
d.				

K. Handling Codes for Wastes Listed Above: a. c. b. d.

15. Special Handling Instructions and Additional Information

a.) Methyl Isobutyl Ketone 1% n-butanol 1% Polyester adhesive 75-90% Job#9-0311
Methyl Ethyl Ketone 1% toluene 1% Polyester bags 01-20% Bill to P.O. #127

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulations.
Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: John B. Hager — Signature: John B. Hager — Month Day Year: 070389

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Curt Windmiller — Signature: Curt Windmiller — Date: Month Day Year: 070389

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date: Month Day Year

19. Discrepancy Indication Space

11a) Item 1. - "F003" was ommitted in ERROR.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: MARK A. STARR — Signature: Mark A. Starr — Date: Month Day Year: 07 11 89

MDC 0205448

EPA Form 8700-22 (7-84)

ECOFLO

8520-M Corridor Road
Savage, Maryland 20763
(301) 498-4550

P.O. Box 10383
Greensboro, NC 274
(919) 855-7925

NOTIFICATION OF ACKNOWLEDGEMENT

GENERATOR Stone Industrial, Inc.

As a requirement of 40 CFR 264.12 (b) this letter also serves to inform you that this facility has the proper permits and will accept your shipment (as determined in the approved waste profile submitted for this waste).

January 9, 1989

CERTIFIED MAIL

Office of Environmental Programs
Waste Management Administration
Hazardous Waste Management
P. O. Box 13387
Baltimore, Maryland 21203

Gentlemen:

Ecoflo, Inc. removed a total of twenty-eight fiber drums from our College Park facility.

The waste drums are Hazardous Waste Solid, N.O.S., NA 9189, RQ F005, F003. These drums will be transported to Ecoflo, Inc. in Greensboro, North Carolina and will then be transported to Thermalken, Inc. of South Carolina.

The manifest, document number MDC 0118767 is enclosed.

Should you have any questions, please call me at 301-474-3100 extension 205.

Sincerely,

STONE INDUSTRIAL

John B. Hager
Chief Chemist

JBH:jgm

Enclosure

HAZARDOUS WASTE MANIFEST

Department of Health and Mental Hygiene
Office of Environmental Programs
Waste Management Administration • Hazardous Waste Division
P.O. Box 13387 • Baltimore, Maryland 21203

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9/30/88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MDD058594920 — Manifest Document No.: 18767
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Stone Industrial, Inc., CLARCOR a tubular products group
51st Ave. & Cree Lane
College Park, MD 20707 (301) 474-3100

4. Generator's Phone

A. State Manifest Document Number: MDC 0118767
B. State Generator's ID: SAME
C. State Transporter's ID: HWH 475 39A1939 DC 4559
D. Transporter's Phone
E. State Transporter's ID: HWH DC
F. Transporter's Phone
G. State Facility ID
H. Facility's Phone: 919-855-7925

5. Transporter 1 Company Name: Ecoflo, Inc., Savage, MD
6. US EPA ID Number: MCD980842132
7. Transporter 2 Company Name
8. US EPA ID Number
9. Designated Facility Name and Site Address
Ecoflo Inc., of North Carolina
2750 Patterson Street
Greensboro, NC
10. US EPA ID Number: NCD980842132

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste ~~Flammable~~ Solid, n.o.s. NA 9189 ORM-E RQ F005, F003 1ABM-002 ST00001-1976	028	DF	09800	P	F005
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

	Haz. Code	Physical State	Specific Gravity	Percentage
a.	T	S	1.01.2	100%
b.				
c.				
d.				

K. Handling Codes for Wastes Listed Above
a. SCY c.
b. d.

15. Special Handling Instructions and Additional Information
a.) Methyl Isobutyl Ketone ≤1% n-butanol ≤1% Polyester Adhesive 75-90%
Methyl Ethyl Ketone ≤1% toluene ≤1%
Polyester bags 1-20% Bill to P.O. #222

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulations.
Unless I am a small quantity generator who has been exempted by statute or regulation from the duly to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: John B. Hager, Chief Chemist — Signature: John B. Hager — Month Day Year: 01 09 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: David Muhl — Signature: David Muhl — Date: 01 09 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Date: Month Day Year

GENERATOR — TRANSPORTER — FACILITY

MDC 0118767

EPA Form 8700-22 (7-84)

(800) ... 802 and the Maryland OEP at (301) 225-5700 nights, and Holidays at (301) 243-8700.

HAZARDOUS WASTE MANIFEST

ECOFLO

8520-M Corridor Road
Savage, Maryland 20763
(301) 498-4550

P.O. Box 10383
Greensboro, NC 27404
(919) 855-7925

NOTIFICATION OF ACKNOWLEDGEMENT

GENERATOR Stonewold, Inc, Clarcon

As a requirement of 40 CFR 264.12 (b) this letter also serves to inform you that this facility has the proper permits and will accept your shipment (as determined in the approved waste profile submitted for this waste).

...ger, Chief C...
...ecision Product...
...dustrial
...ame of Sender)
...enue and Cree ...
...t or P.O. Box)
...ark, Maryl...
...d ZIP Code

FOR PRIVAT... USE $300

...Office of Environmental Programs
...Administration • Hazardous Waste Division
...13387 • Baltimore, Maryland 21203

Form Approved. OMB No. 2050-0039 Expires 9/30/88

Information in the shaded areas is not required by Federal law.

Manifest Document No. MDC 0118698

Generator's US EPA ID No.

Manifest Document No.

Page 1 of 1

Generator's Name: Stone Industrial, Inc., [illegible] a tubular products [illegible]

Generator's Address: [illegible] College Park, MD (301) 474-3100

April 3, 1989

State Generator's ID

State Transporter's ID: DC

Transporter's Phone

State Transporter's ID: HWH DC

Transporter's Phone

State Facility ID

Facility's Phone

5. Transporter 1 Company Name: CERTIFIED MAIL

6. US EPA ID Number

7. Transporter 2 Company Name: Office of Environmental Programs

8. US EPA ID Number

9. Designated Facility Name: Waste Management Administration
Hazardous Waste Management
P. O. Box 13387
Baltimore, Maryland 21203

US EPA ID Number

12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
				F005

Gentlemen:

Ecoflo, Inc. has removed thirty-four fiber drums (30 gallon capacity) from our College Park facility.

The waste drums are Hazardous Waste Solid, N.O.S., NA 9189, RQ F005, F003. These drums will be transported to Ecoflo, Inc. of Greensboro, North Carolina and will then be transported to Thermalkem, Inc. of South Carolina.

The mainfest document number MDC 0118698 is enclosed.

Should you have any questions concerning the waste shipment call me at 301-474-3100.

Handling Codes for Wastes Listed Above

Sincerely,

STONE INDUSTRIAL

Instructions and Additional Information

Bill against P.O.

John B. Hager
Chief Chemist

JBH:jgm

Enclosure

Signature

Month Day Year: 04 03 89

Date

Month Day Year: 04 03 89

Signature

Date

Month Day Year

Signature

Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19

Signature

Date

Month Day Year

...MAIL ... GENERATOR STATE

HAZARDOUS WASTE MANIFEST
Department of Health and Mental Hygiene
Office of Environmental Programs
Waste Management Administration • Hazardous Waste Division
P.O. Box 13387 • Baltimore, Maryland 21203

(Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 Expires 9/30/88

HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MDD058509202 Manifest Document No. 618918

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Industrial Stone Industrial, Inc., CLARCOR a tubular products group
51st Avenue & Cree Lane
College Park, MD (301) 474-3100

4. Generator's Phone

A. State Manifest Document Number MDC 0118698

B. State Generator's ID same

C. State Transporter's ID HWH 360 DC 455

D. Transporter's Phone

5. Transporter 1 Company Name: Ecoflo Inc., Savage MD
6. US EPA ID Number: MCD098084213 2

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID HWH DC

F. Transporter's Phone

9. Designated Facility Name and Site Address
Ecoflo Inc., of North Carolina
2750 Patterson Street
Greensboro, NC
10. US EPA ID Number: NCD098042132

G. State Facility ID

H. Facility's Phone 919-855-7925

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous waste solid, n.o.s. NA 9189 ORM-E RQ F005, F003 1ABM-002 ST00001-1976	03	DF	1055	P	F005
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

	Haz. Code	Physical State	Specific Gravity	Percentage
a.	T	S	1.0-1.2	100%
b.				
c.				
d.				

K. Handling Codes for Wastes Listed Above
a. S
b.
c.
d.

15. Special Handling Instructions and Additional Information
a.) Methyl Ethyl Ketone ≤ 1% Polyester Bags 1-20%, Methanol ≤ 1%
n-Butanol ≤ 1%, Toluene ≤ 1% Polyester adhesive 75-90%
Bill against P.O. # 777

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulations.
Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: John B. Hager
Signature: John B. Hager
Month Day Year: 04 03 89

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: David Muhl
Signature: David Muhl
Date: Month Day Year 04 03 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

MDC0118698

LAND DISPOSAL RESTRICTION
TREATMENT FACILITY NOTIFICATION

Receiving Treatment Facility Name: Ecoflo of North Carolina

EPA Identification Number: NCD 980842132

By copy of this letter, you are notified pursuant to 40 CFR 268.7(a)(1) that you are receiving a waste which is restricted from land disposal.

The following information relates to this waste:

EPA Hazardous Waste Number(s) NA 9189 n.o.s. Hazardous wawste solid RQ F005, F003

Treatment Standard: see Table CCWE

Manifest Number: MDC 0118698

Waste Analyses Data is attached where available. Otherwise, this determination is based upon knowledge of waste.

Generator Name: Stone Industrial, CLARCOR

EPA ID: MDD 058594920

Representative (sign) John B. Hager
(print) John B. Hager

Date: April 3, 1989

TABLE CCWE—CONSTITUENT IN WASTE EXTRACT

F001 – F005 spent solvents	Concentration (in mg/l)	
	Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.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	.30	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
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-trichloro-1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

F020-F023 and F026-F028 waste containing dioxins	Concentration
HxCDD—All Hexachlorodibenzo-p-dioxins	< 1 ppb
HxCDF—All Hexachlorodibenzofurans	< 1 ppb
PeCDD—All Pentachlorodibenzo-p-dioxins	< 1 ppb
PeCDF—All Pentachlorodibenzofurans	< 1 ppb
TCDD—All Tetrachlorodibenzo-p-dioxins	< 1 ppb
TCDF—All Tetrachlorodibenzofurans	< 1 ppb
2,3,7,8-Tetrachlorodibenzo-p-dioxin	< 0.05 ppm
2,3,7,8-Tetrachlorodibenzofuran	< 0.05 ppm
2,3,4,7,8-Pentachlorodibenzofuran	< 0.10 ppm
Pentachlorodibenzo-p-dioxin	< 0.01 ppm

E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
WILMINGTON, DELAWARE 19898

CHEMICALS AND PIGMENTS DEPARTMENT

Technical Laboratory (D)
Chambers Works
Deepwater, New Jersey 08023

March 13, 1987

Mr. John Hager
J. L. Clark Manufacturing Co.
51st Avenue and Cree Lane
College Park, MD 20740

Dear Mr. Hager:

In response to your request, following are comments on the original samples submitted to us in October 1981. The samples are designated as A - tube grinder recirculating water, B - lye solution, C - scrubber recirculating water, and D - collection tank.

	Sample A	Sample B	Sample C	Sample D
pH	7.2	11.2	6.8	12
DOC	674 mg/L	21,400 mg/L	1550 mg/L	36,600 mg/L
TSS	40 mg/L	30,220 mg/L	8160 mg/L	220 mg/L

Originally, the wastewater treatment contract was written to include a mixture of all of the above waste streams. Based on the mixture, it is not obvious whether the waste stream would be considered RCRA hazardous or nonhazardous. The last shipment received contained 9625 mg/L DOC and 2820 mg/L TSS. These numbers are consistent with expected mixtures of the original samples. Again, it is not obvious what the RCRA designation should be, if any.

It is the generator's responsibility to determine the RCRA hazards associated with their waste streams. I suggest you send samples to a certified laboratory (we are not certified) for EP toxicity studies to determine whether your waste is hazardous or nonhazardous. I have enclosed some information which will explain the rules in more detail.

I hope the above will be of some help. Don't hesitate to contact me if there are any additional questions or comments.

Sincerely yours,

John F. Stroub
(609) 299-0607

JFS:nep
Enclosure
9793C

JUL 15 1983

BIOSPHERICS INCORPORATED

Technologies for Environment and Health

ppm = mg/l

July 14, 1983

Mr. William A. Raines
Stone Industrial Division
Plant #2
51st Avenue and Cree Lane
College Park, Maryland 20740

RE: BIOS #7620

Dear Mr. Raines:

Listed below are the results of analysis performed on the water sample received on June 17, 1983.

Parameter	Concentration
pH, units	8.68
Chemical Oxygen Demand, ppm	24,900
Phenol, ppm	116
BOD, ppm	2,060
Total Suspended Solids, ppm	66.6

The analyses were performed in accordance with EPA's Methods for Chemical Analyses of Water and Wastes.

If you have any questions concerning these results, please do not hesitate to call. Thank you.

Sincerely,

H. Markus Gudnason
Project Leader

Frank G. Fitzpatrick
Senior Project Leader
Environmental Analytical Services

Information and Publications Division
Environmental Instrumentation Division
5001 Forbes Boulevard
Lanham/Seabrook, Maryland 20706
(301) 459-8090
Telex 908 740

WASTE WATER

WSSC LIMITATIONS: BOD 300 mg/1, COD 500 mg/1, Phenol 0.1 mg/1, SS 1900 mg/1, ph 6.0-9.0

	BIOSPHERICS LAB 1980	DUPONT 1981	BIOSPHERICS 1982
SCRUBBERS (Pollution Control)			
BOD (mg/1)			10,200
COD (mg/1)	8,690		45,000
Phenol (mg/1)	174,000		5,340
TSS (mg/1)		8,160	11.7
ph	6.02		4.6
DOC (mg/1)		1,550	
OUTSIDE TANK			
BOD			1,000
COD	117,000		67,800
Phenol	29,600		1,880
TSS		220	1,520
ph	7.24		12.3
DOC		36,600	
RECIRCULATING - STONIZED			
BOD			132
COD	718		1,660
Phenol	10,400		244
TSS		40	163
ph	6.47		7.5
DOC		674	
CLEANING TANKS			
BOD			
COD			
Phenol			
TSS		30,220	
ph			
DOC		21,400	

APPENDIX F
Memo to MDE/HSWMA, Hazardous Waste Enforcement Division

MARYLAND DEPARTMENT OF THE ENVIRONMENT

MEMORANDUM

Copies Mary-Linda Adams
Marie Fisher

To Butch Dye, Jr., Chief
HSWMA Enforcement Div.

From Charles Lewis, Chief
CERCLA Pre-Remedial Div.

Date October 13, 1989

Subject Stone Industrial, College Park, Maryland (P.G. County)

During the course of conducting an Environmental Priorities Initiative Preliminary Assessment (EPI PA) at the above mentioned site in September 1989, inspection by this Division identified some areas of concern at the facility. The following information is being forwarded to your Division for follow-up action relating to general waste management practices at the facility.

Cooling water, used to cool the tube cutting machine blades, is generated at the site. This water is recycled, when it cannot be recycled anymore it is pumped into an underground storage tank located on the Stone Industrial Site prior to transportation by Dupont in Delaware. This waste water is shipped as non-hazardous waste. However, analytical data provided by the facility is not sufficient to determine whether the waste water is non-hazardous. It is recommended that the facility provide a complete priority pollutant scan of the waste water to confirm whether it is non-hazardous.

The facility manufactures plastic wound tubing. The winding of the plastic tubing is performed in Building #3. In this operation the plastic is bounded by a polyester adhesive. This adhesive is reused for approximately two days before it is distilled on-site to recover the solvents. During the recycling period the adhesive is stored in drums near the winding machine. During the site visit it was observed that these drums were not labeled clearly with the contents of the drums or the waste accumulation dates.

Waste storage and handling areas of the facility were found to be in generally good condition. Waste management practices and handling of waste material appears to be in compliance with RCRA regulations except for the above mentioned discrepancies. This Division recommends a RCRA inspection of the facility and follow-up enforcement action if necessary.

CBL:mf

October 9, 1989

Letter to MDE regarding MEK release

STONE INDUSTRIAL
a member of the CLARCOR precision products group

Jim Tartisch

October 9, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur O'Connell
Sectional Chief of Hazardous and
Solid Waste Management Administration
Department of Environment
2500 Broening Highway
Baltimore, MD 21224

Dear Mr. O'Connell:

CLARCOR August 22, 1989 2:20 p.m.
Stone Industrial
51st Avenue & Cree Lane
College Park, MD 20740

(301) 474-3100 (24 hours)
(301) 474-3103 (Plastics Night Shift)
(301) 474-3102 (Paper Tube Night Shift)

Incident Report: Report No. 14751 (update report)
Date of Incident: Tuesday, August 22, 1989
Time of Incident: Approximately 2:30 p.m. - 2:45 p.m.
Notification: National Response Center (800) 424-8802
Time Notified: 3:10 p.m. - 3:15 p.m.
Notification: Maryland State Department of Health and Mental Hygiene, Office of Environmental Programs (301) 631-3386
Time Notified: 3:00 p.m. - 3:05 p.m.
Site Location:
1. 51st Ave. & Cree Lane, College Park, MD 20740
2. City of College Park Public Works Department, 9219 - 51st Avenue, College Park, MD 20740
3. CSX Transportation, Inc., Branchville, MP 29.58 Prince George's County, Maryland

Type of Incident: Methyl Ethyl Ketone (MEK) spill from underground tank.
Quantity: approximately 449 gallons (3,030 lbs.)
Material: Methyl Ethyl Ketone (MEK) C.A. SRN No. 78933
Injuries: No personal injuries

As discussed in the August 24, 1989 report 449 gallons of MEK overflowed from the fill spout onto the ground, flowing 10 feet towards the grounds of the City of College Park Public Works facility. The MEK flowed approximately 290 feet northeast across the public works facility turning south onto the CSX Transportation property, flowing an additional 15-20 feet. The spill was

51st Avenue & Cree Lane
College Park, Maryland 20740-1995
301/474-3100
FAX: 301/345-2367

contained and cleaned up with Mr. Nigussie Retta, Public Health Engineer, from Maryland Hazardous and Solid Waste Management Administration observing. The following day, Wednesday, August 23, 1989, Gregg T. Campbell from EA Engineering Sciences, took 12 samples along the path of the spill. A sketch drawing along with the soil sample results are included as attachment I. In addition, a composite sample along the spill path was taken by me and authorized by Mr. Herb Meade. The composite sample was taken and submitted Thursday, August 24, 1989.

The project was turned over from the Hazardous and Solid Waste Management Enforcement Division to the Underground Storage Tank Division, Mr. James Chilcote, Environmental Inspector. Mr. Chilcote met with me and inspected the site on September 1, 1989. Mr. Chilcote explained all areas except along the railroad fence line could be backfilled. Mr. Chilcote continued that the area along the fence line between the City of College Park Public Works and the CSX Railroad would need further excavation. He requested 48 hour notice prior to further excavation and tank removal. He explained that CSX Railroad would need to be notified at this point.

Joseph S. Lovetro, Project Engineer, CSX Transportation, Incorporated was notified and he inspected the site. Mr. Lovetro authorized a five-day right of entry commencing at 8:00 a.m. September 25, 1989 and ending at 6:00 a.m. September 29, 1989. The fibre optics line and the CSX signal lines had been previously marked by the appropriate agencies: Mr. Weldon Cook, U.S. Sprint, and Mr. Tom Tebbra, CSX Transportation, Inc., were present during the recommended excavation along the fence line between the property of the City of College Park Public Works facility and CSX Transportation, Inc. In addition, Gregg Campbell, EA Engineering Sciences, and James Chilcote, Maryland UST Division, were present during Mr. Chilcote's required (9/1/89 report, Attachment II) excavation conducted on Wednesday, September 27, 1989.

As the soil was excavated Mr. Campbell analyzed the concentrations. The soil was removed to the point at which Mr. Chilcote and Mr. Campbell had a concensus that the concentrations were sufficiently low to cease digging (0-2 ppb). Mr. Campbell took a composite soil sample for analysis. At the conclusion of the excavation, Stone Industrial had 157 metal 55-gallon drums of contaminated soil. } HNU meter measures organic

James Chilcote reviewed the site and gave three requirements:

1. Return all disturbed area to the original and acceptable condition of the owners, which has been completed.

2. Submit copies of the results received by Gregg Campbell taken of the composite soil sample. } 4-6 weeks

3. Submit all copies of hazardous waste manifests upon disposal.

A copy of the report dated 9/27/89 is enclosed as Attachment III.

The 157 drums of Hazardous Waste Solid, n.o.s. U159, NA 9189 was removed under the direction of Ashland Chemical Corporation, Binghampton, New York and will be landfilled at ChemWaste Management, Inc. in Emelle, Alabama. The drums were removed on four separate dates as follows:

46 drums - September 29, 1989
52 drums - October 2, 1989
52 drums - October 4, 1989
7 drums - October 5, 1989

See hazardous waste manifests Attachments IV, V, VI and VII.

A final report will be submitted once Stone Industrial has received written notification from the property owners affected by the spill as well as James Chilcote, MD UST Division.

Sincerely yours,

STONE INDUSTRIAL
CLARCOR Precision Products Group

John B. Hager
Chief Chemist

JBH:jmd

Attachments

cc: Mr. Ron Monteith, City of College Park Public Works
Mr. Joseph Lovetro, Project Engineer, CSX Transportation, Inc.
Mr. Nigussie Retta, Public Health Engineer, H&S Waste Management
Mr. James Chilcote, Environmental Inspector, UST Div.

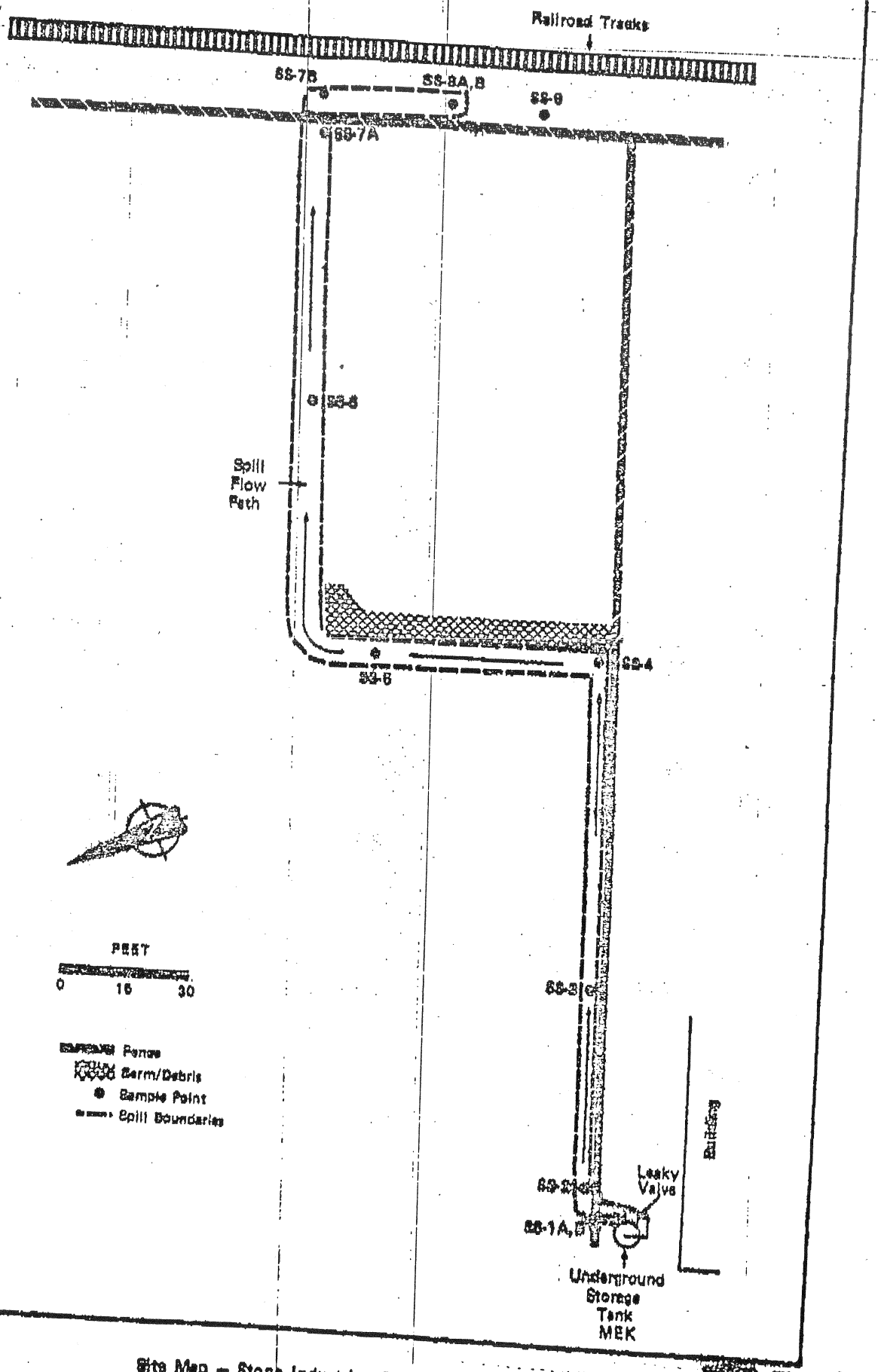
Mark Steger, Attorney at Law
John H. Easto, Chief Engineer, Stone Industrial
Tref Harnois, Vice President-Administration, CLARCOR
J. Mauritz Johnson, Group Vice President Precision Products, CLARCOR
Stephen A. Lieb, Personnel Director, Stone Industrial
David Lindsay, Corporate Personnel Director, CLARCOR
Timothy E. Kartisek, General Manager, Stone Industrial
Dennis McGarity, Director of Manufacturing, Stone Industrial

LEVELS OF MEK IN SOIL SAMPLES FROM STONE INDUSTRIES MEK SPILL
(23 AUG 1989) CONCENTRATION OF MEK (mg/kg, ppm)

Sample No.	
1A	12,000 (1.2%)
1B	170
2	12
3	3.7
4	1.4
5	22
6	7.6
7A	1,400
7B	0.88
8A	Trace
8B	0.088
9	0.039
Composite	14
Trip Blank	ND
Field Blank	Trace

PRELIMINARY DATA
SUBJECT TO REVISION

ND = Not detected.
Trace = Present but less than detection limit (20 ppb).
B = Samples taken from 3 ft deep. All other samples are from surface.



Site Map — Stone Industries, MEK Spill Sits.

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

ATTACHMENT II
page 1 of 1

Report of Observations

Type of Inspection/Observations: _____ Date 09/01/89

Facility Name: STONE INDUSTRIES, 51ST & CREE LA. COLLEGE PARK

Remarks: WRITER MET JOHN HAGGER ON SITE.

DURING IMPROPER OPERATION OF MEK UNDERGROUND STORAGE SYSTEM AN OVER FILL OF ONE OF TWO 750g UST OCCURED.

AS EA ENGINEERING'S SKETCH STATES THE PRODUCT FLOWED ONTO ADJOINING PROPERTY ABOUT 300'±. ENTIRE AREA OF CONTAMINATION WAS EXCAVATED AND PUT INTO DRUMS. AREA IS ABOUT 3' WIDE AND 18" DEEP

AS SAMPLES INDICATE LOW LEVELS OF CONTAMINATION WERE FOUND AT BOTTOM OF EXCAVATION EXCEPT AT FENCE LINE ALONG RAIL ROAD. THIS AREA NEEDS FURTHER EXCAVATION.

EXCAVATION SHOULD CONTINUE UNTIL ALL CONTAMINATION IS REMOVED OR A MONITORING WELL IS DETERMINED TO BE NEEDED.

CONTACT RAIL ROAD BEFORE STARTING EXCAVATION.

~~AND~~

GIVE WRITER 48 HOURS NOTICE TO EXCAVATION, AND TANK REMOVAL.

WRITER MET DENIS McGARITY (DIRECTOR OF MANUFACTURING

IT WAS ESTIMATED AT 449g LOST.

EXCAVATION EXCEPT FOR AREA TO BE EXCAVATED CAN BE BACKFILLED.

Observer: James B. Clark Person Interviewed: Denis McGarity

MDE 111
REV. 1/11/88

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

ATTACHMENT III
page 1 of 1

Report of Observations

1400

Type of Inspection/Observations: _____ Date 09/27/89

Facility Name: Stone Industries 5 [illegible] + Crit St College Park

Remarks: Writer Met Mr Cambell (EA) And John Hagar (Stone Ind.) On Site.

Back Hoe Operator Excavated An Area Approx 5' x 10' x 3' Deep Until HNU Reading Hit Between 0-2 PPB. Soils Were Drumed And Will Be Trucked To Arkinsaw Next Week. Two CSX Railroad Personal Were On Site To Protect Two Transmition Cables In Excavation Area. No Problems Occured And Excavation Can Be Backfilled.

Greg Cambell Took A Composit Sample At Bottom Side Of Excavation To Determine Level Of Clean Up. Area Excavated Was Sample Point # 7A.

~~[illegible]~~

Requirements

1) Return All Disturbed Area To Original Condition Or A Condition Exceptable By The Property Owners.

2) Submit Copies Of Composite Sample Test Results To Writer.

3) Submit Copy Of Hazoridos Material Transport Manifest To Writer.

Observer: James H. Ch[illegible] Person Interviewed: [illegible]

MDE 111
REV. 1/11/88

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Items 3

(Form designed for use on elite (12-pitch) typewriter.)

ATTACHMENT

Form Approved. OMB No. 2050-0039. Expires 9-30-91

FORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MDD058594920 Manifest Document No. 975006

2. Page 1 of

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Stone Industrial Division, M CLARCOR precision prod. group
51st AVE. & Cree Lane, College Park, MD 20740

4. Generator's Phone (301) 474-3100

5. Transporter 1 Company Name: MATLACK, INC.

6. US EPA ID Number: DED981111016

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: ALD000622464

A. State Manifest Document Number: CWMA 497506

B. State Generator's ID: MDD058594920

C. State Transporter's ID: HWH 064 87A 0331 DC 6537

D. Transporter's Phone: 800 433 7412

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone: 205/652-9721

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous Waste Solid, n.o.s. U159, NA 9189 PG III ORM-E CWM Profile Number ASH 71-2268	01 46	DM	37500	P	U159
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
No absorbent has been added. Toxic (T), Ignitable (I)
Specific Gravity 1.6-1.7 Solid (S) Soil waste from MEK spill
WASTE GENERATED FROM MARYLAND

K. Handling Codes for Wastes Listed Above
a. (T), (I), (S) c. (L)
b. d.

15. Special Handling Instructions and Additional Information
See soft Hammer attachment.
STATE Transporter ID HWH 064 87A 0331 D.C. 6537

Work Order #: 89/002019 Purchase Order #: 1808

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford

Printed/Typed Name: John B. Hager Signature: John B. Hager Month Day Year: 09 29 89

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Bobby Ward Signature: Bobby Ward Month Day Year: 09 29 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name Signature Month Day Year

EPA Form 8700-22 (Rev. 9-86) Previous edition is obsolete.

STATE OF ALABAMA (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

MDN

ATTACHMENT V

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MDD058594920 — Manifest Document No.

2. Page 1 of

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Stone Industrial Division, CLARCOR precision Products group
51 st AVE. & Cree Lane, College Park, MD 20740

4. Generator's Phone (301) 474-3100

5. Transporter 1 Company Name: MATLACK, Inc.
6. US EPA ID Number: DFD981111016

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: ALD006224644

A. State Manifest Document Number: CWMA 497508
B. State Generator's ID: MDD058594920
C. State Transporter's ID: HWH 89A-0332 D.C. 1350
D. Transporter's Phone: 1-800-433-8470
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone: 205/652-9721

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid, n.o.s., U159 NA 9189 ORM-E RQ — CWM Profile Number ASH- 71-2268	052	DM	41600	P	U 159
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
a.) No absorbent has been added. Toxic (T), Ignitable (I)
Specific Gravity 1.6-1.7 Solid (S) Soil waste from MEK spill a.)
MEK 1% DIRT 99%
WASTE GENERATED FROM MARYLAND. color-DARK BROWN

K. Handling Codes for Wastes Listed Above
a. (T), (I) c. (S), (L) b. d.

15. Special Handling Instructions and Additional Information
See Soft Hammer Attachment.

Driver Cert. #1350

Work Order #: 89/004 011 Purchase Order #: 1808

16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: John B. Hager — Signature: John B. Hager — Month 10 Day 02 Year 89

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MARK E. REESER — Signature: Mark E. Reeser — Month 10 Day 02 Year 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 9-86) Previous edition is obsolete.

STATE OF ALABAMA (Must Accompany Shipment)

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

WED

ATTACHMENT VI

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)*

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MDD058594920 — Manifest Document No. 97509

2. Page 1 of

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Stone Industrial Division, CLARCOR precision Prod.
51 st AVE. & Cree LN, College Park, MD 20740group

4. Generator's Phone (301) 474-3100

A. State Manifest Document Number: CWMA 497509

B. State Generator's ID: MDD058594920

5. Transporter 1 Company Name: MATLACK, INC.,

6. US EPA ID Number: DED981110166

C. State Transporter's ID: HWH 89A-0333 D.C. 6092

D. Transporter's Phone: 1-800-433-8470

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459

10. US EPA ID Number: ALD000622464

G. State Facility's ID

H. Facility's Phone: 205/652-9721

11. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid, n.o.s., U159, NA 9189, ORM-E RQ — CWM Profile Number ASH-71-2268	052	DM	41600	P	U159
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
a.) No absorbent has been added. 99% Dirt, 1% Methyl Ethyl
SpG. 1.6-1.7 Solid (S), soil waste from MEK spillKetone
Waste generated from Maryland color:Dark Brown
WASTE GENERATED FROM MARYLAND

K. Handling Codes for Wastes Listed Above
a. (L) (T), (I), (S)
b.
c.
d.

15. Special Handling Instructions and Additional Information
See soft Hammer Attachment

Driver Cert. : 6092

Work Order #: 89/006 008 Purchase Order #: 1808

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: John B. Hager — Signature: John B. Hager — Month Day Year: 10 04 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: THADDEUS BARBER — Signature: Thaddeus Barber — Month Day Year: 10 04 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22 (Rev. 9-86) Previous edition is obsolete.

STATE OF ALABAMA (Must Accompany Shipment)

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

ATTACHMENT VII

Please print or type.

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. MDD058594920 Manifest Document No. 4141 6

2. Page 1 of 1

Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address
J.L. CLARK MFG. CO./STONE INDUSTRIAL DIVISION
51ST AVE. & CREEK LANE
COLLEGE PARK, MD 20740

4. Generator's Phone 301) 474-3100

A. State Manifest Document No. NY A 034141 6

B. Generator's ID MDD058594920

5. Transporter 1 (Company Name) MAPPI TRUCKING CORP.

6. US EPA ID Number NJD000813477

C. State Transporter's ID NWH440 89A/97 1AC 681

D. Transporter's Phone (201) 566-3000

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
ASHLAND CHEMICAL INC.
3 BROAD STREET
BINGHAMTON, NY 13902

10. US EPA ID Number NYD049253719

G. State Facility's ID SAME AS 9

H. Facility's Phone (800) 637-7922

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid, n.o.s., U159 NA 9189 RQ ORM-E ASH-11-2268	007	DM	05600	P	U159
b. Hazardous Waste Solid, n.o.s., NA 9189 ORM-E F005 ST000001-1976 F003	006	DM	00600	P	F005
c.					
d.					

J. Additional Descriptions for Materials listed Above
Soil 99%
a Methyl Ethyl Ketone 1% 1.6-1.7
MEK 1%, MCL 1%, n-butanol 1%
b polyester adh. 97% 1.0-1.2

K. Handling Codes for Wastes Listed Above
a Landfill c
b 3 Incinerate d

15. Special Handling Instructions and Additional Information
a.) Waste generated from Maryland. See Soil Hammer Attac
b.) See Land Disposal Restriction Notification.
D.C. # 6819 P.O. #1301

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name John B. Hager | Signature | Mo. 10 Day 05 Year 89

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)
Printed/Typed Name FELIPE RIVERA | Signature | Mo. 10 Day 05 Year 89

18. Transporter 2 (Acknowledgement or Receipt of Materials)
Printed/Typed Name | Signature | Mo. Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Mo. Day Year

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Department of Transportation (518) 457-7362.

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

COPY 8 – Generator – retained by generator

September 28, 1990

Addendum to Environmental Priorities Initiative Preliminary Assessment Reports

MD-291

State of Maryland

DEPARTMENT OF THE ENVIRONMENT
2500 Broening Highway, Baltimore, Maryland 21224
Area Code 301 • 631-3440

William Donald Schaefer
Governor

Martin W. Walsh, Jr.
Secretary

September 28, 1990

Ms. Lynnette Elser
Maryland Project Officer
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

Dear Ms. Elser:

The purpose of this letter is to transmit addendums to the Environmental Priorities Initiative Preliminary Assessment Reports in response to Region III's comments for the following sites:

(MD-287) Rubberset Company
(MD-288) Sun Chemical Corporation
(MD-289) Thompson Steel
(MD-291) Stone Industrial

If you have any questions on these addendums, please call me or Mr. Eric Huang at (301) 631-3440. Please advise us of the finalized qualifiers after your review.

Sincerely,

Charles B. Lewis III, Chief
CERCLA/Pre-Remedial Division

CBL:eig

Enclosures

cc: Mr. Ronald Nelson
Mr. Harold L. Dye Jr.

MARYLAND DEPARTMENT OF THE ENVIRONMENT

MEMORANDUM

Copies Mary-Linda Adams
Marie Fisher

To Butch Dye, Jr., Chief
HSWMA Enforcement Div.

From Charles Lewis, Chief
CERCLA Pre-Remedial Div.

Date October 13, 1989

Subject Stone Industrial, College Park, Maryland (P.G. County)

During the course of conducting an Environmental Priorities Initiative Preliminary Assessment (EPI PA) at the above mentioned site in September 1989, inspection by this Division identified some areas of concern at the facility. The following information is being forwarded to your Division for follow-up action relating to general waste management practices at the facility.

Cooling water, used to cool the tube cutting machine blades, is generated at the site. This water is recycled, when it cannot be recycled anymore it is pumped into an underground storage tank located on the Stone Industrial Site prior to transportation by Dupont in Delaware. This waste water is shipped as non-hazardous waste. However, analytical data provided by the facility is not sufficient to determine whether the waste water is non-hazardous. It is recommended that the facility provide a complete priority pollutant scan of the waste water to confirm whether it is non-hazardous.

The facility manufactures plastic wound tubing. The winding of the plastic tubing is performed in Building #3. In this operation the plastic is bounded by a polyester adhesive. This adhesive is reused for approximately two days before it is distilled on-site to recover the solvents. During the recycling period the adhesive is stored in drums near the winding machine. During the site visit it was observed that these drums were not labeled clearly with the contents of the drums or the waste accumulation dates.

Waste storage and handling areas of the facility were found to be in generally good condition. Waste management practices and handling of waste material appears to be in compliance with RCRA regulations except for the above mentioned discrepancies. This Division recommends a RCRA inspection of the facility and follow-up enforcement action if necessary.

CBL:mf

____ NRC NOTIFIED
(1-800-424-8802)

WA E MANAGEMENT ADMINISTRATIO
INCIDENT REPORT FORM

P.G. County

ER 89-08-22-PG-0033

Received By: S. Mackowski
Print

Part I

A. INCIDENT NUMBER 89 (YR) 08 (MO) 22 (DAY) ____ (SEQUENCE)
Spill: Yes ✓ No ____ If spill, give level:

B. TIME NOTIFIED — 24 HOUR CLOCK ____

C. LEVEL — 1 ____ MINOR 2 ____ MEDIUM 3 ✓ MAJOR (See Reverse)

D. NOTIFIER: Name John Hager Address 51st Ave. Cree Lane
Telephone 301-345-2367 College Park, MD 20740 (Zip)

E. LOCATION/ADDRESS OF INCIDENT
MEDIUM AFFECTED:
1 ✓ Surface Water
2 ____ Air
3 ____ Soil/Paved
4 ____ Groundwater
5 ____ See Part II
6 ____ Street/Cross Street
____ City
____ County
____ Zip

F. RESPONSIBLE PARTY
STONE INDUSTRIES (Name)
51st AVE AND CREE LANE (Address)
College Park MD. 20740 (Zip)
301 - 345 - 2367 (Area Code) (Telephone)

G. NATURE OF INCIDENT
1 ✓ Chemical MEK (Specify)
2 ____ CHS ____ UN Number
3 ____ Landfill
4 ____ Point Source Discharge
5 ✓ Storage Tank
6 ____ Open Dumping
7 ____ Well Contamination
8 ____ Sedimentation
9 ____ Surface H_2O Quality
10 ____ Oil
11 ____ Transfer Operation
12 ____ Aquatic Kill
13 ____ Sludge/Sewage
14 ____ Compressed Gas Cylinder
15 ____ Other ____

H. CAUSE
1 ✓ Industrial
2 ____ Marine
3 ____ Transportation
4 ____ Mechanical Failure
5 ____ Operator Error
6 ____ Apparent Vandalism
7 ____ Unknown
8 ____ Other ____

I. MANIFEST NUMBER & STATE ____
1 ____ N/A
2 ____ Generator
3 ____ Hauler
4 ____ Disposal
____ Name
____ EPA ID No.
____ Name
____ EPA ID No.
____ Name
____ EPA ID No.
5 ____ Other States
6 ____ See Attachment

J. CLEAN UP: 1 ____ N/A
2 ____ State ____ Organization ____ Person In Charge
3 ____ Local ____ Organization ____ Person In Charge
4 ✓ Industry STONE INDUSTRIAL (Organization) JOHN HAGER (Person In Charge)
5 ____ Contractor ____ Organization ____ Person In Charge

K. SPILL (Estimated Quantity)
1 ____ Potential 400 gl. MEK
2 ✓ Spilled ____
3 ✓ Recovered ____
4 ____ N/A

L. COSTING
1 ____ Man-Hours ____ Hours
2 ____ Vehicle ____ Hours
3 ____ Total Incident Cost $____ (Supervisor)

M. CASE STATUS
1 ____ File Created/Open
2 ✓ Closed
3 ✓ Referred To Other Agency/Div
UST DIVISION on 08-23-89
4 ____ Rescheduled Previous Action
5 ____ Unfounded Complaint

N. PERSON(S) MAKING REPORT (PRINT)
Name(s) Jiguisie Retta.

O. REVIEWED FOR CLOSURE BY:
Arthur O'Connell

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE
MANAGEMENT ADMINISTRATION
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224

INCIDENT
REPORT

Part II Sequence _____

COMMENTS/DESCRIPTIONS

On August 22, 1989, at 1615 HRS. I received a complaint from Steve Markowski concerning Methyl Ethyl Ketone (MEK) spill at Stone Industrial located at 51st avenue and Cree lane, College Park, MD. 20740 in Prince George county.

I arrived at the scene at 1645 HRS and observed approximately three to four hundred gallon of MEK spilled from the underground tank number 2 located at the east side of building number 2.

The MEK overflowed from tank number 2 to the property of the City of College Park Department of public Works and to the near by railroad track. The cause of the spill is unknown. Mr. John Hager, a representative of Stone Industries believed that the 50 years old MEK tank might have a hole which the rain water entered and forced the MEK to overflow through the fill pipe.

Stone Industries has two 750 gallon capacity ~~more~~ underground tanks for MEK which has never been tested for leak. According to Mr. Hager "On August 16, 1989 the company had purchased 1007 gallons of MEK and used 7.9 gallons since then." At present tank number 2 contains 650 gallons and tank number 3 contains 90

E 205

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224

INCIDENT REPORT

Part II Sequence _____

COMMENTS/DESCRIPTIONS

gallons of MEK.

Stone Industries is advised to make the following corrective actions immediately.

1. Clean all contaminated soil

2. Write a letter of explanation to the Hazardous and Solid Waste Management Administration explaining the exact cause of the spill

3. After clean up analyze the soil to determine if any contaminant remains in the soil.

RESULTS OF SAMPLING AND ANALYSIS AT STONE INDUSTRIAL SITE COLLEGE PARK, MARYLAND 23 AND 24 AUGUST 1989

Prepared for:

Stone Industrial

Prepared by:

EA Mid-Atlantic Regional Operations
EA Engineering, Science, and Technology, Inc.

September 1989

EA Project 11263.01

RESULTS OF SAMPLING AND ANALYSIS AT STONE INDUSTRIAL SITE COLLEGE PARK, MARYLAND 23 AND 24 AUGUST 1989

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September 1989

EA Project 11263.01

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APPENDIX A: ANALYTICAL DATA

1. INTRODUCTION

On 23 August 1989 Stone Industrial contacted EA Engineering, Science and Technology in connection with a spill of methyl ethyl ketone (MEK) from an overfilled underground storage tank on the Stone Industrial property. EA was contracted to collect soil samples that same day to assess the concentration of MEK remaining in soil along the flow path of the spill. The agreed upon work plan specified that the samples would be analyzed for MEK only. Preliminary results would be reported within one week to be followed by a formal written report detailing sample locations, methods, and final results of analyses.

2. SITE LOCATION AND HISTORY

Stone Industrial is located at 51st and Cree Lane, College Park, Md. (Figure 1). The spill occurred during mid-day on 22 August 1989 from an underground storage tank located near the northwestern corner of Building # 2 (Figure 2). Almost immediately, the spill crossed a fence line onto property of the College Park Public Works Department. The spill migrated eastward across Public Works property deflecting around embankments and large pieces of debris or abandoned equipment. After crossing under another fence at the eastern border of the property, the MEK formed a 1 ft deep pool adjacent to a set of railroad tracks. At this point the leak was discovered and shut off at the source. Plant personnel reacted quickly by damming up the spill at the railroad tracks with sand to prevent further migration. Within 24 hours plant personnel had removed most of the upper 1 ft of soil along the determined spill pathway and containerized it in sealed 55 gallon drums. EPA and state agencies were notified, and the site was inspected by personnel from these departments. The excavated area was covered with plastic to prevent infiltration of rain water.

3. METHODS

3.1 SAMPLE LOCATION

An initial survey of the site was made with plant personnel to select sampling locations near the tank and along the excavated flow path of the spill. Nine surface sample locations were selected. From three of these locations, a deeper sample at 3 ft depth was taken to assess the penetration of MEK. A shallow and a deep sample (SS- 1A, 1B) was located in undisturbed soil next to the tank to assess surficial MEK levels and MEK depth of penetration close to the source. Other samples (SS-5, SS-7A, 7B, SS-8A, 8B) were assigned to areas where MEK was known to have pooled. Surface samples SS-3, SS-4, and SS-6 were placed between MEK accumulation points to assess the degree of soil absorption in transport zones versus accumulation zones of the spill pathway. According to plant personnel, SS-4 was taken in an area paved with asphalt prior to the spill. Sample SS-9 was situated beyond the furthest extent of the spill as determined by plant personnel. The purpose of this sample was to confirm spill extent.

3.2 SAMPLE COLLECTION

Surface samples were collected with stainless steel trowels. Deeper samples were collected with stainless steel hand augers. All samples were placed in laboratory cleaned soil jars capped with teflon sheeting and a screw-top lid to prevent loss of volatile organic compounds. During sampling a photoionization detector (PID) was used to measure organic vapors in the air. Measurements were made in the breathing zone, at the ground surface, and in the subsurface after excavation.

Sampling equipment was decontaminated between sampling locations by rinsing with deionized water, methanol, and a second rinse of deionized water. A field blank was taken during the sampling process to confirm the efficiency of decontamination procedures.

In total twelve soil samples were collected by EA personnel on 23 August 1989. A trip blank was included with these samples to monitor for contamination introduced during transport. An additional composite sample consisting of surficial soil from each of the sampling locations was collected by plant personnel on 24 August 1989 and delivered to EA for analysis, bringing the total number of soil samples to thirteen.

All samples were analyzed for MEK by EPA Solid Waste Method 80240 using a gas chromatograph and mass spectrometer (GC/MS) Standard EA quality control and quality assurance practices were followed.

4. RESULTS

4.1 ORGANIC VAPOR READINGS

Table 1 presents the readings obtained with a PID during sampling on 23 August 1989. Readings were highest near the tank and in areas where MEK had pooled. The odor of MEK was generally noticeable at these locations. Lower readings were obtained in areas between accumulation zones where rapid flow of MEK predominated. The low readings at sample location SS-4 may be due to the presence of asphalt paving, subsequently removed during spill excavation, which retarded absorption of MEK into the ground.

4.2 ANALYTICAL RESULTS

MEK concentrations for soil samples collected on 23 August 1989 are shown in Table 2. The highest concentrations were present near the tank and in the accumulation zone near the railroad tracks. The only 3 ft depth sample with MEK concentration over 1mg/kg was 1B, near the tank. While taking samples 7A, 7B and 8B, water was encountered at depths of 4 in., 3 ft, and 1.5 ft respectively.

4.3 SUMMARY

MEK is still present in the soil along the length of the spill path.

MEK concentrations are highest near the UST with secondary highs in areas where MEK temporarily accumulated (SS-2, SS-5, SS-7A, SS-7B).

MEK has penetrated at least 3 ft deep into the soil close to the tank (SS-1B) although it's concentration is several orders of magnitude less than at the surface.

The presence of asphalt paving along the flow spill path between sample points SS-3 and SS-5 appears to have reduced infiltration of MEK into the

underlying soil. This is reflected by the low concentrations of MEK detected in sample SS-4.

A trace level of MEK was detected in sample SS-9 which was taken outside the estimated extent of spill migration.

TABLE 1 PID READINGS[a]

Sample	Surface (+0.5 ft) (ppm)	0.05 ft (ppm)	3 ft (ppm)
1A	50-150	220	
B			>2,000
2	15		
3	14	5	
4	2-3	<1	
5	2-3	5	
6	7	4	
7A	50	100	
B	20		8
8A	0	0	
B			0
9	0	0	

(a) total photoionizable compounds

TABLE 2 LEVELS OF MEK IN SOIL SAMPLES FROM STONE INDUSTRIAL MEK SPILL (23 AUG 1989) CONCENTRATION OF MEK (mg/kg)

Sample No.	
1A	12,000
1B	170
2	12
3	3.7
4	1.4
5	22
6	7.6
7A	1,400
7B	0.88
8A	Trace
8B	0.088
9	0.039
Composite	14
Trip Blank	ND
Field Blank	Trace

ND = Not detected.
Trace = Present but less than detection limit (20 µg/kg).
B = Samples taken from 3 ft deep. All other samples are from surface.

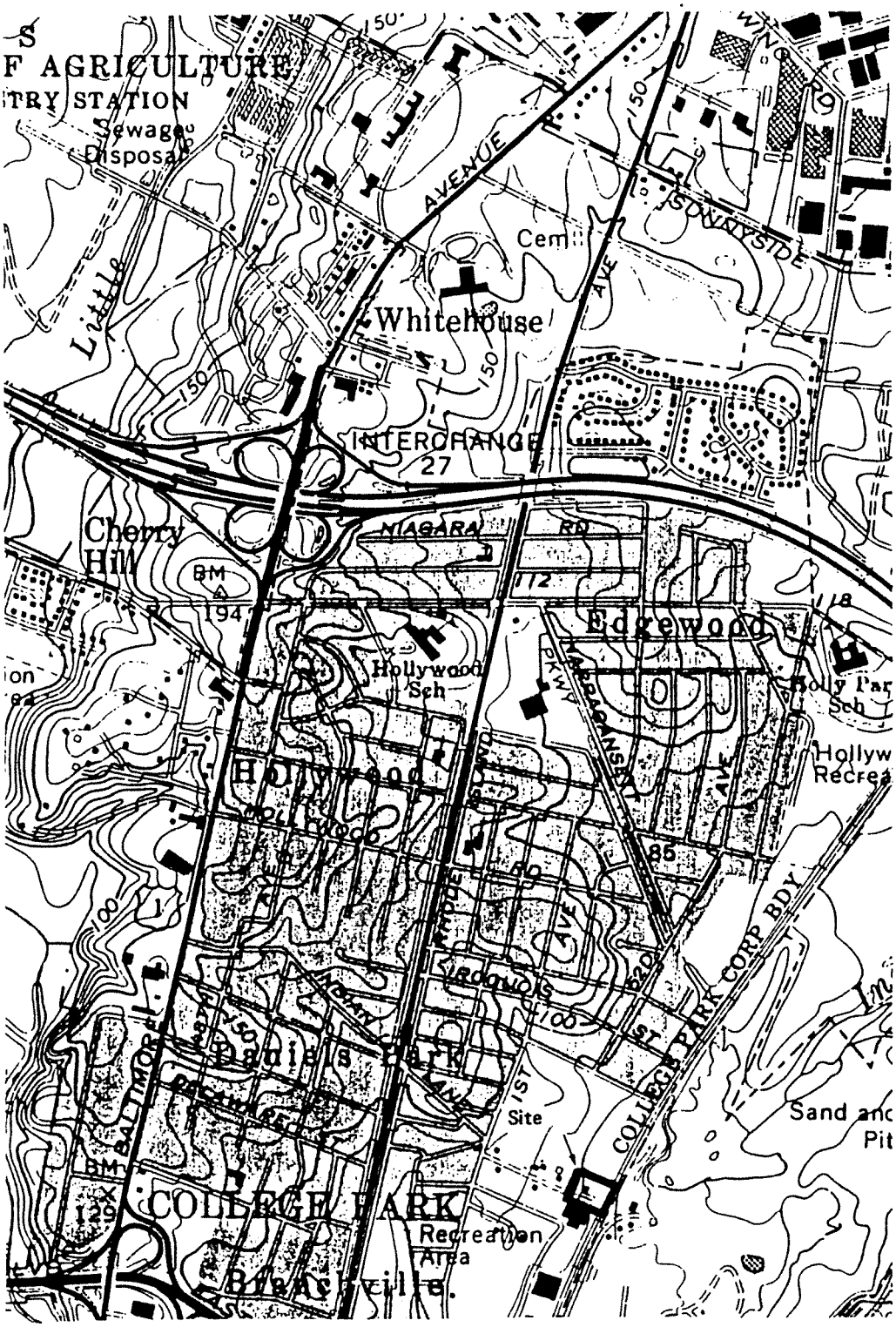


Figure 1. Stone Industrial Site.

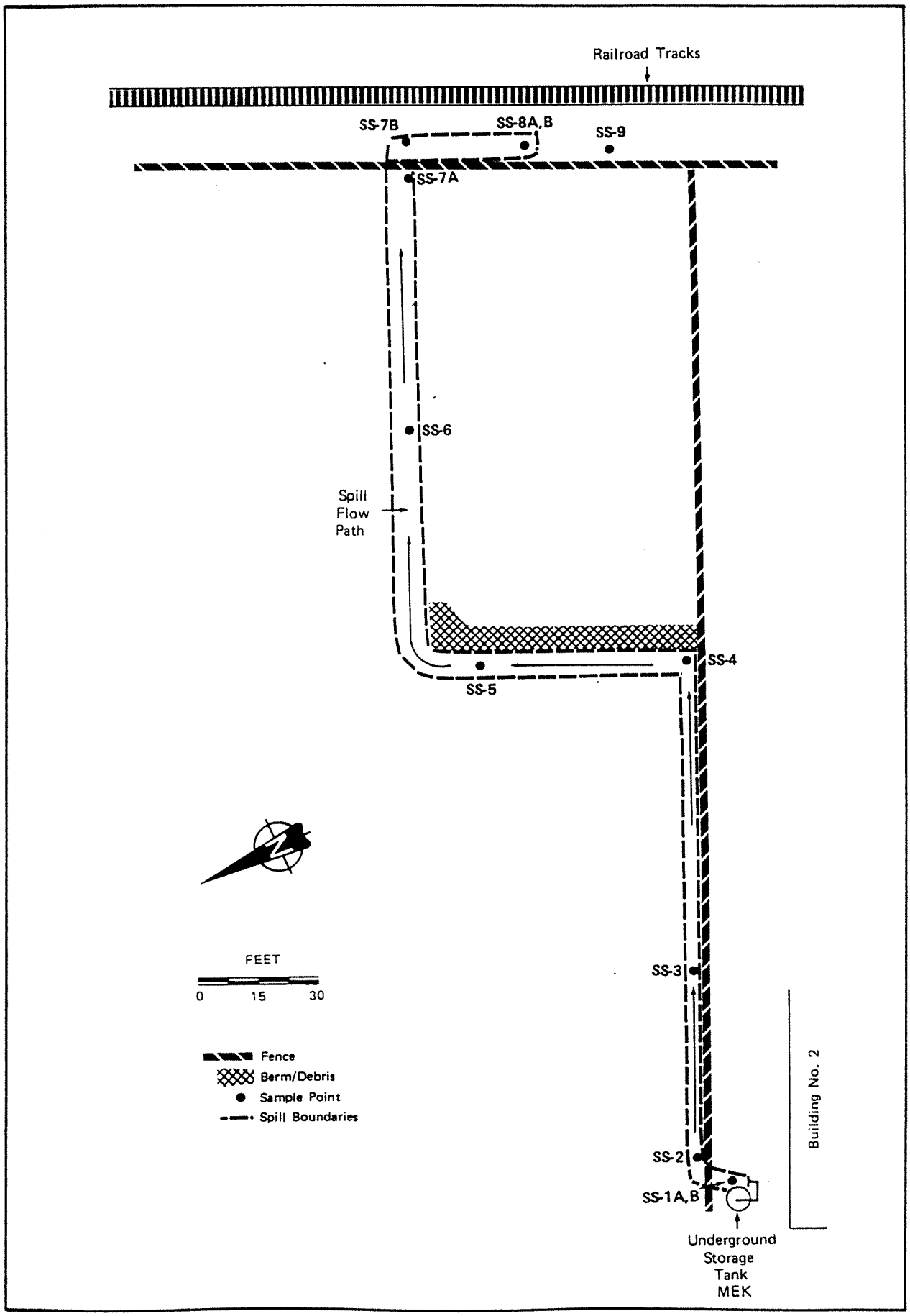


Figure 2. Site Map — Stone Industrial, MEK Spill Site.

APPENDIX A: ANALYTICAL RESULTS

INDIVIDUAL DATA SHEETS
Volatiles - 624

MEMORANDUM

DATE: 31 August 1989

TO: Gregg Campbell, Project Manager

FROM: Robert S. Runkle, Vice President, EA Laboratories

SUBJECT: Stone Industries (11263.01)

This is to report the analytical results for 13 soil samples collected at Stone Industries on 23 and 24 August 89. 2-Butanone was determined according to U.S. EPA Method 8240.

Preliminary data was given to you on 30 August 1989.

In accepting analytical work, EA Laboratories, a division of EA Engineering, Science, and Technology, Inc., warrants the test results to be of precision normal for the sample type and methodology employed for each sample as submitted. The methods indicated were employed as stated to the extent permitted by sample and/or matrix limitations, if any. EA disclaims any other warranties, express or implied, including warranty of fitness for a particular purpose and warranty of merchantability. Also, EA accepts no legal responsibility for the purpose for which the client uses test results. EA cannot accept any terms and conditions on purchase orders, work orders, or requests, and any analytical work performed by EA must be governed by the terms and conditions set forth herein.

Please contact me if you have any questions or require further information. Refer to report number 890568.

RSR/rep
enclosure

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 3996
Sample: SS-1A
GC/MS Data File: >EG488::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/25/89 19:44
Sample Wt/Vol: 5.00 GM
Dilution Factor: 100000.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	12000000.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 3997
Sample: SS-1B
GC/MS Data File: >EG479::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/25/89 12:10
Sample Wt/Vol: 5.00 GM
Dilution Factor: 1250.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	170000.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 3998
Sample: SS-2
GC/MS Data File: >EG480::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/25/89 12:59
Sample Wt/Vol: 5.00 GM
Dilution Factor: 250.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	12000.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 3999
Sample: SS-3
GC/MS Data File: >EG481::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/25/89 13:44
Sample Wt/Vol: 5.00 GM
Dilution Factor: 125.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	3700. .

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kOS
kOS

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4000
Sample: SS-4
GC/MS Data File: >EG482::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/25/89 15:13
Sample Wt/Vol: 5.00 GM
Dilution Factor: 5.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	1400.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kOS
kOS

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4001
Sample: SS-5
GC/MS Data File: >EG483::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/25/89 15:58
Sample Wt/Vol: 5.00 GM
Dilution Factor: 125.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	22000.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4002
Sample: SS-6
GC/MS Data File: >EG484::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/25/89 16:44
Sample Wt/Vol: 5.00 GM
Dilution Factor: 125.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	7600.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4003
Sample: SS-7A
GC/MS Data File: >EG492::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/28/89 10:28
Sample Wt/Vol: 5.00 GM
Dilution Factor: 2500.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	1400000.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4004
Sample: SS-7B
GC/MS Data File: >EG494::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/28/89 12:58
Sample Wt/Vol: 5.00 GM
Dilution Factor: 5.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	880.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4005
Sample: SS-8A
GC/MS Data File: >EG464::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/24/89 15:16
Sample Wt/Vol: 5.00 GM
Dilution Factor: 1.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	10. TR

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4006
Sample: SS-8B
GC/MS Data File: >EG465::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/24/89 16:01
Sample Wt/Vol: 5.00 GM
Dilution Factor: 1.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	88.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4007
Sample: SS-9
GC/MS Data File: >EG463::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/24/89 14:30
Sample Wt/Vol: 5.00 GM
Dilution Factor: 1.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	39.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4008
Sample: FIELD BLANK
GC/MS Data File: >EG462::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/24/89 13:45
Sample Wt/Vol: 5.00 GM
Dilution Factor: 1.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	20. TR

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kOS
kOS

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4009
Sample: TRIP BLANK
GC/MS Data File: >EG461::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/24/89 12:59
Sample Wt/Vol: 5.00 GM
Dilution Factor: 1.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	20. ND

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: EA# 4010
Sample: SOIL SAMPLE
GC/MS Data File: >EG487::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/25/89 18:59
Sample Wt/Vol: 5.00 GM
Dilution Factor: 250.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	14000.

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: METHOD BLANK
Sample: VBLK
GC/MS Data File: >EG460::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/24/89 12:13
Sample Wt/Vol: 5.00 GM
Dilution Factor: 1.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	20. ND

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: METHOD BLANK
Sample: VBLK
GC/MS Data File: >EG477::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/25/89 10:37
Sample Wt/Vol: 5.00 GM
Dilution Factor: 1.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	20. ND

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kos
kos

EA LABORATORIES
ORGANICS ANALYSIS DATA SHEET
VOLATILE COMPOUNDS

Client: STONE INDUSTRIES
Lab No: METHOD BLANK
Sample: VBLK
GC/MS Data File: >EG491::D2
Instrument Id: 7002E5

Matrix: SOIL
Date Rec'd: 08/24/89
Date Analyzed: 08/28/89 09:09
Sample Wt/Vol: 5.00 GM
Dilution Factor: 1.00

CAS #		CONC UG/L OR UG/KG
78-93-3	2-Butanone	20. ND

Qualifier descriptions: ND - Compound analyzed for but not detected
Number present is method detection limit
TR - Present but less than detection limit
B - Compound detected in method blank

kOS
kOS

183

Chain of Custody Record

EA Laboratories
15 Loveton Circle
Sparks, MD 21152
301-771-4950

Company Name: EA

Project Manager or Contact: Gregg Campbell

Project No.: 11263.01

Project Name: Stone Industries

Special QA Protocols (Circle): EPA-CLP, USATHAMA, TIER I (NJ), TIER II (NJ), OTHER (SPECIFY) EA

Parameters for Analysis: VOA - MEK only

Date	Time	Grab	Comp	Sample Identification (I.D. and Matrix)	No. of Containers	VOA - MEK only	EA Labs Accession Number	Remarks
8/23/89	1439	+		SS-1A, Soil	1	✓	3996	Very high [ ]
	1467	+		SS-1B, Soil	1	✓	3997	Very high [ ]
	1513	X		SS-2, Soil	1	✓	3998	Moderate [ ]
	1526	X		SS-3, Soil	1	✓	3999	Moderate [ ]
	1535	X		SS-4, Soil	1	✓	4000	Low [ ]
	1626	X		SS-5, Soil	1	✓	4001	Moderate [ ]
	1637	X		SS-6, Soil	1	✓	4002	Moderate [ ]
	1647	X		SS-7A, Soil	1	✓	4003	High [ ]
	1702	X		SS-7B, Soil	1	✓	4004	High [ ]
	1720	X		SS-8A, Soil	1	✓	4005	Very Low [ ]
	1730	X		SS-8B, Soil	1	✓	4006	Very Low [ ]
	1733	X		SS-9, Soil	1	✓	4007	Clean [ ]
	1807	X		Field Blank, Water	2	✓	4008	Air bubbles in bottle
8/23/89	—	X		Trip Blank, Water	1	✓	4009	O.K.

1 Week turnaround.

Sampled by: (Signature)	Title:	Date/Time	Relinquished by: (Signature)	Date/Time	Received by: (Signature)
Gregg T. Campbell	Geologist II	8/23/89 0956	Gregg T. Campbell	8/23/89 0956	

Relinquished by: (Signature)	Date/Time	Recieved by: (Signature)	Relinquished by: (Signature)	Date/Time	Rec'd. by Lab. (Signature)
				8/24/89 10:05	Mary E Cope

Sample Custody Notes: Cooler temp = 4°C

due 31 Aug '89

890568

Sample Shipped by: (Circle) Fed. Ex. Purol. UPS Other (Specify) Hand carried

Air Bill Number:

EA 0396 6/3/88 White EA Sample Custody

684

Chain of Custody Record

EA Laboratories
15 Loveton Circle
Sparks, MD 21152
301-771-4950

Company Name: EA

Project Manager or Contact: Gregg Campbell

Project No.: 11263.01

Project Name: Stone Industries

Special QA Protocols (Circle): EPA-CLP, TIER I (NJ), OTHER (SPECIFY) EA, USATHAMA, TIER II (NJ)

Parameters for Analysis: VOA (Meb only)

Date	Time	Grab	Comp	Sample Identification (I.D. and Matrix)	No. of Containers	VOA (Meb only)	EA Labs Accession Number	Remarks
8/24/89	1330(?)		X	Composite Sample, Soil	1		4010	Moderate - High [ ]
								1 week turnaround
								Please batch with EA # 3996 - 4009

Sampled by: (Signature)	Title:	Date/Time	Relinquished by: (Signature)	Date/Time	Received by: (Signature)
Steve Lieb	Personnel	8/24/89 1500		8/24/89 1500	Gregg T. Campbell

Relinquished by: (Signature)	Date/Time	Recieved by: (Signature)	Relinquished by: (Signature)	Date/Time	Rec'd. by Lab: (Signature)
				8/24/89 305	Mary E Asper

Sample Custody Notes: Cooler temp = 2°C

890568

Sample Shipped by: (Circle) Fed. Ex. Puro. UPS

Other (Specify) Hand carried

Air Bill Number:

EA 0396 6/3/88 White EA Sample Custody

_____ NRC NOTIFIED
(1-800-424-8802)

W E MANAGEMENT ADMINISTRATIO
INCIDENT REPORT FORM

P.G. County

ER 89-08-22-PG-0033

Received By: S. Machamer
Print

Part I

A. INCIDENT NUMBER 89 08 22 _____
YR MO DAY SEQUENCE

Spill: Yes ✓ No _____ If spill, give level:

B. TIME NOTIFIED — 24 HOUR CLOCK _____

C. LEVEL — 1 _____ MINOR 2 _____ MEDIUM 3 ✓ MAJOR (See Reverse)

D. NOTIFIER: Name John Hager Address 51st Ave. Cree Lane
Telephone 301-345-2367 College Park, MD 20740 (Zip)

E. LOCATION/ADDRESS OF INCIDENT
MEDIUM AFFECTED:

1 ✓ Surface Water
2 _____ Air
3 _____ Soil/Paved
4 _____ Groundwater
5 _____ See Part II

6 _____ Street/Cross Street
_____ City
_____ County
_____ Zip

F. RESPONSIBLE PARTY
STONE INDUSTRIES (Name)
51st AVE AND CREE LANE (Address)
College Park MD 20740 (Zip)
301 - 345 - 2367 (Area Code) (Telephone)

G. NATURE OF INCIDENT

1 ✓ Chemical MEK (Specify)
2 _____ CHS _____ UN Number
3 _____ Landfill
4 _____ Point Source Discharge
5 ✓ Storage Tank
6 _____ Open Dumping
7 _____ Well Contamination
8 _____ Sedimentation
9 _____ Surface H_2O Quality
10 _____ Oil
11 _____ Transfer Operation
12 _____ Aquatic Kill
13 _____ Sludge/Sewage
14 _____ Compressed Gas Cylinder
15 _____ Other _____

H. CAUSE

1 ✓ Industrial
2 _____ Marine
3 _____ Transportation
4 _____ Mechanical Failure
5 _____ Operator Error
6 _____ Apparent Vandalism
7 _____ Unknown
8 _____ Other _____

I. MANIFEST NUMBER & STATE _____

1 _____ N/A
2 _____ Generator
3 _____ Hauler
4 _____ Disposal

_____ Name
_____ EPA ID No.
_____ Name
_____ EPA ID No.
_____ Name
_____ EPA ID No.

5 _____ Other States
6 _____ See Attachment

J. CLEAN UP: 1 _____ N/A
2 _____ State _____ Organization _____ Person In Charge
3 _____ Local _____ Organization _____ Person In Charge
4 ✓ Industry STONE INDUSTRIAL (Organization) JOHN HAGER (Person In Charge)
5 _____ Contractor _____ Organization _____ Person In Charge

K. SPILL (Estimated Quantity)
1 _____ Potential 4000 gal. MEK
2 ✓ Spilled _____
3 ✓ Recovered _____
4 _____ N/A

L. COSTING
1 _____ Man-Hours _____ Hours
2 _____ Vehicle _____ Hours
3 _____ Total Incident Cost $_____ (Supervisor)

M. CASE STATUS
1 _____ File Created/Open
2 ✓ Closed
3 ✓ Referred To Other Agency/Div
UST DIVISION on 08-23-89
4 _____ Rescheduled Previous Action
5 _____ Unfounded Complaint

N. PERSON(S) MAKING REPORT (PRINT)
Name(s) Jennie Retta.

O. REVIEWED FOR CLOSURE BY:
Arthur O'Donnell

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE
MANAGEMENT ADMINISTRATION
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224

INCIDENT
REPORT

Part II Sequence _____

COMMENTS/DESCRIPTIONS

On August 22, 1989, at 1645 HRS. I received a complaint from [redacted] concerning Methyl Ethyl Ketone (MEK) spill at Stone Industrial located at 51st avenue and Cree lane, College Park, MD. 20740 in Prince George county.

I arrived at the scene at 1645 HRS and observed approximately three to four hundred gallon of MEK spilled from the underground tank number 2 located at the east side of building number 2.

The MEK overflowed from tank number 2 to the property of the City of College Park Department of public Works and to the nearby railroad tracks. The cause of the spill is unknown. Mr. John Hager, a representative of Stone Industries believed that the 50 years old MEK tank might have a hole which the rain water entered and forced the MEK to overflow through the fill pipe.

Stone Industries has two 750 gallon capacity ~~more~~ underground tanks for MEK which has never been tested for leak. According to Mr. Hager "On August 16, 1989 the company had purchased 1007 gallons of MEK and used 7.9 gallons since then." At present tank number 2 contains 650 gallons and tank number 3 contains 90

)E 205

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224

INCIDENT REPORT

Part II Sequence _____

COMMENTS/DESCRIPTIONS

gallons of MEK.

Stone Industries is advised to make the following corrective actions immediately.

1. Clean all contaminated soil

2. Write a letter of explanation to the Hazardous and Solid Waste Management Administration explaining the exact cause of the spill

3. After clean up analyze the soil to determine if any contaminant remains in the soil.

STONE INDUSTRIAL
a member of the CLARCOR precision products group

August 24, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED
AUG 25 1989
HSWMA
ENFORCEMENT PROGRAM

Mr. Arthur O'Connell
Sectional Chief of Hazardous and Solid Waste
Management Administration
Department of Environment
2500 Broening Highway
Baltimore, MD 21224

Dear Mr. O'Connell:

CLARCOR
Stone Industrial Division
51st Avenue & Cree Lane
College Park, MD 20740

August 22, 1989 2:20 p.m.

(301) 474-3100 (24 hours)
(301) 474-3103 (Plastics Night Shift)
(301) 474-3102 (Paper Tube Night Shift)

Incident Report:	Report No. 14751 (MEK Spill) National Response Center
Date of Incident:	Tuesday, August 22, 1989
Time of Incident:	Approximately 2:30 - 2:45 p.m.
Notification:	National Response Center (800) 424-8802
Time Notified:	Approximately 3:10 - 3:15 p.m.
Notification:	Maryland State Department of Health & Mental Hygiene Office of Environmental Programs (301) 631-3386
Time Notified:	Approximately 3:00 - 3:05 p.m.
Site Location:	1. 51st Avenue & Cree Lane College Park, MD 20740 2. City of College Park Public Works Department 9219 - 51st Avenue College Park, MD 20740

Type Incident:	Methyl Ethyl Ketone (MEK) spill from underground tank
Quantity:	Approximately 449 gallons (3,030 lbs.)
Material:	Methyl Ethyl Ketone (MEK) C.A. SRN No. 78933
Injuries:	No personal injuries

MEK overflowed from the fill spout onto the ground flowing approximately 10 feet North onto the City of College Park Public Works Department located at 9219 - 51st Avenue. MEK at the fence line turned East at a right angle 40 yards, turned North 20 yards, turned Northeast flowing approximately 50 yards to the fence line. The MEK continued to the South side of the fence

51st Avenue & Cree Lane
College Park, Maryland 20740-1995
301/474-3100
FAX: 301/345-2367

immediately turning South and was stopped 10 feet down. Three sand dams were constructed down from the end point of the flow for containment. A Stone Industrial spill team was immediately dispatched to the scene. Within 30 minutes the National Response Center and the Maryland State Department of Health and Mental Hygiene Office were notified. The City of College Park Public Works Department were immediately briefed of the spill.

The City of College Park Public Works Department was kept informed as the spill was contained and cleanup proceeded into the night. Stone Industrial accepted full responsibility and received total cooperation from the Public Works Office.

At approximately 4:30 p.m. I received a call from Ms. Hillary Miller of the State EPA advising that Mr. Nigussie Retta would be on site for an evaluation. Mr. Retta arrived and reviewed the cleanup. We gave the best assessment of the spill during his visit. We were unable to give conclusive evidence of cause and quantity of the spill. We explained that we anticipated approximately 250 gallons of MEK may have been spilled. The estimated spill after a thorough review shows that we emitted about 449 gallons. We asked Mr. Retta if B & O Railroad should be notified since we were within 20 feet of the railroad. He said it was not necessary . Mr. Retta suggested, with our concurrence, to bring in a backhoe to excavate a trench of the path of the flow. Mr. Jack Nazario from NZI Contracting was hired August 22 to dig the trench. Mr. Nazario, operating the backhoe with Stone's spill team of 28, trenched out the path of the spill containing the contaminated dirt into 106 55-gallon steel drums. The crew worked from 3:00 p.m. to 11:30 p.m. The trench and spill location was covered with plastic to prevent rain and other elements from entering the spill site. At 11:30 p.m. the site was contained and cleaned up.

On August 23, 1989 the evaluation of the spill continued. Stone and Hoover Industries were notified to do tank testing. Ecoflo, Inc. was notified and Mr. Chris Jubock visited the site for an assessment. EA Engineering Sciences was contacted and 12 soil samples were taken by Gregg Campbell of the company. The location of samples taken by Mr. Campbell were marked.

I contacted Mr. Retta at 2:30 p.m. on August 23 to update him on our progress. I explained to Mr. Retta that we wanted to bring the contained soil in the drums back to our property from the property of the City of College Park Public Works Department. Mr. Retta explained that we could open the fence and move it across to our property. He then explained that a representative from the underground storage tank division will visit the facility and advise us of what procedures are required based upon the assessments made thus far. Additional reports will be forthcoming as progress continues.

Possible Hazards:

Methyl Ethyl Ketone is extremely flammable. The vapors are harmful in high concentrations and may cause irritation to the eyes and upper respiratory system upon inhalation. A Material Safety Data Sheet is enclosed for complete emergency and first aid advice.

Sincerely yours,

STONE INDUSTRIAL
CLARCOR Precision Products Group

John B. Hager

John B. Hager
Chief Chemist

JBH:jmd

cc: Nigussie Retta, Public Health Engineer

John H. Easto, Chief Engineer
Maurie Johnson, Group Vice President Precision Products, CLARCOR
Stephen A. Lieb, Personnel Director, Stone Industrial
David Lindsay, Corporate Personnel Director, CLARCOR
Timothy E. Kartisek, General Manager, Stone Industrial
Dennis McGarity, Director of Manufacturing, Stone Industrial

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial, CLARCOR Precision Products Group

EPA ID NO. MDD058594920

PRIVATE

CONFIDENTIAL

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1988 Hazardous Waste Report and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1988

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Waste Flammable Liquid from spent polyester adhesive used in manufacture of plastic tube winding.

B. EPA hazardous waste code (Page 12): F005 F002 NA NA

C. State hazardous waste code (Page 13): NA NA NA

D. SIC code (Page 13): 2649

E. Source code (Page 13): 10

F. Waste form code (Page 13): 451

G. Waste minimization results (Page 13): A

Sec. II

A. Organics (Instruction Page 14): High G; Low D; Test A; Note

B. Water (Page 15): High Q; Low U; Note N

C. Total Solids (Page 15): High D; Low G; Note

D. Suspended Solids (Page 15): High D; Low G; Note

E. BTU (Page 16): High 10.0; Low 9.0; UOM P; Note

F. Toxic Metals (Page 16) Note A

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH (Page 18): High 8.0; Low 7.0; Note

H. Flashpoint (Page 18): High 54 °F; Low °F; Note

I. Cyanides (Page 19): High 7; Low; Test; Note

J. Halogens (Page 20): High P; Low; Note

K. Radioactive (Page 20): Yes ☐; No ☒; Note

Sec. III

A. 87 quantity hazardous waste generated (Instruction Page 20): 78050

B. 88 quantity hazardous waste generated (Page 20): 35100

C. UOM (Page 21): P

D. Density (Page 21): 0.8 - 1.0 ☐ lbs/gal ☒ sg

E. Quantity hazardous waste on site on January 1, ~~XXXX~~ 1988 (Page 21): 000000000

F. Quantity hazardous waste remaining on site on December 31, 1988 (Page 21): 000000000

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22): NJD002454544

B. Number of shipments (Page 22): 003

C. Transport mode (Page 22): H

D. Off-site T/S/D/R code (Page 22): M20

E. Total quantity shipped (Page 22): 35100

Comments:

SEC. VI. Does this site's EPA ID authorize hazardous waste generation?

- [ ] NO —— SKIP TO SECTION VII.
- [x] YES —— Did this site generate any hazardous waste during 1988
  - [x] YES —— READ DETAILED INSTRUCTION ON PAGE 9 OF 1988 HAZARDOUS WASTE GENERATION AND SHIPMENT REPORT INSTRUCTIONS BOOKLET FOR ACUTE AND ACCUMULATION LIMITS. MARK [X] NEXT TO THE HAZARDOUS WASTE GENERATION QUANTITY CATEGORY THAT APPLIED TO THIS SITE DURING 1988
    - [x] Category 1: More than 1000 kg (2,200 lb) in one or more months
    - [ ] Category 2: More than 100 kg (220 lb) but no more than 1000 kg (2,200 lb) in any single month
    - [ ] Category 3: No more than 100 kg (220 lb) in any single month
      - [ ] Mark [X] if this site changed from Category 1 to Category 2 or 3 due to waste minimization activity conducted during 1987 or 1988
  - [ ] NO —— CONTINUE BELOW, MARK [X] NEXT TO ALL THAT APPLY.
    - [ ] Generated, excluded or delisted wastes
    - [ ] Generated hazardous waste prior to 88 but do not expect to generate in the future - MARK [X] FOR REASON IN ONE BOX BELOW
      - [ ] Waste was from one-time event(s) (e.g. spills; remedial actions, etc.)
      - [ ] Waste minimization activity undertaken during 1987 1988
      - [ ] Out of business
    - [ ] Generated hazardous waste prior to 88 and expect to generate in the future
    - [ ] Never generated before but expect to generate in the future
    - [ ] Never generated and do not expect to generate in the future - MARK [X] FOR REASON IN ONE BOX BELOW
      - [ ] Protective notifier only
      - [ ] Misunderstood the requirements
      - [ ] Notified to secure transportation services
      - [ ] Other EXPLAIN REASON FOR GENERATOR NOTIFICATION IN COMMENTS

SEC. VII. Does this site have RCRA Interim Status or a RCRA permit to treat, store, or dispose hazardous waste?

- [x] NO —— SKIP TO SECTION VIII
- [ ] YES —— Did the site treat, store, or dispose (T/S/D) hazardous waste in RCRA-regulated units during 1988
  - [ ] YES —— SKIP TO SECTION VIII
  - [ ] NO —— CONTINUE BELOW, MARK [X] NEXT TO ALL THAT APPLY
    - [ ] T/S/D excluded waste during 1988
    - [ ] T/S/D hazardous waste in exempt units during 1988
    - [ ] T/S/D hazardous waste prior to 88 but did not T/S/D waste during 88 MARK [X] IN ONE BOX BELOW
      - [ ] T/S/D will resume in the future
      - [ ] Have notified of planned closure
      - [ ] Site is in closure or post closure
    - [ ] Never T/S/D hazardous waste prior to 88 but: MARK [X] IN ONE BOX BELOW
      - [ ] Expect to T/S/D hazardous waste in the future
      - [ ] Do not expect to T/S/D hazardous waste in the future - EXPLAIN REASON FOR INTERIM STATUS OR PERMIT IN COMMENTS

SEC. VIII. Do you wish to withdraw this site's generator notification or EPA Part A permit application?

Withdraw generator notification	[ ] Yes	[ ] No
Withdraw Part A permit application	[x] Yes	[ ] No

SEC. IX. Does this site have an area not requiring a RCRA Part A or Part B permit that is used exclusively for the short term accumulation of hazardous waste?

- [ ] NO
- [x] YES —— DOES THE AREA HAVE:

Containers	[ ] No	[x] Yes	ENTER THE NUMBER OF TANKS AND THEIR TOTAL CAPACITY IN GALLONS.
Tanks	[ ] No	[ ] Yes ——	[ ][ ][ ] Number [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ] Gallon capacity

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial, CLARCOR Precision Products Group

EPA ID NO. MDD058594920

CONFIDENTIAL

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1988 Hazardous Waste Report and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1988

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Hazardous Solid Waste from distilation of spent polyester adhesive.

B. EPA hazardous waste code (Page 12): F005 | NA | NA | NA

C. State hazardous waste code (Page 13): NA | NA | NA

D. SIC code (Page 13): 2649

E. Source code (Page 13): 10

F. Waste form code (Page 13): N50

G. Waste minimization results (Page 13): B

Sec. II

A. Organics (Instruction Page 14): High P; Low; Test A; Note

B. Water (Page 15): High 9; Low; Note N

C. Total Solids (Page 15): High A; Low B; Note

D. Suspended Solids (Page 15): High 9; Low; Note N

E. BTU (Page 16): High 9000; Low 10000; UOM P; Note

F. Toxic Metals (Page 16): Note A

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH (Page 18): High 8.0; Low 7.0; Note

H. Flashpoint (Page 18): High 54 °F; Low °F; Note

I. Cyanides (Page 19): High 9; Low; Test; Note

J. Halogens (Page 20): High R; Low U; Note

K. Radioactive (Page 20): Yes ☐; No ☒; Note

Sec. III

A. 87 quantity hazardous waste generated (Instruction Page 20): 2000

B. 88 quantity hazardous waste generated (Page 20): 17100

C. UOM (Page 21): P

D. Density (Page 21): 0.8 – 1.0; ☐ lbs/gal ☒ sg

E. Quantity hazardous waste on site on January 1, ~~XXXXX~~ 1989 (Page 21): 9000

F. Quantity hazardous waste remaining on site on December 31, 1988 (Page 21): 9000

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22)	B. Number of shipments (Page 22)	C. Transport mode (Page 22)	D. Off-site T/S/D/R code (Page 22)	E. Total quantity shipped (Page 22)
NCD980842132	002	H	M10	8100

Comments:
Sec. IV D. - Material generated from ECoflo of NC to Thermalkem for incineration.

OMB#: 2050-0024 Expires 12-31-

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME Stone Industrial, CLARCOR Precision Products Group

EPA ID NO. MDD058594920

FORM **IC**

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1988 Hazardous Waste Generation and Shipment Report

IDENTIFICATION AND CERTIFICATION

WHO MUST COMPLETE THIS FORM? Form IC must be completed by every site that received this package.

INSTRUCTIONS: Please read the detailed instructions beginning on page 8 of 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Complete Sections I through IV and Sections VI through IX immediately. Complete Section V, certification, after you have finished the full report package.

SEC. I. Site name and physical location which may differ from the mailing address. Complete items A through G. Mark [X] for items A, B, C, D, F, and G if same as label; if different, enter corrections. If label is absent, enter information.

A. Site/company name	B. EPA ID No.
Same as label [X] or —	Same as label [X] or —

C. Address number and street name of physical location - If not known, enter industrial park, building name or other physical location description
Same as label [X] or —

D. City, town, village, etc.	E. County	F. State	G. Zip Code
Same as label [X] or —	Prince George's	Same as label [X] or —	Same as label [X] or —

SEC. II. Mailing address of site. Mark [X] for A, B, C, and D if same as label; if different, enter corrections.

A. Number and street name of mailing address
Same as label [ ] or —

B. City, town, village, etc.	C. State	D. Zip Code
Same as label [ ] or —	Same as label [ ] or —	Same as label [ ] or —

SEC. III. Name, title, and telephone number of the person who should be contacted if questions arise regarding this report.

A. Please print: Last name / First name / M.I.	B. Title	C. Telephone
Hager, John B.	Chief Chemist	301 474-3100 Extension #205

SEC. IV. Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. SIC codes are listed beginning on page 1 of 1988 Hazardous Waste Report Codebook.

A.	B.	C.	D.	E.	F.
2649					

SEC V. 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. Please print: Last name / First name / M.I.	Title
Hager, John B.	Chief Chemist
B. Signature: John B. Hager	Date of signature: 05 (Mo.) 18 (Day) 89 (Yr.)

EPA Form 8700 - 13A (5-80) (Rev. 11-85) Revised (12-87)

OVER —>

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial, CLARCOR Precision Products Group

EPA ID NO.: MDD058594920

CONFIDENTIAL

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1988 Hazardous Waste Report and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1988

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Waste flammable solid from bagliners in drums; of pressure sensitive acrylic adhesive polyethylene bag containing residue.

B. EPA hazardous waste code (Page 12): D001

C. State hazardous waste code (Page 13): NA

D. SIC code (Page 13): 2649

E. Source code (Page 13): 10

F. Waste form code (Page 13): N89

G. Waste minimization results (Page 13): B

Sec. II

A. Organics (Instruction Page 14): High F; Low; Test A; Note

B. Water (Page 15): High N; Low; Note N

C. Total Solids (Page 15): High A; Low; Note

D. Suspended Solids (Page 15): High; Low; Note N

E. BTU (Page 16): High; Low; UOM; Note D

F. Toxic Metals (Page 16): Note A

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH (Page 18): High; Low; Note C

H. Flashpoint (Page 18): High °F; Low °F; Note B

I. Cyanides (Page 19): High; Low; Test; Note C

J. Halogens (Page 20): High; Low; Note N

K. Radioactive (Page 20): Yes ☐; No ☒; Note N

Sec. III

A. 87 quantity hazardous waste generated (Instruction Page 20): 10500

B. 88 quantity hazardous waste generated (Page 20): 8100

C. UOM (Page 21): P

D. Density (Page 21): 64.80 ☒ lbs/gal ☐ sg

E. Quantity hazardous waste on site on January 1, ~~XXXXX~~ 1988 (Page 21): 0000000000

F. Quantity hazardous waste remaining on site on December 31, 1988 (Page 21): 0000000000

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22): NCD980842132

B. Number of shipments (Page 22): 004

C. Transport mode (Page 22): 4

D. Off-site T/S/D/R code (Page 22): M79

E. Total quantity shipped (Page 22): 8100

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial, CLARCOR Precision Products Group

EPA ID NO.: MDD058594920

CONFIDENTIAL

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1988 Hazardous Waste Generation and Shipment Report

FORM **OI**

OFF-SITE IDENTIFICATION

WHO MUST COMPLETE THIS FORM? Form OI must be completed by every site that shipped hazardous waste off site and every site that received hazardous waste from off site during 1988

☐ Mark [X] if you are not required to complete Form OI.

INSTRUCTIONS: Please read the detailed instructions beginning on page 23 of 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Complete A through E for each off-site installation to which you shipped waste or from which you received waste during 1988

Complete A through D for every transporter you used during the reporting year.

Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable. Make and complete additional copies of this form if you need to identify more than four off-site installations or transporters.

Site 1

A. EPA ID No. of off-site installation or transporter Instruction page 23: MDD981739667

B. Name of off-site installation or transporter Page 23: Ecoflo Inc.

C. Site type code Page 24: T

D. Site relationship code Page 24: D

E. Address of off-site installation Page 24: Street ____ City ____ State ____ Zip Code ____

Site 2

A. EPA ID No. of off-site installation or transporter Instruction page 23: NCD980842132

B. Name of off-site installation or transporter Page 23: Ecoflo of North Carolina, Inc.

C. Site type code Page 24: K

D. Site relationship code Page 24: D

E. Address of off-site installation Page 24: Street 2750 Patterson Street; City Greensboro; State NC; Zip Code 24707-____

Site 3

A. EPA ID No. of off-site installation or transporter Instruction page 23: NJD002454544

B. Name of off-site installation or transporter Page 23: Marisol, Inc.

C. Site type code Page 24: F

D. Site relationship code Page 24: D

E. Address of off-site installation Page 24: Street 125 Factory Lane; City Middlesex; State NJ; Zip Code 08846-____

Site 4

A. EPA ID No. of off-site installation or transporter Instruction page 23: ____

B. Name of off-site installation or transporter Page 23: ____

C. Site type code Page 24: ____

D. Site relationship code Page 24: ____

E. Address of off-site installation Page 24: Street ____ City ____ State ____ Zip Code ____

Comments:

Site 1 was operated in conjunction with Chem Trans, Inc.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial,, CLARCOR Precision Products Group

EPA ID NO.: MDD058594920

CONFIDENTIAL

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1988 Hazardous Waste Report and Shipment Report

FORM WM

WASTE MINIMIZATION

PART I

WHO MUST COMPLETE THIS FORM?

Form WM Part I, describing efforts undertaken to implement waste minimization programs, must be completed by all generators required to file an Annual/Biennial Report. This requirement was established in response to statutory provisions included in the Hazardous and Solid Waste Amendments of 1984 (HSWA).

NOTE: Generators shipping hazardous waste off site are required to certify, on Item 16 of the Uniform Hazardous Waste Manifest, that they have a program in place to reduce, to the degree determined economically practicable, the volume and toxicity of hazardous waste generated. A similar certification must also be made by generators who have obtained a RCRA treatment, storage, or disposal permit. Consistent with these certification requirements, generators must report, on Form WM Part I, the efforts undertaken to implement waste minimization programs.

INSTRUCTIONS:

Please read the detailed instructions on page 25 of 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Answer questions 1 through 10. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

1. Did this site create or expand a source reduction and recycling program?

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Create	☐	☐	☐	☐	X	☐
Expand	X	☐	X	☐	☐	☐

2. Did this site have a written policy or statement that outlined goals, objectives and methods for source reduction and recycling of hazardous waste?

	1988	1987	Prior Years
Yes	X	X	X
No	☐	☐	☐

3. What was the dollar amount of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste? ENTER ZERO (0) IF NONE.

	1988	1987	Prior Years
Capital expenditures	$ 0	$ 0	$ 40K
Operating costs	$ UK	$ UK	$ UK

4. Did this site have an employee training program or provide incentives (bonuses, awards, personal recognition, etc.) to identify and implement source reduction and recycling opportunities and activities?

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Training	X	☐	X	☐	☐	X
Incentives	☐	X	☐	X	☐	X

OVER —>

5. Did this site conduct a source reduction and/or recycling opportunity assessment or audit? Note: an opportunity assessment or audit is a procedure that identifies practices that can be implemented to reduce the generation of hazardous waste or the quantity which must subsequently be treated, stored or disposed.

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Site-Wide	[X]	[ ]	[X]	[ ]	[X]	[ ]
Process-Specific	[X]	[ ]	[X]	[ ]	[X]	[ ]

6. Did this site identify or implement new SOURCE REDUCTION opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site?

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	[X]	[ ]	[X]	[ ]	[X]	[ ]
Implement	[X]	[ ]	[X]	[ ]	[X]	[ ]

7. What factors have delayed or prevented implementation of SOURCE REDUCTION opportunities. MARK [X] NEXT TO ALL THAT APPLY. NA

- [ ] a. Insufficient capital to install new source reduction equipment or implement new source reduction practices.
- [ ] b. Lack of technical information on source reduction techniques, applicable to my specific production processes.
- [ ] c. Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- [ ] d. Concern that product quality may decline as a result of source reduction.
- [ ] e. Technical limitations of the production processes.
- [ ] f. Permitting burdens.
- [ ] g. Other (SPECIFY) _____

8. Did this site identify or implement new RECYCLING opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site or subsequently treated, stored, or disposed of on site or off site?

	1988		1987		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	[X]	[ ]	[X]	[ ]	[X]	[ ]
Implement	[X]	[ ]	[X]	[ ]	[X]	[ ]

EPA ID NO. MDD 058594920

9. What factors have delayed or prevented implementation of on-site or off-site RECYCLING opportunities. MARK [X] NEXT TO ALL THAT APPLY. NA

- [ ] a. Insufficient capital to install new recycling equipment or implement new recycling practices.
- [ ] b. Lack of technical information on recycling techniques applicable to this site's specific production processes.
- [ ] c. Recycling is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- [ ] d. Concern that product quality may decline as a result of recycling.
- [ ] e. Requirements to manifest wastes inhibit shipments off site for recycling.
- [ ] f. Financial liability provisions inhibit shipments off site for recycling.
- [ ] g. Technical limitations of product processes inhibit shipments off site for recycling.
- [ ] h. Technical limitations of production processes inhibit on-site recycling.
- [ ] i. Permitting burdens inhibit recycling.
- [ ] j. Lack of permitted off-site recycling facilities.
- [ ] k. Unable to identify a market for recyclable materials.
- [ ] l. Other (SPECIFY) _____

10. Has this site requested or received technical information or financial assistance on source reduction and/or recycling practices from any of the following sources? MARK [X] NEXT TO ALL THAT APPLY.

	1988		1987		Prior Years	
	Technical	Financial	Technical	Financial	Technical	Financial
a. Local government	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
b. State government	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
c. Federal government	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
d. Trade associations	[X]	[ ]	[X]	[ ]	[X]	[ ]
e. Educational institutions	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
f. Suppliers	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
g. Other parts of your firm	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
h. Other firms/consultants	[X]	[ ]	[X]	[ ]	[X]	[ ]
i. No request made	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
j. Other (conferences, literature, etc.)_____	[X]	[ ]	[X]	[ ]	[X]	[ ]

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial, CALRCOR Precision Products Group

EPA ID NO.: M D D 0 5 8 5 9 4 9 2 0

CONFIDENTIAL

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1988 Hazardous Waste Report and Shipment Report

FORM WM

WASTE MINIMIZATION

PART II

WHO MUST COMPLETE THIS FORM? Form WM Part II must be completed only by generators that engaged in an activity during 1987 that resulted in waste minimization.

Waste minimization means:
(1) reduction in the volume and/or toxicity of hazardous waste generated as a result of source reduction; and/or,
(2) reduction in the volume and/or toxicity of hazardous waste subsequently treated, stored, or disposed as a result of on-site or off-site recycling.

☐ Mark ☒ and do not complete this form if no waste minimization results were achieved during 1987.

INSTRUCTIONS: Please read the detailed instructions beginning on page 26 of 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste minimized in 1988

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. EPA hazardous waste code Instruction Page 27	B. State hazardous waste code Page 27	C. Product or service description Page 27	D. Product or service SIC code Page 27
F005 F003 NA NA	NA NA	Plastiac Spiral Wound Tubes	2649

E. Waste form code Page 27	F. UOM Page 28	G. Density Page 28	H. Source description: Page 28	I. Source code Page 28
H51	P	0.8 - 1.0 ☐ lbs/gal ☒ sg	Spent polyester adhesive	1.0

Sec. II

A. 87 quantity generated Instruction Page 29	B. 88 quantity generated Page 29	C. Production ratio Page 29	D. Toxicity change code Page 31
78050	35100	1.1	0

E. Waste minimization: recycling Page 31		F. Waste minimization: source reduction Page 32	
Code	Quantity recycled	Code	Quantity prevented
1. 1 2.	12150	1. 2 2. 3.	42650

Sec. III

A. Narrative description of waste minimization project or activity and results achieved Instruction Page 30

Distillation of spent polyester adhesive to recover MEK for reuse in manufacturing process. Waste is then STILL BOTTOMS. In addition we have cut back on machine wash out and began regulating spent adhesive vs adhesive made to control amount of used adhesive.

OVER —>

OMB#: 2050-0024 Expires 12-31-88

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial
CLARCOR Precision Products Group

EPA ID NO.: MDD058594920

FORM **IC**

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1987 Hazardous Waste Generation and Shipment Report

IDENTIFICATION AND CERTIFICATION

WHO MUST COMPLETE THIS FORM? Form IC must be completed by every site that received this package.

INSTRUCTIONS: Please read the detailed instructions beginning on page 8 of the 1987 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Complete Sections I through IV and Sections VI through IX immediately. Complete Section V, certification, after you have finished the full report package.

SEC. I. Site name and physical location which may differ from the mailing address. Complete items A through G.
Mark [X] for items A, B, C, D, F, and G if same as label; if different, enter corrections. If label is absent, enter information.

A. Site/company name (Same as label ☐ or →)	B. EPA ID No. (Same as label ☐ or →)
Stone Industrial CLARCOR Precision Products Gropu	MDD058594920

C. Address number and street name of physical location - if not known, enter industrial park, building name or other physical location description (Same as label ☐ or →): 51st Avenue and Cree Lane

D. City, town, village, etc. (Same as label ☐ or →)	E. County	F. State (Same as label ☐ or →)	G. Zip Code (Same as label ☐ or →)
College Park	Prince George's	MD	20740-

SEC. II. Mailing address of site.
Mark [X] for A, B, C, and D if same as label; if different, enter corrections.

A. Number and street name of mailing address (Same as label ☐ or →): 51st Avenue and Cree Lane

B. City, town, village, etc. (Same as label ☐ or →)	C. State (Same as label ☐ or →)	D. Zip Code (Same as label ☐ or →)
College Park	MD	20740-

SEC. III. Name, title, and telephone number of the person who should be contacted if questions arise regarding this report.

A. Please print: Last name, First name, M.I.	B. Title	C. Telephone
Hager, John B.	Chief Chemist	301 474-3100 Extension 205

SEC. IV. Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. SIC codes are listed beginning on page 1 of the 1987 Hazardous Waste Report Codebook.

A.	B.	C.	D.	E.	F.
2649					

SEC V. 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. Please print: Last name, First name, M.I.	Title
Hager, John B.	Chief Chemist
B. Signature: John B. Hager	Date of signature: 04 (Mo.) 28 (Day) 88 (Yr.)

EPA Form 8700 - 13A (5-80) (Rev. 11-85) Revised (12-87)

OVER →

SEC. VI. Does this site's EPA ID authorize hazardous waste generation?

- [ ] NO → SKIP TO SECTION VII.
- [X] YES → Did this site generate any hazardous waste during 1987?
  - [ ] YES → READ DETAILED INSTRUCTION ON PAGE 9 OF THE 1987 HAZARDOUS WASTE GENERATION AND SHIPMENT REPORT INSTRUCTIONS BOOKLET FOR ACUTE AND ACCUMULATION LIMITS. MARK [X] NEXT TO THE HAZARDOUS WASTE GENERATION QUANTITY CATEGORY THAT APPLIED TO THIS SITE DURING 1987.
    - [X] Category 1: More than 1000 kg (2,200 lb) in one or more months
    - [ ] Category 2: More than 100 kg (220 lb) but no more than 1000 kg (2,200 lb) in any single month
    - [ ] Category 3: No more than 100 kg (220 lb) in any single month
      - [ ] Mark [X] if this site changed from Category 1 to Category 2 or 3 due to waste minimization activity conducted during 1986 or 1987.
  - [ ] NO → CONTINUE BELOW, MARK [X] NEXT TO ALL THAT APPLY.
    - [ ] Generated, excluded or delisted wastes
    - [ ] Generated hazardous waste prior to 1987 but do not expect to generate in the future - MARK [X] FOR REASON IN ONE BOX BELOW
      - [ ] Waste was from one-time event(s) (e.g. spills, remedial actions, etc.)
      - [ ] Waste minimization activity undertaken during 1986 or 1987
      - [ ] Out of business
    - [ ] Generated hazardous waste prior to 1987 and expect to generate in the future
    - [ ] Never generated before but expect to generate in the future
    - [ ] Never generated and do not expect to generate in the future - MARK [X] FOR REASON IN ONE BOX BELOW
      - [ ] Protective notifier only
      - [ ] Misunderstood the requirements
      - [ ] Notified to secure transportation services
      - [ ] Other EXPLAIN REASON FOR GENERATOR NOTIFICATION IN COMMENTS

SEC. VII. Does this site have RCRA Interim Status or a RCRA permit to treat, store, or dispose hazardous waste?

- [X] NO → SKIP TO SECTION VIII
- [ ] YES → Did the site treat, store, or dispose (T/S/D) hazardous waste in RCRA-regulated units during 1987?
  - [ ] YES → SKIP TO SECTION VIII
  - [ ] NO → CONTINUE BELOW, MARK [X] NEXT TO ALL THAT APPLY
    - [ ] T/S/D excluded waste during 1987
    - [ ] T/S/D hazardous waste in exempt units during 1987
    - [ ] T/S/D hazardous waste prior to 1987 but did not T/S/D waste during 1987. MARK [X] IN ONE BOX BELOW
      - [ ] T/S/D will resume in the future
      - [ ] Have notified of planned closure
      - [ ] Site is in closure or post closure
    - [ ] Never T/S/D hazardous waste prior to 1987 but: MARK [X] IN ONE BOX BELOW
      - [ ] Expect to T/S/D hazardous waste in the future
      - [ ] Do not expect to T/S/D hazardous waste in the future - EXPLAIN REASON FOR INTERIM STATUS OR PERMIT IN COMMENTS

RECEIVED MAY 9 1988

SEC. VIII. Do you wish to withdraw this site's generator notification or EPA Part A permit application? N/A

Withdraw generator notification	[ ] Yes	[ ] No
Withdraw Part A permit application	[ ] Yes	[ ] No

SEC. IX. Does this site have an area not requiring a RCRA Part A or Part B permit that is used exclusively for the short term accumulation of hazardous waste?

- [X] NO
- [ ] YES → DOES THE AREA HAVE:

Containers	[ ] No	[ ] Yes	ENTER THE NUMBER OF TANKS AND THEIR TOTAL CAPACITY IN GALLONS.
Tanks	[ ] No	[ ] Yes →	[ ] Number [ ] Gallon capacity

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial

CLARCOR Precision Products Group

EPA ID NO. MDD058594920

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1987 Hazardous Waste Report and Shipment Report

FORM GS

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1987.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed Instructions beginning on page 12 of the 1987 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1987.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Waste flammable liquid from spent adhesive; mixture of polyester, Methyl Ethyl Ketone+MCl

B. EPA hazardous waste code (Page 12): F005 F002

C. State hazardous waste code (Page 13): N/A

D. SIC code (Page 13): 2649

E. Source code (Page 13): 10

F. Waste form code (Page 13): H51

G. Waste minimization results (Page 13): B

Sec. II

A. Organics (Instruction Page 14): High P; Low Q; Test D; Note

B. Water (Page 15): High; Low; Note N

C. Total Solids (Page 15): High K; Low M; Note

D. Suspended Solids (Page 15): High K; Low M; Note

E. BTU (Page 16): DK; High; Low; UOM; Note

F. Toxic Metals (Page 16): Note A

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH (Page 18): High; Low; Note C

H. Flashpoint (Page 18): High °F; Low °F; Note B

I. Cyanides (Page 19): High; Low; Test; Note C

J. Halogens (Page 20): High P; Low Q; Note

K. Radioactive (Page 20): Yes ☐; No ☐; Note N

Sec. III

A. 1986 quantity hazardous waste generated (Instruction Page 20): NA

B. 1987 quantity hazardous waste generated (Page 20): 000078050

C. UOM (Page 21): P

D. Density (Page 21): 8.3 ← NA ☒ lbs/gal ☐ sg

E. Quantity hazardous waste on site on January 1, 1987 (Page 21): 0

F. Quantity hazardous waste remaining on site on December 31, 1987 (Page 21): 0

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22): MDD058594920

B. Number of shipments (Page 22): 007

C. Transport mode (Page 22): H

D. Off-site T/S/D/R code (Page 22): M20

E. Total quantity shipped (Page 22): 000078050

Comments: Sec. 1,F May contain 5% or less halogenatedsolvent.
Sec. 111,A, Waste generation different type

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial
CLARCOR Precision Products Group

EPA ID NO. MDD058594920

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1987 Hazardous Waste Report and Shipment Report

FORM **GS**

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1987.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1987 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1987.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description, Instruction Page 12: Waste flammable solid from bag liners in drums; polyethylene bag containing residue of acrylic pressure sensitive adhesiv

B. EPA hazardous waste code, Page 12: D001

C. State hazardous waste code, Page 13: N/A

D. SIC code, Page 13: 2649

E. Source code, Page 13: 10

F. Waste form code, Page 13: N89

G. Waste minimization results, Page 13: B

Sec. II

A. Organics, Instruction Page 14: High F; Low; Test A; Note

B. Water, Page 15: High; Low; Note N

C. Total Solids, Page 15: High A; Low; Note

D. Suspended Solids, Page 15: High; Low; Note N

E. BTU, Page 16: High; Low; UOM; Note D

F. Toxic Metals, Page 16: Note A

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH, Page 18: High; Low; Note C

H. Flashpoint, Page 18: High °F; Low °F; Note B

I. Cyanides, Page 19: High; Low; Test; Note C

J. Halogens, Page 20: High; Low; Note N

K. Radioactive, Page 20: Yes ☐; No ☐; Note N

Sec. III

A. 1986 quantity hazardous waste generated, Instruction Page 20: 8700

B. 1987 quantity hazardous waste generated, Page 20: 10500

C. UOM, Page 21: P

D. Density, Page 21: 6.48 ← NA ☒ lbs/gal ☐ sg

E. Quantity hazardous waste on site on January 1, 1987, Page 21: 0

F. Quantity hazardous waste remaining on site on December 31, 1987, Page 21: 0

Sec. IV

A. EPA ID No. of facility to which waste was shipped, Instruction Page 22: ALD006224644

B. Number of shipments, Page 22: 003

C. Transport mode, Page 22: H

D. Off-site T/S/D/R code, Page 22: M79

E. Total quantity shipped, Page 22: 00004900

Comments:

Continued on supplemental page See Sec. IV Page 3 of 4

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial

CLARCOR Precision Products Group

EPA ID NO. MDD058594920

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1987 Hazardous Waste Report and Shipment Report

FORM GS

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1987.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1987 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1987.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description Instruction Page 12

B. EPA hazardous waste code Page 12

C. State hazardous waste code Page 13

D. SIC code Page 13

E. Source code Page 13

F. Waste form code Page 13

G. Waste minimization results Page 13

Sec. II

A. Organics Instruction Page 14: High; Low; Test; Note

B. Water Page 15: High; Low; Note

C. Total Solids Page 15: High; Low; Note

D. Suspended Solids Page 15: High; Low; Note

E. BTU Page 16: High; Low; UOM; Note

F. Toxic Metals Page 16: Note

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH Page 18: High; Low; Note

H. Flashpoint Page 18: High °F; Low °F; Note

I. Cyanides Page 19: High; Low; Test; Note

J. Halogens Page 20: High; Low; Note

K. Radioactive Page 20: Yes ☐; No ☐; Note

Sec. III

A. 1986 quantity hazardous waste generated Instruction Page 20

B. 1987 quantity hazardous waste generated Page 20

C. UOM Page 21

D. Density Page 21 ☐ lbs/gal ☐ sg

E. Quantity hazardous waste on site on January 1, 1987 Page 21

F. Quantity hazardous waste remaining on site on December 31, 1987 Page 21

Sec. IV

A. EPA ID No. of facility to which waste was shipped Instruction Page 22	B. Number of shipments Page 22	C. Transport mode Page 22	D. Off-site T/S/D/R code Page 22	E. Total quantity shipped Page 22
NCD980842132	004	H	M10	000005600

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial

CLARCOR Precision Products Group

EPA ID NO. MDD058594920

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1987 Hazardous Waste Report and Shipment Report

FORM GS

WASTE GENERATION AND SHIPMENT

WHO MUST COMPLETE THIS FORM? Form GS must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1987.

☐ Mark ☒ if you are not required to complete Form GS.

INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1987 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1987.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. Waste description (Instruction Page 12): Hazardous waste solid, distillation process yielding solid from spent polyester waste.

B. EPA hazardous waste code (Page 12): F005 F002

C. State hazardous waste code (Page 13):

D. SIC code (Page 13): 2649

E. Source code (Page 13):

F. Waste form code (Page 13):

G. Waste minimization results (Page 13):

Sec. II

A. Organics (Instruction Page 14): High A; Low; Test; Note

B. Water (Page 15): High; Low; Note N

C. Total Solids (Page 15): High A; Low; Note

D. Suspended Solids (Page 15): High; Low; Note N

E. BTU (Page 16): High; Low; UOM; Note D

F. Toxic Metals (Page 16) Note A

Metal	High	Low	Test
1.			
2.			
3.			
4.			
5.			
6.			

G. pH (Page 18): High; Low; Note C

H. Flashpoint (Page 18): High °F; Low °F; Note B

I. Cyanides (Page 19): High; Low; Test; Note C

J. Halogens (Page 20): High; Low; Note N

K. Radioactive (Page 20): Yes ☐; No ☐; Note N

Sec. III

A. 1986 quantity hazardous waste generated (Instruction Page 20): 35900

B. 1987 quantity hazardous waste generated (Page 20): 20000

C. UOM (Page 21): P

D. Density (Page 21): 8.3 ☒ lbs/gal ☐ sg NA

E. Quantity hazardous waste on site on January 1, 1987 (Page 21): 0

F. Quantity hazardous waste remaining on site on December 31, 1987 (Page 21): 0

Sec. IV

A. EPA ID No. of facility to which waste was shipped (Instruction Page 22): SCD044442333

B. Number of shipments (Page 22): 001

C. Transport mode (Page 22): H

D. Off-site T/S/D/R code (Page 22): M50

E. Total quantity shipped (Page 22): 2000

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial
CLARCOR Precision Products Group

EPA ID NO. MDD058594920

FORM **OI**

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1987 Hazardous Waste Generation and Shipment Report

OFF-SITE IDENTIFICATION

WHO MUST COMPLETE THIS FORM? Form OI must be completed by every site that shipped hazardous waste off site and every site that received hazardous waste from off site during 1987.

☐ Mark [X] if you are not required to complete Form OI.

INSTRUCTIONS: Please read the detailed instructions beginning on page 23 of the 1987 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Complete A through E for each off-site installation to which you shipped waste or from which you received waste during 1987.

Complete A through D for every transporter you used during the reporting year.

Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable. Make and complete additional copies of this form if you need to identify more than four off-site installations or transporters.

Site 1

A. EPA ID No. of off-site installation or transporter Instruction page 23: NCD980842132

B. Name of off-site installation or transporter Page 23: ECOFLO, INC.

C. Site type code Page 24: K

D. Site relationship code Page 24: D

E. Address of off-site installation Page 24
Street: 2750 Patterson Street
City: Greensboro State: NC Zip Code: 24707-

Site 2

A. EPA ID No. of off-site installation or transporter Instruction page 23: NJD002454544

B. Name of off-site installation or transporter Page 23: MARISOL, INC.

C. Site type code Page 24: K

D. Site relationship code Page 24: D

E. Address of off-site installation Page 24
Street: 125 Factory Lane
City: Middlesex State: NJ Zip Code: 08846-

Site 3

A. EPA ID No. of off-site installation or transporter Instruction page 23: ALD000622464

B. Name of off-site installation or transporter Page 23: CHEMICAL WASTE MANAGEMENT, INC.

C. Site type code Page 24: F

D. Site relationship code Page 24: D

E. Address of off-site installation Page 24
Street: Alabama Highway 17 at Mile Marker 163
City: Emelle State: AL Zip Code: 35459-

Site 4

A. EPA ID No. of off-site installation or transporter Instruction page 23: SCD044444233

B. Name of off-site installation or transporter Page 23: STABLEX SOUTH CAROLINA, INC. (Thermalkem)

C. Site type code Page 24: F

D. Site relationship code Page 24: D

E. Address of off-site installation Page 24
Street: Rt. 5 Vernesdale RD
City: Rock Hill State: SC Zip Code: 29731-

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial

CLARCOR Precision Products Group

EPA ID NO. MDD058594920

FORM **WM**

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1987 Hazardous Waste Report and Shipment Report

WASTE MINIMIZATION

PART I

WHO MUST COMPLETE THIS FORM? Form WM Part I, describing efforts undertaken to implement waste minimization programs, must be completed by all generators required to file an Annual/Biennial Report. This requirement was established in response to statutory provisions included in the Hazardous and Solid Waste Amendments of 1984 (HSWA).

NOTE: Generators shipping hazardous waste off site are required to certify, on Item 16 of the Uniform Hazardous Waste Manifest, that they have a program in place to reduce, to the degree determined economically practicable, the volume and toxicity of hazardous waste generated. A similar certification must also be made by generators who have obtained a RCRA treatment, storage, or disposal permit. Consistent with these certification requirements, generators must report, on Form WM Part I, the efforts undertaken to implement waste minimization programs.

INSTRUCTIONS: Please read the detailed instructions on page 25 of the 1987 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Answer questions 1 through 10. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

1. Did this site create or expand a source reduction and recycling program?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Create	☐	☐	☐	☐	☒	☐
Expand	☒	☐	☒	☐	☐	☐

2. Did this site have a written policy or statement that outlined goals, objectives and methods for source reduction and recycling of hazardous waste?

	1987	1986	Prior Years
Yes	☒	☐	☐
No	☐	☒	☒

3. What was the dollar amount of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste? ENTER ZERO (0) IF NONE.

	1987	1986	Prior Years
Capital expenditures	$ 0	$ 0	$ 0
Operating costs	$ 0	$ 0	$ 0

4. Did this site have an employee training program or provide incentives (bonuses, awards, personal recognition, etc.) to identify and implement source reduction and recycling opportunities and activities?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Training	☒	☐	☐	☒	☐	☒
Incentives	☒	☐	☐	☒	☐	☒

OVER —>

5. Did this site conduct a source reduction and/or recycling opportunity assessment or audit? Note: an opportunity assessment or audit is a procedure that identifies practices that can be implemented to reduce the generation of hazardous waste or the quantity which must subsequently be treated, stored or disposed.

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Site-Wide	[X]	[ ]	[X]	[ ]	[ ]	[X]
Process-Specific	[X]	[ ]	[X]	[ ]	[ ]	[X]

6. Did this site identify or implement new SOURCE REDUCTION opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	[X]	[ ]	[X]	[ ]	[X]	[ ]
Implement	[X]	[ ]	[X]	[ ]	[ ]	[X]

7. What factors have delayed or prevented implementation of SOURCE REDUCTION opportunities. MARK [X] NEXT TO ALL THAT APPLY.

- [ ] a. Insufficient capital to install new source reduction equipment or implement new source reduction practices.
- [ ] b. Lack of technical information on source reduction techniques, applicable to my specific production processes.
- [ ] c. Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- [ ] d. Concern that product quality may decline as a result of source reduction.
- [ ] e. Technical limitations of the production processes.
- [ ] f. Permitting burdens.
- [X] g. Other (SPECIFY) Manufacturing process limits source reduction.

8. Did this site identify or implement new RECYCLING opportunities to reduce the volume and/or toxicity of hazardous waste generated at this site or subsequently treated, stored, or disposed of on site or off site?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Identify	[X]	[ ]	[X]	[ ]	[X]	[ ]
Implement	[X]	[ ]	[X]	[ ]	[ ]	[X]

EPA ID NO. MDD015859492 0

9. What factors have delayed or prevented implementation of on-site or off-site RECYCLING opportunities. MARK ☒ NEXT TO ALL THAT APPLY.

- ☐ a. Insufficient capital to install new recycling equipment or implement new recycling practices.
- ☐ b. Lack of technical information on recycling techniques applicable to this site's specific production processes.
- ☐ c. Recycling is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- ☐ d. Concern that product quality may decline as a result of recycling.
- ☐ e. Requirements to manifest wastes inhibit shipments off site for recycling.
- ☐ f. Financial liability provisions inhibit shipments off site for recycling.
- ☐ g. Technical limitations of product processes inhibit shipments off site for recycling.
- ☐ h. Technical limitations of production processes inhibit on-site recycling.
- ☐ i. Permitting burdens inhibit recycling.
- ☐ j. Lack of permitted off-site recycling facilities.
- ☐ k. Unable to identify a market for recyclable materials.
- ☐ l. Other (SPECIFY) _____

10. Has this site requested or received technical information or financial assistance on source reduction and/or recycling practices from any of the following sources? MARK ☒ NEXT TO ALL THAT APPLY.

	1987		1986		Prior Years	
	Technical	Financial	Technical	Financial	Technical	Financial
a. Local government	☐	☐	☐	☐	☐	☐
b. State government	☐	☐	☐	☐	☐	☐
c. Federal government	☐	☐	☐	☐	☐	☐
d. Trade associations	☐	☐	☐	☐	☐	☐
e. Educational institutions	☐	☐	☐	☐	☐	☐
f. Suppliers	☐	☐	☐	☐	☐	☐
g. Other parts of your firm	☐	☐	☐	☐	☐	☐
h. Other firms/consultants	☐	☐	☐	☐	☐	☐
i. No request made	☐	☐	☐	☐	☐	☐
j. Other (conferences, literature, etc.)_____	☐	☐	☐	☐	☐	☐

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Stone Industrial
CLARCOR Precision Products Group

EPA ID NO. MDD058594920

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION

1987 Hazardous Waste Report and Shipment Report

FORM WM

WASTE MINIMIZATION

PART II

WHO MUST COMPLETE THIS FORM? Form WM Part II must be completed only by generators that engaged in an activity during 1987 that resulted in waste minimization.

Waste minimization means:
(1) reduction in the volume and/or toxicity of hazardous waste generated as a result of source reduction; and/or,
(2) reduction in the volume and/or toxicity of hazardous waste subsequently treated, stored, or disposed as a result of on-site or off-site recycling.

☐ Mark ☒ and do not complete this form if no waste minimization results were achieved during 1987.

INSTRUCTIONS: Please read the detailed instructions beginning on page 26 of the 1987 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form.

Make and complete a photocopy of this form for each hazardous waste minimized in 1987.

Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

Sec. I

A. EPA hazardous waste code Instruction Page 27	B. State hazardous waste code Page 27	C. Product or service description Page 27	D. Product or service SIC code Page 27
F005 F002		Waste flammable liquid from Polyester Adhesives	2649

E. Waste form code Page 27	F. UOM Page 28	G. Density Page 28	H. Source description: Page 28	I. Source code Page 28
H51	P	8.3 ☒ lbs/gal ☐ sg	Distillate from spent Polyester Adhesive.	10

Sec. II

A. 1986 quantity generated Instruction Page 29	B. 1987 quantity generated Page 29	C. Production ratio Page 29	D. Toxicity change code Page 31
NA	000078050	NA.	

E. Waste minimization: recycling Page 31		F. Waste minimization: source reduction Page 32	
Code 1. 5 2.	Quantity recycled 000078505	Code 1. 2 2. 3.	Quantity prevented

Sec. III

A. Narrative description of waste minimization project or activity and results achieved Instruction Page 39

1. Minimize polyester adhesive used in manufacturing.
2. Minimize clean-up.
3. Reuse of Polyester Adhesive.

OVER —>

Sec. IV.	**Instructions:** Answer questions 1 through 4. Mark ☒ next to the effects produced by the source reduction and/or recycling activity reported on this form in Sections I through III.

1. What effect did this site's source reduction and/or recycling activity have on the **quantity** of **water effluent** produced by hazardous waste generation processes during 1987? N/A

   - ☐ a. Increase in the quantity of water effluent
   - ☐ b. Decrease in the quantity of water effluent
   - ☒ c. No effect on the quantity of water effluent
   - ☐ d. Don't know

2. What effect did this site's source reduction and/or recycling activity have on the **toxicity** of **water effluent** produced by hazardous waste generation processes during 1987?

   - ☐ a. Increase in the concentration of hazardous constituents
   - ☐ b. Decrease in the concentration of hazardous constituents
   - ☒ c. No effect on the concentration of hazardous constituents
   - ☐ d. Don't know

3. What effect did this site's source reduction and/or recycling activity have on the **quantity** of **air emissions** produced by hazardous waste generation processes during 1987?

   - ☐ a. Increase in the quantity of air emissions
   - ☒ b. Decrease in the quantity of air emissions
   - ☐ c. No effect on the quantity of air emissions
   - ☐ d. Don't know

4. What effect did this site's source reduction and/or recycling activity have on the **toxicity** of the air emissions produced by hazardous waste generation processes during 1987?

   - ☐ a. Increase in the concentration of hazardous constituents
   - ☐ b. Decrease in the concentration of hazardous constituents
   - ☒ c. No effect on the concentration of hazardous constituents
   - ☐ d. Don't know

RECEIVED
MAY 2 1988
Hazardous Waste Bureau

Comments: Sec 11 - Spent polyester adhesive waste was reduced in production; however, reflection is not evident since we changed process to gain entry into fuel blending program.

Report Reference Number: R-1430
Project Number: JLC 61A
EA Laboratory Numbers: 2325 and 2326

RESULTS OF DETERMINATION OF ISOPROPYL ALCOHOL IN TWO SOIL SAMPLES COLLECTED AT STONE INDUSTRIAL 10 APRIL 1986

Prepared for

Stone Industrial Division
J.L. Clark Mfg. Co.
51st Avenue and Cree Lane
College Park, Maryland 20740

Prepared by

EA Engineering, Science, and Technology, Inc.
Hunt Valley/Loveton Center
15 Loveton Circle
Sparks, Maryland 21152

JUNE 1986

ANALYTICAL SUMMARY

On 10 April 1986 EA Engineering, Science, and Technology, Inc. (EA) personnel collected two soil samples at Stone Industrial. The samples were hand delivered to EA for analysis. Upon receipt at the laboratory the samples were inspected, compared with the Chain of Custody Record, logged, assigned laboratory accession numbers and distributed for the determination of isopropyl alcohol according to U.S. EPA Method 624. A Hewlett-Packard Model 5985B gas chromatograph/mass spectrometer (GC/MS) was used in the analysis and the operating conditions are listed in Table 1.

The results of the analysis are summarized in Table 2 which is followed by the individual GC/MS data sheets, the reconstructed ion chromatograms (RIC), the quantitation reports for the standards, blanks and samples, and the tuning verification files. The remainder of the report consists of copies of the Chain of Custody Record and the Report/Analysis Review Record which shows that all appropriate quality control criteria were met.

TABLE 1 GAS CHROMATOGRAPH/MASS SPECTROMETER OPERATING CONDITIONS - VOLATILES - GC/MS #1

INSTRUMENT	HEWLETT-PACKARD MODEL 5985B
COLUMN	6' X 2 MM I.D. 1% SP-1000 ON 60/80 MESH CARBOPACK B
INJECTION PORT TEMPERATURE	180 C
INITIAL OVEN TEMPERATURE	45 C (2 minutes)
RAMP	8 C/MIN
FINAL OVEN TEMPERATURE	220 C
SOURCE TEMPERATURE	200 C
TYPE OF IONIZATION	ELECTRON IMPACT, POSITIVE ION
ELECTRON ENERGY	70 VOLTS
SCAN TIME	2 SECONDS
SCAN RANGE	35 AMU TO 260 AMU
CARRIER GAS	HELIUM-22 ML/MIN
PURGE TIME	12 MINUTES
DESORPTION TIME	5 MINUTES
DESORPTION TEMPERATURE	200 C
TRAP SORBENTS	TENAX, SILICA GEL, CHARCOAL
DATA SYSTEM FOR QUANTITATION	FINNIGAN SUPERINCOS WITH AUTOQUAN

TABLE 2 RESULTS OF ISOPROPYL ALCOHOL DETERMINATION IN TWO SOIL SAMPLES COLLECTED AT STONE INDUSTRIAL 10 APRIL 1986

Sample	Isopropyl Alcohol (µg/kg)	EA Lab Number
S1	<200	2325
S2	<200	2326

EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.
LABORATORY RESULTS
VOLATILES -- EPA METHOD 624

Sample Identification:	Stone Industrial - S1
Laboratory Number:	2325
Date Collected:	10 April 1986
Date Analyzed:	24 April 1986

Volatile Compounds		ppb (µg/kg)
Isopropyl Alcohol	Less than	200

Spike Recovery Data
(50 ppb added to each sample prior to analysis)

D4-1,2-Dichloroethane	44.9 ppb	89.8% Recovery
D8-Toluene	46.6 ppb	93.2% Recovery
4-Bromofluorobenzene	47.4 ppb	94.8% Recovery

EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.
LABORATORY RESULTS
VOLATILES -- EPA METHOD 624

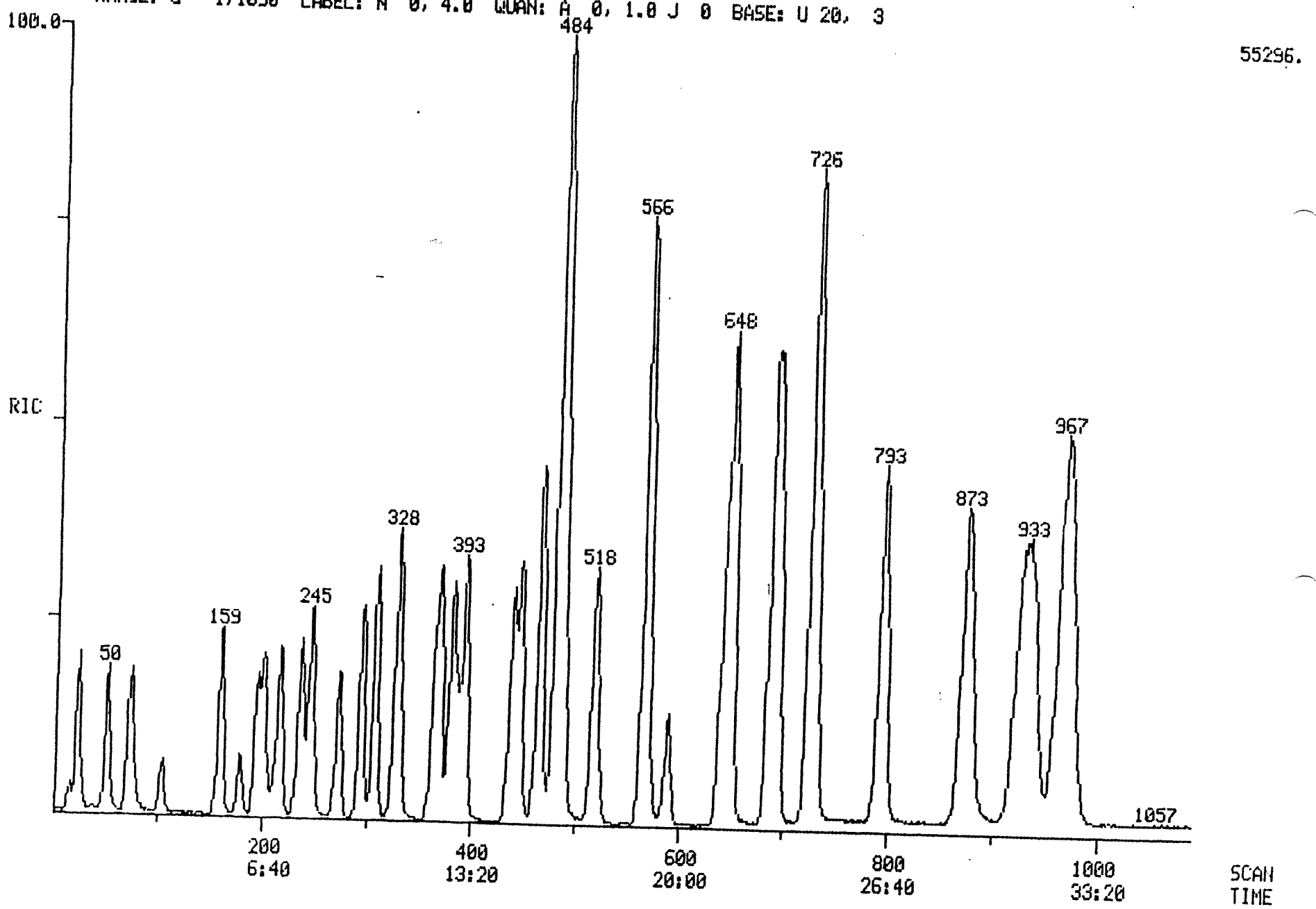
Sample Identification: Stone Industrial - S2
Laboratory Number: 2326
Date Collected: 10 April 1986
Date Analyzed: 24 April 1986

Volatile Compounds		ppb (µg/kg)
Isopropyl Alcohol	Less than	200

Spike Recovery Data
(50 ppb added to each sample prior to analysis)

D4-1,2-Dichloroethane	44.3 ppb	88.6% Recovery
D8-Toluene	46.2 ppb	92.4% Recovery
4-Bromofluorobenzene	48.5 ppb	97.0% Recovery

RIC
04/25/85 0:00:00 DATA: HP24271 #1 SCANS 1 TO 1090
SAMPLE: VOA STD 50 PPB HSL + ETHERS + ACRO./ACRYL. + 500 PPB IPA 4
CONDS.: GC/MS#1
RANGE: G 1,1090 LABEL: N 0, 4.0 QUAN: A 0, 1.0 J 0 BASE: U 20, 3



Quantitation Report File HP24271

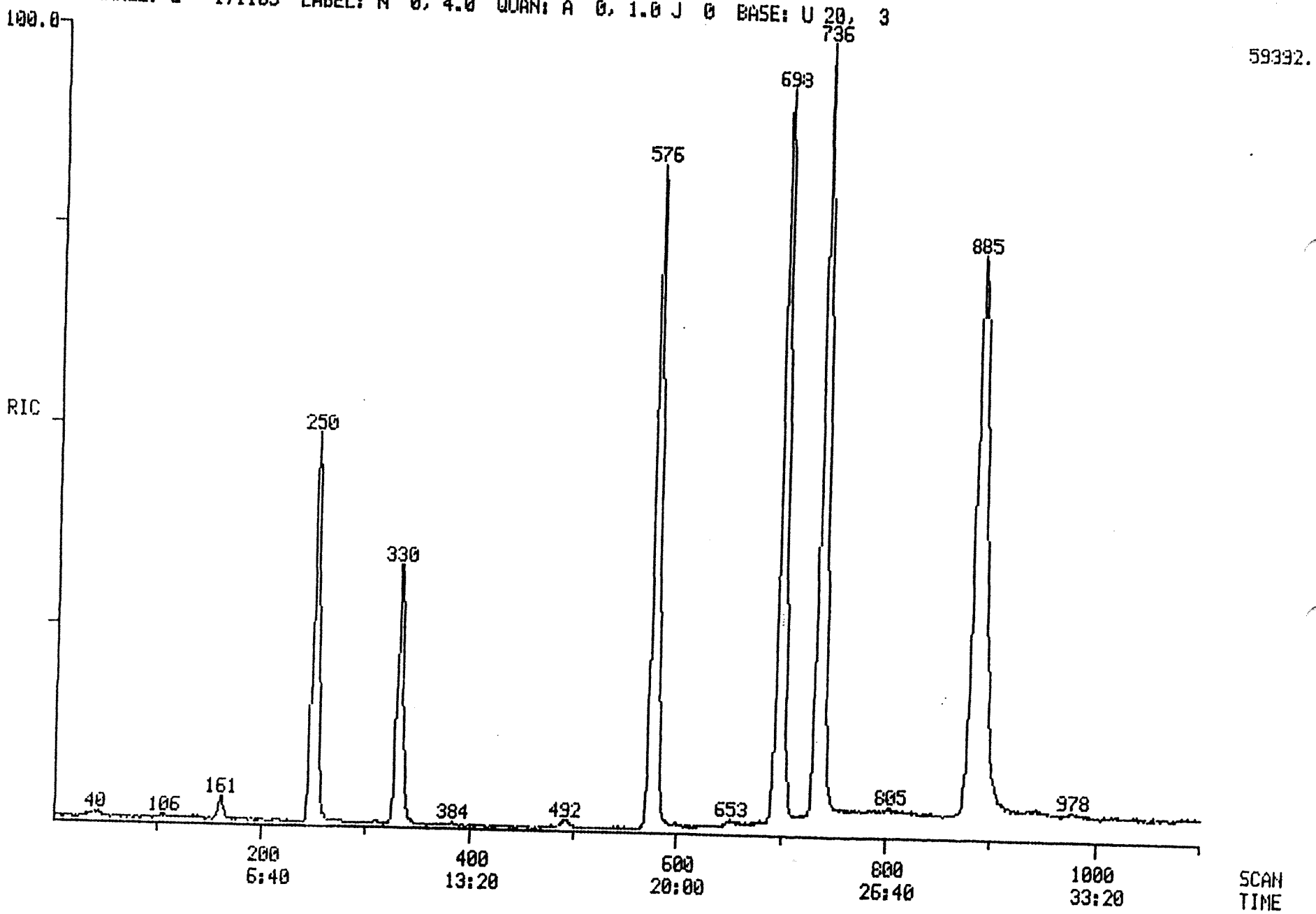
Data: HP24271.MI
04/25/86 0:00:00
Sample: VOA STD 50 PPB HSL + ETHERS + ACRO./ACRYL. + 500 PPB IPA 4
Conds.: GC/MS#1
Standard ID: HP23960 Instrument: MS2
Sensitivity ID: HP23953 Analyst: GC/MS#1 Inst Cali:

AMOUNT=AREA * REF AMNT/(REF AREA * RESP FACT)
Resp. fac. from Library Entry

NO	NAME
1	IS1 BROMOCHLOROMETHANE
2	IS2 1,4-DIFLUOROBENZENE
3	IS3 CHLOROBENZENE-D5
4	SS1 1,2-DICHLOROETHANE-D4
5	SS2 TOLUENE-D8
6	SS3 BROMOFLUOROBENZENE
7	ISOPROPYL ALCOHOL

No	m/z	Scan	Time	Ref	RRT	Meth	Area(Hght)	Amount	%Tot
1	128	245	8:10	1	1.000	A BB	19542.	50.000 PPB	6.25
2	114	566	18:52	2	1.000	A BB	77676.	50.000 PPB	6.25
3	117	724	24:08	3	1.000	A BB	79963.	50.000 PPB	6.25
4	65	326	10:52	1	1.331	A BB	23428.	50.000 PPB	6.25
5	98	687	22:54	3	0.949	A BB	79427.	50.000 PPB	6.25
6	95	873	29:06	3	1.206	A BB	52551.	50.000 PPB	6.25
7	45	211	7:02	1	0.861	A BB	5305.	500.000 PPB	62.50

RIC
04/25/86 0:00:00 DATA: HP24272 #1 SCANS 1 TO 1100
SAMPLE: VOA BLANK 4/24/86 BTG
CONDS.: GC/MS#1
RANGE: G 1,1103 LABEL: N 0, 4.0 QUAN: A 0, 1.0 J 0 BASE: U 20, 3



Quantitation Report File: HP24272

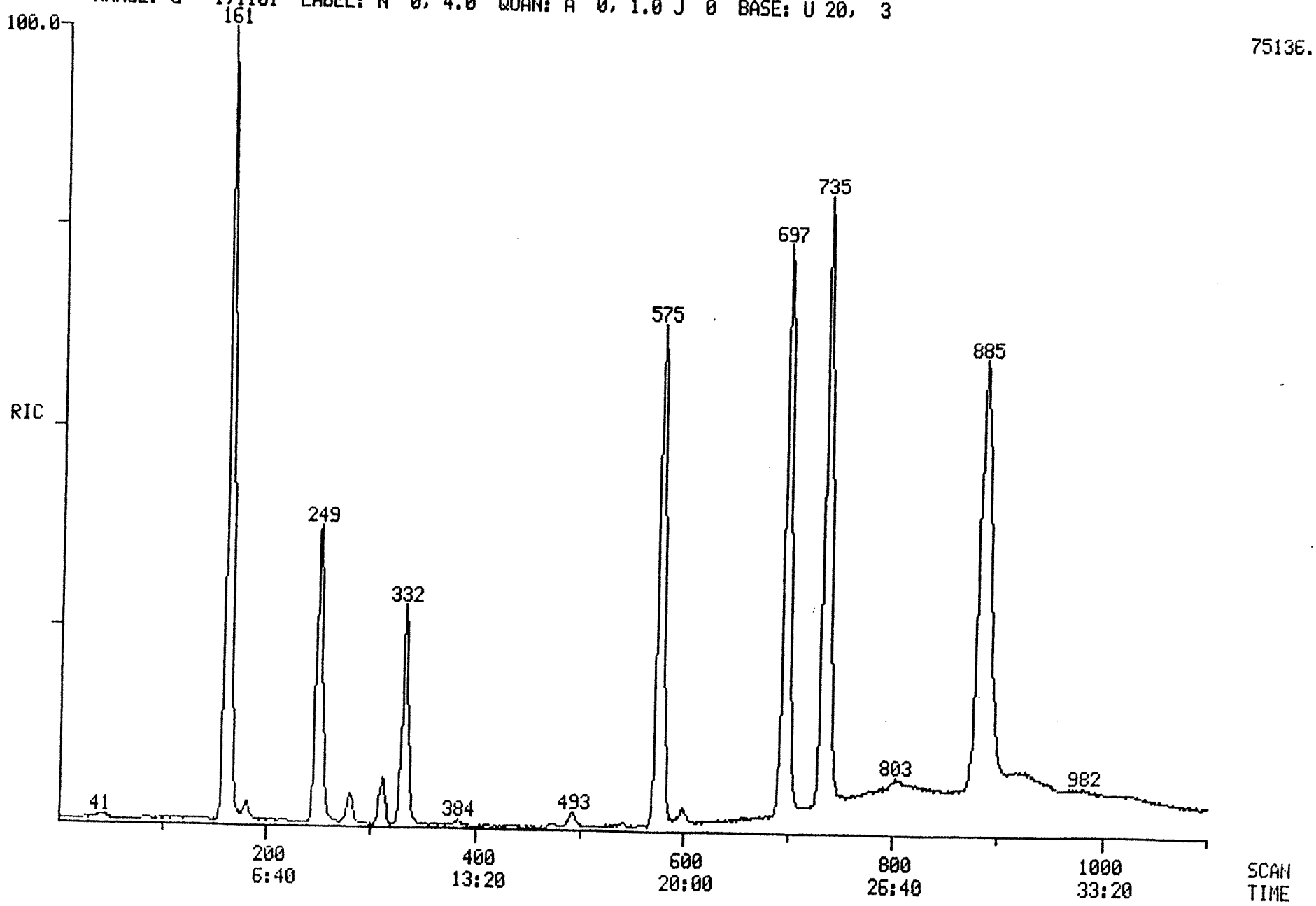
Data: HP24272.MI
04/25/86 0:00:00
Sample: VOA BLANK 4/24/86 BTG
Conds.: GC/MS#1
Submitted by: HP23953 Analyst: GC/MS#1

AMOUNT=AREA * REF AMNT/(REF AREA * RESP FACT)
Resp. fac. from Library Entry

No	Name
1	IS1 BROMOCHLOROMETHANE
2	IS2 1,4-DIFLUOROBENZENE
3	IS3 CHLOROBENZENE-D5
4	SS1 1,2-DICHLORDETHANE-D4
5	SS2 TOLUENE-D8
6	SS3 BROMOFLUOROBENZENE
7	ISOPROPYL ALCAHOL

No	m/z	Scan	Time	Ref	RRT	Meth	Area(Hght)	Amount	%Tot
1	128	250	8:20	1	1.000	A BB	37242.	50.000 PPB	8.13
2	114	576	19:12	2	1.000	A BB	168506.	50.000 PPB	8.13
3	117	736	24:32	3	1.000	A BB	158922.	50.000 PPB	8.13
4	65	330	11:00	1	1.320	A BB	41941.	45.571 PPB	7.41
5	98	698	23:16	3	0.948	A BB	154221.	48.825 PPB	7.94
6	95	885	29:30	3	1.202	A BB	95644.	46.081 PPB	7.49
7	43	215	7:10	1	0.860	A BV	203.	0.204 PPB	0.03

RIC
04/25/86 0:00:00
DATA: HP24280 #23 SCANS 1 TO 1100
SAMPLE: STONE #2325 S1 9.61G/40ML 4/24/86 BTG
CONDS.: GC/MS#1
RANGE: G 1,1101 LABEL: N 0, 4.0 QUAN: A 0, 1.0 J 0 BASE: U 20, 3



Quantitation Report File: HP24280

Data: HP24280.MI
04/25/86 0:00:00
Sample: STONE #2325 S1 9.61G/40ML 4/24/86 BTG
Conds.: GC/MS#1
Standard ID: HP23960 Instrument: MS2
Sensitivity ID: HP23953 Analyst: GC/MS#1 Inst Cali:

AMOUNT=AREA * REF AMNT/(REF AREA * RESP FACT)
Resp. fac. from Library Entry

NO	NAME
1	IS1 BROMOCHLOROMETHANE
2	IS2 1,4-DIFLUOROBENZENE
3	IS3 CHLOROBENZENE-D5
4	SS1 1,2-DICHLOROETHANE-D4
5	SS2 TOLUENE-D8
6	SS3 BROMOFLUOROBENZENE
7	ISOPROPYL ALCOHOL

No	m/z	Scan	Time	Ref	RRT	Meth	Area(Hght)	Amount	%Tot
1	128	249	8:18	1	1.000	A BB	40205.	50.000 PPB	15.46
2	114	575	19:10	2	1.000	A BB	169188.	50.000 PPB	15.46
3	117	735	24:30	3	1.000	A BB	165821.	50.000 PPB	15.46
4	65	332	11:04	1	1.333	A BB	43256.	44.872 PPB	13.87
5	98	697	23:14	3	0.948	A BB	153460.	46.585 PPB	14.40
6	95	885	29:30	3	1.204	A BB	103235.	47.366 PPB	14.64
7	45	215	7:10	1	0.863	A BV	757.	34.662 PPB	10.72

Quantitation Report File HP24280

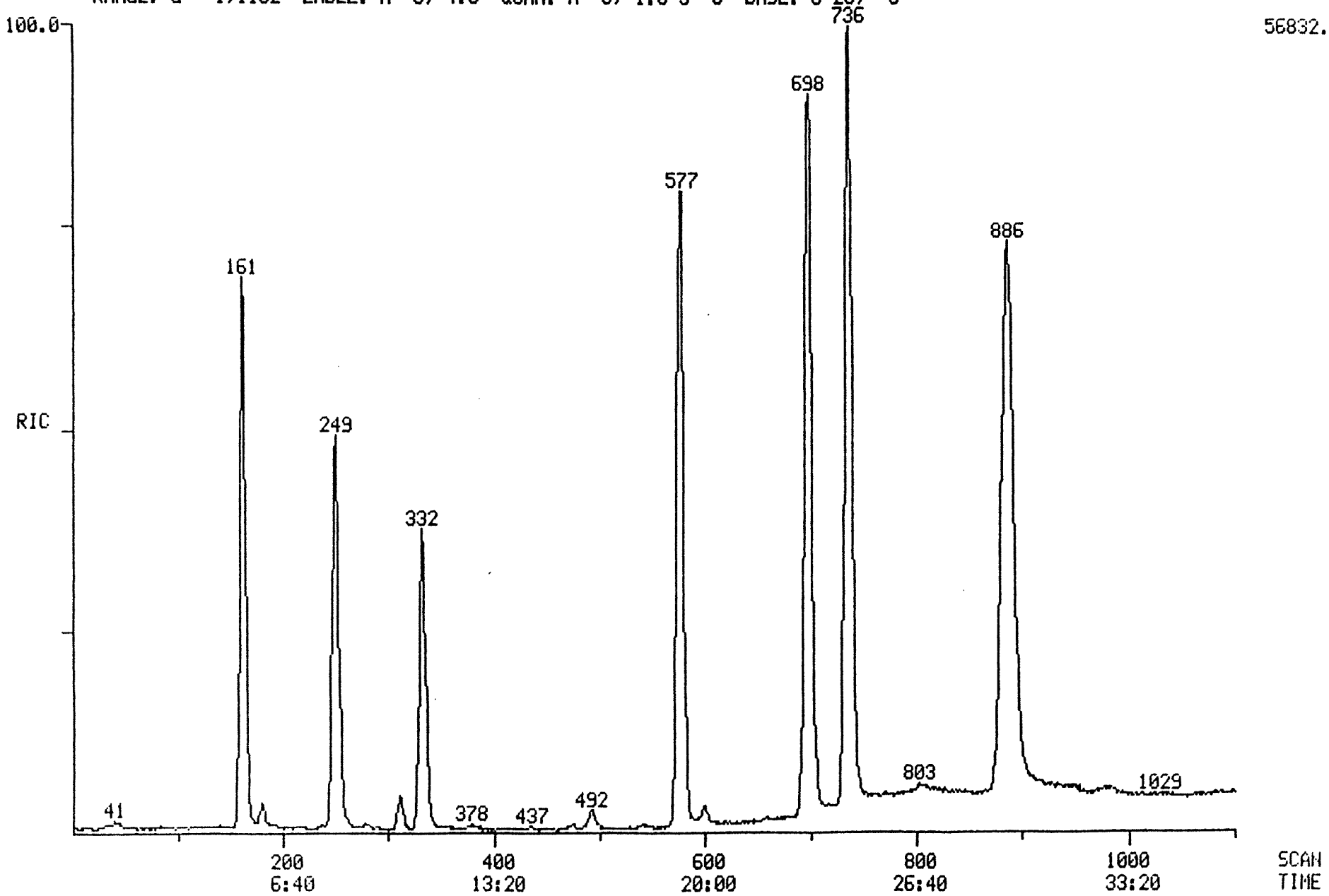
Data: HP24280.MI
04/25/86 0:00:00
Sample: STONE #2325 S1 9.61G/40ML 4/24/86 BTG
Conds.: GC/MS#1
Standard ID: HP23960 Instrument: MS2
Sensitivity ID: HP23953 Analyst: GC/MS#1 Inst Cali:

AMOUNT=AREA * REF AMNT/(REF AREA * RESP FACT) * 4.160
Resp. fac. from Library Entry

NO	NAME	
1	IS1	BROMOCHLOROMETHANE
2	IS2	1,4-DIFLUOROBENZENE
3	IS3	CHLOROBENZENE-D5
4	SS1	1,2-DICHLOROETHANE-D4
5	SS2	TOLUENE-D8
6	SS3	BROMOFLUOROBENZENE
7		ISOPROPYL ALCOHOL

No	m/z	Scan	Time	Ref	RRT	Meth	Area(Hght)	Amount	%Tot
1	128	249	8:18	1	1.000	A BB	40205.	208.000 PPB	15.46
2	114	575	19:10	2	1.000	A BB	169188.	208.000 PPB	15.46
3	117	735	24:30	3	1.000	A BB	165821.	208.000 PPB	15.46
4	65	332	11:04	1	1.333	A BB	43256.	186.668 PPB	13.87
5	98	697	23:14	3	0.948	A BB	153460.	193.795 PPB	14.40
6	95	885	29:30	3	1.204	A BB	103235.	197.041 PPB	14.64
7	45	215	7:10	1	0.863	A BV	757.	144.193 PPB	10.72

RIC DATA: HP24281 #23 SCANS 1 TO 1100
04/25/86 0:00:00
SAMPLE: STONE #2326 S2 8.70G/40ML 4/24/86 BTG
CONDS.: GC/MS#1
RANGE: G 1,1102 LABEL: N 0, 4.0 QUAN: A 0, 1.0 J 0 BASE: U 20, 3



Quantitation Report File: HP24281

Data: HP24281.MI
04/25/86 0:00:00
Sample: STONE #2326 S2 8.70G/40ML 4/24/86 BTG
Conds.: GC/MS#1
Standard ID: HP23960 Instrument: MS2
Sensitivity ID: HP23953 Analyst: GC/MS#1 Inst Cali:

AMOUNT=AREA * REF AMNT/(REF AREA * RESP FACT)
Resp. fac. from Library Entry

NO	NAME	
1	IS1	BROMOCHLOROMETHANE
2	IS2	1,4-DIFLUOROBENZENE
3	IS3	CHLOROBENZENE-D5
4	SS1	1,2-DICHLOROETHANE-D4
5	SS2	TOLUENE-D8
6	SS3	BROMOFLUOROBENZENE
7		ISOPROPYL ALCOHOL

No	m/z	Scan	Time	Ref	RRT	Meth	Area(Hght)	Amount	%Tot
1	128	249	8:18	1	1.000	A BV	39195.	50.000 PPB	15.88
2	114	577	19:14	2	1.000	A BB	164463.	50.000 PPB	15.88
3	117	736	24:32	3	1.000	A BB	160158.	50.000 PPB	15.88
4	65	332	11:04	1	1.333	A BV	41618.	44.285 PPB	14.07
5	98	698	23:16	3	0.948	A BB	147032.	46.212 PPB	14.68
6	95	886	29:32	3	1.204	A BB	102138.	48.520 PPB	15.41
7	45	213	7:06	1	0.855	A BB	548.	25.752 PPB	8.18

Quantitation Report File: HP24281

Data: HP24281.MI
04/25/86 0:00:00
Sample: STONE #2326 S2 8.70G/40ML 4/24/86 BTG
Conds.: GC/MS#1
Standard ID: HP23960 Instrument: MS2
Sensitivity ID: HP23953 Analyst: GC/MS#1 Inst Cali:

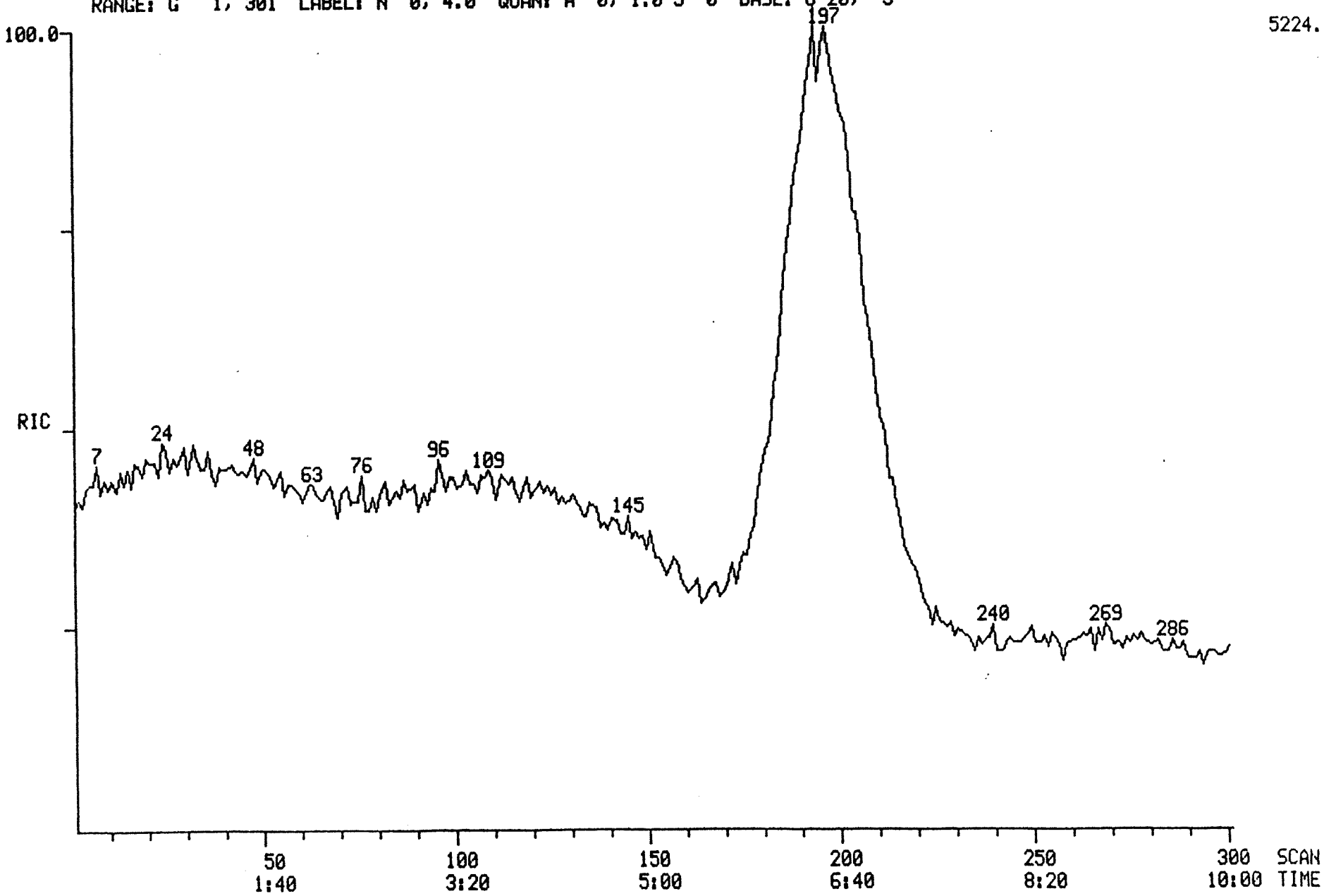
AMOUNT=AREA * REF AMNT/(REF AREA * RESP FACT) * 4.600
Resp. fac. from Library Entry

NO	NAME
1	IS1 BROMOCHLOROMETHANE
2	IS2 1,4-DIFLUOROBENZENE
3	IS3 CHLOROBENZENE-D5
4	SS1 1,2-DICHLOROETHANE-D4
5	SS2 TOLUENE-D8
6	SS3 BROMOFLUOROBENZENE
7	ISOPROPYL ALCOHOL

No	m/z	Scan	Time	Ref	RRT	Meth	Area(Hght)	Amount	%Tot
1	128	249	8:18	1	1.000	A BV	39195.	230.000 PPB	15.88
2	114	577	19:14	2	1.000	A BB	164463.	230.000 PPB	15.88
3	117	736	24:32	3	1.000	A BB	160158.	230.000 PPB	15.88
4	65	332	11:04	1	1.333	A BV	41618.	203.709 PPB	14.07
5	98	698	23:16	3	0.948	A BB	147032.	212.576 PPB	14.68
6	95	886	29:32	3	1.204	A BB	102138.	223.191 PPB	15.41
7	45	213	7:06	1	0.855	A BB	548.	118.460 PPB	8.18

RIC
04/25/86 0:00:00
SAMPLE: 50 NG BFB 4-24-86 BTG
CONDS.: GC/MS#1
RANGE: G 1, 301 LABEL: N 0, 4.0 QUAN: A 0, 1.0 J 0 BASE: U 20, 3

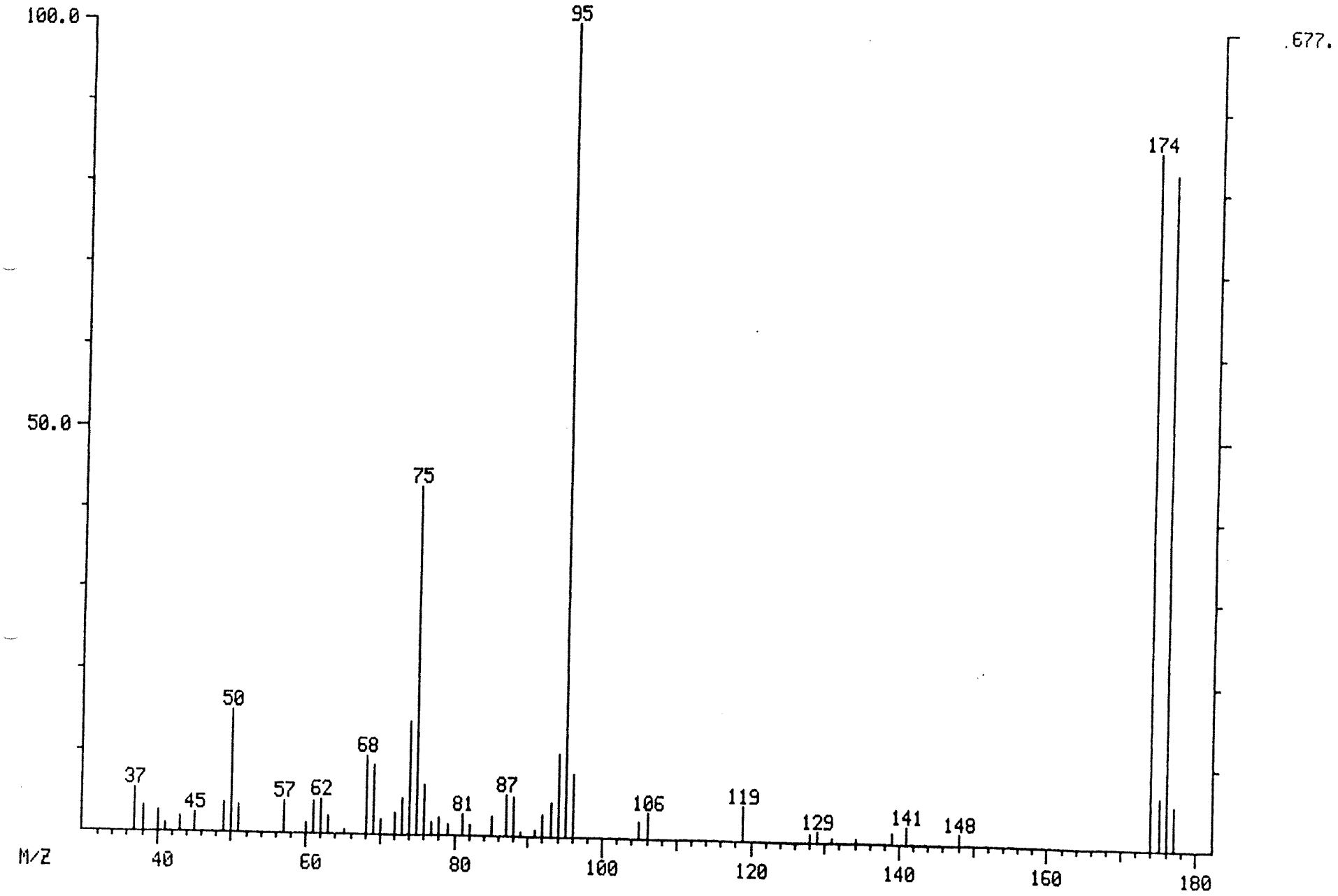
DATA: HP24270 #190 SCANS 1 TO 301



MASS SPECTRUM
04/25/86 0:00:00 + 6:20
SAMPLE: 50 NG BFB 4-24-86 BTG
CONDS.: GC/MS#1
#190 - #257 - #257 X1.00

DATA: HP24270 #190

BASE M/Z: 95
RIC: 3348.



lass List
)4/25/86 0:00:00 + 6:20
Sample: 50 NG BFB 4-24-86 BTG
Conds.: GC/MS#1
#190 - #257 X1.00

Data: HP24270 # 190

Base m/z: 95
RIC: 3348.

37 0.00 0.00 0. Minima Min Inten: 0.
177 # 0 Maxima

Mass		% RA	% RIC	Inten.
37.00		5.32	1.08	36.
38.00		3.25	0.66	22.
40.00	S	2.66	0.54	18.
41.00	S	1.03	0.21	7.
43.00	S	1.92	0.39	13.
45.00	S	2.51	0.51	17.
49.00		3.84	0.78	26.
50.00		15.07	3.05	102.
51.00	S	3.40	0.69	23.
57.00	S	3.99	0.81	27.
60.00		1.48	0.30	10.
61.00		4.14	0.84	28.
62.00		4.43	0.90	30.
63.00	S	2.22	0.45	15.
65.00	S	0.44	0.09	3.
68.00		9.75	1.97	66.
69.00	S	8.57	1.73	58.
70.00		1.92	0.39	13.
72.00		2.66	0.54	18.
73.00	S	4.58	0.93	31.
74.00		13.88	2.81	94.
75.00	S	42.98	8.69	291.
76.00		6.06	1.22	41.
77.00	S	1.62	0.33	11.
78.00		2.22	0.45	15.
79.00	S	1.48	0.30	10.
81.00		2.81	0.57	19.
82.00		1.48	0.30	10.
85.00		2.36	0.48	16.
87.00	S	5.02	1.02	34.
88.00	S	4.73	0.96	32.
89.00	S	0.59	0.12	4.
91.00	S	0.74	0.15	5.
92.00		2.81	0.57	19.
93.00		4.43	0.90	30.
94.00		10.19	2.06	69.
95.00	S	100.00	20.22	677.
96.00		7.83	1.58	53.
105.00	S	2.07	0.42	14.
106.00		3.10	0.63	21.
119.00	S	4.28	0.87	29.
128.00	S	1.18	0.24	8.
129.00		1.48	0.30	10.
131.00	S	0.59	0.12	4.
134.00	S	0.44	0.09	3.
139.00		1.48	0.30	10.
141.00		2.07	0.42	14.
148.00		1.48	0.30	10.
174.00	S	85.23	17.23	577.
175.00		6.35	1.28	43.

Mass		% RA	% RIC	Inten.
176.00	S	82.57	16.70	559.
177.00		5.32	1.08	36.

Page _____ of _____

CHAIN OF CUSTODY RECORD

(Complete One for Each Matrix and Analytical Suite)

Project Number: JLC 61A Matrix: SOIL Sampler(s) Signature: E. McFarland, P. Capers

Sample Designation	DATE (DDMMYY)	Time	Sample Container Type and Number A	B	C	F	G	H	I	J	V	P	Soil	Other	TOTAL	Grab	Comp.	Laboratory Accession Number
S#1	4/10/86	1135											X		1			2325
S#2	"	1200											X		1			2326

Special Instructions: _____

Relinquished by: (Signature) Paul Capers	Received by: (Signature)	Date/Time
Relinquished by: (Signature)	Received by: (Signature)	Date/Time
Relinquished by: (Signature)	Received by: (Signature)	Date/Time
Received for Laboratory by: (Signature)	Custody Seal Intact? ☐ Yes ☐ No ☐ N.A. Sample Shipment Complete? ☐ Yes ☐ No	Date/Time
Method of Shipment:	Laboratory Storage Location:	

Comments and Problem Resolution: _____

USE WATER-PROOF NON-BLUE PEN

EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC.

REPORT/ANALYSIS REVIEW RECORD

LEVEL NO. 2

CLIENT Stone Industrial

DATE SUBMITTED 10 APR 86

PROJECT NUMBER JLC 61 A

DATE DUE TO CLIENT 30 APR 86

CLIENT Ian MacFarlane / Paul Caprio

TYPE REPORT full

or

PROGRAM Chemistry (R-1430)

TYPE ANALYSIS Isopropyl alcohol

AUTHOR M. Uhlfelder for M. Khare

REPORT/ANALYSIS CHECKLIST

QA/QC ITEM	REVIEWER	DATE
1. Samples collected, transported, and received according to study plan requirements.	N/A	
2. Samples prepared and processed according to study plan requirements.	N/A	
3. Samples and data collected and analyzed using calibrated equipment.	MM Robinson	5 Jun 86
4. Quality control activities completed.	MM Robinson	5 Jun 86
5. Data checked for correctness, source identification, and data confirmation.	MM Robinson	5 Jun 86
6. Calculations checked: - Hand calculations checked	MM Robinson	5 Jun 86
- Documented and verified computer programs used.	MM Robinson	5 Jun 86
7. Results reviewed for compliance with study plan requirements.	N/A	
8. Reported results and facts checked against original sources.	MM Robinson	5 Jun 86
9. Figures and tables checked for correct presentation of data.	MM Robinson	5 Jun 86

	AUTHOR	DATE
10. Commentary reviewed and resolved.	Mohan Khare	6/9/86

11. All study plan and quality assurance/control requirements have been met and the report/analysis is approved:

PROGRAM/PROJECT MANAGER Mohan Khare — DATE 6/9/86

DIRECTOR — DATE

March 22, 1993

Letter regarding removal of 6 USTs

8-1134
6009994

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

March 22, 1993

90-0452
93-0560

Maryland Department of the Environment
2500 Broening Highway
Baltimore, MD 21224

Attention: Mr. Herbert M. Meade, Chief
Compliance/Remediation Div.

Dear Mr. Meade:

This letter is in reference to six underground tanks removed by Stone & Hoover in 1989. Please see the attached letters from Stone & Hoover and Gascoyne Laboratories.

We at Stone Industrial never received any confirmation from the State of Maryland verifying the removal of the tanks and closing of this project.

Would it be possible for someone in your division to review this file and in turn send us a letter closing out this project?

Sincerely yours,

STONE INDUSTRIAL
Precision Products Group, Inc.

John H. Easto

John H. Easto
Chief Engineer

JHE:ses
Encls

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 474-3100
FAX (301) 345-2367

Stone Industrial
Paramount Tube
Timms Spring
Michigan Spring

March 11, 1994

Letter regarding malfunction of Regenerative Thermal Oxidizer

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

March 11, 1994

RECEIVED
MAR 21 1994
AIR & RADIATION MANAGEMENT ADMINISTRATION

Maryland Department of the Environment
Air & Radiation Management
2500 Broening Highway
Baltimore MD 21224

Attention: Mr. Ross Oliver

Dear Ross:

This letter is in reference to the malfunction of the Regenerative Thermal Oxidizer. This report follows the outline of COMAR 26.11.01.07.D.(2).

(a) Installation - Reeco Regenerative Thermal Oxidizer, Model WC-10, Serial #1162

(b) Nature of the emission - Volatile Organic Compound (VOC)

(c) Time of occurrence and duration: Thursday, March 3, 1994; 9:00 p.m. - March 4, 1994, 2:00 a.m.

(d) Excess emissions during the occurrence and calculations

Formulation G97MR

Density of formulation 7.59 lbs/gal
V.O.C. - 5.20 lbs/gal
Total adhesive and solvent mix from 4 winders is 94.4 lbs and 48.5 lbs
Total gal. used 12.70
12.70 gal x 5.20 lbs/gal = 66.04 lbs V.O.C.

$$\begin{array}{r} 66.04 \\ \underline{48.50} \\ 114.50 \end{array}$$ lbs V.O.C. for 10 hour period

$$\frac{114.50}{10} = 11.45 \text{ lbs/hr}$$

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 474-3100
FAX (301) 345-2367

Stone Industrial
Paramount Tube
Timms Spring
Michigan Spring

11.45 x 3 hr = 34.35 V.O.C.
11.45 x 4 hr = 45.80 V.O.C.

Estimated quantity of emissions is
34.35 lbs V.O.C. - 45.80 lbs V.O.C.

At 2.9 lbs/gal V.O.C. our emission for this time frame would be
11.04 lbs V.O.C. - 14.72 lbs V.O.C.

An "Operator's Record" is maintained for each winder indicating actual material usage. Please see attached.

(e) Actual or probably cause of occurrence:

Faulty Telmar Ramp Generator, Model SP-2040. Waltor Synaliski at Reeco was contacted. Don Wittlinger, our Chief plant Electrician checked the ma signal to the Taylor instrument. This, according to Walter should have been 16.0 ma. Terminal 5 was 15.9 ma but terminal 7 read 20.20 ma.

(f) Method of correcting the cause:

Upon being discovered, the R.T.O. was placed on manual operation maintaining a constant operating temperature of 1400°F. The Telmar replacement unit is expected to be sent in 2 weeks.

(g) No other excess emissions

(h) Copy of maintenance plan attached (R-1019)

(i) Documentation that the plan is being carried out - see attached

(j) Steps taken or planned to prevent reoccurrence of excess emission:

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

Maryland Dept. of Environment
March 17, 1994

Because none of the failure lights actuated nor did the internal alarm, we will do the following: We will install indicator lights at the Plastic Winding supervisors desk. These lights will indicate the position of the roof top air stream valve. The red light will indicate "Vent to Atmosphere" & the green light will indicate "Vent to Retherm". These signals will give us an inplant continuous indication of the exhaust stream flow path. Electrical components are on order for this installation and this should be completed by the end of March.

Additional information pertaining to this report which we consider confidential is maintained in a support file.

Sincerely yours,

STONE INDUSTRIAL
Precision Products Group, Inc.

John H. Easto
Chief Engineer

JHE:ses
Encls

OPERATORS RECORD

OPERATOR WINDER NO._____

DAY_____

NIGHT_____

DATE	SHIFT	GLUE TYPE	GLUE START lbs	GLUE ADD lbs	GLUE END lbs	GLUE USED lbs	VISCOMETER JUG MEK START lbs	VISCOMETER JUG MEK ADD lbs	VISCOMETER JUG MEK END lbs	WASH MEK FRESH lbs	TOTAL MEK USED lbs
	D										
	N										
	D										
	N										
	D										
	N										
	D										
	N										
	D										
	N										
	D										
	N										

Joe Home Phone (703) 425-6702

REECO

STANDARD

Rev. 1 05/01/93

R-1019

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT
12/28/93		DW	CLEAN ALL EXCESS DUST FROM VFD
12/28/93		DW	RETIGHTENED VFD 460 TERMINALS
12/28/93		GG DW	TIGHTENED BELTS ON ROOF TOP
			FAN & ROOF TOP FAN MOTOR
			FAN RE GREASED ACTUATORS
			ACTUATOR ON 563 OVEN GREASE FITTING
			BLOCKED BY MOUNTING BRACKET
12/28/93			REPLACED HYDRAULIC RESERVOIR
			HEATER NEW HEATER 1KW
12/28/93		GG	REBUILT #1 EXHAUST #2 INLET
			VALVE HYDRAULIC CYLINDERS
12/29/93		GG	REBUILT #1 INLET VALVE
			CYLINDER
12/29/93		DW	REPLACED ALL HYDRAULIC FLUID &
			CLEANED INTERNAL MESH FILTER
12/29/93		RE	INSTALLED 2 HYDRAULIC BLEEDER
			VALVES AT #1 INLET & 1 EXHAUST
			VALVES TO PROVIDE FOR WARMER
			HYDRAULIC FOR ALL CYLINDERS
12/30/93		DW	CHECKED STARTER CONTACTS CLEANED
			COMBUSTION BLOWER FILTER
			REPLACED GASKET REAR EXHAUST
			HATCH
12/30/93		GG	GREASED MAIN BLOWER & LOWER
			LEVEL ACTUATORS
12/30/93		NB	INSTALLED FILTER HOLDERS
			VFD

REECO

STANDARD

R-1019

Rev. 1 05/01/93

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT
12/24/93		RE	REPLACED HYDRAULIC FILTER

R-1019

Regenerative Environmental
Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT

April 7, 1994

Site Complaint

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(410) 631-3386

SITE COMPLAINT

NUMBER	DATE
SC-O-94-102	4/7/94

1. Name of violator: STONE INDUSTRIAL
   Address: 9207 51st AVENUE, COLLEGE PARK 20740-1912
   County: P.G. Phone: 301 474 3120

2. Violation Type (with reference to the **Annotated Code of Maryland**)
   - ☐ Water Pollution Control and Abatement (Environment Article, Sections 9-301 through 9-344)
   - ☐ Oil Control (Environment Article, Sections 4-401 through 4-418)
   - ☒ Controlled Hazardous Substances (Environment Article, Sections 7-201 through 7-268)
   - ☐ Landfills and Sludge Disposal (Environment Article, Section 9-204)
   - ☐ Other

3. Specifically: STORAGE OF CHS STILL GAUGE BY BOX 32 & LS15 STILL IN VIOLATION OF COMAR 26.13.05.09 // CHS STILL BY LS15 NOT COVERED, VIOLATION OF COMAR 26.13.05.09 // VIOLATION OF COMAR 26.13.05.10 C(2), D, 10-4 B(1) AT 1000 GAL. WASTEWATER TANK // VIOLATION OF COMAR 26.13.05.10 C(1), D, 10-4, 10-3, 10-4 B, 10-4 G AT 3000 GAL. WASTEWATER TANK.

4. You are hereby advised the following corrective actions are necessary. Compliance with the corrective actions contained herein does not preclude the Department from imposing further requirements. In addition, the Department reserves the right to impose sanctions or penalties for the underlying violation(s).

   ADHERE CORRECTIVE MEASURES DISCUSSED IN ATTACHED REPORT OF VIOLATIONS.

5. The above described violation(s) may result in the Department seeking legal sanctions against you, including the imposition of civil and/or criminal penalties. Continuation of the violation(s) or failure to take the corrective actions described above may result in additional sanctions or penalties.

6. "I hereby acknowledge receipt of this Site Complaint by my signature, which is not an admission of guilt".

Person issued to: [illegible] Title: CHIEF ENGINEER

Authorized by: Robert Perciasepe
Secretary
Department of the Environment

Issued by: [illegible]
Inspector

Phone: 410 631 3470

MDE 113
REV. 1/11/88

PRINTED ON RECYCLED STOCK

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(410) 631-3400

FI_____ Inspector: J. L. [illegible] Date: 03/31/94

GENERATOR CHECKLIST

Facility Name: STONE INDUSTRIAL

Address: 9207 51st AVENUE, COLLEGE PARK, MD 20740-1910

Facility Representative: JOHN EASTO Telephone No.: 301 474 5100

Description of Work Activity: MANUFACTURE TUBING

EPA Identification Number? M-D-D-0-8-8-5-9-4-9-2-0

Section A - Hazardous Waste Determination

1. Does facility generate hazardous waste(s) as defined in COMAR 26.13.02.10 - .19?.....✓Yes___No
   If yes, under which catagory is the waste?

   ✓Ignitable ✓Corrosive ___Reactive ___EP Toxic ✓RCRA Listed

2. Describe the amount of waste generated (day, week or month).

   ~2000 #/MONTH - STILL BOTTOMS

Section B - Manifest (26.13.03.04)

1. Does generator ship waste off-site?.....✓Yes___No
   (If no, do not complete sections B and C)
2. Does generator use manifest?.....✓Yes___No
   If no, explain:_____
3. Does generator retain copies of manifests?.....✓Yes___No___N/A
   If yes, does the manifest include the following information? (26.13.03.04C)
   - -Manifest document number?.....✓Yes___No___N/A
   - -Generator's name, mailing address and telephone number?.....✓Yes___No___N/A
   - -Generator's EPA I.D. number?.....✓Yes___No___N/A
   - -Transporter name(s) and EPA I.D. number(s)?.....✓Yes___No___N/A
   - -Designated TSDF name, address, and EPA I.D. number?.....✓Yes___No___N/A
   - -Alternate TSDF name, address, and EPA I.D. number?.....✓Yes___No___N/A
   - -Instructions to return waste to generator if undeliverable?.....✓Yes___No___N/A
   - -Description of the waste required by DOT regulations?.....✓Yes___No___N/A

PRINTED ON RECYCLED STOCK

-Quantity of each hazardous waste by units of weight or volume?....___Yes___No___N/A
-Total number and types of containers given to transporter?.....___Yes___No___N/A
-Is the proper certification noted on each manifest?.....___Yes___No___N/A

4. Has the generator signed and dated manifests (26.13.03.04E)?.....___Yes___No___N/A
5. Did the generator obtain initial transporter's signature and date of acceptance?.....___Yes___No___N/A
6. Do returned copies of manifest include facility owner/operator signature and date of acceptance?.....___Yes___No___N/A
7. Have manifests been retained for three years?.....___Yes___No___N/A

Section C - Pre-Transport Requirements (26.13.03.05) ___N/A

1. Does generator package wastes in accordance with DOT requirements?....___Yes___No
2. Are containers in good condition?.....___Yes___No
   If no, explain:_____
3. Is the date that accumulation time began clearly marked and visible for inspection on each container?.....___Yes___No
4. Is period of accumulation less than 90 days?.....___Yes___No
   -If no, is amount accumulated less than 500 kg or less than 1 kg of acute hazardous waste?.....___Yes___No___N/A
   -If no, explain:_____
5. Is "SATELLITE ACCUMULATION" no more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste?.....___Yes___No___N/A
6. Are containers in good condition, closed, and clearly marked "HAZARDOUS WASTE"?.....___Yes___No___N/A

Section D - Recordkeeping and Reporting (26.13.03.06)

1. Does the generator keep the following reports for three years?
   -Manifests and signed copies from designated facilities?.....___Yes___No
   -Annual Reports?.....___Yes___No
   -Exception Reports?.....___Yes___No___N/A
   -Waste Analyses?.....___Yes___No___N/A

Section E - Special Conditions (26.13.03.07)

1. Has the generator received from or transported to a foreign country any hazardous waste(s)?.....___Yes___No
   -If yes, has a notice been filed with MDE and EPA?.....___Yes___No___N/A
   -Is this waste manifested and signed by a foreign consignee?.....___Yes___No___N/A
   -If generator transported wastes out of the country, has confirmation of delivery been received?.....___Yes___No___N/A

Section F - General Requirements (26.13.03.05E)

Personnel Training (26.13.05.02G)

1. Does the owner/operator maintain personnel training records?.....___Yes___No
   If yes, do they include:
   -Job title and written job description of each position?.....___Yes___No
   -Description of type and amount of training?.....___Yes___No
   -Records of training given to facility personnel?.....___Yes___No

Preparedness and Prevention (26.13.05.03)

1. Is there evidence of fire, explosion, or contamination of the environment?.....___Yes___No

2. Is the facility equipped with:
   a. Internal communication or alarm system?.....___Yes___No
   b. Telephone or two-way radio to call emergency response personnel?.....___Yes___No
   c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?.....___Yes___No
   d. Water of adequate volume for hoses, sprinklers, or water spray system?.....___Yes___No
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?.....___Yes___No
4. Has the owner/operator made arragements with the local authorities to familiarize them with characteristics of the facility?.....___Yes___No
5. In the case that more than one police or fire department might respond, is there a designated primary authority?.....___Yes___No
6. If State or local authorities decline to enter into these arrangements,, has this been documented in the operating log?.....___Yes___No___N/A

Contingency Plan and Emergency Procedures (26.13.05.04)

1. Is a contingency plan maintained at the facility?.....___Yes___No
   If yes, does contingency plan include:
   -Arrangements with local emergency response organizations?.....___Yes___No
   -Emergency coordinators' names, phone numbers, and addresses?.....___Yes___No
   -List of all emergency equipment at the facility and description of equipment?.....___Yes___No
   -Evacuation plan for facility personnel?.....___Yes___No
2. Is there an emergency coordinator on site or on call at all times?....___Yes___No
3. Has a copy of the Contingency plan been submitted to local or State agencies that may be asked to provide emergency services?.....___Yes___No
4. Has the plan ever been implemented?.....___Yes___No
   -If so, was the plan appropriate?.....___Yes___No___N/A
   If the plan was not appropriate, has it been amended?.....___Yes___No___N/A
   -If the plan was implemented, was the incident recorded in the operating log and was a written report submitted to MDE?.....___Yes___No___N/A

Use and Management of Containers (26.13.05.09)

1. Are containers in good condition?.....___Yes___No
2. Is container made of a material that will not react with the waste which it stores?.....___Yes___No___N/A
3. Are containers always closed when holding hazardous waste?.....___Yes___No
4. Are containers handled so that they will not be opened, handled, or stored in a manner which may rupture them or cause them to leak?...___Yes___No
5. Does owner/operator inspect containers at least weekly for leaks and deterioration?.....___Yes___No
6. Do container storage areas have adequate containment systems?.....___Yes___No
7. Are containers holding ignitable and reactive waste located at least 15m (50 ft) from facility property lines?.....___Yes___No___N/A
8. Are incompatible wastes or materials placed in the same containers?...___Yes___No___N/A
9. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?.....___Yes___No___N/A
10. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?.....___Yes___No___N/A

Annual Reports (26.13.03.06B)

1. Does the facility submit annual reports to MDE?..... ✓ Yes ___ No
   If yes, do reports contain the following information?
   a) Name, address and EPA I.D. number of facility?..... ✓ Yes ___ No
   b) Date and year covered by report?..... ✓ Yes ___ No
   c) Description/quantity of hazardous waste?..... ✓ Yes ___ No
   d) Description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?..... ✓ Yes ___ No
   e) Certification signed by owner/operator?..... ✓ Yes ___ No

Section G - Other Checklists Completed: ___ N/A

✓ Tanks
_____ Transporter
✓ Land Disposal Restrictions
_____ TSD Facility
_____ Surface Impoundment
_____ Waste Pile
_____ Land Treatment
_____ Landfill
_____ Incinerator
_____ Thermal Treatment
_____ Groundwater Monitoring

Section H - Additional Comments

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION

REPORT OF OBSERVATIONS

Type of Inspection: Compliance Evaluation Inspection (CEI)
Date: 03/31/94
Facility Name: Stone Industrial

1. I visited the site on 03/31/94 to conduct a CEI inspection of Stone Industrial, a large quantity generator. Findings are described below; Mr. John Easto of Stone accompanied me on the inspection. A copy of this inspection report was provided to Mr. Easto on 04/07/94.

2. Building 3, 380 Still Area:

a. This still, which is used to recover methyl ethyl ketone (MEK) from spent adhesive, and generates a controlled hazardous substance (CHS) sludge, is currently not being operated. A company employee was removing spilled sludge from the containment area below the still; the 380 still is placed on an elevated stand about six feet above the floor. A metal bin about 3 feet by 6 feet by 6 inches was also observed in the same area, about 10 feet from the still stand. This bin contained absorbent material and spilled sludge from the 380 still, and is normally positioned under the still.

The sludge is designated by Stone as a CHS, D001 and F003 due to residual MEK. The spillage observed adhering to the still related equipment below the still and in the metal bin was not being stored in an appropriate container, in violation of COMAR 26.13.05.09. The accumulated spilled sludge must be placed in acceptable, properly labelled and dated containers immediately.

b. Drum Storage Room: Directly adjacent to the 380 still is a room which is divided into two sections separated by a wall. One section contains raw materials used in the manufacturing processes conducted at the plant, and the other room stores drums of hazardous waste sludge and material awaiting recycling. A total of 4 metal 55 gallon drums containing MEK/adhesive mix awaiting recycling were observed, along with 11 metal 55 gal. drums of CHS, with the following contents:

i. 1 drum of waste refrigeration material.
ii. 4 drums of waste ink/isopropyl alcohol.
iii. 6 drums of waste MEK/toluene sludge.

3. Building 2:

a. In Building 2, Stone conducts tube manufacturing operations and operates the still designated LS15. Directly adjacent to the

still, a satellite accumulation drum containing CHS sludge (D001 and F003 MEK/toluene contaminated material) in plastic bags (which fit into the still) was observed. The lid of the drum was not closed, in violation of COMAR 26.13.03.05 E(3). Stone must keep the waste sludge drum closed at all times except those when waste is being added to or removed from the drum.

b. A small quantity of CHS sludge was observed adhering to the side of the still and on the floor area within one foot of the still, in violation of COMAR 26.13.05.09.; Stone must remove the sludge and store the waste in appropriate containers immediately.

c. I observed several metal funnels, about 6 inches in diameter, lying on a grate which drains to the sanitary sewer, near the 700 gal. OAKITE tank. These funnels appeared to be contaminated with MEK/adhesive; I advised Mr. Easto to remove the funnels immediately.

4. 6000 gallon Wastewater Tank:

a. Stone generates D002 wastewater when floors in the tube treatment area are washed. This wastewater drains to floor sumps, then to a 3000 gal. in ground brick tank. The wastewater is pumped as it is being accumulated from the 3000 tank via an on-ground metal pipe to the 6000 gal. tank. The 6000 metal gal. tank has 110% secondary containment and is housed in a small building attached to the northwest side of Building 2.

b. Based on discussions with Mr. Easto, Stone is not following the requirements of COMAR 26.13 listed below in regard to the 6000 gal tank:

1. COMAR 26.13.05.10 C(2) - The tank does not have overfilling controls specified in the cited regulation.
2. COMAR 26.13.05.10 D - The tank inspection requirements specified are not being fulfilled.
3. COMAR 26.13.05.10-4 B(6) - The tank does not have the required leak detection system.
4. The pipe connecting the brick tank to the 6000 gal. tank does not have secondary containment, as required by COMAR 26.13.05.10-4 F, and is not being inspected daily, as required by COMAR 26.13.05.10-04 F. Secondary containment must be in place by 07/01/95; until the required equipment changes have been made, Stone shall inspect the pipeline on a daily basis.

5. 3000 gallon Tank:

As described in (4) above, Stone transfers all D002 wastewater from the building to a 3000 gallon in ground brick sump. This tank is about 10-12 feet deep, with an approximately square cross section about 5-6 feet on a side at ground surface, and is located on the north side of Building 2, about 50 feet east of

the 6000 gal. tank. Neither the 3000 gal. tank nor the transfer line from the plant have secondary containment. As waste water is being transferred to this tank, a pump located at the bottom immediately pumps the waste to the 6000 gal. tank; the 3000 gal. tank does not accumulate waste, and was empty when observed 03/31/94.

Operation of the 3000 gal. tank in its existing condition by Stone violates the following regulations:

a. COMAR 26.13.03.05 E(1), failure to maintain required inspection logs.
b. COMAR 26.13.05.10 C(2), lack of appropriate overflow controls.
c. COMAR 26.13.05.10 D, lack of inspections of overflow controls, daily inspections, inspection of waste level in the tank, and assessment of the tank's conditions.
d. COMAR 26.13.05.10-4, lack of secondary containment. Stone must provide secondary containment meeting the requirements of COMAR 26.13.05.10-4 by 07/01/95.
e. COMAR 26.13.05.10-2, lack of a written tank assessment; this requirement must be met by 07/01/94.
f. COMAR 26.13.05.10-4 B, lack of a leak detection system and an annual leak test.
g. COMAR 26.13.05.10-4 G, lack of secondary containment for ancillary equipment; secondary containment must be provided by 07/01/95.

Stone should also review the attached tank inspection report and the applicable sections of COMAR 26.13.05.10 et. seq. to obtain a fuller description of the requirements for tanks.

I issued Site Complaint SC-0-94-102 on 04/07/94, citing Stone for violations discussed above in 2a., 3a., b., and c., 4b., and 5a. through g. Except for the specific deadlines regarding compliance with the tank regulations, Stone shall comply with all requirements specified in this report immediately.

Observer

J Lenzer

Person Interviewed

John H Easto

FI _____ Inspector: J. LEIBEAR Date: 03/31/94

TANK CHECKLIST
(Accumulation Tanks)

Generator Name:

Pretransport Requirements - Accumulation Time			
1. For tanks not covered by a hazardous waste facility permit, has the owner or operator stored hazardous waste in the tanks for no more than 90 days ? (.03.05E)	✓ Yes	___ No	___ N/A
2. Has the facility notified the agency that the tanks are being used for the storage of hazardous waste by the following deadlines: (a) For existing tanks as defined in COMAR 26.13.01.03B(22-1), by January 1, 1994; (b) For new tanks, as defined in COMAR 26.13.01.03B(55-1), before the tank is placed in service. (.03.05E(1)(j))	✓ Yes	___ No	___ N/A
3. Did the notification required in item 3 include the following information: (.03.05E(1)(i))	✓ Yes	___ No	___ N/A
(a) date of installation of the tank, or, if the date of installation is unknown, the age of the facility (.03.05E(1)(i)(i));	✓ Yes	___ No	___ N/A
(b) tank capacity (.03.05E(1)(i)(ii));	✓ Yes	___ No	___ N/A
(c) secondary containment capacity (.03.05E(1)(i)(iii));	✓ Yes	___ No	___ N/A
(d) whether the tank is an aboveground, inground, or underground tank (.03.05E(1)(i)(iv));	✓ Yes	___ No	___ N/A
(e) for underground tanks, whether the tank can be entered for inspection (.03.05E(1)(i)(v)); and	✓ Yes	___ No	___ N/A
(f) waste code of each waste managed in the tank (.03.05E(1)(i)(vi)).	✓ Yes	___ No	___ N/A
4. Is the generator maintaining an inspection log or summary which documents inspections performed in accordance with COMAR 26.13.03.05E(1)(h) ? (.03.05E(1)(k)(i))	___ Yes	✓ No	___ N/A
5. Does the inspection log include the date and time of each inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs made or other remedial actions taken ? (.03.05E(1)(k)(ii))	___ Yes	✓ No	___ N/A
6. Has the generator kept the inspection log on file for a minimum of 3 years from the date of the inspection ? (.03.05E(1)(k)(iii))	___ Yes	✓ No	___ N/A

General Requirements for hazardous waste management in tank systems (26.13.05.10)			
7. Are the facility's tank systems being managed so that placement of hazardous waste or treatment reagents in the facility's tank systems will not cause any tank, its ancillary equipment or its containment system to rupture, corrode, leak or otherwise fail. (.05.10C(1))	✓ Yes	___ No	___ N/A
8. Have appropriate controls and practices to prevent spills and overflows from tank or containment systems been used ? (.05.10C(2))	___ Yes	✓ No	___ N/A
9. Have the following controls and practices been employed to prevent spills and overflows from tank or containment systems (.05.10C(2)):			
(a) Controls to prevent overfilling, such as level sensing devices, high level alarms, automatic feed cutoff, or by-pass to a standby tank ? (.05.10C(2)(a))	___ Yes	✓ No	___ N/A
(b) For uncovered tanks, maintenance of sufficient freeboard to prevent overtopping by wave or wind action or by precipitation ? (.05.10C(2)(b))	✓ Yes	___ No	✓ N/A
(c) Spill prevention controls, such as check valves or dry disconnect couplings ? (.05.10C(2)(c))	✓ Yes	___ No	___ N/A
10. Has a schedule and procedure for inspecting overfill controls been developed and is it being followed ? (.05.10D(1))	___ Yes	✓ No	___ N/A
Are the following being inspected at least once each operating day:			
(a) Data gathered from monitoring and leak detection equipment, such as pressure and temperature gauges and monitoring wells, to ensure that the tank system is being operated according to its design ? (.05.10D(2)(a))	___ Yes	✓ No	___ N/A
(b) For uncovered tanks, the level of waste in the tank ? (.05.10D(2)(b))	___ Yes	✓ No	___ N/A
(c) Above-ground portions of the tank system to detect corrosion or releases of waste ? (.05.10D(2)(c))	___ Yes	✓ No	___ N/A
(d) The construction materials of, and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous wastes ? (.05.10D(2)(d))	___ Yes	✓ No	___ N/A
12. If cathodic protection systems are present, are they inspected according to, at a minimum, the following schedule to ensure that they are functioning properly ? (.05.10D(3))			
(a) Has proper operation of the cathodic protection system been confirmed within 6 months after initial installation and annually after that ? (.05.10D(3)(a))	___ Yes	___ No	✓ N/A
(b) Have all sources of impressed current been inspected or tested or both, as appropriate, at least every 2 months ? (.05.10D(3)(b))	___ Yes	___ No	✓ N/A

13. Has a schedule and procedure for assessing the condition of the facility's tanks been developed which meets the following requirements: (.05.10D(4))			
(a) The schedule and procedure is adequate to detect cracks, leaks, corrosion, or erosion which indicate that placing hazardous waste or treatment reagents in the tank system could cause the tank, its ancillary equipment, or the containment system to rupture, corrode, leak or otherwise fail. (.05.10D(4)(a))	___ Yes	✓ No	___ N/A
(b) The inspection procedure includes procedures for emptying each tank to allow entry and inspection of the interior when tank entry is necessary to detect corrosion or erosion of the tank sides and bottom. (.05.10D(4)(b))	___ Yes	✓ No	___ N/A
14. Are inspection requirements of items 11-13 above documented in the operating record of the facility ? (.05.10D(5))	___ Yes	✓ No	___ N/A
15. Have tanks been provided with emission controls and safety or emergency procedures to protect human health and the environment from fumes, mists or gases resulting from volatilization, chemical reactions, or physical agitation of wastes in the tanks ? (.05.10E)	___ Yes	___ No	✓ N/A
<u>Special Requirements for Hazardous Waste Management in Tank Systems (26.13.05.10-1)</u>			
For ignitable or reactive wastes managed in tank systems, has the owner or operator complied with one of the following: (.05.10-1A(1))	___ Yes	___ No	✓ N/A
(a) The waste has been treated, rendered, or mixed before or immediately after placement in the tank system so that: (i) The resulting waste, mixture, or dissolved material no longer meets the definition of ignitable or reactive waste under COMAR 26.13.02.11 or .14, and (ii) COMAR 26.13.05.02H(2) is complied with;			
(b) The waste has been stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react; or			
(c) The tank system has been used solely for emergencies ?			
17. Has the owner or operator complied with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code," (1990) ? (.05.10-1A(2))	___ Yes	___ No	✓ N/A
<u>Assessment of Existing Tank System's Integrity (26.13.05.10-2)</u>	6000 GAL 3000 GAL	YES NO	
18. Do all tank systems at the facility have secondary containment meeting the requirements of COMAR 26.13.05.10-4 ? (If YES, skip item 19)	___ Yes	___ No	___ N/A

19. For each existing tank system that does not have secondary containment meeting the requirements of COMAR 26.13.05.10-4, has the owner or operator: (.05.10-2B)			
(a) By the deadlines specified in COMAR 26.13.05.10-2B(4), developed, and kept on file at the facility, a written assessment of whether the tank system: (a) is leaking or otherwise unfit for use, and (b) will collapse, rupture or fail based on an analysis of the tank system design, structural strength, and compatibility with the waste or wastes to be stored or treated ?	___ Yes DUE	✓ No BY 07/01/94	___ N/A
(b) Had the assessment described in item 19(a) certified by an independent, qualified registered professional engineer ?	___ Yes	✓ No	___ N/A
(c) Considered, in the assessment described in item 19(a), design standards, if available, according to which the tank and ancillary equipment were constructed; hazardous characteristics of the waste or wastes that have been and will be handled; existing corrosion protection measures; documented age of the tank system, if available, or, if not, an estimate of the age; and the results of a leak test, internal inspection, or other tank integrity examination ?	___ Yes	✓ No	___ N/A
[items on design and installation of new tank systems and components will be addressed in checklist for permit writers, and special checklist for initial inspection of new tank]	___ Yes	___ No	✓ N/A
<u>ıtainment and Detection of Releases (26.13.05.10-4)</u>	6000 GAL 1993 3000 GAL DUE BY 07/01/9		
20. Has the owner or operator provided secondary containment for tanks used to manage hazardous waste by the appropriate deadlines (see summary of deadlines provided separately) ? (.05.10-4A)	✓ Yes JL	___ No	___ N/A
21. Have secondary containment systems been designed, installed and operated to prevent any migration of wastes or accumulated liquids out of the system to soil, ground water or surface water ? (.05.10-4B(1))	✓ Yes	___ No	___ N/A
22. Are secondary containment systems: (a) capable of detecting and collecting releases and accumulated liquids until the collected material is removed ? (.05.10-4B(2))	✓ Yes	___ No	___ N/A
(b) constructed or lined with materials that are compatible with the wastes managed in the tank systems ? (.05.10-4B(3))	✓ Yes	___ No	___ N/A
(c) designed and constructed having sufficient strength and thickness to prevent failure caused by pressure gradients (static head, external hydrologic forces), physical contact with waste, climatic conditions, and stresses of daily operation (including stresses from vehicular traffic) ? (.05.10-4B(4))	✓ Yes	___ No	___ N/A
(d) placed on a foundation or base capable of providing support, resistance to pressure gradients above and below the system, and capable of preventing failure due to settlement, compression or uplift ? (.05.10-4B(5))	✓ Yes	___ No	___ N/A

(e) provided with a leak detection system designed and operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any released waste or accumulated liquid in the secondary containment system within 24 hours ? (.05.10-4B(6))	___ Yes	✓ No	___ N/A
(f) sloped or otherwise designed or operated to drain and remove liquids from leaks, spills or precipitation ? (.05.10-4B(7))	✓ Yes	___ No	___ N/A
23. Have spilled or leaked waste and accumulated precipitation been removed from the secondary containment system within 24 hours? (.05.10-4C)	___ Yes	___ No	✓ N/A ROOF ON BUILDING NO SPILLAGE
24. Has secondary containment been provided by a liner, vault, double walled tank, or equivalent device approved by the Secretary ? (.05.10-4D)	✓ Yes	___ No	___ N/A
25. Does the secondary containment device meet the requirements of COMAR 26.13.05.10-4E ?	✓ Yes	___ No	___ N/A

(external liner: provide 100% of capacity of largest tank within liner; prevent run-on or infiltration unless additional capacity to contain 25-year, 24-hour rainfall event; free of cracks or gaps; cover all surrounding earth likely to come in contact with released waste.

vault system: provide 100% of capacity of largest tank within vault; prevent run-on or infiltration unless additional capacity to contain 25-year, 24-hour rainfall event; chemical resistant water stops at any joints; impermeable interior coating or lining compatible with waste which will prevent migration of waste into material of construction of vault; for ignitable or reactive wastes, provided with means to protect against formation and ignition of vapors within vault; provided with means to prevent migration of moisture into vault if vault is subject to hydraulic pressure.

double walled tanks: designed as integral structure, so that any release from inner shell is contained by outer shell; if constructed of metal, protected from corrosion of primary tank interior and external surface of outer shell; provided with built-in continuous leak detection system capable of detecting a release within 24 hours.)

26. Has ancillary equipment, except for equipment described in COMAR 26.13.05.10-4F, been provided with secondary containment by the appropriate deadline for the tank system ? (.05.10-4F)	___ Yes	✓ No	___ N/A
27. If ancillary equipment has not been provided with secondary containment, based on the exceptions listed in COMAR 26.13.05.10-4F, have inspections for leaks been performed on a daily basis ? (.05.10-4F)	___ Yes	✓ No	___ N/A
28. For nonenterable underground tanks that have not been provided with secondary containment, has the owner or operator conducted at least annually a leak test that meets the requirements of COMAR 26.13.05.10-2C(5) ? (.05.10-4G(1))	___ Yes	___ No	✓ N/A
29. For other than nonenterable underground tanks, if the tank has not been provided with secondary containment, has the owner or operator conducted at least annually a leak test that meets the requirements of COMAR 26.13.05.10-2C(5), or developed and implemented a schedule and procedure for an assessment of the overall condition of the tank system by an independent, qualified registered professional engineer ? (.05.10-4G(2))	___ Yes	✓ No	___ N/A

30. If an assessment of the overall condition of the tank is required under item 29, does the assessment meet the following requirements:			
(a) is the schedule and procedure of the assessment adequate to detect obvious cracks, leaks and corrosion or erosion which may lead to cracks or leaks ?; (.05.10-4G(3)(a))	___ Yes	✓ No	___ N/A
(b) if necessary, is stored waste removed from the tanks to allow the condition of all internal tank surfaces to be assessed ?; (.05.10-4G(3)(b))	___ Yes	✓ No	___ N/A
(c) is the frequency of the assessment based on the material of construction of the tank and its ancillary equipment, the age of the system, the type of corrosion or erosion protection used, the rate of corrosion or erosion observed during the previous inspection, and the characteristics of the waste being stored or treated ? (.05.10-4G(3)(c))	___ Yes	✓ No	___ N/A
31. For ancillary equipment that has not been provided with secondary containment, has a leak test or other integrity assessment been performed at least annually ? (.05.10-4G(4))	___ Yes	✓ No	___ N/A
32. Has the owner or operator maintained on file at the facility a record of the results of assessments of tank integrity performed on tanks without secondary containment ? (.05.10-4G(5))	___ Yes	✓ No	___ N/A
. Has the owner or operator complied with the requirement of COMAR 26.13.05.10-6 (concerning leaks, spills and disposition of leaking or unfit-for-use tank systems) if a tank system or component was found to be leaking or unfit for use as a result of an assessment of tank integrity ? (.05.10-4G(6))	___ Yes	___ No	✓ N/A
<u>26.13.05.10-6 Leaks, Spills and Disposition of Leaking or Unfit-for-Use Tank Systems.</u>			
34. For a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use, has the owner or operator:			
(a) immediately removed the tank system from service ? (.05.10-6A(1))	___ Yes	___ No	✓ N/A
(b) immediately stopped the flow of hazardous waste into the tank system or secondary containment system ? (.05.10-6A(2))	___ Yes	___ No	✓ N/A
(c) inspected the system to determine the cause of the release ? (.05.10-6A(3))	___ Yes	___ No	✓ N/A
(d) removed waste from the tank system or secondary containment system within 24 hours after detection of the leak if the release was from the tank system ? (.05.10-6A(4)(a))	___ Yes	___ No	✓ N/A
(e) removed all released materials within 24 hours if the material was released to a secondary containment system ? (.05.10-6A(4)(b))	___ Yes	___ No	✓ N/A
(f) contained visible releases to the environment by immediately conducting a visual inspection of the release and, based upon the inspection: (a) acted to prevent further migration of the leak or spill to soils or surface water, and (b) removed, and properly disposed of, any visible contamination of the soil or surface water ? (.05.10-6A(5))	___ Yes	___ No	✓ N/A

(g) reported the release to the Secretary within 24 hours of the release's detection, unless the quantity of the leak or spill was 1 pound or less and the leak or spill was immediately contained and cleaned up ? (.05.10-6A(6)(a))	___ Yes	___ No	✓ N/A
(h) submitted to the Secretary within 30 days of detection of the release, a report containing the information required in COMAR 26.13.05.10-6A(6)(b), unless the quantity of the leak or spill was 1 pound or less and the leak or spill was immediately contained and cleaned up ? (.05.10-6A(6)(b))	___ Yes	___ No	✓ N/A
(i) closed, repaired, or provided secondary containment for the tank system in accordance with the requirements of COMAR 26.13.05.10-6A(7) ? (.05.10-6A(7)(a))	___ Yes	___ No	✓ N/A
(j) obtained a certification by an independent, qualified, registered, professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning a tank system to service that has been repaired in accordance with COMAR 26.13.05.10-6A(7) for which the repair has been extensive ? (.05.10-6A(8))	___ Yes	___ No	✓ N/A
(k) submitted the certification required in item 28(j) to the Secretary not later than 5 days before the tank system is returned to use ? (.05.10-6A(9))	___ Yes	___ No	✓ N/A
end			

9. Land Disposal Restrictions Checklist

I. GENERAL INFORMATION

Facility: STONE INDUSTRIAL

U.S. EPA ID No.: MDD 058594920

Street: 9207 51 ST AVE

City: COLLEGE PARK State: MD Zip: 20740 - 1910

Telephone: 301 474 3100

Inspection Date: 03/31/94 11 Time: _____ (am/pm)

Weather Conditions: COOL, CLOUDY

	Name	Agency/Title	Telephone
Inspectors:	J LEAMAN	MDE	410 631 3400
Facility Representatives:	J EASTD		301 474 3100

See Appendix B to determine which of the following LDR waste codes exist in the following categories at the facility:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents					
F003, F005, F001					
F020-F023 and F026-F028					
NA					

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California List

NA

First Third
(40 CFR 268.101)

NA

Second Third
(40 CFR 268.11)

NA

Third Third
(40 CFR 268.12)

NA

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INSPECTION SUMMARY

Processes That Generate LDR Wastes:

— BASKET SUPPORT WASHWATER, FLOOR WASHDOWN DOZ

— MEK RECOVERY STILL — F003, D035, F005

LDR Waste Management:

OK

Summary:

Signature: J Leyen

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II. WASTE IDENTIFICATION

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

1. F001 through F005 spent solvents (§268.30):
   F001, 003, 005

2. F020-F023 and F026-F028 dioxin-containing wastes (§268.31):
   NA

3. California List Wastes (§268.32) (See Appendix A):
   NA

4. First Third Wastes (§268.33):
   NA

5. Second Third Wastes (§268.34):
   NA

6. Third Third Wastes (§268.35)**:
   NA

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs were required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. The LDR applies to EP toxic wastes and not to "newly identified" wastes which exhibit TC. TC wastes will be regulated under 40 CFR Part 268 only after they have been designated with LDR treatment codes or standards. Even if the former EP waste is also TC characteristic, it is only subject to LDR if it continues to fail the EP. If it fails the TC, it will not be subject to LDR until EPA has established a new treatment standard.

B. Waste Code Determination

1. Have all waste codes been correctly identified for purposes of compliance with §§268.9 and 262.11.*

   Yes ✓ No____

   If no, list below:

   Assigned Classification Correct Classification

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* Areas of concern (See Section 2.0) include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments:_____

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

Yes ✓ No ___ NA ___

Comments:_____

3. Is the waste classified as D001, non-High TOC Ignitable Liquids Subcategory? If so, has the waste been treated by INCIN, FSUBS, or RORGS? Has the generator determined the underlying hazardous constituents (as defined in §268.2) that are reasonably expected to be present in the waste? (§268.9(a))

Yes ___ No ✓ NA ___

Comments:_____

4. Is the waste classified as D002, and prohibited under §268.37? Has the generator determined the underlying hazardous constituents (as defined in §268.2) that are reasonably expected to be present in the waste?

Yes ✓ No ___ NA ___

Comments:_____

5. Has multi-source leachate been assigned the F039 waste code?* (§261.31)

Yes ___ No ___ NA ✓

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

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

Yes ___ No ___

Comments:_____

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

1. Debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A (expires - 05/08/94). (§268.5)

   Yes ___ No ✓ List _____

2. Inorganic solid debris as defined in §268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/94). (§268.35(c))

   Yes ___ No ✓ List _____

   *Note: Incorrect reference (§268.2(a)(7)) in Third Third rule.

3. Debris contaminated with wastes listed in §268.12, and/or debris contaminated with any characteristic wastes for which treatment standards are established in Subpart D of Part 268 (expires 05/08/94). (§268.35(e)(1))*

   Yes ___ No ✓ List _____

   *Note: Generator must demonstrate a good faith effort to locate treatment capacity suitable for its waste, utilize such capacity if found available, or file a report as required by §268.5(g) by August 12, 1993 or within 90 days after the hazardous waste is generated (whichever is later) describing the generator's efforts to locate treatment capacity.

4. Mixed radioactive hazardous debris contaminated with wastes listed in §268.12 and mixed with radioactive hazardous debris contaminated with any characteristic waste for which treatment standards are established in 40 CFR Part 268, Subpart D (expires 05/08/94). (§268.35(e)(2))*

   Yes ___ No ✓ List _____

   *Note: Generator must demonstrate a good faith effort to locate treatment capacity suitable for its waste, utilize such capacity if found available, or file a report as required by §268.5(g) by August 12, 1993 or within 90 days after the hazardous waste is generated (whichever is later) describing the generator's efforts to locate treatment capacity.

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III. GENERATOR REQUIREMENTS

A. Wastewater/Non Wastewater Category and Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate Wastewater/Non Wastewater Category and treatment standard for each F-solvent?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Non Wastewater
F001, 003, 005, F035		✓

Comments ___

* Less than 1 percent by weight total organic carbon (TOC), or less than 1 percent by weight total F001- F005 solvent constituents listed in §268.41, Table CCWE. (§268.2(f)(1))

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ✓

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Non Wastewater

Comments ___

* Less than 1 percent TOC by weight and less than 1 percent total suspended solids (TSS) by weight. (§268.2(f))

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ___ No ___ NA ✓

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If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Non Wastewater

* Less than 1 percent TOC by weight and less than 1 percent total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters (as generated) -- less than 5 percent by weight TOC and less than 1 percent by weight TSS; K103 and K104 wastewaters (as generated) - less than 4 percent by weight TOC and less than 1 percent by weight TSS. (§268.2(f)(2) and (3))

Comments _____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? (§268.9 (b))

Yes ___ No ___ NA ✓

c. Does the generator specify alternative treatment standards for lab packs?* (268.42(c))

Yes ___ No ✓ NA ___

*Use of the alternative treatment standards is not required. (55 FR 22629)

If yes, do lab packs only contain the following wastes?* (§268.42(c)(2))

___ Organometallics: Part 268, Appendix IV constituents
___ Organics: Part 268, Appendix V constituents

* Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. (55 FR 22629)

d. Does the generator specify the treatment standards for the relevant F039 multi-source leachate constituents?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is required. (55 FR 22619)

4. California List Wastes: Has the generator correctly identified the wastewater/non wastewater category and treatment standard/prohibition level for the following wastes? (55 FR 22675)

a. Liquid hazardous wastes containing PCBs ≥50 ppm (268.32(a)(2))

Yes ___ No ___ NA ✓

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If yes, check the appropriate category (treatability group) (see §268.42(a)(1)):

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or ≥1,000 mg/kg HOCs, (non-liquids), which are not declared hazardous by the HOC content (55 FR 22675)

Yes ___ No ✓ NA ___

If yes, check the appropriate category (see §268.42(a)(2)):

___ Dilute HOC wastewater with 1,000 mg/l to 10,000 mg/l HOCs) (268.32(a)(3))
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids) (268.32(e)(1) and (2))

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥134 mg/l nickel and/or ≥130 mg/l thallium (55 FR 22675)

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a waste stream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal. List Applicability	Expiration Date
___	___	___/___/___
___	___	___/___/___
___	___	___/___/___

Comments ___

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6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in §268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in §268.42, the alternative method, and documentation of approval. (§268.42(b))

Waste Code	Required Technology	Alternative Method	Approval

Comments _____

7. Does the generator mix multiple restricted wastes all containing a common constituent of concern, but which have different treatment standards?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? (§§268.41(b) and 268.43(b))

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* (§268.7(a) (53 FR 31208))

Yes ✓ No ___

* Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect (52 FR 25765).

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b through d does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

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a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. (§268.7(a)(5))

D001, F001, 003, 005, D035, D002

b. TCLP*: Are wastes with treatment standards specified in §268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ___ No ✓ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (Part 268, Appendix I, EPA Test Method 1311).

**See Section 268.40(a) for options for using TCLP or EP test methods.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, identify the frequency of testing, and note any problems. Attach test results. (§268.7(a)(5))

c. Total constituent analysis: Are wastes with treatment standards specified in §268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ✓ NA ___

*See Appendix C for exceptions.
If yes, list the wastes for which total constituent analysis was used and provide the date of last test, identify the frequency of testing, and note any problems. Attach test results. (§268.7(a)(5))

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d. Is the paint filter liquids test (PFELT) used to determine if California List wastes are *liquid* hazardous wastes?

Yes ___ No ___ NA ___

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, identify the frequency of testing, and note any problems. Attach test results. (§268.7 (a)(5))

_____

_____

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under §262.34 (permissible in some states)?

Yes ___ No ___ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? (§268.7(a)(4))

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? (§268.7(a)(4)(i))

___ Based on a detailed chemical and physical analysis of a representative sample

___ Contains information necessary to treat the wastes in accordance with Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? (§268.7(a)(4)(ii))

Yes ___ No ___

Comments _____

_____

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4. Dilution Prohibition (§268.3):

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix C for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? (55 FR 22666)

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? (55 FR 22665-22666)

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.)

___ Characteristic wastes managed in treatment systems regulated under the Clean Water Act (§268.3(b)), (55 FR 22665)
___ Treatment standard specified in §§268.41 or 268.43

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a and b, and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? (§268.3(a))

Yes ___ No ✓

Comments _____

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5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in §§268.41 and 268.43? (55 FR 22620)

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

a. Are restricted wastes treated or (other than in a RCRA exempt unit) stored for greater than 90 or 180 days, or disposed on site?

Yes ✓ No ___

(If yes, the TSD Checklist must also be completed.)

Comments 700 GAL TANK STORES D002 > 90 DAYS/ACCUM STORE START DISPOSING WITH 90 DAYS IMMEDIATELY UPON DETERMINATION ~~[illegible]~~ TANK ~~[illegible]~~ DOES NOT ALLOW FOR EXTENSION — VIOLATION WAS NOT DETERMINED THAT THE TANK IS A PROCESS TANK, NOT WASTE TANK

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? (§268.7(a)(6)) (55 FR 22662)

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted prior to entering the exempt unit (§268.7(a)(6)) until the applicable treatment standards are met?* (§268.9(d))

Yes ___ No ___ NA ✓

* This applies to both concentration based treatment standards specified in §§268.41 and 268.43, and to some §268.42 required methods which result in treatment below the characteristic level. See Appendix D.

d. If a waste is excluded from regulation or from the definition of solid or hazardous waste subsequent to the point of generation, does the generator comply with the requirements of §268.7(a)(6) (56 FR 3866-3867)? If the generator determines that he is managing a restricted waste that is excluded from the definition of hazardous or solid waste or exempt from Subtitle C regulation, under §§261.2-261.6 subsequent to the point of generation, is there a one-time notice in the facility's file stating such generation, subsequent exclusion from the definition of hazardous or solid waste or exemption from Subtitle C regulation, and the disposition of the waste?

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2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards/ prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D002	DUPONT IDEQUATER NJ
D001, F003, D001,	SOUTHEASTERN CHEMICAL
D005, D035	& SOLVENT, SUMTER, S.C.

Does the generator provide a notification to the treatment or storage facility? (§268.7(a)(1))

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in §268.7(a)(8) or (9) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to §62.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? (§268.7(a)(10))

Yes ___ No ___ ND

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3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility

Does the generator provide a notification and a certification to the disposal facility? (§268.7(a)(2)(i) and (ii))?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to §262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? (§268.7(a)(10))

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

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Complete the following table:

Waste Code	Receiving Facility

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? (§§268.9(d)(1) and 268.7(b)(5))?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (Part 268, Subpart C), or case-by-case extension (§268.5)?

Yes ___ No ___ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility

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 ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to §262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

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Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? (§268.7(a)(10))

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? (§268.7(a)(7))

Yes ✓ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? (§268.9)

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ✓

* See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments_____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (e.g., distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ✓ No ~~GO~~ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
D001, ~~F003~~	DISTILLATION	LS15, 380 SYSTEMS
F003 F005		
D035		

2. Are treatment residuals generated from these units?

Yes ✓ No ___

Comments_____

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3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes ___ No ✓ NA ___

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

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April 25, 1994

Letter regarding malfunction of Regenerative Thermal Oxidizer

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

April 25, 1994

RECEIVED
APR 29 1994
AIR & RADIATION
MANAGEMENT ADMINISTRATION

Maryland Department of the Environment
Air & Radiation Administration
2500 Broening Highway
Baltimore MD 21224

Attention: Mr. Ross Oliver

Dear Ross:

This letter is in reference to the malfunction of the Regenerative Thermal Oxidizer. This report follows the outline of COMAR 26.11.07.D.(2).

a. Installation - REECO Regenerative Thermal Oxidizer, Model WC-10, Serial #1162

b. Nature of the Emission - Volatile Organic Compound (VOC)

c. Time of occurrence and duration: Saturday, April 16, 1994, 8:30 a.m. - 11:45 a.m.

d. Excess emissions during the occurrence and calculations formulation G97MR.

Density of Formulation 7.59 lbs/gal
V.O.C. 5.20 lbs/gal
Total adhesive mix and solvent from winders 274.0 lbs and 58.0 lbs
Total gal used 36.10
36.10 gal x 5.20 lbs/gal = 187.72 lbs V.O.C.

187.72
+58.00
245.72 lbs V.O.C. for 6 hours

$\frac{245.72}{6}$ = 40.95 lbs/hr

40.95 x 3.25 hrs = 133.09 lbs V.O.C.

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 474-3100
FAX (301) 345-2367

Stone Industrial
Paramount Tube
Timms Spring
Michigan Spring

Estimated emissions for 3.25 hrs 133.09 V.O.C.

at 2.9 lbs/gal V.O.C. our emissions for this time frame would be:

36.10 gal x 2.9 lbs/gal = 104.69

$\frac{104.69}{6}$ = 17.45 lbs/hr V.O.C.

17.45 lbs/hr x 3.25 hr. = 56.71

133.09
-56.71
76.38

76.38 lbs V.O.C. excess estimated emissions

e. Actual or probable cause of occurrence:

A severe thunder storm caused an electrical power interruption. This in turn caused the RTO to malfunction. The department supervisor restarted the equipment. However, the variable frequency drive control system dropped off line, which was not a normal occurrence.

Also, when the supervisor called a maintenance person at home there was miscommunication as to the internal indicator lights.

The malfunction was fully corrected by Joe Di Silvio on Sunday. It was then that he realized the unit was not in correct operation part of the day on Saturday.

f. Method of correcting the cause:

We have written an "RTO Fault Correction Procedure" document. This will be posted at the exit from Building 2 to the RTO area. Copies will be given to those persons responsible for clearing an RTO fault. Please see attached. Also, should the RTO fail to respond to the "Fault Corrective Procedures" a list of "Responsible Personnel" to notify will be included with this document. There will be periodic reviews of the procedures.

MD Dept of the Environment
April 25, 1994

g. A list of all occurrences of excess emissions:

Duration - March 3, 1994, 9:00 a.m. - March 4, 1994, 2:00 a.m.
Cause - Faulty Telmar Ramp generator

h. Copy of Maintenance Plan:

Enclosed

i. Documentation that the plan is being carried out:

Enclosed

j. Steps taken or planned to prevent the reoccurrence of excess emissions:

Fault correction procedure plan; see enclosed

Additional information pertaining to this report which we consider confidential is maintained in a support file.

Sincerely yours,

STONE INDUSTRIAL
Precision Products Group, Inc.

John H. Easto

John H. Easto
Chief Engineer

JHE:ses
Encls

R-1019

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT

R-1019

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT
12/29/93		RE	REPLACED HYDRAULIC FILTER
4/1/94		DW	REPLACED #1 EXHAUST VALVE
			PROX SWITCH
4/1/94		JA	REPLACED RAMP GENERATOR
4/4/94		DW	REPLACED VFD AIR FILTERS
4/6/94		DW	GREASED INLET & EXHAUST VALVE ACTUATORS
			GREASED LOWER AUMA VALVE ACTUATORS
			GREASED MAIN BLOWER PILLOW BLOCKS
			CLEANED UV SCANNER LENS
			RETIGHTENED MAIN BLOWER ESTOP
			GREASED MAIN BLOWER MOTOR
			GREASED ROOF TOP AUMA ACTUATORS
			GREASED ROOF TOP FAN MOTOR
			RETIGHTENED BELTS & APPLIED SOME
			BELT DRESSING
			REPLACED HYDRAULIC FILTER
			CLEANED TANK MESH FILTER
			REMOVED HYDRAULIC FLUID CLEANED
			TANKED REPLACED HYDRAULIC
			FLUID CHECKED & TIGHTENED
			460 TERMINALS VFD CHECKED
			TERMINALS IN CONTROL PANEL FOUND
			LOOSE SENSOR WIRE ON TEMPERATURE CONTROL
4/[illegible]		[illegible]	CLEAN BURNER BLOWER MOTOR FILTER
4/20/94		DW	READJUSTED VALVE TRAVEL TIME

OPERATORS RECORD

OPERATOR WINDER NO._____

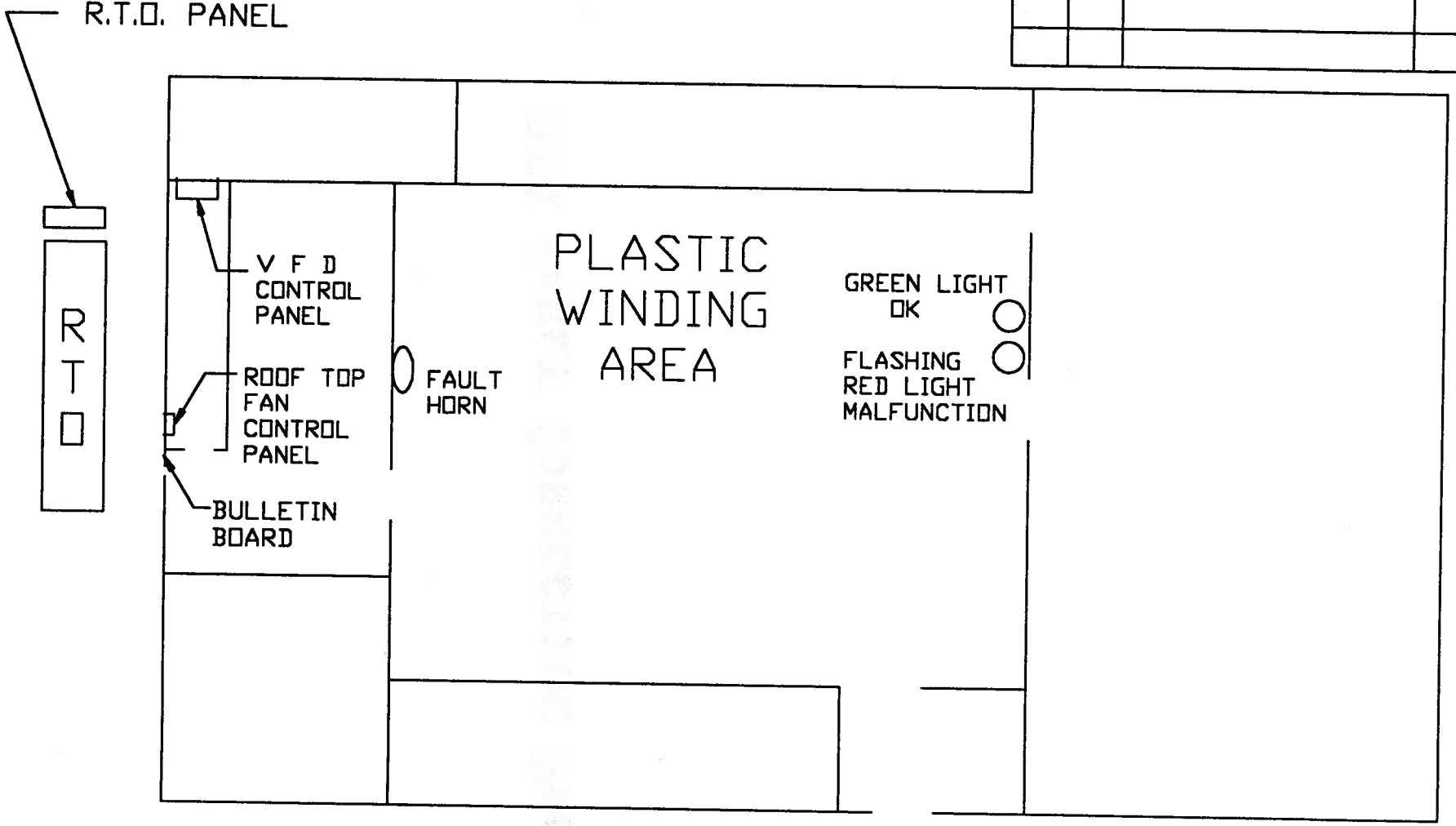
DAY_____

NIGHT_____

DATE	SHIFT	GLUE TYPE	GLUE START lbs	GLUE ADD lbs	GLUE END lbs	GLUE USED lbs	VISCOMETER JUG MEK START lbs	VISCOMETER JUG MEK ADD lbs	VISCOMETER JUG MEK END lbs	WASH MEK FRESH lbs	TOTAL MEK USED lbs
	D										
	N										
	D										
	N										
	D										
	N										
	D										
	N										
	D										
	N										
	D										

RTO Fault Correction Procedure

REV.	LOC.	DESCRIPTION	DATE	BY



TOLERANCES-UOS			SCALE	
LINEAR INCH		ANGULAR	MATERIAL	
X.XX	.010		QUANTITY	
X.XXX	.005		ASSEMBLY	

MACHINE & PART NAME

R.T.O. FAULT CORRECTION PROCEDURE

DRAWN BY	JHE	
CHECKED		
APPROV.		

RTO-VFD2

STONE INDUSTRIAL
a member of the Precision Products Group Inc.

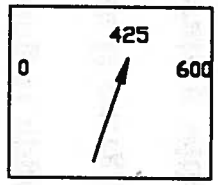
RTO
NORMAL OPERATION

1. RTO operating at approx 1400°
2. Roof Top fan is energized
3. VFD is operating with a fluctuation of approx 75% to 95% of maximum speed
4. Green light near supervisor's desk is on, indicating plastic winder fumes are being exhausted into the RTO

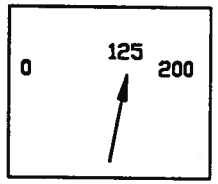
REV.	LOC.	DESCRIPTION	DATE	BY

V F D
FAULT / RESET

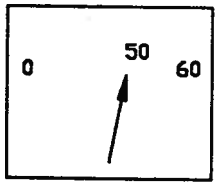
POWER ON



MOTOR
VOLTAGE



MOTOR CURRENT



MOTOR FREQ.

START

STOP

POWER ON - RED LIGHT ON
V F D - RED LIGHT OFF
VOLTAGE - MAY VARY 100-460 VOLTS
CURRENT - MAY VARY 40-150 AMPS
FREQ. - MAY VARY 15-60 HZ

V F D NORMAL OPERATION

TOLERANCES-UOS			SCALE	
LINEAR	INCH	ANGULAR	MATERIAL	
X.XX	.010		QUANTITY	
X.XXX	.005		ASSEMBLY	

MACHINE & PART NAME
V F D CONTROL PANEL

DRAWN BY		
CHECKED		
APPROV.		

RTOVFD1

STONE INDUSTRIAL
a member of the Precision Products Group Inc.

RTO Fault Correction Procedure
Alarm Horn Sounds
Red Warning Light Flashes

1. Go to RTO Main Control Panel (obtain Fault Record Book located at bulletin board as you exit building). Silence alarm by toggling top right annunciator switch to ACK.

2. Record which fault lights are indicating a fault has occurred.

3. Clear fault by toggling top right annunciator switch to RESET and ACK

4. Check main blower (Retherm exhaust fan green light). If main blower is off, check red fault light on VFD control panel; if light is on push to reset.

5. If Burner #1 and/or Burner #2 are not on, place burner mode switch in light position. After modulator control moves to low fire, hold burner ignition push buttons for 2-3 seconds until burners fire. Place burner mode switch in run position.

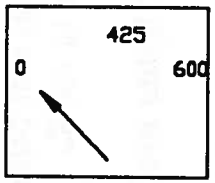
6. If unable to clear faults, notify responsible personnel.

If all faults are cleared but temperature dropped below 1200°, it will be approx. 30 minutes before RTO will accept process and green light near supervisor's desk will be on.

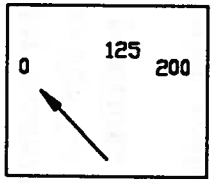
REV.	LOC.	DESCRIPTION	DATE	BY

V F D
FAULT / RESET

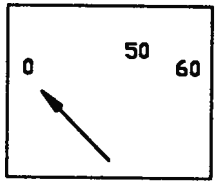
POWER ON



MOTOR
VOLTAGE



MOTOR CURRENT



MOTOR FREQ.

START

STOP

POWER ON -------- RED LIGHT OFF

V F D -------- RED LIGHT ON

VOLTAGE -------- 0

CURRENT -------- 0

FREQ. -------- 0

V F D FAULT CONDITION

TOLERANCES-UOS			SCALE		MACHINE & PART NAME	DRAWN BY			RTOVFD1
LINEAR	INCH	ANGULAR	MATERIAL		V F D CONTROL PANEL	CHECKED			STONE INDUSTRIAL
X.XX	.010		QUANTITY			APPROV.			
X.XXX	.005		ASSEMBLY						

REV.	LOC.	DESCRIPTION	DATE	BY

HYDRAULIC FAULT

HIGH TEMP EXHAUST FAN CENTRAL CHAMBER

PROCESS ISOLATION

PURGE OR COMBUSTION AIR PRESSURE

FRESH AIR OR FUEL VALVE

FUEL PRESSURE FAULT

FLAME OUT

VALVE FAILURE

EXHAUST FAN HIGH VIBRATION

ANNUN-CIATOR

CHECK THOSE LIGHTS WHICH ARE ON AT TIME OF FAULT

DATE_____ TIME_____AM/PM

INITIAL_____

RE-START DATE_____ TIME_____AM/PM

INITIAL_____

TOLERANCES-UOS			SCALE	
LINEAR	INCH	ANGULAR	MATERIAL	
X.XX	.010		QUANTITY	
X.XXX	.005		ASSEMBLY	

MACHINE & PART NAME R.T.O. FAULT RECORD

DRAWN BY	J.H.E.	7/27 93	R.T.O.-2
CHECKED			STONE INDUSTRIAL
APPROV.			

RTO Fault Procedure Training

Name	Date	Signature
Bobby Drakeford	4/18/94	Bobby Drakeford
Randy Garrett	4/18/94	Randy Garrett
Don Shumate	4/26/94	D.S. Don Shumate
Johnny Penkert	4/27/94	[illegible]
Paul Mills	4/27/94	Paul Mills
Armond Torre	4/27/94	C.T. C. Torre
Dennis McGarity	4-27-94	Dennis McGarity
Toby Moore	4-27-94	Toby Moore

Responsible Personnel

Name	Ext	Home Phone
Joe Di Silvio	281	(703) 425-6702
John Easto	282	(301) 384-4147
Venky Ketty	289	(410) 551-0658
Don Wittlinger	216	(410) 795-6653
Ronnie Evans	210	(410) 741-1863

May 24, 1994

Letter regarding malfunction of Regenerative Thermal Oxidizer

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

May 24, 1994

RECEIVED
MAY 26 1994

Maryland Department of the Environment
Air & Radiation Administration
2500 Broening Highway
Baltimore, MD 21224

Attention: Mr. Ross Oliver

Dear Mr. Oliver:

This letter is in reference to the malfunction of the Regenerative Thermal Oxidizer. This report follows the outline of COMAR 26.11.07.D.(2).

a. Installation - REECO Regenerative Thermal Oxidizer, Model WC-10, Serial #1162.

b. Nature of the emission - Volatile Organic Compound (VOC)

c. Time of the occurrence and duration: Monday, May 16, 1994, 5:20 p.m. - 8:10 p.m.

d. Excess emission during the occurrence and calculations for formulation G97MR.

Density of Formulation 7.59 lbs/gal
V.O.C. 5.20 lbs/gal
Total adhesive mix and solvent from the winders
Adhesive mix used 413.9 lbs
MEK used 149.5 lbs
Total gal used @ 7.59 lbs/gal = 54.53 gal
54.53 gal x 5.20 lbs/gal = 283.57 lbs V.O.C.

$$\begin{array}{rl} & 283.57 \\ + & \underline{149.50} \\ & 433.07 \text{ lbs V.O.C. for 18 hours} \end{array}$$

$$\frac{433.07}{18} = 24.06 \text{ lbs/hr}$$

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 474-3100
FAX (301) 345-2367

Stone Industrial
Paramount Tube
Timms Spring
Michigan Spring

24.06 x 3 = 72.18 lbs V.O.C.
Estimated emissions for 3 hours 72.18 lbs

At 2.9 lbs/gal V.O.C. our emissions for this time frame would be:
54.53 gal x 2.9 lbs/gal = 158.14

$\frac{158.14}{18}$ = 8.78 lbs/hr

8.78 x 3 = 26.36 lbs V.O.C.

$$\begin{array}{r} 72.18 \\ -\ \underline{26.36} \\ 45.82 \end{array}$$

45.82 lbs V.O.C. excess estimated emissions

e. Actual or probably cause of occurrence:

At 5:20 p.m. there was an electrical power interruption which caused the R.T.O. to malfunction. The chief plant electrician found two fault lights energized: "Purge or Combustion Air Pressure" and "Flame Out". When he attempted to clear these the "Purge or Combustion Air Pressure" would not clear. The main control panel was opened and he began to troubleshoot the various circuits of the controller. First indication was that the relay and/or the purge valve actuator motor might be the problem. In order to get the R.T.O. operational, the valve was manually operated by the hand crank. The R.T.O. was up to temperature by 8:10 p.m. On Tuesday morning Mike Sickels, Service and Startup Manager of REECO was contacted. He suggested additional troubleshooting and it was then felt that the power interruption may have damaged the printed circuit board for the purge valve actuator.

f. Method of correcting the cause of the excess emissions: A new valve actuator assembly is on order. Those responsible for the operation of the R.T.O. have been given training and written instruction as to how to manually operate this valve in the event of another malfunction before the new unit is installed.

g. List of all occurrences of excess emissions

(1) March 3, 1994; 9:00 a.m. - March 4, 1994 2:00 a.m.

Cause - Faulty Telmar Ramp Generator

(2) April 16, 1994; 8:30 a.m. - 11:45 a.m.

Cause - Power interruption due to severe storm and variable frequency drive system not energized.

h. Copy of maintenance plan:

Enclosed

i. Documentation that the plan is being carried out:

Enclosed

j. Steps taken to/or planned to prevent the reoccurrence of excess emissions:

New valve control assembly on order

Additional information pertaining to this report which we consider confidential is maintained in the support file.

Sincerely yours,

STONE INDUSTRIAL
Precision Products Group, Inc.

John H Easto

John H. Easto
Chief Engineer

JHE:ses

REV.	LOC.	DESCRIPTION	DATE	BY

HYDRAULIC FAULT	HIGH TEMP EXHAUST FAN CENTRAL CHAMBER	PROCESS ISOLATION	PURGE OR COMBUSTION AIR PRESSURE	FRESH AIR OR FUEL VALVE	FUEL PRESSURE FAULT	FLAME OUT	VALVE FAILURE	EXHAUST FAN HIGH VIBRATION	ANNUN-CIATOR
○	○	○	X	○	○	X	○	○	○

CHECK THOSE LIGHTS WHICH ARE ON AT TIME OF FAULT

DATE 5/16/94 TIME 5:20 PM AM/PM

INITIAL [illegible]

RE-START DATE 5/16/94 TIME 8:10 PM AM/PM

INITIAL [illegible]

TOLERANCES-UOS			SCALE	
LINEAR	INCH	ANGULAR	MATERIAL	
X.XX	.010		QUANTITY	
X.XXX	.005		ASSEMBLY	

MACHINE & PART NAME R.T.O. FAULT RECORD

DRAWN BY	J.H.E.	7/27 93
CHECKED		
APPROV.		

R.T.O.-2

STONE INDUSTRIAL

Research-Cottrell
REECO

May 9, 1994

Stone Industrial
9207 51st Avenue
College Park, MD 20740-1910

Attention: Mr. Joe DiSilvio

Subject: REECO Project No. C300761

Dear Joe:

As the RE-THERM Thermal Oxidizer as provided by REECO under the subject project number has been on line since the summer of 1993 and you have not been experiencing any major difficulty operating same, REECO is now formally closing out the project internally here at our offices. This means that the records for this project will now be transferred to our local storage area to allow for better access for our post contracts departments.

As in the past when you have been experiencing some warranty related difficulties, please continue to contact our Mr. Mike Sickels, Service and Start-Up Manager at (908) 685-4354. If Mike is unavailable due to being out of the office for some other customers needs, please contact me if you require some immediate assistance in his absence. Once the warranty portion of the contract is completed, your contacts from that point on will be in the service and maintenance group, the contact for which will be Mr. Jack Clark. He can be reached at (908) 685-4245. Mr. Sickels will advise you formally when the warranty portion has been completed.

In a recent message left on my voice mail, your Mr. John Easto requested a caution sign be sent to your facility and one is attached to this letter. If you require anything further along these lines, please do not hesitate to give me a call.

I have enjoyed very much our contacts across the past few years in providing Stone Industrial with the equipment to address your process VOC concerns. Should you require anything further from me or any member of our staff, do not hesitate to contact us at your convenience.

Very Truly Yours,

Jim Shields

James D. Shields
Project Manager

JDS:amk/JDS94.018
cc: E. Biedell
N. Confuorto
R. Sacco
M. Sickels

Cc: John E.
Venky
Don W.
Ronnie

REECO - Regenerative Environmental Equipment Co., Inc.
U.S. Highway 22 West and Station Road, Branchburg, NJ 08876-3599
Mailing Address: PO Box 1500, Somerville, NJ 08876-1251
908-685-4000 FAX 908-685-4074

Recycled Paper
Affiliates of Air & Water Technologies Corporation AWT

IF RTO GOS DOWN
AND

PURGE COMPLETE, RETHERM READY
AND AMBER PURGING LIGHT WILL
NOT LIGHT

MANUALLY OPEN FRESH AIR
VALVE (YOU MUST HOLD CRANK
HANDLE OUT WHILE TURNING)

THIS WILL BRING ON PURGE LIGHT
AND THEN PURGE COMPLETE
ENSURE BURNER FIRES

AFTER RETHERM READY LIGHT
COMES ON BE CLOSE FRESH AIR
VALVE (AGAIN YOU MUST
PULL CRANK OUT WHILE TURNING)

THIS IS A TEMPORARY
CONDITION UNTIL VALVE IS REPAIRED

Purchase Order

PURCHASE ORDER NO: 010407
PAGE: 1
DATE: 05/23/1994

STONE INDUSTRIAL

This Order Number Must Appear On All Invoices, Packages, Shipping Papers And Correspondence.

9207 51st Avenue • College Park, MD 20740-1910 • (301) 474-3100
FAX (301) 345-2367 • D.U.N.S. 18-818-8411

AN EQUAL OPPORTUNITY EMPLOYER

VENDOR ID: 000285
AUMA ACTUATORS INC
4 ZESTA DRIVE
PITTSBURGH PA
15202

SHIP TO:
STONE INDUSTRIAL INC
9207 51ST AVE
COLLEGE PARK MD
20740-1910 USA

TRANSPORT VIA: U.P.S. EXEMPT NUMBER: 04998885
FOB POINT: ORIGIN

.N#	ORDER QUANTITY	UM	ITEM NUMBER	PROMISED DOCK	UNIT PRICE	EXTEND PRICE	TAX
001		EA	SG05	06/28/1994	1750.00	1750.00	NO

DESCRIPTION: AUMA ACTUATOR - QUOTE #1062694
ORDER CONF. TO: DON O'DONNELL 052394
DEL. J. EASTO CHG. 606750013
FAX COPY OF P. O. AND CREDIT REF. TO. MR. O'DONNELL.

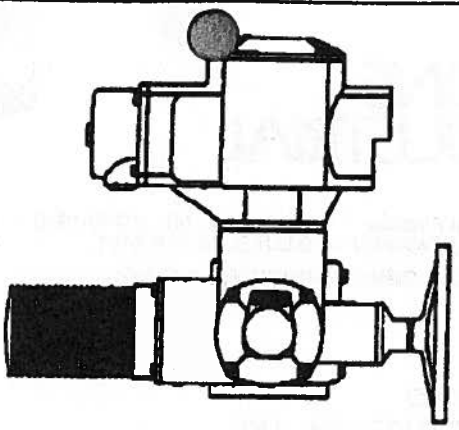
Lenky

UYER: BLD
UTHORIZED BY: Paul Mell

TOTAL EXTENDED AMOUNT
THIS PURCHASE ORDER: 1750.00

auma

AUMA ACTUATORS, INC.
4 ZESTA DRIVE
PITTSBURGH, PA 15205
PHONE (412) 787-1340 (EXT. 205)
FAX (412) 787-1223



TO	FROM
NAME: Venky Kerry	NAME: DON O'DONNELL
COMPANY: Stone Industrial	REF:
FAX NO.	DATE: 5/19/94

PAGE 1 OF 2

COMMENTS:

auma

AUMA Actuators, Inc.
4 Zesta Drive
Pittsburgh, PA 15205
Phone: 412-787-1340
Fax: 412-787-1223

Date: 5/19/94

Quotation No. 10626944

To: STONE INDUSTRIAL

Attn: VENKY KETTY

Project: DUPLICATE AUMA S.O.# 9207515

Inquiry No. _____

We are pleased to offer the following quotation:

Quantity ONE (1)

AUMA Model SG05

Power Supply 110 V / 1 ph / 60 hz Enclosure: NEMA 4

Limit Switches: ■ 2 GTLS [] 2 GTLS (12 contact) [] 4 GTLS (16 contact)

Closing Time / Operating Speed 30 SECONDS

Position Feedback Device: ■ Potentiometer
[] RWG [] LVDT (_____)

[] _____

[] _____

Motor Controls: ■ Norm [] Basic Compact [] AUMA Matic ____
[] Remote NEMA ____ Control Box

[] Reversing starters _____

[] Transformer [] Overload relays

[] _____ Pushbuttons / [] Control Switch (____/____/____)

[] Selector switch (____/____/____)

[] _____ Indicating Lights

■ Type 501 Positioner (4-20 mADC)

[] _____

[] Integral / [] Remote NEMA ____ Control Station
[] _____ Pushbuttons /[] Control Switch (____/____/____)
[] Selector Switch (____/____/____) [] _____ Indicating Lights

[] _____

■ Machined / [] Blank ■ Coupling [] A Drive Nut [] B Drive Nut

Net Price (each) $1750.00

Shipment: 4-6 weeks after receipt of order and engineering approval.

Payment Terms: Net 30 Days.

F.O.B. AUMA plant - Pittsburgh, PA [] _____

This quotation is valid for 90 days and is subject to AUMA's standard terms and conditions (TC 8/91).

Thank you for the opportunity to offer a quotation for your actuator requirements.

Prepared by: Timothy J. O'Donnell Jr. copy: _____

DOCUMENTATION ON THIS FORM MUST BE LEGIBLE , ACCURATE & UP-TO-DATE AT ALL TIMES

OPERATORS RECORD

OPERATOR

WINDER NO. 7

DAY

NIGHT

DATE	SHIFT	GLUE TYPE	GLUE START lbs	GLUE ADD lbs	GLUE END lbs	GLUE USED lbs	VISCOMETER JUG START lbs	MEK ADD lbs	END lbs	WASH MEK FRESH lbs	TOTAL MEK USED lbs
5/16	D		25.6				7.0				
	N			21.0	30.8			3.5, 3.5	6.5	20.5	
5/17	~~D~~ N		24.5	2.5, 0				3.5			
	N										
5/18	D		22.8				7.0	6.5, 6.5			
	N										
	D										
	N										
	D										
	N										
	D										

R-1019

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT
12/24/93		RE	REPLACED HYDRAULIC FILTER
4/1/94		DW	REPLACED #1 EXHAUST VALVE
			PROX SWITCH
4/1/94		JA	REPLACED RAMP GENERATOR
4/4/94		DW	REPLACED VFD AIR FILTERS
4/16/94		DW	GREASED INLET & EXHAUST VALVE ACTUATORS
↑		↑	GREASED LOWER AUMA VALVE ACTUATORS
			GREASED MAIN BLOWER PILLOW BLOCKS
			CLEANED UV SCANNER LENS
			RETIGHTENED MAIN BLOWER ESTOP
			GREASED MAIN BLOWER MOTOR
			GREASED ROOF TOP AUMA ACTUATORS
			GREASED ROOF TOP FAN MOTOR
			RETIGHTENED BELTS & APPLIED SOME
			BELT DRESSING
			REPLACED HYDRAULIC FILTER
			CLEANED TANK MESH FILTER
			REMOVED HYDRAULIC FLUID CLEANED
			TANKED REPLACED HYDRAULIC
			FLUID CHECKED & TIGHTENED
			460 TERMINALS VFD CHECKED
			TERMINALS IN CONTROL PANEL FOUND
↓		↓	LOOSE SENSOR WIRE ON TEMPERATURE CONTROL
4/[illegible]		[illegible]	CLEAN BURNER BLOWER MOTOR SILTON
4/20/94		DW	READJUSTED VALVE TRAVEL TIME

October 3, 1994

Letter regarding malfunction of Regenerative Thermal Oxidizer

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

October 3, 1994

RECEIVED
OCT - 6 1994
AIR & RADIATION
MANAGEMENT ADMINISTRATION

Maryland Department of the Environment
Air & Radiation Administration
2500 Broening Highway
Baltimore, MD 21224

Attention: Mr. Ross Oliver
Chemical Process Control Div - ARMA

Dear Mr. Oliver:

This letter is in reference to the malfunction of the Regenerative Thermal Oxidizer. This report follows the outline of COMAR 26.11.07.D.(2).

a. Installation - REECO Regenerative Thermal Oxidizer, Model WC-10, Serial #1162.

b. Nature of the emission - Volatile Organic Compound (VOC)

c. Time of the occurrence and duration: Wednesday, September 28, 1994 at 7:00 a.m.-6:30 p.m.

d. Excess emissions during the occurrence and calculations for formulation G97MR.

Day shift
Density of Formulation 7.59 lbs/gal
V.O.C. 5.20 lbs/gal
Total adhesive mix and solvent from the winders
Adhesive mix used 318.6 lbs
MEK used 55.5 lbs

Total gal used @ 7.59 lbs/gal = 41.97 gal
41.97 gal x 5.20 lbs/gal = 218.4 lbs V.O.C.

218.4 lbs
\+ 55.5
273.9 lbs V.O.C. for 8 hours

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 474-3100
FAX (301) 345-2367

Stone Industrial
Paramount Tube
Timms Spring
Michigan Spring

At 2.9 lbs/gal V.O.C. our emissions for this time frame would be:
41.97 gal x 2.9 lbs/gal = 121.71 lbs V.O.C.

```
      273.90
-     121.71
      152.19
```

Estimated excess emissions 152.19

Night shift
Total gal used @ 7.59 lbs/gal = 13.55 gal
13.55 x 5.20 lbs/gal = 70.46 lbs V.O.C.
Total MEK used = 49.3

```
      70.46
-     49.30
      119.76 lbs V.O.C. for night shift
```

$\frac{119.76}{10} =$ 11.97 lbs/hour V.O.C.

11.97 lbs/hour x 3 = 35.91 lbs V.O.C.
13.55 x 2.9 lbs/gal = 39.29 lbs V.O.C.

$\frac{39.29}{10} = 3.92$ lbs/hour

3.92 x 3 hours = 11.76 lbs

```
      35.91
-     11.76
      24.15 lbs
```

Estimated excess emissions for night shift is 24.15 lbs

```
      152.19
+      24.15
      176.34 total estimated emissions
```

e. Actual or probable cause of occurrence:

At approximately 5:00 a.m. an employee arrived and found the malfunction signal for the R.T.O. was operating. He tried several times to clear the malfunction and restart the R.T.O. He and another employee started to trouble shoot the chamber valve operating system. It was determined that a solenoid valve on one of the chamber valves had a crack and shorted out. This in turn prevented the chamber valves from sequencing.

f. Method of correcting:

A replacement assembly was located at DEES Hydraulic Co. in Baltimore. An employee was sent to pick up the unit immediately. This part was mounted to actuate the chamber valve. A full direct replacement assembly unit was ordered.

g. List of all occurrences of excess emissions:

(1) March 3, 1994; 9:00 a.m. - March 4, 1994 2:00 a.m.

Cause - Faulty Telmar Ramp Generator

(2) April 16, 1994; 8:30 a.m. - 11:45 a.m.

Cause - Power interruption due to severe storm and variable frequency drive system not energized.

(3) May 16, 1994; 5:20 p.m.-8:10 p.m.

Cause - Power interruption - relay and printed circuit board for purge valve actuator damaged

h. Copy of maintenance plan:

Enclosed

i. Documentation that the plan is being carried out:

Enclosed

j. Steps taken to/or planned to prevent the reoccurrence of excess emissions:

New solenoid/hydraulic cylinder assembly will be kept as spare part

Additional information pertaining to this report which we consider confidential is maintained in the support file.

Sincerely yours,

STONE INDUSTRIAL
Precision Products Group, Inc.

John H. Easto

John H. Easto
Chief Engineer

JHE:ses
Encls

STANDARD

Rev. 1 05/01/93

R-1019

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT

REECO

Regenerative Environmental Equipment Co., Inc.

STANDARD

R-1019

Rev. 1 05/01/93

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT
7/26/94	6-12AM	JW	REPLACED DEFECTIVE A-MA
			ACTUATOR
7/28/94	9AM	JW	ADDED 1/2GAL HYDRAULIC FLUID

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT
12/29/93		RE	REPLACED HYDRAULIC FILTER
4/1/94		DW	REPLACED #1 EXHAUST VALVE
			PROX SWITCH
4/1/94		JD	REPLACED RAMP GENERATOR
4/4/94		DW	REPLACED VFD AIR FILTERS
4/6/94		DW	GREESED INLET & EXHAUST VALVE ACTUATORS
			GREESED LOWER AUMA VALVE ACTUATORS
			GREESED MAIN BLOWER PILLOW BLOCKS
			CLEANED UV SCANNER LENS
			RETIGHTENED MAIN BLOWER ESTOP
			GREESED MAIN BLOWER MOTOR
			GREESED ROOF TOP AUMA ACTUATORS
			GREESED ROOF TOP FAN MOTOR
			RETIGHTED BELTS & APPLIED SOME
			BELT DRESSING
			REPLACED HYDRAULIC FILTER
			CLEANED TANK MESH FILTER
			REMOVED HYDRAULIC FLUID CLEANED
			TANK & REPLACED HYDRAULIC
			FLUID CHECKED & RETIGHTENED
			460 TERMINALS VFD CHECKED
			TERMINALS IN CONTROL PANEL FOUND
			LOOSE SENSOR WIRE ON TEMPERATURE CONTROL
4/1/94		[illegible]	CLEAN BURNER BLOWER MOTOR FILTER
4/1/94		DW	READJUSTED VALVE TRAVEL TIME

[illegible]

[illegible] BURNER FLAME OUTS
CONTINUE TO APPLY 8 AM
NONE OCCURRED THRU OUT
[illegible] DAY

9/[illegible]/94

Jack Clark from Recco was here to correct the problem on burner #1. He performed several tests and adjusted fuel and air to the burner, and found that the problem was from the signal from the scanner.

He guessed it could be from the noise from an SCR in the VFD or could be a bad coaxial cable (not positive about the results).

He recommended us connecting a scope to the input current and check for noise.

He also recommended connecting an ISOREG to the power supply to eliminate noise.

9/28/94

RTO went out @ 5:00 am with a valve failure on inlet # 3. Found a faulty solenoid which shorted the output module on the controller (BDAP209). Output # 00006.

While trouble shooting, we shorted output coils 00003, 00004, & 00005 on the output module. Replaced solenoid, reprogrammed controller and used outputs 00029, 00030 & 00031 instead of 00004, 00005, 00006 respectively.

Started RTO back up @ approx 5:30 pm 9/28/94

REV.	LOC.	DESCRIPTION	DATE	BY

HYDRAULIC FAULT	HIGH TEMP EXHAUST FAN CENTRAL CHAMBER	PROCESS ISOLATION	PURGE OR COMBUSTION AIR PRESSURE	FRESH AIR OR FUEL VALVE	FUEL PRESSURE FAULT	FLAME OUT	VALVE FAILURE	EXHAUST FAN HIGH VIBRATION	ANNUN-CIATOR
						✓	✓		

CHECK THOSE LIGHTS WHICH ARE ON AT TIME OF FAULT

DATE 09 28 94 TIME 05 00 00 AM/PM

INITIAL PLM

RE-START DATE _____ TIME _____ AM/PM

INITIAL _____

TOLERANCES-UOS			SCALE	
LINEAR	INCH	ANGULAR	MATERIAL	
X.XX	.010		QUANTITY	
X.XXX	.005		ASSEMBLY	

MACHINE & PART NAME R.T.O. FAULT RECORD

DRAWN BY	J.H.E.	7/27 93	R.T.O.-2
CHECKED			STONE INDUSTRIAL
APPROV.			

DOCUMENTATION ON THIS FORM MUST BE LEGIBLE , ACCURATE & UP-TO-DATE AT ALL TIMES

OPERATORS RECORD

OPERATOR

WINDER NO. 7

DAY

NIGHT 3259

DO NOT RUN MON. OR TUES

DATE	SHIFT	GLUE TYPE	GLUE START lbs	GLUE ADD lbs	GLUE END lbs	GLUE USED lbs	VISCOMETER JUG MEK START lbs	VISCOMETER JUG MEK ADD lbs	VISCOMETER JUG MEK END lbs	WASH MEK FRESH lbs	TOTAL MEK USED lbs
7/26	D										
	N	95 MR	36.5	8.5	25.0		7.0	7, 7, 3.5	6.5	20.5	
7/27	D										
	N	95 MR	32.3	18.5	25.3		7.0	3.5, 7.0, 4.5	6.0	21.5	
9/28	D		21.6	22.4	21.8		6.0				
	N		28.3	18	29.3		7.0	3.5, 3.5,	7.0	25.5	
9/29	D		24.1				3.0				
	N										
	D										
	N										
	D										

December 13, 1994

Letter regarding malfunction of Regenerative Thermal Oxidizer

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

December 13, 1994

Maryland Department of the Environment
Air & Radiation Administration
2500 Broening Highway
Baltimore, MD 21224

RECEIVED
DEC 14 1994
AIR & RADIATION MANAGEMENT

Attention: Mr. Ross Oliver
Chemical Process Control Div - ARMA

Dear Mr. Oliver:

This letter is in reference to the malfunction of the Regenerative Thermal Oxidizer. This report follows the outline of COMAR 26.11.07.D.(2).

a. Installation - REECO Regenerative Thermal Oxidizer, Model WC-10, Serial #1162.

b. Nature of the emission - Volatile Organic Compound (VOC)

c. Time of the occurrence and duration: Monday, December 5, 1994, 9:00 p.m.-11:30 p.m.

d. Excess emissions during the occurrence and calculations for formulation G97MR.

Density of Formulation 7.59 lb./gal
V.O.C. 5.20 lb./gal
Total adhesive mix and solvent from the winders
Adhesive mix used 133.5 lb.
MEK used 79.5 lb.

Total gal used @ 7.5 lb./gal = 17.59 gal
17.59 gal x 5.2 lb./gal = 91.46 lb. V.O.C.

91.46
79.50
170.96 lb. V.O.C. for 10 hours

$\frac{170.96}{10}$ = 17.1 lb./hr V.O.C.

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 220-4260
FAX (301) 345-2367

Stone Industrial
Paramount Tube
Timms Spring
Michigan Spring

At 2.5 x 17.1 = 42.75 lb. V.O.C. in 2.5 hours

V.O.C. allowed at 2.9 lb. /gal

17.59 gal x 2.9 lb./gal = 51.01 lb V.O.C.

$\frac{51.01}{10}$ = 5.1 lb./hr. V.O.C.

2.5 x 5.1 = 2.75 lb. V.O.C.

42.75
-12.75
30.00 lb. V.O.C. in excess emissions

e. Actual or probable cause of occurrence:

At approximately 9:00 p.m. on December 5, the R.T.O. malfunction alarm sounded. The evening supervisor tried to restart the unit but couldn't. He called the chief plant electrician for additional information and was then able to restart the unit. The approximate down-time for the R.T.O. was 2 1/2 hours. The problem was the air supply actuator motor assembly.

f. Method of correcting:

A replacement Honeywell actuator motor assembly, M740-A-1020 was located at a factory and sent express to us for replacement.

g. List of all occurrences:

(1) March 3, 1994; 9:00 a.m. - March 4, 1994 2:00 a.m.

Cause: Faulty Telmar Ramp Generator

(2) April 16, 1994; 8:30 a.m. - 11:45 a.m.

Cause - Power interruption due to severe storm and variable frequency drive system not energized.

(3) May 16, 1994; 5:20 p.m.-8:10 p.m.

Cause - Power interruption - relay and printed circuit board for purge valve actuator damaged

(4) September 28, 1994; 7:00 a.m. - 6:30 p.m.

Cause - Cracked solenoid valve on one of the chamber valves

h. Copy of maintenance plan:

Enclosed

i. Documentation that the plan is being carried out:

Enclosed

j. Steps taken to/or planned to prevent the reoccurrence of excess emissions:

The faulty actuator motor assembly will be sent out and rebuilt. This will be kept as a spare unit.

Additional information pertaining to this report which we consider confidential is maintained in the support file.

Sincerely yours,

STONE INDUSTRIAL
Precision Products Group, Inc.

John H. Easto

John H. Easto
Chief Engineer

JHE:ses
Encls

R-1019

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT
7/26/94	6-12AM	JW	REPLACED REFECTIVE AIR
			ACTUATOR
7/28/94	9AM	JW	ADDED 1/2GAL HYDRAULIC FLUID
11/4/94	3PM	JW VK	REPLACED PLC OUTPUT MODULE CLEANED VFD CABINET & RETIGHTENED CONN
11/8/94	11:30AM	JW	ADDED APPX 1/2GAL HYD. FLUID
11/28/94	3PM	JW	RETIGHTENED INLET & EXHAUST VALVE PILLAR
			BLOCK BEARING ASSEMBLY & SHAFT SETSCREWS
			GREASED INLET & EXHAUST VALVE FITTINGS
12/6/95	3PM	JW VK	REPLACED REFECTIVE AIR SUPPLY
			ACTUATOR MOTOR

12/6/94

Don Shumate called me.
At 11PM last night He could
not get the burners to
restart problem was He did
not move air supply damper
to complete low fire position
After He did reposition damper
burners refired unit was
off line appx 2hrs
When I arrived this morning
CCT was 1648 I shut burner
1 off bring temp down to
normal restart at 645AM
for normal operation
Also noted that run switch
would not drive damper to
higher fire position reposition
damper manually
Replace actuator motor
about 3-4PM

12/7/94

CCT 1444 Chart recordings
indicate temperature is normal

DOCUMENTATION ON THIS FORM MUST BE LEGIBLE , ACCURATE & UP-TO-DATE AT ALL TIMES

OPERATORS RECORD

OPERATOR

WINDER NO. 17

HT Elles

TE	SHIFT	GLUE TYPE	GLUE START lbs	GLUE ADD lbs	GLUE END lbs	GLUE USED lbs	VISCOMETER JUG MEK START lbs	VISCOMETER JUG MEK ADD lbs	VISCOMETER JUG MEK END lbs	WASH MEK FRESH lbs	TOTAL MEK USED lbs
	D										
15	N	95	25.7	19.5,	19.3	25.9	7.0	4.5	6	19.7	
	D										
16	N	95	25.0	25.5,	16.4		6.0	5.5	7	18.6	
	D										
	N										
	D										
	N										
	D										
	N										
	D										

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

PURCHASE ORDER NO: 011991
PAGE: 1
PO REV DATE: 12/07/94

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 474-3100
FAX (301) 345-2367
An Equal Opportunity Employer

PO REV:
ORIGINAL PO DATE: 12/07/94
CONTRACT NUMBER:
CONTACT: ATTN; JOANN CLARK 1-410-288-0560

VENDOR ID: 003320
JOBE AND COMPANY INC
CUST ACCOUNT NO 810068
7577 CANTON CENTER DR
BALTIMORE MD
21224-2028

SHIP TO:
STONE INDUSTRIAL INC
9207 51ST AVE
COLLEGE PARK MD
20740-1910 USA

TRANSPORT VIA: U.P.S.
FOB POINT: ORIGIN
PAYMENT TERMS: NET 30 DAYS

TAX EXEMPT NUMBER: 04999895

LN#	ITEM/ DESCRIPTION	UM	REV	ORDER QUANTITY	BALANCE DUE	PROMISED DOCK	UNIT PRICE	EXTENDED PRICE	T X
001	REPAIR REPAIR HONEYWELL ACTUATOR MOTOR	EA		1	1	12/21/94	.00	.00	N

#M740A1020 PROBLEM; MOTOR WOULD ONLY DRIVE IN ONE DIRECTION. NOTE: PLEASE ADVISE OF ESTIMATE TO REPAIR BEFORE PROCEEDING.** CHG: 16606750013

AUTHORIZED BY: Paul Mills
BUYER: PLD

TOTAL EXTENDED AMOUNT THIS PURCHASE ORDER: .00

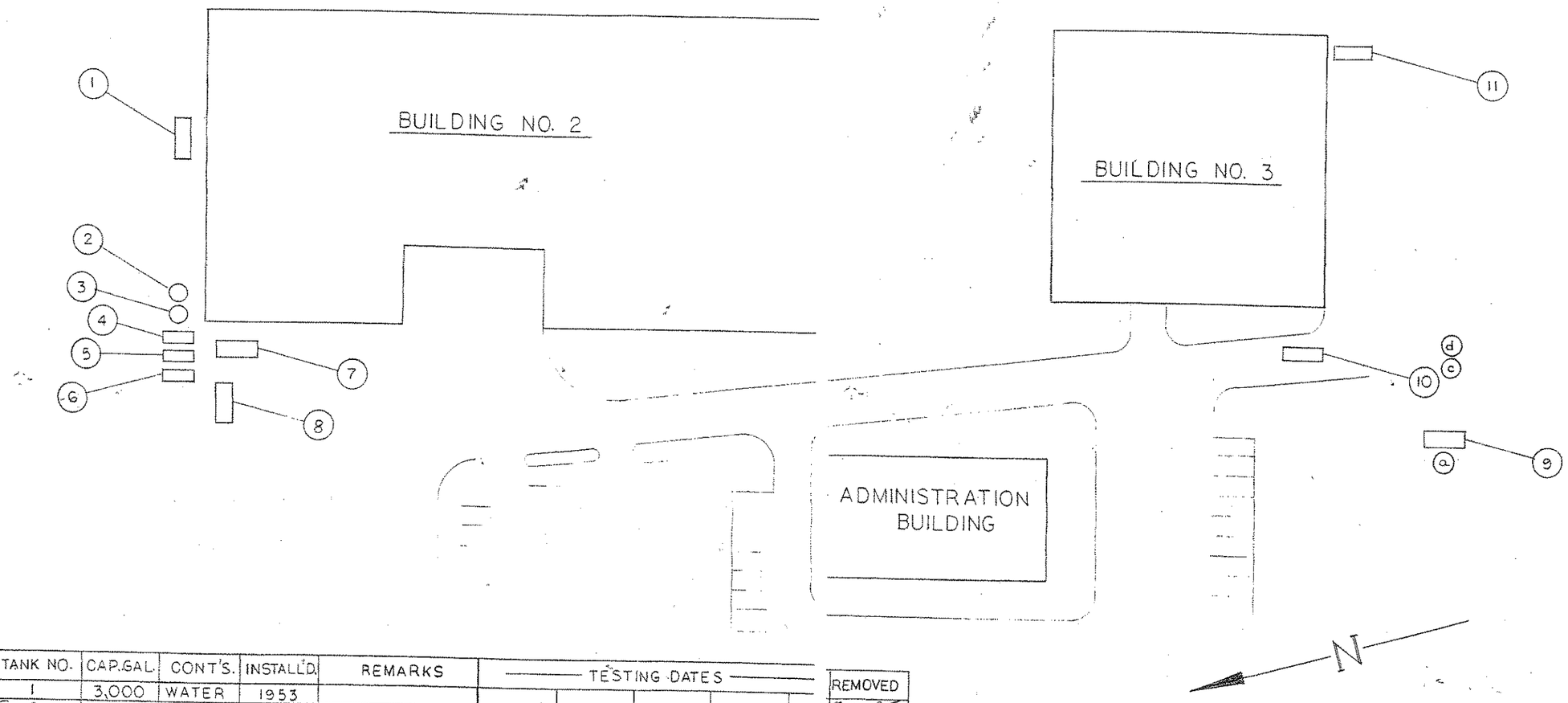
1995

Updated Site Layout Plan

REV.	LOC.	DESCRIPTION & E.C.NO.	DATE	BY
e		TANKS REMOVED BY STONE & HOOVER	9/22/89	JHE
		CONTRACTING, LORTON VA		
f		TANKS REMOVED BY TRI COUNTY INC,	9/22/92	JHE
		BELTSVILLE, MD.		

REV.	LOC.	DESCRIPTION	DATE	BY
a	2A	REMOVED FROM SERVICE & DISMANTLED	6-1-85	
b	1C	CHART REFORMATED	1-19-88	MC
c	2A	TESTED 2-10-88 BY PETRO SUPPLY CO. INC. SILVER SPRING, Md.		

d 2A BOILER CONVERTED TO GAS TANK REMOVED BY STONE & HOOVER CONTRACTING, LORTON, VA. 7-29-88/MC



TANK NO.	CAP.GAL.	CONT'S.	INSTALL'D.	REMARKS	TESTING DATES					REMOVED
1	3,000	WATER	1953							8-30-85
(e) 2	750	M.E.K.	1963							9-21-89
(e) 3	750	M.E.K.	1963							"
(e) 4	1,500	ISO AL.	1970	Leaking < All Piping Disconnected	4-18-86					"
(e) 5	1,500	ISO AL.	1970	O.K.	4-18-86					"
(e) 6	1,500	ISO AL.	1970	O.K.	4-18-86					"
(f) 7	10,000	2 OIL	1975							9/22/92
(f) 8	8,000	WATER	1982							"
(a) 9	10,000	2 OIL	1974	Scrapped	6-1-85					6-1-85
(d) 10	4,000	2 OIL	1954	Tested - OK	2-10-88					7-28/29-88
(e) 11	1,500	M.E.K.	1970							9-21-89

TOLERANCES			
LINEAR	INCH	mm	ANGULAR
X.X		±	± —
X.XX	± —	± —	
X.XXX	± —		
UNLESS OTHERWISE SPECIFIED			

SCALE	NONE	MACHINE & PART NAME	BRANCHVILLE TANK LOCATIONS
MATERIAL			
NO. REQ'D.			
ASSEMBLY			

DRAWN BY	TORRE	12-1-83
CHECKED		
APPROV.		

BLD-239

STONE INDUSTRIAL DIV.
J. L. Clark Manufacturing Co.

April 28, 1995

Letter regarding malfunction of Regenerative Thermal Oxidizer

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

April 28, 1995

RECEIVED
[redacted]
AIR & RADIATION
MANAGEMENT ADMINISTRATION

Maryland Department of Environment
Air & Radiation Administration
2500 Broening Highway
Baltimore, MD 21224

Attention: Mr. Ross Oliver

Dear Ross:

This letter is in reference to the malfunctioning of the Regenerative Thermal Oxidizer. This report follows the outline of COMAR 26.11.07.D.(2)

a) Installation - REECO Regenerative Thermal Oxidizer, Model WC-10, Serial #1162

b) Nature of the emission - Volatile Organic Compound (V.O.C)

c) Time of occurrence and duration, Monday, April 24, 1995, 6:30 PM - Tuesday (4/25), 5:40 p.r
23+ hours

d) Excess emissions during occurrence and calculations for formulation G97MR
Density of formulation 7.59 lb./gal
V.O.C. 5.20 lb/gal
Total adhesive mix and solvent used at the winders
Adhesive mix
MEK

Monday - 24th Night Shift

Total gal used @ 7.59 lb/gal = 36.14 gal
36.14 gal x 5.2 lb/gal = 187.92 lb V.O.C.

Total adhesive used 274.3 lb

$$\frac{274.3 \text{ lb}}{7.59 \text{ lb/gal}} = 36.14 \text{ gal}$$

36.14 x 5.20 lb/gal = 187.92 lb V.O.C. in glue

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 474-3100
FAX (301) 345-2367

Stone Industrial
Paramount Tube
Timms Spring
Michigan Spring

187.92
60.00 lb MEK from viscometers
247.92 lb V.O.C. for 10 hours

$\frac{247.92}{10} =$ 24.79 lb/hr

24.7 x 7.5 hours = 185.92 lb. V.O.C.

V.O.C. allowed at 2.9 lb/gal

36.14 x 2.9 = 104.8 lb

$\frac{104.8}{10}$ = 10.5 lb/hr

10.5 x 7.5 = 78.75 lb V.O.C.

185.92
-78.75
107.17 V.O.C. in excess emissions

Tuesday, 25th Day Shift

Total adhesive used = 293.3 lb

$\frac{293.3 \text{ lb}}{7.59 \text{ lb/gal}}$ = 38.6 gal

38.6 x 5.20 lb/gal (V.O.C.) = 200.7 lb. V.O.C. in glue

$\boxed{200.7}$

76.0 lb MEK from viscometers
276.7 lb V.O.C. for day shift

Tuesday - 25th Night Shift

Total adhesive used = 317.2 lb

317.2 lb = 41.79 gal glue used
7.59 lb/gal

41.79 x 5.20 lb/gal (V.O.C.) = 217.3 lb V.O.C. in glue

217.3

+71.5 lb MEK from Viscometers
288.8 lb V.O.C. for 10 hour shift

RTO back on line @ 5:40 PM (2 hrs. of night shift)
or 20% of V.O.C. were emitted to atmosphere
288.8 x .2 = 57.76 lb V.O.C. emitted

276.7 lb V.O.C. (day shift) + 57.76 lb V.O.C. (night) = 334.46 total V.O.C.

V.O.C. allowed at 2.9 #/gal

Day Shift 38.6 gal x 2.9 #/gal = 111.9 lb V.O.C. allowed

276.7 lb V.O.C.
-111.9 lb V.O.C. allowed
164.8 lb V.O.C. in excess emissions

Night Shift 41.79 gal x 0.2 (20% of night shift) = 8.36 gal used

8.36 gal x 2.9 lb/gal = 24.2 lb V.O.C. allowed

57.76 lb V.O.C. emitted
-24.2 lb V.O.C. allowed
33.56 lb V.O.C. in excess emissions

Tuesday Excess = 164.8 + 33.56= 198.36 lb excess V.O.C.

Total malfunction emissions in excess

107.17 (24th night) 164.8 (25th day) _ 33.56 (25th night) = 305.53 lb
Excess emissions

e) Actual or probable cause of occurrence:

At approximately 6:30 PM on April 24, the R.T.O. malfunction alarm sounded. The night supervisor tried to restart the unit, but could not. He called the chief plant electrician. The chief plant electrician worked on the control for approximately 2 hours. The problem turned out to be a short in the suppresser board for the V.F.D. (variable frequency drive) i.e., main blower. Two of the three fuses for this circuit were also blown. In the discussion with the manufacturer of the unit, Robicon, they felt that the cause may have been a voltage spike.

f) Method of correcting:

The manufacturer of the unit was contacted and the parts were in stock. A technician with parts flew from Pittsburgh. He checked out the parts and circuit and installed new components. The unit was operational at 5:40 PM, April 25, 1995. Those damaged components which can be repaired will be kept as spare parts.

g) List of occurrences:

1) March 3, 1994, 9:00 am - March 4, 1994, 2:00 am

   Cause: faulty Telmar Ramp Generator

2) April 16, 1994, 8:30 am - 11:45 am

   Cause: Power interruption due to severe storm and variable frequency drive system not energized.

3) May 16, 1994, 5:20 PM - 8:10 PM

   Cause: Power interruption - relay and printed circuit board for purge valve actuator damaged.

4) September 28, 1994, 7:00 am - 6:30 PM

   Cause: Cracked solenoid valve on one of the chamber valves.

5) December 5, 1994, 9:00 PM - 11:30 PM

   Cause: Malfunction of the supply actuator motor assembly

h) Copy of Maintenance plan:

   Enclosed

i) Documentation that the plan is being carried out

   Enclosed

j) Steps taken to/or planned to prevent the reoccurrence of excess emissions. The damaged components will be repaired and will become spare parts.

Additional information pertaining to this report which we consider confidential is maintained in the support file.

Sincerely yours,

STONE INDUSTRIAL
Precision Products Group Inc

Joseph A. Di Silvio
Engineering and Quality Assurance Manager

JAD:ses
Encls

STANDARD

R-1019

RE-THERM Service Log

Regenerative Environmental Equipment Co., Inc.

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT

REECO

STANDARD

R-1019

Rev. 1 05/01/93

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT
7/26/94	6-12AM	JW	REPLACED DEFECTIVE A-MA
			ACTUATOR
7/28/94	9AM	JW	ADDED 1/2GAL HYDRAULIC FLUID
11/4/94	3PM	JW VK	REPLACED PLC OUTPUT MODULE CLEANED VFD CABINET & RETIGHTENED CONNECTS
11/8/94	1130AM	JW	ADDED APPX 1/2GAL HYD. FLUID
11/28/94	3PM	JW	RETIGHTENED INLET & EXHAUST VALVE PILLAR
			BLOCK BEARING ASSEMBLY & SHAFT SETSCREWS
			GREASED INLET & EXHAUST VALVE FITTINGS
12/6/94	3PM	JW JD VK	REPLACED [illegible] MAIN SUPPLY
			ACTUATOR MOTOR
1/17/95	3PM	JW	ADDED APX 1GAL HYDRAULIC FLUID
			CLEAN BURNER MOTOR AIR FILTER
1/31/95	3PM	JW	GREASED MAIN BLOWER & PILLAR BLOCKS
4/12/95	8AM	JW	RETIGHTENED VALVE ACTUATOR SHAFT SETSCREWS
4/15/95	8AM 3PM	RE DM GG	REPLACED PILLAR BLOCK BEARING & STEEL
			FLEX COUPLING GRID GREASED BEARING
			& PACKED COUPLING
4/24/95	330-530 PM	JW MS	REPLACE DEFECT CIRCUIT BOARD &
			2 OPEN FUSES

4-15-95 Plant Shut down - Easter Weekend.
Remove & Replace shaft bearings on Chicago Blower
Replace Steelflex Coupling grid, & reline motor.
Ronnie, Greg & Dennis.
We also check for High Speed run & Vibration
All check OK - R. Evans.

4-20-95 10:00 - Flame out - Plant Power loss
Re Start within 30 sec, By Venky.

4/24/95

6:45 PM Received Phone CALL
AT Home From Don Shumate
RTO DOWN AND They were unable
TO RESTART I LEFT Home RIGHT
AWAY AFTER checking UNIT
I FOUND VFD MAIN BLOWER
DRIVE HAD 2 SHORTED MAIN
SEMICONDUCTOR FUSE PROTECTORS
HAD OPENED DUE TO
OVER CURRENT PROBLEM
ALSO FOUND SUPPRESSOR
CARD HAD SHORTED
LANDS PROBABLY CAUSING
FUSES TO OPEN

4/25/95

CALLED ROBICON (VFD MFG)
NEW SUPPRESSOR CARD

IS IN STOCK SERVICE
REP FROM ROBICON IS FLYING
HERE TODAY WITH NEW PARTS
TO be INSTALLED AND TO
ENSURE THAT There ARE
NO OTHER PROBLEMS

11:45 AM PAPER JAMMED
REPLACED WITH NEW CHART PAPER
IT WAS VERY CLOSE TO END
MIKE SLAUIN (ROBICON REP) ARRIVED
AT 3:30 PM INSTALLED NEW
CIRCUIT BOARD & FUSES
RTO WAS BACK IN OPERATION
AT 5:40 PM

4/26/95 check RTO AT 6:30 AM
EVERYTHING OPERATING
CORRECTLY

DOCUMATION ON THIS FORM MUST BE LEGIBLE , ACCURATE ,& UP-TO-DATE AT ALL TIMES

OPERATORS RECORD

OPERATOR DAY Ann NIGHT _____ WINDER NO. 21

DATE	SHIFT	GLUE TYPE	GLUE START lbs	GLUE ADD lbs	GLUE END lbs	GLUE USED lbs	VISCOMETER JUG START lbs	MEK ADD lbs	END lbs	TOTAL MEK USED lbs	WASH MEK FRESH lbs
4/24/95	MONDAY D	97	33.5	32.9			7.0	7.0	7.0		
4/24	N	57	26.6	25.4	21.7		7.0	7.0	7.0		18.6
4/25/95	TUESDAY D	97	30.4	30.2 31.7			7.0	5.0, 6.0	6.5		
4/25	N	57	27.6	28.4	18.5		7.0	7.0 4.5	6.0		18.9
4/26/95	WEDNESDAY D	97	31.6	31.2			7.0	7.0, 3.5	6.0		
4/26/95	N	57	28.4	25.7 20.2	23.4		7.0	7.0, 5.5	5.0		18.8
4/27/95	THURSDAY D	97	30.6	28.9			7.0				
	N										17.8
	FRIDAY D										
	N										
	SATURDAY D										

May 22, 1996

Letter regarding malfunction of Regenerative Thermal Oxidizer

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

RECEIVED
MAY 29 1996
AIR & RADIATION
MANAGEMENT ADMINISTRATION

May 22, 1996

Maryland Department of the Environment
Air & Radiation Administration
2500 Broening Highway
Baltimore MD 21224

Attention: Ross Oliver

Dear Ross:

This letter is in reference to the malfunction of the Regenerative thermal Oxidizer. This report follows the outline of COMAR 26.11.07.D(2)

a) Installation - REECO Regenerative thermal Oxidizer Model WC-10, Serial #1162

b) Nature of Emission - Volatile Organic Compound (V.O.C.)

c) Time of occurrence - Tuesday, May 14, 1996; 9:30 a.m.

d) Excess emissions during occurrence and calculations for formulation G97

Density of formulation 7.59 lb/gal
V.O.C. 5.20 lb/gal
Total adhesive mix and solvent used at the winders
Adhesive mix 301.0 lb
MEK - 40 lb

301 lb ÷ 7.59 lb/gal = 39.7 gal
39.7 gal x 5.20 (lb V.O.C./gal)= 206.2 lb V.O.C. in glue

206.2 lb V.O.C. in glue
40 lb of MEK
246.2

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 474-3100
FAX (301) 345-2367

Stone Industrial
Paramount Tube
Timms Spring
Michigan Spring

246.2 (lb V.O.C.) ÷ 8 (hrs) = 30.8 lb/hr
30.8 (lb/hr) x 4.5 (hrs) = 138.6
39.7 gal x 2.9 lb/gal = 115.13 lb V.O.C.
115.13 ÷ 8 = 14.39 lb/hr
14.39 lb/hr x 4.5 hrs = 64.76 lb

138.60
- 64.76
73.84 V.O.C. in excess emissions

e) Actual or probably cause of occurrence: At approximately 1:20 p.m. oven #563 would not start. The operator called the Chief Plant Electrician. He discovered that the Regenerative thermal Oxidizer control panel power was off. The main control fuse was open. As a result of this open fuse there was no power to the Fault Alarm or lights. The fuse was replaced and the R.T.O. was back on line at 2:15 p.m.

f) Method of Correction

1) Warning lights will be relocated closer to supervisor's desk
2) A sensor, independent of R.T.O. control circuit will be installed. This will indicate the position of the roof top valve - to atmosphere or to R.T.O.

g) List of Occurrences

1) March 3, 1994, 9:00 a.m., March 4, 1994, 2: 00 a.m.
Cause: Faulty Telmar Ramp Generator

2) April 16, 1994, 8:30 a.m. - 11:45 a.m.
Cause: Power interruption due to severe storm and variable frequency drive system not energized

3) May 16, 1994, 5:20 p.m. - 8:10 p.m.
Cause: Power interruption - relay & printed circuit board for purge valve actuator damaged

4) September 28, 1994; 7:00 a.m. - 6:30 p.m.
Cause: Cracked solenoid valve on one of the chamber valves

5) December 5, 1994, 9:00 p.m. - 11:30 p.m.
Cause: Malfunction of the supply motor assembly

6) April 24, 1995 - 6:30 p.m.
Cause: Short in the suppresser board for the V.F.D. (Variable Frequency Drive) i.e., main blower

h) Copy of maintenance plan: Enclosed
i) Documentation that the plan is being carried out: Enclosed

Sincerely yours,

STONE INDUSTRIAL
Precision Products Group, Inc.

John H. Easto

John H. Easto
Chief Engineer

JHE:ses
Encls

Regenerative Environmental Equipment Co., Inc.

RE-THERM Service Log

DATE	TIME	INITIALS	SERVICE PERFORMED/COMMENT
9/3/95	6AM TO 12PM	DW RE	CLEAN VFD CONTROL CABINET &
			RETIGHTENED CONNECTIONS VISUALLY
			INSPECTED OVERALL UNIT REPLACED
			AIR FILTERS RELOCATED EXHAUST
			VALVE PROX SWITCHES REPLACE
			#2 EXHAUST VALVE PROX SWITCH
			CLEANED COMBUSTION BLOWER MOTOR
			FILTER & HOUSING GREASED ALL
			RTO BOTTOM LEVEL FITTINGS
			GREASED LARGE BLOWER MOTOR
			FITTINGS REPLACED ROOF TOP
			BLOWER MOTOR BELTS RETIGHTENED
9/3/95	12 Noon	DW RE	INLET & EXHAUST VALVE SETSCREWS
9/3/95		DW RE	REPLACED HYDRAULIC FILTER ADD NEW FLUID
12/27/95		DW RE GG	CLEANED & RETIGHTENED VFD
			GREASED MAIN BLOWER COUPLINGS
			BEARINGS REPLACED HI PRESSURE
12/27/95			HYDRAULIC SWITCH READJUSTED
12/27/96		RE	REPLACED HYDRAULIC FILTER
5/13/96	5AM TO 7AM	DW RE	CHECK & TIGHTENED BELTS ROOF
			TOP BLOWER GREASED
			MAIN BLOWER CLEANED VFD
			RETIGHTENED CONNECTIONS PLUS
5/13/96			VISUAL INSPECTION

4/25/96
VISUAL check 7AM

4/26/96
VISUAL Check 7AM

4/29/96
VISUAL Check 7AM
VISUAL Check 10:20 AM
VISUAL check 1:45 PM

4/30/96
VISUAL Check 7AM
2:05 PM MOMENTARY POWER FAILURE
RESTARTED OK

5/1/96
VISUAL Check 6AM
VISUAL Check 3PM

5/2/96
VISUAL Check 6AM

5/3/96
VISUAL Check 6AM

5/6/96
VISUAL Check 6AM

5/7/96
VISUAL CHECK 6 AM

5/8/96
VISUAL CHECK 6 AM
VISUAL CHECK 150 PM

5/9/96
VISUAL CHECK 6 AM
VISUAL CHECK 230 PM

5/10/96
VISUAL CHECK 6 AM
REPLACED CHART PAPER 730 AM
VISUAL CHECK 1245 PM

5/13/96
PERFORMED PREVENTIVE MAINTENANCE
UNIT WAS BACK ON LINE 705 AM
NOTICED AT TIMES A FEW DOWNWARD
DIPS IN TEMPERATURE TO: ABOUT
1375 FOR A VERY SHORT DURATION IN
TIME ORDERED A NEW CONTROL
CHAMBER TEMPERATURE CONTROL

5/14/96
VISUAL CHECK 6 AM
CURING OVEN 563 WOULD NOT
START APPX 120 PM FOUND

May 2, 1997

Letter regarding previous removal of USTs

6-009994
8-1739 PG
93-0560-PG

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION

May 2, 1997

3-010612 PG

RECEIVED
MAY 6
OIL CONTROL PROGRAM

Maryland Department of the Environment
Cynthia Keller, Chief
Office of Resource Management
Oil Control Program
2500 Broening Highway
Baltimore, MD 21224

Ms. Keller,

The 5 tanks listed on your print-out of underground storage tanks were removed on or about 9/21/89. We no longer have any underground storage tanks at this site.

Sincerely,

STONE INDUSTRIAL
Precision Products Group, Inc.

John H. Easto

John H. Easto
Chief Engineer

JHE:djd

9207 51st Avenue
College Park, Maryland 20740-1910
(301) 474-3100
FAX (301) 345-2367

Stone Industrial
Paramount Tube
Timms Spring
Michigan Spring

June 15, 1999

Letter regarding Permit to Construct Four Spiral Tube Winders

MDE

MARYLAND DEPARTMENT OF THE ENVIRONMENT

2500 Broening Highway • Baltimore Maryland 21224
(410) 631- 3000 • 1- 800 -633-6101 • http:// www. mde. state. md. us

Parris N. Glendening
Governor

Jane T. Nishida
Secretary

JUN 15 1999

Mr. John H. Easto
Chief Engineer
Stone Industrial, Precision Products Group, Inc.
9207 51st Avenue
College Park MD 20740-1910

Dear Mr. Easto:

This letter is to inform you that the Air and Radiation Management Administration (ARMA) received your Permit to Construct application for the installation of Four Spiral Tube Winders on May 19, 1999.

Enclosed is a payment transmittal for the $ 1,200 application fee to replace the transmittal #5428 TR which was sent to you on May 24, 1999. Please pay the fee as soon as possible in order to avoid delays in the permitting process.

After a preliminary review of your application, the Department has determined that the application is incomplete and further information must be submitted before the review can proceed. Please submit the demonstration of compliance with the Ambient Impact Requirement under Toxic Air Pollutant (TAP) Regulations (COMAR 26.11.15.06).

Based on the nature of your proposed installation, your application is required to undergo public review. State statutes impose certain responsibilities on applicants filing an application for an installation that is subject to review by the general public. A brief outline of the permitting process is attached.

Each notice required during the permit process must be published at least once a week for two consecutive weeks in the legal section of a daily or weekly newspaper of general circulation in the geographical area in which the proposed installation will be located. All notices will be prepared by the Department and will be sent to you. It is your responsibility to publish the notices and to pay all incurred expenses.

Finally, it is your responsibility to actively participate in any public meetings or hearings associated with the permit application. Failure to participate may delay the permit issuance process.

If you have further questions, feel free to contact me at (410) 631-3230.

Sincerely,

Calvin Chen
Air Quality Permits Program
Air and Radiation Management Administration

CC/ckc

Enclosure

cc: Prince George's County Health Department

MARYLAND DEPARTMENT OF THE ENVIRONMENT

AIR AND RADIATION MANAGEMENT ADMINISTRATION

SUMMARY OF THE PUBLIC PARTICIPATION REQUIREMENTS DURING THE PERMIT TO CONSTRUCT REVIEW PROCESS

I. INFORMATIONAL MEETING

An informational meeting provides an opportunity for communication between the company, the Department, and citizens. This meeting may or may not be held depending upon the level of public interest in the application.

II. TECHNICAL REVIEW OF THE APPLICATION

The Department performs a technical review of the application to determine if the proposed equipment will comply with all applicable air pollution control regulations.

III. TENTATIVE DETERMINATION

After the technical review and the informational meeting, if one is held, the Department prepares a tentative determination which will include a proposal to either issue or deny the permit. A copy of the tentative determination will be available for review by citizens.

IV. PUBLIC HEARING

Citizens must be given the opportunity to request a public hearing. If a hearing is requested or if the Department decides to require one, the Department will schedule the hearing, which serves as a way to formally receive comments from citizens on the tentative determination. Written comments about the tentative determination can also be sent directly to the Department.

V. FINAL DETERMINATION

If adverse written and/or oral comments are received concerning the tentative determination or if the Department intends to make a final determination that is substantively different from the tentative determination, the Department responds in writing to the comments received and prepares a final determination. The final determination will, as in the tentative determination, include a proposal either to issue or to deny the permit.

VI. OPPORTUNITY TO REQUEST A CONTESTED CASE HEARING

If a final determination is required, the public must be given the opportunity to request a contested case hearing. This hearing is an adjudicatory hearing before an administrative law judge. If a contested case hearing is held, the administrative law judge recommends a decision to the Department after the hearing or issues a summary decision. The Department then makes a final decision to issue or to deny the permit.

PAYMENT TRANSMITTAL
PERMIT TO CONSTRUCT APPLICATION
TRANSMITTAL #5428 TR

(X) Construction ( ) Modification

Payer: Stone Industrial, Precision Prod.
9207 51st Avenue
College Park MD 20740-1910
Attn: Mr. Timothy E. Kartisek
VP & Gen. Mgr.

Source Description: Modification of the existing Mylar Winders line by adding four Spiral Tube Winders venting through the existing thermal Oxidizer. (This payment Transmittal is to replace the previous Transmittal #5428 TR).

Site: Same

Fee: $1,200.00

Please:

Make your check payable to **Department of the Environment/Clean Air Fund.**

IMPORTANT: Mail check with this transmittal form to:

Maryland Department of the Environment
P.O. Box 2037
Baltimore, Maryland 21203-2037

WE MUST HAVE THIS TRANSMITTAL FORM IN ORDER TO APPLY YOUR FEE TO THE PROPER ACCOUNT

FOR MDE USE ONLY
Source Code: 02.61.09
Project: 3706
Receipt No.: _____
Receipt Date: _____

*****THIS IS NOT A PERMIT*****

cc: Mr. Cheng Chen
June 14, 1999

Please insert your Federal I.D. Number or Social Security Number: _____

Please return one copy of the transmittal with your remittance

STONE INDUSTRIAL
PRECISION PRODUCTS GROUP, INC.

May 13, 1999

RECEIVED
MAY 18 1999
AIR & RADIATION
MANAGEMENT ADMINISTRATION

Maryland Department of the Environment
Air and Radiation Management Administration
2500 Broening Highway
Baltimore, MD 21224

Attention: Mr. Andrew Grenzer

Dear Mr. Grenzer:

Enclosed please find 2 copies of the Air Toxics Segment of our Emission Certification Report. The calculations are for:

Tolvene
Formaldehyde
MDI (Methylene Diphenyl Diisocyanate)

Sincerely,

John H Easto

John Easto
Chief Engineer

JHE:ssl
Encls

9207 51st Avenue
College Park, Maryland
20740-1910

Tel (301) 474-3100
Fax (301) 345-2367
www.stoneindustrial.com

MARYLAND DEPARTMENT OF THE ENVIRONMENT
[illegible] Broening Highway • Baltimore Mary[illegible] 21224
(410) 631-3000 • 1-800-633-6101 • http://www.mde.state.md.us
Air and Radiation Management Administration
Air Quality Compliance Program
(410) 631-3220

AIR TOXICS

EMISSION CERTIFICATION REPORT

Report for Calendar Year 1998

A. PREMISE INDENTIFICATION	Do Not Write in This Space
Company Name STONE INDUSTRIAL	Date Received Local
Address 9207 51st Ave	Date Received State
City College Pk. County P.G. Zip Code 21740	AIRS Code
B. Briefly Describe the Major Function of the Premises	FINDS Code
Manufacturer of custom spiral wound and extruded tubing	SIC Code
	Premises Number
	Source Latitude and Longitude
	Reviewed Name Date

I am familiar with the premises and the installations and sources for which this report is submitted. I have personally examined the information in this report, which consists of 4 pages (including attachments), and certify that the information is correct to the best of my knowledge.

Timothy E. Kartisek , V.P. & Gen. Mgr. 5/17/99
Name (Print/type) Title Date

Timothy E. Kartisek (301) 220-4260
Signature Telephone Number

Form Number
11/13/98
TTY Users

54 Maryland Priority Air Pollutants

Pollutant	Lbs./hour	Tons/year
Acetaldehyde		
Acrolein		
Acrylamide		
Acrylonitrile		
Arsenic & compounds		
Benzene		
Benzyl chloride		
Beryllium & compounds		
Bis(2-ethylhexl)phthalate		
1,3-Butadiene		
Cadmium & compounds		
Carbon tetrachloride		
Chlordane		
Chlorine		
Chloroform		
Chromium & compounds		
Coke oven emissions		
Copper		
1,2-Dibromoethane		
1,4-Dichlorobenzene(P)		
1,2-Dichloropropane		
1,3-Dichloropropene		
Dieldrin		
1,4-dioxane		
Ethyl acrylate		
Ethylene dichloride		
Ethylene oxide		
Ethylidene dichloride		
Formaldehyde	.01	0.00
Glycol ethers		
Hexachlorobenzene		
Hexachlorocyclopentadiene		
Hydrazine		
Hydrochloric acid		
Lead & compounds		
Maleic anhydride		
Manganese & compounds		
Mercury & compounds		
Methyl bromide		
Methyl chloride		
Methylene chloride		

Stone Industrial
Air Toxics Calculations

7695 – 151,008 lbs

151,008 x .205 (Tolvene content) = 30956.64 lbs

30956.64 x .97 (efficiency of RTO) = 30027.94 lbs

30956.64 – 30027.94 = 928.70 lbs

928.70 ÷ 2000 = .46 tons / year

928.70 ÷ 286 days = 3.25 lbs / day

3.25 ÷ 16 = .20 lbs / hour

5190 - 12,000 lbs

12,000 lbs x .025 (Formaldehyde content) = 300 lbs

300 lbs x .97 (efficiency of RTO) = 291 lbs

300 lbs – 291 lbs = 9 lbs

9 lbs ÷ 2000 = 0.00 tons

9 lbs ÷ 248 days = 0.04 lbs / day

0.04 ÷ 8 = 0.01 lbs / hour

Stone Industrial
Air Toxics Calculations (continued)

MR - 9900 lbs

9900 lbs x .45 (MDI content) = 4455 lbs

4455lbs x .97 (efficiency of RTO) = 4321.35 lbs

4455lbs – 4321.35 = 133.65 lbs

133.65 lbs ÷ 2000 = .067 tons

133.65lbs ÷ 286 days = .467 lbs / day

.467 ÷ 16 = .03 lbs / hour

December 13, 1999

Letter regarding Emission Certification for 1999

16-00429

MDE

MARYLAND DEPARTMENT OF THE ENVIRONMENT

2500 Broening Highway • Baltimore Maryland 21224
(410) 631- 3000 • 1- 800 -633-6101 • http:// www. mde. state. md. us

Parris N. Glendening
Governor

Jane T. Nishida
Secretary

December 13, 1999

Mr. John Easto
Chief Engineer
Stone Industrial Division
51st Avenue and Cree Lane
College Park md 20740

Dear Mr. Easto:

Subject: Emission Certification Due April 1, 2000

This year the Department, in addition to the annual emission certification, is requiring the emission certification of ***192 air toxics***.

Emission Certification

As in previous years, you are required by Maryland air pollution control regulations to certify your air emissions for the past calendar year. The air pollutants to be certified are particulate matter (PM10 or total), sulfur oxides, nitrogen oxides, carbon monoxide, and volatile organic compounds (VOCs) for the calendar year 1999.

Copies of the appropriate certification forms are enclosed. Each pollutant should be reported on a separate page that shows the emissions of that pollutant from each source registered at the facility. Therefore, you will need to make four copies of Page 2, Emissions Certification Report (See Instructions II, attached).

Calculations supporting the emission numbers reported on the certification forms should be included with your submittal. If AP-42 factors are used to determine emissions, then the most recent factors should be used. AP-42 factors can be found at www.epa.gov/ttn/chief. Records, such as production logs, purchase orders, gas bills and the like, that substantiate the numbers used in the calculations should be maintained on site and made available to your inspector upon request.

Please be reminded that, you must include with your certification a statement indicating the compliance status of your facility with regard to Maryland's Air Toxic Regulations (COMAR 26.11.15) for the past calendar year as required by your operating permit. The emissions certification is due by April 1, 2000.

Air Toxic Emissions Certification

This year the Department is requiring additional air toxic emission data for the following reasons:

1. The EPA has recently committed to developing air toxics emission inventories;
2. The information in the inventories will aid EPA in defining the extent of air toxics problems in the United States; and,
3. The information will also be used to develop emission standards for both major and area sources and to give better direction to certain EPA programs, such as the Urban Air Toxics Strategy and the Residual Risk Program.

From a state perspective, an updated air toxics inventory is necessary to quantify long-term reductions that have occurred since the State Air Toxics program began in 1988. From a local perspective, information on air toxics is important to communities because it provides them with a sense of what is occurring at the local level. This is an issue that is becoming more and more crucial.

Considering that existing data on air toxics is less than comprehensive, we believe it is in the best interest of all concerned to provide EPA with current and reliable information on air toxics while simultaneously updating our existing State Air Toxics inventory. Therefore, pursuant to COMAR 26.11.01.04 and .05, we request, in addition to the pollutants currently being reported, that you report on emissions of the air toxics listed on the attached sheet labeled "Toxic Air Pollutants for 1999 Maryland Toxics Inventory."

This new report will become the Air Toxics segment of your Emission Certification Report. Each toxic pollutant shall be identified on a separate page and quantified by registration numbers.

Please include the calculations supporting your air toxics emissions. This air toxics information is not required for fuel burning equipment. Please submit two copies of the completed forms and air toxics information to the following address:

Maryland Department of the Environment
Air and Radiation Management Administration
2500 Broening Highway
Baltimore, Maryland 21224
Attention: Ervan Boone

Should you have any questions or require assistance completing this certification, please call your compliance inspector at (410) 631-3231.

Sincerely,

Ralph Hall

Ralph Hall, Chief
Combustion and Metallurgical Division
Air and Radiation Management Administration

RH/jc

Enclosures

cc: Prince George's County Health Department

August 3, 2000

MDE Report of Observations

MDE

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION
2500 BROENING HIGHWAY. BALTIMORE, MARYLAND 21224

RY
8.7.00

TYPE OF INSPECTION: RESPONSE TO A COMPLAINT OF DRUMS IN THE OPEN

FACILITY: STONE INDUSTRIAL

EPA ID #: MDD058594920

ADDRESS: 9207 51ST AVENUE
COLLEGE PARK, MD 20740-1910

DATE OF INSPECTION: JULY 31, 2000

DATE: AUGUST 3, 2000

INSPECTOR: O. TRENTON LONDON

FACILITY REPRESENTATIVE(S): MR. JOHN EASTO

REPORT OF OBSERVATIONS

PURPOSE: Responded to a complaint for a neighboring facility that there were drums stacked against the rear fence.

OWNER/OPERATOR: Stone Industrial

FACILITY REPRESENTATIVES: Mr. John H. Easto, Chief Engineer

FACILITY DESCRIPTION: This facility consists of four building enclosed in a fenced compound. The hazardous waste and flammable storage area is in compliance with the 50 ft regulation. This facility makes glass tubing for lights.

COMMENTS: There were drums stacked against the rear and side fence of the property. The fence at the side is adjacent to another industrial area. The 55 gallon drums were stacked on their side three high, and the 30 gallon drums were upright and on wooden pallets. All of the drums are empty and will be picked up in a day or two. I checked the stoppers of a random sample of drums and they were tightly closed. Mr. Easto who stated that all the drums are closed tightly before being picked up later reinforced this. The company that collects the drums is Abbey Drum Company 1440 Chesapeake Avenue Baltimore MD 21226-1043

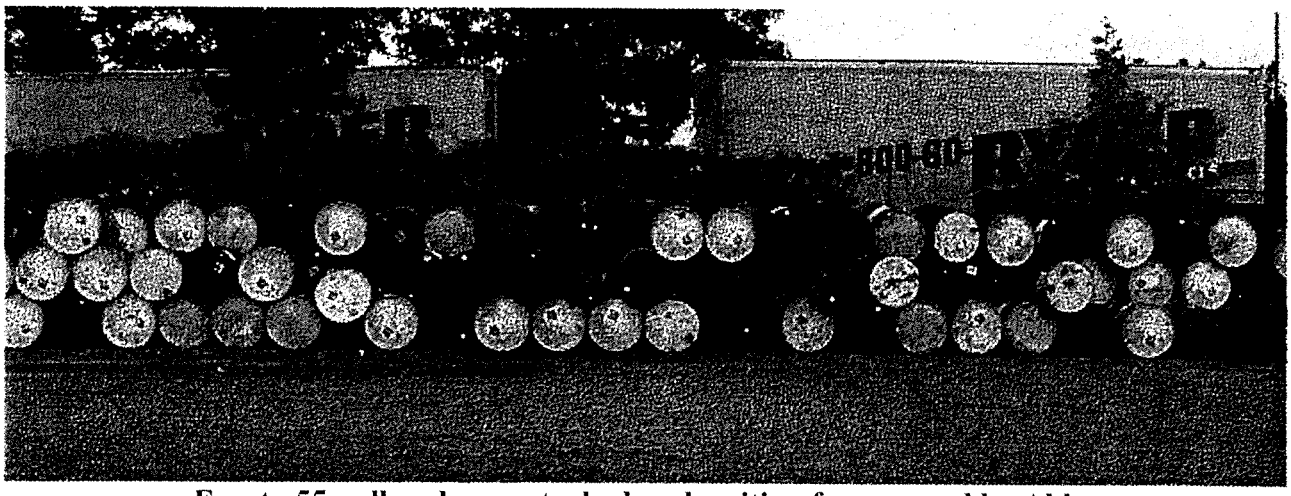
HAZARDOUS WASTE GENERATION: Hazardous waste generated during the manufacturing process is flammable liquids, methyl ethyl ketone and toluene.

WASTE MANAGEMENT: Stone Industrial has an agreement with Kineco 1007 Vulcan Road Benton, AR 72015 to accept their hazardous waste.

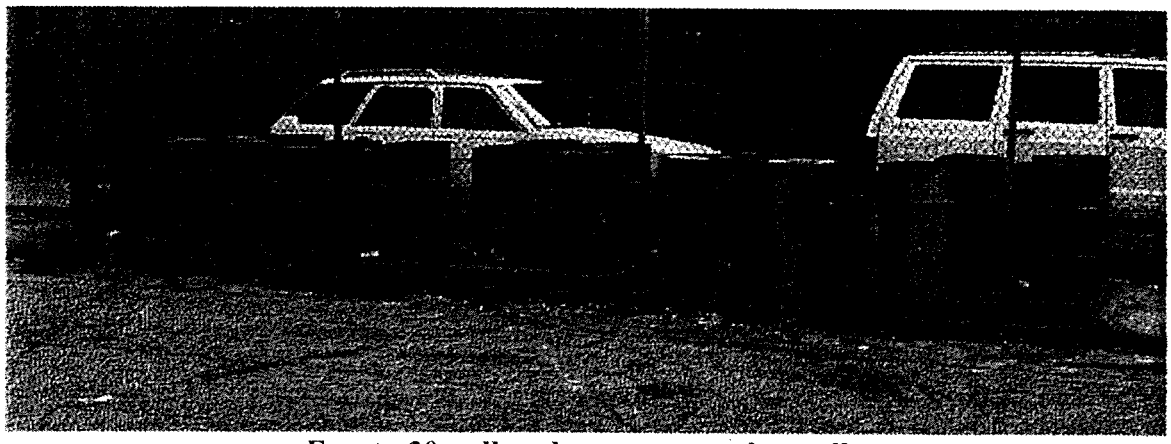
HAZARDOUS WASTE STORAGE: The hazardous waste is stored in a room in a separate building from the actual plant. This building also houses the flammable liquids. The building is actually a warehouse. There were approximately thirty three 55-gallon drums stored here. I did not notice any secondary containment provided for the drums. The floor of the room was not sealed or bermed.

RECORD KEEPING: The manifest was all correctly signed and went back for three years. The contingency Plan and Emergency Procedures were old and had not been revised in awhile. There were names of people who either had retired or no longer work there. The training records for waste handlers are not current. All of the employees handling waste have not been trained since 1997, a few in 1998 and one in 1999.

ENFORCEMENT ACTION: Site complaint number SC-O-00-005 was issued to this facility for the following violations: a) No secondary containment for the 55-gallon drums in the hazardous waste storage area. b) Contingency Plan and Emergency Procedures is not current, a few names are no longer at this facility. c) Personnel training have lapsed.

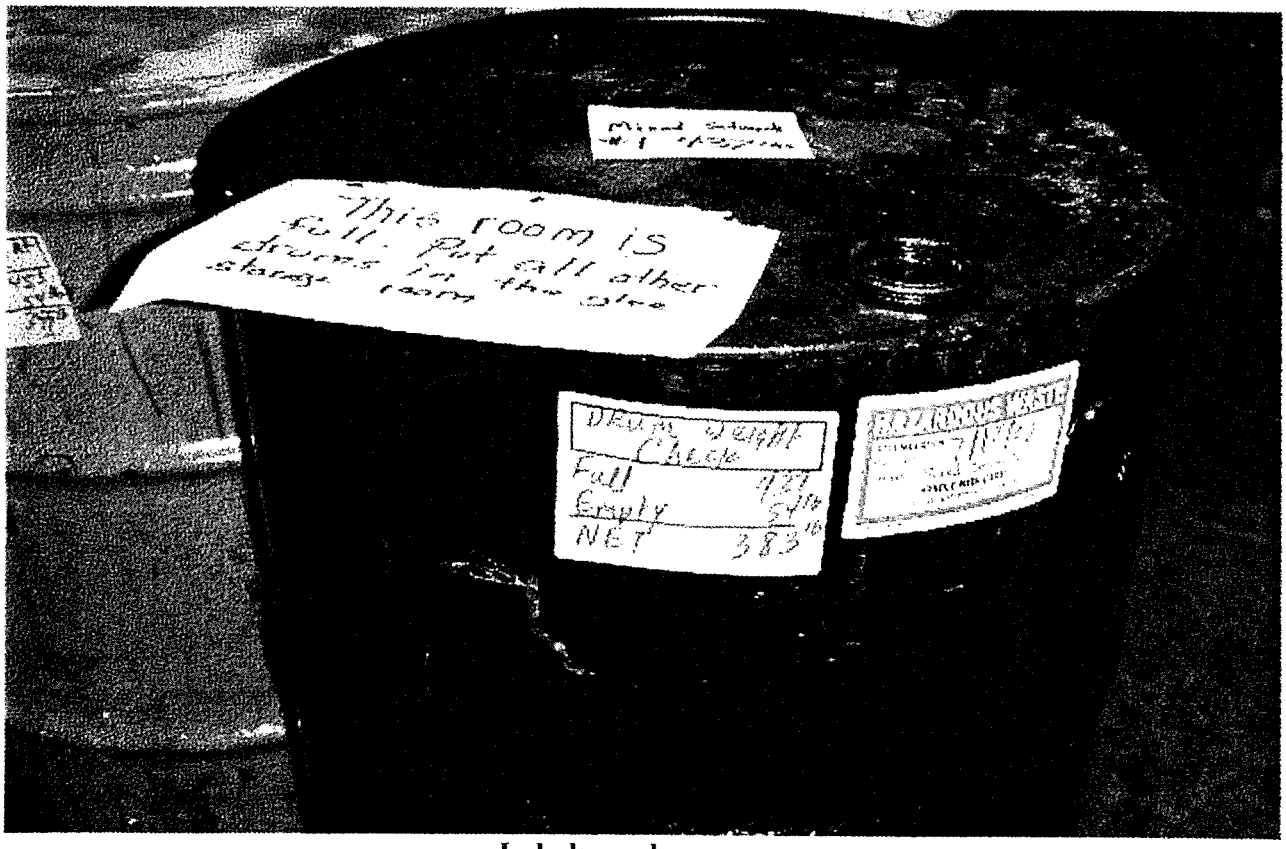


Empty 55-gallon drums stacked and waiting for removal by Abbey.



Empty 30-gallon drums on wooden pallets.

Drums in storage area. No secondary containment & aisle space blocked.



Labels on drums.

Spill cleanup materials.

O. Trenton London
Environmental Engineer
Hazardous Waste Division
Waste Management Administration
Maryland Department of the Environment

MDE

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION
HAZARDOUS WASTE PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(410) 631-3400

INSPECTOR: O. Trenton London **DATE: July 31, 2000**

GENERATOR CHECKLIST

FACILITY NAME: Stone Industrial

ADDRESS:_9207 51st Avenue College Park, MD 20740-1910

FACILITY REPRESENTATIVE: Mr. John H. Easto **TELEPHONE NO.**:_(301) 474-3100

DESCRIPTION OF WORK ACTIVITY:_This facility manufactures spiral lamp tubing

EPA IDENTIFICATION NUMBER? M – D – D – 0 – 5 – 8 – 5 – 9 – 4 – 9 – 2 - 0

Section A - Hazardous Waste Determination

1. Does facility generate hazardous waste(s) as defined in COMAR 26.13.02.10 - .19?.....XYes_No
   If yes, under which category is the waste?

   __X___Ignitable _____Corrosive _X__Reactive _X__TC Toxic _X__RCRA Listed

2. Describe the amount of waste generated (day, week or month).

Section B - Manifest (26.13.03.04)

1. Does generator ship waste off-site?..... X Yes_ No
   (If no, do not complete section B and C)
2. Does generator use manifest?..... X Yes No
   If no, explain:
3. Does generator retain copies of manifest?.....XYes__No__N/A
   If yes, does the manifest include the following information?
   (26.13.03.04C)
   -Manifest document number?.....,XYes__No__N/A

-Generator's name, mailing address & telephone number?.....XYes__No__N/A
-Generator's EPA I.D. number?.....X_Yes__No__N/A
-Transporter name(s) & EPA I.D. number(s)?.....XYes__No__N/A
-Designated TSDF name, address, & EPA I.D. number?..... X Yes__No _N/A
-Alternate TSDF name, address, & EPA I.D. number?.....XYes__No__N/A
-Instructions to return waste to generator if undeliverable?.....X.Yes__No__N/A
-Description of the waste required by DOT regulations?.....X_Yes__No__N/A
-Quantity of each hazardous waste by units of weight or volume?.....X. Yes__No__N/A
-Total number & types of containers given to transporter?.....X_Yes__No _N/A
-Is the proper certification noted on each manifest?.....XYes__No__N/A

4. Has the generator signed & dated manifests (26.13.03.04E)?.....X._Yes__No__N/A
5. Did the generator obtain initial transporter's signature and date of acceptance?.....X..._Yes__No__N/A
6. Do returned copies of manifest include facility owner/ operation signature and date of acceptance?.....X.._Yes__No__N/A
7. Have manifests been retained for three years?.....X_Yes__No__N/A

Section C - Pre-Transport Requirements (26.13.03.05)__N/A

1. Does generator package wastes in accordance with DOT requirements?.....X..._Yes__No
2. Are containers in good condition?.....X. ..Yes__No
   If no, explain:
3. Is the date that accumulation time began clearly marked and visible for inspection on each container?.....X....Yes__No
4. Is period of accumulation less than 90 days?.....X...Yes__No
   -If no, is amount accumulated less than 500 kg or less than 1 kg of acute hazardous waste?.....__Yes__No__N/A
   -If no, explain:
5. Is "SATELLITE ACCUMULATION" no more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste?.....__Yes__No_X_N/A
6. Are containers in good condition, closed, and clearly marked "HAZARDOUS WASTE"?.....Yes__No_X_N/A

Section D - Recordkeeping and Reporting (26.13.03.06)

1. Does the generator keep the following reports for three years?
   -Manifests & signed copies from designated facilities?.....X_Yes__No
   -Annual Reports?.....X.Yes__No
   -Exception Reports?.....__Yes__No_X_N/A
   -Waste Analyses?.....X...Yes__No__N/A

~~Section E~~ - Special Conditions (26.13.03.07)

1. Has the generator ~~received~~ from or transported to a foreign country any hazardous ~~waste(s)~~?.....__Yes__No
   -If yes, has a notice been filed with MDE and EPA?.....__Yes__No__N/A
   -Is this waste manifested & signed by a foreign consignee?.....__Yes__No__N/A
   -If generator transported wastes out of the county, has confirmation of delivery been received?.....__Yes__No__N/A

Section F - General Requirements (26.13.03.05E)

Personnel Training (26.13.05.02G)

1. Does the owner/operator maintain personnel training records?.....X..Yes__No
   If yes, do they include:
   -Job title & written job description of each position?.....X._Yes__No
   -Description of type and amount of training?.....X_Yes__No
   -Records of training given to facility personnel?.....X.._Yes__No

Preparedness and Prevention (26.13.05.03)

1. Is there evidence of fire, explosion, or contamination of the environment?.....X._Yes _No
2. Is the facility equipped with:
   a) Internal communication or alarm system?.....X._Yes__No
   b) Telephone or two-way radio to call emergency response personnel?.....X...Yes__No
   c) Portable fire extinguishers, fire control equipment, spill control equipment, & decontamination equipment?.....X._Yes__No
   d) Water of adequate volume for hoses, sprinklers, or water spray system?.....X.._Yes__No
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?.....X.._Yes__No
4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility?.....X..Yes__No
5. In the case that more than one police or fire department might respond, is there a designated primary authority?.....X..Yes__No
6. If State or local authorities decline to enter into these arrangements, has this been documented in the operating log?.....Yes_X_No__N/A

Contingency Plan and Emergency Procedures (26.13.05.04)

1. Is a contingency plan maintained at the facility?.....X..Yes__No
   If yes, does contingency plan include:
   -Arrangements with local emergency response organizations?.....X..Yes _No
   -Emergency coordinators' names, phone numbers, and addresses?.....X...Yes _No
   -List of all emergency equipment at the facility and description of equipment?.....X...Yes__No
   -Evacuation plan for facility personnel.....X...Yes__No
2. Is there an emergency coordinator on site or on call at all times?.....X..Yes__No
3. Has a copy of the contingency plan been submitted to local or State agencies that may be asked to provide emergency services?.....X...Yes__No
4. Has the plan ever been implemented?.....Yes_X_No
   -If so, was the plan appropriate?.....Yes__No__N/A
   - If the plan was <u>not</u> appropriate, has it been amended?.....Yes__No__N/A

-If the plan was implemented, was the incident recorded
in the operating log and was a written report submitted to MDE?.....Yes__No_X_N/A

Use and Management of Containers (26.13.05.09)

1. Are containers in good condition?.....X...Yes__No
2. Is container made of a material that will not react with the waste which it stores?.....X...Yes__No__N/A
3. Are containers always closed when holding hazardous waste?.....X Yes__No
4. Are containers handled so that they will not be opened,
   handled, or stored in a manner which may rupture them or cause them to leak?.....X...Yes__No
5. Does owner/operator inspect containers at least weekly for leaks and deterioration?.....X...Yes__No
6. Do container storage areas have adequate containment systems?.....Yes_X_No
7. Are containers holding ignitable and reactive waste
   located at least 15m (50 ft) from facility property lines?.....X_Yes__No__N/A
8. Are incompatible wastes or materials placed in the same containers?.....Yes_X_No__N/A
9. Are hazardous wastes placed in washed, clean
   containers when they previously held incompatible waste?.....X._Yes__No__N/A
10. Are incompatible hazardous wastes separated from each
    other by a berm, dike, wall, or other device?.....Yes__No_X_N/A

Annual Reports (26.13.03.06B)

1. Does the facility submit annual reports to MDE?.....X..Yes__No
   If yes, do reports contain the following information?
   a) Name, address and EPA I.D. number of facility?.....X.Yes__No
   b) Date and year covered by report?.....X...Yes _No
   c) Description/quantity of hazardous waste?.....X..Yes__No
   d) Description of efforts to reduce volume/toxicity
      of waste generated, and actual comparisons with
      previous year?.....X.Yes _No
   e) Certification signed by owner/operator?.....X Yes__No

Section G - Other Checklists Completed: _____X_N/A

___ Tanks
___ Transporter
___ Land Disposal Restrictions
___ TSD Facility
___ Surface Impoundment
___ Waste Pile
___ Land Treatment
___ Landfill
___ Incinerator
___ Thermal Treatment
___ Groundwater Monitoring

Section H - Additional Comments

WASTE MANAGEMENT ADMINISTRATION
HAZARDOUS WASTE PROGRAM
COMPLAINT REPORT FORM

RECEIVED BY: Trenton London

A. INCIDENT NUMBER 00 (YR) 07 (MO) 27 (DAY) 007 (SEQ #)

B. TIME NOTIFIED - 24 HR CLOCK 1300

C. NOTIFIER:
Name Scott Narwitch
Telephone (301) 984-0599
Address
County

D. LOCATION OF INCIDENT:
Street 9207 51st Avenue
City College Park
County Prince George
Book Map Coordinates

E. RESPONSIBLE PARTY:
Name Clark Manufacturing
Address
Telephone ( )

F. MEDIUM AFFECTED:
___Surface water ___Air ___Soil/Paved ✓ Groundwater ___Indoor ___See Part 2

G. NATURE OF INCIDENT:
___Chemical ___Open Dumping ___Transfer Operation
___CHS ___Well Contamination ___Aquatic Kill
___Landfill ___Sedimentation ___Sludge/Sewage
___Point Source Discharge ___Surface H2O Quality ___Gas Cylinder
___Storage Tank ___Oil ✓ Other 55-gallon drums

H. CAUSE:
___Industrial ___Mechanical Failure ___Unknown
___Marine ___Operator Error ___Other
___Transportation ___Apparent Vandalism

I. SPILL: (Estimated Quantity)
___Potential (___) ___Spilled (___) ___Recovered (___) N/A ___

J. CLEAN UP:
___State
___Local
___Industry
___Contractor

K. CASE STATUS:
✓ File Created / Open
___Referred to:
___Unfounded Complaint
___Closed Reviewed by:

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(410) 631-3386

SITE COMPLAINT

NUMBER	DATE
SC-O-00-005	07/31/2000

1. Name of violator: Stone Industrial
   Address: 9207 51st Avenue College Park MD 20740-1910
   County: Prince George Phone: (301) 474-3100
2. Violation Type (with reference to the **Annotated Code of Maryland**)
   - ☐ Water Pollution Control and Abatement (Environment Article, Sections 9-301 through 9-344)
   - ☐ Oil Control (Environment Article, Sections 4-401 through 4-418)
   - ☒ Controlled Hazardous Substances (Environment Article, Sections 7-201 through 7-268)
   - ☐ Landfills and Sludge Disposal (Environment Article, Section 9-204)
   - ☐ Other
3. Specifically: COMAR 26.13.03.05 No secondary containment provided in waste storage area
   COMAR 26.13.05.04 Contingency Plan & Emergency Procedures not current
   COMAR 26.13.05.02G Personnel Training is not current
4. You are hereby advised the following corrective actions are necessary. Compliance with the corrective actions contained herein does not preclude the Department from imposing further requirements. In addition, the Department reserves the right to impose sanctions or penalties for the underlying violation(s).
   You have thirty days (30) from the date on this complaint to correct the violations listed above and to make the adjustments to the method of storing the empty drums.
5. The above described violation(s) may result in the Department seeking legal sanctions against you, including the imposition of civil and/or criminal penalties. Continuation of the violation(s) or failure to take the corrective actions described above may result in additional sanctions or penalties.
6. "I hereby acknowledge receipt of this Site Complaint by my signature, which is not an admission of guilt".

Person issued to: Timothy E. Kartheck Title: Vice-Pres. & Gen. Mgr.

Authorized by:
Jane T. Nishida
Secretary
Department of the Environment

Issued by: O. Trenton London
Inspector

Phone: (410) 631-3400

MDE 113
REV. 1/11/88

PRINTED ON RECYCLED STOCK

September 5, 2000

Correspondence Regarding Secondary Containment for Drums

STONE INDUSTRIAL
PRECISION PRODUCTS GROUP, INC.

September 5, 2000

RECEIVED
SEP - 7 2000
ENVIRONMENT

Maryland Department of the Environment
Waste Management Administration
2500 Broening Highway
Baltimore, MD 21224

Attention: Mr. O. Trenton London
Environmental Engineer.

Dear Mr. London,

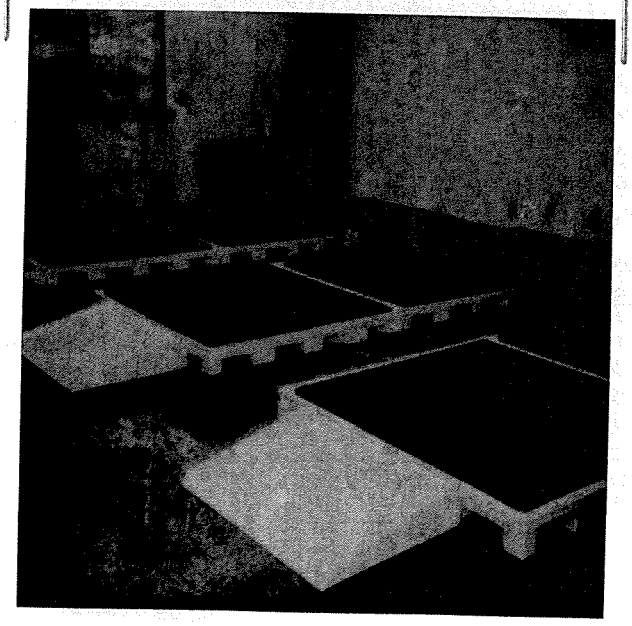
Enclosed please find a picture of the secondary containment for our drums.

Sincerely,

John H. Easto

John H. Easto
Chief Engineer

Enclosure
JHE:djd



9207 51st Avenue
College Park, Maryland
20740-1910

Tel (301) 474-3100
Fax (301) 345-2367
www.stoneindustrial.com

January 15, 2002

Correspondence Containing Contingency Plan for Emergency Response Procedures

STONE INDUSTRIAL
PRECISION PRODUCTS GROUP, INC.

January 15, 2002

RECEIVED
JAN 16 2002

Maryland Department of the Environment
Hazardous Waste Program
2500 Broening Highway
Baltimore, MD 21224
Attention: Olga Patov

Re: "Contingency Plan for Emergency Response Procedures"

Dear Ms. Patov:

Enclosed please find a copy of our "Contingency Plan for Emergency Response Procedures" per your request Tuesday, January 15, 2002.

Sincerely,

John H. Easto

John H. Easto
Chief Engineer

Enclosure
JHE:djd

9207 51st Avenue
College Park, Maryland
20740-1910

ISO 9002 Registered • Certification Number 97-296

Tel (301) 474-3100
Fax (301) 345-2367
www.stoneindustrial.com

RECEIVED
JAN 16 2002
HAZARDOUS MATERIALS MANAGEMENT DIVISION

STONE INDUSTRIAL

Precision Products Group, Inc.

CONTINGENCY PLAN FOR EMERGENCY RESPONSE PROCEDURES

Prepared by
John H. Easto
10/3/00

Revised 9/24/01

Contingency Plan for Emergency Response Procedures

Note:

As required by Maryland COMAR 26.13.05.04, this contingency plan has been sent to the following organizations. Therefore, any revisions to this plan must be sent to each of these:

Doctors Community Hospital
8118 Good Luck Rd.
Lanham, MD
Attention: Sergeant Price

Maryland Department of the Environment
Waste Management Administration
2500 Broening Hwy
Baltimore, MD 21224
Attention: Mr. O. Trenton London

Prince George's County Police Dept.
District I
Commanders Office
5000 Rhode Island Avenue
Hyattsville, MD 20781

Maryland Emergency Management Agency
2 Sudbrook Lane East
Pikesville , MD 21208

LEPC, P.G.C.
6910 Glendale Road
Glendale, MD 20769
Attention: Craig Black

Branchville Volunteer Fire Co.
4905 Branchville Rd.
College Park, MD 20740
Attention: Officer Bauer

Laurel Regional Hospital
7300 Van Dusen Road
Laurel, MD 20707

Prince George's Hospital Center
3001 Hospital Drive
Cheverly, MD 20785

OBJECTIVE

The objective of this plan is to minimize hazards to human health and the environment. It will list and describe key personnel in the event of an emergency, outlining specific procedures these coordinators will observe.

It is the intent and goal of Stone Industrial to maintain a safe and healthy environment for its employees.

STONE INDUSTRIAL
9207 51ST AVENUE
COLLEGE PARK, MARYLAND 20740-1910

(301) 474-3100

Stone Industrial is a manufacturer of spiral wound and extruded tubing. The spiral wound tubes are supplied using materials such as Mylar, Kapton, Nomex, Kraft paper, bond paper, and various combinations of these. The inside diameters range from .026 to 2.500. The extruded tubes are made of the following: Polyethylene, Polypropylene, Nylon, ABS, and Butyrate. The inside diameters of these extruded tubes range from .100 to 1.750.

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MSDS LOCATION, BLDG 2	G
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GAS SHUT OFF VALVES	I
COMAR 26.13.05.04	

I. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

A. OBJECTIVE OF PLAN

1. This contingency plan is designed to maintain minimal hazards to human health, safety risks and the environment. This plan will outline the procedures to be taken in the event of fires, explosions, and sudden or nonsudden unplanned release of hazardous waste constituents into the air, soil or surface water.

2. This plan will outline a coordinator and his subordinates to carry out the provisions of the emergency procedures in the case of a fire, explosion or release of hazardous waste and its constituents, threatening human health and safety or the environment.

B. CONTENTS OF CONTINGENCY PLAN

1. A phone is located near the reclaimer and chemical storage areas.

2. Emergency telephone page code system:
   The following telephone paging code system for notifying others of an emergency situation in the plant or office area should be used.

   a) The word "blue" when used will indicate there is a medical, blood or police emergency.
   b) The word "red" when used will indicate that there is a fire or chemical emergency.
   c) Example: "Paul Mills, 230 blue". This would be a medical emergency at the Disc & Roll area.
   d) Other locations:

1) Plant 3	201	7) Impregnation	220
2) Plastic Winding	203	8) Chemical Room	223
3) Machine Shop	210	9) Extruder	227
4) Slitting	211	10) R&D (plant 3)	236
5) Conference Room	217	11) Shipping	288
6) Sonic Seal	219		

3. In the event of an imminent emergency the area foreman/supervisor shall notify the switchboard.

4. Switchboard Operator:

   a) Notify the emergency coordinator.
   b) Standby for response from emergency coordinator.
   c) During standby, operator will hold all calls except those for emergency response until notified by the emergency coordinator.
   d) Operator should be prepared to immediately call local emergency response teams (i.e. fire, rescue, hospital, hazardous response) upon command from emergency coordinator

5. Emergency Coordinator:

   a) Will respond to all emergency situations.
   b) Make decisions to all appropriate actions.
   c) Direct all incoming response teams to:
      i. Type of emergency.
      ii. Location of emergency.
      iii. All emergency procedures and potential hazardous materials.

6. Emergency Coordinators

   a) Steve Lieb, Chief Coordinator

Business phone	(301) 474-3100 x 280
Direct line	(301) 220-4280
Home	(301) 931-1379

   Jean Burnette, Secondary Coordinator

Business phone	(301) 474-3100 x 279
Direct line	(301) 220-4279
Home	(301) 390-2736

7. Evacuation (Attachment A)

8. Spill Controls – Equipment for Spills (Attachments B&C)

   a) Absorbent
   b) Shovels
   c) Gloves
   d) Boots
   e) Aprons
   f) Plastic bags

9. Emergency procedures

   a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the Emergency Coordinator is on call) shall immediately:
      i. Activate alarms or communication systems, where applicable, to notify all facility personnel; and
      ii. Notify appropriate state or local agencies with designated response roles if their help is needed.
   b) Whenever there is a release, fire, or explosion, the Emergency Coordinator shall immediately identify the character, exact source, amount, and extent of any released materials. He may do this by observation or review of facility records or manifests, and, if necessary, by chemical analysis.
   c) Concurrently, the Emergency Coordinator shall assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both

direct and indirect effects of the release, fire or explosion (for example, the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions). If the Emergency Coordinator determines that the facility had a release, fire or explosion which could threaten human health or the environment outside the facility, he shall report his findings as follows:

i. If his assessment indicates that evacuation of local areas may be advisable, he shall immediately notify appropriate local authorities. He shall be available to help appropriate officials decide whether local areas should be evacuated.

ii. He shall immediately notify either the government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their 24 hour toll-free number (800) 424-8802 and the State's number (410) 333-2950. The report shall include:

1. Name and telephone number of reporter.
2. Name and address of facility.
3. Time and type of incident (release, fire).
4. Name and quantities of materials involved to the extent known.
5. The extent of injuries, if any; and,
6. The possible hazards to human health or the environment outside the facility.

d) During an emergency, the Emergency Coordinator shall take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, reoccur or spread to other hazardous waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

e) If the facility stops operations in response to a fire, explosion, or release the Emergency Coordinator shall monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, wherever this is appropriate.

f) Immediately after an emergency, the Emergency Coordinator shall provide for treating, storing or disposing recovered waste, contaminated soil or surface water, or any other material that results from a release, fire or explosion at the facility.

h) The Emergency Coordinator shall ensure that in the affected areas of the facility:

i. Waste that may be incompatible with the released material is not treated, stored, or disposed of until cleanup procedures are completed.

ii. The emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

g) The owner or operator shall notify the Secretary and appropriate other State and local authorities that the facility is in compliance before operations are resumed in the affected areas of the facility.
The owner or operator shall note in the operating record the time, date and details of any incident that requires implementing the contingency plan. Within 15 days after the incident he shall submit a written report on the incident to the Secretary. The report shall include:

i. Name, address and phone number of owner or operator.
ii. Name, address and phone number of the facility.
iii. Date, time and type of incident (fire, explosion).
iv. Name and quantities of materials involved.
v. The extent of injuries, if any.
vi. An assessment of actual or potential hazards to human health or the environment, where this is applicable.
vii. Estimated quantity and disposition of recovered material that resulted from the incident.

II GENERAL FACILITY STANDARDS

B. GENERAL WASTE ANALYSIS

This waste is a mixture of polyester adhesive curing agent, methyl ethyl, ketone, and toluene.

MEK	10% - 20%
Toluene	5% - 10%
Polyester base solid	80% - 90%

C. SECURITY

1. Facility has a 24-hour ADT system.

2. Facility is enclosed with a 6 foot chain link fence topped with 3 strands of barbed wire. Access is through double gates at the northwest area.

3. The storage area for waste drums is in building #3.

D. GENERAL INSPECTION REQUIREMENTS

Inspections will be made weekly of the reclaimer area and drum storage area. Entries will be made into an inspection log. (page 9).

E. PERSONNEL TRAINING

1. Only designated, trained and qualified persons are to operate the reclaimer and handle or supervise the handling of hazardous waste.

2. Prior to operation of the reclaimer the operator will be given training in the operation of the reclaimer, safety requirements pertaining to the reclaimer and handling and labeling hazardous waste.

3. Annual reviews of training will be conducted maintaining records.

4. Records of training will be kept.

F. GENERAL REQUIREMENTS

1. No smoking signs and flammable material signs are posted.
2. Hazardous material signs are posted at the storage site.

III PREPAREDNESS AND PREVENTION

A. REQUIRED EQUIPMENT

1. ADT alarm system is immediately available.
2. Telephones are available.
3. Portable fire extinguishers are available.
5. Spill control equipment is available.
6. Adequate water is available by means of sprinkler system.

B. TESTING AND MAINTENANCE OF EQUIPMENT

1. Fire extinguishers are checked yearly.
2. Fire drills are conducted.
3. ADT personnel conduct flow tests monthly.

C. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM

1. ADT alarm system is immediately available.
2. Internal alarm system is immediately available.

D. REQUIRED AISLE SPACE

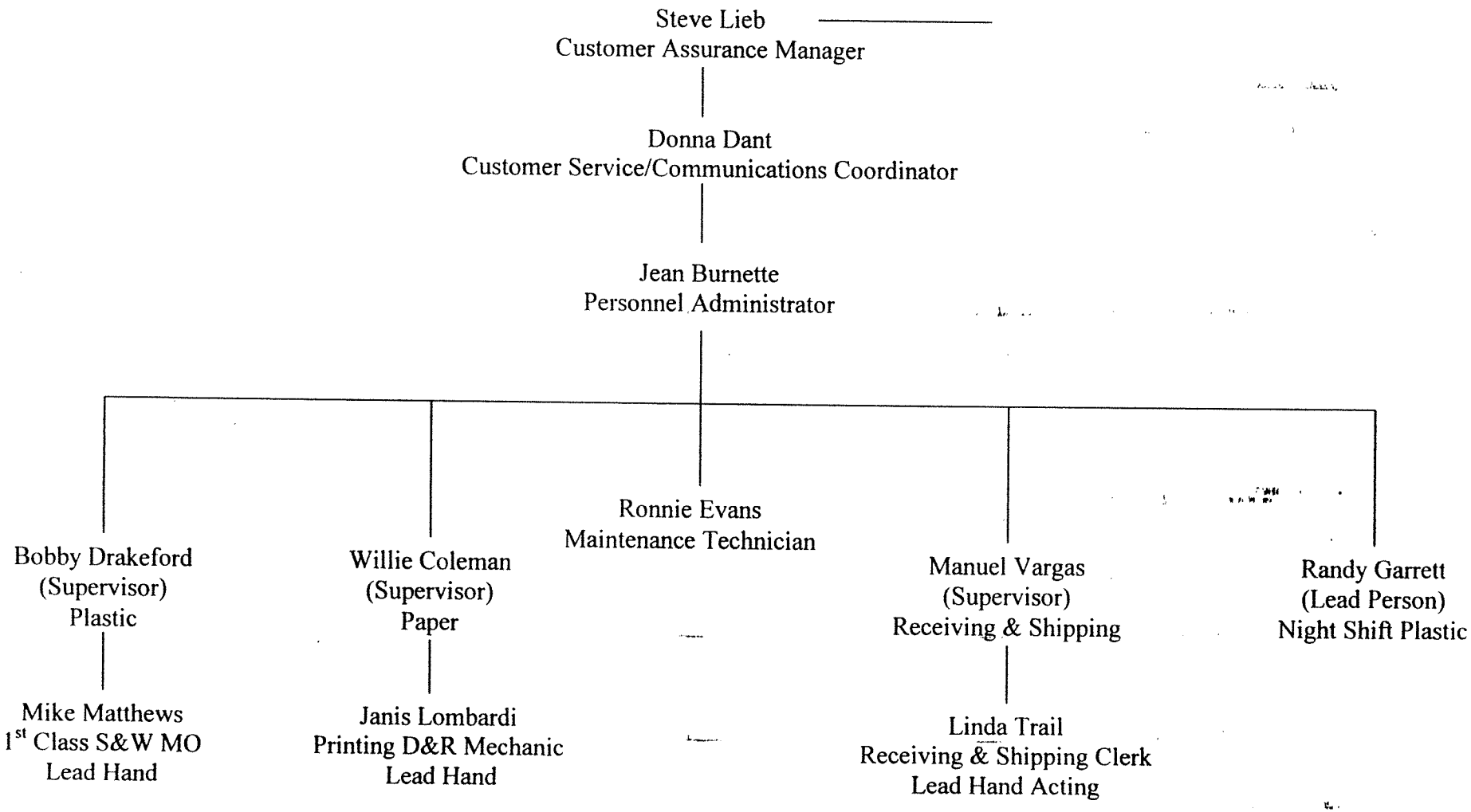
1. Adequate space is maintained at the reclaimer area at all times.
2. Storage of drums or material or equipment is not allowed at the reclaimer area.
3. At the drum storage area correct aisle space is maintained.

E. ARRANGEMENT WITH LOCAL AUTHORITIES

1. See emergency contact list.
2. Copy of plan to be sent to local police, fire departments, and hospital.

COMMAND STRUCTURE FOR

PLAN IMPLEMENTATTION



EMERGENCY CONTACT LIST

Affiliation	Name	Emergency Number	Non-Emergency Number
Police Department	Prince George's County Police Dept.	911	
Fire Department	Branchville Fire Dept.	911	Ambulance/First Aid
Branchville Fire Dept.	911		
Co. Medical Center/Local Hospital	Laurel Regional Doctor's Community	301-497-7954 301-552-8665	301-725-4300 301-552-8118
Hazardous Waste Contractor	RINECO	1-800-377-4692	
Power Company			
Local Poison Control			
Compliance Advisory Company	American Compliance Systems, Inc.	N/A	1-800 – 554-3577
Emergency Coordinator (s):	**Stephen Lieb** 11407 Running Bear Court Beltsville, MD 20705	301-474-3100	301-220-4280 (work) 301-931-1379 (home)
	Jean Burnette 16105 Pointer Ridge Drive Bowie, MD 20716	301-474-3100	301-220-4279 (work) 301-390-2736 (home)
MDE – WMA MDE – Emergency Response Personnel		410-631-3400 410-333-2950 or 410-974-3551	
National Response Center		800-424-8802 202-426-2675	

MDE – WMA (Maryland Department of the Environment
Waste Management Administration)

Stone Industrial

Weekly Inspection Report
Hazardous Material Areas

Week
Ending _____

Description	Chemical Room #3		Chemical Room #2 LS55 Area	
	Yes	No	Yes	No
signs properly posted				
fire extinguisher checked and in place				
all containers properly labeled and sealed				
doors properly secured				
containment area free of spills				
all containers checked for leaks				
leaks if any reported to Emergency Coordinator				
spill kit containers checked for equipment				
recording manual reviewed				
Universal Waste - Batteries/Mercury Switches / Fluorescent lights				

Comments _____

_____

_____

_____

Inspected by: _____
Date: _____

09-032A-0835

Emergency Equipment List

All pieces of emergency equipment and emergency supplies kept at Stone Industrial are identified below by name, giving location, description and capabilities.

Name	Description	Location	Capabilities
Portable Fire Extinguisher	ABC Dry Chemical & Co2	Throughout facility	Hand-held, for fighting most incipient fires
First Aid Kit	Standard industrial size	Throughout facility	
Eyewash Station		Mixing area, slitting area, chemical room	
Emergency Shower		Impregnation, plastic winding, chemical room	
MSDS	Data sheets include hazards & precautions	MSDS stations & engineering files	
Bloodborne Pathogens Response Kit		Throughout facility	

Stone Industrial

FIRE EXTINGUISHER INSPECTION

Date Inspected By Building # 2

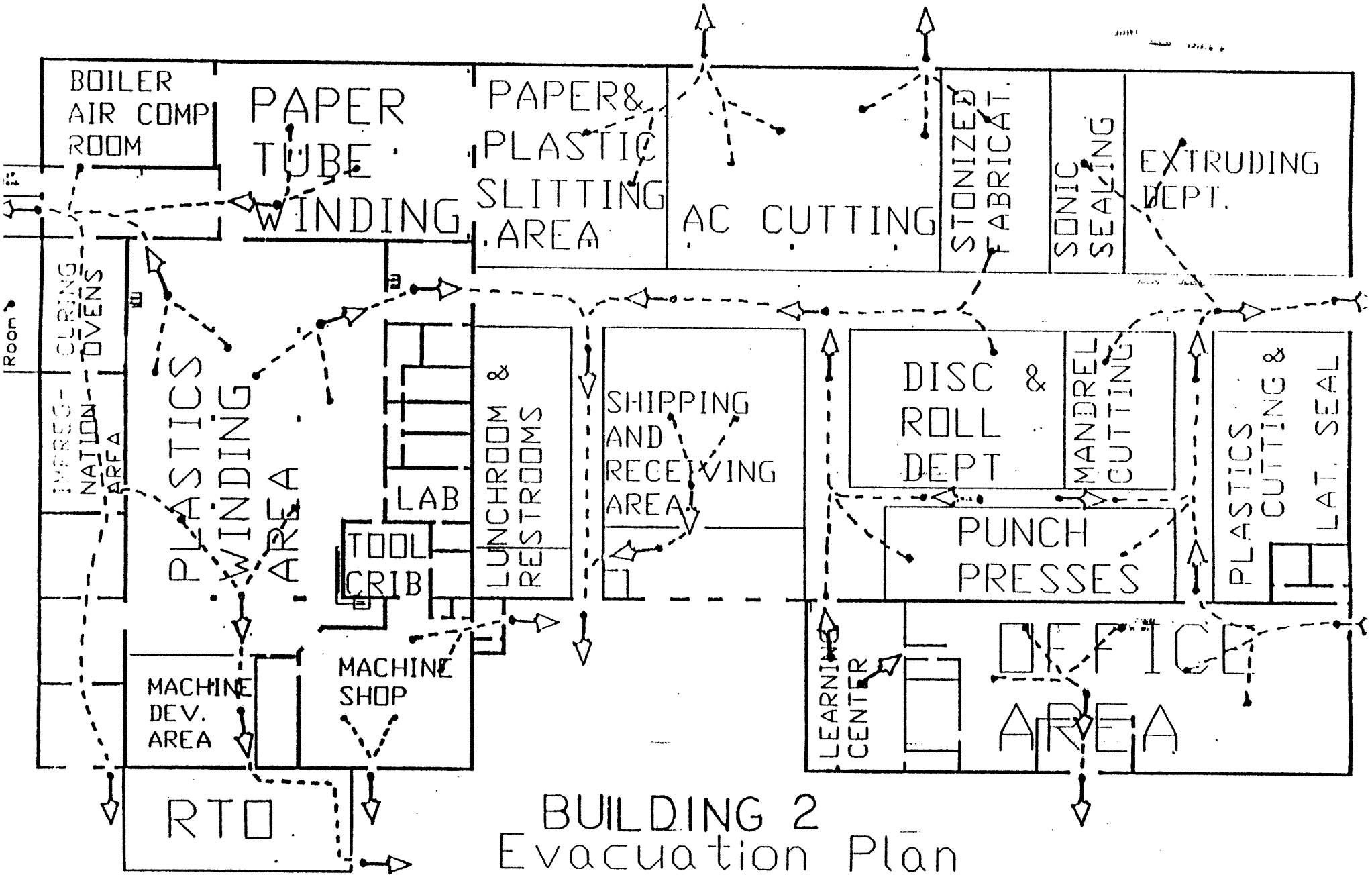
No.	Type	Location
1		
2	CO_2	Extruder Dept., back rack
3	ABC	Extruder Dept., outside pole
4		
5	ABC	Roll up door between buildings
6	CO_2	Office door at Sealer Dept.
7	ABC	Office door at Sealer Dept.
8	CO_2	Plastic Winding Dept.
9		
10	CO_2	Disc & Roll Dept.
11	CO_2	Disc & Roll Dept.
12	CO_2	Oven by slitters
13	ABC	Chemical Room by exit
14	ABC	Office entrance
15	ABC	Receiving & Shipping Dept.
16	ABC	Plastic Tube Dept.
17		
18	ABC	Cafeteria
19	CO_2	Slitting Dept.
20	CO_2	AC Dept.
21	ABC	AC Dept.
22	CO_2	Paper Winding Dept.
23	CO_2	Outside Boiler Room
24	ABC	Main door
25	ABC	Boiler room under fan
26	ABC	Procedyne area
27	ABC	Oven area
28	CO_2	# 20 winder
29	CO_2	# 23 winder
30	CO_2	Behind # 22 winder
31	CO_2	Behind # 23 winder
32	CO_2	# 24 winder
33	CO_2	# 22 winder
34	CO_2	Next to drying tower
35	ABC	Heat Exchanger
36	CO_2	Outside shop roll up door
37		

Stone Industrial

FIRE EXTINGUISHER INSPECTION

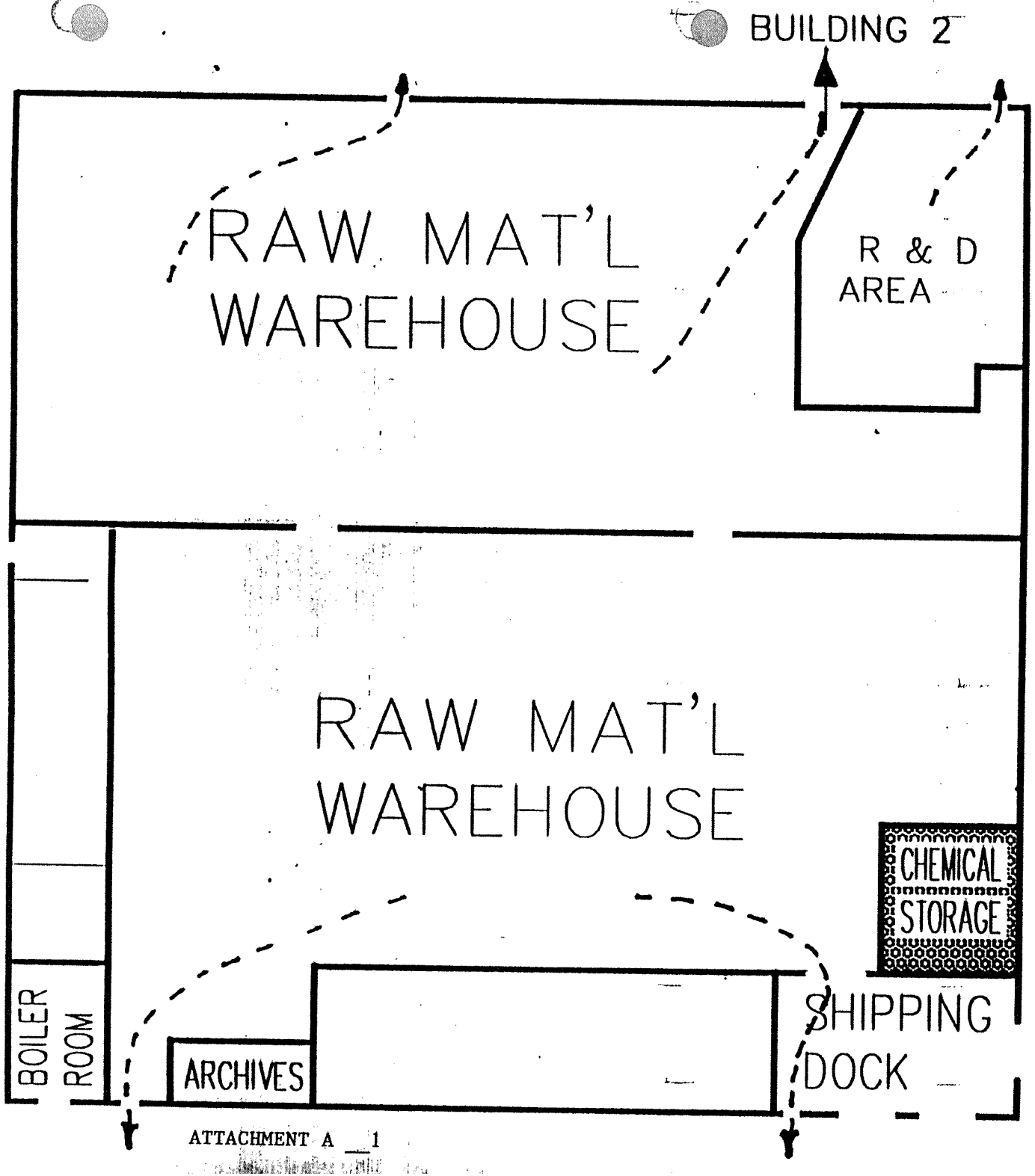
Date Inspected		By	Building # 1, 2, & 3
No.	Type	Location	
38	CO_2	Next to # 21 winder	
39	CO_2	Next to thermostat in Plastic Winding Dept.	
40	CO_2	Back of # 5 winder	
41			
42			
43			
44			
45			
46			
47			
48			
49	ABC	Office front door	
50			
51	ABC	Mail Room	
52	CO_2	Computer Room	
53			
54	ABC	Office back door	
55	ABC	Northwest personnel door	
56	ABC	Northwest area	
57	ABC	Northeast area	
58	ABC	Northwest area – double doors	Building #3
59	ABC	Outside old R&D	Building #3
60	ABC	Inside old R&D	Building #3
61			
62	ABC	Boiler area	Building #3
63	ABC		Building #3
64	ABC	South lighting panel	Building #3
65	ABC	Compressor area	Building #3
66			
67	ABC	R&D area	Building #1
68	ABC	Front hall – north	Building #1
69	ABC	Center hall – west	Building #1
70	ABC	Front hall – south	Building #1
71			
72			
73			
74			

ATTACHMENT A



BUILDING 2
Evacuation Plan
STONE INDUSTRIAL

ATTACHMENT A



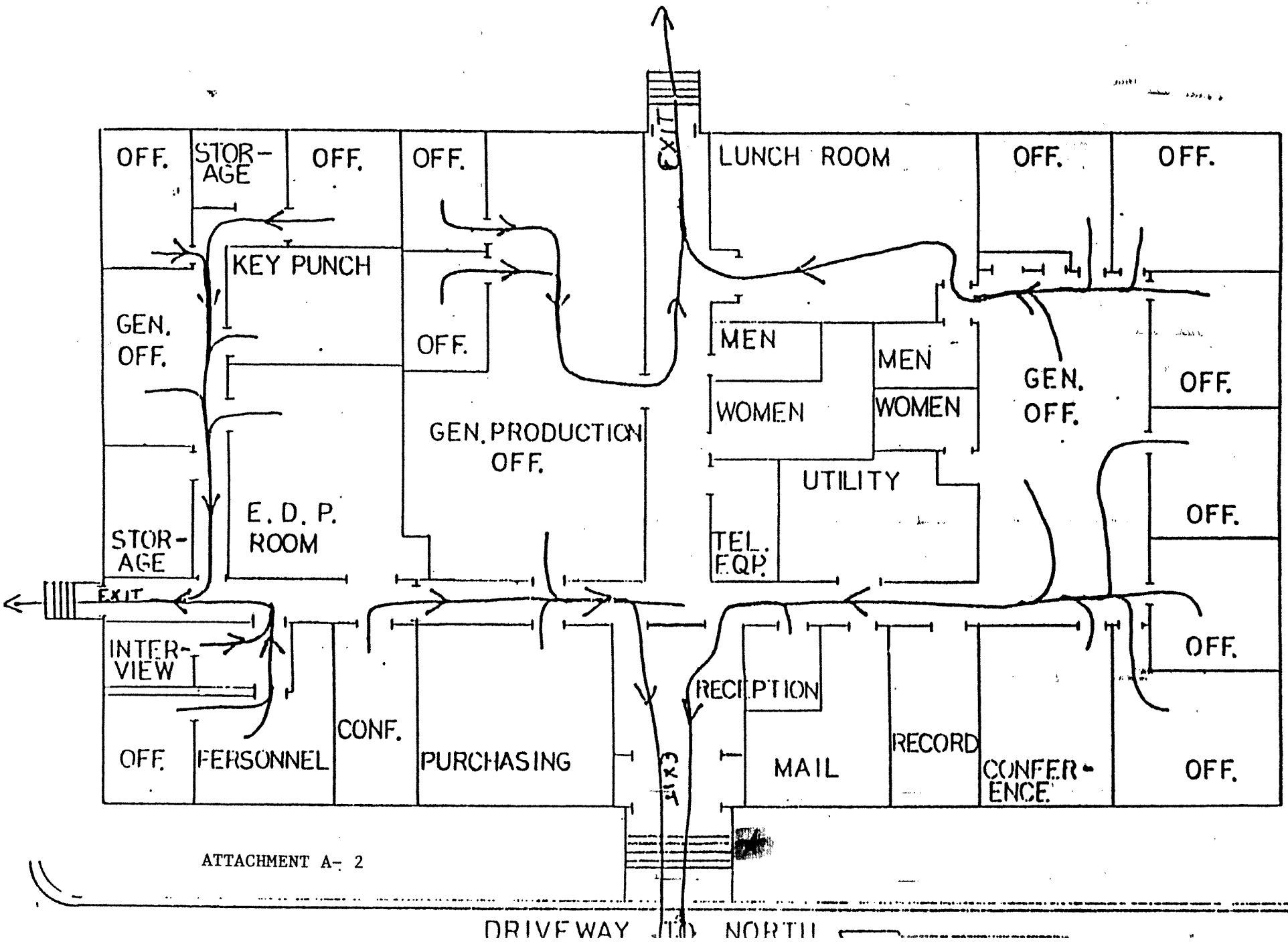
EVACUATION PLAN

BLDG-3
30,625sq.ft.

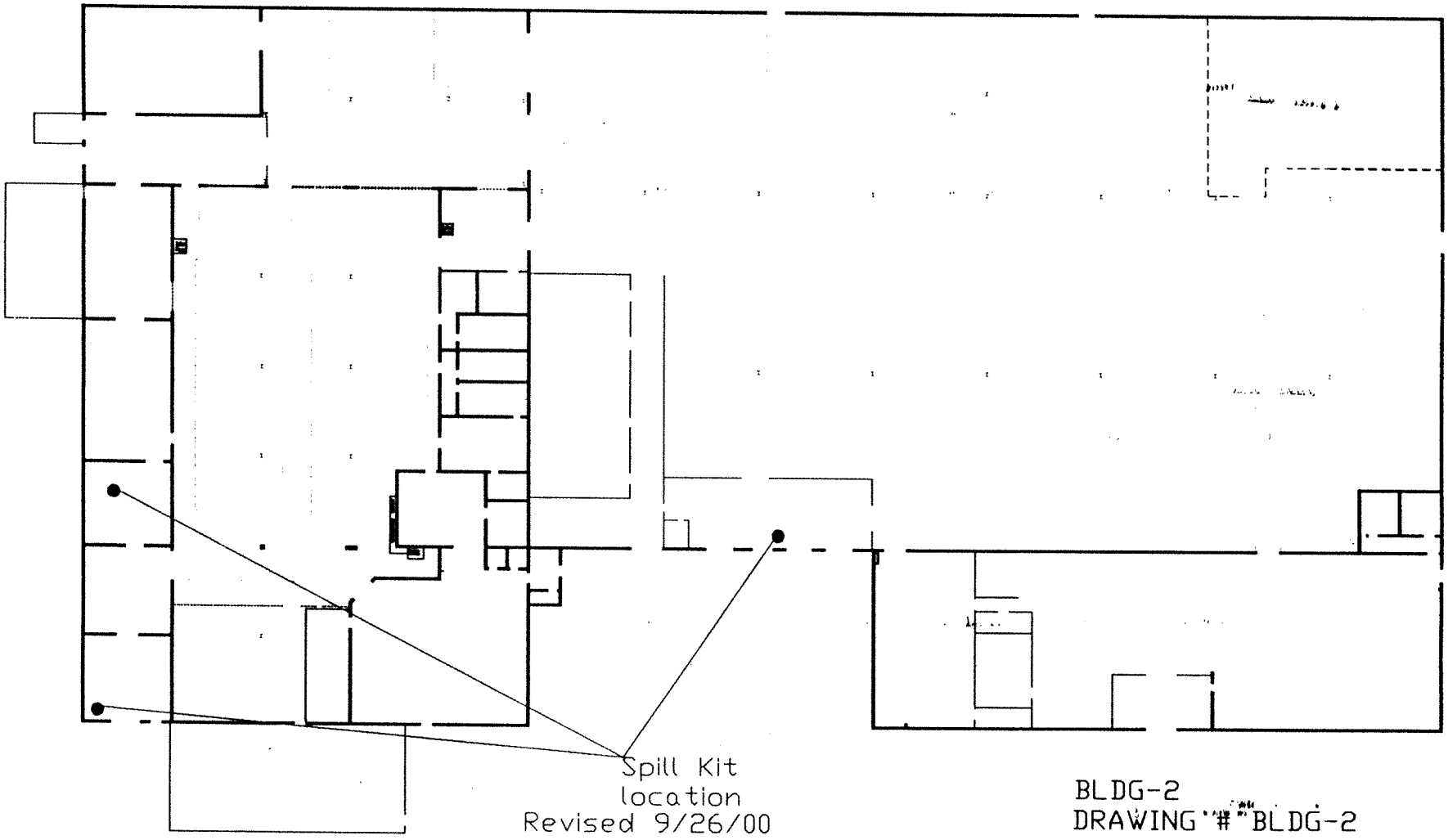
DRAWING NO.
BLDG-3C

ATTACHMENT A 1

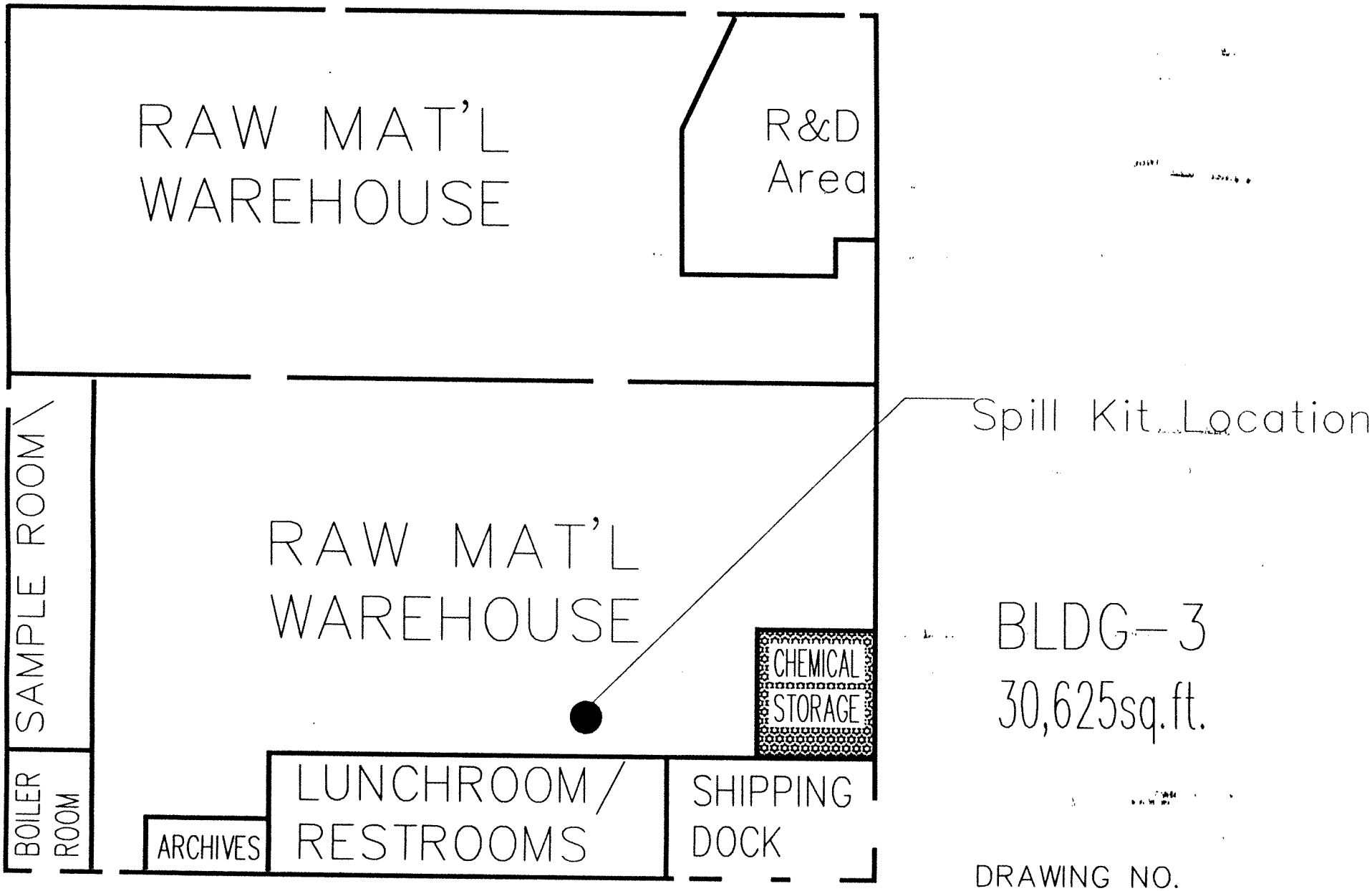
EVACUATION ROUTES — ADMINISTRATION BLDG. # 1



ATTACHMENT A- 2

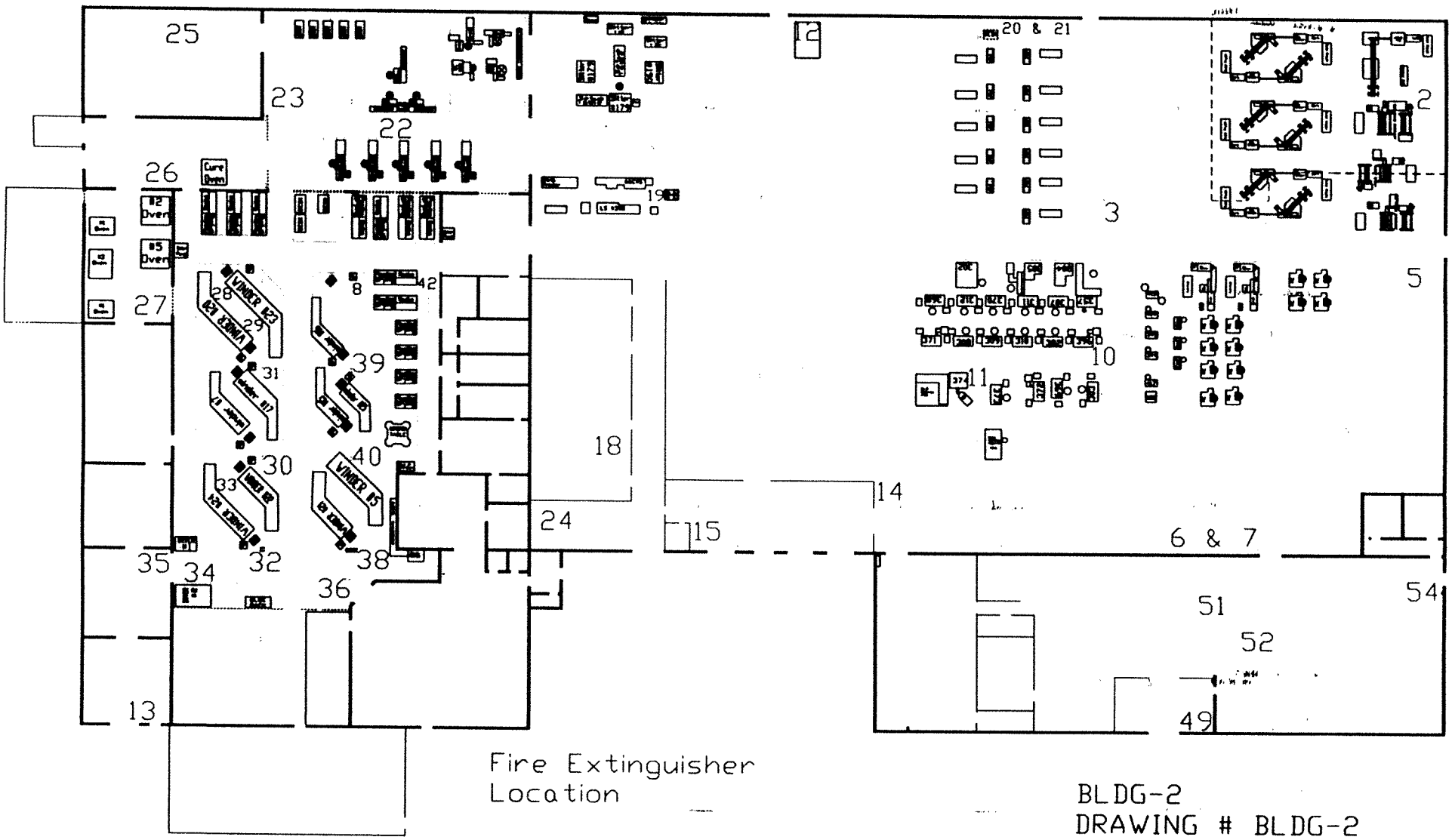


ATTACHMENT B

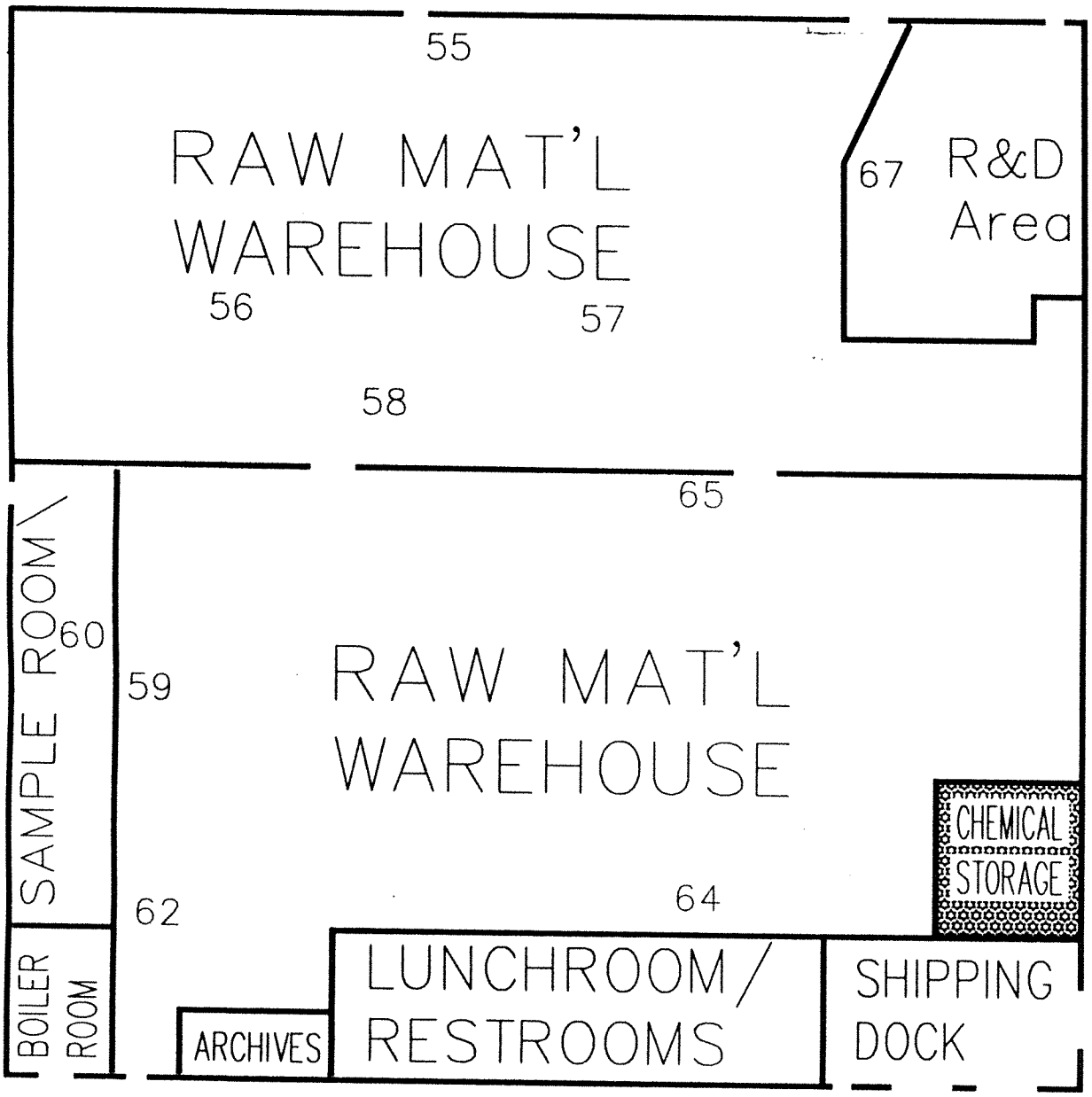


DRAWING NO.
BLDG-3B
4/30/92 Revised 9/26/00

ATTACHMENT C



ATTACHMENT D



BLDG-3
30,625sq.ft.

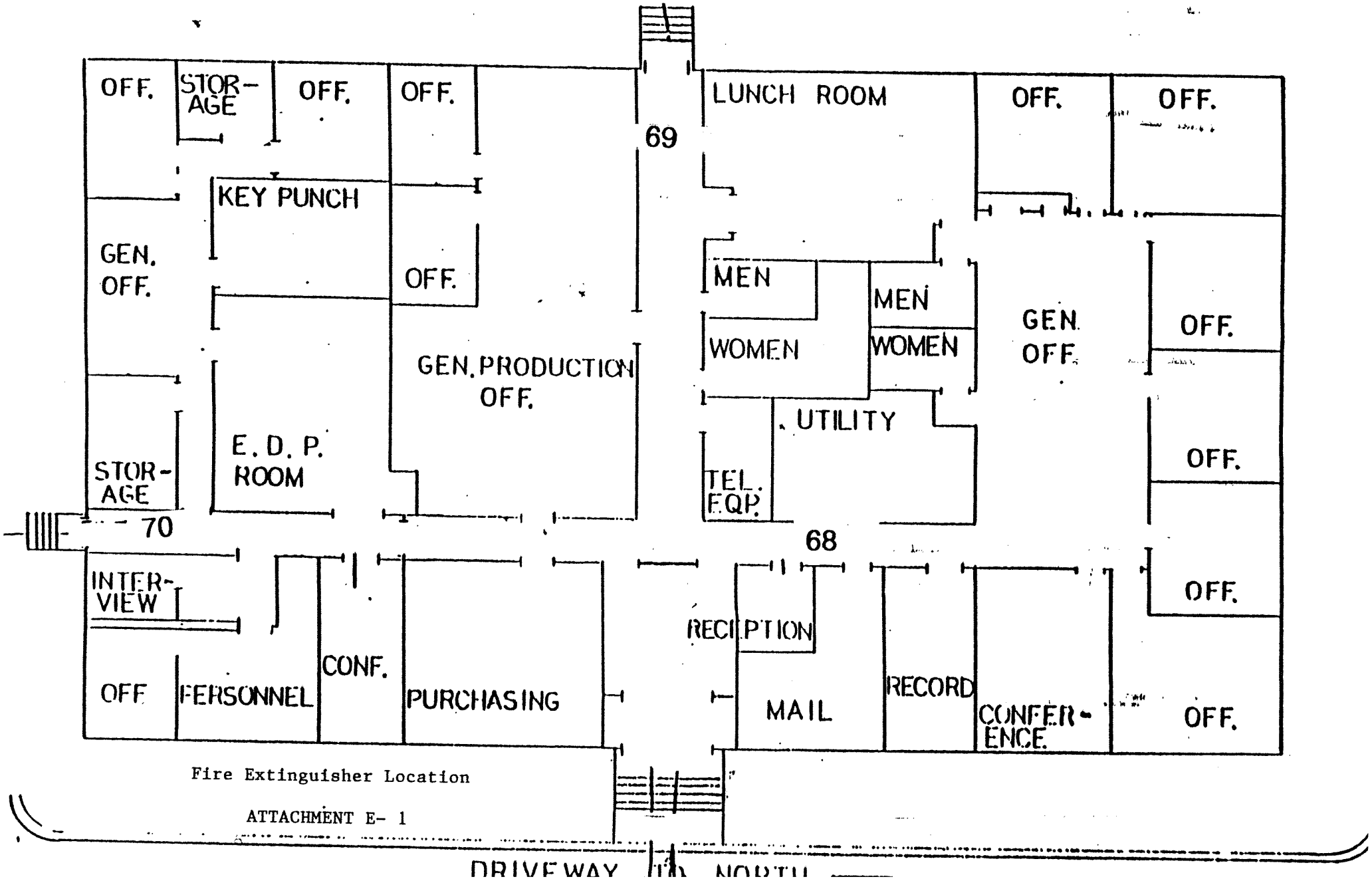
DRAWING NO.
BLDG-3B

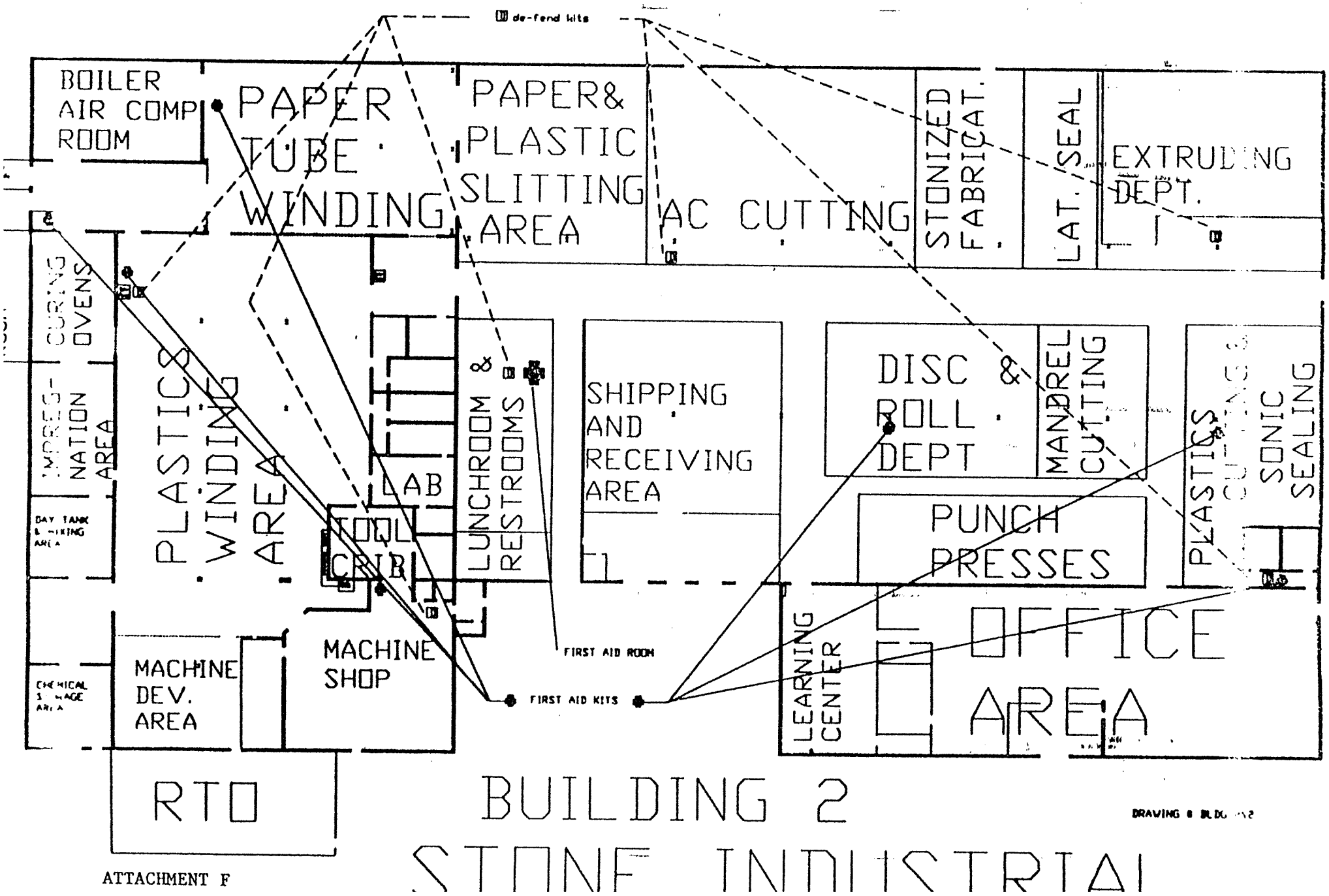
Fire Extinguisher Location

4/30/92 Revised 9/26/00

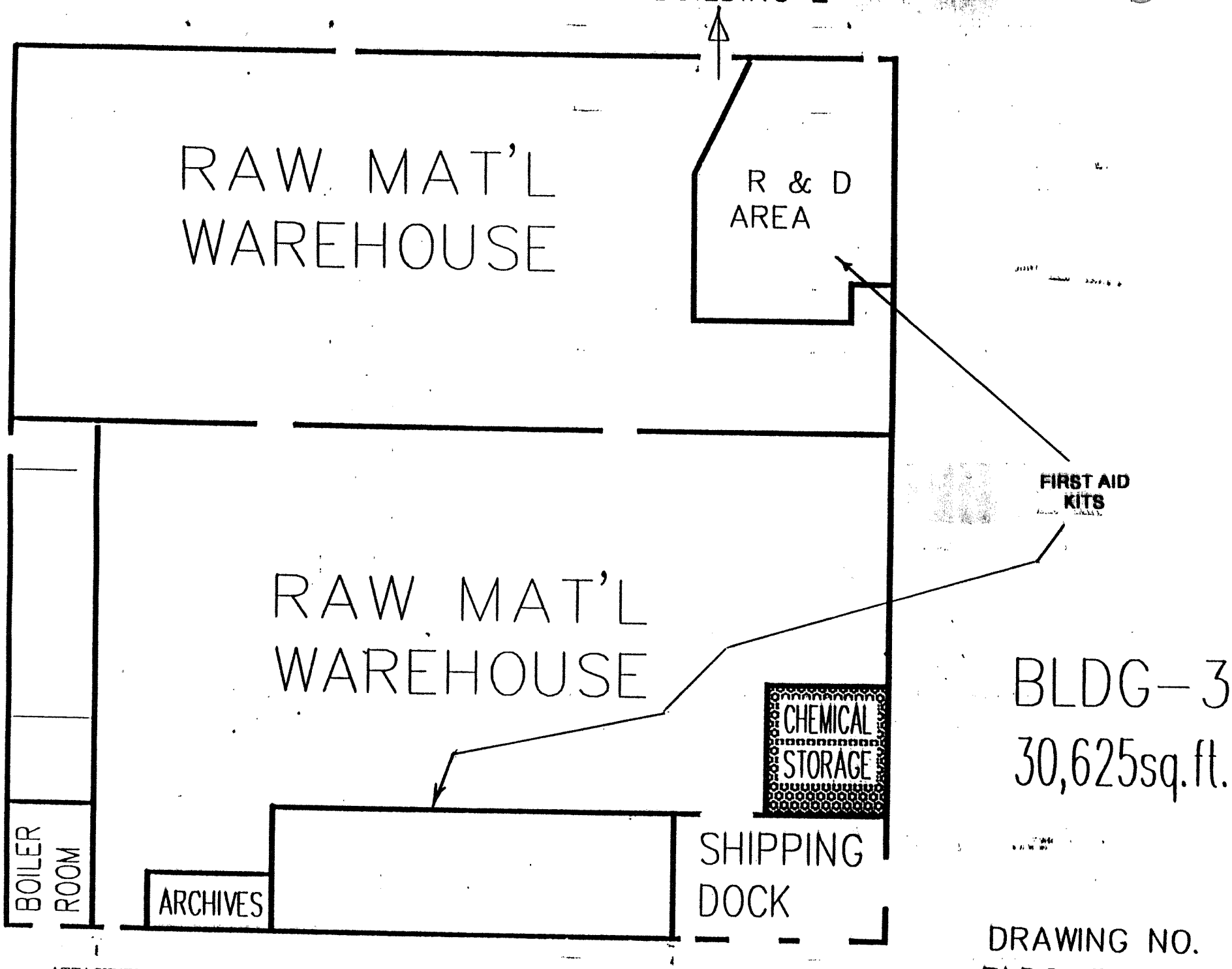
ATTACHMENT E

ADMINISTRATION BLDG. # 1



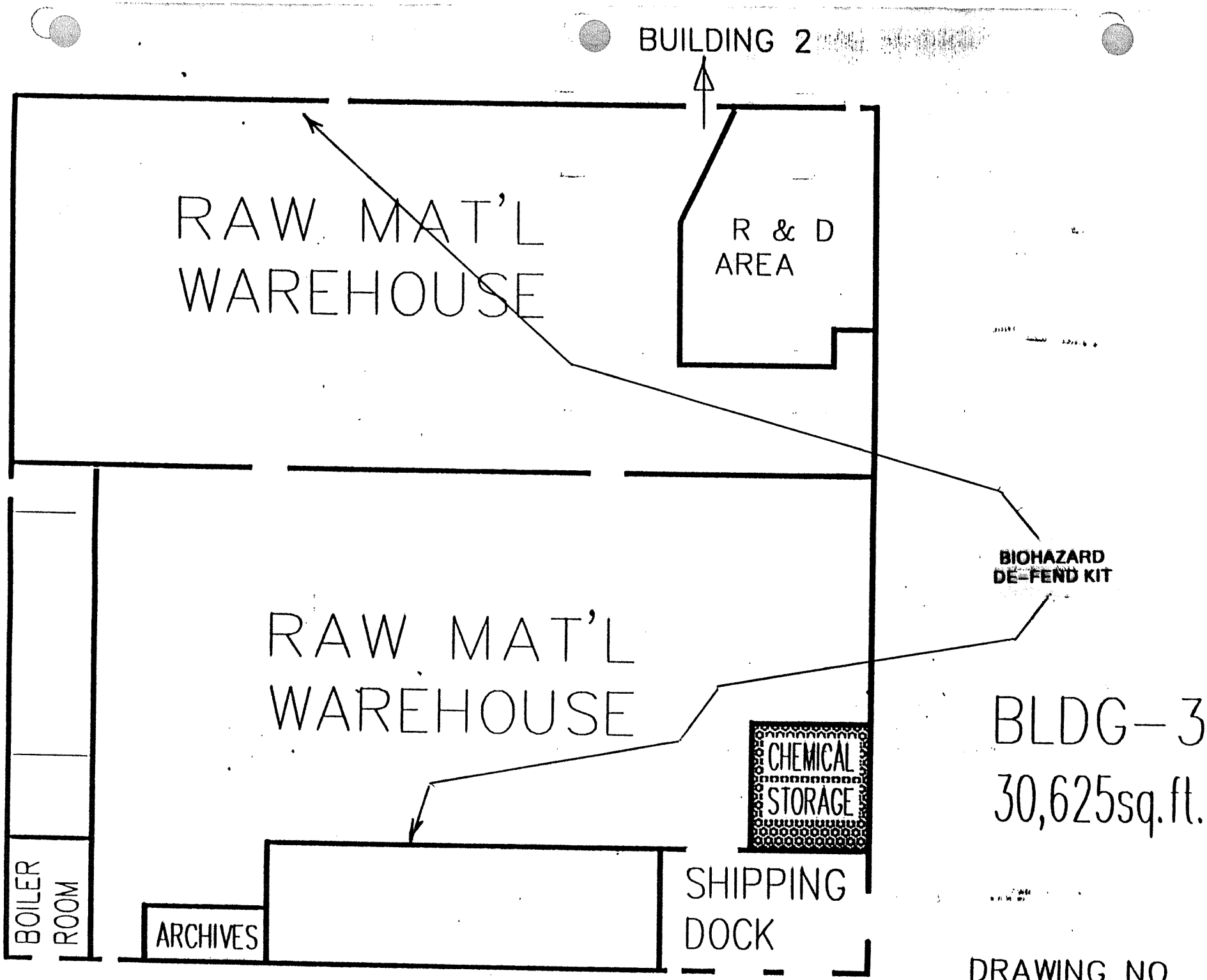


ATTACHMENT F

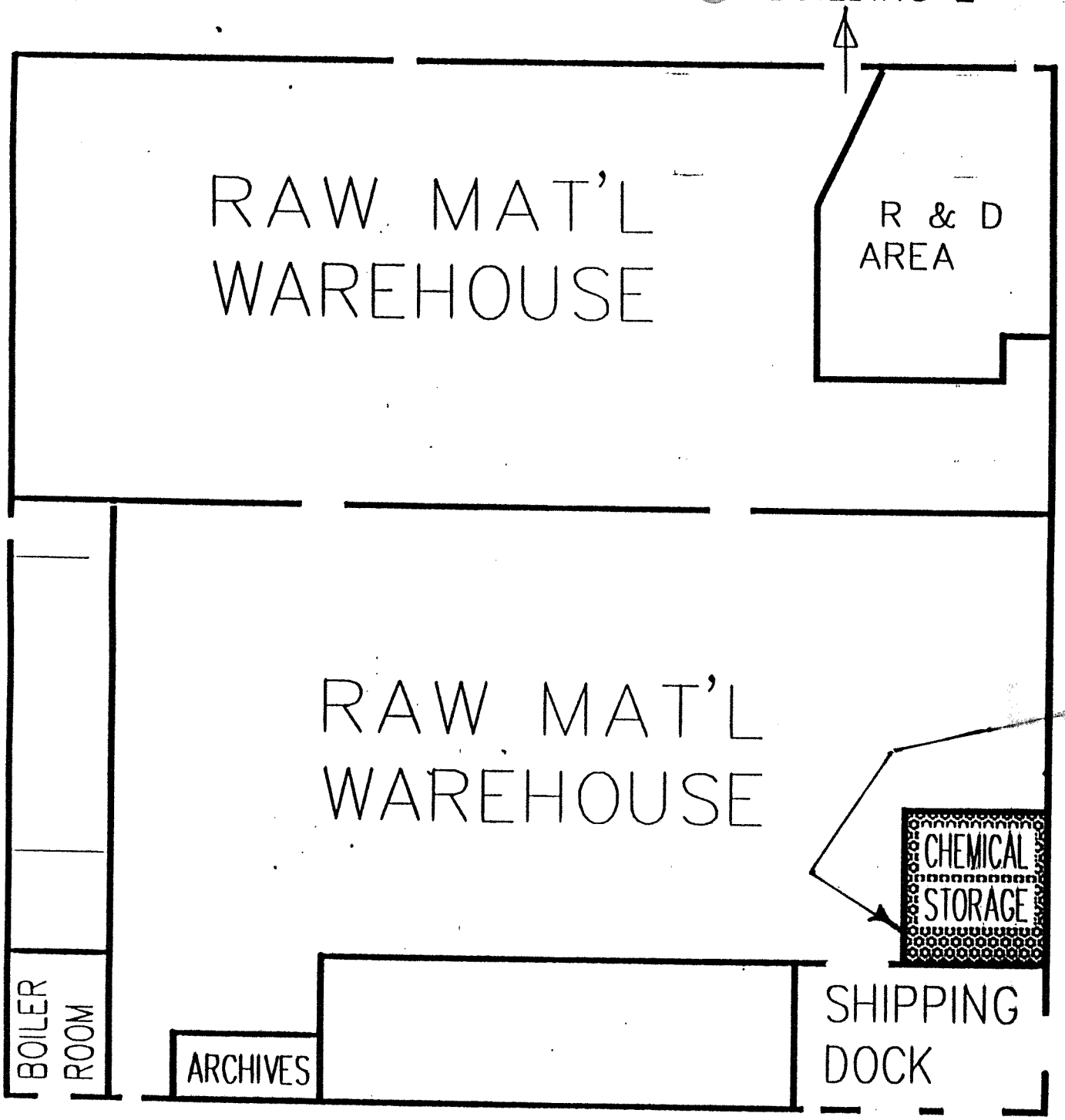


DRAWING NO.
BLDG-3C

ATTACHMENT F -1



ATTACHMENT F - 2

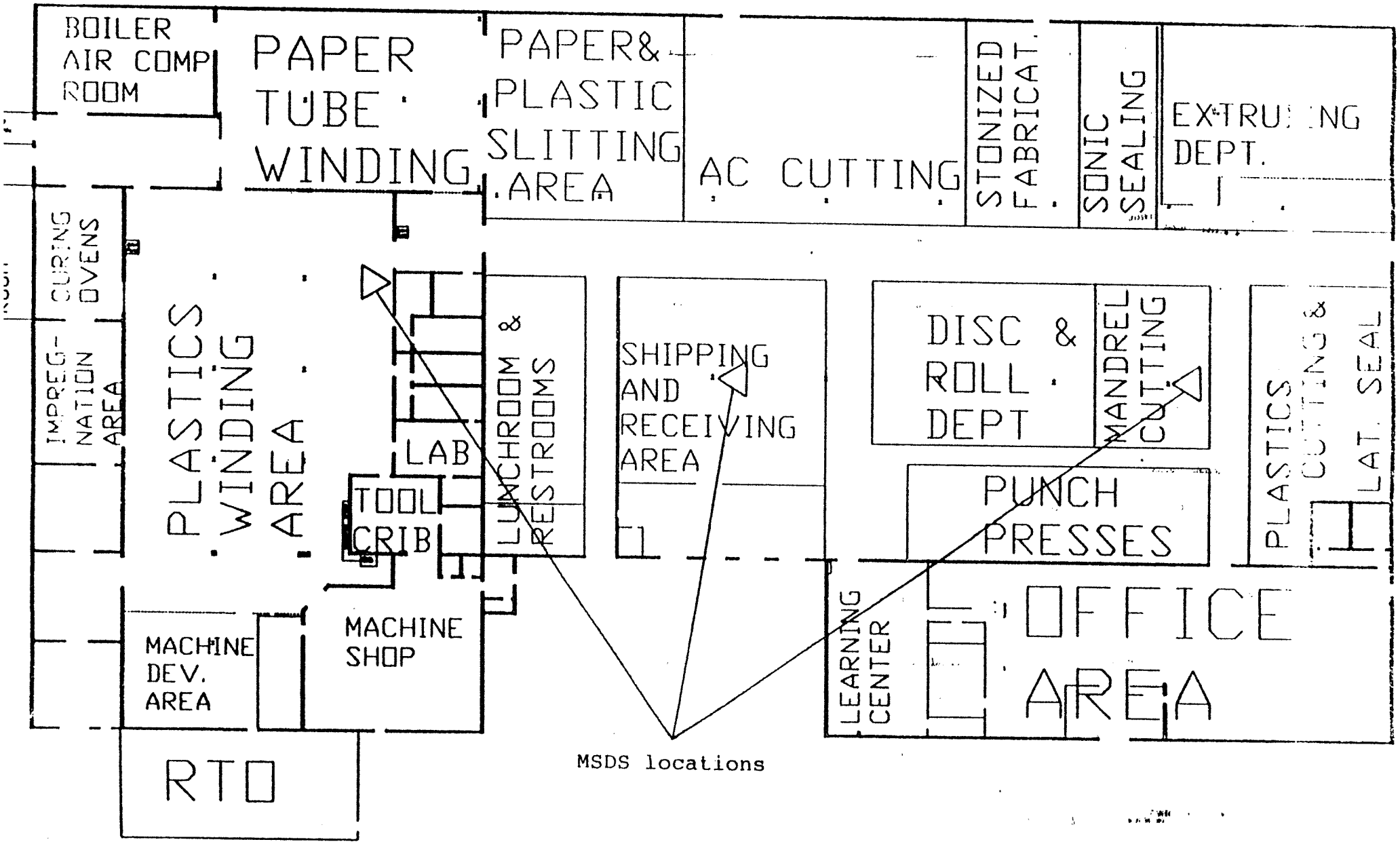


BLDG-3
30,625sq.ft.

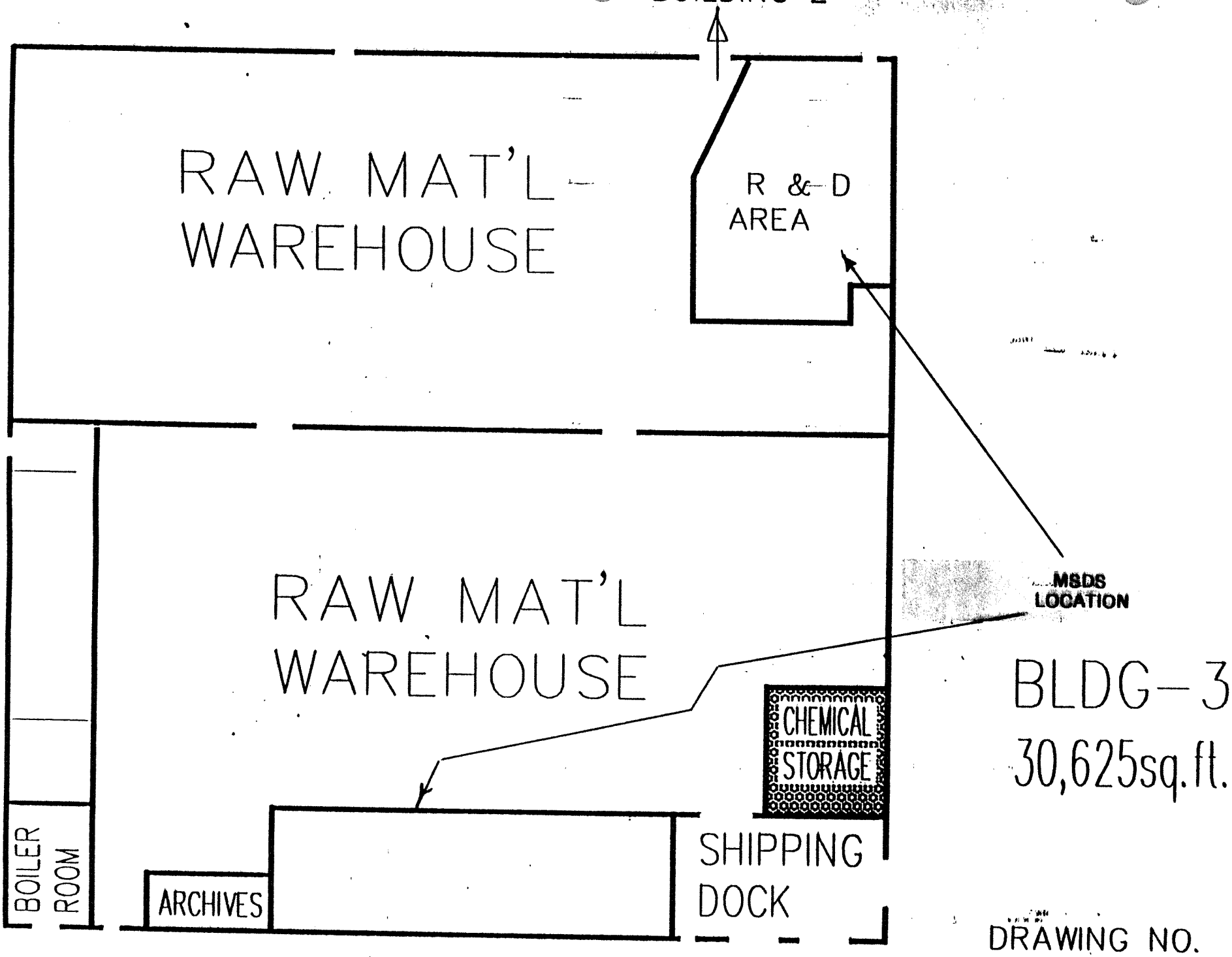
DRAWING NO.
BLDG-3C

ATTACHMENT F - 3

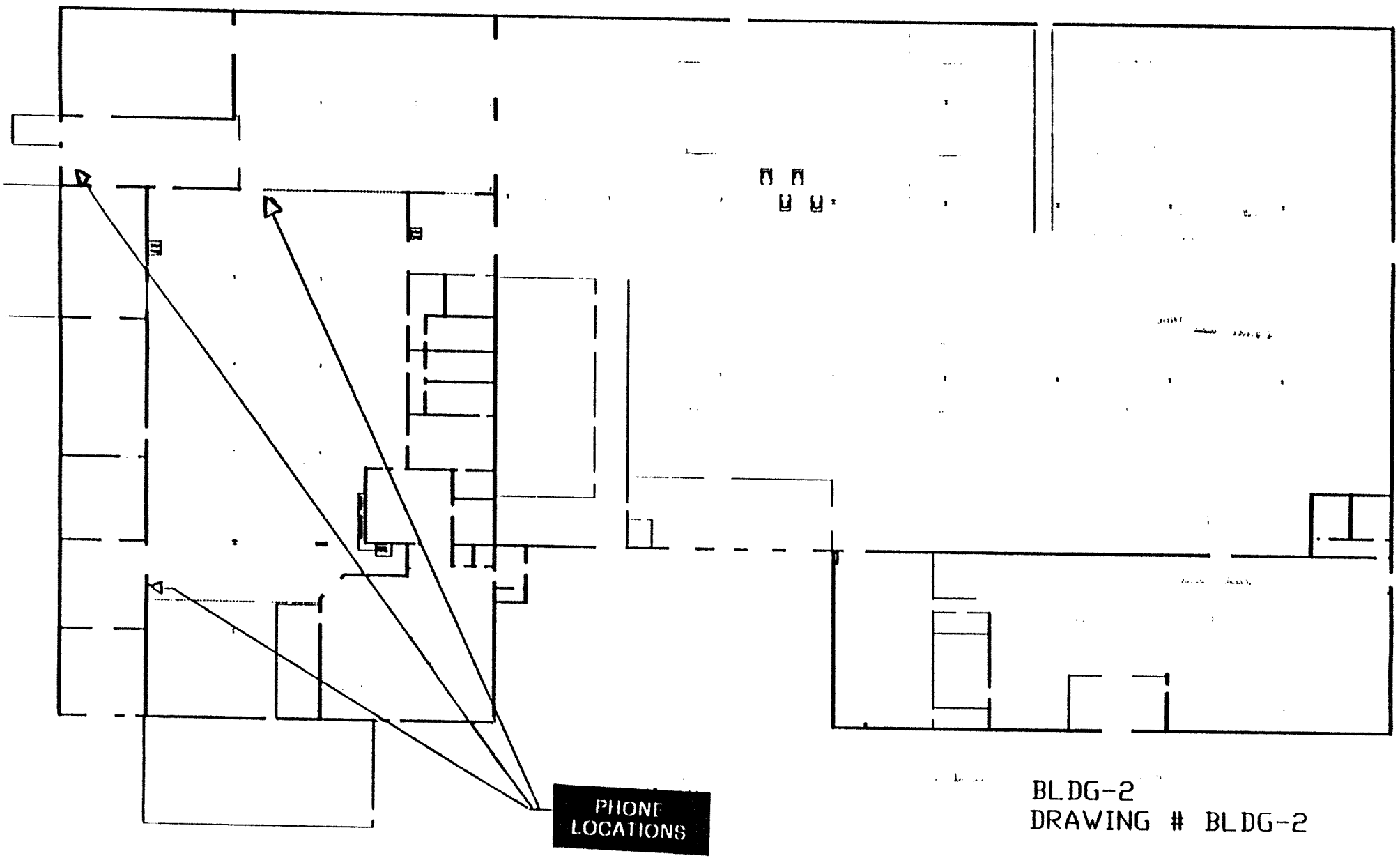
STONE INDUSTRIAL



ATTACHMENT G

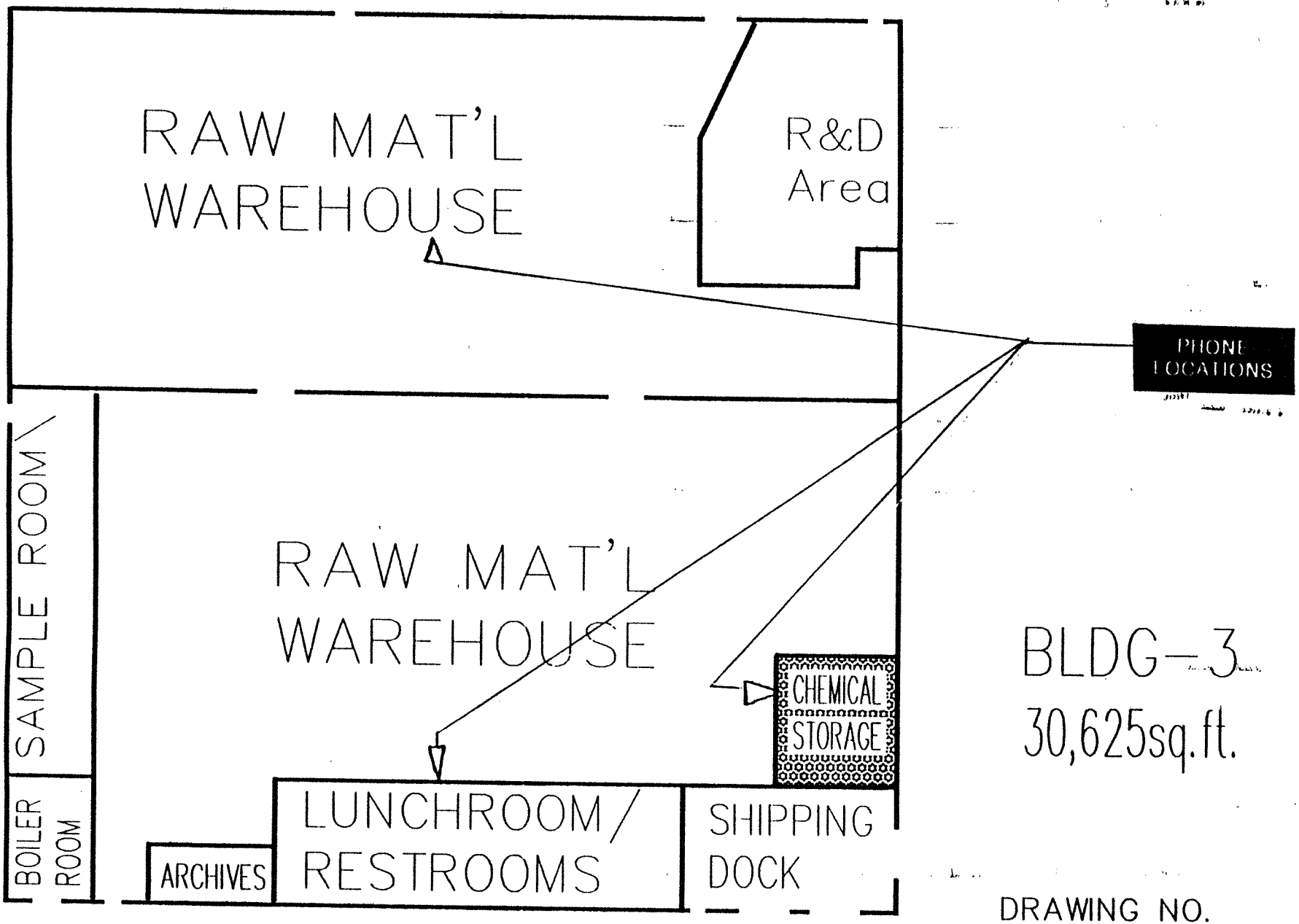


DRAWING NO.
BLDG-3C



BLDG-2
DRAWING # BLDG-2

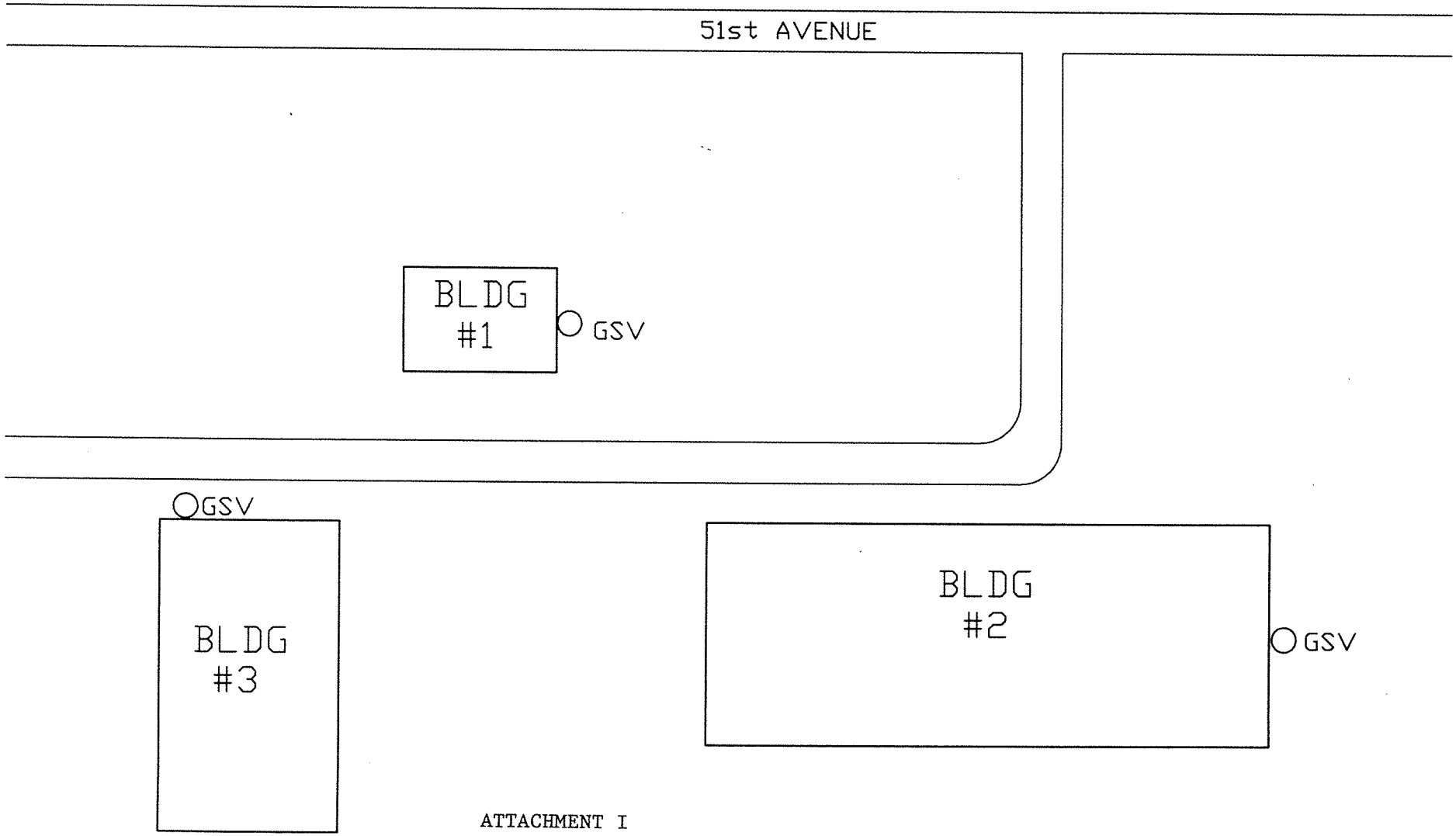
ATTACHMENT H



DRAWING NO.
BLDG-3B
4/30/92 Revised 01/08/01

ATTACHMENT H - 1

REV.	LOC.	DESCRIPTION	DATE	BY



ATTACHMENT I

TOLERANCES-UOS			SCALE	
LINEAR	INCH	ANGULAR	MATERIAL	
X.XX	.010		QUANTITY	
X.XXX	.005		ASSEMBLY	

MACHINE & PART NAME

NATURAL GAS
INCOMING SHUT OFF VALVES

DRAWN BY	T. MOORE	10-23-01
CHECKED		
APPROV.		

STONE INDUSTRIAL
PRECISION PRODUCTS GROUP, INC.

.04 Contingency Plan and Emergency Procedures.

A. Applicability. This regulation applies to owners and operators of all hazardous waste facilities, except as Regulation .01 otherwise provides.

B. Purpose and Implementation of Contingency Plan.

(1) Every owner or operator shall have a contingency plan for his facility. The contingency plan shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

(2) The provisions of the plan shall be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

C. Content of Contingency Plan.

(1) The contingency plan shall describe the actions facility personnel shall take to comply with §§B and G in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

(2) If the owner or operator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR Part 112 or Part 1510, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous

tential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

(4) List of emergency coordinators changes; or

(5) List of emergency equipment changes.

F. Emergency Coordinator. At all times, there shall be at least one employee either on the facility premises or on call (that is, available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person shall have the authority to commit the resources needed to carry out the contingency plan.

G. Emergency Procedures.

(1) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) shall immediately:

(a) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

(b) Notify appropriate State or local agencies with designated response roles if their help is needed.

(2) Whenever there is a release, fire, or explosion, the emergency coordinator shall immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records or manifests, and, if necessary, by chemical analysis.

(3) Concurrently, the emergency coordinator shall assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, or explosion (for example, the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions).

(4) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, or, if the release is of a quantity

(a) Waste that may be incompatible with the released material is not treated, stored, or disposed of until cleanup procedures are completed; and

(b) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

(9) The owner or operator shall notify the Secretary, and appropriate other State and local authorities, that the facility is in compliance with §G(8) before operations are resumed in the affected areas of the facility.

(10) The owner or operator shall note in the operating record the time, date, and details of any incident that required implementing the contingency plan. Within 15 days after the incident, he shall submit a written report on the incident to the Secretary. The report shall include:

(a) Name, address, and telephone number of the owner or operator;

(b) Name, address, and telephone number of the facility;

(c) Date, time, and type of incident (for example, fire, explosion);

(d) Name and quantity of materials involved;

(e) The extent of injuries, if any;

(f) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(g) Estimated quantity and disposition of recovered material that resulted from the incident.

August 16, 2007

MDE Waste Management Administration Inspection Report

Maryland Department of Environment

Waste Management Administration
Hazardous Waste Program
1800 Washington Blvd, Baltimore MD 21230
(410) 537-3400

MDE

TEMPO Agency Interest ID #: 3188

RCRA ID #: MDD058594920

Generator Status: Large Quantity (LQG)

Facility Name: Stone Industrial Precision Products
Address: 9207 51st Ave
City: College Park
County: Prince George's

State: MD **Zip:** 20740

PO 8/21/07
082007

Site Contact: Mike Matthews
Title: Training Leader

Phone #: (301) 474-3100

Inspection Type: <NO DATA FOUND>
Inspection Start Date: August 15, 2007
End Date: August 16, 2007

Activity #: CFI20070001
Time: 12:00 AM ?
Time: 12:00 AM ?

Department Lead Inspector: Anthony Enweze

Documentation ?

☒ Photos/Videos taken	☐ Other documentation
☐ Documents obtained from facility	☐ Request for submission of documents
☐ Samples taken by outside source	☐ Samples taken by the Department

Report Summary

On August 15, 2007, I arrived at the Stone Industrial Precision Products facility to conduct Compliance Evaluation Inspection (CEI). On arrival, I met with Mr. Carl Lynn, Facility Operation Manager who invited Mr. Mike Matthews, Training Leader/Safety & Environment Coordinator to join us for a pre-inspection meeting. I introduced the meeting with a MDE expectations and issues to be covered for the inspection, including facility process for generation of hazardous waste streams, handling and shipment manifests, employee training record, contingency plan, satellite locations, and 90-day storage areas. Mr. Matthews briefed me on their operation, inferring that the facility manufactures various types of tubes that result in generation of Acetone and Toluene mixture that is reclaimed through in house process with residue of contaminated solids. Mr. Matthews acknowledged that the facility is a LQG and all hazardous waste shipments are done within the 90-day holding time. Following the discussion, I reviewed the manifests, MSDS forms, and contingency plan. After review, Mr. Matthews and I commenced a walk-through of the facility to observe general practices for handling and disposing hazardous waste.

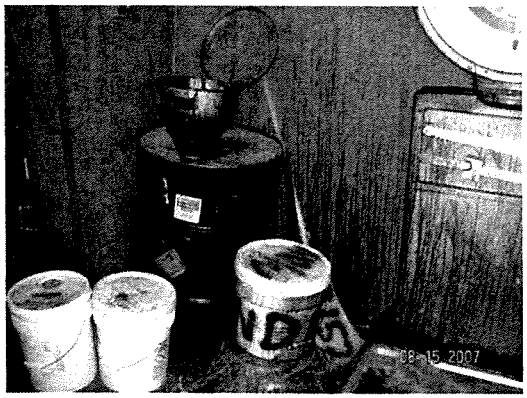
Observations

The facility was well organized and maintained with respect to hazardous waste handling and disposal at the time of inspection. All issues concerning compliance to COMAR requirements were addressed and met.

Conclusion

On the basis of the inspection, no Action is required at this time

Pictures of Hazardous Waste Management at the Facility



Inspection Checklist Results
No violations observed at the facility

Inspector: **Anthony N. Enweze**

Received By: _____ **Title:** _____ **Date:** _____

April 28, 2009

Air and Radiation Management Administration – Inspection and Observation Report

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION MANAGEMENT ADMINISTRATION

INSPECTION AND OBSERVATION / AFS POINT ACTION

Prince George's — COUNTY
Stone Industrial Precision Products — FACILITY NAME
24-033-0429

ADDRESS 9207 51st Ave , College Park, MD 20740

DATE OF INSPECTION YY 09 MM 04 DD 27

ARRIVAL TIME _____ AM ☐ PM ☐

DEPARTURE TIME _____ AM ☐ PM ☐

POINT ID

ANNOUNCED ☐ **UNANNOUNCED** ☐

INSPECTOR NAME Janay Wheeler

STAFF ID: Y 0 7

ACTION TYPE P X

FS FULL COMPLIANCE EVALUATION ON-SITE	FX FULL COMPLIANCE EVALUATION OFF-SITE
PS PARTIAL COMPLIANCE EVALUATION ON-SITE	PX PARTIAL COMPLIANCE EVALUATION OFF-SITE
GI GENERAL INSPECTION	CS MEETING ONLY
OB OBSERVATION	I8 OBSERVE STACK TEST
79 COMPLAINT INSPECTION	82 STAGE II INSPECTION

RESULT CODE 4 8

15 DUST	16 ODORS	28 MISC. SAMPLE TAKEN
41 NOT OPERATING	48 GATHER INFORMATION	67 AMA-19(VISIBLE EMISSIONS) ISSUED
68 AMA-20 (NOV) ISSUED	83 FOLLOW-UP ACTION	90 PERMANENT SHUTDOWN
92 OPEN BURNING	94 VISIBLE EMISSIONS	95 NO VIOLATIONS

AIR PROGRAM 0

0 = SIP 6 = PSD 7 = NSR 8 = NESHAP
9 = NSPS M = MACT V = TITLE V

FACILITY CONTACT Michael Matthews, Manufacturing Resource Coord.
NAME
301-220-4280
TELEPHONE NO.

TEMPERATURE
☐ HOT ☐ COLD
☐ MODERATE

WEATHER
☐ CLEAR ☐ OVERCAST
☐ RAIN/SNOW ☐ PARTLY CLOUDY

WIND DIRECTION
N
W + E
S

WIND SPEED
☐ CALM ☐ MODERATE
☐ LIGHT ☐ STRONG

DISCUSSION: Stone Industrial Precision Products submitted their Emissions Certification Report for calendar year 2008 on 03/26/09. The report is due on 04/01/09. I spoke with Michael Matthews to discuss updating the VOC emissions to include the 12.01 lbs/day from the tube winding process. I input the data into the emissions inventory system, TEMPO.

Janay Wheeler — Inspector Signature — 04/27/09 Date

HR — Supervisor Signature — 04/28/09 Date

AFS COMMENT:

ATTACHED SPECIFIC INSPECTION FORMS

ARMA-34

(REVISED 11-17-03)

2008 EMISSION CERTIFICATION REVIEW (ECR)

FACILITY: Stone Industrial Precision Products

AQCP ID #: 033-0429 **TEMPO® AI #** 3188

AQCP REVIEWER: Janay Wheeler

ECR DATE RECEIVED: 03/26/09

Total Certified Emission (Tons)	**Total Inventory Emissions (Tons)**
SO x 0.002	**SO** x .002
NO x 0.37	**NO** x 0.37
VOC 1.52	**VOC** 1.52
****PM10** 0.007	**PM10** 0.007
Condensables 0.02	**Condensables** 0.02
*****HAPS**	**HAPS**
CO 0.31	**CO** 0.31

Total *Billable Emissions: 1.92

***Billable Emissions = [SOX + NOX + VOC + PM10 + Cond. + HAPS]**

****If PM10 is not reported, use value reported for TSP**
Use N/A if not reported
*****Non-particulate and Non-VOC HAPS**

Annual Emissions Verified & Entered into TEMPO® ☒
Air Toxics Verified & Entered into TEMPO® ☒
No Air Toxics to Report ☐
Title V Compliance Certification Received ☐

COMMENTS:

ECR VERIFICATION / INITIALS: JW **DATE:** 04/27/09

Emission Summary Report

Premises ID: 033-0429

Agency Interest: 3188 **Stone Industrial Precision Products**

Year: 2008

Pollutant	Emissions Total (lbl/day)	Actual Annual Emissions (tpy)	
Carbon Dioxide	4,063.580000	442.373950	*Greenhouse Gas
PM2.5 (Particulate Matter - Filterable)	0.000000	0.000000	
PM Condensables	0.193000	0.021010	
Nitrogen Oxides	3.395000	0.369425	
PM10 (Particulate Matter - Filterable)	0.065000	0.007075	
VOC (Volatile Organic Compounds)	12.195000	1.521400	
Dibutyl Phthalate	0.008000	0.001000	
CO (Carbon Monoxide)	2.845000	0.309705	
Nitrous Oxide	0.075000	0.008150	*Greenhouse Gas
PT (Particulate Matter)	0.257000	0.027995	
Sulfur Oxides (SOx)	0.020000	0.002185	
Methyl Isocyanate	0.390000	0.048750	
Methane	0.078000	0.008490	*Greenhouse Gas

Billable Criteria Emissions (tpy):	1.921095
Billable HAP:	0.000000
Total HAP Emissions:	0.049750
Total GHG Emissions:	442.390590

033-00429
Wheeler

STONE INDUSTRIAL
PRECISION PRODUCTS GROUP, INC.

Stone Industrial is in compliance with regard to Maryland's Air Toxic Regulations (COMAR 26.11.15) for the past calendar year.

3/23/09

Michael Matthews
Manufacturing Resource Coordinator

033-00429
Wheeler

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard, Suite 715 • Baltimore Maryland 21230-1720
410-537-3000 • 1-800-633-6101 • http://www.mde.state.md.us
Air and Radiation Management Administration
Air Quality Compliance Program
410-537-3220

MAR 2 4 2009
By

FORM 1:

GENERAL FACILITY INFORMATION
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2008

	Do Not Write in This Space
A. FACILITY IDENTIFICATION Facility Name Stone Industrial	Date Received Regional
Address 9207 51st Ave	Date Received State
City College Park County Prince Georges Zip Code 20740-1910	AIRS Code
B. Briefly describe the major function of the facility	FINDS Code
Manufacture of Spiral Wound Tubing	SIC Code
	Facility Number:
	TEMPO ID:
C. SEASONAL PRODUCTION (%, if applicable) N/A	Reviewed by:

Winter (Dec.-Feb.)	Spring (Mar – May)	Summer (Jun – Aug)	Fall (Sept – Nov)

Name Date

D. Explain any increases or decreases in emissions from the previous calendar year for each registration at this facility.

Lower Emissions due to decreased Production in 2008.

E. CONTROL DEVICE INFORMATION (for NOx and VOC sources only)

Control Device	Capture Efficiency	Removal Efficiency
Regenerative Thermal Oxidizer	99%	97%

I am familiar with the facility and the installations and sources for which this report is submitted. I have personally examined the information in this report, which consists of ____ pages (including attachments), and certify that the information is correct to the best of my knowledge.

Michael Matthews — Name (Print/Type)
Manufacturing Resource Coo. — Title
3/23/09 — Date
Michael Matthews — Signature
301-220-4280 — Telephone

1/09/08

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2008

Facility Name: Stone Industrial **Facility ID:** 033-00429 **Pollutant:** V.O.C.

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions Tons/yr	Actual Emissions Lbs/day	Operating Schedule (Actual) Hrs/dy	Dys/wk	Wk/yr	Days/yr	TOSD Lbs/dy	Operating Schedule Hrs/dy	Start	End	Emissions Methods
5-0794 2m BTU/Hr Boiler		Nat. Gas	S	0.004	0.039	24	7	26	180	Boiler not in use				C2
			F											
5-0795 2m BTU/Hr Boiler		"	S	0.004	0.046	24	7	26	180	during TOSD time period				C2
			F	~~0.004~~	~~0.046~~									
6-0616 R.T.O.		"	S	~~0.013~~	~~0.100~~	16	5	50	250	0.100	16	7 AM	2 AM	C2
			F	1.5	12.1									
6-0614 Curing Ovens		"	S	0	0	Curing Ovens Not in Service								C7
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
Total				~~0.021~~ 1.68	~~0.095~~ 12.195					0.100				

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

x changes discussed with Mr. Michael Matthews on 04/27/09

1/09/08

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2008

Facility Name: Stone Industrial **Facility ID:** 033-00429 **Pollutant:** CO

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions Tons/yr	Actual Emissions Lbs/day	Operating Schedule (Actual) Hrs/dy	Dys/wk	Wk/yr	Days/yr	TOSD Lbs/dy	Operating Schedule Hrs/dy	Start	End	Emissions Methods
5-0794 2M BTU/Hr Boiler		Nat. Gas	S	0.054	0.602	24	7	26	180					C2
			F											
5-0795 2M BTU/Hr Boiler		"	S	0.064	0.710	24	7	26	180					C2
			F											
6-0616 R.T.O.		"	S	0.192	1.533	16	5	50	250					C2
			F											
6-0614 Curing Ovens		"	S	Ø	Ø	Curing Ovens Not in Service								C7
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
Total				0.310	2.845									

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

1/09/08

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2008

Facility Name: Stone Industrial **Facility ID:** 033-00429 **Pollutant:** NOx

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions Tons/yr	Actual Emissions Lbs/day	Operating Schedule (Actual) Hrs/dy	Dys/wk	Wk/yr	Days/yr	TOSD Lbs/dy	Operating Schedule Hrs/dy	Start	End	Emissions Methods
5-0794 2m BTU/Hr Boiler		Nat. Gas	S	0.064	0.716	24	7	26	180	Boiler not in use				C2
			F											
5-0795 2m BTU/Hr Boiler		"	S	0.076	0.845	24	7	26	180	during TOSD time Period				C2
			F	~~0.076~~	~~0.845~~									
6-0616 R.T.O.		"	S	0.228	1.825	16	5	50	250	1.825	16	7 am	2 am	C2
			F	~~0.228~~	~~1.825~~									
6-0614 Curing Ovens		"	S	Ø	Ø	Curing Ovens Not in Service								C7
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
Total				0.368	3.386					1.825				

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

1/09/08

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2008

Facility Name: Stone Industrial **Facility ID:** 033-00429 **Pollutant:** SOx

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions Tons/yr	Actual Emissions Lbs/day	Operating Schedule (Actual) Hrs/dy	Dys/wk	Wk/yr	Days/yr	TOSD Lbs/dy	Operating Schedule Hrs/dy	Start	End	Emissions Methods
5-0794 2m BTU/Hr Boiler		Nat. Gas	S	0	0.004	24	7	26	180					C2
			F											
5-0795 2m BTU/Hr Boiler		"	S	0	0.005	24	7	26	180					C2
			F											
6-0616 R.T.O.		"	S	0.001	0.011	16	5	50	250					C2
			F											
6-0614 Curing Ovens		"	S	Ø	Ø	Curing Ovens Not in Service								C7
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
			S											
			F											
Total				0.001	0.020									

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

1/09/08

FORM 3: PM

EMISSIONS CERTIFICATION REPORT

Particulate Matter

Calendar Year: 2008

Facility Name: Stone Industrial

Facility ID: 033-00429

Pollutant: PM

Equipment Description/ Registration No.	SCC Number	Fuel		PM – Filterable		PM 10 – Filterable		PM 2.5 – Filterable		PM Condensable		Operation	Emissions Methods
				Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Days/yr	
5-0794		Nat.	S							0.005	0.054	180	C2
2MBTU/Hr Boiler		Gas	F										
5-0795		"	S							0.006	0.064	180	C2
5M BTU/Hr Boiler			F										
6-0616		"	S							0.017	0.139	250	C2
R.T.O			F										
6-0614			S										C7
Curing Ovens			F	Not	in	use							
			S										
			F										
			S										
			F										
			S										
			F										
			S										
			F										
			S										
			F										
			S										
			F										
Total										0.028	0.257		

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering Judgment

C5-User calculated based on a State or local agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

2/21/08

FORM 4:

TOXIC AIR POLLUTANTS

Calendar Year: 2008

EMISSIONS CERTIFICATION REPORT

Facility Name: Stone Industrial **Facility ID:** 033-00429 **Pollutant:** Methylenediphenyl Diisocyanate*

Equipment Description/ Registration Number[1]	Actual Emissions			Control Device**	% Efficiency
	Tons/yr	Lbs/day	Lbs/hr		
6-0616 R.T.O.	0.049	0.39	0.024	O	97
TOTALS					

[1]Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

* Please attach all calculations.

* See Attachment 1 for the minimum reporting values.

**Control Device
S = Scrubber
B = Baghouse
ESP = Electrostatic Precipitator
A = Afterburner
C = Condenser
AD = Adsorbtion
O = Other

O = Regenerative Thermal Oxidizer

1/09/08

FORM 5:

BILLABLE TOXIC AIR POLLUTANTS

EMISSIONS CERTIFICATION REPORT

Calendar Year: 2008

Facility Name: Stone Industrial **Facility ID#:** 033-00429

Chemical Name	CAS Number		Actual Emissions Tons/year	Actual Emissions Lbs/day	Actual Emissions Lbs/hr		Estimation Method
carbon disulfide	75-15-0	S					
		F					
carbonyl sulfide	463-58-1	S					
		F					
chlorine	7782-50-5	S					
		F					
cyanide compounds	57-12-5	S					
		F					
hydrochloric acid	7647-01-0	S					
		F					
hydrogen fluoride	7664-39-3	S					
		F					
methyl chloroform	71-55-6	S					
		F					
methylene chloride	75-09-2	S					
		F					
perchloroethylene	127-18-4	S					
		F					
phosphine	7803-51-2	S					
		F					
titanium tetrachloride	7550-45-0	S					
		F					
TOTALS							

S-Stack Emissions F-Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other mea
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering judgm
C5-User calculated based on a State or local agency f
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standards

This form to include only the eleven chemicals identi

PLEASE NOTE: Be sure to attach all data and calculations necessary to support the emissions figures shown above.

See Attachment 1 for minimum reporting values.

01/09/08

FORM 6: Greenhouse Gases

GREENHOUSE GAS AIR POLLUTANTS

Calendar Year: 2008

EMISSIONS CERTIFICATION REPORT

Facility Name: Stone Industrial **Facility ID:** 033-00429 **Pollutant:** _____ *

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
TOTALS			

[1]Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

1/15/08

STONE INDUSTRIAL – EMISSIONS CALCULATIONS FOR FY 2008
PLASTIC WINDING – V.O.C.

Adhesive used at winders: (G97) 89,480 lbs

89,480 x .647	(V.O.C. content) =		57,894 lbs V.O.C.
57,894 x .97	(efficiency of R.T.O) =		56,157 lbs V.O.C.
57,894 minus	56,157	equals	1,737 lbs V.O.C.
1,737 divided by 2,000 equals			0.868 tons V.O.C.
1,737 divided by 250 equals			6.95 lbs / day V.O.C.
6.95 divided by 16 equals			0.434 lbs / hour V.O.C.

Adhesive used at winders: (G95) 4,412 lbs

4,412 x .52	(V.O.C. content) =		2,294 lbs V.O.C.
2,294 x .97	(efficiency of R.T.O) =		2,225 lbs V.O.C.
2,294 minus	2,225	equals	69 lbs V.O.C.
69 divided by 2,000 equals			0.034 tons V.O.C.
69 divided by 250 equals			0.28 lbs / day V.O.C.
0.28 divided by 16 equals			0.017 lbs / hour V.O.C.

C-152 Solvent Blend 48,070 lbs

48,070 divided by 6.92 lbs/gal =			6,947
V.O.C. content 3.63 lbs/gal			
6,947 x 3.63 (V.O.C. content) =			25,216
25,216 x .97	(efficiency of R.T.O) =		24,459 lbs V.O.C.
25,216 minus	24,459	equals	756 lbs V.O.C.
756 divided by 2,000 equals			0.378 tons V.O.C.
756 divided by 250 equals			3.03 lbs / day V.O.C.
3.03 divided by 16 equals			0.189 lbs / hour V.O.C.

Tacline 3372: 24,209 lbs

24,209 divided by 8.09 lbs/gallon =			2,992.5 gallons
V.O.C. content 3.56 lbs/gallon			
2,992 x 3.56	(V.O.C. content) =		10,653 lbs V.O.C.
10,653 x .97	(efficiency of R.T.O) =		10,334 lbs V.O.C.
10,653 minus	10,334	equals	320 lbs V.O.C.
320 divided by 2,000 equals			0.160 tons V.O.C.
320 divided by 250 equals			1.28 lbs / day V.O.C.
1.28 divided by 16 equals			0.080 lbs / hour V.O.C.

Epon 1001: 350 lbs

350 x .20	(MEK content) =		70 lbs V.O.C.
70 x .97	(efficiency of R.T.O) =		68 lbs V.O.C.
70 minus	68	equals	2 lbs V.O.C.
2 divided by 2,000 equals			0.001 tons V.O.C.
2 divided by 250 equals			0.01 lbs / day V.O.C.
0.01 divided by 16 equals			0.001 lbs / hour V.O.C.

Mondur MR Lite (Methylene Diphenyl Diisocyanate) : 5,880 lbs

5,880 x .1748	equals	1,028 lbs V.O.C.

1,028 x .97	(efficiency of R.T.O) =		997 lbs V.O.C.
1,028 minus	997	equals	31 lbs V.O.C.
31 divided by 2,000 equals			0.015 tons V.O.C.
31 divided by 250 equals			0.12 lbs / day V.O.C.
0.12 divided by 16 equals			0.008 lbs / hour V.O.C.

Amsco Solvent 460: 2,301 lbs

2,301 x .97	(efficiency of R.T.O) =		2,232 lbs V.O.C.
2,301 minus	2,232	equals	69 lbs V.O.C.
69 divided by 2,000 equals			0.035 tons V.O.C.
69 divided by 250 equals			0.28 lbs / day V.O.C.
0.28 divided by 16 equals			0.017 lbs / hour V.O.C.

Capline 3697: 1,273 lbs

(Now only used once every other year or so depending on orders.)

1,273 divided by 8.04 lbs/gallon =			158.3 gallons
V.O.C. content 3.92 lbs/gallon			
158 x 3.92	(V.O.C. content) =		621 lbs V.O.C.
621 x .97	(efficiency of R.T.O) =		602 lbs V.O.C.
621 minus	602	equals	19 lbs V.O.C.
19 divided by 2,000 equals			0.009 tons V.O.C.
19 divided by 250 equals			0.07 lbs / day V.O.C.
0.07 divided by 16 equals			0.005 lbs / hour V.O.C.

TOTAL TUBE WINDING 6-0616	**Tons V.O.C. / Year**	**Lbs/Day**
Adhesive used at winders: (G97)	0.868	6.95
Adhesive used at winders: (G95)	0.034	0.28
C-152 Solvent Blend	0.378	3.03
Tacline 3372:	0.160	1.28
Epon 1001:	0.001	0.01
Mondur MR Lite (Methylene Diphenyl Diisocyanate) :	0.015	0.12
Amsco Solvent 460:	0.035	0.28
Capline 3697:	0.009	0.07
TOTALS:	1.501	12.01

STONE INDUSTRIAL – EMISSIONS CALCULATIONS FOR FY 2008
TOXIC CALCULATIONS

Methyl Ethyl Ketone (MEK):

In adhesive: (G97)	89,480 x .442		39,550.2 lbs
		Epon 1001	350 lbs
		Total	39,900 lbs

39,900 x .97	(efficiency of R.T.O) =		38,703 lbs
39,900 minus	38,703	equals	1,197 lbs
1,197 divided by 2,000 equals			0.599 tons
1,197 divided by 250 equals			4.79 lbs / day
4.79 divided by 16 equals			0.299 lbs / hour

In adhesive: (G95)	4,412 x .52		2,294.2 lbs
		Epon 1001	0 lbs
		Total	2,294 lbs

2,294 x .97	(efficiency of R.T.O) =		2,225 lbs
2,294 minus	2,225	equals	69 lbs
69 divided by 2,000 equals			0.034 tons
69 divided by 250 equals			0.28 lbs / day
0.28 divided by 16 equals			0.017 lbs / hour

In adhesive: (G97)	0.299 lbs / hour
In adhesive: (G95)	0.017 lbs / hour
Total	0.316 lbs / hour

BELOW MINIMUM REPORTING LEVELS

Toluene:

In adhesive: (G97 only)	89,480 x .205	18,343.4 lbs

18,343 x .97	(efficiency of R.T.O) =		17,793 lbs
18,343 minus	17,793	equals	550 lbs
550 divided by 2,000 equals			0.275 tons
550 divided by 250 equals			2.20 lbs / day
2.20 divided by 16 equals			0.138 lbs / hour

In C-152 Sovent Blend:	48,070 lbs V.O.C.

48,070 x .5 (toluene content) =			24,035 lbs
24,035 x .97	(efficiency of R.T.O) =		23,314 lbs
24,035 minus	23,314	equals	721 lbs
721 divided by 2,000 equals			0.361 tons
721 divided by 250 equals			2.88 lbs / day
2.88 divided by 16 equals			0.180 lbs / hour

TOTAL

In adhesive:	0.275 tons
In C-152 Sovent Blend:	0.361 tons
Total	0.636 tons

In adhesive:	0.138 lbs / hour

In C-152 Sovent Blend: 0.180 lbs / hour

Total 0.318 lbs / hour **BELOW MINIMUM REPORTING LEVELS**

Dibutyl Phtahalate

In Tacline form: 24,209 lbs Tacline

24,209 x .04 (Dibutyl Phtahalate content) =		968 lbs
968 x .97	(efficiency of R.T.O) =	939 lbs
968 minus	939 equals	29 lbs
29 divided by 2,000 equals		0.015 tons
29 divided by 250 equals		0.12 lbs / day
0.12 divided by 16 equals		0.007 lbs / hour

In Capline form: 1,273 lbs Capline

1,273 x .11 (Dibutly Phtalalate content) =		140 lbs
140 x .97	(efficiency of R.T.O) =	136 lbs
140 minus	136 equals	4 lbs
4 divided by 2,000 equals		0.002 tons
4 divided by 250 equals		0.02 lbs / day
0.02 divided by 16 equals		0.001 lbs / hour

TOTAL

In Tacline form: 0.015 tons
In Capline form: 0.002 tons
Total 0.017 tons

In Tacline form: 0.007 lbs / hour
In Capline form: 0.001 lbs / hour
Total 0.008 lbs / hour **BELOW MINIMUM REPORTING LEVELS**

Vinyl Acetate: 24,209 lbs Tacline

24,209 x .0271 (Vinyl Acetate content) =		656 lbs
656 x .97	(efficiency of R.T.O) =	636 lbs
656 minus	636 equals	20 lbs
20 divided by 2,000 equals		0.010 tons
20 divided by 250 equals		0.08 lbs / day
0.08 divided by 16 equals		0.005 lbs / hour **BELOW MINIMUM REPORTING LEVELS**

Methanol: 1,273 lbs Capline

1,273 x .48 (Methanol content) =		611 lbs
611 x .97	(efficiency of R.T.O) =	593 lbs
611 minus	593 equals	18 lbs
18 divided by 2,000 equals		0.009 tons
18 divided by 250 equals		0.07 lbs / day
0.07 divided by 16 equals		0.005 lbs / hour **BELOW MINIMUM REPORTING LEVELS**

Methylenediphenyl Diisocyanate (MR): 5,880 lbs

5,880 x .55 (MDI) =		3,234 lbs
3,234 x .97	(efficiency of R.T.O) =	3,137 lbs
3,234 minus	3,137 equals	97 lbs
97 divided by 2,000 equals		0.049 tons
97 divided by 250 equals		0.39 lbs / day
0.39 divided by 16 equals		0.024 lbs / hour

STONE INDUSTRIAL – EMISSIONS CALCULATIONS FOR FY 2008
NATURAL GAS CALCULATIONS

Building 2 Total: 60,835 CCF

Estimated Usage:		Registration No:	
R.T.O.	45,626 CCF	6-0616	
Ovens	0 CCF	6-0164	Ovens ceased operation in 2003
Boiler	15,209 CCF	5-0795	

Boiler (Building 2): 15,209 CCF

SO_x

15,209 divided by 10,000 x .6 =	0.91
0.91 divided by 180 days/year =	0.005 lbs/day
0.005 x 180 days divided by 2,000 =	0.000 tons/year

NO_x

15,209 divided by 10,000 x 100 =	152.09
152.09 divided by 180 days/year =	0.845 lbs/day
0.845 x 180 days divided by 2,000 =	0.076 tons/year

CO

15,209 divided by 10,000 x 84 =	127.75
127.75 divided by 180 days/year =	0.710 lbs/day
0.710 x 180 days divided by 2,000 =	0.064 tons/year

PM

15,209 divided by 10,000 x 7.6 =	11.56
11.56 divided by 180 days/year =	0.064 lbs/day
0.064 x 180 days divided by 2,000 =	0.006 tons/year

V.O.C.

15,209 divided by 10,000 x 5.5 =	8.36
8.36 divided by 180 days/year =	0.046 lbs/day
0.046 x 180 days divided by 2,000 =	0.004 tons/year

R.T.O.: 45,626 CCF

SO_x

45,626 divided by 10,000 x .6 =	2.74
2.74 divided by 250 days/year =	0.011 lbs/day
0.011 x 250 days divided by 2,000 =	0.001 tons/year

NO_x

45,626 divided by 10,000 x 100 =	456.26
456.26 divided by 250 days/year =	1.825 lbs/day
1.825 x 250 days divided by 2,000 =	0.228 tons/year

CO

45,626 divided by 10,000 x 84 =	383.26
383.26 divided by 250 days/year =	1.533 lbs/day
1.533 x 250 days divided by 2,000 =	0.192 tons/year

PM

45,626 divided by 10,000 x 7.6 =	34.68
34.68 divided by 250 days/year =	0.139 lbs/day
0.139 x 250 days divided by 2,000 =	0.017 tons/year

V.O.C.

45,626 divided by 10,000 x 5.5 =	25.09
25.09 divided by 250 days/year =	0.100 lbs/day
0.100 x 250 days divided by 2,000 =	0.013 tons/year

Building 3 Total: 12,893 CCF

Usage:		Registration No:
Boiler	12,893 CCF	5-0794

Boiler (Building 3): 12,893 CCF

SO_x

12,893 divided by 10,000 x .6 =	0.77
0.77 divided by 180 days/year =	0.004 lbs/day
0.004 x 180 days divided by 2,000 =	0.000 tons/year

NO_x

12,893 divided by 10,000 x 100 =	128.93
128.93 divided by 180 days/year =	0.716 lbs/day
0.716 x 180 days divided by 2,000 =	0.064 tons/year

CO

12,893 divided by 10,000 x 84 =	108.30
108.30 divided by 180 days/year =	0.602 lbs/day
0.602 x 180 days divided by 2,000 =	0.054 tons/year

PM

12,893 divided by 10,000 x 7.6 =	9.80
9.80 divided by 180 days/year =	0.054 lbs/day
0.054 x 180 days divided by 2,000 =	0.005 tons/year

V.O.C.

12,893 divided by 10,000 x 5.5 =	7.09
7.09 divided by 180 days/year =	0.039 lbs/day
0.039 x 180 days divided by 2,000 =	0.004 tons/year

CO_2 120,000 EF x 1.2893 / 180 = 859.53 lb/day

PM cond 5.7 x 1.2893/180 = 0.041

PM filt 1.9 x 1.2893/180 = 0.014

CH_4 23 x 1.2893/180 = 0.016

N_2O 2.2 x 1.2893/180 = 0.016

x discussed reporting of greenhouse gas emissions with Michael Matthews 04/22

3/23/2009

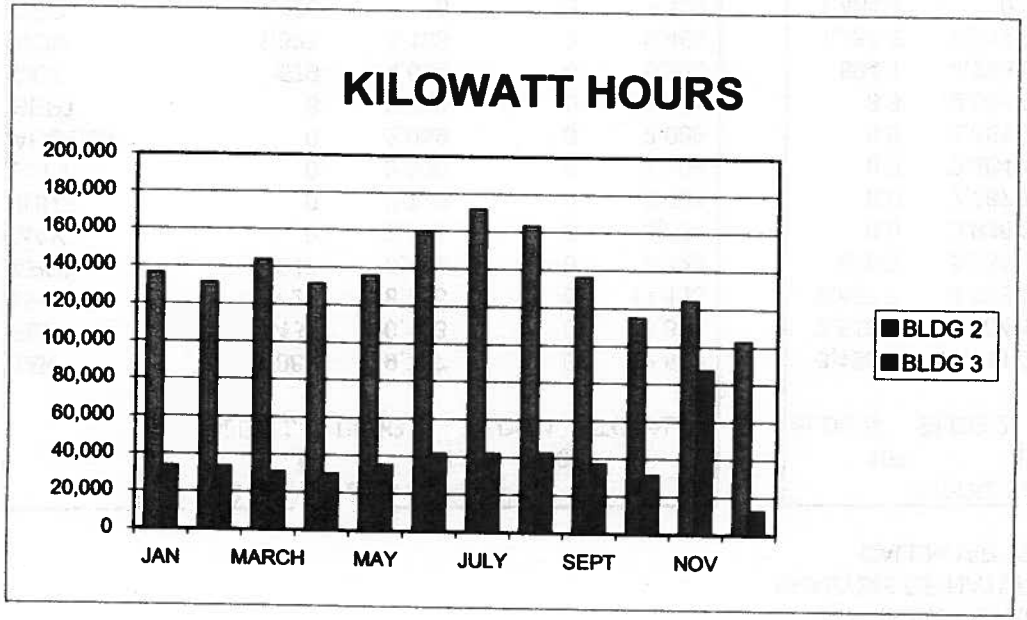
PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION
ANALYSIS OF ELECTRICITY USAGE
CALENDAR YEAR 2008

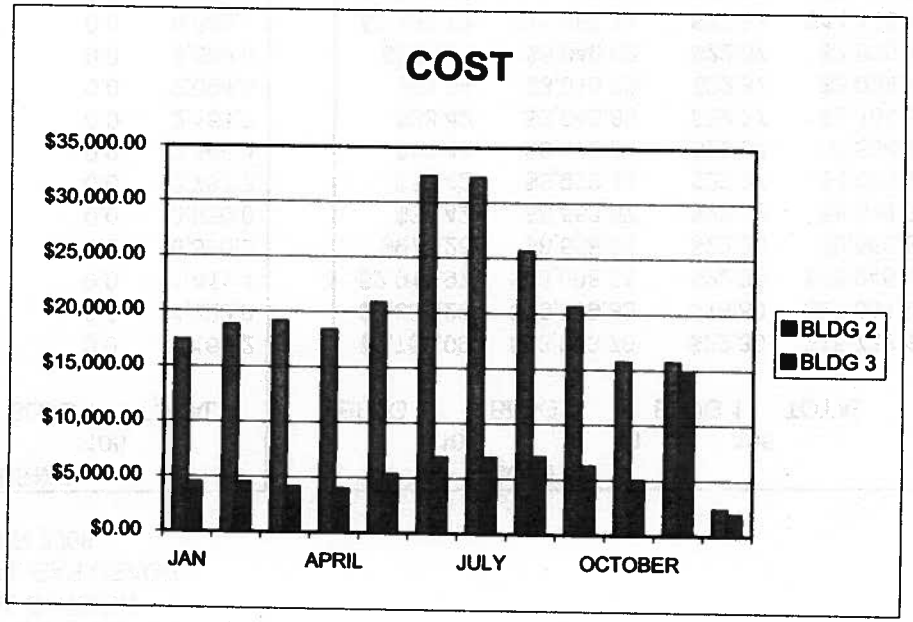
KILOWATT HOURS USED

	ACCT 3454306220 BLDG 2	ACCT 345306006 BLDG 3	TOTAL
JAN	135,953	33,600	169,553
FEB	131,049	33,600	164,649
MARCH	143,402	30,600	174,002
APRIL	130,880	29,700	160,580
MAY	135,520	35,100	170,620
JUNE	159,520	41,400	200,920
JULY	171,584	41,700	213,284
AUGUST	162,979	42,300	205,279
SEPT	135,856	36,900	172,756
OCTOBER	114,755	31,200	145,955
NOV	124,025	87,300	211,325
DEC	102,575	12,600	115,175
TOTALS	1,648,098	456,000	2,104,098

COST

ACCT 3454306220 BLDG 2	ACCT 3454306006 BLDG 3	TOTAL
$17,388.09	$4,448.30	$21,836.39
$18,754.45	$4,490.72	$23,245.17
$19,091.73	$4,085.49	$23,177.22
$18,384.56	$3,960.59	$22,345.15
$20,873.35	$5,318.23	$26,191.58
$32,372.88	$6,878.06	$39,250.94
$32,271.98	$6,892.03	$39,164.01
$25,645.51	$7,030.64	$32,676.15
$20,640.89	$6,254.89	$26,895.78
$15,728.23	$4,992.27	$20,720.50
$15,707.69	$14,828.48	$30,536.17
$2,383.12	$1,949.92	$4,333.04
$239,242.48	$71,129.62	$310,372.10





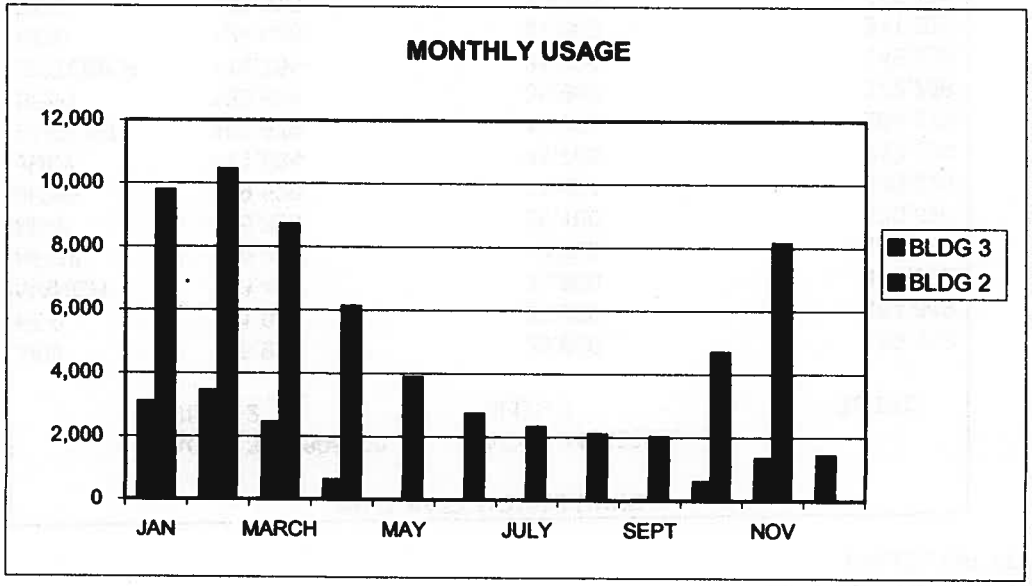
cc: D. Hooe, E. Strong, A/P File

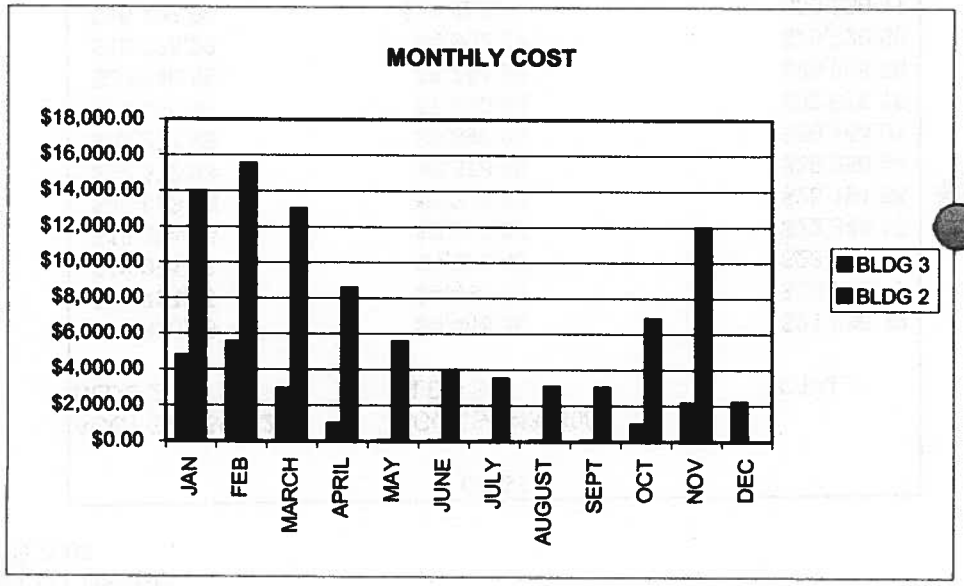
CRH

3/23/2009

PRECISION PRODUCTS GROUP, INC.
STONE INDUSTRIAL DIVISION
ANALYSIS OF NATURAL GAS USAGE
CALENDAR YEAR 2008

	CCF GAS USED				TOTAL THERMS				COST			
	107	11	105		107	11	105		107	11	105	
	BLDG 3	BLDG 2	BLDG 1	TOTAL	BLDG 3	BLDG 2	BLDG 1	TOTAL	BLDG 3	BLDG 2	BLDG 1	TOTAL
JAN	3,081	9,767	0	12,848	3,158.0	10,011.2	0.0	13,169.2	$4,756.09	$13,953.70	$22.36	$18,732.15
FEB	3,431	10,443	0	13,874	3,516.8	10,704.1	0.0	14,220.9	$5,505.29	$15,509.83	$16.80	$21,031.92
MARCH	2,427	8,706	0	11,133	2,487.7	8,923.7	0.0	11,411.4	$2,914.97	$13,008.51	$22.36	$15,945.84
APRIL	617	6,109	0	6,726	629.3	6,231.2	0.0	6,860.5	$976.26	$8,558.24	$22.36	$9,556.86
MAY	0	3,874	0	3,874	0.0	3,936.0	0.0	3,936.0	$38.42	$5,553.57	$22.36	$5,614.35
JUNE	0	2,725	0	2,725	0.0	2,787.7	0.0	2,787.7	$38.42	$3,972.44	$22.37	$4,033.23
JULY	0	2,309	0	2,309	0.0	2,364.4	0.0	2,364.4	$38.42	$3,473.94	$22.37	$3,534.73
AUGUST	0	2,089	0	2,089	0.0	2,151.7	0.0	2,151.7	$38.42	$3,043.88	$22.37	$3,104.67
SEPT	8	2,006	0	2,014	8.3	2,086.2	0.0	2,094.5	$51.64	$3,010.72	$22.37	$3,084.73
OCT	579	4,674	0	5,253	594.1	4,795.5	0.0	5,389.6	$958.41	$6,849.82	$22.37	$7,830.60
NOV	1,327	8,133	0	9,460	1,356.2	8,311.9	0.0	9,668.1	$2,133.73	$11,957.71	$22.37	$14,113.81
DEC	1,423	0	0	1,423	1,461.4	0.0	0.0	1,461.4	$2,173.64	$0.00	$22.37	$2,196.01
TOTALS	12,893	60,835	0	73,728	13,211.8	62,303.6	0.0	75,515.4	$19,623.71	$88,892.36	$262.83	$108,778.90





cc: D. Hooe, E. Strong, A/P File

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Attachment 1
TOXIC AIR POLLUTANTS

Pollutant	PLANT LEVEL THRESHOLDS	
	Round to Nearest:	
	Lbs / hour	Tons/year
Acetaldehyde	0.1	0.1
Acetamide	0.1	1
Acetonirile	1	1
Acetophenone	0.1	1
2-Acetylaminofluorene	0.01	0.01
Acrolein	0.001	0.01
Acrylamide	0.0001	0.0001
Acrylic Acid	0.1	0.1
Acrylonitrile	0.01	0.01
Allyl chloride	0.01	0.1
4-Aminobiphenyl	0.01	0.1
Ammonia	0.1	1
Aniline	0.1	0.1
o-Anisidine	0.001	0.01
Antimony & compounds	0.001	0.01
Arsenic & compounds	0.0001	0.0001
Benzene	0.01	0.1
Benzidene	0.01	0.00001
Benzotrichloride	0.01	0.0001
Benzyl chloride	0.01	0.1
Beryllium & compounds	0.00001	0.0001
Biphenyl	0.01	0.1
Bis (2-ethylhexyl) phthalate	0.01	0.1
Bis (chloromethyl) ether	0.00001	0.00001
Bromoform	0.01	0.1
1,3-Butadiene	0.01	0.001
Cadmium & compounds	0.0001	0.0001
Calcium cyanamide	0.001	0.01
Captan	0.01	0.1
Carbaryl	0.01	0.1
Carbon disulfide	0.1	1
Carbon tetrachloride	0.1	0.01
Carbonyl sulfide	0.1	1
Catechol	0.1	1
Chloramben	0.1	1
Chlordane	0.001	0.01
Chlorine	0.01	0.1
Chlorine dioxide	0.001	0.01
Chloroacetic acid	0.01	0.1
2-Chloroacetophenone	0.001	0.01
Chlorobenzene	0.1	1
Chlorobenzilate	0.01	0.1
Chloroform	0.1	0.01

***Total facility emissions below these levels are not required to be reported.**

Attachment 1
TOXIC AIR POLLUTANTS

Pollutant	PLANT LEVEL THRESHOLDS Round to Nearest*	
	Lbs./hour	Tons/year
Chloromethyl methyl ether	0.01	0.1
Chloroprene	0.1	1
Chromium (Elemental) Compounds	0.001	0.01
Chromium III Compounds	0.001	0.01
Chromium VI Compounds	0.001	0.00001
Cobalt & compounds	0.0001	0.001
Coke oven emissions	0.001	0.001
Copper	0.001	0.01
Cresol/Cresylic acid	0.1	1
0-Cresol	0.1	1
m-Cresol	0.1	1
p-Cresol	0.1	1
Cumene	1	10
Cyanide Compounds	0.01	0.1
2,4-D (including salts and esters)	0.1	0.1
DDE	0.01	0.1
Diazomethane	0.001	0.01
Dibenzofuran	0.1	1
1,2-Dibromo-3-chloropropane	0.01	1
Dibutyl phthalate	0.01	0.1
1,4-Dichlorobenzene(P)	1	0.1
3,3'-Dichlorobenzidine	0.001	0.001
Dichloroethyl ether	0.1	1
1,2-Dichloropropane	1	10
1,3-Dichloropropene	0.01	0.01
Dichlorvos	0.01	0.01
Dieldrin	0.001	0.01
Diethanolamine	0.01	0.1
Diethyl sulfate	0.01	0.1
3,3'-Dimethoxybenzidine	0.1	0.1
4-Dimethylaminoazobenzene	0.01	0.01
N,N-Dimethylaniline	0.1	1
3,3'-Dimethylbenzidine	0.1	0.1
Dimethylcarbamoyl chloride	0.01	0.1
N,N-Dimethylformamide	0.1	1
1,1-Dimethylhydrazine	0.0001	0.0001
Dimethyl phthalate	0.01	0.1
Dimethyl sulfate	0.001	0.01
4,6-Dinitro-o-cresol (including salts)	0.001	0.01
2,4-Dinitrophenol	0.001	0.001
2,4-Dinitrotoluene	0.01	0.1
1,4-dioxane	1	0.1
1,2-Diphenylhydrazine	0.01	0.001

***Total facility emissions below these levels are not required to be reported.**

Attachment 1
TOXIC AIR POLLUTANTS

Pollutant	PLANT LEVEL THRESHOLDS Round to Nearest	
	Lbs/hour	Tons/year
Epichlorohydrin	0.01	0.1
1,2-Epoxybutane	0.01	0.01
Ethyl arcylate	0.1	0.01
Ethyl benezene	1	10
Ethyl carbamate	0.01	0.1
Ethyl chloride	0.001	0.01
Ethylene dibromide	1	0.001
Ethylene dichloride	0.1	0.01
Ethylene glycol	1	1
Ethyleneimine	0.01	0.01
Ethylene oxide	0.01	0.001
Ethylene thiourea	0.1	0.01
Ethylidene dichloride	1	10
Formaldehyde	0.001	0.01
Glycol ethers	0.1	1
Heptachlor	0.0001	0.001
Hexachlorobenzene	0.00001	0.001
Hexachlorobutadiene	0.001	0.01
1,2,3,4,5,6-Hexachlorocyclyhexane (including all stereo isomers)	0.001	0.01
Hexachlorocyclopentadiene	0.001	0.001
Hexachloroethane	0.1	0.1
Hexamethylene diisocyanate	0.0001	0.001
Hexamethylphosphoramide	0.1	0.1
n-Hexane	1	10
Hydrazine	0.001	0.001
Hydrochloric acid	0.1	0.1
Hydrogen fluoride	0.01	0.1
Hydroquinone	0.01	0.1
Isophorone	0.1	1
Lead & compounds	0.0001	0.001
Maleic anhydride	0.01	0.01
Manganese & compounds	0.001	0.01
Mercury & compounds	0.0001	0.001
Methanol	1	10
Methoxychlor	0.1	0.1
Methyl bromide	0.01	0.01
Methyl chloride	0.1	0.1
Methyl chloroform	10	10
Methyl ethyl ketone (MEK)	10	10
Methyl hydrazine	0.0001	0.001
Methyl iodide	0.1	0.1
Methyl isobutyl ketone (MIBK)	1	10

***Total facility emissions below these levels are not required to be reported.**

Attachment 1
TOXIC AIR POLLUTANTS

Pollutant	PLANT LEVEL THRESHOLDS Round to Nearest Lbs/hour	Tons/year
Methyl isocyanate	0.0001	0.001
Methyl methacrylate	1	10
Methyl tert-butyl ether (MTBE)	1	10
4,4'-Methylenebis(2-chloroaniline)	0.001	0.01
Methylene chloride	1	1
4,4'-Methylenediphenyl diisocyanate (MDI)	0.0001	0.001
4,4'-Methylenedianiline	0.01	0.01
Naphthalene	0.1	1
Nickel & compounds	0.001	0.001
Nitrobenzene	0.01	0.1
4-Nitrobiphenyl	0.1	0.1
4-Nitrophenol	0.01	0.01
2-Nitropropane	0.1	0.0001
N-Nitroso-N-methylurea	0.001	0.01
N-Nitrosodimethylamine	0.001	0.00001
N-Nitrosomorpholine	0.01	0.01
Parathion	0.001	0.001
Pentachloronitrobenzene	0.001	0.01
Pentachlorophenol	0.001	0.01
Phenol	0.1	1
p-Phenylenediamine	0.001	0.001
Phosgene	0.001	0.01
Phosphine	0.001	0.01
Phosphorus	0.001	0.001
Phthalic anhydride	0.1	0.1
PCB	0.01	0.001
POM (PAHs)[a]	As Individual Pollutant (See Below)	
1,3-Propane sultone	10	10
Beta-Propiolactone	0.01	0.1
Propionaldehyde	0.1	0.1
Propoxur	0.001	0.01
Propylene oxide	0.1	0.1
1,2-Propylenimine	0.01	0.1
Quinoline	0.01	0.1
Quinone	0.001	0.01
Selenium & Compounds	0.001	0.01
Styrene	1	1
Stryene oxide	0.1	0.1
2,3,7,8,-TCDF/2,3,7,8-TCDD[b]	0.0000001	0.00000001
1,1,2,2-Tetrachloroethane	0.1	0.1
Tetrachloroethylene	1	10
Titanium Tetrachloride	0.01	0.1
Toluene	1	10

***Total facility emissions below these levels are not required to be reported.**

Attachment 1
TOXIC AIR POLLUTANTS

Pollutant	PLANT LEVEL THRESHOLDS Round To Nearest: Lbs./hour	Tons/year
Toluene-2,4-damine	0.0001	0.0001
2,4-Toluene Diisocyanate	0.0001	0.01
o-Toluidine	0.1	0.01
Toxaphene	0.001	0.001
1,2,4-Trichlorobenzene	0.1	1
1,1,2-Trichloroethane	0.1	1
Trichloroethylene	1	10
2,4,5-Trichlorophenol	0.01	0.1
2,4,6-Trichlorophenol	0.01	0.1
Triethylamine	0.01	0.1
Trifluranlin	0.1	0.1
2,2,4-Trimethylpentane	0.1	1
Vinyl acetate	0.1	1
Vinyl bromide	0.1	1
Vinyl chloride	0.1	0.01
Vinylidenen chloride	0.1	1
Xylenes	1	10
o-Xylene	1	10
m-Xylene	1	10
p-Xylene	1	10
Zinc compounds	0.01	0.1
[a]POM includes:		
Acenaphthene	0.001	0.01
Acenaphthylene	0.01	0.1
Anthracene	0.001	0.01
Benz(a)anthracene	0.001	0.001
Benzo(a)pyrene	0.001	0.0001
Benzo(b)fluoranthene	0.1	0.001
Benzo(ghi)perylene	0.001	0.01
Benzo(k)fluoranthene	0.01	0.01
Chrysene	0.001	0.01
Dibenzo(a,h)anthracene	0.0001	0.0001
Fluoranthene	0.1	0.1
Fluorene	0.001	0.01
Indeno(1,2,3-cd)pyrene	0.001	0.001
Naphthalene	0.1	1
Phenanthrene	0.01	0.01
Pyrene	0.001	0.01
[b]2,3,7,8-Tetrachlorodibenzofuran/ 2,3,7,8-Tetrachlorodibenzo-p-dioxin. Inventory these HAPS as toxic equivalents (TEQs)		

***Total facility emissions below these levels are not required to be reported.**

June 1, 2009

Operating Permit under Air and Radiation Management Administration

0

KEEP PERMIT AT SITE **CONTROL NO. B-** 02270

State of Maryland

Martin O' Malley
Governor

Shari T. Wilson
Secretary

DEPARTMENT OF THE ENVIRONMENT

Air and Radiation Management Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

[ ] Construction Permit [X] Operating Permit

PERMIT NO.	033-0429	DATE ISSUED	June 1, 2009
PERMIT FEE	To Be Paid in Accordance with COMAR 26.11.02.19B	EXPIRATION DATE	May 31, 2014

LEGAL OWNER & ADDRESS

Stone Industrial Division
Precision Products Group, Inc.
9207 51st Avenue
College Park, MD 20740
Attn: Mr. Michael Matthews

SITE

Stone Industrial Division
Precision Products Group, Inc.
9207 51st Avenue
College Park MD 20740
PRINCE GEORGE'S County
AI# - 3188

SOURCE DESCRIPTION

One (1) paper and plastic tube manufacturing facility that includes: (a) two (2) small boilers, each fired with natural gas only, that are used generate space heat only; (b) twelve (12) mylar winders that produce spiral wound plastic (mylar) tubing; (c) two (2) small solvent recovery units; and (d) one (1) Reeco® regenerative thermal oxidizer that controls emissions of volatile organic compounds (VOC) from the mylar winding and solvent recovery operations.

This source is subject to the conditions described on the attached pages.

Program Manager

Director, Air and Radiation Management Administration

(NOT TRANSFERABLE)

INDEX

Part A – General Provisions
Part B – Applicable Regulations
Part C – Operating Conditions
Part D – Monitoring, Record Keeping and Reporting

This permit-to-operate incorporates requirements for the following registered installations:

ARMA Registration Number	Description	Date of Installation
033-0429-5-0794	One (1) Preferred Boiler 2.5-MMBtu/hr boiler, fired with natural gas only, used for space heat only	1954
033-0429-5-0795	One (1) Cleaver Brooks 5.25-MMBtu/hr boiler, fired with natural gas only, used for space heat only	1954
033-0429-6-0616	Twelve (12) Plastic (Mylar) Tube Production Winders that exhaust to a 2.68-MMBtu/hr Reeco® Regenerative Thermal Oxidizer (RTO) for control of emissions of volatile organic compounds (VOC)	Winders → 1953 RTO →1993
033-0429-6-0771	Two (2) LS 55 Solvent Recovery Stills that exhaust to the facility's RTO	10/1994 & 08/2000

Part A – General Provisions

(1) The application (ARMA Form 26) received at the Department on April 24, 2009 for the renewal of the Permittee's permit-to-operate is incorporated into this permit by reference. If there are any conflicts between representations in the application and representations in this permit, the representations in the permit shall govern. Estimates of dimensions, volumes, emissions rates, operating rates, feed rates and hours of operation included in the application for renewal do not constitute enforceable numeric limits beyond the extent necessary for compliance with applicable requirements.

(2) Upon presentation of credentials, representatives of the Maryland Department of the Environment ("MDE" or the "Department:") and the Prince George's County Health Department shall at any reasonable time be granted, without delay and without prior notification, access to the Permittee's property and permitted to:

(a) determine compliance with the requirements of this permit and any applicable regulations;

(b) sample, as necessary to determine compliance with requirements of this permit and applicable regulations, any materials stored or processed on site, any waste materials, and any discharge into the environment;

(c) inspect any monitoring equipment required by applicable regulations or by any permit issued by the Department's Air and Radiation Management Administration;

(d) review and copy any records, including all documents required to be maintained by this permit and by applicable regulations, relevant to the Department's determination of compliance with an air pollution control requirement; and

(e) obtain any photographic documentation or evidence necessary to determine compliance with the requirements of this permit and applicable regulations.

(3) If any provision of this permit is declared by proper authority to be invalid, the remaining provisions of the permit shall remain in effect.

(4) Nothing in this permit authorizes the violation of any rule or regulation or the creation of a nuisance or air pollution.

Part B – Applicable Regulations

(1) This source is subject to all applicable federal air pollution control requirements.

(2) This source is subject to all applicable federally enforceable State air pollution control requirements including, but not limited to, the following regulations:

(a) COMAR 26.11.01.07C, which requires that the Permittee report to the Department occurrences of excess emissions.

(b) COMAR 26.11.02.09A, which requires that the Permittee obtain a permit-to-construct if an installation is to be modified in manner that would cause a change in the quantity, nature, or characteristics of emissions referenced in the permit-to-construct issued for that installation.

(c) COMAR 26.11.06.02C(2), which prohibits visible emissions other than uncombined water.

(d) COMAR 26.11.09.05A(2), which prohibits visible emissions other than water in uncombined form from fuel burning equipment.

(e) COMAR 26.11.19.02B(2)(b)(ii), which allows the Permittee to use a control device that, when tested by approved test methods, results in an emissions reduction that would be achieved by application of low-VOC adhesives and resins that comply with COMAR 26.11.19.15C(3).

(f) COMAR 26.11.19.02I, which requires that the Permittee establish in writing and implement facility-wide "good operating practices" designed to minimize emissions of VOC.

(g) COMAR 26.11.19.16, which requires that the Permittee implement a VOC leak detection and repair program designed to minimize unintended emissions of VOC from process equipment and components, e.g., in-process vessels, storage tanks, pumps, compressors, valves, flanges and other pipeline fittings, pressure relief valves, process drains, and open-ended pipes.

(3) This source is subject to all applicable State-only enforceable air pollution control requirements including, but not limited to, the following regulations:

(a) COMAR 26.11.02.13A(28), which requires that the Permittee maintain and renew as required a valid State permit-to-operate issued by the Department.

(b) COMAR 26.11.02.14D, which requires that the Permittee submit to the Department not later than 60 days prior to expiration of this permit a completed application for renewal.

(c) COMAR 26.11.02.19C & D, which require that the Permittee submit to the Department annual certifications of emissions, and that the Permittee maintain sufficient records to support the emissions information presented in such submittals.

(d) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

(e) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

(f) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions would unreasonably endanger human health.

Part C – Operating Conditions

(1) The Permittee shall maintain and operate all installations and associated air pollution control equipment so as to assure full and continuous compliance with all applicable air pollution control regulations and permit conditions.

(2) The Permittee shall properly maintain, calibrate, and operate all control panel instrumentation and all devices employed to monitor performance of the facility's air pollution control devices.

(3) Unless the Permittee obtains from the Department written approval otherwise the Permittee shall burn only natural gas in the facility's two (2) boilers (ARMA registration numbers 033-0429-5-0794 and 033-0429-5-0795).

(4) The Permittee shall vent all process exhaust gases from the following installations through the facility's Reeco® regenerative thermal oxidizer before discharge to atmosphere:

(a) all mylar winders as registered under ARMA registration number 033-0429-6-0616; and

(b) two (2) solvent recovery units as registered under ARMA registration number 033-0429-6-0771.

(5) Whenever process exhaust gases containing VOC are vented to the facility's Reeco® regenerative thermal oxidizer (RTO) the Permittee shall maintain the temperature of the combustion zone of the RTO at a minimum of 1400 °F, and shall limit the volumetric flow rate of the process exhaust gases to the RTO such that the residence time of such gases in the combustion zone is at least 0.5 second.

(6) In accordance with COMAR 26.11.19.02I, the Permittee shall implement "good operating practices" designed to minimize emissions of VOC to the atmosphere.

(a) Where applicable, "good operating practices" shall include, at a minimum:

(i) Provisions for training operators with regard to practices, procedures, and maintenance requirements that are consistent with equipment manufacturers' recommendations, and with requirements dictated by the Permittee's experiences with operation of equipment. The training shall include material concerning proper maintenance procedures for air pollution control equipment;

(ii) Maintenance of covers on containers and other vessels that are not in use and that contain VOC or VOC-bearing materials;

(iii) Scheduling operations as much as practical to minimize color changes and other material changes when applying VOC-bearing materials by spray application;

(iv) Where practical, using high-volume-low-pressure (HVLP) spray applicators or other high efficiency application methods for spray application of VOC-bearing materials; and

(v) Mixing and blending VOC–bearing materials as much as practical in closed containers, and implementing preventive measures designed to minimize emissions from products that contain VOC.

(b) "Good operating practices" shall be established in writing, shall be made available to the Department upon request, and shall be either included as part of an operator training program or posted where clearly visible to operators.

(c) The Permittee shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process equipment and coating application equipment, including containers, vessels, tanks, lines, spray application devices, and pumps. Reasonable precautions for equipment cleanup shall include, at a minimum:

(i) Storing all waste materials, including VOC-contaminated cloth and paper, in closed containers;

(ii) For frequently cleaned equipment, preparing written standard operating procedures that include, wherever practical, provisions for using non-VOC or low-VOC cleaning agents, and procedures designed to minimize the quantities of VOC-bearing cleaning materials used;

(iii) Where practical, using enclosed spray-applicator cleaning methods, VOC-recycling systems and other spray-applicator cleaning methods designed to reduce or eliminate VOC emissions; and

(iv) Where practical, using detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment.

(d) With regard to storage and transfer of VOC, the Permittee shall, at a minimum:

(i) Install conservation vents, or other vapor control measures designed to minimize standing losses, on all storage tanks with a capacity of 2000 gallons or more in VOC service; and

(ii) For stationary storage tanks with capacities greater than 10,000 gallons and less than 40,000 gallons that store VOC or VOC-bearing materials, excluding gasoline, with vapor pressures greater than 1.5 psia, use vapor balance, vapor control lines, or other vapor control measures, whenever VOC are transferred from tank trucks into such tanks.

(7) In accordance with COMAR 26.11.19.16, the Permittee shall visually inspect all equipment and components in VOC service for leaks at least once per calendar month. If leaks are detected, the Permittee shall:

(a) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date that the leak was discovered, and the identity of the person who discovered the leak. The tag shall remain in place until the leak has been repaired;

(b) Initiate immediate action to repair all observed VOC leaks that can be repaired within 48 hours;

(c) Repair all other leaking components within fifteen (15) days of discovery. If a replacement part is needed, the part shall be ordered within three (3) days of discovery of the leak, and the leak shall be repaired within 48 hours of receipt of the part; and

(d) Maintain a supply of components and component parts, such as seals, gaskets, packing and pipe fittings, that are known to wear or corrode, or that otherwise need to be routinely replaced.

(8) In accordance with COMAR 26.11.19.16D, leaking components that cannot be repaired as required because they are inaccessible, or that cannot be repaired during operation of an installation, shall be identified in a log and included in the facility's maintenance schedule for repair during the next outage of the installation.

Part D – Monitoring, Record Keeping and Reporting

(1) Whenever process exhaust gases containing VOC are vented to the Reeco® regenerative thermal oxidizer (RTO) the Permittee shall continuously monitor and record the flow rate of exhaust gases to, and the temperature of such exhaust gases in, the combustion zone of the RTO.

(2) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:

(a) All required recordation of the flow rate of exhaust gases to, and the temperature of such exhaust gases in, the combustion zone of the Reeco® regenerative thermal oxidizer;

(b) All written descriptions of "good operating practices" designed to minimize emissions of VOC; and

(c) VOC leak detection and repair logs that include identification of the persons who conducted the leak detection inspections, the dates on which the inspections were conducted, the findings during the inspections, a listing by tag identification number and a description of all leaks discovered, and the date and nature of all leak repairs effected.

(3) The Permittee shall maintain at the facility for at least five (5) years records necessary to support annual certifications of emissions and demonstrations of compliance for toxic air pollutants. Such records shall include, if applicable, the following:

(a) mass emissions rates for each regulated pollutant, and the total mass emissions rate for all regulated pollutants for each registered source of emissions;

(b) accounts of the methods and assumptions used to quantify emissions;

(c) all operating data, including operating schedules and production data, that were used in determinations of emissions;

(d) amounts, types, and analyses of all fuels used;

(e) any records, the maintenance of which is required by this permit or by State or federal regulations, that pertain to the operation and maintenance of continuous emissions monitors, including:

(i) all emissions data generated by such monitors;

(ii) all monitor calibration data;

(iii) information regarding the percentage of time each monitor was available for proper service; and

(iv) information concerning any equipment malfunctions;

(f) Information concerning operation, maintenance, and performance of air pollution control equipment and compliance monitoring equipment, including:

(i) identifications and descriptions of all such equipment;

(ii) operating schedules for each item of such equipment;

(iii) accounts of any significant maintenance performed;

(iv) accounts of all malfunctions and outages; and

(v) accounts of any episodes of reduced efficiency;

(g) limitations on source operation or any work practice standards that significantly affect emissions; and

(h) other relevant information as required by the Department.

(4) The Permittee shall submit to the Department by April 1 of each year during the term of this permit a certification of emissions for the previous calendar year. The certifications shall be prepared in accordance with requirements, as applicable, adopted under COMAR 26.11.01.05 – 1 and COMAR 26.11.02.19D.

(a) Certifications of emissions shall be submitted on forms obtained from the Department.

(b) A certification of emissions shall include mass emissions rates for each regulated pollutant and the total mass emissions rate for all regulated pollutants for each of the Permittee's registered sources of emissions.

(c) The person responsible for a certification of emissions shall certify the submittal to the Department in the following manner:

"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 information submitted 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."

(5) The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. Such analysis shall include either:

(a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

(b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

(6) The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Management Administration.

RECEIVED
APR 24 2009

Target Due Date: 05/15/09

MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Blvd ● Baltimore, Maryland 21230
(410) 537-3230 ● 1-800-633-6101 ● www.mde.state.md.us

Air and Radiation Management Administration ● Air Quality Permits Program

APPLICATION FOR PERMIT TO OPERATE PROCESS EQUIPMENT

1. Premise Identification: AI# 3188

Stone Industrial Division, Precision Product Group, Inc.
Premise Name or Identification

033-00429
Premise Number

9207 51st Avenue — College Park — Maryland — 20740 — P.G.
Premise Address — City — State — Zip — County

2. Equipment Identification

☐ Single Installation ☑ Process Line ☐ Identical Units and No._____

3. Describe Equipment and its Major Function. State Type and Size of Equipment and Type Control Device Associated with this Equipment Only.

- Twelve Plastics winders that produce spiral wound plastic tubing.
- Two small solvent recovery units

The equipment is controled by a regenerative thermal oxidizer (RTO)

Signature Michael Matthews

Title Mfg. Resource Coordinator

Date 4/23/09

Form number: 26
Revision date: 09/27/2002
TTY Users 1-800-735-2258

Recycled Paper

MARYLAND DEPARTMENT OF THE ENVIRONMENT
MDE 1800 Washington Boulevard • Baltimore MD 21230
410-537-3000 • 1-800-633-6101

Martin O'Malley
Governor

Anthony G. Brown
Lieutenant Governor

Shari T. Wilson
Secretary

Robert M. Summers, Ph.D.
Deputy Secretary

MAY 26 2009

Mr. Michael Matthews, Mfg. Resource Coordinator
Stone Industrial Division
Precision Products Group, Inc.
9207 51st Avenue
College Park, MD 20740

Dear Mr. Matthews:

Enclosed is the renewal of the State permit-to-operate for the Precision Products Group, Inc., Stone Industrial Division facility located in College Park in Prince George's County, Maryland. The permit, which has a 5-year term that will expire on May 31, 2014, contains both general conditions that apply to all permit-to-operate holders in Maryland, and specific conditions, which apply to your facility's particular operations.

Please be reminded that an emissions-based permit fee must be paid annually and is due by the anniversary date of the permit. The Department will bill you prior to the anniversary date for the annual fee.

If you have any questions regarding the issuance of this permit or the annual fee, please contact Mr. Ross Oliver of my staff at (410) 537-3931.

Sincerely,

Karen G. Irons

Karen G. Irons, P.E., Administrator
Air Quality Permits Program
Air & Radiation Management Administration

KGI/aw

Enclosure

cc: Laramie Daniel with copy of permit
Prince George's County Health Department

STATE PERMIT-TO-OPERATE

P/O PACKAGE SIGN-OFF SHEET

COMPANY NAME: Stone Industrial Division, Precision Products Group, Inc.

PERMIT NO.: 033 - 00429

	INITIAL & DATE
P/O Package Complete & Draft Permit Prepared:	Ross Oliver RAO 4/30/2009
P/O Package & Draft Permit Approved by Section Head:	Suna Sariscak 5/1/09
Draft Permit Approved by Compliance Program:	5/4/09 5/6/09 05/08/09
Draft Permit Approved by AQP Division Chief:	Justin Hsu 5/4/09
Draft Permit Conditions Shared With Facility:	

_____ To Program Administrator for Signature
_____ To Administration Director for Signature

Check Off Sheets Attached:

✓ Control Sheet or Memo

✓ Draft AMA-1

✓ Draft Permit Conditions

✓ P/O Application

✓ Cover Letter

Control Sheet For

STATE PERMIT-TO-OPERATE

Permit no.: 033 – 00429

Company name: Stone Industrial Division, Precision Products Group, Inc.

Permit type (Renewal/Amendment/Temporary): State PTO Renewal

Installation description: Facility that manufactures spiral wound paper and plastic tubing

Inspection date: December 9, 2008

Inspectors: Janay Wheeler, Scott Thompson

Has company complied with all permit-to-construct conditions? Yes

Inspection results: No violations noted

Number of complaints received to date: None

Describe complaint(s): N/A

Stack testing required? No

Dates of previous stack tests: August, 1993

Stack test results and description:

Stack tests were conducted by RMC Environmental Services, Inc. to determine the VOC destruction efficiency of the facility's Reeco regenerative thermal oxidizer. Results showed that the destruction efficiency ranged from 94.61% to 97.95%, and averaged 96.6%.

Are permit-to-construct conditions revised in this permit? No

Describe revisions: N/A

KEEP PERMIT AT SITE **CONTROL NO. B- 00128**

FAC # 6553
AI # 3188

State of Maryland

Robert L. Ehrlich, Jr.
Governor

Kendl P. Philbrick
Secretary

DEPARTMENT OF THE ENVIRONMENT

Air and Radiation Management Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

[ ] Construction Permit [X] Operating Permit

PERMIT NO.	033-00429	DATE ISSUED	June 1, 2004
PERMIT FEE	To be paid in accordance with COMAR 26.11.02.19B	EXPIRATION DATE	May 31, 2009

LEGAL OWNER & ADDRESS

Stone Industrial Division
Precision Products Group, Inc.
9207 51st Avenue
College Park MD 20740
Attn: Mr. Aubrey Williams

SITE

SAME

PRINCE GEORGE'S County

SOURCE DESCRIPTION

One (1) paper and plastic tube winding facility including:

1. Two (2) small boilers (2.5 and 5.3 MMBtu/hr) to provide space heat only;
2. Twelve (12) mylar winders that produce spiral wound plastic (mylar) tubing;
3. Two (2) small solvent recovery units; and
4. One (1) Reeco® regenerative thermal oxidizer to control emissions of VOC from the mylar winding, and solvent recovery operations.

This source is subject to the conditions described on the attached pages.

Program Manager

Director, Air and Radiation Management Administration

(NOT TRANSFERABLE)

STONE INDUSTRIAL DIVISION
PERMIT-TO-OPERATE
PERMIT NO. 033-00429

INDEX

Part A – General Provisions
Part B – Applicable Regulations
Part C – Operating Conditions
Part D – Monitoring, Record Keeping and Reporting

This permit-to-operate incorporates requirements for the following registered installations:

Registration No.	Description	Date of Installation
5-0794	Boiler, 2.5 MMBtu/hr, Natural Gas, Space Heat Only	06/1954
5-0795	Boiler, 5.3 MMBtu/hr, Natural Gas, Space Heat Only	06/1954
6-0616	12 Mylar Tube Production Winders	06/1953
6-0771	Two (2) LS 55 Solvent Recovery Stills	10/1994 & 08/2000

Part A – General Provisions

(1) The application (form AMA-26) received at the Department on March 25, 2004 for the renewal of the Permittee's permit-to-operate is incorporated into this permit by reference. If there are any conflicts between representations in the application and representations in this permit, the representations in the permit shall govern. Estimates of dimensions, volumes, emissions rates, operating rates, feed rates and hours of operation included in the application for renewal do not constitute enforceable numeric limits beyond the extent necessary for compliance with applicable requirements.

(2) Upon presentation of credentials, representatives of the Maryland Department of the Environment ("MDE" or the "Department:") and the Prince George's County Health Department shall at any reasonable time be granted, without delay and without prior notification, access to the Permittee's property and permitted to:

(a) determine compliance with the requirements of this permit and any applicable regulations;

(b) sample, as necessary to determine compliance with requirements of this permit and applicable regulations, any materials stored or processed on site, any waste materials, and any discharge into the environment;

(c) inspect any monitoring equipment required by applicable regulations or by any permit issued by the Department's Air and Radiation Management Administration;

(d) review and copy any records, including all documents required to be maintained by this permit and by applicable regulations, relevant to the Department's determination of compliance with an air pollution control requirement, and

(e) obtain any photographic documentation or evidence necessary to determine compliance with the requirements of this permit and applicable regulations.

(3) If any provision of this permit is declared by proper authority to be invalid, the remaining provisions of the permit shall remain in effect.

(4) Nothing in this permit authorizes the violation of any rule or regulation or the creation of a nuisance or air pollution.

Part B – Applicable Regulations

(1) This source is subject to all applicable federal air pollution control requirements.

(2) This source is subject to all applicable federally enforceable State air pollution control requirements including, but not limited to, the following regulations:

(a) COMAR 26.11.01.07C, which requires that the Permittee report to the Department occurrences of excess emissions.

(b) COMAR 26.11.02.09A, which requires that the Permittee obtain a permit-to-construct if an installation is to be modified in manner that causes a change in the quantity, nature, or characteristics of emissions referenced in the permit-to-construct issued for that installation.

(c) COMAR 26.11.06.02C(2), which prohibits visible emissions other than water in uncombined form.

(d) COMAR 26.11.09.05A(2), which prohibits visible emissions other than water in uncombined form from fuel burning equipment.

(e) COMAR 26.11.19.02B(2)(b)(ii), which allows the Permittee to use a control device that, when tested by approved test methods, results in an emissions reduction equal to or greater than the emissions reduction that would be achieved by application of low-VOC adhesives and resins that comply with COMAR 26.11.19.15C(3).

(f) COMAR 26.11.19.02I, which requires that the Permittee commit to writing and implement facility-wide "good operating practices" designed to minimize emissions of VOC.

(g) COMAR 26.11.19.16, which requires that the Permittee implement a VOC leak detection and repair program designed to minimize unintended emissions of VOC from process equipment and components, e.g., in-process vessels, storage tanks, pumps, compressors, valves, flanges and other pipeline fittings, pressure relief valves, process drains, and open-ended pipes.

(3) This source is subject to all applicable State-only air pollution control requirements including, but not limited to, the following regulations:

(a) COMAR 26.11.02.13A(28), which requires that the Permittee maintain and renew as required a valid State permit-to-operate issued by the Department.

(b) COMAR 26.11.02.14D, which requires that the Permittee submit to the Department not later than 60 days prior to expiration of this permit a completed application for renewal.

(c) COMAR 26.11.02.19C & D, which require that the Permittee submit to the Department annual certifications of emissions, and that the Permittee maintain sufficient records to support the emissions information presented in the submittals.

(d) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

(e) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

(f) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health.

Part C – Operating Conditions

(1) The Permittee shall maintain and operate all installations and associated air pollution control equipment so as to assure full and continuous compliance with all applicable air pollution control regulations and permit conditions.

(2) The Permittee shall properly maintain, calibrate, and operate all control panel instrumentation and all devices employed to monitor performance of the facility's air pollution control devices.

(3) Unless the Permittee obtains from the Department written approval for use of an alternative fuel, the Permittee shall fire only natural gas in the facility's two (2) boilers (ARMA registration numbers 5 – 0794 and 5 – 0795).

(4) The Permittee shall vent all exhaust gases from the following installations through the facility's Reeco® regenerative thermal oxidizer before discharge to atmosphere:

(a) all mylar winders as registered under ARMA registration number 6 – 0616; and

(b) two (2) solvent recovery units as registered under ARMA registration number 6 – 0771.

(5) Whenever gases containing VOC are being exhausted to the facility's Reeco® regenerative thermal oxidizer (RTO), the temperature of the combustion zone of the RTO shall be maintained at a minimum of 1400 °F, and the volumetric flow rate of the exhaust gases shall be such that the residence time of VOC in combustion zone is at least 0.5 second.

(6) In accordance with COMAR 26.11.19.02I, the Permittee shall implement "good operating practices" designed to minimize emissions of VOC to the atmosphere.

(a) "Good operating practices" shall include, at a minimum:

(i) Provisions for training operators with regard to practices, procedures, and maintenance requirements that are consistent with equipment manufacturers' recommendations, and with requirements dictated by the Permittee's experiences with operation of equipment. The training shall include material concerning proper maintenance procedures for air pollution control equipment;

(ii) Maintenance of covers on containers and other vessels that are not in use and that contain VOC or VOC-bearing materials;

(iii) Scheduling operations as much as practical to minimize color changes and other material changes when applying VOC-bearing materials by spray application;

(iv) Where practical, using high-volume-low-pressure (HVLP) spray applicators or other high efficiency application methods for spray application of VOC-bearing materials; and

(v) Mixing and blending VOC–bearing materials as much as practical in closed containers, and implementing preventive measures designed to minimize emissions from products that contain VOC.

(b) "Good operating practices" shall be established in writing, shall be made available to the Department upon request, and shall be either included as part of an operator training program or posted where clearly visible to operators.

(c) The Permittee shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process equipment and coating application equipment, including containers, vessels, tanks, lines, spray application devices, and pumps. Reasonable precautions for equipment cleanup shall include, at a minimum:

(i) Storing all waste materials, including VOC-contaminated cloth and paper, in closed containers;

(ii) For frequently cleaned equipment, preparing written standard operating procedures that include, wherever practical, provisions for using non-VOC or low-VOC cleaning agents, and procedures designed to minimize the quantities of VOC-bearing cleaning materials used;

(iii) Where practical, using enclosed spray-applicator cleaning methods, VOC-recycling systems and other spray-applicator cleaning methods designed to reduce or eliminate VOC emissions; and

(iv) Where practical, using detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment.

(d) With regard to storage and transfer of VOC, the Permittee shall, at a minimum:

(i) Install conservation vents, or other vapor control measures designed to minimize standing losses, on all storage tanks with a capacity of 2000 gallons or more in VOC service; and

(ii) For stationary storage tanks with capacities greater than 10,000 gallons and less than 40,000 gallons that store VOC or VOC-bearing materials, excluding gasoline, with vapor pressures greater than 1.5 psia, use vapor balance, vapor control lines, or other vapor control measures, whenever VOC are transferred from tank trucks into such tanks.

(7) In accordance with COMAR 26.11.19.16, the Permittee shall visually inspect all equipment and components in VOC service for leaks at least once per calendar month. If leaks are detected, the Permittee shall:

(a) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date that the leak was discovered, and the identity of the person who discovered the leak. The tag shall remain in place until the leak has been repaired.

(b) Initiate immediate action to repair all observed VOC leaks that can be repaired within 48 hours.

(c) Repair all other leaking components within fifteen (15) days of discovery. If a replacement part is needed, the part shall be ordered within three (3) days of discovery of the leak, and the leak shall be repaired within 48 hours of receipt of the part.

(d) Maintain a supply of components and component parts, such as seals, gaskets, packing and pipe fittings, that are known to wear or corrode, or that otherwise need to be routinely replaced.

Components that cannot be repaired as required because they are inaccessible, or that cannot be repaired during operation of an installation, shall be identified in a log and included in the facility's maintenance schedule for repair during the next outage of the installation.

Part D – Monitoring, Record Keeping and Reporting

(1) Whenever gases containing VOC are being exhausted to the Reeco® regenerative thermal oxidizer, the Permittee shall continuously monitor and record the temperature of the gases in the combustion zone of the RTO.

(2) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:

(a) all required recordation of the temperature of the gases in the combustion zone of the Reeco® regenerative thermal oxidizer;

(b) all written descriptions of "good operating practices" designed to minimize emissions of VOC; and

(c) VOC leak detection and repair logs that include identification of the persons who conducted the leak detection inspections, the dates on which the inspections were conducted, the findings during the inspections, a listing by tag identification number and a description of all leaks discovered, and the date and nature of all leak repairs effected.

(3) The Permittee shall maintain at the facility for at least five (5) years records necessary to support annual certifications of emissions and demonstrations of compliance for toxic air pollutants. Such records shall include:

(a) mass emissions rates for each regulated pollutant, and the total mass emissions rate for all regulated pollutants for each registered source of emissions;

(b) accounts of the methods and assumptions used to quantify emissions;

(c) all operating data, including operating schedules and production data, that were used in determinations of emissions;

(d) amounts, types, and analyses of all fuels used;

(e) any records, the maintenance of which is required by this permit or by State or federal regulations, that pertain to the operation and maintenance of continuous emissions monitors, including:

(i) all emissions data generated by such monitors;

(ii) all monitor calibration data;

(iii) information regarding the percentage of time each monitor was available for proper service; and

(iv) information concerning any equipment malfunctions.

(f) Information concerning operation, maintenance, and performance of air pollution control equipment and compliance monitoring equipment, including:

(i) identifications and descriptions of all such equipment;

(ii) operating schedules for each item of such equipment;

(iii) accounts of any significant maintenance performed,

(iv) accounts of all malfunctions and outages, and

(v) accounts of any episodes of reduced efficiency.

(g) limitations on source operation or any work practice standards that significantly affect emissions; and

(h) other relevant information as required by the Department.

(4) The Permittee shall submit to the Department by April 1 of each year during the term of this permit a certification of emissions for the previous calendar year. The certifications shall be prepared in accordance with requirements, as applicable, adopted under COMAR 26.11.01.05 – 1 and COMAR 26.11.02.19D.

(a) Certifications of emissions shall be submitted on forms obtained from the Department.

(b) A certification of emissions shall include mass emissions rates for each regulated pollutant, and the total mass emissions rate for all regulated pollutants for each of the Permittee's registered sources of emissions.

(c) The person responsible for a certification of emissions shall certify the submittal to the Department in the following manner:

"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 information submitted 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."

(5) The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

(a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

(b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

(6) The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Management Administration.

STATE OF MARYLAND-DEPARTMENT OF THE ENVIRONMENT
Air Management Administration

1800 Washington Boulevard
Baltimore MD 21230

RECEIVED
MAR 25 2004
BY

APPLICATION FOR PERMIT TO OPERATE PROCESS EQUIPMENT

I. PREMISE IDENTIFICATION:

STONE INDUSTRIAL
PRECISION PRODUCTS GROUP, INC.
PREMISE NAME OR IDENTIFICATION

FAC # 6553
033-00429
PREMISE NUMBER

9207 51ST AVENUE, COLLEGE PARK, MD 20740
PREMISE ADDRESS

PRINCE GEORGES
COUNTY

II. EQUIPMENT IDENTIFICATION:

☐ SINGLE INSTALLATION ☒ PROCESS LINE ☐ IDENTICAL UNITS AND NO. _____

III. DESCRIBE EQUIPMENT AND ITS MAJOR FUNCTION. STATE TYPE AND SIZE EQUIPMENT AND TYPE CONTROL DEVICE ASSOCIATED WITH THIS EQUIPMENT ONLY.

1. ELEVEN (11) WINDERS THAT PRODUCE SPIRAL WOUND PLASTIC TUBING.
2. STONIZE PROCESSING LINE CONSISTING OF 3 IMPREGNATORS AND 3 CURING OVENS.
3. A REGENERATIVE THERMAL OXIDIZER (RTO) TO CONTROL EMISSIONS FROM ABOVE LISTED PROCESSES.

IV. STATUS OF CONTROL EQUIPMENT:

(a) ☐ NO CONTROL EQUIPMENT NECESSARY. EMISSIONS _____.

(b) ☒ EXISTING CONTROL EQUIPMENT SATISFACTORY. EMISSIONS V.O.C.

☒ YES ☐ NO EQUIPMENT STACK TESTED ON SITE. DATE 8/5/93.

☐ YES ☐ NO EQUIPMENT TO BE TESTED, DATE _____.

(c) ☐ CONTROL EQUIPMENT PRESENTLY BEING CONSTRUCTED OR SCHEDULED FOR CONSTRUCTION.

STARTING DATE _____ ESTIMATED COMPLETION DATE _____.

☐ YES ☐ NO EQUIPMENT TO BE STACK TESTED, DATE _____.

(d) ☐ NON-COMPLIANCE.

Aubrey Williams HR Mgr
SIGNATURE AND TITLE

March 24, 2004
DATE

AMA-26

DENV 73

DO NOT WRITE BELOW THIS LINE

FIELD REPORT

INSPECTOR:	DATE OF INSPECTION:	PERSON CONTACTED:

DISCUSSION, CONDITIONS AND RECOMMENDATION:

MDE

MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore, MD 21230
410-537-3000 • 1-800-633-6101

Robert L. Ehrlich, Jr.
Governor

Kendl P. Philbrick
Secretary

Mr. Aubrey Williams
Stone Industrial Division
9207 51st Avenue
College Park, MD 20740-3100

MAY 14 2004

Dear Mr. Williams:

Enclosed is the renewal of the State permit-to-operate for your spiral wound tube manufacturing facility located in College Park in Prince George's County, Maryland. The renewal is for a 5-year term that expires May 31, 2009. The permit includes general conditions that apply to all State permit-to-operate holders in Maryland, and specific conditions that apply to your facility's particular operations.

Please be advised that the renewed permit includes some requirements that were not included in your former permit-to-operate. For example, requirements that have been adopted at COMAR 26.11.19.02I, which requires implementation of facility-wide "good operating practices" designed to minimize emissions of VOC, and requirements at COMAR 26.11.19.16, which requires implementation of a facility-wide VOC leak detection and repair program, have been included in the renewal. Please read your permit carefully. You are responsible for compliance with all standards, limitations and requirements included in the permit.

You are reminded that, for the permit to continue to be valid, you must pay annually an emissions based fee that is due by the anniversary date of the permit. Prior to each anniversary date the Department will issue an invoice to you for the amount due.

If you have any questions concerning the permit or the annual fee, please contact Mr. Ross Oliver of my staff at (410) 537-3931.

Sincerely,

Karen G. Irons

Karen G. Irons, P.E., Administrator
Air Quality Permits Program
Air & Radiation Management Administration

KGI/aw

Enclosure

cc: Laramie Daniel with copy of permit
Prince Georges County Health Department

January 26, 2010

Wastewater Manifest

114 Schoolground Rd.
Branford, CT 06405
Phone: (203) 483-5964
Fax: (203) 483-5984

350 Pigeon Point Road
New Castle, DE 19720
Phone: (302) 658-2005
Fax: (302) 658-6229

Bartow, FL 33830
Phone: (863) 533-4599
Fax: (863) 533-1613

Maple Heights, OH 44137
Phone: (330) 835-3473
Fax: (330) 835-3732

Phone: (570) 342-7232
Fax: (570) 342-7367

Phone: (803) 773-2611
Fax: (803) 773-2942

SHIPPER NAME/ADDRESS	PHONE (AREA CODE)		
STONE INDUSTRIES COLLEGE PARK, MD	TRACTOR: 718	TRAILER: 322	APPOINTMENT TIME: 730 :
FCI REP. LOADING (PRINT): ED WILLIAMS	PROCEDURE: VAC	EQUIP. SPOTTED	EQUIP. REMOVED
TIME AT SHIPPER (MILITARY TIME ONLY): ARRIVAL TIME 7:15	DEPARTURE TIME 7:45		
COMMENTS OR DELAYS AT SHIPPER		EQUIPMENT USED	

BROKER:

PO#: WO#: 757878

MANIFEST/DOCUMENT NO.

(X) HM		PROPER U.S. D.O.T. SHIPPING NAME	U.S. D.O.T. HAZARDOUS CLASS	NA/IJN/NO.	PACKING GROUP	NO. CONT.	CONT. TYPE	NET QUANTITY	UNIT MEASURE	WASTE NO.	FORM
	1	NON-REGULATED				1	TT	5025	G		
	2										
	3										

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION NUMBER.

OW-436 REL-1 DECAL 6510 ID 3557 50"

SHIPPER'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The materials described above were consigned to the Transporter named. The consignee can and will accept the shipment and has a valid permit to do so if required. I certify that the foregoing is true and correct to the best of my knowledge.

Payment to the contractor for waste removal does not constitute payment to the carrier and if the contractor does not pay the carrier, the shipper is obligated to pay the agreed rate offered to the contractor.

PLEASE PRINT NAME/TITLE	SHIPPER'S SIGNATURE	DATE LOADED
M. Matthews / Manufacturing Resource Co	X [signature] I HAVE READ THE ABOVE AND UNDERSTAND AND AGREE TO ALL OF ITS CONTENT.	1/26/10 MO. DAY YR.

CONSIGNEE NAME/ADDRESS	PHONE (AREA CODE)		
E.I. DuPont RT 130 DEEPWATER NJ	856 540 2773		NJD002385730
	TRACTOR: 718	TRAILER: 322	APPOINTMENT TIME: :
FCI REP. UNLOADING (PRINT): ED WILLIAMS	PROCEDURE	EQUIP. SPOTTED	EQUIP. REMOVED
TIME AT CONSIGNEE (MILITARY TIME ONLY): ARRIVAL TIME 10:00	DEPARTURE TIME 12:15		
COMMENTS OR DELAYS AT CONSIGNEE		EQUIPMENT USED	

PLEASE PRINT NAME/TITLE	CONSIGNEE SIGNATURE	DATE UNLOADED
Steve Kimmm	X [signature]	1/26/10 MO. DAY YR.

AR H-0257	MD HWH-167 2001-OPV-2335	MO H-1490	OH UPW-0190713-OH	TX 40705
CT CT-HW-307	ME ME-HWT-47 ME-WOT-47	ND WH-429	OK UPW-0190713-OH	WI 11602
DE DE-HW-203 DE-SW-203	MI UPW-0190713-OH	NH TNH-0047	ONTARIO, CANADA A 840943	WV UPW-0190713-OH
IL UPW-0190713-OH	MN UPW-0190713-OH	NJ S-2265 15939	PA PA-AH-0067	
MA MA-294		NY NJ-113	QUEBEC, CANADA QC-6ML-047	
			RI RI-535	

White - FCI Original
Yellow - FCI Billing
Blue - FCI Office/Customer
Green - Retained by TSDF
Gold - Retained by Generator

S 161343