AKZO NOBEL

Coatings Division

April 03, 2006

Mr. Jan P. Szaro (3WC31)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Szaro:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared 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 fines and imprisonment for knowing violations.

Signature _____

Name James Bray

Title General Manager - Roanoke

Reliance

Akzo Nobel Coatings Inc.
2837 Roanoke Ave., S.W.
P.O. Box 4627
Roanoke, VA 24015-0627
Tel. (540) 982-8301
FAX (540) 343-3863

Requested Information

1. In the facility response to 1.a. of Information Request (Reference No. C06-003), the map entitled "Quality Control and Manufacturing Building" indicates that the drum outside of the Quality Control Lab is a 90 Day Storage Area. In response to 10.a. of the same Information Request, the drum outside of the Quality Control Lab is described as a satellite accumulation area.

a. Please clarify whether the facility considers the area where this drum outside of the Quality Control Lab is located as a 90 Day Storage Area or a Satellite Accumulation Area.

The drum located outside of the Quality Control Lab was originally set up as a satellite area It was determined that the drum would better fulfill needs if it was changed to a 90 Day Storage Area. It is currently classified as a 90 Day Storage Area. This location was changed to a 90 Day Storage Area on January 20, 2006.

b. Please state the frequency with which wash solvent is generated in the Quality Control Lab.

The Quality Control Lab generates new wash solvent once a week. Once a week the solvent in the wash tanks are emptied into the 90 Day Storage Drum located adjacent to the outside of the Quality Control Lab. Clean solvent is added to the wash tanks to be used the next week.

c. Please state the frequency with which the wash solvent is added to the drum outside of the Quality Control Lab.

Wash solvent is added to the drum outside of the Quality Control Lab once a week.

2. Section 2.f. of Information (Request Reference No. CO6-003) requested documentation, as of April 12, 2005, to support that the ancillary equipment associated with the Main Hazardous Waste Storage Tank was fulfilling the requirements of the air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050. The documentation provided in response was for the time period of May 2005 and on.

   a. For the time period of July 2001, through and including April 2005, please provide documentation that the ancillary equipment associated with the Main Hazardous Waste Storage Tank was fulfilling the requirements of the air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050.

      See attached.

Leak Detec[illegible]. Inspection Log

40 CFR 1064 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
7-2-01	pump seal - 1			SW		
7-9-01	"			SW		
7-16-01	"			SW		
7-23-01	"			SW		
7-30-01	"			SW		

Date 7-2-01

Leak Detec[illegible] Inspection Log

40 CF[illegible].064 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	< 10,000	
gate valve2	4" Ball Valve	SW	"	N/A	< 10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 3	4" Ball Valve	SW	"	N/A	< 10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	< 10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2	4" Ball Valve	SW	"	N/A	< 10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
10-1-01	pump seal - 1			SW		
10-8-01				SW		
10-15-01				SW		
10-22-01				SW		
10-29-01				SW		

Date 10-1-01

Leak Dete[illegible] . Inspection Log

40 CF[illegible]064 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	< 10,000	
gate valve2	4" Ball Valve	SW	"	N/A	< 10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 3	4" Ball Valve	SW	"	N/A	< 10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	< 10,000	
Sample valve	1" Ball Valve	SW	"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2	4" Ball Valve	SW	"	N/A	< 10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
1-7-02	pump seal - 1			SW		
1-14-02	"			SW		
1-21-02	"			SW		
1-28-02	"			SW		

Date 1-7-02

Leak Detec[illegible] Inspection Log

40 CFR [illegible]34 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
4-1-02	pump seal - 1			SW		
4-8-02	"			SW		
4-15-02	"			SW		
4-22-02	"			SW		
4-29-02	"			SW		

Date 4-1-02

Leak Detec[illegible] . Inspection Log

40 CFR [illegible]54 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
7-1-02	pump seal - 1			SW		
7-8-02				SW		
7-15-02				SW		
7-22-02				SW		
7-29-02				SW		

Date 7-1-02

Leak Detec . Inspection Log

40 CFR 54 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	< 10,000	
gate valve2	4" Ball Valve	SW	"	N/A	< 10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 3	4" Ball Valve	SW	"	N/A	< 10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	< 10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2	4" Ball Valve	SW	"	N/A	< 10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
10-7-02	pump seal - 1			SW		
10-14-02	"			SW		
10-21-02	"			SW		
10-28-02	"			SW		

Date 10-7-02

Leak Dete[illegible] . Inspection Log

40 CF[illegible] 64 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
	pump seal - 1					
1-6				SW		
1-13				SW		
1-20				SW		
1-27				SW		

Date 1-6-03

Leak Detr . Inspection Log

40 CFR 64 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
	pump seal - 1					
2-3				SW		
2-10				SW		
2-17				SW		
2-24				SW		

Date 2-3-03

Leak Dete . Inspection Log

40 CFR 64 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
	pump seal - 1			SW		
4-7	SW			SW		
4-14	SW			SW		
4-21	SW			SW		
4-28	SW					

Date 4-7-03

Leak Dete . Inspection Log

40 CFR 64 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve		"	N/A	<10,000	
gate valve2	4" Ball Valve		"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
	pump seal - 1					
7-7				SW		
7-14				SW		
7-21				SW		
7-28				SW		

Date 7-7-03

Leak Detec[illegible] Inspection Log

40 CF[illegible]64 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
	pump seal - 1					
10-6				SW		
10-13				SW		
10-20				SW		
10-27				SW		

Date 10-6-03

Leak Detec[illegible] Inspection Log

40 CFR [illegible]64 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
	pump seal - 1					
1-5				SW		
1-12				SW		
1-19				SW		
1-26				SW		

Date 1-5-04

Leak Detec[illegible]. Inspection Log

40 CFR [illegible]54 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				

Date	Seal ID#	Potential Leak (ID#)	LDR Form Control No. (if leak detected)		
4-4	pump seal - 1		SW		
4-11			SW		
4-18			SW		
4-25			SW		

Date 4-4-04

Leak Detec[illegible] Inspection Log

40 CFR [illegible]54 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
	pump seal - 1					
7-5				SW		
7-11				SW		
7-18				SW		
7-25				SW		

Date 7-5-04

Leak Detec[illegible] Inspection Log

40 CFR [illegible]64 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
	pump seal - 1					
10-4				SW		
10-11				SW		
10-18				SW		
10-25				SW		

Date 10-4-04

Leak Detec[illegible] Inspection Log

40 CFR [illegible]54 (d) and (g)(4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) Rae Systems MultiRae (PID)	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
valve - 3	4" Ball Valve	SW	"	N/A	<10,000	
One way valve 1	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve	1" Ball Valve		"			
Output						
valve - 1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				
Date	**Seal ID#**	**Potential Leak (ID#)**		**LDR Form Control No. (if leak detected)**		
	pump seal - 1					
1-3				SW		
1-10				SW		
1-17				SW		
1-24				SW		
1-31				SW		

Date 1-3-05

Leak Detection Inspection Log

40 CFP 64 (d) and (g) (4)

Note: for instrument readings at or above 10.000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) LEL /O2	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1 #3	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #4	4" Ball Valve	SW	"	/N/A	<10,000	
valve - 3 #5	4" Ball Valve	SW	"	N/A	<10,000	
One way valve #6	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve #7	1" Ball Valve		"			
Output						
valve - 1 #1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				

Date	Seal ID#	Potential Leak (ID#)		LDR Form Control, No. (if leak detected)			
	pump seal - 1						
4-4				SW			
4-11				SW			
4-18				SW			

Date April 05

Akzo Nobel Coatings, Inc.
Roanoke VA

b. Please include a description of the testing procedure used in 2.a. Include an explanation of how facility personnel knew what components of the ancillary equipment were to be tested prior to said components being tagged after the April 12, 2005 EPA Compliance Evaluation Inspection (CEI).

A PID unit and an additional LEL meter as a back –up is used in the monitoring process. When checking valves, the instrument probe is placed where the valve exits the pipe and the stem circumference is checked. On flanges, the probe is placed as close as possible to the outer edge of the flange and the circumference is monitored. If a change in reading is observed, further checking is done. The LEL meter is used in the same manner. The HSE Manager, who is familiar with the hazardous waste transfer process conducts the monitoring procedure. In the event the HSE Manager is not present when monitoring is due, the monitoring will be conducted by the Waste Minimization Manager.

Our piping system for pumping hazardous waste is a very short run of pipe approximately 25 – 30 feet long located inside a diked area. The waste is pumped from a 55 gallon drum through a 6 foot flex hose to the hard piping system. Once a month the waste is pumped into a tanker through hard piping running inside of the diked area to the edge of the dike. Flex hose is run from the diked area to the transfer truck. Basically, we check all flanges and valves on the system.

3. In response to Section 11.a. of Information Request (Reference No. C06-003) the facility listed the following employees as having primary responsibility for hazardous waste at the time of the April 12, 2005 CEI:

Sam Winkler, HSE Manager
Steve Oser, Waste Minimization Manager
Wayne Underwood, Waste Coordinator
Rudge Butterworth, Lab Porter

a. From July 2001 until the present, please supply a list of all employees, past and present, who had primary responsibility for hazardous waste during this time period. Include the dates where they had this responsibility and each individual's job title.

Sam Winkler HSE Manager 2001 – present
Steve Oser Waste Minimization Manager 2001 – present
Wayne Underwood Waste Coordinator 2001 – present
Ernie Johnson Lab Porter 2001 – 10/04
Rudge Butterworth Lab Porter – 10/04 – 10/05
Maurice Gordon Lab Porter - 10/05 - present

b. From July 2001 until the present, please supply sign-in sheets for any and all RCRA training sessions provided. Sign-in sheets were previously provided for training sessions conducted on April 29, 2005, December 17, 2004 and December 10, 2003. Of those previously submitted, only the sign-in sheets for the December 10, 2003 session needs to be resubmitted as only the first two pages had legible signatures in the first submission.

See attached. Please note! The employees with the primary waste responsibilities are indicated with an * on the sign in sheets. Some employees had training prior to assuming responsibility in the waste program. The * was added when the employee assume waste duties.

Class Attendance Sign In
Hazardous Waste
Date November 28, 2001
Instructor Sam Winkler

Student	Department	Signature
Akers, Bill	Receiving	
Alls, John	QC Lab	John Alls
Beckner, Mark	Plant Office	
Bright, Henry	Stain Dept	Bucky Bright
Bumbalough, Shawn	Water Lab	
Burgoyne, Scott	QC Lab	Scott Burgoyne
Butterworth Rudge	Stain Dept	Rudge Butterworth
Caldwell, Loretta	Stain Dept	
Carter, Linda	Shipping Dept	Linda Carter
Creamer, Jerry	R&D Lab	
Cundiff, David	Lacquer Dept	
DeWeese, Bruce	Paint Dept	
Doyle, Lee	UV Dept	
Eckert, Andrew	QC Lab	
Fisher, Gary	Maintenance	Gary Fisher
Floyd, John	Paint Dept	
Foutz, James	QC Lab	
Franklin, Dean	Stain Dept	

Frye, David	QC Lab	
Gillispie, Matt	Lacquer Dept	
Greenman, Eric	Water Lab	
Harrison, James	Paint Lab	
Hooper, Mike	Stain Dept	
Hunt, Luther	Paint Dept	
Hutton, Staley	Paint Dept	
Isom, Eddie	UV Dept	
Jackson, William	Lacquer Dept	
Jackson, Ronnie	Paint Dept	
* Johnson, Ernest	Lab	
Johnson, Steve	Lacquer Dept	
La Fontaine, Steve	Analytical Lab	
Legans, Vance	Paint Dept	
Logan, Eric	UV	
Mackenhimer, James	Stain Dept	
Macklin, Brian	Lacquer Dept	
Markham, Daryl	Stain Lab	
Markham, Keith	Plant Office	
Marsico, David	Paint Lab	
Marsico, Tony	Prod. Manager	
McBee, Paul	Water Lab	
Millehan, Ronald	QC Lab	

	Mills, Keyford	Shipping	Keyford Wilson Mills
	Minnix, David	Stain Lab	David
	Mittelstetter, Toby	Lacquer Dept	Toby Mittelstetter
	Moore, Bobby	Paint Dept	Bobby R Moore
	Morris, Alice	Stain Lab	Alice Morris
	Moyers, Bobby	Lacquer Dept	Bobby Moyers
	Nichols,. Matthew	Shipping Department	
*	Oser, Steve	Waste Manager	Steve Oser
	Overstreet, Daniel	Paint Dept	
	Patel, Arvind	UV Lab	
	Poff, Michael	QC Lab	Mike Poff
	Powell, Brian	Lacquer Dept	Brian Powell
	Powell, Wayne	Stain Lab	Wayne Powell
	Reynolds, Jeff	Short Order	
	Rice, James	Stain Dept	James Rice
	Ryder, Robert	Stain Dept	
	Saunders, Kristi	Lacquer Lab	Kristi Saunders
	Saunders, Heath	Lacquer Lab	Heath Saunders
	Saunders, Mark	Grinding Dept	2001
	Schoonover, Dennis	Paint Dept	
	Schoonover, Gerald	Receiving Dept	G Schoonover
	Scott, David	Shipping Dept	
	Stump, Grover	Lacquer Dept	Grover Stump

	Tingler, Darnell	**Stain Dept.**	Darnell Tingler
	Turner, Ronald	**Stain Dept**	Ron Turner
	Turpin, Greg	**QC Lab**	Gregory M. Turpin
	Tyree, Jason	**Paint Dept**	Jason Tyree
*	**Underwood, Wayne**	**Haz Waste**	Wayne Underwood
	Vandergrift, Al	**Paint Dept**	Allen Vandergrift
	Via, Julian	**Maintenance Dept**	[illegible]
	Waldron, Monroe	**Stain Dept**	Monroe Waldron
	Webb, Danny	**Stain Dept**	Danny Webb
*	**Winkler, Sam**	**HSE Manager**	[illegible]
	Wood, Jason	**Stain Dept**	Jason Wood
	Wood, Ronnie	**Lacquer Dept**	
	Bishop, Lisa		Lisa Bishop
	Wood, Darlene	Shipping	Darlene Wood

Class Attendance Sign In
Hazardous Waste
December 19, 2002
Instructor Sam Winkler

Student	Department	Signature
Akers, Bill	Receiving	Bill Akers
Alls, John	QC Lab	John alls
Beckner, Mark	Production Mgr	Mark B
Bradley, Creg	UV Lab	
Bright, Henry	Stain Dept	Buck
Bumbalough, Shawn	Water Lab	S. Bumbalough
Burgoyne, Scott	QC Lab	Boog
Butterworth Rudge	Stain Dept	Rudge Butterworth
Carter, Linda	Shipping Dept	Linda Carter
Creamer, Jerry	R&D Lab	Jerry Creamer
Cundiff, David	Lacquer Dept	D. Cundiff
DeWeese, Bruce	Paint Dept	Bruce DeWeese
Doyle, Lee	UV Dept	
Eckert, Andrew	QC Lab	
Fisher, Gary	Maintenance	
Floyd, John	Paint Dept	JOHN FLOYD
Foutz, James	QC Lab	James Foutz
Franklin, Dean	Stain Dept	Dean Franklin

	Frye, David	QC Lab	
	Gillispie, Matt	Lacquer Dept	
	Greenman, Eric	Water Lab	
	Harrison, James	Paint Lab	
	Hunt, John	Stain Dept	JOHN C HUNT
	Hunt, Luther	Paint Dept	Luther Hunt
	Hutton, Staley	Paint Dept	
	Isom, Eddie	Stain Dept	E. Isom
	Jackson, William	Lacquer Dept	
	Jackson, Ronnie	Paint Dept	Ron A. Jackson
*	Johnson, Ernest	Lab	
	Johnson, Steve	Lacquer Lab	Steve Johnson
	Keeling, Clarnece	Lacquer Dept	Clarence D Keeling
	La Fontaine, Steve	Analytical Lab	Steph La Font
	Legans, Vance	Paint Dept	Vance Legans
	Mackenhimer, James	Stain Dept	Jaus Mackenhimer
	Macklin, Brian	Lacquer Dept	Brian Macklin
	Markham, Daryl	Stain Lab	
	Marsico, David	Paint Lab	
	McBee, Paul	Water Lab	
	Millehan, Ronald	QC Lab	Ron Millehan
	Mills, Keyford	Grinding	
	Minnix, David	Stain Lab	

	Mittelstetter, Toby	Shipping	
	Moore, Bobby	Paint Dept	Ray Moore
	Morris, Alice	Stain Lab	
	Mortimer, John	Plant Manager	
	Moyers, Bobby	Lacquer Dept	
*	Oser, Steve	Waste Manager	
	Overstreet, Daniel	Paint Dept	
	Patel, Arvind	UV Lab	
	Poff, Michael	QC Lab	M Poff
	Powell, Brian	Inventory Mgr	Brian Powell
	Powell, Wayne	Stain Lab	
	Reynolds, Jeff	Shipping	
	Rice, James	Stain Dept	
	Ryder, Robert	Stain Dept	
	Saunders, Heath	Lacquer Lab	
	Saunders, Mark	Receiving Dept	
	Schoonover, Dennis	Paint Dept	
	Schoonover, Gerald	Receiving Dept	
	Scott, David	Shipping Dept	
	Stump, Grover	Lacquer Dept	
	Tingler, Darnell	Stain Dept.	
	Turner, Ronald	Stain Dept	
	Turpin, Greg	QC Lab	

	Tyree, Jason	**Paint Dept**	
*	**Underwood, Wayne**	**Haz Waste**	W. Underwood
	Vandergrift, Al	**Paint Dept**	Allen Vandergrift
	Via, Julian	**Maintenance Dept**	
	Waldron, Monroe	**Stain Dept**	Monroe Waldron
*	**Winkler, Sam**	**HSE Manager**	
	Wood, Daryl	**Lacquer Dept**	
	Wood, Jason	**Lacquer Dept**	JASON WOOD
	Wood, Ronnie	**Lacquer Dept**	RONNIE WOOD
	Youngsem, Josh	Stain	Joshua E. Youngsem
	Bowles, Larry	Stain	Larry M. Bowles

Class Attendance Sign In
Site Security Plan/ RCRA
December 10, 2003
Instructor Sam Winkler

Student	Department	Signature
Agee, Chris	Shipping	
Akers, Bill	Receiving	Bill AKERS
Alls, John	QC Lab	John Alls
Beckner, Mark	Production Mgr	
Bowles, Larry	Stain Dept	L Bowles
Bradley, Creg	UV Lab	
Bright, Henry	Stain Dept	Bucky
Bumbalough, Shawn	Water Lab	
Burgoyne, Scott	QC Lab	Boog
Butterworth Rudge	UV Dept	Rudge Butterworth
Carter, Linda	Shipping Dept	Linda Carter
Creamer, Jerry	R&D Lab	R Creamer
Cundiff, David	Lacquer Dept	David Cundiff
DeWeese, Bruce	Receiving Dept	B. DeWeese
Doyle, Lee	UV Dept	
Eckert, Andrew	QC Lab	
Fisher, Gary	Maintenance	Gary Fisher
Floyd, John	Paint Dept	

Foutz, James	QC Lab	James Foutz
Frye, David	QC Lab	David Frye
Gillispie, Matt	Lacquer Dept	
Greenman, Eric	Water Lab	
Harrison, James	Paint Lab	
Hunt, John	Paint Dept	John C. Hunt Jr
Hunt, Luther	Paint Dept	
Hutton, Staley	Paint Dept	Staley Hutton
Isom, Eddie	Stain Dept	E. Isom
Jackson, William	Lacquer Dept	WILLIAM JACKSON
Jackson, Ronnie	Paint Dept	Ron Jackson
* Johnson, Ernest	Lab	
Johnson, Steve	Lacquer Lab	
Keeling, Clarence	Lacquer Dept	Clarence D Keeling
La Fontaine, Steve	Analytical Lab	
Lee, Fred	Stain Lab	Fred Lee
Legans, Vance	Paint Dept	
Lechowich, Ron	~~Stain~~ PAINT Dept	
Mackenhimer, James	Stain Dept	James Mackenhimer
Macklin, Brian	Lacquer Dept	BRIAN MACKLIN
Markham, Daryl	Stain Lab	
Marsico, David	Paint Lab	David Marsico
McBee, Paul	Water Lab	

	Millehan, Ronald	QC Lab	Ronald Millehan
	Minnix, David	Stain Lab	David
	Mittelstetter, Toby	Shipping	TOBY MITTELSTETTER
	Moore, Bobby	Paint Dept	Ray Moore
	Morris, Alice	Stain Lab	Alice Morris
	Mortimer, John	Plant Manager	
	Moyers, Bobby	Lacquer Dept	Bobby Moyers
*	Oser, Steve	Waste Manager	Steve Oser
	Overstreet, Daniel	Paint Dept	
	Patel, Arvind	UV Lab	R Patel
	Persinger, Tim	Stain Dept	
	Poff, Michael	QC Lab	
	Powell, Brian	Inventory Mgr	Brian Powell
	Powell, Wayne	Stain Lab	Wayne Powell
	Reynolds, Jeff	Shipping	
	Rice, James	Stain Dept	James Rice
	Ryder, Robert	Stain Dept	Robert Ryder
	Saunders, Heath	Lacquer Lab	
	Saunders, Mark	Grinding Dept	
	Schoonover, Dennis	Paint Dept	
	Schoonover, Gerald	Receiving Dept	
	Scott, David	Shipping Dept	DAVID Scott

	Stump, Grover	Lacquer Dept	Grover Stump
	Tingler, Darnell	Stain Dept.	Darnell Tingler
	Turner, Ronald	Stain Dept	Ron Turner
	Turpin, Greg	QC Lab	Gregory H. Turpin
	Tyree, Jason	Paint Dept	TyAC
*	Underwood, Wayne	Haz Waste	Wayne Underwood
	Vandergrift, Al	Paint Dept	Allen Vandergrift
	Via, Julian	Maintenance Dept	JVia
	Waldron, Monroe	Stain Dept	Monroe Waldron
*	Winkler, Sam	HSE Manager	Sam Winkler
	Wood, Jason	Lacquer Dept	Jason Wood
	Wood, Ronnie	Lacquer Dept	Moose
	Yaunsen, Josh	Stain Dept	Josh Yaunsen

Class Attendance Sign In

RCRA, Hazardous Waste
January 27, 2006
Instructor Sam Winkler

Student	Department	Signature
Alls, John	QC Lab	John Alls
Beckner, Mark	Production Mgr	Mark A Beck
Bowles, Larry	UV Dept	[illegible]
Bradley, Creg	UV Lab	[illegible]
Brigdon, Robert	Stain Robert Brigdon	[illegible]
Bright, Henry	Stain Dept	[illegible]
Bumbalough, Shawn	Water Lab	[illegible]
Burgoyne, Scott	QC Lab	Boog
Butterworth Rudge	Lab	Rudge
Carter, Linda	Receiving Dept	L. Carter
Chocklett, Greg	Stain Dept	Greg Chocklett
Creamer, Jerry	R&D Lab	Jerry Creamer
Cundiff, David	Lacquer Dept	[illegible]
DeWeese, Bruce	Receiving Dept	
Doyle, Lee	UV Dept	[illegible]
Eckert, Andrew	QC Lab	[illegible]
Ellis, Dale	Shipping	Dale Ellis
Fisher, Gary	Maintenance	Gary Fisher

	Foutz, James	QC Lab	
	Frye, David	QC Lab	
	Gillispie, Matt	Lacquer Dept	
*	Gordon Maurice	~~Shipping Dept~~ Lab Porter	
	Greenman, Eric	Water Lab	
	Harrison, James	Paint Lab	
	Hively, David	Analytical Lab	
	Hunt, John	Paint Dept	
	Hunt, Luther	Paint Dept	
	Hutton, Staley	Paint Dept	
	Isom, Eddie	Stain Dept	
	Jackson, William	Lacquer Dept	
	Jackson, Ronnie	Paint Dept	
	Johnson, Steve	Lacquer Lab	
	Jones, Doug	Paint Dept	
	Keeling, Clarence	Lacquer Dept	
	Lee, Fred	Lacquer Dept	
	Legans, Vance	Paint Dept	
	Lechowich, Ron	Paint Dept	
	Mackenhimer, James	Stain Dept	
	Markham, Daryl	Lacquer Lab	
	Marsico, David	Paint Lab	
	McBee, Paul	Water Lab	
	JONES RICHAR	STAIN	

Johnson Vontez shipping

	Millehan, Ronald	QC Lab	Ronald V Millehan
	Minnix, David	Stain Lab	David Minnix
	Mittelstetter, Toby	~~Shipping~~ LAC	MITTELSTETTER
	Moore, Bobby	Paint Dept	
	Moore, Ron	Shipping	
	Morris, Alice	Stain Lab	Alice Morris
	Moyers, Bobby	Lacquer Dept	Bobby Moyers
*	Oser, Steve	Waste Manager	Steve Oser
	Patel, Arvind	UV Lab	A Patel
	Powell, Brian	Inventory Mgr	Brian Powell
	Powell, Wayne	Stain Lab	Wayne Powell
	Reynolds, Jason	Stain Dept	Jason Reynolds
	Reynolds, Jeff	Stain Dept	Jeff Reynolds
	Rice, James	Stain Dept	James Rice
	Ryder, Robert	Stain Dept	
	Saunders, Heath	Lacquer Lab	Heath Saunders
	Saunders, Mark	Grinding Dept	Mark Saunders
	Schoonover, Dennis	Paint Dept	Dennis Schoonover
	Schoonover, Emerson	Plant Mgr	Emerson Schoonover
	Scott, David	Shipping Dept	D. Scott
	Seale, Matt	Stain Dept	Matt Seale
	Stump, Grover	Lacquer Dept	Grover Stump
	Tingler, Darnell	Stain Dept.	Darnell L Tingler

	Turner, Ronald	**Stain Dept**	Ron Turner
	Turpin, Greg	**QC Lab**	Gregory H. Turpin Sr.
	Tyree, Jason	**Paint Dept**	TUPAC
*	**Underwood, Wayne**	**Haz Waste**	Wayne Underwood
	Vandergrift, Al	**Paint Dept**	Allen Vandergrift
	Via, Julian	**Maintenance Dept**	J. Via
	Waldron, Monroe	**Stain Dept**	Monroe Waldron
*	**Winkler, Sam**	**HSE Manager**	Sam Winkler
	Wood, Jason	**Lacquer Dept**	JASON WOOD
	Wood, Ronnie	**Receiving Dept**	R WOOD
	Yaunsen Joe	**Stain Dept**	
	Yaunsen, Josh	**Lacquer Dept**	Joshua E. Yaunsen
	Levon Turpin	**Office**	
	Lisa Bishop	**Office**	
	Mary Morris	**Office**	
	Teresa Fizer	**Office**	
	Janet Neighbors	**Office**	
	Francis Lam	**Office**	
	Scot Thompson	**Office**	

AKZO NOBEL

Coatings Division

January 24, 2006

Mr. Jan P Szaro
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Szaro:

Enclosed is the response to the information request resulting from the CEI on April 12, 2005.

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared 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 fines and imprisonment for knowing violations.

Regards:

James Bray
General Manager
Akzo Nobel Coatings, Inc.
Roanoke, Virginia

Reliance

Akzo Nobel Coatings Inc.
2837 Roanoke Ave., S.W.
P.O. Box 4627
Roanoke, VA 24015-0627
Tel. (540) 982-8301
FAX (540) 343-3863

In general, the Roanoke Facility accumulates hazardous wastes in satellite accumulation areas at the point of generation of the waste.

The hazardous waste type is determined at the point of generation and appropriate waste codes are assigned.

When the satellite accumulation container is full, the less than 90 day storage time begins and the waste is moved to a less than 90 day storage area where smaller containers are combined with compatible wastes into larger containers (typically drums).

If the drummed waste can be pumped and it is a compatible waste, it will be pumped to the hazardous waste storage tank. Because of the mixture rule, the waste codes are assigned based on contents of the hazardous waste tank (typically D001, F003, F005 and D035). Waste is pumped from the tank to a tank truck, manifested and shipped off site to an approved Treatment Storage and Disposal Facility (TSDF).

If the drummed waste cannot be pumped or is not a compatible waste, it is shipped off site in drums to an approved Treatment Storage and Disposal Facility (TSDF).

Land Disposal Restriction (LDR) determination is made when the waste stream is profiled with the disposer. At a minimum the LDR form is sent with the first load.

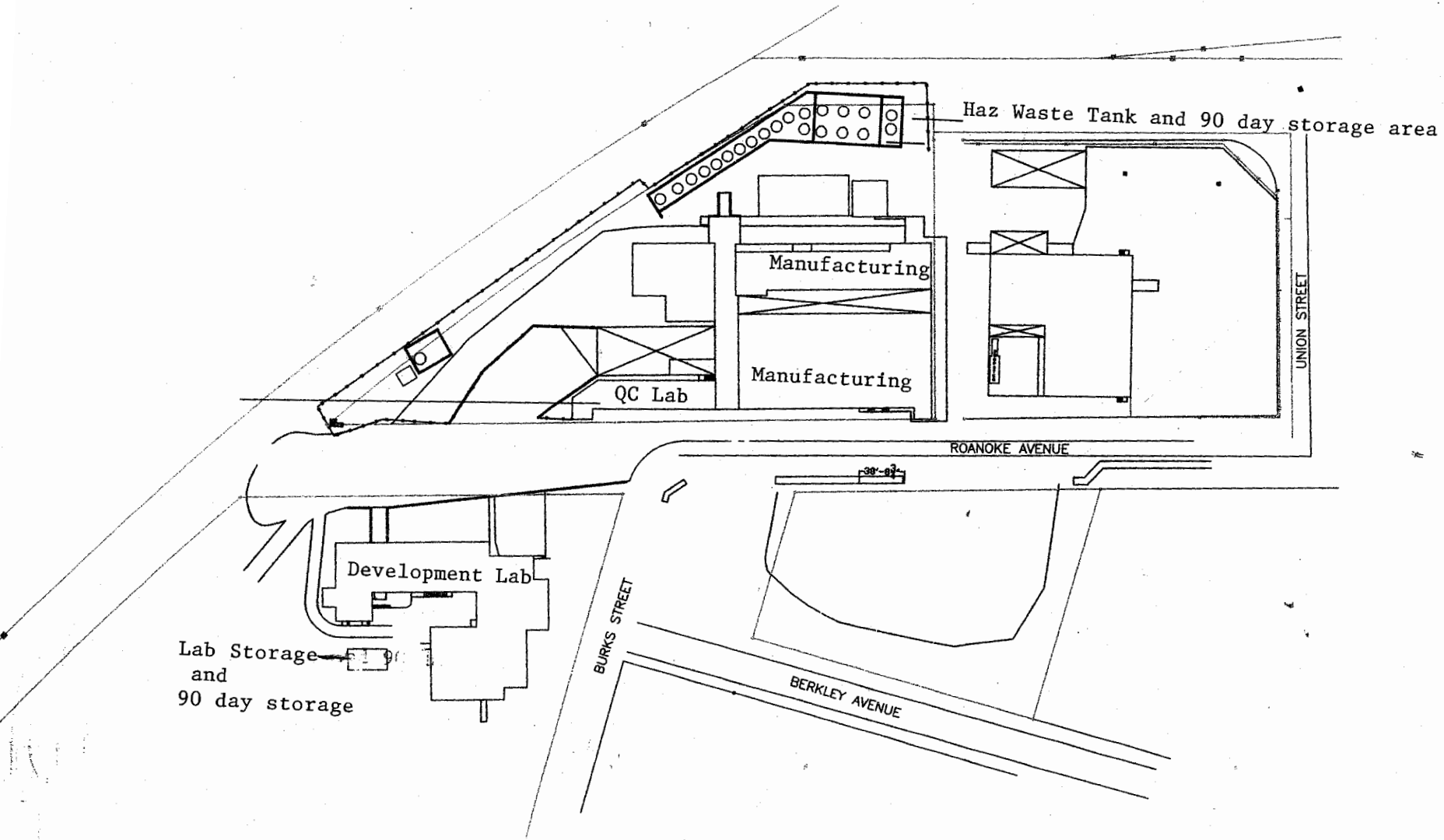
Containers that previously contained hazardous waste are emptied to meet the RCRA-empty requirements and are either reused or appropriately disposed of.

Solvent contaminated wipes (or rags) are accumulated on site and are sent off site to be laundered and returned to the facilty.

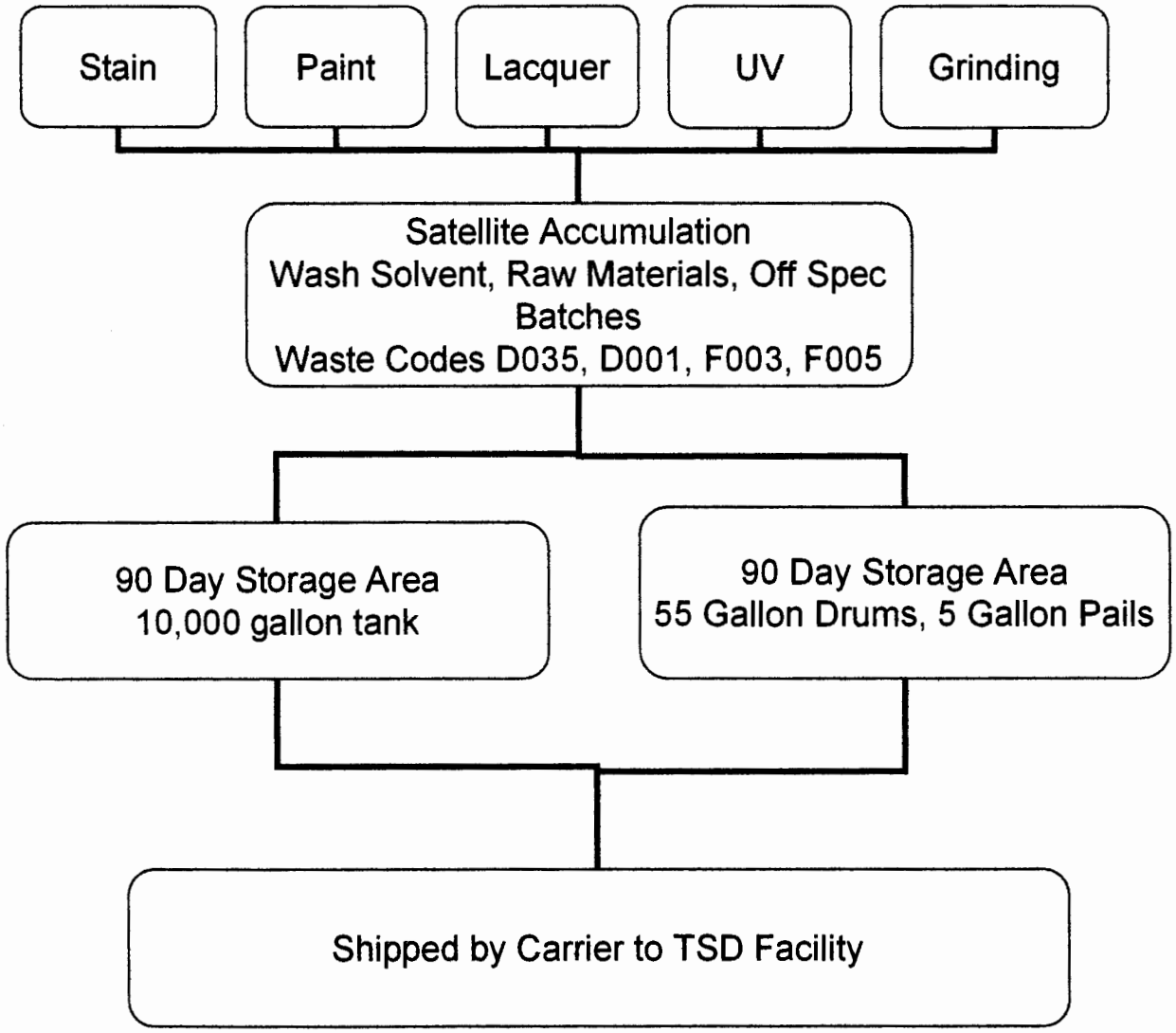
Question 1 a.

Provide a flow diagram of the movement of all hazardous waste through the facility

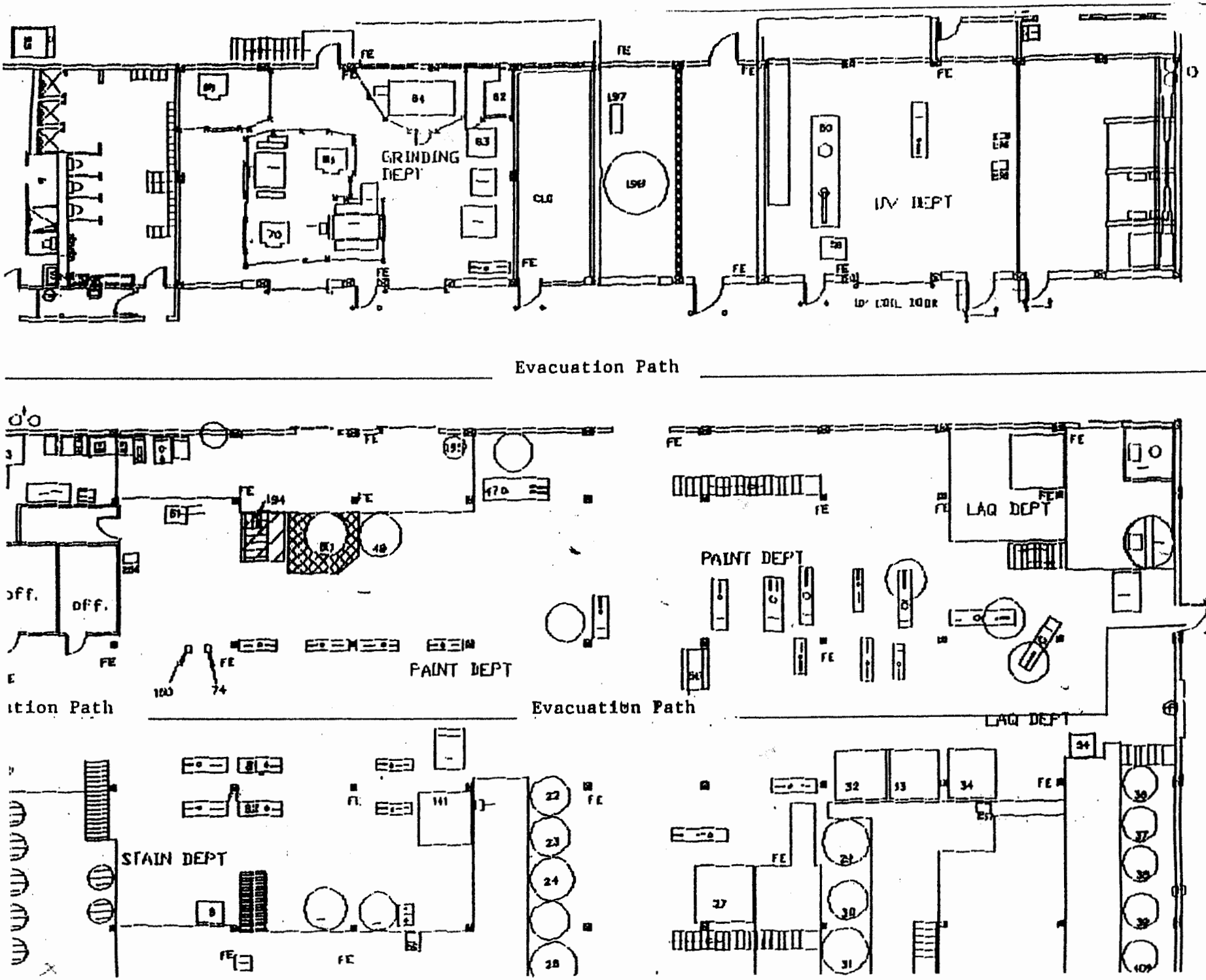
Overall Site Plan



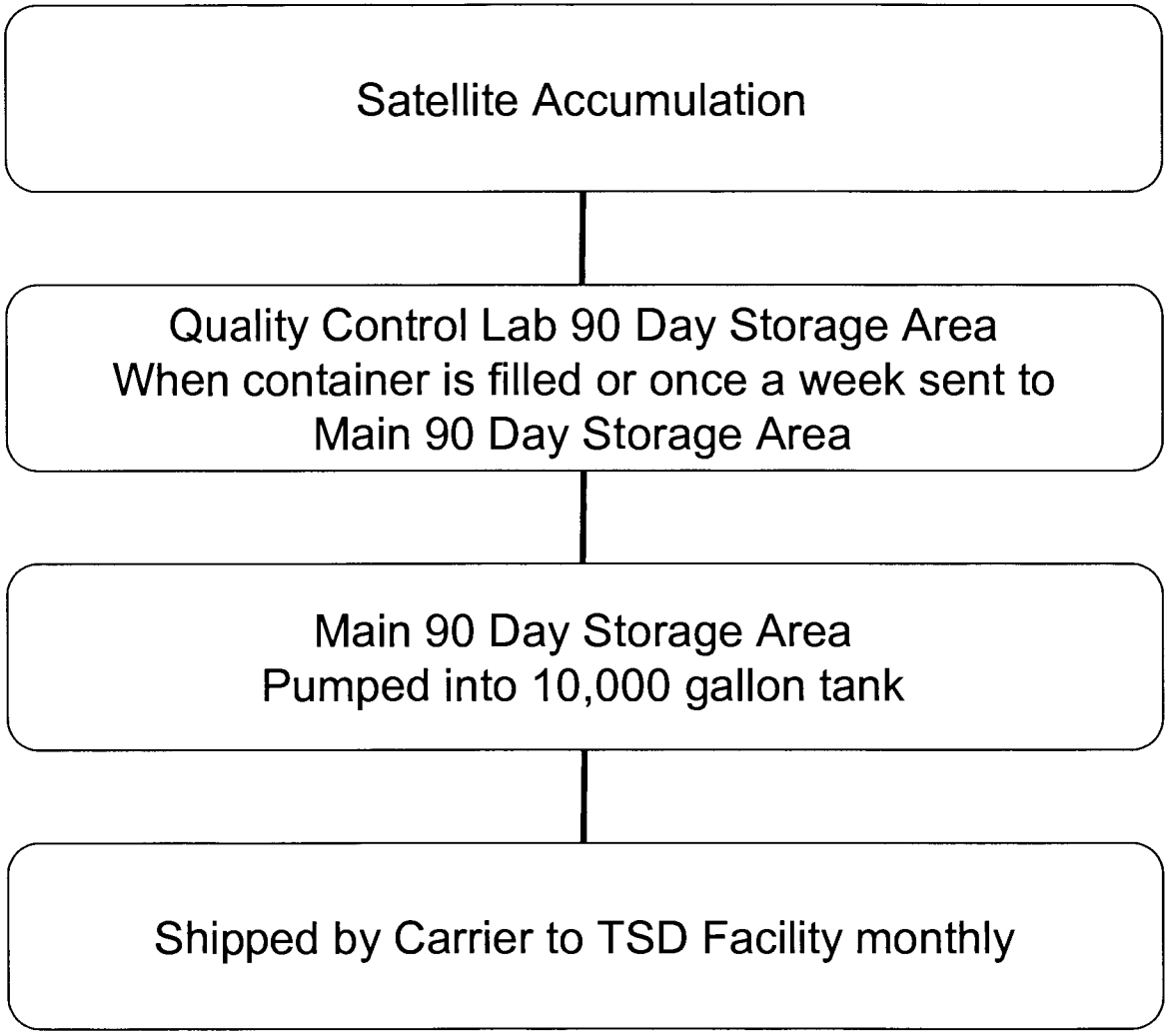
Manufacturing Departments



Manufacturing Interior
(Highlighted Red X indicates Satellite Area)

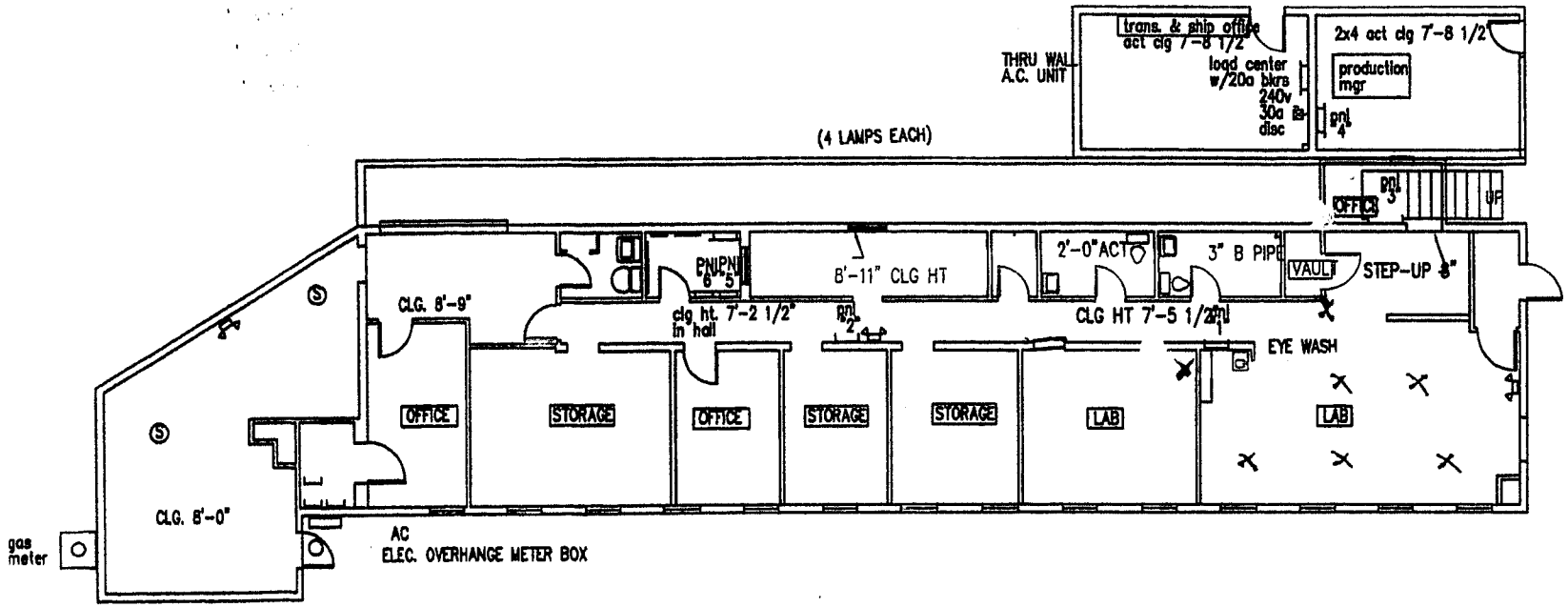


Quality Control Lab



Quality Control Lab

(Highlighted red X indicates Satellite Accumulation)



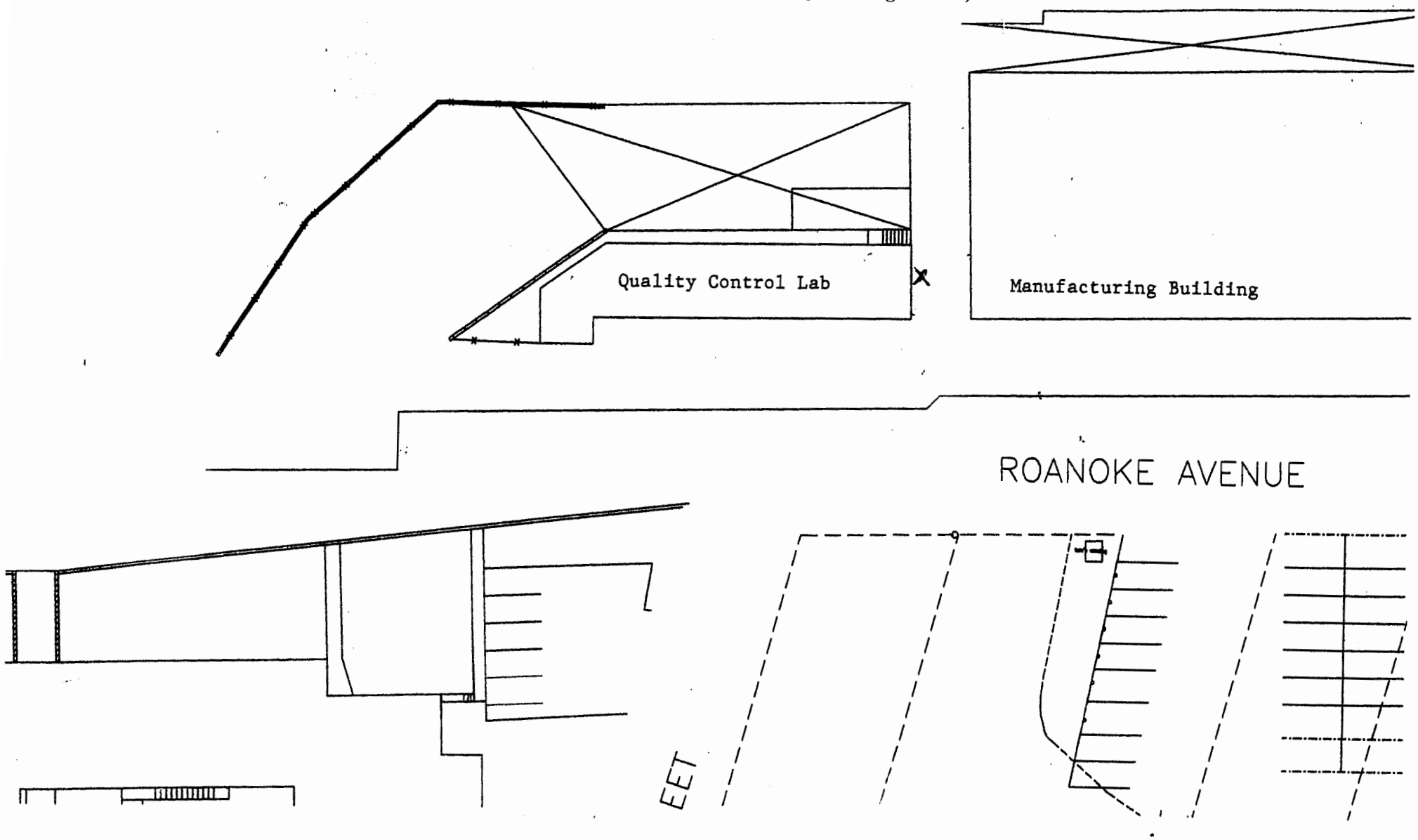
CONTROL LAB

SCALE: 1/8"=1'-0" AREA = 3,450.59 SQ.FT.

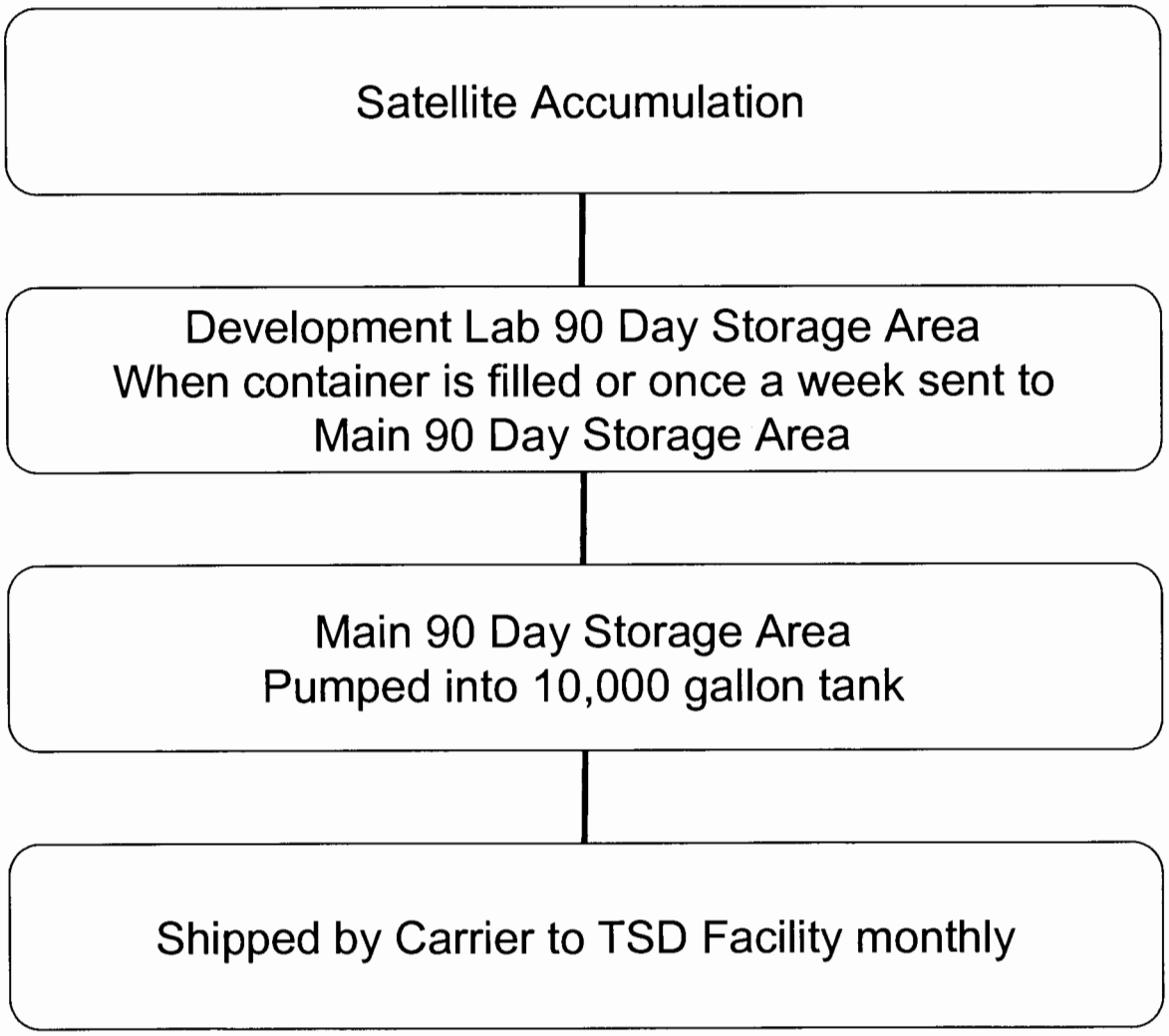
F.F 976.93

Quality Control and Manufacturing Building

(Highlighted Red X indicates 90 Day Storage Area)

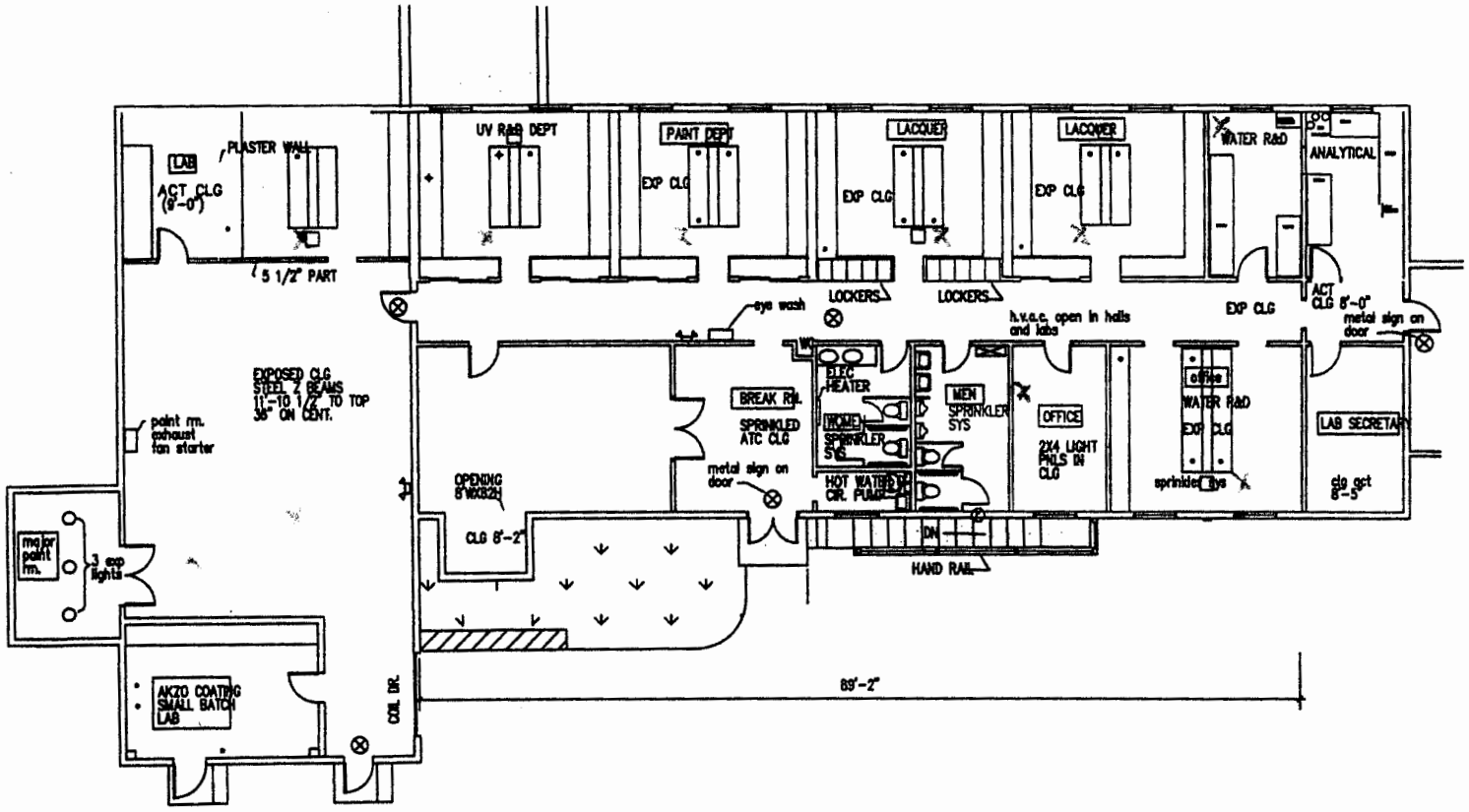


Development Lab



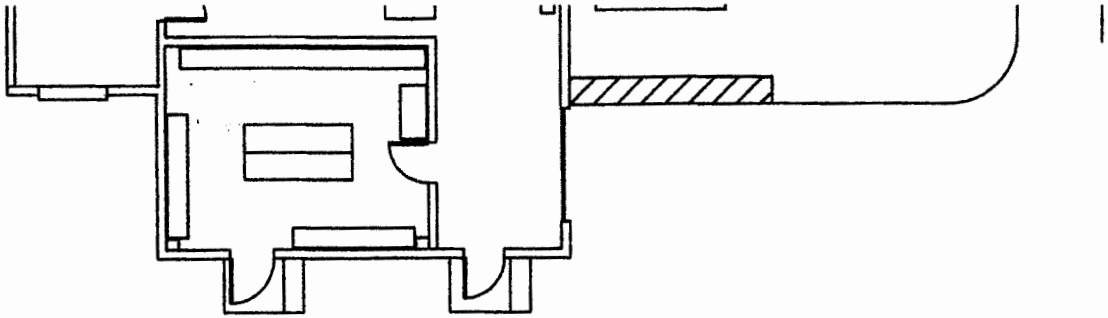
Development Laboratories

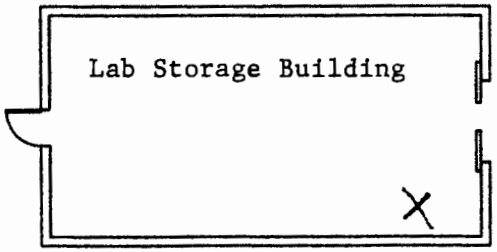
(Highlighted Red X indicates Satellite Accumulation)

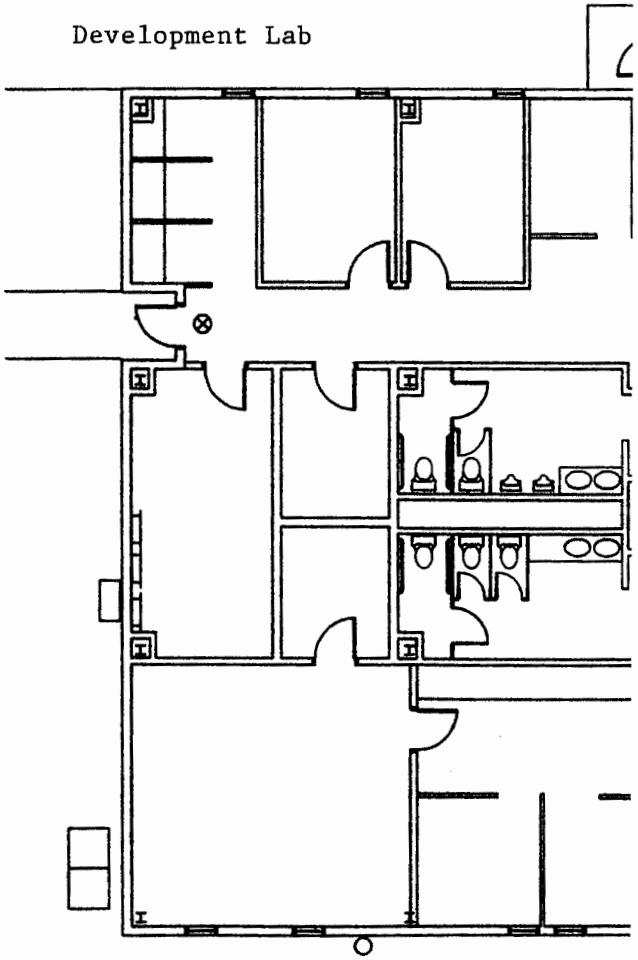


Development Lab and Lab Storage Building

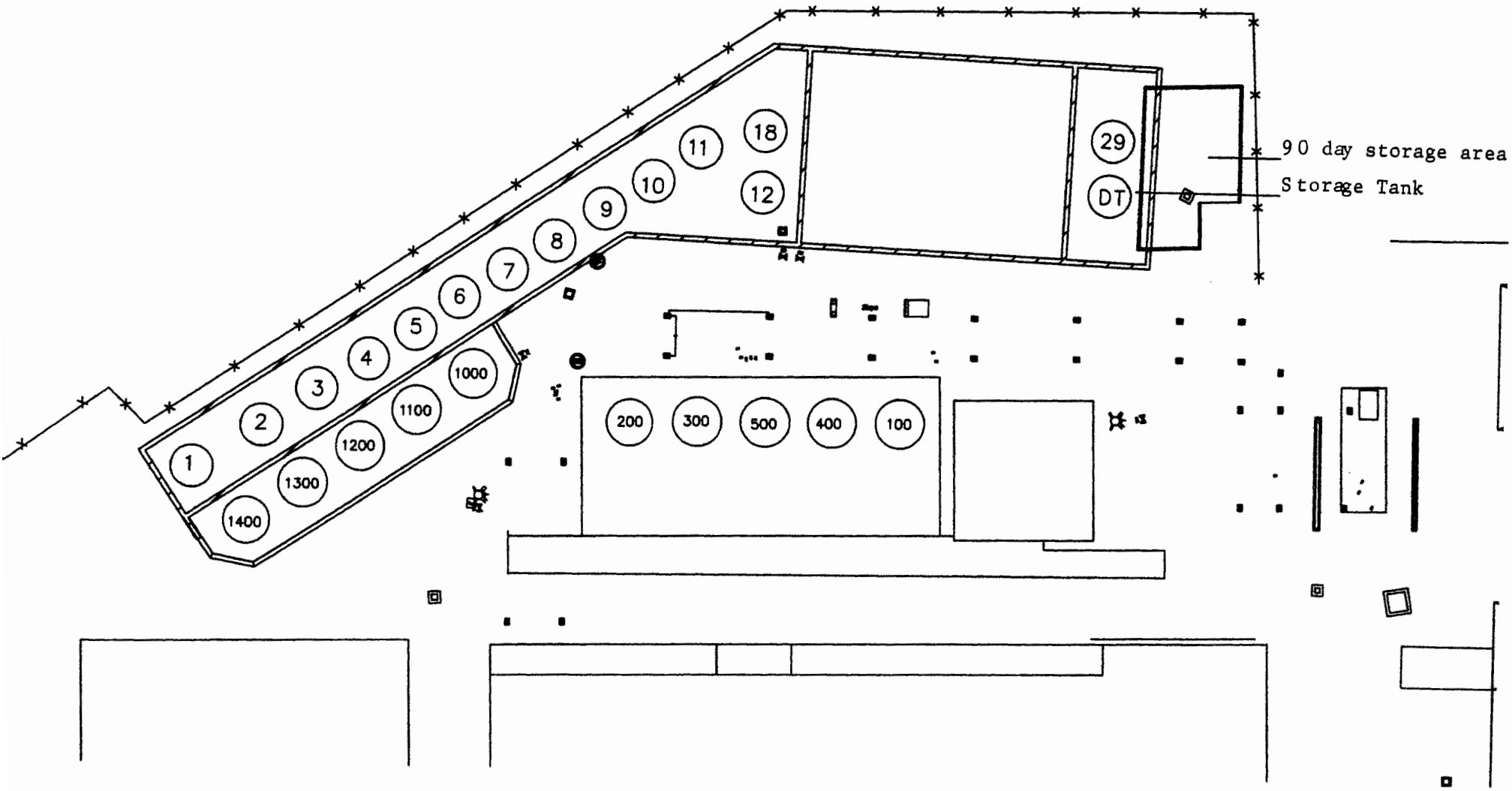
(Red X indicates 90 day storage area for lab)







10,000 gallon Hazardous Waste Tank and 90 day Storage area



Question 1b.

Provide a narrative to accompany the flow diagram that explains the movement of all hazardous waste in detail

Question 1 b.

Hazardous waste in the **Manufacturing Facility**, (lacquer, paint, stain, UV, and grinding departments) is generated by the washing of tanks and various mixing equipment (such as measuring containers, spatulas, etc.) with solvent. The wash solvent contains a mixture of solvents including but not limited to methyl ethyl ketone (MEK), acetone, xylene, toluene, methonol and acetates and is reused until it can no longer be effectively used for cleaning purposes. This wash solvent is used in wash tanks and five gallon buckets for washing necessary production utensils. The wash solvent is also used in the mixing tanks to wash the tank, therefore making the tank clean prior to making another batch of product in the tank.

When the solvent can no longer be used for washing, it is drained into 5 gallon buckets and taken to the 55 gallon satellite accumulation drum. The solvent is poured from the 5 gallon bucket into the 55 gallon satellite accumulation drums. Satellite accumulation areas are located throughout the facility. The location of the satellite areas are indicated in the drawings attached with Question 1A.

The satellite drums are dated and removed daily (or more often if requested by the department foreman) by the Hazardous Waste Material Coordinator. The drums are taken to the 90 day storage area indicated on the drawings attached with Question 1A. The drums are pumped daily into the 10,000 gallon storage tank, indicated in the drawings attached with Question 1A. Approximately every 5 weeks, a tanker is filled with material from the 10,000 gallon storage tank and sent to a Treatment Storage Disposal (TSD) facility for fuel blending.

Additionally, hazardous waste is generated by the disposal of obsolete or out-of-spec raw materials. These materials are labeled, dated with hazardous material labels and placed in the 90 day Main Storage area. If the material is fluid enough to be pumped, the waste is pumped into the 10,000 gallon hazardous waste storage tank. If the material is not fluid enough to be pumped, it is sent off-site in 55 gallon drums to an approved TSD facility.

If a production batch is deemed out-of-spec by the Technical Department and not usable by our customer, it is filled off into drums and placed in the work-off area. The Waste Minimization Manager will determine if the material can be worked off into another product. If it is deemed that it can't be worked off into another product, it will be declared hazardous waste, properly labeled, taken out of the work-off area and sent to the 90 day storage area to be disposed off. If the material is fluid enough to be pumped, the waste is pumped into the 10,000 gallon hazardous waste storage tank. If the material is not fluid enough to be pumped, it is sent off-site in 55 gallon drums to an approved TSD facility.

Hazardous waste in the **Quality Control Lab** is generated by washing mixing containers and utensils with the solvent MEK. The big lab has 2 wash tanks and the smaller lab has 1 wash tank for this purpose. When the solvent is no longer effective as a wash solvent, it is placed in a 55 gallon drum located in the 90 day storage area located outside the main door entering the Quality Control Lab. The drum is dated from the beginning of its use. When the drum is filled or at the end of 1 week (whichever is sooner), the drum is moved from the 90 day storage area outside the Quality Control Lab to the 90 day Main Storage area to be shipped off-site. It is important to note that the date written on the hazardous waste label on the drums never changes. It is only stored for a maximum of 90 days, no matter what location it is stored. The location of the 90 day storage area outside the Quality Control Lab is indicated on the attached drawing with Question 1A.

Hazardous waste is also generated by disposing of retains (1/2 pint samples of each production batch) and old batches of standard products, which have been deemed unusable for original purpose. This material is placed into a 55 gallon drum located in the 90 day storage area outside of the Quality Control lab. When the drum is filled or at the end of 1 week (whichever is sooner), the drum is moved from the 90 day storage area in the lab shed to the 90 day Main Storage area to be shipped off-site. It is important to note that the date written on the hazardous waste label on the drums never changes. It is only stored for a maximum of 90 days, no matter what location it is stored. The location of the 90 day storage area in the lab shed is indicated on the attached drawing with Question 1A.

Hazardous waste in the **Development Lab** is generated by washing mixing containers and utensils with a wash solvent mixture (including but not limited to MEK, acetone, toluene, methanol and other solvents). Each lab has a wash tank for this purpose. When the solvent is no longer effective as a wash solvent, it is placed in a 55 gallon drum located in the 90 day storage area in the lab shed. The drum is dated from the beginning of its use. When the drum is filled or at the end of 1 week (whichever is sooner), the drum is moved from the 90 day storage area in the lab shed to the 90 day Main Storage area to be shipped off-site. It is important to note that the date written on the hazardous waste label on the drums never changes. It is only stored for a maximum of 90 days, no matter what location it is stored. The location of the 90 day storage area in the lab shed is indicated on the attached drawing with Question 1A.

Hazardous waste is also generated by disposing of small batches of test products and old batches of standard products, which have been deemed unusable for original purpose. This material is placed in satellite containers (5 gallon buckets located in each laboratory). At the end of each working day, this material is emptied into a 55 gallon drum located in the 90 day storage area in the lab shed. When the drum is filled or at the end of 1 week (whichever is sooner), the drum is moved from the 90 day storage area in the lab shed to the 90 day Main Storage area to be shipped off-site. It is important to note that the date written on the hazardous waste label on the drums never changes. It is only stored for a maximum of 90 days, no matter what location it is stored. The location of the 90 day storage area in the lab shed is indicated on the attached drawing with Question 1A.

2

a. Please describe the specific contents of the waste stream collected in the Main Hazardous Waste Storage Tank, indicating if it is a hazardous waste and identifying all applicable hazardous waste codes.

The contents of the waste stream in the Main Hazardous Waste Storage Tank is a blend of the following solvents: mineral spirits, methyl ethyl ketone (MEK), acetone, butyl acetate, ethanol, propanol, toluene, butyl alcohol, methyl propyl ketone, methyl amyl ketone (MAK), ethyl acetate, methyl alcohol (methanol) and methyl isobutyl ketone (MIBK). In addition to these solvents, there are also earth pigments, plastizers, monomers and flatting agents.

The products mentioned above would fall into the following Hazardous Waste Codes: F003; F005; D001; D035

b. Please describe in detail any containers used to store the material that is withdrawn from the Main Hazardous Waste Storage Tank.

There is no material removed from the main hazardous waste storage tank and stored in any other container. Approximately every 5 weeks, a tanker is filled with material from the 10,000 gallon storage tank and sent to a Treatment Storage Disposal (TSD) facility for fuel blending.

c. Provide a detailed list of all equipment, as defined in 40 C.F.R. § 264.1031, associated with the Main Hazardous Waste Storage Tank.

The following is a list of equipment as defined in 40 C.F.R. § 264.1031 associated with the Main Hazardous Waste Storage Tank.

Hazardous Waste Tank
Gate valve 1
Gate valve 2
Plug 1
Plug 2
Manhole cover
Conservation vent
4" Inspection plug
2" Pipe plug top of tank

Input
Input elbow 90-1
Flange top of tank
Input elbow 90 -2
Input elbow 90-3
Input valve-1
Input coupling-1
Input T-1
Input valve-2
Input elbow-90-4
One way valve-1
Input T-2
Input hose coupling-2
Input pump-1
Input hose coupling-4
Input hose valve-3
Input hose coupling-4
Input T-3

Output
Output valve-1
Output-1
Output elbow90-1
Output elbow 90-2
Output valve-2
Output reducer-1
Output coupliing-1

d. Provide information/documentation demonstrating that the Main Hazardous Waste Storage Tank and its associated equipment is or is not exempt from air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050.

The requirements in 40 C.F.R. § 265.1050 and the related information was reviewed when the regulations were published. At that time, it was determined that the storage tank and related equipment were not exempt from air emission standards for equipment leaks.

e. If the facility has determined this equipment is exempt, please provide the waste analysis plan, as specified in 40 C.F.R. § 265.1063(d), along with either the sample results or process knowledge documentation upon which the exemption is based.

Does not apply

f. If the facility has determined the facility is not exempt, please provide documentation, as of April 12, 2005, to support that the ancillary equipment associated with this waste stream was fulfilling the requirements of the air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050.

See attached documents to support that equipment was and continues to be monitored and inspected for equipment leaks as specified in 40 CFR § 265.1050.

Leak Detection Inspection Log

40 CFP 64 (d) and (g) (4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) LEL /O2	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	< 10,000	
gate valve2	4" Ball Valve	SW	"	N/A	< 10,000	
Input						
valve - 1 #3	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2 #4	4" Ball Valve	SW	"	/N/A	< 10,000	
valve - 3 #5	4" Ball Valve	SW	"	N/A	< 10,000	
One way valve #6	2" Ball Valve	SW	"	N/A	< 10,000	
Sample valve #7	1" Ball Valve		"			
Output						
valve - 1 #1	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2 #2	4" Ball Valve	SW	"	N/A	< 10,000	
		Weekly Pump Seal Visual Inspection				

Date	Seal ID#	Potential Leak (ID#)		LDR Form Control, No. (if leak detected)			
	pump seal - 1						
5-2				SW			
5-9				SW			
5.16				SW			
5 23				SW			
5.31				SW			

Date MAY. 05

Akzo Nobel Coatings, Inc.
Roanoke VA

Leak Detection Inspection Log

40 CFP 64 (d) and (g) (4)

Note: for instrument readings at or above 10.000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) LEL /O2	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1 #3	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #4	4" Ball Valve	SW	"	/N/A	<10,000	
valve - 3 #5	4" Ball Valve	SW	"	N/A	<10,000	
One way valve #6	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve #7	1" Ball Valve		"			
Output						
valve - 1 #1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				

Date	Seal ID#	Potential Leak (ID#)	LDR Form Control, No. (if leak detected)			
	pump seal - 1					
6-5			SW			
6-12			SW			
6-19			SW			
6-21			SW			

Date June 6-05

Akzo Nobel Coatings, Inc.
Roanoke VA

Leak Detection Inspection Log

40 CFP 64 (d) and (g) (4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) LEL /O2	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1 #3	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #4	4" Ball Valve	SW	"	/N/A	<10,000	
valve - 3 #5	4" Ball Valve	SW	"	N/A	<10,000	
One way valve #6	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve #7	1" Ball Valve		"			
Output						
valve - 1 #1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				

Date	Seal ID#	Potential Leak (ID#)	LDR Form Control, No. (if leak detected)			
	pump seal - 1					
7-6			SW			
7-13			SW			
7-20			SW			
7-22			SW			

Date 7-6-05

Akzo Nobel Coatings, Inc.
Roanoke VA

Leak Detection Inspection Log

40 CFP 64 (d) and (g) (4)

Note: for instrument readings at or above 10.000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) LEL /O2	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1 #3	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #4	4" Ball Valve	SW	"	/N/A	<10,000	
valve - 3 #5	4" Ball Valve	SW	"	N/A	<10,000	
One way valve #6	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve #7	1" Ball Valve		"			
Output						
valve - 1 #1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				

Date	Seal ID#	Potential Leak (ID#)	LDR Form Control, No. (if leak detected)			
	pump seal - 1					
8-4			SW			
8-11			SW			
8-18			SW			
8-25			SW			

Date 8-4-05

Akzo Nobel Coatings, Inc.
Roanoke VA

Leak Detection Inspection Log

.40 CFP 64 (d) and (g) (4)

Note: for instrument readings at or above 10.000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) LEL /O2	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	<10,000	
gate valve2	4" Ball Valve	SW	"	N/A	<10,000	
Input						
valve - 1 #3	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #4	4" Ball Valve	SW	"	/N/A	<10,000	
valve - 3 #5	4" Ball Valve	SW	"	N/A	<10,000	
One way valve #6	2" Ball Valve	SW	"	N/A	<10,000	
Sample valve #7	1" Ball Valve		"			
Output						
valve - 1 #1	4" Ball Valve	SW	"	N/A	<10,000	
valve - 2 #2	4" Ball Valve	SW	"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				

Date	Seal ID#	Potential Leak (ID#)	LDR Form Control, No. (if leak detected)			
	pump seal - 1					
9-6			SW			
9.13			SW			
9.20			SW			
9.27			SW			

Date 9-6-05

Akzo Nobel Coatings, Inc.
Roanoke VA

Leak Detection Inspection Log

40 CFP 64 (d) and (g) (4)

Note: for instrument readings at or above 10.000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) LEL /O2	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve	SW	"	N/A	< 10,000	
gate valve2	4" Ball Valve	SW	"	N/A	< 10,000	
Input						
valve - 1 #3	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2 #4	4" Ball Valve	SW	"	/N/A	< 10,000	
valve - 3 #5	4" Ball Valve	SW	"	N/A	< 10,000	
One way valve #6	2" Ball Valve	SW	"	N/A	< 10,000	
Sample valve #7	1" Ball Valve	SW	"		< 10,000	
Output						
valve - 1 #1	4" Ball Valve	SW	"	N/A	< 10,000	
valve - 2 #2	4" Ball Valve		"	N/A	< 10,000	
		Weekly Pump Seal Visual Inspection				

	Date	Seal ID#	Potential Leak (ID#)	LDR Form Control, No. (if leak detected)			
		pump seal - 1					
SW	10-7-05						
SW	10-14-05						
SW	10-21-05						
SW	10-28-05						

Date 10-2-05

Akzo Nobel Coatings, Inc.
Roanoke VA

Leak Detection Inspection Log

.40 CFP 64 (d) and (g) (4)

Note: for instrument readings at or above 10,000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) LEL /O2	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve		"	N/A	<10,000	
gate valve2	4" Ball Valve		"	N/A	<10,000	
Input						
valve - 1 #3	4" Ball Valve		"	N/A	<10,000	
valve - 2 #4	4" Ball Valve		"	/N/A	<10,000	
valve - 3 #5	4" Ball Valve		"	N/A	<10,000	
One way valve #6	2" Ball Valve		"	N/A	<10,000	
Sample valve #7	1" Ball Valve		"			
Output						
valve - 1 #1	4" Ball Valve		"	N/A	<10,000	
valve - 2 #2	4" Ball Valve		"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				

Date	Seal ID#	Potential Leak (ID#)	LDR Form Control, No. (if leak detected)			
11-4 SW	pump seal - 1					
11-11 SW						
11-18 SW						
11-23 SW						

Date 11-4-05

Akzo Nobel Coatings, Inc.
Roanoke VA

Leak Detection Inspection Log

40 CFP 64 (d) and (g) (4)

Note: for instrument readings at or above 10.000 ppm, a Positive Leak Form must be completed.

Equipment ID Number	Equipment Description	Instrument Operator	Instrument (manufacturer and model) LEL /O2	Background Instrument Reading (ppm)	Max. Leak Check Instrument Reading (ppm)	Positive Leak Detection and Repair Form Control No.
Pumping Station						
gate valve1	4" Ball Valve		"	N/A	<10,000	
gate valve2	4" Ball Valve		"	N/A	<10,000	
Input						
valve - 1 #3	4" Ball Valve		"	N/A	<10,000	
valve - 2 #4	4" Ball Valve		"	/N/A	<10,000	
valve - 3 #5	4" Ball Valve		"	N/A	<10,000	
One way valve #6	2" Ball Valve		"	N/A	<10,000	
Sample valve #7	1" Ball Valve		"		<10,000	
Output						
valve - 1 #1	4" Ball Valve		"	N/A	<10,000	
valve - 2 #2	4" Ball Valve		"	N/A	<10,000	
		Weekly Pump Seal Visual Inspection				

Date	Seal ID#	Potential Leak (ID#)		LDR Form Control, No. (if leak detected)			
12-2 SW	pump seal - 1						
12-9 SW							
12-16 SW							
12-23 SW							
12-30 SW							

Date 12-2-05

Akzo Nobel Coatings, Inc.
Roanoke VA

g. Please describe in detail any and all measures the facility has instituted since April 12, 2005, to document that the ancillary equipment associated with this waste stream is fulfilling the requirements of the air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050.

All components of the Hazardous Waste Transfer system continue to be monitored and inspected for equipment leaks. Since April 12, 2005 all components of the Hazardous Waste Transfer system have been tagged. This fulfills the requirements of the air emission standards for equipment leaks

h. Please provide the date when the storage of hazardous waste in the Hazardous Waste Tank first commenced.

The storage of hazardous waste in the storage tank began in 1986.