TSD File Inventory Index

Date: March 7, 2000

Initial: C M Gonzalez

Facility Name:	BASF Corporation (Bourke Facility-One Folder Site)
Facility Identification Number:	MID 007 138 746

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

Total -1

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

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folder per schedule.

Public Participation

IDEA Detailed Facility Report

Report Error | Data Dictionary

For Public Release - Unrestricted Dissemination Report Generated on 08/15/2002

Facility Permits and Identifiers

Interpreting table data.

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
.	FRS	110000407168	BASF CORPORATION	3301 BOURKE AVE.	DETROIT	MI	48238
CAA	AFS	2616300246	BASF CORP	3301 BOURKE AVE	DETROIT	MI	48238
RCRA	BRS	MID007138746	BASF CORPORATION, BOURKE AVE. PLANT	3301 BOURKE AVENUE	DETROIT	MI	48238
RCRA	RCR	MID007138746	BASF CORP	3301 BOURKE AVE	DETROIT	MI	48238
EP313	TRI	48238BSFCR3301B	BASF CORP.	3301 BOURKE AVE.	DETROIT	MI	48238

Facility Characteristics

Interpreting table data.

Statute	Source ID	Facility Status	Permit Expiration Date	Lat/Long	Indian Lands?	Primary SIC	Secondary SICs
.	110000407168	.	.	LRT lat: 42.3988 LRT long: -83.1331	NA	.	.
CAA	2616300246	Operating, Major (Fed. Rep.)	.	.	NA	2851	2821
RCRA	MID007138746	LQG	.	lat: 42.3989 long: -83.1331	No	2821	2851
EP313	48238BSFCR3301B	.	.	lat: 42.3844 long: -83.1375	NA	.	.

Inspection and Enforcement Summary Data

Interpreting table data.

Statute	Source ID	RECAP Insp. Last 05Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
CAA	2616300246	3	09/21/2000	0	$00
RCRA	MID007138746	0	07/30/1992	0	$00

Inspection History (05 years)

Interpreting table data.

Statute	Source ID	Inspection Type	Lead Agency	Date
CAA	2616300246	STATE INSPECTION - LEVEL 2 OR GREATER	State	08/05/1998
CAA	2616300246	STATE INSPECTION - LEVEL 2 OR GREATER	State	08/23/1999
CAA	2616300246	STATE INSPECTION - LEVEL 2 OR GREATER	State	09/21/2000

Entries in *italics* are not considered inspections in Reporting for Enforcement and Compliance Assurance Priorities (RECAP) official counts.

Compliance Summary Data

Interpreting table data.

Statute	Source ID	Current SNC/HPV?	Current Quarter	Description	Qtrs in NC (of 8)
CAA	2616300246	NO	Jul-Sep02	.	0
RCRA	MID007138746	NO	Apr-Jun02	.	0

Two Year Compliance Status by Quarter

Interpreting table data.

AIR Compliance Status								
Statute:Source ID CAA: 2616300246	QTR1 Oct-Dec00	QTR2 Jan-Mar01	QTR3 Apr-Jun01	QTR4 Jul-Sep01	QTR5 Oct-Dec01	QTR6 Jan-Mar02	QTR7 Apr-Jun02	QTR8 Jul-Sep02
Program/Pollutant in Current Violation								
SIP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP

Formal Enforcement Actions (05 year history)

Interpreting table data.

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data records returned.						

EPA Civil Docket Cases (05 year history)

Interpreting table data.

Primary Law/Section	Case Number	Case Type	Case Name	Issued/Filed Date	Settlement Date	Penalty	SEP Cost
- No data records returned.							

History of Reported Chemicals Released in Pounds per Year at Site:48238BSFCR3301B

Interpreting table data.

Chemical releases reported by TRI are not associated with non-compliance for that facility.

Year	Total Air Emissions	Surface Water Discharges	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers	Total Releases and Transfers
1992	243,855	.	.	.	243,855	6,627,185	6,871,040
1993	275,309	.	.	.	275,309	4,800,700	5,076,009
1994	360,650	.	.	.	360,650	3,720,775	4,081,425
1995	271,240	.	.	.	271,240	3,157,640	3,428,880
1996	132,312	.	.	.	132,312	3,832,940	3,965,252
1997	135,329	.	.	.	135,329	2,862,661	2,997,990
1998	44,660	.	.	.	44,660	1,870,850	1,915,510
1999	26,153	.	.	.	26,153	1,099,309	1,125,462
2000	7,858	.	.	.	7,858	208,750	216,608

TRI Total Releases and Transfers by Chemical and Year

Chemical releases and transfers are in pounds except where otherwise noted.

Chemical Name	1992	1993	1994	1995	1996	1997	1998	1999	2000
BARIUM COMPOUNDS	36,995								
CHROMIUM COMPOUNDS(E	22,011								
CERTAIN GLYCOL ETHER	31,985		897,705	180,365	191,355	91,442	38,150	19,280	
LEAD COMPOUNDS		1,119							
FORMALDEHYDE					37,320				
METHANOL	190,405	1,163,060	35,425	115,745	64,755	79,415	50,683	27,123	5,863
N-BUTYL ALCOHOL	1,336,650	631,450	195,320	456,380	232,005	433,023	199,711	128,761	27,465
METHYL ETHYL KETONE	2,874,505	988,395	1,117,655	908,205		40,377	32,801	13,353	
ACRYLIC ACID	402								
METHYL METHACRYLATE	2,365	28,405							
1,2,4-TRIMETHYLBENZE	15,175	133,445	49,255	272,710	165,155	85,761	122,350	52,620	13,399
CUMENE	20,035	16,781	18,305	2,320	14,000	8,658	5,280	2,900	
ETHYLBENZENE	151,265	148,435	62,505	266,755	252,755	512,735	365,300	158,050	31,433
STYRENE	575	148,254							
METHYL ISOBUTYL KETO						65,007	27,681	20,601	
TOLUENE				665	2,310	64,009	72,474	37,161	
BUTYL ACRYLATE	8,867								
N-METHYL-2-PYRROLIDO					53,755	56,429	53,480	19,273	6,728
XYLENE (MIXED ISOMER	2,179,805	1,816,665	1,705,255	1,225,735	2,926,700	1,561,134	947,600	646,340	131,720
COPPER					25,142				

Demographic Profile of Surrounding Area

Interpreting table data.

This section is to provide context regarding the community setting of the facility. No relationship between this information, and other data included in this report is implied. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table(LRT) when available. N/A = Not yet available from the Census Bureau for 2000 Census.

Radius of Area:	3 Miles	Land Area:	100.00%	Households in area:	N/A
Center Latitude:	42.3988	Water Area:	0.00%	Housing units in area:	90,761
Center Longitude:	-83.1331	Population Density:	7980.78/sq. mi.	Households On Public Assistance:	N/A
Total Persons:	221,485	Percent Minority:	97.01%	Persons Below Poverty Level:	N/A

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	6,794 (3.07%)	Child 5 years and less:	16,895 (7.63%)
African-american:	209,517 (94.60%)	Minors 17 years and younger:	66,256 (29.91%)
Hispanic-Origin:	1,595 (0.72%)	Adults 18 years and older:	154,298 (69.67%)
Asian/Pacific Islander:	456 (0.21%)	Seniors 65 years and older:	18,143 (8.19%)
American Indian:	501 (0.23%)		
Other race:	4,217 (1.90%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown:	Households (%)
Less than 9th grade:	N/A	Less than $15,000:	N/A
9th-12th grades:	N/A	$15,000-$25,000:	N/A
High School Diploma:	N/A	$25,000-$50,000:	N/A
Some College/2-yr:	N/A	$50,000-$75,000:	N/A
B.S./B.A. or more:	N/A	Greater than $75,000:	N/A

Please Note: Entries in gray denote records that are not federally required to be reported to EPA. These data may not be reliable.

Map It

This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: AFS : 07/19/2002. RCRAInfo : 07/19/2002. NCDB refresh date: 07/13/2002.

Search EPA Home Site Map OECA Feedback

C.2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF LIBRARY: Detroit Public Library, Main, Sherwood Forrest, Parkman,
LIBRARY CONTACT: and Hubbard Branches. Doris Detwiler, Reference Division,
LIBRARY LOCATION: Sociology and Economics Department, 5201 Woodward Avenue, Detroit, Michigan 48202

FACILITY NAME: Glasurit America, Incorporated
FACILITY LOCATION: 3301 Bourke Street, Detroit, Michigan 48238
FACILITY U.S. EPA ID NO: MID007138746

MATERIALS RECEIVED: Four Sets Of:

Public Notice
Closure Plan
Background Materials
Return Envelopes
Verification Sheet

RECEIVED
MAR 09 1984
WASTE MANAGEMENT BRANCH

**DATE RECEIVED: Mar 6, 1984

**DATE OF PUBLIC AVAILABILITY: SAME

**SIGNATURE OF RECEIVING PARTY: Sue Haag

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID ENVELOPE) TO:

U.S. ENVIRONMENTAL PROTECTION AGENCY
230 SOUTH DEARBORN
5HW-13
CHICAGO, ILLINOIS 60604

ATTENTION: DIANE SHARROW

C.1 closed

MID007138746

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

RECEIVED
MAY 14 1984
WASTE MANAGEMENT BRANCH

NAME OF LIBRARY: Detroit Public Library, Main, Sherwood Forrest, Parkman,
LIBRARY CONTACT: and Hubbard Branches. Doris Detwiler, Reference Division,
LIBRARY LOCATION: Sociology and Economics Department, 5201 Woodward Avenue, Detroit, Michigan 48202

FACILITY NAME: Glasurit America, Incorporated
FACILITY LOCATION: 3301 Bourke Street, Detroit, Michigan 48238
FACILITY U.S. EPA ID NO: MID007138746

MATERIALS RECEIVED: Four Sets Of:

Public Notice
Closure Plan
Background Materials
Return Envelopes
Verification Sheet

**DATE RECEIVED: 2/25/84

**DATE OF PUBLIC AVAILABILITY: 2/25/84 to 5/11/84

**SIGNATURE OF RECEIVING PARTY: Doris Detwiler

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID ENVELOPE) TO:

U.S. ENVIRONMENTAL PROTECTION AGENCY
230 SOUTH DEARBORN
5HW-13
CHICAGO, ILLINOIS 60604

ATTENTION: DIANE SHARROW

MAR 13 1984

5HW-13

Mr. Arthur W. Hargate, Jr.
Liberty Solvents and Chemicals Company
9429 Ravenna Road
Twinsburg, Ohio 44087

RE: Freedom of Information Act Request
RIN-93-84

Dear Mr. Hargate:

This is in response to your letter of February 10, 1984, addressed to William H. Miner of this Agency. Enclosed please find documents dealing with the following facilities for which you requested information:

Solvent Distillers
421 Lycaste Street
Detroit, Michigan 48214
MID980684088

Glasurit
3301 Bourke
Detroit, Michigan 48238
MID007138746

Petro-Chem Processing
421 Lycaste Street
Detroit, Michigan 48214
MID980615298

The enclosed list indicates the documents being supplied. Your request for general comments is not a document and thus is not a part of this Freedom of Information Act response.

There is no charge for search time or duplication because the total fees are less than $10.00. Please contact Augusta Bloom of my staff at (312) 886-4186, if you have any questions.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosures

cc: Solvent Distillers
Glasurit
Petro-Chem Processing
Michigan Department of Natural Resources

bcc: N. Sullivan, OPA
C. Kavcic, WMD
J. Boyle, STU#3
Files (3)

Enclosures

Solvent Distillers

1. Notification (8700-12) (2 pages)

2. Notification (8700-12) (2 pages)

3. Phone memo dated April 15, 1983, to Art Kawatachi from Rich Powals (1 page)

Glasurit

4. Letter dated January 6, 1984, from Allen C. Kinsler to Regional Administrator (1 page)

5. Letter dated October 26, 1983, from Susan Norton to Allen Kinsler (3 pages)

6. Public Notice (2 pages)

Petro-Chem Processing

7. Letter dated December 21, 1981, from Sandra Gardebring to Joseph Polito (2 pages)

8. Letter dated July 14, 1982, from Gordon Davidson to Norman Foster (1 page)

9. RCRA Inspection Report, dated January 25, 1983 (14 pages)

10. Letter dated January 27, 1983, from Kenneth Burda to Norman Foster (2 pages)

11. Letter dated March 31, 1983, from Norman Foster to Basil G. Constantelos (2 pages)

12. Letter dated October 17, 1983, from Richard Powals to Susan Norton (2 pages)

13. Letter dated November 4, 1983, from Susan Norton to Richard Powals (2 pages)

14. Letter dated November 17, 1982, from William Miner to Norman Foster (1 page)

15. Letter dated February 3, 1984, from William Miner to Richard Powals with enclosure (4 pages)

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

REPLY TO ATTENTION OF:
5HW-13

Ms. Doris Detwiler
Detroit Public Library
Reference Division
Sociology and Economics Department
5201 Woodward Avenue
Detroit, Michigan 48202

Dear Ms. Detwiler:

Pursuant to my telephone conversation with you on February 15, 1984, I am sending you copies of the Closure Plan and related background materials for the Glasurit America, Incorporated Plant. These materials are to be made available to the public for review and comment through April 5, 1984, at the following four branches of the Detroit Public Library: the Main Branch, the Sherwood Forrest Branch, the Parkman Branch, and the Hubbard Branch. I am also enclosing an advance copy of the Public Notice, advising the public of the availability of the enclosed materials at these four library branches. The Public Notice is scheduled to be published in the Detroit News on March 5, 1984.

Please return these materials in the enclosed self-addressed envelopes following the close of the 30-day comment period on April 5, 1984. Please inform me that you have received these materials by completing and signing the enclosed verification form. The form should be returned to me in the enclosed self-addressed, postage, and fees paid envelope.

Thank you very much for your cooperation in assisting our effort to serve the public.

Sincerely,

Diane M. Sharrow
Environmental Protection Assistant

Enclosures

'L'

THE DETROIT NEWS
P.O. BOX 77840 DETROIT, MICH. 48277

ADVERTISING INVOICE

NO OTHER CHARGES ARE INCLUDED ON THIS BILL

NAME					
U.S. ENVIRONMENTAL PROTECTION A					
INVOICE NUMBER	CLASS	DESCRIPTION			
409915031713	0023	PUBLICNOTI			
BILLING DATE	START DATE	LAST DATE	LINES	TIMES	CHARGES
4/10/84	0408	0408	73	1	64459
K-0408		THIS AMOUNT DUE AND PAYABLE NOW ▶			64459

DETACH ALONG PERFORATED LINE

RETURN THIS PORTION WITH YOUR REMITTANCE (OVER)

ADVERTISING INVOICE

THE DETROIT NEWS
P.O. BOX 77840 DETROIT, MICH. 48277

INVOICE NUMBER	BILLING DATE	TOTAL CHARGES
409915031713	4/10/84	644.59

TERMS:

FOR ANY ADJUSTMENT OR INFORMATION ON THIS BILL 977-7550
TO PLACE AN AD 977-7500

ANY CLAIMS REGARDING THIS INVOICE MUST BE MADE WITHIN 30 DAYS OF BILLING DATE.

TO:

U.S. ENVIRONMENTAL PROTECTION A
WASTE MGMT. BRANCH
230 S. DEARBORN
CHICAGO, ILL. 60604

409915031713 0064459

KEEP THIS PORTION FOR YOUR RECORDS

GIVE NUMBER ▶

Other Rates		inch, square, word, folio)	COST PER UNIT	TOTAL COST
	FIRST INSERTION		$	$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			$

Attach one copy of advertisement *(including upper and lower rules)* to each copy of voucher here. If copy is not available sign the following affidavit.

TOTAL LINE RATES AND OTHER RATES	
LESS DISCOUNT AT %	
BALANCE DUE	$
VERIFIED *(Initials)*	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE Marlene Solomon

TITLE Classified Bookkeeper DATE April 13, 1984

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION	PAID BY CHECK NUMBER

Estimate: $4.24 per line / 5 words per line
Public Notice has aproximately 60 lines
Total: $~~254.40~~ ~~542.72~~ 6840200
QTN057 4A4E05$002 2540

[1] If the ability to certify and authority to approve are combined in one person enter "N/A" *(not applicable)* here.

☆ GPO : 1980 O - 311-153 (6100)

white shaggy type, very friendly. Name-Buffy. Reward. 372-0988
LOST March 24 — Male Cocker Spaniel/Dachshund, Allen Park. Reward, 388-3921 after 5 p.m.
LOST — Mon. 26th, mixed terri-

Bloomfield Hills Board of Education
ROMEO MICH — 2.57 acres including a 1 story free standing masonry steel and mill constructed manufacturing plant

learn about our full capabilities.
Robert Jameson Associates
Private & Corporate Outplacement Services

ACCOUNTING/DATA PROCESSING ENTRY OPER.
For AP/AR, payroll, gen'l. ledger. $13,000 plus excel. fringes. Eastside Detroit firm. IBM Sys.

PUBLIC VOUCHER FOR ADVERTISING

For Agency Use Only
VOUCHER NUMBER
SCHEDULE NUMBER
PAID BY

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE
U.S. Environmental Protection Agency, Waste Management Branch

PLACE VOUCHER PREPARED
230 South Dearborn, Chicago, Illinois 60604

DATE PREPARED
02-16-84

NAME OF PUBLICATION
The Detroit News

NAME OF PUBLISHER OR REPRESENTATIVE
The Detroit News, Incorporated

ADDRESS (*Street, room number, city, State, and ZIP code*)
615 LaFayette Boulevard, Detroit, Michigan 48231 ATTN: Legal Notices
Legal Notice Section, Classified Advertising (313) 222-2095

CHARGES

TYPEFACE (*size of type*) POINT PER (*inch, square, word, or folio*)

		NUMBER OR LINES (*Indicate counted or space*)	COST PER LINE	TOTAL COST
Line Rates	FIRST INSERTION		$	$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			$
		NUMBER OF UNITS (*Indicate inch, square, word, folio*)	COST PER UNIT	TOTAL COST
Other Rates	FIRST INSERTION		$	$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			$

Attach one copy of advertisement (*including upper and lower rules*) to each copy of voucher here. If copy is not available sign the following affidavit.

TOTAL LINE RATES AND OTHER RATES	
LESS DISCOUNT AT %	
BALANCE DUE	$
VERIFIED (*Initials*)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN

DATE PUBLISHED

I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.

SIGNATURE AND TITLE OF CERTIFYING OFFICER

DATE

SIGNATURE AND TITLE OF AUTHORIZING OFFICER

DATE

ACCOUNTING CLASSIFICATION

Estimate: $4.24 per line / 5 words per line
Public Notice has aproximately 60 lines
Total: ~~$254.40~~ 542.72

6840200

QTN057 4A4E05 $002 2540

PAID BY CHECK NUMBER

*If the ability to certify and authority to approve are combined in one person enter "N/A" (*not applicable*) here.

☆ GPO : 1980 O - 311-153 (6100)

Contact: Diane Sharrow (312) 886-6944

September 1973
4 Treasury FRM 2000 Standard Form No. 1143

ADVERTISING ORDER

50148NALT
ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE
U.S. Environmental Protection Agency, Waste Management Branch

DATE
02-16-84

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN
The Detroit News

SUBJECT OF ADVERTISEMENT	EDITION OF PAPER ADVERTISEMENT APPEARED
Public Notice	P.M.
NUMBER OF TIMES ADVERTISEMENT APPEARED	**DATE(s) ADVERTISEMENT APPEARED**
Single	03-05-84

SPECIFICATIONS FOR ADVERTISEMENT

Place in Legal Notice / Classified Section

COPY FOR ADVERTISEMENT

Please See The Attached

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT
NUMBER 50148NALT	NUMBER
DATE 2-22-84	DATE
SIGNATURE OF AUTHORIZING OFFICIAL Brigitte Mazzke	TITLE

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC, D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ▶

U.S. Environmental Protection Agency
Financial Operations Section
230 South Dearborn, Chicago, IL 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

1143-107

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA), has received notice of an intended facility closure from Glasurit America, Incorporated (GAI), 3301 Bourke Avenue, Detroit, Michigan, 48238. GAI transports and stores in tanks, solvents for distillation. These solvents are considered to be hazardous wastes under Federal regulations. The closing of this facility was effected by no longer accepting hazardous wastes for distillation after February 1, 1984, and removing all distillation equipment by March 1, 1984. The storage tanks will be cleaned, sandblasted, and lined. No hazardous wastes will be stored in these tanks after cleaning. GAI will retain its EPA hazardous waste identification number and generator status, since it will continue to produce hazardous wastes. These accumulated wastes are a by-product of GAI's paint manufacturing, but storage will be limited to a period less than 90 days (per 40 CFR §262.34).

The closure plan was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. The U.S. EPA required a closure plan when GAI notified the U.S. EPA of its intent to close their solvent distillation facility.

The closure plan and related background materials are available to the public at the U.S. EPA, Waste Management Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois, (312) 886-6944, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials may also be seen during business hours at the following branches of the Detroit Public Library: the Main Branch, 5201 Woodward Avenue; the Sherwood Forrest Branch, 7117 West Seven Mile Road; the Hubbard Branch, 12929 West McNichols Boulevard; and the Parkman Branch, 1766 Oakman Boulevard.

Public comments concerning the certification of this action are invited by U.S. EPA and will be accepted through April 5, 1984. Please send comments to:

U.S. Environmental Protection Agency
Region V - 5HW-13
230 South Dearborn Street
Chicago, Illinois 60604

ATTN: Diane Sharrow

MID007138746

Duane Sharrow
SHW-13

Attorneys-Legal Counseling 9

LAWLINE

FREE

PHONE CONFERENCE

- ACCIDENTS/INJURIES
- DIVORCE/CUSTODY
- DRUNK DRIVING/CRIMINAL
- BUSINESS/EMPLOYMENT
- FIRE/INSURANCE CLAIMS

644-7933

Robert D. Mouradian
Attorney-at-Law

99

UNEMPLOYMENT HEARINGS

M.E.S.C.

CLAIMS

644-3120

MARK S. GRANT, P.C.

020 Lost & Found

FOUND — Cockapoo, small gray, male, 10 ½ mi/Harper. 772-2406

FOUND — darling puppies, Alter Rd./River. Need homes. 885-4936

FOUND — Great Dane, April 3, Michigan Ave-Trumbull, 728-4578.

FOUND — Pekingese thoroughbred, S.W. Detroit. Owner identify. 843-4499

FOUND — sm. black dog, collar no tags, 6 Mi.-Livernois. 927-1287

LOST — April 1, small grey cat. Vicinity of Beiserman, N of 9 Mile, Warren, 755-3515.

LOST — Blk. female dog, Warren-Greenfield. Reward. 264-6074

LOST — Blk. Labrador Retriever "Radar", Inkster area. Reward. 535-7432 or 278-4170.

LOST — Blk. male dog w/tan face, paws, 7 Mi./Kelly, 526-6499

LOST — blk./white long hair fem. cat. "Friday", Westland. Bef. 5, 421-4400; aft 5:30; 425-3469

LOST — brown and black, full blooded shepherd, 14 mo. old, white spot under collar, name "Rocky" Reward. Houston Whittier-Dickerson area. 521-1228

LOST — choc. brown German Shepherd-Lab mix, 6 mo. old, 9 Mile-I-75 area, on 3-30-84. Reward. 399-2559 aft. 1p.m.

LOST — Cockapoo, 3-31. tan-/white, female, Martin-Harper, St. Clair Shores 772-5347

LOST — Dachshund male, brn. 13-Schoenherr area. rew. 574-0976

LOST Dog — black female, approx. 12 lbs., red collar. Detroit lic. Reward. 675-8187; 675-7050.

LOST — dog; mixed Doberman-Rottweiler; long ears, black with brown markings, bob tail. Vernor-Junction. Reward. 849-5815

LOST — female Brittany-Collie mixed. 9 Mi.-Van Dyke area. Reward. 754-2824

LOST — female Siamese cat, Gd. River-Beech area. Rew. 532-7584

LOST — Grey Tiger Cat, hit by car on Syracuse. 883-5580 days

LOST — KEESHOND, male, blk. and silver, 11 Mi.-Ryan, 573-7155

LOST-Kerry Blue Terrier named Dublin, 7 Mi/Greenfield. 836-0490

LOST — Male Collie, orange color, red collar, tags. Answers to Mickey, Telegraph-Ford Rd. area. Reward. 561-4601

LOST — Male Poodle-Sheep mixed, 6 Mi-Gratiot. Small-gray-white shaggy type, very friendly. Name-Bunny. Reward. 372-0988

LOST March 24 — Male Cocker

020 Lost & Found

LOST — Siamese cat, female, blue cream, 17/Dequindre area. Reward. Call 977-8894

LOST — small, black terrier male, (Toby), 12 yrs. old, 6 Mi.-Gratiot, reward. 371-1025

LOST — small black/white terrier mut. 21 Mi/I-94. Answers to "Barney". Reward. 949-1157

LOST — Woman's wedding band and engagement ring. Diamonds and rubies, large rew. 739-0007.

LOST — 3-29, 10 lb. shaggy white fem. mix poodle-No tags. 862-8728

MISSING — Golden Afghan dog, male, 7 mos. old, 7 Mi.-Evergreen, Lost April 4. Rew. 538-5376

WOULD The Man Who Called — the 822 number on Mon. in regards to lost dog "Hardy", PLEASE call again 822-0225

021 Industrial & Small Plant Services, Engineering Computer Time

AVAIL. Lathe Time — Bridgeport and Shaper, details, 871-0450

HAVE WORK — for small shops. Must do good work, vertical and horizontal milling, drilling, tapping, lathe, etc. Home shops welcome. Send equipment list to H. Engineering, 5239 Trumbull, Detroit. Mi. 48208

JIG GRINDING Services — close tolerance work. Call 277-1044

MACHINE shop looking for lathe, mill and grinding work. Prompt delivery. 794-2159

MFGR. — with 28 yrs. exper. [illegible] round and heart shape bender tooling desires additional work to utilize a full 2nd. shift. Rep. Box N-3933 Detroit News 48231

OPEN TIME — on Lathes and Mills. Job shop work. 549-0070

PRECISION TUBE BENDER specializing in tubes ⅛"-1" OD with round or heart shape designs has open time. Will assemble with nuts, flange, etc. Box N-3932 Detroit News 48231

PROTOTYPE machine work for small shop. 641-6718, 7-10 p.m.

022 Transportation, Travel & Tours-Airline Tickets

AAAA AUTO DRIVEAWAY Calif., Ariz., Denver, Fla., New Orleans, D.C., N.Y., all points. Vans to N.Y.C., N.J., all Gas. 22476 GRAND RIVER 532-[illegible]

AAAAA-1 AUTO TRAVEL New Cars To all points. Insured. Gas allow. 13430 E. 8 Mi. 527-840[illegible]

AACON AUTO TRANSPORT California, Arizona Gas Allowance 757-4[illegible]

AUTOS TRANSPORTED TO ALL POINTS. U.S. Low rates. Insured. Northland Auto Transporters, 540-7044

CHEAP-FAST! Round trip transportation to Atlanta. Easter w[illegible] $200. Info 865-1169 aft 6 p.m.

CONTINENTAL — Credit Coupons for sale at discount. 559-95[illegible]

DRIVING to Florida about 4-[illegible] Would like 1 passenger to share expenses. Call 469-1660.

NEED Passenger — to share expenses to Florida, 4-12. 469-16[illegible]

023 Legal Notices Bids, Proposals

INVITATION TO BID
KITCHEN EQUIPMENT:
AUTOMATIC LIDDING MACHINES

The Board of Education of Bloomfield Hills Schools is accepting firm, sealed proposals for furnishing and delivering two (2) new, latest model automatic lidding machines for Bloomfield Hills Schools.

Specifications and proposal forms can be obtained at the Business Office, Bloomfield Hills Schools, 4200 Andover Road, Bloomfield Hills, Michigan.

Proposals will be accepted until 11:00 a.m., E.S.T., Thursday, April 19, 1984 at the Bloomfield Hills Schools Business Office, 4200 Andover Road, Bloomfield Hills, Michigan. The Board of Education reserves the right to accept or reject any and all proposals or to waive any irregularities therein.

SHARON A. TOSCH, Secretary
Bloomfield Hills
Board of Education

ROMEO MICH — 2.57 acres in-

023 Legal Notices Bids, Proposals

MDSS TO ACCEPT
TRAINING PROPOSALS

Michigan Department of Social Services in Wayne County is accepting proposals from Detroit area providers with established programs and facilities to offer skills training to welfare recipients under the Michigan Opportunity and Skills Training (MOST) Program.

Additional information and contract packets may be obtained by telephoning (313) 256-1629 and asking for M.K. Hagans or John Brucker.

Proposals must be received by 5 p.m. April 20 and are to be forwarded to:

Policy Implementation Unit
Michigan Dept. Of
Social Services
1200 Sixth St., Suite 800
Detroit, MI 48226

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA), has received notice of an intended facility closure from Glasurit America, Incorporated (GAI), 3301 Bourke Avenue, Detroit, Michigan, 48238. GAI transports and stores in tanks solvents for distillation. These solvents are considered to be hazardous wastes under Federal regulations. The closing of this facility was effected by no longer accepting hazardous wastes for distillation after February 1, 1984, and removing all distillation equipment by March 1, 1984. The storage tanks will be cleaned, sandblasted, and lined. No hazardous wastes will be stored in these tanks after cleaning. GAI will retain its EPA hazardous waste identification number and generator status, since it will continue to produce hazardous wastes. These accumulated wastes are a by-product of GAI's paint manufacturing, but storage will be limited to a period less than 90 days. (per 40 CFR section 262.34).

The closure plan was submitted to satisfy regulatons promulgated under the Resource Conservation and Recovery Act, as ammended. The U.S. EPA required a closure plan when GAI notified the U.S. EPA of its intent to close their solvent distillation facility.

The closure plan and related background materials are available to the public at the U.S. EPA, Waste Management Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois, (312) 886-6944, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials may also be seen during business hours at the following branches of the Detroit Public Library: the Main Branch, 5201 Woodward Avenue; the Sherwood Forrest branch, 7117 West Seven Mile Road; the Hubbard Branch, 12929 West McNichols Boulevard; and the Parkman Branch, 1766 Oakman Boulevard.

Public comments concerning the certification of the action are invited by U.S. EPA and will be accepted through May 9, 1984. Please send comments

U.S. Environmental
Protection Agency
Region V-SHW-13
230 South Dearborn Street
Chicago, Illinois 60604
ATTN: Diane Sharrow

024 Employment Agencies & Job Information

Bernard Haldane-Exec. Job/
Career Counseling-593-1100

025 Consultants-Career Management-Resumes

A BETTER RESUME
Composed-typed-printed 524-1914

COMPLETE/PROFESSIONAL
Resume Service — 626-7719

"ONE STOP" CENTER FOR
RESUMES BROCHURES
Professionally Prepared
M/Visa 1 day service 541-4911

PROFESSIONAL RESUMES
BUDGET/CUSTOM
M.C./VISA 557-4770

RESUMES
Enhance your job search potential through our professional resume service. We are able to provide you with a resume with visual impact, a resume that represents you as a doer and achiever, and a resume with meaningful information. Call for appointment 569-5322

RESUMES
Professionally written. Your choice of type styles and paper. Cover letter included. Priced as low as $25 per 100. 759-6910

RESUMES
259-2440

100 RESUMES $24
[illegible]00 COVER LETTERS $15
Composed, typed, offset printed. Overnight service. Telephone orders. Visa/Mastercharge.
CAREER RESUMES 557-8480

026 Help Wanted

AA BANK MARKETING
To $30K. Fee Pd. 3-4 yrs. exp. in bank marketing req'd. Employment Center Agency 569-1637

AA-BANK TELLERS-
BANK PROOF OPRS. Full and part time. Suburban locations. Req'd. only. Employment Center Agency, 569-1637

ANDERSON MARINE needs full time help — Mt. Clemens 469-2570

AVIATION INSURANCE
REPRESENTATIVE

Underwriting/Sales position is available for aviation person desiring career opportunity with major aviation insurance syndicate. Beech A36TC used in service assigned territory in Michigan, Ohio and Canada. Requirements: College degree, 3 yrs. business experience (prefer aviation background), commercial pilot certificate/SEL/IFR/900 hrs. of flight experience. Send resume to:

L. Colton
A.A.U.
3155 W. Big Beaver Rd.
Troy, MI 48084

026 Help Wanted

AA-CREDIT ANALYST
$25K up. Fee Pd. 3-4 yrs. exp. consumer loans. Employment Center Agency 569-1637

AA-RATING SPECIALIST
To $26K. Fee Pd. Deg., math or statistics major, statistical exp. helpful. Employment Center Agency 569-1637 A

AA-SYSTEMS ANALYST-
PROJECT MANAGER
To $38,000. Fee Pd. 2 yrs. systems exp. in financial applications, supv. helpful. Degree in business or computer science. Employment Center Agency 569-1637

A BANK Programmer — 1-2 yrs. on job Burroughs/IBM, COBOL, financial bkgrnd. Fee pd. Employment Center II Agy. 540-4130

ACCOUNTANT
Growing Phoenix, Ariz. CPA firm needs tax and accounting/auditing personnel. Should be CPA or CPA candidate. Experience for tax should be 3-5 years and 2-3 years for accounting/auditing personnel. Send resume in confidence to: Mr. Magnan, Miller Wagner & Co., 5225 N. Central, Suite 220, Phoenix, Ariz. 85012

ACCOUNTANT
Growing Farmington CPA Firm seeks a highly qualified senior accountant for position with excellent potential. 471-7890.

ACCOUNTANT
Growing co. seeks an exper'd. accountant with strong supervisory and analytical skills to oversee busy office. Experience with a medical facility a plus. To $30K up, fee paid. Call 353-2090
Snelling & Snelling Empl. Agency
26500 Northwestern, #306
Southfield, MI. 48076

ACCOUNTANT
Large, publicly held service company has immediate opening for a supervisor, of financial reporting. Prefer 4-5 year CPA with some SEC, tax and/or PC experience. Must have excellent communication skills. Excellent compensation and advancement opportunity to coporate controllership. If interested, send resume and salary history in strictest confidence to: Mr. Perry, P.O. Box 691, Southfield, Mich. 48037

PLANTE & MORAN, an employment agency, recruiting for an equal opportunity employer

ACCOUNTANT — non-smoking for CPA office. Resume to include 1. Related experience, if any. 2. Personal data 3. Sample of handwriting. Gordon L. Holander CPA, 19675 W. 10 Mile Rd., Suite 402, Southfield, MI. 48075

ACCOUNTANTS
CPA Firm located in Southfield Town Center Complex seeking Accountants. Send resume to: P.O. Box 254, Southfield, MI. 48037.

ACCOUNTANT
Senior with 3 to 5 years public accounting experience. Top wages and benefits. Excellent opportunity. No travel. For now or after tax season. Mail resume:
SOSIN & SKLAR, P.C.
30800 Northwestern Hwy., Ste. 100
Farmington Hills, MI. 48018

ACCOUNTING CLERK
Needed to assist in preparation of various monthly financial reports. Previous bookkeeping experience necessary. Excellent benefits, Troy location. Send resumes and salary requirements to: Box N-3924, Detroit News 48231

ACCOUNTING CLERK
for medical equipment company in Troy. Experience necessary. full time position with benefits. Send resume to: Attention: S. Mathes, 1150 Maplelawn, Troy Mich 48084. E.O.E.

ACCOUNTING
CONSULTANT
Utilize your Accounting/Financial knowledge in a career w/Michigan's fastest growing placement/executive search firm. Salary/comm. Call 357-4810

ACCOUNTING/DATA
PROCESSING ENTRY OPER.

024 Employment Agencies & Job Information

The Executive Job Market

If you're interested in a new career position, you should be talking to us. We offer a unique, one-of-a-kind service for executives seeking from $30,000 to $100,000 and more. With the country's largest job market research staff, no one knows more about the local or national Job Markets than Robert Jameson Associates. Send a resume or call for a free and confidential meeting, and learn about our full capabilities.

Robert Jameson Associates

A.2 Part A/
Interim Status

Jack Schinderle <schindej@michigan.gov>

11/12/03 11:39 AM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: Re: ACTION: JP Suarez signed the attached memo re Watch List onOctober30, 2003

Here is what our system says about BASF:

"WDS says they were "No longer generating - Out of Business" as of 10/31/01 - They clean closed in 3/84 but have still not done corrective action - which is why they are still on the TSDF list. It is interesting though that they did manifest on shipment of wastes on 5/02. There has been no activity since then."

>>> <Campbell.Duncan@epamail.epa.gov> 11/12/03 10:57AM >>>

Got any MI facilities on the list

I haven't read it. I just passed it along for your preview. I thought you might tell me. Right now, I'm trying to find out if Gage paid their $10K in 1997 so I can RTC them. Its scary.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

JUN 13 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Allen C. Kinsler
Cook Industrial Coatings Incorporated
P.O. Box 38009, Fenkell Station
Detroit, Michigan 48238

RE: Interim Status Acknowledgement USEPA ID No. MID 007 138 746
FACILITY NAME: COOK INDUSTRIAL COATINGS INC

Dear Mr. Kinsler:

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

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

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

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

Sincerely,

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

Enclosure

cc: Kennard A. Kinzler

JES 6/10/82

FACILITY NAME

COOK INDUSTRIAL COATINGS INC

EPA ID NUMBER

MID0[illegible]/138746

FACILITY OPERATOR

COOK INDUSTRIAL COATINGS, INCORPORATED

FACILITY OWNER

COOK INDUSTRIAL COATINGS, INCORPORATED

FACILITY LOCATION

3301 BOURKE
DETROIT MI 48238

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S02	49102.00000	G

OK
GES
6/10/82

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G OR L
TANK	S02	G OR L
WASTE PILE	S03	Y OR C
SURFACE IMPOUNDMENT	S04	G OR L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
OTHER	T04	J,R,N,S,U,V

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

A

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

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

EPA I.D. NUMBER ➤ • MID007138746 REACKNOWLEDGEMENT

COOK INDUSTRIAL COATINGS INC
PO BOX 38009 FENKELL STATION
DETROIT MI 48238

INSTALLATION ADDRESS ➤ 3301 BOURKE STREET
DETROIT MI 48238

EPA Form 8700-12B (4-80) 10/03/81

Please print or type with ELITE type *(12 characters/inch)* [illegible]e unshaded areas only.

Form Approved OMB No. 158-S79016
GSA N[illegible]246-EPA-C[illegible]

EPA

U.S. ENVIRONMENTAL PROTECT[illegible] AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	
NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE 000337 DEC 1980
III. LOCATION OF INSTALLATION	

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

DETACH

FOR OFFICIAL USE ONLY

COMMENTS

C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F MID007138746 2 1	A	801124

I. NAME OF INSTALLATION

COOK INDUSTRIAL COATINGS INC

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3301 BOURKE AVE

CITY OR TOWN	ST.	ZIP CODE
DETROIT, MICHIGAN		48238

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 3301 BOURKE AVE

CITY OR TOWN	ST.	ZIP CODE
DETROIT, MICHIGAN		48238

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
KINZLER, ALBERT ENGINEER	313-861-1000

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 COOK INDUSTRIAL COATINGS INC

DETACH

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

F = FEDERAL
M = NON-FEDERAL

M

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

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

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

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

VIII. FIRST OR SUBSEQUENT NOTIFICATION

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

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

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

IX. DESCRIPTION OF HAZARDOUS WASTES

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

EPA Form 8700-12 (6-80)

NOV. 24th, 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY					
S				T/A	C
W	MID007138746			2	1
1	2		13	14	15

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

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

1	2	3	4	5	6
F002	F003	F005			
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

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

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

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

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

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

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

X. CERTIFICATION

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

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
[signature]	NORMAN FOSTER PRESIDENT, Nor tnu, Inc., a Michigan corporation	11/15/80

DETACH

DETACH

EPA Form 8700-12 (6-80) REVERSE

October 24, 1980

E. P. A. Region V
R.C.R.A. Activities
P.O. Box 7861
Chicago, Illinois 60608

Sirs:

Enclosed please find a subsequent notification form of hazardous waste activity. Note that we have not included the E.P.A. identification number, which we have not yet received after our original notification.

I am submitting this form to complete the information contained in Section 1X C, Commercial Chemical Product Hazardous Wastes. These are not new materials that are handled here, but they are the result of a thorough examination of our purchases here. The time element between my obtaining the forms to complete and the August 19th deadline was too short to allow this study to be completed before submission.

Sincerely,

Allen C. Kinsler
Safety Director

ACK:bd

COOK INDUSTRIAL COATINGS, INC.
P. O. BOX 38009 — DETROIT, MICHIGAN 48238
Telex 23-0589 Phone 313—861-1000

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

Form Approved OMB No. 158-S79016
GSA No. 0246-EP.

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

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

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

DETACH A

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: S F T/A C 1 — APPROVED: — DATE RECEIVED *(yr., mo., & day)*:

I. NAME OF INSTALLATION

COOK INDUSTRIAL COATING INC

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 PO BOX 38009 FENKELL STATION

CITY OR TOWN: 4 DETROIT — ST.: MI — ZIP CODE: 48238

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 3301 BOURKE

CITY OR TOWN: 6 DETROIT — ST.: MI — ZIP CODE: 48238

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 KINSLER ALLEN PROJ ENGINEER — PHONE NO. *(area code & no.)*: 313-861-1000

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 BASF AG - CURRAN PAINT CO.

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

F = FEDERAL
M = NON-FEDERAL

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

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

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

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

VIII. FIRST OR SUBSEQUENT NOTIFICATION

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

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

C. INSTALLATION'S EPA I.D. NO.: MID 007138746

IX. DESCRIPTION OF HAZARDOUS WASTES

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

OCT 24 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W													1
1	2										13	14	15

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

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

1: F003	2: F005	3:	4:	5:	6:
7:	8:	9:	10:	11:	12:

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13: K078	14: K079	15:	16:	17:	18:
19:	20:	21:	22:	23:	24:
25:	26:	27:	28:	29:	30:

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31: P100	32: U002	33: U008	34: U031	35: U057	36: U113
37: U118	38: U122	39: U140	40: U147	41: U154	42: U159
43: U161	44: U162	45: U190	46: U220	47: U239	48:

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49:	50:	51:	52:	53:	54:

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

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

X. CERTIFICATION

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

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	Allen C. Kinsler- Project Engineer	

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

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

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

added w/codes + deleted w/codes 5-6-81 S.T.

PLEASE PLACE LABEL IN THIS SPACE

000010 AUG 6 80

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

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F MID007138746 T/A 2 C 1

APPROVED: A

DATE RECEIVED (yr., mo., & day): 800806

I. NAME OF INSTALLATION

COOK INDUSTRIAL COATINGS, INC.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 PO BOX 380009 FENKELL STATION

CITY OR TOWN: 4 DETROIT ST. MI ZIP CODE 48238

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 3301 BOURKE STREET

CITY OR TOWN: 6 DETROIT ST. MI ZIP CODE 48238

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 ACKINSLER PROJECT ENGINEER

PHONE NO. *(area code & no.)*: 313-861-1000

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 COOK INDUSTRIAL COATINGS, INC.

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

F = FEDERAL
M = NON-FEDERAL

M

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

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

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

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

VIII. FIRST OR SUBSEQUENT NOTIFICATION

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

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

C. INSTALLATION'S EPA I.D. NO.: MID007138746

IX. DESCRIPTION OF HAZARDOUS WASTES

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

AUG 0 6 1980

D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	M	D	0	0	7	1	3	8	7	4	6		2	1
1	2											13	14	15

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

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

1	2	3	4	5	6
F003	F004	~~F017~~			
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K078	K079	~~K082~~			
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P100	U002	U008	U031	U057	U113
37	**38**	**39**	**40**	**41**	**42**
U118	U122	U140	U147	U154	U159
43	**44**	**45**	**46**	**47**	**48**
U161	U162	U190	U220	U239	

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

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

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

X. CERTIFICATION

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

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	ALLEN C. KINSLER PROJECT ENGENEER	8-4-80

DETACH

Kennard A. Kinzler
President
and
Chief Executive Officer

RECEIVED
DEC 10 1985
U.S. EPA, REGION V

RECEIVED
DEC 0 4
SOLID WASTE BRANCH
U.S. EPA, REGION V

November 27, 1985

EPA Region 5
230 South Dearborn Street
Chicago, Illinois 60604

RE: NOTICE OF MERGER AND NAME CHANGE
3301 Bourke Avenue
Detroit, Michigan 48238

MID007138746G, PA-3

Dear Sir:

Effective December 31, 1985 Glasurit America, Inc. will be merged into BASF Inmont Corporation and simultaneously the name of the surviving Corporation will be changed to BASF Corporation. BASF Corporation will be the owner and/or operator of the referenced facility and will be responsible for compliance with the permits issued by your agency. A specific list of affected permits and pending applications will be provided prior to December 31, 1985.

I am now an official of Glasurit America, Inc. and will be an official of BASF Corporation.

Very truly yours,

Kennard A. Kinzler

Kennard A. Kinzler
President

KAK/mjv

GLASURIT AMERICA, INC.
2600 TELEGRAPH ROAD
BLOOMFIELD HILLS, MICHIGAN 48013
(313) 645-1000

RECEIVED
MAR 14 1983
WASTE MANAGEMENT
BRANCH

Glasurit

Name Changed to Glasurit America Inc 4/7/83 MGP
again 10/6/83 MGP

March 10, 1983

Ms. Barbara Russell
U.S.E.P.A. Regeon V
Waste Management Div., 5HW-13
230 S. Dearborn
Chicago, Illinois 60604 MID007138746 PA, G, TSD, PASI

Dear Ms. Russell:

This is to confirm our name change from Cook Industrial Coatings, Inc. (MID007138746) to Glasurit America, Inc.

The change was effective September 26, 1982, and does not involve a change in the Incorporation status.

I am hopeful that this is sufficient to end the confusion about our corporate name.

Very truly yours,

Allen C. Kinsler
Project Engineer

ACK/lr

RECEIVED 3/17/83

GLASURIT AMERICA, INC.
3301 BOURKE / DETROIT, MICHIGAN 48238
(313) 861-1000

BASF MEMBER OF THE BASF GROUP

COOK

July 28, 1981

Not. ok file LM.

Ms. A. Bloom
E.P.A. Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60608

E.P.A. ID# MID007138746

Dear Ms. Bloom:

I have reviewed the application forms filed with the E.P.A. for our RCRA permit, and I am embarrassed to admit that several errors still exist--specifically:

Notifier

1. On the Notification of Hazardous Waste Activity (EPA Form 8700-12), the Description of Hazardous Waste (Section IX), Part A (Hazardous Waste from Non-Specific Sources) should read F002, F003 and F005. In this case, F002 needs to be added, F004 deleted.

Part A

2. On Part A of our TSDF application, Section VIII (Facility Owner), the name of the facility's legal owner (Item 1) should read "Cook Industrial Coatings, Inc.".

These do not represent any changes on our part in the types of solvents handled, or in the ownership. We do restrict our materials that we accept in accordance to the hazards involved so that these categories are much too broad, but this is the best way to describe our materials that we reclaim.

The incorrect information on the Notification is the result of a communications breakdown, where I attempted to add F002, while retaining the F003 and correcting the F004 to F005. Unfortunately, only the F005 was changed. I would like to point out that only methylene chloride is handled here, used for the cleaning of shipping containers.

The error of Part A, where the names of the corporate owners were incorrectly submitted, was a case of being too specific. Because Cook Industrial Coatings is incorporated as its own entity, this should be reflected on the Part A application, instead of the current corporate ownership.

Sincerely,

Allen C. Kinsler
Emergency Coordinator

ACK:ldk

SUB. NOT.

AUG 05 1981

CHANGES TO BE MADE ON NOT. & PART A

COOK INDUSTRIAL COATINGS, INC.
P. O. BOX 38009 — DETROIT, MICHIGAN 48238
Telex 23-0589 Phone 313—861-1000

AUG 5 1981

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

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

48

EPA I.D. NUMBER: F M I D 0 0 7 1 3 8 7 4 6 (T/A) 3 (C) D

LABEL ITEMS

EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

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

II. POLLUTANT CHARACTERISTICS

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

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)	16	X 17	18
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	22	X 23	24
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X 28	29	30
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	34	X 35	36
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)	40	X 41	42

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)	19	X 20	21
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)	25	X 26	27
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	31	X 32	33
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	37	X 38	39
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)	43	X 44	45

III. NAME OF FACILITY

C 1 SKIP: COOK INDUSTRIAL COATINGS, INC.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
C 2 KINSLER ALLEN C	313 861 1000

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: C 3 PO BOX 38009 FENKELL STATION

B. CITY OR TOWN	C. STATE	D. ZIP CODE
C 4 DETROIT	MI	48238

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: C 5 3301 BOURKE

B. COUNTY NAME: WAYNE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
C 6 DETROIT	MI	48238	163 ak

EPA Form 3510-1 (6-80)

NOV 16 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

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

A. FIRST		B. SECOND	
7 2851	(specify) PAINTS - VARNISHES	7 2821	(specify) PLASTIC MATERIALS
C. THIRD		**D. FOURTH**	
7	(specify)	7	(specify)

VIII. OPERATOR INFORMATION

A. NAME: 8 COOK INDUSTRIAL COATINGS, INC.

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO

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

D. PHONE (area code & no.): A 313 861 1000

E. STREET OR P.O. BOX: PO BOX 38009 FENKELL STATION

F. CITY OR TOWN	G. STATE	H. ZIP CODE
B DETROIT	MI	48238

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N	9 P
B. UIC (Underground Injection of Fluids)	**E. OTHER (specify)**
9 U	9 (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER (specify)**
9 R	9 (specify)

XI. MAP

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

F9: B/50

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURER OF PAINTS & RESINS

F9: A/51

XIII. CERTIFICATION (see instructions)

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

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
	Kenneth O. Kinzler	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

C

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

Form Approved OMB No. 158-S80004

FORM 3510-3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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

EPA I.D. NUMBER: F M I D 0 0 7 1 3 8 7 4 6 (TA 3 1)

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

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

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

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

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

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: YR. 73, MO. 09, DAY 17

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

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

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

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

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

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

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

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

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

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

C DUP TA 3 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S02	49,102 ~~000~~	G		7				
2					8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "104")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

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

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

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

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

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

D. PROCESSES

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

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

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

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

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

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

CONTINUE ON PAGE 3

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W MID 0 0 7 1 3 8 7 9 6 T/A 3 C 1	W DUP T/A 3 C 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	~~K 0 7 8~~	~~3362.5 00~~	~~T~~		TEMP. SUSPENDED
2	F 0 0 3	3362.5 00	T		
3	F 0 0 5	3362.5 00	T		
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

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

48

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

F MID007138746 3 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6: B/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6: B/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
42 23 560	083 07 593

VIII. FACILITY OWNER

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

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

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E BASF AG / CURRAN PAINT CO.	313-861-1000

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 3301 Bourke	G Detroit	MI	48238

IX. OWNER CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Kt	Kennard O. Knighton	11/17/80

X. OPERATOR CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
	Kennard O. Knighton	11/17/80

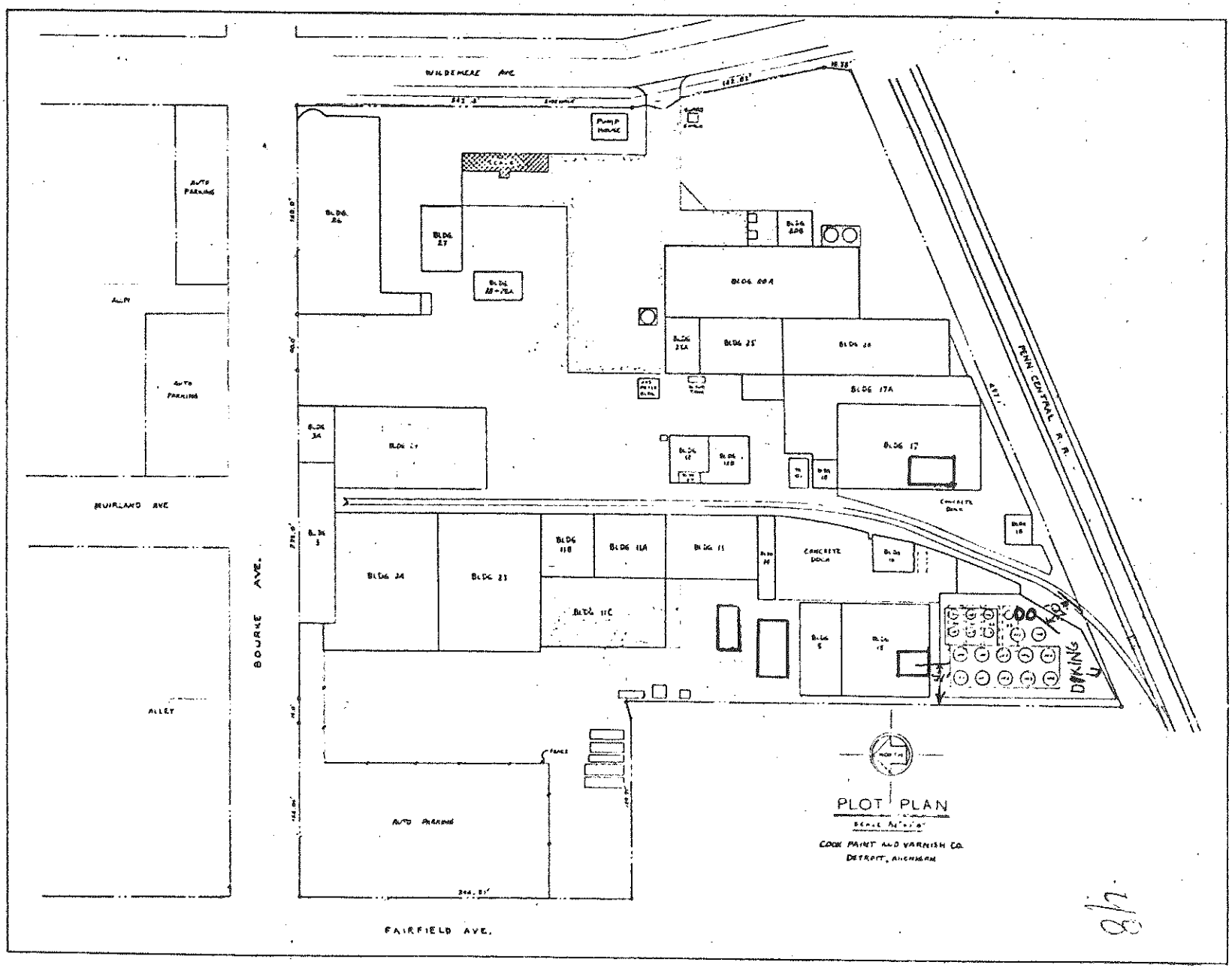
 CONTINUE ON PAGE 5

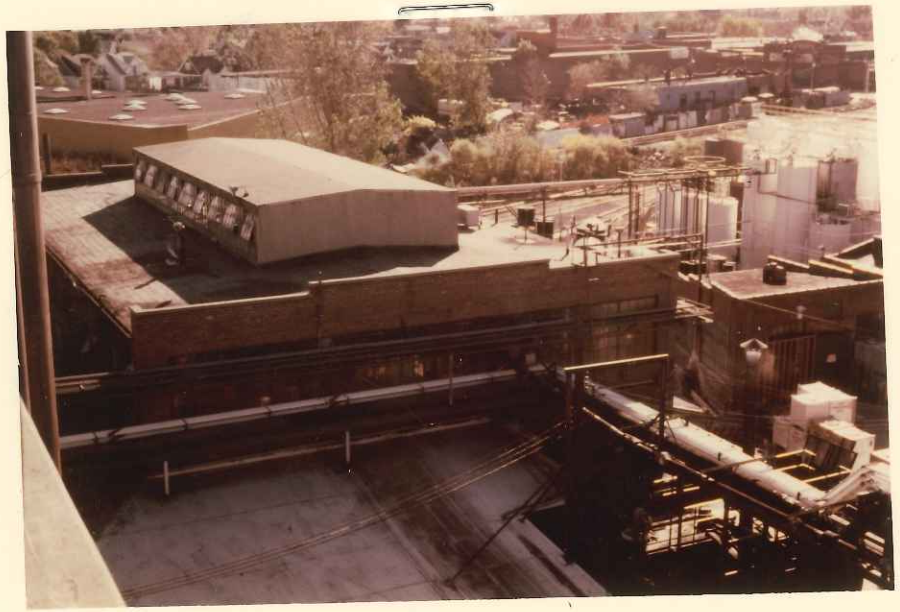
Continued from page 4.

V. FACILITY DRAWING *(see page 4)*

SEE ATTACHED

48


WILDEMERE AVE
PUMP HOUSE
AUTO PARKING
ALLEY
AUTO PARKING
MUIRLAND AVE
BOURKE AVE.
ALLEY
BLDG 26
BLDG 27
BLDG 28-28A
BLDG 28B
BLDG 28A
BLDG 25
BLDG 26
BLDG 17A
BLDG 17
BLDG 24
BLDG 23
BLDG 11B
BLDG 11A
BLDG 11
BLDG 11C
CONCRETE DOCK
BLDG 5
BLDG 18
PENN CENTRAL R.R.
DOCKING
FENCE
AUTO PARKING
FAIRFIELD AVE.
PLOT PLAN
COOK PAINT AND VARNISH CO.
DETROIT, MICHIGAN



Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F M I D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G O H D 0 8 0 9 8 3 9 3 5
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Abitibi Corp.

XII. GENERATOR ADDRESS

2900 Hill Ave.

Toledo, OHIO 43628

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvent, mixed	D001	S02	7	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Quantity based on average specific gravity of 0.85

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F M I D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G I N D 0 0 0 8 0 3 7 2 6
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

General Electric

XII. GENERATOR ADDRESS

301 N. Curry Pike
P.O. Box 42
BLoomington, INDIANA 47402

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)		C. Handling Method	D. Amount of Waste	E. Unit of Measure
29 32	1	Waste Mixed Solvents	F 0 0 3 (33 36)	D 0 0 1 (37 40)	S 0 2 (49 51)	1 4 (52 60)	T (61)
	2						
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

Tear out here

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

Quantity based on average solvent specific gravity of 0.85

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. F/A C

F M I D 0 0 7 1 3 8 7 4 6 1 (positions 1–15)

X. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 7 3 8 (positions 16–28)

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Fisher BOdy, GMC

ON-SITE ☐

XII. GENERATOR ADDRESS

4300 S. Saginaw
Flint, MI 48429

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvent, mixed	D001	S02	59	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Quanity based on average solvent specific gravity of 0.85

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. I/A C

F	M	I	D	0	0	7	1	3	8	7	4	6		1
1	2											13	14	15

X. GENERATOR'S EPA I.D. NO.

G	M	I	D	0	0	0	0	2	0	3	0
16											28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Sea Ray, Boats, Inc. ON-SITE ☐

XII. GENERATOR ADDRESS

925 N. Lapeer Rd.

Oxford, MI 48051

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29–32	1	Spent Acetone	F003 (33–36) D001 (37–40) (41–44) (45–48)	S02 (49–51)	13 (52–60)	T (61)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Quantity based on average specific gravity of 0.85

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

F M I D 0 0 7 1 3 8 7 4 6 1 (I/A C)
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G I L D 0 0 4 5 3 1 9 2 7
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Midland Div. Dexter Corp. ON-SITE ☐

XII. GENERATOR ADDRESS

1 - 7 E Water
Waukegan, ILL 60085

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29 32	1	Waste Solvents, mixed	F 0 0 3 (33 36) (37 40) (41 44) (45 48)	S 0 2 (49 51)	4 3 (52 60)	T (61)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Quantity based on average solvent specific gravity of 0.85

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. I/A C

F M I D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 7 0 4
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Cadillac Motor Car, GMC ON-SITE ☐

XII. GENERATOR ADDRESS

2860 Clark Ave

Detroit, MI 48232

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvents, mixed	F005	S02	21	T
	2	Waste Solvents, mixed	F001	S02	13	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Tear out here

Do not make entries in shaded area

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. I/A C

F M I D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M I T 2 7 0 0 1 0 0 4 4
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Buick Motor Div. GMC ON-SITE ☐

XII. GENERATOR ADDRESS

902 E. Hamilton
Flint, MI 48550

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM
S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29 32	1	Waste 1, 1, 1, Tricklord Ethane	F 0 0 2 (33 36 37 40 / 41 44 45 48)	S 0 2 (49 51)	2 9 (52 60)	T (61)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. F/A C

F M I D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G I N D 0 0 5 4 4 9 5 2 5
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

American Can Co. ON-SITE ☐

XII. GENERATOR ADDRESS

2501 165th Street

Hammond, Indiana 46320

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvents, mixed	D001	S02	2016	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. (F/A C)

F M I D 0 0 7 1 3 8 7 4 6 1

X. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 8 8 2 5

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Ford Motor Co.

ON-SITE ☐

XII. GENERATOR ADDRESS

400 Groesbeck Hwy.

Mt. Clemens, MI 48403

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)		C. Handling Method	D. Amount of Waste	E. Unit of Measure
	1	Mixed Waste Solvent	F 0 0 3	F 0 0 5		1 8 7	T
	2						
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

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

Tear out here

Do not make entries in shaded ar

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 8 0 3

16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Detroit Diesel Allison ON-SITE ☐

XII. GENERATOR ADDRESS

13400 W. Outer Drive

Detroit, MI 48239

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvent, mixed	U220 D001		22	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Tear out here

Do not make entries in shaded ai

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

FMID007138746 (T/A C: 1)

X. GENERATOR'S EPA I.D. NO.

GMID053324463

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Diversified Glass Products ON-SITE ☐

XII. GENERATOR ADDRESS

2475 Brown Rd.

Pontiac, MI 48055

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
	1	Waste Acetone	U002 D001	S02	30	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Quantity based on average solvent specific gravity of 0.85

Tear out here

Do not make entries in shaded areas

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Explain your non-regulated status in the space below.

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

T/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

This Facility's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other (explain in comment section)

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

G L A S U R I T A M E R I C A , I N C .

30 69

IV. FACILITY MAILING ADDRESS

3 P O B O X 3 8 0 0 9 F E N K E L L S T A T I O N

15 16 45

Street or P.O. Box

4 D E T R O I T M I 4 8 2 3 8

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

5 3 3 0 1 B O U R K E

15 16 45

Street or Route number

6 D E T R O I T M I 4 8 2 3 8

15 16 41 42 47 51

City or Town State Zip Code

VI. FACILITY CONTACT

2 A L L E N C . K I N S L E R

15 16 45

Name (last and first)

3 1 3 – 8 6 1 – 1 0 0 0

46 55

Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

$ 3 3 0 0 0 $

16 19 22 25 28 31

A. Cost Estimate for Facility Closure

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. 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.

ALLEN C. KINSLER PROJ. ENG. 2/1/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13B(5-80) (Revised 11-83)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. (T/A C)

F M I D 0 0 7 1 3 8 7 4 6 1 (positions 1–13, 14, 15)

X. GENERATOR'S EPA I.D. NO.

G I N D 0 0 6 0 5 0 9 6 7 (positions 16–28)

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Eli Lilley & Co.

XII. GENERATOR ADDRESS

1200 Kentucky Ave.
Indianapolis, Indiana 46285

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 [ ] AMOUNT OF WASTE [ ] UOM
S02 [1 2 3] AMOUNT OF WASTE [T] UOM
S03 [ ] AMOUNT OF WASTE [ ] UOM
S04 [ ] AMOUNT OF WASTE [ ] UOM
S05 [ ] AMOUNT OF WASTE [ ] UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvent (mixed)	F003	S02	25	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Based on average solvent specific gravity of 0.85

Do not make entries in shaded are

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G I N D 0 0 0 8 0 6 9 3 5

16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Eli Lilley and Co.

XII. GENERATOR ADDRESS

1555 Kentucky Ave.
Indianpolis, Indiana 46285

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvents (mixed)	F003	S02	238	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Based on average solvent specific gravity of 0.85

Do not make entries in shaded are

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G I N D 0 0 6 0 4 8 4 1 7

16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Eli Lilley and Co.

ON-SITE ☐

XII. GENERATOR ADDRESS

1200 Kentucky Ave.
Indianapolis, INDIANA

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvents (mixed)	F003	S02	674	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

F/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M I D 0 0 1 8 6 8 5 3 8

16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Inmont Corp.

XII. GENERATOR ADDRESS

5935 Milford Ave.

Detroit, MI 48210

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvent (mixed)	F003	S02	449	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Based on average solvent specific gravity of 0.85

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F M I D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G I L D 0 6 8 4 5 8 8 3 5
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

G.D. SEARLE+CO. ON-SITE ☐

XII. GENERATOR ADDRESS

4901 Searle Parkway
Skokie, Illinois 60077

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Acetone	F003	S02	12	T
	2	Waste Tetra Hydrofuran	U213	S02	27	T
	3	Waste Ethyl Acetate	U112	S02	4	T
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F M I D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M I D 0 7 2 5 7 5 7 3 1
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Burdick & Jackson Labs. Inc.

XII. GENERATOR ADDRESS

1935 S. Harvey St.

Muskegon, MI 49442

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Methylene Chloride	F001	S02	14	T
	2	Waste Tetrahydrofuran	U213	S02	9	T
	3	Waste Solvents	F003 F005	S02	61	J
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Union Carbide

XII. GENERATOR ADDRESS

P. O. Box 180

Sisterville, WV 26175

IX. FACILITY'S EPA I.D. NO.

F M T D 0 0 7 1 3 8 7 4 6 1 (1 2 13 14 15)

X. GENERATOR'S EPA I.D. NO.

G W V D 0 0 4 3 2 5 3 5 3 (16 28)

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29 32	1	Waste Tolvene/methanol Md.	F 0 0 5 (33 36 37 40 / 41 44 45 48)	S 0 2 (49 51)	5 0 1 (52 60)	T (61)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F M I D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G N J D 0 0 2 4 4 4 7 1 9
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Union Carbide Corp.

XII. GENERATOR ADDRESS

Box 670 River Rd.

BOund Brook, N.J.

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)		C. Handling Method	D. Amount of Waste	E. Unit of Measure
29 32	1	Waste Solvents, mixed	F003 D001 (33 36 / 41 44)	F005 (37 40 / 45 48)	49 51	29 (52 60)	T (61)
	2						
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

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

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

F/A C

F M T D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M T D 0 4 9 2 6 2 7 0 2
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Dow Corning Corp.

XII. GENERATOR ADDRESS

1635 N. Gleaner Rd.

Hemlock, MI 48601

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29–32	1	Waste Solvent, mixed	F002 F003 D001 (33–36, 37–40, 41–44, 45–48)	S02 (49–51)	29 (52–60)	T (61)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Dow Corning Corp.

XII. GENERATOR ADDRESS

3901 S. Saginaw Rd.

Midland, MI 48640

IX. FACILITY'S EPA I.D. NO.

T/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M I D 0 0 0 8 0 9 6 3 2

16 28

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Methanol/ Ethylene Diamine	F005 D001	S02	24	T
	2	Waste Hexane	D001	S02	45	T
	3	Waste Tolvene/Xylene	F003 F005	S02	623	T
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

F/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M N T 2 8 0 0 1 1 1 7 2

16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Sweet Oil Co.

XII. GENERATOR ADDRESS

507 Sherman St.

N. Mankato, MN 56001

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvent, mixed	F003	S02	21	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Quantity based on average solvent specific gravity OFO.85

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F M I D 0 0 7 1 3 8 7 4 6 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M I D o o 6 3 5 6 6 4 7
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

AC Spark Plug ON-SITE ☐

XII. GENERATOR ADDRESS

2926 Davison Rd.
Flint, MI 48556

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–40, 41–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Stoddard Solvent	D001	S02	6	T
	2	Waste Trichlordethane	F001	S02	12	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

O H D 0 0 5 0 4 4 2 1 9

16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Manufacturer's Enamelling Corporation

XII. GENERATOR ADDRESS

400 S. Westwood

Toledo, OHIO 43609

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36, 37–40, 41–44, 45–48)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvent, mixed	F 0 0 5	S 0 2	4	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

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

Quantity based on average solvent specific gravity of 0.85

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

F/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G O H D 0 4 2 1 5 8 6 9 2

16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

Permag Magnetic Corp.

XII. GENERATOR ADDRESS

2960 South Ave.

Toledo, OH 43609

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions) (33–36)	(37–40)	C. Handling Method (49–51)	D. Amount of Waste (52–60)	E. Unit of Measure (61)
	1	Waste Solvent, mixed	D001		S02	1	T
	2						
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

Tear out here

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

Quantity based on average specific gravity 0.85

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T/A C

F M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

g. TSD ✓

III. NAME OF INSTALLATION

GLASURIT AMERICA, INC.

30 69

IV. INSTALLATION MAILING ADDRESS

3 PO BOX 38009 FENKELL STATION

15 16 45

Street or P.O. Box

4 DETROIT MI 48238

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5 3301 BOURKE

15 16 45

Street or Route number

6 DETROIT MI 48238

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

2 ALLEN C. KINSLER

15 16 45

Name (last and first)

313-861-1000

46 55

Phone No. (area code & no.)

VII. 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.

ALLEN C. KINSLER	PROJ. ENG.	[signature]	2/2/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

Tear out here

EPA Form 8700-13A(5-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Tricil (Sarnia) Ltd.

X. FACILITY'S EPA I.D. NO.

F M I T 2 7 0 0 1 9 9 0 4

16 28

XI. FACILITY ADDRESS

RR #1
Corruna, Ontario Non-160

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental Services MID 0274 78574

XIII. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. DOT Hazard code (33–34)	C. EPA Hazardous Waste No. (see instructions) (35–38)	(39–42)	D. Amount of Waste (51–59)	E. Unit of Measure (60)
	1	Waste Paint	07	D001		13	T
	2						
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M T D 0 0 7 1 3 8 7 4 6 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Solvent Resource Recovery

X. FACILITY'S EPA I.D. NO.

F O H D 0 9 3 9 4 5 2 9 3

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

Chemical Waste Management - SPringfield OHD 000724161

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Still Bottoms	017	F003 F005 D001	24	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 7 1 3 8 7 4 6 1 (T/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Ross Incineration Services

XI. FACILITY ADDRESS

394 Giles Rd.
Grafton, OHIO 44044-9752

X. FACILITY'S EPA I.D. NO.

F O H D 0 4 8 4 1 5 6 6 5

XII. TRANSPORTATION SERVICES USED

Ross Transportation Services OHD 980614374

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Still Bottoms		F003 D001	111	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 7 1 3 8 7 4 6 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SCA Chemical Services

X. FACILITY'S EPA I.D. NO.

F I L D 0 0 0 1 7 3 0 5 4

XI. FACILITY ADDRESS

11700 S. Stony Island Road
Chicago, ILL 60617

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental Services MID 027478574

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste Flammable Solids	0	D001	16	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 7 1 3 8 7 4 6 [ ] 1 (T/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met Services, Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 Allen Rd.
Wyandotte, MI 48192

XII. TRANSPORTATION SERVICES USED

Chem-Met Service, Inc. MID 096963194

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste Resin Filtrate	07	D001	45	T
	2	Tank Cleaning Wastes	07	D001	11	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE[illegible]

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

LWD, Inc.

X. FACILITY'S EPA I.D. NO.

F K Y D 0 8 8 4 3 8 8 1 7

16 28

XI. FACILITY ADDRESS

Hwy. 1523, Box 327
Calvert City, Kentucky 42029

XII. TRANSPORTATION SERVICES USED

Mr. Frank, Inc. ILD 069506160

XIII. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. DOT Hazard code (33–34)	C. EPA Hazardous Waste No. (see instructions) (35–38, 39–42, 43–46, 47–50)	D. Amount of Waste (51–59)	E. Unit of Measure (60)
	1	Waste Paint		D 0 1	2 1 2	T
	2	Still Bottoms		D 0 0 1 F 0 0 5 F 0 0 3	7 8	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE[illegible]7

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chemical Waste Mgmt. - Emelle

X. FACILITY'S EPA I.D. NO.

F A L D 0 0 0 6 2 2 4 6 4

16 28

XI. FACILITY ADDRESS

State Highway 17
Mile Marker 163
Emelle, Alabama 35459

XII. TRANSPORTATION SERVICES USED

Chemical Waste Management - SPringfield OHD000724161

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
29 32	1	Used Filter Media	07 (33 34)	D001 (35 38)	(39 42)	281 (51 59)	T (60)
	2	Used Spill Absorbent	07	D001		74	T
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGEN

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

X. FACILITY'S EPA I.D. NO.

F M I D 9 8 0 6 1 5 2 9 8

16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro Chem Processing

XI. FACILITY ADDRESS

421 Lycaste
Detroit, MI 48214

XII. TRANSPORTATION SERVICES USED

Inland Waters Pollutions Control MID 000820365
(Subsequent) Solvent Distillers, Inc. MID 980684088

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
29 32	1	Waste Paint	0 7 (33 34)	D 0 0 1 (35 38)	(39 42)	5 5 3 (51 59)	T (60)
	2						
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGEN

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I D 0 0 7 1 3 8 7 4 6 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro-Chem Processing

X. FACILITY'S EPA I.D. NO.

F M I D 9 8 0 6 1 5 2 9 8

16 28

XI. FACILITY ADDRESS

421 Lycaste
Detroit, MI 48214

XII. TRANSPORTATION SERVICES USED

Drury Brothers MID 056988892

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
29–32	1	Spent Solvents to be Recycled	07 (33–34)	F003 (35–38)	D001 (39–42)	81 (51–59)	T (60)
	2	Waste Paint	07	D001		53	T
	3	Still Bottoms	07	F003 F005	D001	1893	T
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

A.4 Closure/Post-Closure

Jack Schinderle <schindej@michigan.gov>

11/10/03 07:37 AM

To: Duncan Campbell/R5/USEPA/US@EPA
cc:
Subject: Fwd: Re: (296154921) Duns Form

Duncan,

Here is the info I got back on your request.

Anything exciting going on at EPA that I might be interested in?

Jack

----- Message from "Stephen Buda" <BUDAS@michigan.gov> on Mon, 10 Nov 2003 08:34:51 -0500 -----

To: "Jack Schinderle" <SCHINDEJ@michigan.gov>

Subject Fwd: Re: (296154921) Duns Form

:

Jack: See attached screens from the TSD database.

The facility is an interim status TSD (storage) facility ,
clean closed in 1984,
a low priority NCAPS faciity for corrective action,
with an RFA completed in 01/15/1992 by EPA.

I don't have any personal knowledge beyound what I have gleaned from the TSD database.

Steve.

Steve Buda, P.E., Chief
Hazardous Waste Management Unit
Waste and Hazardous Materials Division
Michigan Department of Environmental Quality

Phone: 517 373-7924
Fax: 517 373-4797
Email: BUDAS@STATE.MI.US

Waste and Hazardous Materials Division
Michigan Department of Environmental Quality
P.O. Box 30241
Lansing, MI 48909-7760

For Overnight Mail:
Constitution Hall, Atrium North
525 West Allegan Street
Lansing, MI 48933

>>> Jack Schinderle 10/31/03 10:47 >>>
Steve,

What can you tell Duncan about this facility? I looked in WDS but cannot find out much.

Jack

5HW-13

JUN 19 1984

Mr. Allen C. Kinsler
Glasurit America, Inc.
3301 Bourke
P.O. Box 38009 Fenkell Station
Detroit, Michigan 48238

Re: Hazardous Waste Facility Closure
MID 007 138 746

Dear Mr. Kinsler:

This is to acknowledge receipt of the certification of closure of your hazardous waste storage facility. We understand that you will continue to operate only as a generator of hazardous waste under the Resource Conservation and Recovery Act.

Since closure activities are now complete, this Agency consents to the termination of the July 15, 1982, letter of credit, which is being returned herewith. The letter of credit was provided under 40 CFR 265.143 to ensure that funds would be available to cover closure costs should the facility cease operation. No further financial assurance for closure will be required. Also, enclosed are certificates of liability insurance coverage, which, likewise, are no longer required.

If you have any questions on this matter, please contact George Hamper of my staff at (312) 886-3719.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosures

cc: Alan J. Howard (MDNR)

bcc: T. Golz TB 06-12-84

5HW-13:GHAMPER:ap:6-3719:6/11/84

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIR.
INITIALS	ap	GH			WEM	WEM		
DATE	6-11-84	6-11-84			6/12/84	6/12/84	6/12/84	6/18/84

May 30, 1984

Mr. George Hamper
U.S. Environmental
Protection Agency
Region V 5HW-13
230 S. Dearborn St.
Chicago, ILL 60604

Dear Mr. Hamper:

RE: Closure MID 007138746 G, TSD, PA

This is to certify the closure of the storage facility on our premises, EPA I.D. No. MID 007138746.

In accordance with our closure plan, we:

1. Stopped accepting wastes as of February 1, 1984 for this activity.

2. Removed from the tanks all sludges, liquids, and solids which were put into drums and disposed of at an approved site, and

3. Triple-rinsed with a caustic solution heated to the boiling point these tanks to remove any residue of hazardous waste.

I hereby certify, by knowledge of the actual rinsing, by visual inspection, and by testing with a GasTech gas monitor, that all wastes and their residues have been removed from the tanks.

Attached is a certification by a reputed area engineering testing firm.

We will continue to generate wastes on site as a manufacturing facility as I have mentioned before.

RECEIVED
JUN 06 1984
WMD-RAIU
EPA, REGION V

Sincerely,

GLASURIT AMERICA, INC.

RECEIVED
JUN 05 1984
WASTE MANAGEMENT BRANCH

Allen C. Kinsler
Project Engineer
Representative of the Owner/Operator

ACK/rmk
Enclosure

GLASURIT AMERICA, INC.
3301 BOURKE / DETROIT, MICHIGAN 48238
(313) 861-1000

5HW-13

MAY 25 1984

Allen C. Kinsler
Glasurit America, Inc.
3301 Bourke
Detroit, Michigan 48238

Re: Closure
MID 007138746

Dear Mr. Kinsler:

We have completed our review of the partial closure plan you submitted on January 6, 1984, covering closure of ten hazardous waste storage tanks. A thirty-day public comment period on the plan ended on May 9, 1984, and no comments were received.

The closure plan is hereby approved. Please submit the certification of closure required under 40 CFR 265.115 as soon as these units have been closed in accordance with the approved closure plan.

Please contact George Hamper of my staff at (312) 886-3719, if you have any questions.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Alan J. Howard (MDNR)

5HW-13:GHAMPER:mh:6-3719:5/22/84

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	MH	[illegible]			WEY	[illegible]	KJK	DS
DATE	5/22/84	5/22/84			5/22/84	5/23/84	5/23/84	5/24/84

FILE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: May 17, 1984

SUBJECT: Close of the Public Comment Period
Glasurit America, Incorporated
MID 007 138 746

FROM: Diane M. Sharrow, EPA-RAIU

TO: George Hamper, PW-TPCS

The public comment period for Glasurit America, Incorporated, closed May 09, 1984. I have waited until today to notify you of the receipt of any comments, due to the requirement that we must allow five working days for mailed comments to reach this Agency. However, these comments must be postmarked before, or on the last day of the public comment period. For your records and the facility file, there were no comments received on the Glasurit America, Incorporated's Change Of Status/Closure, during the designated public comment period.

Glasurit

January 6, 1984

Regional Administrator
EPA Region V
230 S. Dearborn St.
Chicago, ILL 60604

MID 007 138 746 G, TSD, PA

Dear Sir:

This is to notify you of the intended closure of our hazardous waste facility, EPA ID number MID007138746. The closure plan is attached.

This closure must be completed in an expedited fashion due to a legal settlement between Glasurit and Nortru, Inc., the owner of the solvent distillation equipment used for processing the wastes.

We will accept the last solvents prior to February 1,1984, and the equipment will be removed by March 1.

The storage tanks which are the items that required the permit, will be kept here, on site. We will be cleaning the tanks according to the plan, beginning in March. The tanks will then be sand-blasted and lined, beginning in May.

These tanks will be put to use in a process to manufacture paint, our primary business, and will not be used to contain any waste material. We will continue to generate hazardous wastes to be disposed of off site.

The closure plan is attached.

Sincerely,

Allen C. Kinsler

Allen C. Kinsler

ACK/rmk

Enclosure

RECEIVED 1-16-84

RECEIVED JAN 18 1984 WASTE MANAGEMENT BRANCH

GLASURIT AMERICA, INC.
3301 BOURKE / DETROIT, MICHIGAN 48238
(313) 861-1000

BASF MEMBER OF THE BASF GROUP

CLOSURE PLAN

Comment: Subpart G, Sections 264 and 265 (Interim Status new facility) regulations require that facilities that Treat, Store or Dispose of hazardous waste have a written plan for the closure of the facilities. This closure must be designed and carried out to minimize exposure and threats to human health and the environment. Our operations in this area require us to look at two alternatives: 1, closure of the hazardous waste processing operation with continuing operation in the rest of the facility; and, 2, complete shutdown of all operations on site.

1. Closure of Reclamation Operation Only

   A. The tanks will be drained of all contents, with liquids going to be incinerated.

   B. Hatches on tanks will be removed, and settled solids will be removed using vacuum truck hose suction.

   C. Tanks will be triple rinsed, using water, a drum (50 gallons) of caustic soda, and live steam injection.

   D. Cleaning efficiency will be verified using appropriate hydrocarbon vapor monitor, following a periof of 24 hours with the tanks completely sealed.

2. Closure of Total Complex

   A. Liquids will be removed by vacuum trucks. Solids settled on bottom of tank will be washed out using recirculating solvent spray system.

   B. Tanks will be flushed using water blaster and caustic water solution. Three changes of solution will be required.

   C. Cleaning efficiency will be monitored and verified using appropriate hydrocarbon vapor monitor, allowing the tank to be sealed for 24 hours before check.

CALCULATION OF CLOSURE COSTS

Costs from current quotes, Tricil, Ltd; Marine Pollution Control Co.; and Chemical Waste Management

DISPOSAL 2 x 4,900 Gallon Still Bottom Tanks
8 x 4,900 Gallon Dirty Solvent Tanks
TOTAL 49,000 Gallons Hazardous Waste

DISPOSAL @ 24¢/Gallon (Tricil, Inc., Sarnia, Ont.)

TOTAL COST $11,760.00

VACUUM TRUCK RENTAL

10 Days (1 Tank/Day) @ $46.75/Hour
10 Day x 8 Hrs/Day x $46.75/Hr. $ 3,740.00

TRACTOR -$30/Hour +$0.50/Mile (75 Miles)
10 Day x8 Hours/Day $30.00/Hr + $0.50/Mile x75 Miles x 20 Trips $ 3,150.00

CLEANING

MATERIALS
30 Drums Caustic Soda @ $0.265/# $ 3,180.00

STEAM (Nominal 1# Steam/Gallon H_2O) (@) 11¢/# $ 5,445.00

LABOR 2 Men x 10 Days x 8 Hours/Day x $12.55/Hour $ 2,008.00

TOTAL COST $29,283.00

CASE II

DISPOSAL (as above) $11,760.00
VACUUM TRUCK RENTAL (as above) $ 3,740.00
TRACTOR (as above) $ 3,150.00

CLEANING

RENTAL of Water Blaster - 2 Tanks/Day, $175/Day
10 Tanks ÷ 2 Tanks/Day x $175/Day $ 875.00

RENTAL of Steam Jenny - 1 Tank/Day, $15/Hour
10 Tanks ÷ 1 Tank/Day x 8 Hours/Day x $15.00/Hour $ 1,200.00

CHEMICALS (as above) $ 3,180.00

STEAM - Using 1,000 Gallons Water/Tank
10 Tanks x 1,000 Gal. H_2O x/# Steam/Gal. H_2O x 11¢/# Steam $ 1,100.00

LABOR - 1 Cleaner ($18.65/Hour), 1 Equipment Operator ($21.60/Hr), 1 Foreman ($24.40/Hr)

10 Tanks x 8 Hours/Tank x ($18.65/Hour + $21.60/Hour + $24.40/Hour) $ 5,172.00

DISPOSAL of Water Wastes - 12¢/Gallon 10 Tanks x 1,500 Gal/Tank x $0.12/Gal	$ 1,800.00
TRANSPORTATION at $400/Trip (3,000 Gallon/Load) 10 Tanks x 1,500 Gal/Tank ÷ 3,000 Gal/Load x $200/Load	$ 1,000.00
TOTAL	$32,977.00

CURRENT CLOSURE BOND $33,000.00.

ACK/lw

NOTICE OF CANCELLATION

Hazardous Waste Liability Certificate of Liability Insurance

filed with

Name ENVIRONMENTAL PROTECTION AGENCY

Address ATTENTION MR THOMAS GOLZ
WASTE MANAGEMENT BRANCH
230 SOUTH DEARBORN STREET
CHICAGO IL 60604

This is to advise that policy # TR-SLC-185T975-5-83

(Named Insured) GLASURIT AMERICA INC

(Mailing Address) 3301 BOURKE AVE
DETROIT MI 48238

(Facility Name) GLASURIT AMERICA INC

(Facility Address) 3301 BOURKE AVE
DETROIT MI 48238

EPA I.D.# MID 007138746

by THE TRAVELERS INDEMNITY COMPANY

(Name of Company)

One Tower Square
Hartford, Connecticut 06115

said policy no longer covers the Liability Insurance requirements for a Hazardous Waste Facility Certificate effective as of the 13TH day of MARCH, 19 85 12:01 a.m. standard time at the address of the named insured as stated in said policy, provided said date is not loss than 60 (SIXTY) days after the receipt of this notice by the Regional Administrator.

KCM-095
01-07-85

John R. Kenney, Secretary (DP)

John R. Kenney
Secretary, Authorized
Representative of The Travelers
Insurance Companies
One Tower Square
Hartford, Connecticut 06115

Glasurit

April 11, 1983

RCRA Activities
U.S.E.P.A. - Region V
230 S. Dearborn St.
Chicago, Illinois 60604

MID007138746 PA, G, TSD, PAS 1

Dear Sir or Madam:

Enclosed is our copy of the letter of credit we use to assure closure of our facility (MID 007138746). I sent the copies of our insurance certificates at the beginning of March, stating at that time that I would forward a copy of this document when received.

Sincerely,

Allen C. Kinsler
Project Engineer

ACK/lr
Encl.

RECEIVED

WASTE MANAGEMENT BRANCH

RECEIVED

GLASURIT AMERICA, INC.
3301 BOURKE / DETROIT, MICHIGAN 48238
(313) 861-1000

BASF MEMBER OF THE BASF GROUP

This Credit is subject to the "Uniform Customs and Practice for Documentary Credits (1974 Revision), International Chamber of Commerce, Publication No. 290.

National Bank of Detroit
INTERNATIONAL DIVISION—LETTER OF CREDIT DEPARTMENT
P.O. BOX 116A
DETROIT, MICHIGAN 48232
CABLES—NATIONBANK DET TELEX #230164

April 7, 1983

Beneficiary:
Regional Administrator
Region V
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Re: Our Letter of Credit No. 45860
Dated: July 15, 1982

Dear Sir or Madam,

We hereby amend our above mentioned Credit Issued in your favor, for account of Glasurit America, Inc., 3301 Bourke Avenue, Detroit, Michigan 48238 as follows:

CREDIT AMOUNT IS INCREASED BY $2,000.00 (TWO THOUSAND AND 00/100 U.S. DOLLARS)***** TO A NEW TOTAL OF $33,000.00

ACCOUNTEE'S NAME NOW TO READ: GLASURIT AMERICA, INC.

EXPIRATION DATE IS EXTENDED TO JULY 15, 1984

All other terms and conditions remain unchanged.

Very truly yours,

Authorized Signature

Authorized Signature

NON-NEGOTIABLE COPY

MID 007138746

Glasurit

March 8, 1983

R.C.R.A. Activities
Region V
P.O. Box A3587
Chicago, Ill. 60690

Dear Sir:

Enclosed please find copies of our insurance certificates and a letter renewing our irrevocable letter of credit. These are, I hope, sufficient to demonstrate our financial responsibility.

Sincerely,

Allen C. Kinsler
Project Engineer

ACK/lr
Encls.

RECEIVED
MAR 11 1983
WASTE MANAGEMENT BRANCH
EPA REGION V

GLASURIT AMERICA, INC.
3301 BOURKE / DETROIT, MICHIGAN 48238
(313) 861-1000

BASF MEMBER OF THE BASF GROUP

March 7, 1983

Mr. Gerhard W. Heinen
Asst. Vice President
United States Division
National Bank of Detroit
611 Woodward
Detroit, Michigan 48232

RE: IRREVOCABLE STANDBY LETTER OF CREDIT #45860

Dear Mr. Heinen:

As discussed during your recent telephone conversation with our Mr. R. O. Thompson, please renew our Standby Letter of Credit #45860 for an additional year. Our current letter of credit expires July 15, 1983.

Also, the amount of the letter of credit should be increased from $31,000.00 to $33,000.00.

Thank you for your cooperation.

Sincerely,

G. Kinast
Vice President & Treasurer

GK/ms

3301 BOURKE / DETROIT, MICHIGAN 48238
(313) 861-1000

BASF MEMBER OF THE BASF GROUP

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. International Insurance Company, the Insurer,

of Kansas City, Missouri

hereby certifies that it has issued liability insurance covering bodily injury and property damage to Glasurit America Inc., the Insured, of 3301 Bourke Avenue, Detroit, Michigan 48238

in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 of 265.147. The coverage applies at USEPA ID NO. MID 007 138 746, Glasurit America, Inc. 3301 Bourke Avenue, Detroit, Michigan 48238 for sudden accidental occurrences. The limits of liability are $500,000 each occurrence and $1,500,000 annual aggregate excess of $500,000 each occurrence and $ 500,000 annual aggregate exclusive of legal defense costs. The coverage is provided under policy number 523229772, issued on January 13, 1983. The effective date of said policy is January 1, 1983.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (i) or 40 CFR 265.147 (j).

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. International Insurance Company, the Insurer,

of Kansas City, Missouri

hereby certifies that it has issued liability insurance covering bodily injury and property damage to Glasurit America Inc., the Insured, of 3301 Bourke Avenue, Detroit, Michigan 48238

in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 of 265.147. The coverage applies at USEPA ID NO. MID 007 138 746, Glasurit America, Inc. 3301 Bourke Avenue, Detroit, Michigan 48238 for sudden accidental occurrences. The limits of liability are $500,000 each occurrence and $1,500,000 annual aggregate excess of $500,000 each occurrence and $ 500,000 annual aggregate exclusive of legal defense costs. The coverage is provided under policy number 523229772, issued on January 13, 1983. The effective date of said policy is January 1, 1983.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (i) or 40 CFR 265.147 (j).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Marion K. Smith
(Signature of Authorized Representative of Insurer)

Marion K. Smith, Assistant Vice President
(Type Name) (Title)

Authorized Representative of International Insurance Company
(Name of Insurer)

Kansas City, Missouri
(Address of Representative)

THE TRAVELERS

Casualty-Property
Commercial Lines Department

Notice to Policyholder:

HAZARDOUS WASTE FACILITY CERTIFICATE

OF

LIABILITY INSURANCE

We have forwarded an original Certificate to the appropriate Authority for you. A copy is attached for your files. Please contact us or your agent if you have any questions concerning this Certificate.

Attachment

2/8/83

HAZARDOUS WASTE FACILITY CERTIFICATE
of
LIABILITY INSURANCE

X Travelers Indemnity Company
__ Travelers Indemnity Company of America
__ The Phoenix Insurance Company
__ Travelers Indemnity Company of Rhode Island
__ Travelers Indemnity Company of Illinois
__ Charter Oak Fire Insurance Company

One Tower Square
Hartford, Connecticut 06115

hereby certifies that it has issued liability insurance covering bodily injury and property damage to

Name: GLASURIT AMERICA INC

Mailing Address: 3301 BOURKE AVE
DETROIT MI 48238

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

E.P.A. I.D. NUMBER	NAME	ADDRESS
1. MID 007130746	GLASURIT AMERICA INC	3301 BOURKE AVE DETROIT MI 48238
2.		

for:

X sudden accidental occurrences
__ non-sudden accidental occurrences
__ sudden and non-sudden accidental occurrences

The limits of liability are $ 500,000 each occurrence
$ 500,000 annual aggregate

exclusive of legal defense costs. The coverage is provided under

Policy Number: TR-SLG-185T795-5-83

Issued on: 12-27-82

The effective date of said policy is 01-01-83

(CONTINUED ON REVERSE)

KCM-095
01-25-83

CP - 2852

The Insurer further certifies the following with respect to the insurance described on Page 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice any only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

John R. Kenney Sec (AB)

John R. Kenney
Secretary, Authorized Representative of the Travelers Insurance Companies
One Tower Square, Hartford, Connecticut 06115

HAZARDOUS WASTE FACILITY CERTIFICATE
of
LIABILITY INSURANCE

MID 007 138 746

X Travelers Indemnity Company
__ Travelers Indemnity Company of America
__ The Phoenix Insurance Company
__ Travelers Indemnity Company of Rhode Island
__ Travelers Indemnity Company of Illinois
__ Charter Oak Fire Insurance Company

One Tower Square
Hartford, Connecticut 06115

hereby certifies that it has issued liability insurance covering bodily injury and property damage to

Name: GLASURIT AMERICA INC

Mailing Address: 3301 BOURKE AVE
DETROIT MI 48238

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

E.P.A. I.D. NUMBER	NAME	ADDRESS
1. MID 007138746	GLASURIT AMERICA INC	3301 BOURKE AVE DETROIT MI 48238
2.		

for:

X sudden accidental occurrences
__ non-sudden accidental occurrences
__ sudden and non-sudden accidental occurrences

The limits of liability are $ 500,000 each occurrence
$ 500,000 annual aggregate

exclusive of legal defense costs. The coverage is provided under

Policy Number: TR-SLG-185T795-5-83

Issued on: 12-27-82

The effective date of said policy is 01-01-83

(CONTINUED ON REVERSE)

KCM-095
01-25-83

RECEIVED
JAN 28 1983
WASTE MANAGEMENT BRANCH

CP - 2852

The Insurer further certifies the following with respect to the insurance described on Page 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice any only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

John R. Kenney Sec. A.B.

John R. Kenney
Secretary, Authorized Representative of the Travelers Insurance Companies
One Tower Square, Hartford, Connecticut 06115

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Continental Casualty Company, the Insurer,

of CNA Plaza, Chicago, Illinois 60685

hereby certifies that it has issued liability insurance covering bodily injury and property damage to Cook Industrial Coatings, Inc., the Insured, of 3301 Bourke Avenue, Detroit, Michigan 48238

in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 of 265.147. The coverage applies at USEPA ID No. MID 007 138 746, Cook Industrial Coatings, Inc., 3301 Bourke Avenue, Detroit, Michigan 48238 for sudden accidental occurrences. The limits of liability are $ 500,000 each occurrence and $ 500,000 annual aggregate exclusive of legal defense costs. The coverage is provided under policy number CCP 005 31 00 05, issued on December 10, 1979. The effective date of said policy is December 1, 1979.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (i) or 40 CFR 265.147 (j).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Joe W. Hellstern
(Signature of Authorized Representative of Insurer)

Joe W. Hellstern, Vice President
(Type Name) (Title)

Authorized Representative of Continental Casualty Company
(Name of Insurer)

P. O. Box 13647, Kansas City, MO 64199
(Address of Representative)

HAZARDOUS WASTE FACILITY LIABILITY ENDORSEMENT

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at USEPA ID No. MID 007 138 746, Cook Industrial Coatings, Inc. 3301 Bourke Ave., Detroit, Michigan 48238 for sudden accidental occurrences. The limits of liability are $500,000 each occurrence and $ 500,000 annual aggregate exclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsctions (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e).

(a) Bankruptcy or insolvency of the Insured shall not relieve the insurer of its obligations under the policy to which this endorsement is attached.

(b) The insurer is liability for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA) the insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of this endorsement, whether by the insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

Attached to and forming part of Policy No. CCP 005 31 00 05 issued by Continental Casualty Company herein called the Insurer, of CNA Plaza, Chicago, Illinois 60685

to Cook Industrial Coatings, Inc.

of 3301 Bourke Avenue, Detroit, Michigan 48238

this 1st day of July, 19 82. The effective date of said policy is 1st day of December, 19 79.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151 (i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Joe W. Hellstern
(Signature of Authorized Representative of Insurer)

Joe W. Hellstern, Vice President
(Type Name) (Title)

Authorized Representative of Continental Casualty Company
(Name of Insurer)

P. O. Box 13647, Kansas City, MO 64199
(Address of Representative)

HAZARDOUS WASTE FACILITY LIABILITY ENDORSEMENT

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bocily injury and property damage in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at USEPA ID No. MID 007 138 746, Cook Industrial Coatings, Inc. 3301 Bourke Avenue, Detroit, Michigan 48238

for sudden accidental occurrences. The limits of liability are $ 500,000 each occurrence and $ 1,500,000 annual aggregate excess of $ 500,000 each occurrence and $ 500,000 annual aggregate exclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsctions (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e).

   (a) Bankruptcy or insolvency of the Insured shall not relieve the insurer of its obligations under the policy to which this endorsement is attached.

   (b) The insurer is liability for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).

   (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA) the insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of this endorsement, whether by the insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

   (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

Attached to and forming part of Policy No. XLB 146 01 77 issued by

The American Insurance Company herein called the Insurer, of

Parsippany, New Jersey

to Cook Industrial Coatings, Inc.

of 3301 Bourke Avenue, Detroit, Michigan 48238

this 2nd day of July, 19 82. The effective date of said policy is

1st day of December, 19 81.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151 (i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Marion K. Smith
(Signature of Authorized Representative of Insurer)

Marion K. Smith, Assistant Vice President
(Type Name) (Title)

Authorized Representative of The American Insurance Co.
(Name of Insurer)

P. O. Box 13647, Kansas City, MO 64199
(Address of Representative)

HAZARDOUS WASTE FACILITY LIABILITY ENDORSEMENT

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bocily injury and property damage in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at USEPA ID No. MID 007 138 746, Cook Industrial Coatings, Inc. 3301 Bourke Avenue, Detroit, Michigan 48238

for sudden accidental occurrences. The limits of liability are $ 500,000 each occurrence and $ 1,500,000 annual aggregate excess of $ 500,000 each occurrence and $ 500,000 annual aggregate exclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsctions (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e).

   (a) Bankruptcy or insolvency of the Insured shall not relieve the insurer of its obligations under the policy to which this endorsement is attached.

   (b) The insurer is liability for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).

   (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA) the insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of this endorsement, whether by the insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

   (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

Attached to and forming part of Policy No. XLB 146 01 77 issued by

The American Insurance Company herein called the Insurer, of

Parsippany, New Jersey

to Cook Industrial Coatings, Inc.

of 3301 Bourke Avenue, Detroit, Michigan 48238

this 2nd day of July, 19 82. The effective date of said policy is

1st day of December, 19 81.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151 (i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Marion K. Smith
(Signature of Authorized Representative of Insurer)

Marion K. Smith, Assistant Vice President
(Type Name) (Title)

Authorized Representative of The American Insurance Co.
(Name of Insurer)

P. O. Box 13647, Kansas City, MO 64199
(Address of Representative)

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. The American Insurance Company, the Insurer,

of Parsippany, New Jersey

hereby certifies that it has issued liability insurance covering bodily injury and property damage to Cook Industrial Coatings, Inc., the Insured, of 3301 Bourke Avenue, Detroit, Michigan 48238

in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 of 265.147. The coverage applies at USEPA ID NO. MID 007 138 746, Cook Industrial Coatings, Inc., 3301 Bourke Avenue, Detroit, Michigan 48238 for sudden accidental occurrences. The limits of liability are $500,000 each occurrence and $1,500,000 annual aggregate excess of $ 500,000 each occurrence and $ 500,000 annual aggregate exclusive of legal defense costs. The coverage is provided under policy number XLB 146 01 77, issued on December 14, 1981. The effective date of said policy is December 1, 1981.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (i) or 40 CFR 265.147 (j).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Marion K. Smith
(Signature of Authorized Representative of Insurer)

Marion K. Smith, Assistant Vice President
(Type Name) (Title)

Authorized Representative of The American Insurance Co.
(Name of Insurer)

P. O. Box 13647, Kansas City, MO 64199
(Address of Representative)

MID 007 138 746

COOK

July 23, 1982

Regional Administrator
U.S. Environmental Protection Agency
Attn.: RCRA Financial Requirements
Box A3587
Chicago, Illinois 60690 - 3587

Sirs:

Regarding the liability insurance requirements for storage facility MID007138746:

Enclosed is an additional copy of our general liability insurance policy, with Hazardous Waste Endorsement, to complete our proof of insurance.

I found, looking over material I had previously forwarded to your office, that the copy of the policy submitted was for our excess umbrella policy only. With this submission, our totals will equal the $1 Million per occurance and $2 Million annual aggregate, exclusive of legal defense costs.

Sincerely,

Allen C. Kinsler
RCRA Coordinator

ACK/lr
Encl.

COOK INDUSTRIAL COATINGS, INC.
P. O. BOX 38009 — DETROIT, MICHIGAN 48238
Telex 23-0589 Phone 313—861-1000

July 16, 1982

Regional Administrator
U. S. Environmental Protection Agency
Attn.: RCRA Financial Requirements
Box A3587
Chicago, Illinois 60690-3587

Sirs:

Regarding the financial requirements of storage facility MID007138746.

I apologize for not submitting these documents by July 6, for reasons forwarded in my letter of that date.

Now that I have these documents in my possession, I am forwarding both to you as requested.

Very truly yours,

Allen C. Kinsler
RCRA Coordinator

ACK/lr
Encls.

COOK INDUSTRIAL COATINGS, INC.
P. O. BOX 38009 — DETROIT, MICHIGAN 48238
Telex 23-0589 Phone 313—861-1000

July 6, 1982

Reginal Administrator
U. S. Environmental Protection Agency
Box A 3587
Chicago, Illinois 60690-3587

Attn.: RCRA Financial Requirements

Sir:

Regarding the financial requirements for Cook Industrial Coatings, EPA ID # MID007138746:

After having been on vacation for the past two weeks, I have returned to find that we do not have the necessary papers for the closure requirement part of the April 7 Federal Register. We are entering an arrangement with the National Bank of Detroit for a standby letter of credit for $31,000, the amount which has been estimated for closure of our waste tanks and drums.

We do have our Certificate of Liability Insurance for Hazardous Waste Facilities. However, due to my conversation today with your office, I am waiting to send this along until both items are available.

These should be complete by June 23, 1982.

Sincerely,

Allen C. Kinsler
RCRA Emergency Coordinator

ACK/lr

COOK INDUSTRIAL COATINGS, INC.
P. O. BOX 38009 — DETROIT, MICHIGAN 48238
Telex 23-0589 Phone 313—861-1000

National Bank of Detroit

INTERNATIONAL DIVISION–LETTER OF CREDIT DEPARTMENT
P.O. BOX 116A
DETROIT, MICHIGAN 48232
CABLES–NATIONBANK DET TELEX #230164

Irrevocable
Standby
Letter of Credit No. 45860

Date: July 15, 1982

Original, backed now L & C file

Beneficiary:
Regional Administrator
Region V
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit No. 45860,

In your favor at the request and for the account of Cook Industrial Coatings, Inc., 3301 Bourke Avenue, Detroit, MI 48238

Up to the aggregate amount of $31,000.00 (THIRTY ONE THOUSAND AND 00/100 U.S. DOLLARS)* * *

Available upon presentation of
1) Your sight draft bearing reference to the Letter of Credit No. 45860, and

2) Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the Resource Conservation and Recovery Act of 1978 as amended."

This Letter of Credit is effective as of July 15, 1982 and shall expire on July 15, 1983, but such expiration date shall be automatically extended for a period of at least one year on July 15, 1983 and on each successive expiration date, unless, at least 120 days before the current expiration date we notify both you and Cook Industrial Coatings, Inc., by certified mail that we have decided not to extend this Letter of Credit beyond the current expiration date. In the event you are so notified, any unused portion of the Credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and Cook Industrial Coatings, Inc., as shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of Cook Industrial Coatings, Inc., in accordance with your instructions.

We certify that the wording of this letter of credit is identical to the wording specified in 40 CFR 164.151(d) as such regulations were constituted on the date shown immediately below.

This Credit is subject to the "Uniform Customs and Practice for Documentary Credits (1974 Revision), International Chamber of Commerce, Publication No. 290."

Very truly yours,

Date: July 15, 1982

Authorized Signature

Authorized Signature

This it is subject to the "Uniform Customs and Practice for Documentary Credits (1974 Revision), International Chamber of Commerce, Publication No. 290.

XC: A. Kinsler 7/12/82 ms

R. B. Jones Corporation
Commerce Tower
911 Main Street
P.O. Box 13647
Kansas City, Missouri 64199
Telephone 816 391-1000
Telex 4-2551

Alexander & Alexander

July 8, 1982

Mr. Paul W. Robbins, Assistant Secretary
Cook Industrial Coatings, Inc.
Post Office Box 38009
Detroit, Michigan 48238

RE: R.C.R.A. INSURANCE AND FINANCIAL REQUIREMENTS

Dear Paul:

Attached is the endorsement and three copies of the Certificate of Insurance evidencing the Sudden Accidental Coverage as required by the EPA in their regulations published in The Federal Register on April 16, 1982. You will note that this endorsement and certificate indicates that it provides coverage of $500,000 each occurrence and $1,500,000 annual aggregate excess of limits of $500,000 each occurrence and $500,000 annual aggregate. This certificate, along with the certificate previously furnished on the CNA policy, equals the required limits of $1,000,000 each occurrance and $2,000,000 annual aggregate.

Hopefully these will all prove to be acceptable to the EPA but should you encounter any problems please let me know.

Yours truly,

Joe W. Hellstern
mt

Joe W. Hellstern
Vice President

JWH:mt

attachments

HAZARDOUS WASTE FACILITY CERTIFICATE
of
LIABILITY INSURANCE

X Travelers Indemnity Company
__ Travelers Indemnity Company of America
__ The Phoenix Insurance Company
__ Travelers Indemnity Company of Rhode Island
__ Travelers Indemnity Company of Illinois
__ Charter Oak Fire Insurance Company

One Tower Square
Hartford, Connecticut 06115

hereby certifies that it has issued liability insurance covering bodily injury and property damage to

Name: GLASURIT AMERICA INC

Mailing Address: 3301 BOURKE AVE
DETROIT MI 48238

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

E.P.A. I.D. NUMBER	NAME	ADDRESS
1. MID 007138746	GLASURIT AMERICA INC	3301 BOURKE AVE DETROIT MI 48238

for:

X sudden accidental occurrences
__ non-sudden accidental occurrences
__ sudden and non-sudden accidental occurrences

The limits of liability are $ 500,000 each occurrence
$ 500,000 annual aggregate

exclusive of legal defense costs. The coverage is provided under

Policy Number: TR-SLG-185T975-5-83

Issued on: 12-27-83

The effective date of said policy is 01-01-83

REPLACING CERTIFICATE ISSUED 01-25-83 TO CORRECT POLICY NUMBER

KCM-095
11-22-83

(CONTINUED ON REVERSE)

CP - 2852

B. Permit Application /Post Permit

Comprehensive Permitting Report

Report run on: September 19, 2003 10:35 AM

Version: 2.0

User Selection Criteria

Location: MICHIGAN

County: All County Codes.

Handler Name:

Handler ID: MID007138746

Group of IDs: None Chosen

Results

Data meeting the criteria you selected follows.
Total Pages 3

Report Description

This report lists all permitting data for all facilities that meet the selection criteria. Unlinked Events are shown for each facility, as are Units that are not linked to either an Event or Unit Detail.

Report Information

Name:	compperm.rdf
Developed by:	EPA Headquarters, Office of Solid Waste
Deployed:	November 2002
Last Updated:	
Contact:	rcrainfo.help@epa.gov
Tables Used:	hreport_univ, pseries, pevent, pln_event_unit, punit_detail, punit, lu_state, hid_groups, gpra_ca, aevent, aln_area_event, aarea
Libraries:	decodes.pll

List of Handler Universe Abbreviations

Generator	Generator of RCRA Hazardous Waste LQG - Large Quantity Generator SQG - Small Quantity Generator CEG - Conditionally Exempt Small Quantity Generator N - nongenerator (verified)
Transporter	Transporter of RCRA Hazardous Waste
Full Enforcement	Full Enforcement
Operating TSDF	Operating Treatment, Storage, and Disposal Facility
BOYSNC	Beginning of Year Significant Non-Complier
SNC	Significant Non-Complier
Annual BOY Enf	Annual Beginning of Year Enforcement (CM&E GPRA)
Subj CA	Subject to Corrective Action
Subj CA TSD 3004	TSDFs Potentially Subject to Corrective Action Under 3004(u)/(v)
Subj CA TSD Discr	TSDFs Subject to Corrective Action Under Discretionary Authorities
Subj CA Non-TSD	Non-TSDFs Where Corrective Action Has Been Imposed
CA Wrkld	Corrective Action Workload
Perm Prgrs	Permitting/Closure/Post-Closure Progress L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment
PermWrkld	Permit Workload L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment
Clos Wrkld	Closure Workload L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment
Pclos Wrkld	Post-Closure Workload L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment
Op Pmt GPRA	Operating Permit GPRA "+" Facility has approved controls in place; "-" Facility does not have approved controls in place
Pclos GPRA	Post-Closure Permit GPRA "+" Facility has approved controls in place; "-" Facility does not have approved controls in place
CA GPRA	Corrective Action GPRA "+" All Environmental Indicators are controlled; "-" Not all Environmental Indicators are controlled
CA HE EI	Corrective Action Human Exposures Environmental Indicator "+" Human Exposures controlled; "-" Human Exposures not controlled
CA GW EI	Corrective Action Releases to Groundwater controlled Environmental Indicator "+" Release to Groundwater controlled; "-" Release to Groundwater not controlled

BASF CORP **MID007138746**
DETROIT, WAYNE COUNTY MICHIGAN Region 05

Universes

Generator:	LQG	Full Enforcement:	-----	Subj CA:	X	Perm Prgrs:	---S-	Op Pmt GPRA:
Transporter:		Operating TSDF:	-----	Subj CA TSD 3004:		Perm Wrkld:	-----	PClos GPRA:
		BOYSNC:		Subj CA TSD Discr:	X	Clos Wrkld:	-----	CA GPRA:
		SNC:		Subj CA Non-TSD:		Pclos Wrkld:	-----	CA HE EI:
		Annual BOY Enf:		CA Wrkld:				CA GW EI:

Series Name	Seq.
CLOSURE	1

Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
DRUMS	1-1	S01: CONTAINER ISIN: Interim Status - Inactive/closing, But Not Yet Rcra Closed Notes:	1	0.99	Gal	01/06/1984

Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New
CL340	US	1	EPA	MI	05/30/1984		
Description: PUBLIC NOTICE - CLOSURE							
CL370	US	1	EPA	MI	03/05/1984		
Description: RECEIVE CLOSURE CERTIFICATION							
CL310	HQ	1	EPA	MI	01/06/1984		
Description: PLAN RECEIVED - CLOSURE							

Unlinked Units and Seq. No.

Unlinked Events	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New

*** End of Report ***

Comprehensive Permitting Report

Report run on: May 15, 2003 10:04 AM

Version: 2.0

User Selection Criteria

Location: MICHIGAN

County: All County Codes.

Handler Name:

Handler ID: MID007138746

Group of IDs: None Chosen

Results

Data meeting the criteria you selected follows.
Total Pages 3

Report Description

This report lists all permitting data for all facilities that meet the selection criteria. Unlinked Events are shown for each facility, as are Units that are not linked to either an Event or Unit Detail.

Report Information

Name:	compperm.rdf
Developed by:	EPA Headquarters, Office of Solid Waste
Deployed:	November 2002
Last Updated:	
Contact:	rcrainfo.help@epa.gov
Tables Used:	hreport_univ, pseries, pevent, pln_event_unit, punit_detail, punit, lu_state, hid_groups, gpra_ca, aevent, aln_area_event, aarea
Libraries:	decodes.pll

List of Handler Universe Abbreviations

Generator	Generator of RCRA Hazardous Waste LQG - Large Quantity Generator SQG - Small Quantity Generator CEG - Conditionally Exempt Small Quantity Generator N - nongenerator (verified)
Transporter	Transporter of RCRA Hazardous Waste
Full Enforcement	Full Enforcement
Operating TSDF	Operating Treatment, Storage, and Disposal Facility
BOYSNC	Beginning of Year Significant Non-Complier
SNC	Significant Non-Complier
Annual BOY Enf	Annual Beginning of Year Enforcement (CM&E GPRA)
Subj CA	Subject to Corrective Action
Subj CA TSD 3004	TSDFs Potentially Subject to Corrective Action Under 3004(u)/(v)
Subj CA TSD Discr	TSDFs Subject to Corrective Action Under Discretionary Authorities
Subj CA Non-TSD	Non-TSDFs Where Corrective Action Has Been Imposed
CA Wrkld	Corrective Action Workload
Perm Prgrs	Permitting/Closure/Post-Closure Progress L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment
PermWrkld	Permit Workload L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment
Clos Wrkld	Closure Workload L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment
Pclos Wrkld	Post-Closure Workload L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment
Op Pmt GPRA	Operating Permit GPRA "+" Facility has approved controls in place; "-" Facility does not have approved controls in place
Pclos GPRA	Post-Closure Permit GPRA "+" Facility has approved controls in place; "-" Facility does not have approved controls in place
CA GPRA	Corrective Action GPRA "+" All Environmental Indicators are controlled; "-" Not all Environmental Indicators are controlled
CA HE EI	Corrective Action Human Exposures Environmental Indicator "+" Human Exposures controlled; "-" Human Exposures not controlled
CA GW EI	Corrective Action Releases to Groundwater controlled Environmental Indicator "+" Release to Groundwater controlled; "-" Release to Groundwater not controlled

BASF CORP **MID007138746**
DETROIT, WAYNE COUNTY MICHIGAN Region 05

Universes

Generator:	LQG	Full Enforcement:	-----	Subj CA:	X	Perm Prgrs:	---S-	Op Pmt GPRA:
Transporter:		Operating TSDF:	-----	Subj CA TSD 3004:		Perm Wrkld:	-----	PClos GPRA:
		BOYSNC:		Subj CA TSD Discr:	X	Clos Wrkld:	-----	CA GPRA:
		SNC:		Subj CA Non-TSD:		Pclos Wrkld:	-----	CA HE EI:
		Annual BOY Enf:		CA Wrkld:				CA GW EI:

Series Name	Seq.
CLOSURE	1

Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
DRUMS	1-1	S01: CONTAINER ISIN: Interim Status - Inactive/closing, But Not Yet Rcra Closed Notes:	1	0.99	Gal	01/06/1984

Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New
CL340	US	1	EPA	MI	05/30/1984		
Description: PUBLIC NOTICE - CLOSURE							
CL370	US	1	EPA	MI	03/05/1984		
Description: RECEIVE CLOSURE CERTIFICATION							
CL310	HQ	1	EPA	MI	01/06/1984		
Description: PLAN RECEIVED - CLOSURE							

Unlinked Units and Seq. No.

Unlinked Events	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New

*** End of Report ***

C.2 Compliance And Enforcement

C.2

Lawrence AuBuchon <AUBUCHOL@michigan.gov>
11/03/03 03:12 PM

To: Duncan Campbell cc: Paul Atkociunas
Subject: Re: BASF

Unfortunately there is no requirement for that notification that I am aware of.

Larry AuBuchon
Environmental Manager
Waste and Hazardous Materials Division
Michigan Department of Environmental Quality
Southeast Michigan District
38980 Seven Mile Road
Livonia, MI 48152

Phone: 734-953-1401
Fax: 734-432-1277
E-Mail: aubuchol@michigan.gov

>>> <Campbell.Duncan@epamail.epa.gov> 11/03/03 03:23PM >>>

Larry-

Last year I was assigned BASF at 3301 Bourke Street in Detroit [MID 007 138 746]. Your office elected not to participate. I showed up at what seemed to be the location only to find a vacant lot, surrounded by a chain link fence. The build(s) had been raised. All that was left was a small pile of debris. I asked someone at a neighboring facility for information only to learn that the buildings had been torn down some time ago. I was unable to identify a current owner of the property. Once I got back I asked our librarian to find anything which might answer when this property was vaccated. The attached D & B is the extent of the information she found for this address.

Larry, does MDEQ have a requirement to notify if a facility closes/abandons or ceases to exist?

Thanks
DC

(See attached file: BASF Corp 3301 Bourke.wpd)

C-2

Duncan Campbell

11/03/03 02:12 PM

To: aubuchol@michigan.gov
cc: Paul Atkociunas/R5/USEPA/US
cc:
Subject: BASF

Larry-

Last year I was assigned BASF at 3301 Bourke Street in Detroit [MID 007 138 746]. Your office elected not to participate. I showed up at what seemed to be the location only to find a vacant lot, surrounded by a chain link fence. The build(s) had been raised. All that was left was a small pile of debris. I asked someone at a neighboring facility for information only to learn that the buildings had been torn down some time ago. I was unable to identify a current owner of the property. Once I got back I asked our librarian to find anything which might answer when this property was vaccated. The attached D & B is the extent of the information she found for this address.

Larry, does MDEQ have a requirement to notify if a facility closes/abandons or ceases to exist?

Thanks
DC

BASF Corp 3301 Bourke.

C2

Duncan Campbell

10/01/03 09:23 AM

To: yokumw@michigan.gov
cc:
cc:
Subject: Help

Bill-

During September I showed up at a facility but the facility wasn't there. Could you do a search for me to see if you can find when it moved/went out of biz?

BASF
3301 Bourke Street
Detroit, MI 48238
MID 007 138 746

Thanks
DC

C2

Duncan Campbell

09/19/03 09:13 AM

To: yokumb@michigan.gov
cc:
cc:
Subject: Help

Bill-

I went to an empty lot yesterday. It was supposed to be a BASF facility. Through you can I learn when they might have moved? The epa id was MID 007 138 746. What are the requirements to notify the state when closing a facility? Can you determine whether they met these requirements?

Thanks
DC

U.S. Environmental Protection Agency

Toxics Release Inventory (TRI)

Envirofacts Report

Query executed on AUG-15-2002
Results are based on data extracted on MAY-23-2002

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	BASF CORP.	Mailing Name:	BASF CORP.
Address:	3301 BOURKE AVE. DETROIT MI 48238	Mailing Address:	3301 BOURKE AVE. DETROIT MI 48238
County:	WAYNE	Region:	5
Facility Information:	View Facility Information	TRI ID:	48238BSFCR3301B DUNS Number
TRI Preferred Latitude:	42.384444	TRI Preferred Longitude:	83.1375
Public Contact:	WILLAIM HARDIGAN	Phone:	5192563155
Parent Company:	BASF CORP.	Parent DUNS:	071014385

SIC Codes for 2000

SIC CODE	SIC DESCRIPTION
2851	PAINTS, VARNISHES, LACQUERS, ENAMELS, AND ALLIED PRODUCTS

The above information comes from 2000, which is the latest reporting year on file for this facility. The ear year on file for this facility is 1987.

Map this facility

Map this facility using one of Envirofact's mapping utilities.

Besides TRI, this facility also does the following:

- has reported air releases under the Clean Air Act

More information about these additional regulatory aspects of this facility can be found by pressing the data button below.

Other Regulatory Data

Total Aggregate Releases of TRI Chemicals to the Environment:

*For all releases estimated as a range, the mid-point of the range was used in these calculations. This table summ releases reported by the facility. **NR** - signifies nothing reported by this facility for the corresponding medium.*

Total Aggregate Releases of TRI Chemicals excluding Dioxin and Dioxin-like Compo (Measured in Pounds)

Media	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989
Air Emissions	7858	26153	44660	135329	132312	271240	360650	275309	243855	238020	108435	248750
Surface Water Discharges	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Releases to Land	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Underground Injection	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Total On-Site Releases	7858	26153	44660	135329	132312	271240	360650	275309	243855	238020	108435	248750
Transfer Off-Site to Disposal	NR	NR	NR	NR	140	NR	NR	250	3105	1360	750	141900
Total Releases	7858	26153	44660	135329	132452	271240	360650	275559	246960	239380	109185	390650

Graphic Summary of this Table

Total Aggregate Releases of Dioxin and Dioxin-like Compounds (Measured in Grams)

Media	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989	1
Air Emissions	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Surface Water Discharges	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Releases to Land	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Underground Injection	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Total On-Site Releases	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Transfer Off-Site to Disposal	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Total Releases	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	

Graphic Summary of this Table

TRI Chemicals Reported on Form A:

Please note that there were no chemicals reported on Form A for this facility

NOTE:
All chemicals reported below have release or transfer amounts greater than zero. To see a list of all chemicals reported by this facility click here.

Names and Amounts of Chemicals Released to the Environment by Year.

*For all releases estimated as a range, the mid-point of the range was used in these calculations. **NR** - signifies nothing reported for this facility by the corresponding medium. Rows with all "0" or "NR" values were not listed.*

Chemical Name	Media	Unit Of Measure	2000	1999	1998	1997	1996	1995	1994	1993	1
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	AIR FUG	Pounds	56	400	360	2460	2150	19000	24000	15000	4
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	AIR STACK	Pounds	72	1000	650	3270	11000	2600	3400	2200	1
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
ACETONE (TRI Chemical ID: 000067641)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
ACETONE (TRI Chemical ID: 000067641)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
ACETONE (TRI Chemical ID: 000067641)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
ACRYLIC ACID (TRI Chemical ID: 000079107)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
ACRYLIC ACID (TRI Chemical ID: 000079107)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
ACRYLIC ACID (TRI Chemical ID: 000079107)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
BARIUM COMPOUNDS (TRI Chemical ID: N040)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
BARIUM COMPOUNDS (TRI Chemical ID: N040)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
BARIUM COMPOUNDS (TRI Chemical ID: N040)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	3
BUTYL ACRYLATE (TRI Chemical ID: 000141322)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
BUTYL ACRYLATE (TRI Chemical ID: 000141322)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
BUTYL ACRYLATE (TRI Chemical ID: 000141322)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	AIR FUG	Pounds	NR	10	60	20	5	5300	4500	NR	3
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	AIR STACK	Pounds	NR	1300	570	1870	250	260	250	NR	
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	

COPPER (TRI Chemical ID: 007440508)	AIR STACK	Pounds	NR	NR	NR	NR	2	NR	NR	NR	
COPPER (TRI Chemical ID: 007440508)	DISP NON METALS	Pounds	NR	NR	NR	NR	140	NR	NR	NR	
COPPER COMPOUNDS (TRI Chemical ID: N100)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
COPPER COMPOUNDS (TRI Chemical ID: N100)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
COPPER COMPOUNDS (TRI Chemical ID: N100)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
CUMENE (TRI Chemical ID: 000098828)	AIR FUG	Pounds	NR	120	120	120	100	550	1200	750	1
CUMENE (TRI Chemical ID: 000098828)	AIR STACK	Pounds	NR	80	130	480	300	700	1500	950	
CUMENE (TRI Chemical ID: 000098828)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
CUMENE HYDROPEROXIDE (TRI Chemical ID: 000080159)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
CUMENE HYDROPEROXIDE (TRI Chemical ID: 000080159)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
CUMENE HYDROPEROXIDE (TRI Chemical ID: 000080159)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
ETHYLBENZENE (TRI Chemical ID: 000100414)	AIR FUG	Pounds	840	900	1000	5120	1200	22000	28000	18000	6
ETHYLBENZENE (TRI Chemical ID: 000100414)	AIR STACK	Pounds	290	1500	1900	25820	10000	6900	8800	5700	5
ETHYLBENZENE (TRI Chemical ID: 000100414)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
FORMALDEHYDE (TRI Chemical ID: 000050000)	AIR FUG	Pounds	NR	NR	NR	NR	250	NR	NR	NR	
FORMALDEHYDE (TRI Chemical ID: 000050000)	AIR STACK	Pounds	NR	NR	NR	NR	24200	NR	NR	NR	
FORMALDEHYDE (TRI Chemical ID: 000050000)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
LEAD COMPOUNDS (TRI Chemical ID: N420)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	250	
LEAD COMPOUNDS (TRI Chemical ID: N420)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	210	
LEAD COMPOUNDS (TRI Chemical ID: N420)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	250	
METHANOL (TRI Chemical ID: 000067561)	AIR FUG	Pounds	110	400	1200	290	250	6700	8200	9100	33
METHANOL (TRI Chemical ID: 000067561)	AIR STACK	Pounds	260	2000	9000	1030	1100	3100	3800	4200	4
METHANOL (TRI Chemical ID: 000067561)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	AIR FUG	Pounds	NR	300	770	370	NR	13200	26000	46000	40

METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	AIR STACK	Pounds	NR	800	2400	10	NR	5500	11000	19000	18
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	AIR FUG	Pounds	NR	100	530	590	NR	NR	NR	NR	
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	AIR STACK	Pounds	NR	300	3700	10	NR	NR	NR	NR	
METHYL METHACRYLATE (TRI Chemical ID: 000080626)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	470	2
METHYL METHACRYLATE (TRI Chemical ID: 000080626)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	330	
METHYL METHACRYLATE (TRI Chemical ID: 000080626)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	AIR FUG	Pounds	720	2600	2700	9300	6500	37500	61000	42000	23
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	AIR STACK	Pounds	110	900	1900	8310	13000	9400	15000	11000	11
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
N-METHYL-2-PYRROLIDONE (TRI Chemical ID: 000872504)	AIR FUG	Pounds	0	3	20	5	250	NR	NR	NR	
N-METHYL-2-PYRROLIDONE (TRI Chemical ID: 000872504)	AIR STACK	Pounds	0	30	170	64	1100	NR	NR	NR	
NICKEL COMPOUNDS (TRI Chemical ID: N495)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
NICKEL COMPOUNDS (TRI Chemical ID: N495)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
STYRENE (TRI Chemical ID: 000100425)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	130	
STYRENE (TRI Chemical ID: 000100425)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	19	
STYRENE (TRI Chemical ID: 000100425)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
TOLUENE (TRI Chemical ID: 000108883)	AIR FUG	Pounds	NR	410	980	580	5	530	NR	NR	
TOLUENE (TRI Chemical ID: 000108883)	AIR STACK	Pounds	NR	1300	6000	10	250	0	NR	NR	
TOLUENE (TRI Chemical ID: 000108883)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	AIR FUG	Pounds	3900	3700	3600	18210	37000	105000	125000	76000	63
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	AIR STACK	Pounds	1500	8000	6900	57390	23400	33000	39000	24000	24
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	

Discharge of Chemicals into Streams or Bodies of Water:

Please note that either there were no releases of chemicals into streams or bodies of water reported by this facility or the facility did not file a TRI form R for the years 1987 to 2000. Rows with Release Amount equal to "0" were not listed.

Transfer of Chemicals to Off-Site Locations other than POTWs:

Please note that transfer amounts are not included in release totals shown above. For all releases estimated as a range, the mid-point of the range was used in these calculations. Rows with Total Transfer Amount equal to "0" were not listed.

Chemical Name	Year	Unit Of Measure	Total Transfer Amount	Transfer Site Name and Address	Type Of Waste Management
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	2000	Pounds	175	ENSCO 309 AMERICAN CIRCLE EL DORADO, AR 71730	Transfer to Waste Broker-Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	2000	Pounds	6	MICHIGAN DISPOSAL, INC. 49350 NORTH SERVICE DRIVE BELLEVILLE, MI 48111	Wastewater Treatment (Excluding POTW)
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	2000	Pounds	940	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	2000	Pounds	690	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	2000	Pounds	60	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Transfer to Waste Broker-Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	2000	Pounds	3600	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	2000	Pounds	4500	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Transfer to Waste Broker-Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	2000	Pounds	3300	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
				CWM RESOURCE RECOVERY INC	

1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1999	Pounds	330	4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Transfer to Waste Broker-Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1999	Pounds	1700	US FILTER CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1999	Pounds	9400	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Transfer to Waste Broker-Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1999	Pounds	22000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1999	Pounds	2000	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1999	Pounds	7300	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1999	Pounds	2200	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Transfer to Waste Broker-Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1999	Pounds	5400	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1999	Pounds	890	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Transfer to Waste Broker-Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	1500	CWM RESOURCE RECOVERY INC 4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	5900	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	3900	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Energy Recovery
				ROSS	

1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	1300	ENVIRONMENTAL SERVICES 36790 GILES ROAD GRAFTON, OH 44044	Incineration/Thermal Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	1700	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	760	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Incineration/Thermal Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	29000	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	280	US FILTER CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	57000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1998	Pounds	20000	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1997	Pounds	27311	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1997	Pounds	43000	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1997	Pounds	9664	CLEAN HARBORS SVCS. INC. 11800 S. STONY ISLAND AVE. CHICAGO, IL 60617	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1996	Pounds	152000	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
				PETROCHEM	

1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1995	Pounds	242000	PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1995	Pounds	9100	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1995	Pounds	5	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1994	Pounds	750	ENSA OF INDIANA 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1994	Pounds	6300	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1994	Pounds	5500	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1994	Pounds	2300	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1994	Pounds	6000	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACK LICK, OH 43004	Other Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1994	Pounds	750	SAFETY-KLEEN CORP. 3700 LAGRANGE RD. SMITHFIELD, KY 40068	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1994	Pounds	250	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1993	Pounds	4300	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1993	Pounds	3800	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1993	Pounds	66000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Energy Recovery

1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1993	Pounds	140	CHEMICAL WASTE MANAGEMENT-RMI 5371 COOK RD. MORROW, GA 30260	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1993	Pounds	36000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1993	Pounds	6000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1992	Pounds	1100	INDUSTRIAL FUELS & RESOURCES 640 S. SCOTT ST. S. BEND, IN 46625	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1992	Pounds	70	COLUMBUS STEEL DRUM CO. 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1992	Pounds	300	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1992	Pounds	2100	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1992	Pounds	5800	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1991	Pounds	30000	PETRO CHEMI PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1991	Pounds	1100	INDUSTRIAL FUELS & RESOURCES, INC. 640 S. SCOTT ST. SOUTH BEND, IN 46625	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1991	Pounds	540	LAIDLAW ENVIRONMENTAL SRVCS. TELFER SIDE RD. CORRUNNA ONTARIO,	Energy Recovery
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1990	Pounds	5	LAIDLAW (SARNIA) LTD TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
				COLUMBUS STEEL	

1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1990	Pounds	250	DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Incineration/Thermal Treatment
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1989	Pounds	11000	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
ACETONE (TRI Chemical ID: 000067641)	1989	Pounds	250	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
ACETONE (TRI Chemical ID: 000067641)	1989	Pounds	250	LWD INC. HWY. 1523 CALVERT CITY, KY 42029	Incineration/Thermal Treatment
ACETONE (TRI Chemical ID: 000067641)	1989	Pounds	250	TRICIL (SARNIA) LTD. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
ACETONE (TRI Chemical ID: 000067641)	1988	Pounds	250	CHEMICAL WASTE MGMT., EMELLE FACILITY STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
ACETONE (TRI Chemical ID: 000067641)	1988	Pounds	1600	TRICIL SARNIA LTD. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
ACETONE (TRI Chemical ID: 000067641)	1987	Pounds	8800	TRICIL (SARNIA) ONTARIO TELFER SIDE ROAD CORRUNNA,	Incineration/Thermal Treatment
ACRYLIC ACID (TRI Chemical ID: 000079107)	1992	Pounds	380	COLUMBUS STEEL DRUM CO. 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
ACRYLIC ACID (TRI Chemical ID: 000079107)	1991	Pounds	790	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
ACRYLIC ACID (TRI Chemical ID: 000079107)	1990	Pounds	1000	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Incineration/Thermal Treatment
ACRYLIC ACID (TRI Chemical ID: 000079107)	1988	Pounds	250	CHEMICAL WASTE MANAGER, EMELLE FACILITY STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
				INDUSTRIAL FUELS &	

BARIUM COMPOUNDS (TRI Chemical ID: N040)	1992	Pounds	4400	RESOURCES, INC. 640 S. SCOTT ST. S. BEND, IN 46625	Incineration/Insignificant Fuel Value
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1992	Pounds	260	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Insignificant Fuel Value
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1992	Pounds	920	COLUMBUS STEEL DRUM CO. 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1992	Pounds	3100	CITY SAND & LANDFILL 46805 WILLOW RD. SUMPTER, MI 48111	Landfill/Disposal Surface Impoundment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1992	Pounds	28000	PETRO CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Incineration/Insignificant Fuel Value
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1991	Pounds	23000	PETRO CHEMI PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Incineration/Insignificant Fuel Value
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1991	Pounds	430	CITY SAND & LANDFILL 46805 WILLOW RD. SUMPTER, MI 48111	Landfill/Disposal Surface Impoundment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1991	Pounds	430	WOODLAND MEADOWS LANDFILL 4620 HANNAN RD. CANTON, MI 48188	Landfill/Disposal Surface Impoundment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1991	Pounds	800	INDUSTRIAL FUELS & RESOURCES, INC. 640 S. SCOTT ST. SOUTH BEND, IN 46625	Incineration/Insignificant Fuel Value
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1991	Pounds	400	LAIDLAW ENVIRONMENTAL SRVCS. TELFER SIDE RD. CORRUNNA, LAMBTON,	Incineration/Insignificant Fuel Value
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1990	Pounds	750	WOODLAND MEADOWS LANDFILL 4620 HANNAN RD. CANTON, MI 48188	Landfill/Disposal Surface Impoundment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1990	Pounds	750	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Incineration/Thermal Treatment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1990	Pounds	250	LAIDLAW (SARNIA) LTD TELFER SIDE RD. CORUNNA,	Incineration/Thermal Treatment

BARIUM COMPOUNDS (TRI Chemical ID: N040)	1989	Pounds	250	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1989	Pounds	9300	WOODLAND MEADOWS 4620 HANNAN CANTON, MI 48188	Landfill/Disposal Surface Impoundment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1988	Pounds	6700	CHEMICAL WASTE MGMT., EMELLE FACILITY STATE HWY 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1988	Pounds	20000	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Incineration/Thermal Treatment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1988	Pounds	31000	SOLVENT DISTILLERS INC. 421 LYCASTE DETROIT, MI 48214	Incineration/Thermal Treatment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1988	Pounds	750	POLLUTION CONTROL INDUSTRIES, OF AMERICA 4343 KENNEDY AVE. EAST CHICAGO, IN 46312	Incineration/Thermal Treatment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1988	Pounds	3700	TRICIL SARNIA LTD. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1987	Pounds	6300	CHEMICAL WASTE MANAGEMENT, EMELLE FACILITY STATE HIGHWAY 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
BARIUM COMPOUNDS (TRI Chemical ID: N040)	1987	Pounds	120000	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
BUTYL ACRYLATE (TRI Chemical ID: 000141322)	1992	Pounds	8000	INDUSTRIAL FUELS & RESOURCES 640 S. SCOTT ST. SOUTH BEND, IN 46625	Energy Recovery
BUTYL ACRYLATE (TRI Chemical ID: 000141322)	1992	Pounds	750	LAIDLAW ENVIRONMENTAL SERVICES, INC. TELFER SIDE RD. CORRUNNA CA,	Incineration/Thermal Treatment
				CHEMICAL WASTE MANAGER EMELLE,	

BUTYL ACRYLATE (TRI Chemical ID: 000141322)	1988	Pounds	250	FACILITY STATE HWY 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
BUTYL ACRYLATE (TRI Chemical ID: 000141322)	1987	Pounds	1100	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1999	Pounds	1500	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Transfer to Waste Broker-Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1999	Pounds	620	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Transfer to Waste Broker-Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1999	Pounds	5100	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1999	Pounds	2700	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1999	Pounds	6600	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Transfer to Waste Broker-Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1999	Pounds	1400	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1999	Pounds	50	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1998	Pounds	600	CWM RESOURCE RECOVERY INC 4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1998	Pounds	490	ROSS ENVIRONMENTAL SERVICES 36790 GILES ROAD GRAFTON, OH 44044	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1998	Pounds	2300	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Energy Recovery

CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1998	Pounds	330	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1998	Pounds	300	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1998	Pounds	11000	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1998	Pounds	13000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1998	Pounds	8000	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1998	Pounds	1500	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1997	Pounds	63434	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1997	Pounds	22679	CLEAN HARBORS SVCS. INC. 11800 S. STONY ISLAND AVE. CHICAGO, IL 60617	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1997	Pounds	3434	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1996	Pounds	187500	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1996	Pounds	3600	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1995	Pounds	166200	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery

CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1995	Pounds	6000	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Insignificant Fuel Value
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1995	Pounds	2600	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1994	Pounds	1000	ENSA OF INDIANA 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1994	Pounds	250	ENSA OF INDIANA 604 S. SCOTT ST. SOUTH BEND, IN 46624	Transfer to Waste Broker-Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1994	Pounds	370000	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1994	Pounds	8500	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1994	Pounds	51000	SAFETY-KLEEN CORP. 3700 LAGRANGE RD. SMITHFIELD, KY 40068	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1994	Pounds	2200	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACK LICK, OH 43004	Other Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1994	Pounds	140000	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1994	Pounds	320000	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1992	Pounds	5900	INDUSTRIAL FUELS & RESOURCES, INC. 640 S. SCOTT ST. S. BEND, IN 46625	Transfer to Waste Broker-Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1992	Pounds	22000	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1992	Pounds	130	COLUMBUS STEEL DRUM CO. 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment

CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1991	Pounds	39000	PETRO CHEMI PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1991	Pounds	1200	LAIDLAW ENVIRONMENTAL SRVCS. TELFER SIDE RD. CORRUNNA, LANBTON,	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1991	Pounds	250	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1991	Pounds	630	LAIDLAW ENVIRONMENTAL SRVCS. TELFER SIDE RD. CORRUNNA, LAMBTON,	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1991	Pounds	6500	ROSS INCINERATION SRVCS. 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1991	Pounds	1500	INDUSTRIAL FUELS & RESOURCES 640 S. SCOTT ST. SOUTH BEND, IN 46625	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1991	Pounds	3700	INDUSTRIAL FUELS & RESOURCES 640 S. SCOTT ST. SOUTH BEND, IN 46625	Transfer to Waste Broker-Waste Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1990	Pounds	5	LAIDLAW (SARNIA) LTD TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1990	Pounds	250	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1989	Pounds	2500	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1988	Pounds	1500	CHEMICAL WASTE MGMT., EMELLE FACILITY STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1988	Pounds	13000	TRICIL SARNIA LTD. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment

CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1987	Pounds	21000	TRICIL (SARNIA) ONTARIO TELFER SIDE ROAD CORRUNNA,ONTARIO, CANADA,	Incineration/Thermal Treatment
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1987	Pounds	9800	LWD, INC. HIGHWAY 153 CALVERT CITY, KY 48214	Solvents/Organics Recovery
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1992	Pounds	3400	INDUSTRIAL FUELS & RESOURCES, INC. 640 S. SCOTT ST. S. BEND, IN 46625	Incineration/Insignificant Fuel Value
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1992	Pounds	18000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Incineration/Insignificant Fuel Value
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1992	Pounds	5	CITY SAND & LANDFILL 46805 WILLOW RD. SUMPTER, MI 48111	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1992	Pounds	605	COLUMBUS STEEL DRUM CO. 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1989	Pounds	250	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1989	Pounds	250	WOODLAND MEADOWS 4620 HANNAN CANTON, MI 48188	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1988	Pounds	750	CHEMICAL WASTE MGMT., EMELLE FACILITY STATE HWY 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1988	Pounds	2400	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Incineration/Thermal Treatment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1988	Pounds	250	TRICIL SARNIA LTD. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1988	Pounds	3700	SOLVENT DISTILLERS INC. 421 LYCASTE DETROIT, MI 48214	Incineration/Thermal Treatment

CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1988	Pounds	750	INDUSTRIAL FUELS & RESOURCES 640 SOUTH SCOTT SOUTH BEND, IN 46625	Incineration/Thermal Treatment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1988	Pounds	250	POLLUTION CONTROL INDUSTRIES, OF AMERICA 4343 KENNEDY AVE. EAST CHICAGO, IN 46312	Incineration/Thermal Treatment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1988	Pounds	250	SOLVENT RESOURCE RECOVERY 4301 INFIRMARY RD. WEST CARROLLTON, OH 45449	Incineration/Thermal Treatment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1987	Pounds	750	CHEMICAL WASTE MANAGEMENT, EMELLE FACILITY STATE HIGHWAY 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1987	Pounds	4500	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
COPPER (TRI Chemical ID: 007440508)	1996	Pounds	25000	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
COPPER (TRI Chemical ID: 007440508)	1996	Pounds	140	WOODLAND MEADOWS RECYCLING &, DISPOSAL 5900 HANNAN RD. WAYNE, MI 48184	Other Land Disposal
COPPER COMPOUNDS (TRI Chemical ID: N100)	1991	Pounds	250	WOODLAND MEADOWS LANDFILL 4620 HANNAN RD. CANTON, MI 48188	Landfill/Disposal Surface Impoundment
COPPER COMPOUNDS (TRI Chemical ID: N100)	1991	Pounds	250	CITY SAND & LANDFILL 46805 WILLOW RD. SUMPTER, MI 48111	Landfill/Disposal Surface Impoundment
COPPER COMPOUNDS (TRI Chemical ID: N100)	1989	Pounds	250	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
COPPER COMPOUNDS (TRI Chemical ID: N100)	1989	Pounds	250	LWD INC. HWY. 1523 CALVERT CITY, KY 42029	Incineration/Thermal Treatment
				WOODLAND	

COPPER COMPOUNDS (TRI Chemical ID: N100)	1989	Pounds	250	MEADOWS 4620 HANNAN CANTON, MI 48188	Landfill/Disposal Surface Impoundment
CUMENE (TRI Chemical ID: 000098828)	1999	Pounds	50	CWM RESOURCE RECOVERY INC 4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Transfer to Waste Broker-Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1999	Pounds	70	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1999	Pounds	330	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Transfer to Waste Broker-Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1999	Pounds	660	US FILTER CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1999	Pounds	970	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
CUMENE (TRI Chemical ID: 000098828)	1999	Pounds	250	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1999	Pounds	80	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Transfer to Waste Broker-Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1999	Pounds	30	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Transfer to Waste Broker-Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1999	Pounds	260	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	60	CWM RESOURCE RECOVERY INC 4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	30	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Incineration/Thermal Treatment

CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	140	US FILTER CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	1100	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	2400	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	790	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	50	ROSS ENVIRONMENTAL SERVICES 36790 GILES ROAD GRAFTON, OH 44044	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	230	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	150	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1998	Pounds	80	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1997	Pounds	4093	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1997	Pounds	2000	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
CUMENE (TRI Chemical ID: 000098828)	1997	Pounds	1449	CLEAN HARBORS SVCS. INC. 11800 S. STONY ISLAND AVE. CHICAGO, IL 60617	Energy Recovery
				COLUMBUS STEEL	

CUMENE (TRI Chemical ID: 000098828)	1997	Pounds	511	DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	1996	Pounds	13300	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1996	Pounds	300	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1995	Pounds	800	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1995	Pounds	260	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1995	Pounds	5	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	1994	Pounds	250	ENSA OF INDIANA 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1994	Pounds	5500	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1994	Pounds	2300	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1994	Pounds	250	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACK LICK, OH 43004	Other Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1994	Pounds	750	SAFETY-KLEEN CORP. 3700 LAGRANGE RD. SMITHFIELD, KY 40068	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1994	Pounds	250	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	1994	Pounds	6300	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery

CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	1400	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	46	CHEMICAL WASTE MANAGEMENT-RMI 5371 COOK RD. MORROW, GA 30260	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	180	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	4500	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	750	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	8200	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1992	Pounds	6400	PETRO CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1992	Pounds	6800	PETRO CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
CUMENE (TRI Chemical ID: 000098828)	1992	Pounds	3100	INDUSTRIAL FUELS & RESOURCES 640 S. SCOTT ST. S. BEND, IN 46625	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1992	Pounds	200	COLUMBUS STEEL DRUM CO. 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
CUMENE (TRI Chemical ID: 000098828)	1992	Pounds	900	ROSS INCINERATION SERVICES INC 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	1990	Pounds	5	LAIDLAW (SARNIA) LTD TELFER SIDE RD. CORUNNA,	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	1990	Pounds	250	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Incineration/Thermal Treatment

CUMENE (TRI Chemical ID: 000098828)	1989	Pounds	2500	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
CUMENE HYDROPEROXIDE (TRI Chemical ID: 000080159)	1991	Pounds	520	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
CUMENE HYDROPEROXIDE (TRI Chemical ID: 000080159)	1988	Pounds	250	CHEMICAL WASTE MANAGER, EMELLE FACILITY STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	2000	Pounds	36	ENSCO 309 AMERICAN CIRCLE EL DORADO, AR 71730	Transfer to Waste Broker-Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	2000	Pounds	43	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	2000	Pounds	630	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	2000	Pounds	22000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	2000	Pounds	4200	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Transfer to Waste Broker-Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	2000	Pounds	3300	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	2000	Pounds	39	MICHIGAN DISPOSAL, INC. 49350 NORTH SERVICE DRIVE BELLEVILLE, MI 48111	Wastewater Treatment (Excluding POTW)
ETHYLBENZENE (TRI Chemical ID: 000100414)	2000	Pounds	55	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Transfer to Waste Broker-Energy Recovery
				CWM RESOURCE RECOVERY INC	

ETHYLBENZENE (TRI Chemical ID: 000100414)	1999	Pounds	40	4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Transfer to Waste Broker-Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1999	Pounds	330	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1999	Pounds	5100	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1999	Pounds	140000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1999	Pounds	60	US FILTER CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1999	Pounds	6600	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Transfer to Waste Broker-Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1999	Pounds	1400	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1999	Pounds	1500	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Transfer to Waste Broker-Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1999	Pounds	620	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Transfer to Waste Broker-Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	1000	CWM RESOURCE RECOVERY INC 4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	2700	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	14000	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Energy Recovery

ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	320000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	20	US FILTER CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	19000	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	510	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	320	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	850	ROSS ENVIRONMENTAL SERVICES 36790 GILES ROAD GRAFTON, OH 44044	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1998	Pounds	4000	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1997	Pounds	55443	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1997	Pounds	407000	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1997	Pounds	19329	CLEAN HARBORS SVCS. INC. 11800 S. STONY ISLAND AVE. CHICAGO, IL 60617	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1996	Pounds	236300	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
				ROSS INCINERATION	

ETHYLBENZENE (TRI Chemical ID: 000100414)	1996	Pounds	250	SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1996	Pounds	5000	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1995	Pounds	123000	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1995	Pounds	250	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1995	Pounds	6000	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Insignificant Fuel Value
ETHYLBENZENE (TRI Chemical ID: 000100414)	1995	Pounds	103000	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1995	Pounds	5600	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1994	Pounds	3500	ENSA OF INDIANA 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1994	Pounds	6300	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1994	Pounds	250	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1994	Pounds	7100	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACK LICK, OH 43004	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1994	Pounds	750	SAFETY-KLEEN CORP. 3700 LAGRANGE RD. SMITHFIELD, KY 40068	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1994	Pounds	2300	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment

ETHYLBENZENE (TRI Chemical ID: 000100414)	1994	Pounds	5500	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	30000	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	1700	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	56000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	5100	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	31000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	930	CHEMICAL WASTE MANAGEMENT-RMI 5371 COOK RD. MORROW, GA 30260	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	4800	INDUSTRIAL FUELS & RESOURCES, INC. 640 S. SCOTT ST. S. BEND, IN 46625	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	360	ROSS INCINERATION SERVICES INC 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	900	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	4500	LAIDLAW ENVIRONMENTAL SERVICES, INC. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	6000	INDUSTRIAL FUELS & RESOURCES, INC. 640 S. SCOTT ST. S. BEND, IN 46625	Transfer to Waste Broker-Waste Treatment
				PETRO CHEM	

ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	27000	PROCESSING 421 LYCASTE DETROIT, MI 48214	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	96000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	31000	PETRO CHEMI PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	400	LAIDLAW ENVIRONMENTAL SRVCS. TELFER SIDE RD. CORRUNNA LAMBTON,	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	390	ROSS INCINERATIONS SRVCS. INC. 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	200000	PETRO CHEMI PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	3000	INDUSTRIAL FUELS & RESOURCES 640 S. SCOTT ST. SOUTH BEND, IN 46625	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1990	Pounds	750	LAIDLAW (SARNIA) LTD TELFER SIDE RD. CORUNNA,	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1990	Pounds	750	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1989	Pounds	3100	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1989	Pounds	250	LWD INC. HWY. 1523 CALVERT CITY, KY 42029	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1989	Pounds	250	TRICIL (SARNIA) LTD. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1988	Pounds	6700	CHEMICAL WASTE MANAGER, EMELLE FACILITY STATE HWY. 17	Landfill/Disposal Surface Impoundment

				EMELLE, AL 35459	
ETHYLBENZENE (TRI Chemical ID: 000100414)	1988	Pounds	12000	LWD INC. HWY. 1523 CALVERT CITY, KY 42029	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1988	Pounds	250	TRICIL SARNIA LTD. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1987	Pounds	6400	CHEMICAL WASTSE MANAGEMENT, EMELLE FACILITY STATE HIGHWAY 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1987	Pounds	30000	PETROCHEM PROCESSING, INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1987	Pounds	250	TRICIL (SARNIA) ONTARIO TELFER SIDE ROAD CORRUNNA,OBTARIO, CANADA,	Incineration/Thermal Treatment
FORMALDEHYDE (TRI Chemical ID: 000050000)	1996	Pounds	12500	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
FORMALDEHYDE (TRI Chemical ID: 000050000)	1996	Pounds	120	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
FORMALDEHYDE (TRI Chemical ID: 000050000)	1989	Pounds	750	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1993	Pounds	96	TRADE WASTE INCINERATION #7 MOBILE AVE. SAUGET, IL 62201	Transfer to Waste Broker-Waste Treatment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1993	Pounds	58	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1993	Pounds	250	WOODLAND MEADOWS 4620 HANNAN RD. CANTON, MI 48184	Landfill/Disposal Surface Impoundment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1993	Pounds	250	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Incineration/Insignificant Fuel Value

LEAD COMPOUNDS (TRI Chemical ID: N420)	1988	Pounds	250	CHEMICAL WASTE MGMT, EMELLE FACILITY STATE HWY. EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1988	Pounds	1500	SOLVENT DISTILLERS INC. 421 LYCASTE DETROIT, MI 48214	Incineration/Thermal Treatment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1988	Pounds	250	POLLUTION CONTROL INDUSTRIES, OF AMERICA 4343 KENNEDY AVE. E. CHICAGO, IN 46312	Incineration/Thermal Treatment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1988	Pounds	250	INDUSTRIAL FUELS & RESOURCES 640 SOUTH SCOTT SOUTH BEND, IN 46625	Incineration/Thermal Treatment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1988	Pounds	250	SOLVENT RESOURCE RECOVERY 4301 INFIRMARY RD. WEST CARROLLTON, OH 45449	Incineration/Thermal Treatment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1988	Pounds	750	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Incineration/Thermal Treatment
LEAD COMPOUNDS (TRI Chemical ID: N420)	1988	Pounds	250	TRICIL SARNIA LTD. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	2000	Pounds	1400	PETRO-CHEM PROCESSING 421 LYCASTE STREET DETROIT, MI 48214	Transfer to Waste Broker-Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	2000	Pounds	61	ENSCO 309 AMERICAN CIRCLE EL DORADO, AR 71730	Transfer to Waste Broker-Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	2000	Pounds	3	MICHIGAN DISPOSAL, INC. 49350 NORTH SERVICE DRIVE BELLEVILLE, MI 48111	Wastewater Treatment (Excluding POTW)
METHANOL (TRI Chemical ID: 000067561)	2000	Pounds	19	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Transfer to Waste Broker-Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	2000	Pounds	900	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment

METHANOL (TRI Chemical ID: 000067561)	2000	Pounds	1100	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	2000	Pounds	210	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	2000	Pounds	1800	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
METHANOL (TRI Chemical ID: 000067561)	1999	Pounds	160	CWM RESOURCE RECOVERY INC 4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Transfer to Waste Broker-Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1999	Pounds	770	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Transfer to Waste Broker-Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1999	Pounds	310	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Transfer to Waste Broker-Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1999	Pounds	5000	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1999	Pounds	2500	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1999	Pounds	680	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1999	Pounds	12000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
METHANOL (TRI Chemical ID: 000067561)	1999	Pounds	3300	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Transfer to Waste Broker-Energy Recovery
				US FILTER	

METHANOL (TRI Chemical ID: 000067561)	1999	Pounds	3	CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	320	CWM RESOURCE RECOVERY INC 4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	270	ROSS ENVIRONMENTAL SERVICES 36790 GILES ROAD GRAFTON, OH 44044	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	1300	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	830	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	7200	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	4300	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	160	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	20000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	6100	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1998	Pounds	3	US FILTER CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1997	Pounds	34063	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery

METHANOL (TRI Chemical ID: 000067561)	1997	Pounds	30203	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
METHANOL (TRI Chemical ID: 000067561)	1997	Pounds	12113	CLEAN HARBORS SVCS. INC. 11800 S. STONY ISLAND AVE. CHICAGO, IL 60617	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1997	Pounds	1696	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1996	Pounds	61600	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1996	Pounds	1800	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1995	Pounds	104400	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1995	Pounds	1500	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Other Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1995	Pounds	40	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1994	Pounds	6300	ENSA OF INDIANA 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1994	Pounds	5500	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1994	Pounds	6300	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
METHANOL (TRI Chemical ID: 000067561)	1994	Pounds	2400	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment

METHANOL (TRI Chemical ID: 000067561)	1994	Pounds	250	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1994	Pounds	1800	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACK LICK, OH 43004	Other Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1994	Pounds	870	SAFETY-KLEEN CORP. 3700 LAGRANGE RD. SMITHFIELD, KY 40068	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1993	Pounds	87000	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1993	Pounds	3000	CHEMICAL WASTE MANAGEMENT-RMI 5371 COOK RD. MORROW, GA 30260	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1993	Pounds	5	TRADE WASTE INCINERATION #7 MOBILE AVE. SAUGET, IL 62201	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1993	Pounds	750	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1993	Pounds	650000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1993	Pounds	350000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
METHANOL (TRI Chemical ID: 000067561)	1993	Pounds	59000	PETRO CHEM PROCESSING 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1992	Pounds	3900	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Other Waste Treatment
METHANOL (TRI Chemical ID: 000067561)	1992	Pounds	130000	PETRO CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1992	Pounds	18000	INDUSTRIAL FULES & RESOURCES, INC. 640 S. SCOTT ST. S. BEND, IN 46625	Energy Recovery

METHANOL (TRI Chemical ID: 000067561)	1992	Pounds	1100	ROSS INCINERATION SERVICES INC 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1991	Pounds	47000	PETRO CHEMI PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1991	Pounds	12000	INDUSTRIAL FUELS & RESOURCES, INC. 640 S. SCOTT ST. SOUTH BEND, IN 46625	Energy Recovery
METHANOL (TRI Chemical ID: 000067561)	1991	Pounds	4900	ROSS INCINERATION SERVICES, INC. 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1991	Pounds	270	LAIDLAW ENVIRONMENTAL SERVICES, INC. TELFER SIDE RD. CORRUNNA LAMBTON,	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1990	Pounds	2900	LAIDLAW (SARNIA) LTD TELFER SIDE RD. CORUNNA,	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1990	Pounds	250	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACKLICK, OH 43004	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1989	Pounds	18000	CHEMICAL WASTE MANAGEMENT, EMELLE STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
METHANOL (TRI Chemical ID: 000067561)	1989	Pounds	250	LWD INC. HWY. 1523 CALVERT CITY, KY 42029	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1989	Pounds	250	TRICIL (SARNIA) LTD. TELFER SIDE RD. CORRUNNA,	Incineration/Thermal Treatment
METHANOL (TRI Chemical ID: 000067561)	1988	Pounds	11000	CHEMICAL WASTE MGMT., EMELLE FACILITY STATE HWY. 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment
METHANOL (TRI Chemical ID: 000067561)	1987	Pounds	93000	CHEMICAL WASTE MANAGEMENT, EMELLE FACILITY STATE HIGHWAY 17 EMELLE, AL 35459	Landfill/Disposal Surface Impoundment

METHANOL (TRI Chemical ID: 000067561)	1987	Pounds	27000	PETROCHEM PROCESSING, INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1999	Pounds	10	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Transfer to Waste Broker-Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1999	Pounds	10	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Waste Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1999	Pounds	70	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Transfer to Waste Broker-Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1999	Pounds	3	US FILTER CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1999	Pounds	12000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1999	Pounds	50	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Transfer to Waste Broker-Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1999	Pounds	110	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	10	CWM RESOURCE RECOVERY INC 4301 INFIRMARY ROAD WEST CARROLLTON, OH 45449	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	40	DANA CONTAINER INC 11430 RUSSELL STREET DETROIT, MI 48211	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	230	EVANS COLUMBUS 1385 BLATT BOULEVARD BLACKLICK, OH 43004	Other Waste Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	5	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Incineration/Thermal Treatment

METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	180	PETRO-CHEM PROCESSING INC 515 LYCASTE ST. DETROIT, MI 48214	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	6	US FILTER CORPORATION 1451 E. 9 MILE ROAD HAZEL PARK, MI 48030	Other Waste Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	29000	SOLVENT DISTILLERS, INC. 515 LYCASTE ST DETROIT, MI 48214	Solvents/Organics Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	130	CLEAN HARBORS SERVICES,INC. 11800 S. STONY ISLAND AVE CHICAGO, IL 60617	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	20	CYGNET AUTOMATED CLEANING, INC 45889 MAST STREET PLYMOUTH, MI 48170	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	10	ROSS ENVIRONMENTAL SERVICES 36790 GILES ROAD GRAFTON, OH 44044	Incineration/Thermal Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1997	Pounds	1	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1997	Pounds	90	COLUMBUS STEEL DRUM 1385 BLATT BLVD. COLUMBUS, OH 43004	Incineration/Thermal Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1997	Pounds	39900	PHILIP ENVIRONMENTAL SVCS. INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1997	Pounds	1	CLEAN HARBORS SVCS. INC. 11800 S. STONY ISLAND AVE. CHICAGO, IL 60617	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1995	Pounds	217000	PETROCHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
				PETROCHEM	

METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1995	Pounds	660000	PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1995	Pounds	500	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1995	Pounds	12000	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Insignificant Fuel Value
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1994	Pounds	27000	ENSA OF INDIANA 604 S. SCOTT ST. SOUTH BEND, IN 46624	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1994	Pounds	160000	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Transfer to Waste Broker-Waste Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1994	Pounds	6600	COLUMBUS STEEL DRUM 1385 BLATT BLVD. BLACK LICK, OH 43004	Other Waste Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1994	Pounds	60000	SAFETY-KLEEN CORP. 3700 LAGRANGE RD. SMITHFIELD, KY 40068	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1994	Pounds	6800	ROSS INCINERATION SERVICES 36790 GILES RD. GRAFTON, OH 44044	Incineration/Thermal Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1994	Pounds	440000	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Solvents/Organics Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1994	Pounds	250	ENSA OF INDIANA 604 S. SCOTT ST. SOUTH BEND, IN 46624	Transfer to Waste Broker-Waste Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1994	Pounds	380000	PETRO-CHEM PROCESSING INC. 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1993	Pounds	90000		

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: July 29, 2002 11:58 AM

This report may contain enforcement sensitive data.

Add check TRT

BASF CORP

MID007138746

Location: 3301 BOURKE AVE
DETROIT, MI 48238

Mailing: P.O. BOX 38009
DETROIT, MI 48238

County Name/Code: WAYNE/MI163

Universes Subjinsp: PCWrkId: ClosWrkId: PermC/PC:---S- PermWrkId: SubjCA: X CAWrkId:
LQG: X SQG: CESQG: Transporter: SNC: BOYSNC:

State District: Accessibility: Accepts Offsite: Non-Notifier:

CEI Evaluation 07/30/1992 Act Loc: MI By: C-EPA Seq #: 001 Person: R5AW Branch: RE Reason: Found Violation: Y
Notes:
Coverage Areas: DMR DOR GMR GOR

Violation Data									Enforcement Data
Act Loc	C L	P R	Type	Res Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	No Enforcements
MI	1		DOR	R5AW	RE	10/22/1992		11/19/1992	E0001	
MI	1		DMR	R5AW	RE	10/22/1992		11/19/1992	E0002	

CEI Evaluation 02/19/1991 Act Loc: MI By: C-State Seq #: 004 Person: Branch: Reason: Found Violation: Y
Notes:
Coverage Areas: GER GLB

Violation Data										Enforcement Data										
Act Loc	C L	P R	Type	Res Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per	Branch	Proposed Penalty	Final Penalty	Collected Amount
MI	1		GER			02/19/1991	04/05/1991	07/03/1991	B0003	MI	03/07/1991	120	003		S					
Viol. Notes:																				

CEI Evaluation 05/02/1989 Act Loc: MI By: C-State Seq #: 003 Person: Branch: Reason: Found Violation: N
Notes:
Coverage Areas: GER GLB

Violation Data	Enforcement Data
No Violations	No Enforcements

C2

This report may contain enforcement sensitive data.

BASF CORP, MID007138746, DETROIT, continued -

CEI Evaluation 07/23/1987 Act Loc: MI By: State Seq #: 002 Person: Branch: Reason: Found Violation: Y
Notes:
Coverage Areas: GER

Violation Data									Enforcement Data									
Act Loc	C L	P R	Type	Res Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per	Branch	Proposed Penalty	Final Penalty	Collected Amount
MI	1		GER			07/23/1987	08/28/1987	12/04/1987	S0002	MI	07/30/1987	120	002		S					
Viol. Notes:																				

CEI Evaluation 02/07/1985 Act Loc: MI By: State Seq #: 001 Person: Branch: Reason: Found Violation: Y
Notes:
Coverage Areas: GER

Violation Data									Enforcement Data									
Act Loc	C L	P R	Type	Res Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per	Branch	Proposed Penalty	Final Penalty	Collected Amount
MI	1		GOR			02/07/1985	03/08/1985	03/18/1985	S0001	MI	02/11/1985	120	001		S					
Viol. Notes:																				

HERMAN MILLER SPRING LAKE CAMPUS

MID981954241

Location: 18558 171ST AVE
SPRING LAKE, MI 49456

Mailing: 18558 171ST AVE
SPRING LAKE, MI 49456

County Name/Code: OTTAWA/MI139

Universes Subjinsp: PCWrkId: ClosWrkId: PermC/PC: PermWrkId: SubjCA: CAWrkId:
LQG: X SQG: CESQG: Transporter: SNC: BOYSNC:

State District: Accessibility: Accepts Offsite: Non-Notifier:

OTH Evaluation 08/13/1999 Act Loc: MI By: State Seq #: 005 Person: Branch: Reason: Found Violation: Y
Notes:
Coverage Areas: GMC

Violation Data									Enforcement Data									
Act Loc	C L	P R	Type	Res Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per	Branch	Proposed Penalty	Final Penalty	Collected Amount
MI	1		GMC			12/29/1998	01/30/1999	08/18/1999	S0005	MI	12/29/1998	120	004		S					
Viol. Notes:																				

MID 007 138 746

17 Copies — 1 to Each File

STATE OF MICHIGAN

JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

RUSSELL J. HARDING, Director

REPLY TO:

WASTE MANAGEMENT DIVISION
PO BOX 30241
LANSING MI 48909-7741

August 5, 1996

RECEIVED
AUG 08 1996
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Mr. Paul Little
Enforcement Program Section - HRE-8J
Region 5
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Little:

In response to a recent request from your office for information on several Michigan hazardous waste facilities, I offer the following:

None of the identified facilities have any Resource Conservation and Recovery Act (RCRA) enforcement action recently taken or about to be initiated. Any inspection to be completed at these facilities would be a result of them not being inspected previously or part of our Treatment, Storage, and Disposal Facility (TSDF) commitments. We have not identified any specific issues which would cause us to consider these facilities for special inspections. Specific comments on the facilities:

1. BASF - MID064197742 - 1609 Biddle Avenue, Wyandotte is a TSDF which has a very old Order in place (not a Waste Management Division Order) directing cleanup activities. This is part of an Environmental Response Division (ERD) Remedial Action Plan on which ERD has the lead. ← EPA has § 3008(h) AOC at NW, DEQ did RA at SW

2. BASF - MID001868538 - 5935 Milford Avenue, Detroit is a TSDF proceeding with closure of their RCRA unit.

3. BASF - MID007138746 - 3301 Bourke Avenue, Detroit is a TSDF which has been clean closed and is awaiting corrective action.

4. BASF - MID057007478 - 1200 Blaney Drive, Troy is a TSDF which has been clean closed and is awaiting corrective action.

5. BASF - Holland - BASF formerly owned two facilities in Holland. One facility was a research and development laboratory at 491 Columbia Avenue. The other facility, at 492 Douglas Avenue, was a full production plant. Both plants were involved in the development and manufacture of pigments, both in powder and in flushed forms. Effective July 1, 1996, BASF sold both of its Holland plants to Flint Ink Corporation. Approximately 50 percent of the former BASF employees were terminated as a result of the sale. Prior to the sale, there have been no state RCRA enforcement actions against either of these plants. We have no plans for an immediate inspection at the Douglas Avenue facility, although one will be conducted at some point in the future since it retains a generator status.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
HRE-8J

MAR 31 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. Stachowski
Plant Manager
BASF Corporation
3301 Bourke Avenue
Detroit, Michigan 48238

C.2.b

Re: Letter of Acknowledgement
BASF Corporation
EPA ID No.: MID 007 138 746

Dear Mr. Stachowski:

On October 22, 1992, the United States Environmental Protection Agency (U.S. EPA) issued BASF Corporation a Notice of Violation (NOV) which identified violations of 40 CFR Part 262. On November 19, 1992, U.S. EPA received your response to that NOV. This letter is to inform you that U.S. EPA has reviewed your response and determined that it is adequate to return your facility to compliance at this time.

Compliance with these regulations at this time does not limit the applicability of the other provisions of Resource Conservation and Recovery Act (RCRA) regulations. Your facility will continue to be evaluated by U.S. EPA in the future.

If you have any questions and/or concerns regarding this matter, please contact Allen Wojtas of my staff at (312) 886-6194.

Sincerely yours,

Joseph M. Boyle

Joseph M. Boyle, Chief
RCRA Enforcement Branch

cc: Dennis Drake, MDNR-Lansing

Printed on Recycled Paper

BASF

RECEIVED
NOV 19 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V.

November 11, 1992

Mr. Joseph M. Boyle, Chief
RCRA Enforcement Branch HRE-8J
Region 5
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Notice of Violation
BASF Corporation
MID 007 138 746

Dear Sir:

In response to the Notice of Violation dated October 22, 1992, to the above referenced facility, we have performed an investigation of the causes of the errors which led to the violations cited and we are reporting the following:

1. The inspection noted twenty-eight manifests for export shipments during 1990 and 1991, on which the waste description codes did not agree with those in the BASF Notifications of Intent to Export and the USEPA Acknowledgements of Consent for that period. Please be assured that the waste shipped under these manifests did not change; rather, additional waste codes were included on the manifests in attempts to more completely identify the wastes to the transporter and the disposal facility. Additionally, facility procedures designed to produce more consistent manifests for both domestic and export shipments inadvertently contributed to the discrepancies between the waste descriptions and codes entered on the manifests and those included on the copies of the USEPA Acknowledgements of Consent which were properly attached to the manifests. Our investigation revealed the following specific problems:

* The manifests for both domestic and export shipments were typically prepared in groups of ten documents at a time, with the blocks for dates and quantities left blank until each shipment was loaded and sent out for disposal. This procedure resulted in the use of manifests with waste descriptions and codes which were not changed to reflect the respective data in the BASF Notifications of Intent to Export and the USEPA Acknowledgements of Consent for the dates on which the shipments actually occurred.

* All twenty-eight manifests included the RCRA Waste Code F003 in the USDOT Description in Block 11. The F003 Waste Code was initially used at a time when a waste stream from one manufacturing process (which included an F003 spent solvent) was exported for disposal along with the solvent-contaminated waste water (which did not, and does not, include F003 spent solvent). The solvent-contaminated waste water was described in the BASF Notifications of Intent to Export and the USEPA

BASF Corporation
3301 Bourke Avenue, Detroit, Michigan 48238 (313) 861-1000

Acknowledgements of Consent. When manufacturing process changes resulted in the segregation of the F003 waste stream from the solvent-contaminated waste water, with the shipment of the F003 waste stream to a domestic disposal facility exclusively, the waste description on the manifests for export shipments should have been revised to reflect this change.

* Some manifests did not include the RCRA Waste Code D001 in Block I. This resulted from the continued use of manifests which had been prepared before the D001 Waste Code was included in the BASF Notification of Intent to Export dated October 4, 1989. Manifests used after August 9, 1990 on included the D001 Waste Code.

* With the adoption of TCLP Waste Codes, it became necessary to use RCRA Waste Code D035 to fully describe the solvent-contaminated waste water (one of the solvents was, and is, methyl ethyl ketone). This additional code was included in the BASF Notification of Intent to Export dated September 12, 1990. However, as noted above, the continued use of manifests prepared before the Notification of Intent to Export resulted in a group of manifests which did not include the D035 Waste Code.

* One group of manifests included handwritten notations of the D035 Waste Code. These were added by Shipping Department personnel to more fully identify the waste stream in accordance with the adoption of TCLP Waste Codes. However, these notations were made on some manifests used for shipments prior to the effective date in the USEPA Acknowledgement of Consent dated November 27, 1990.

* One group of manifests included typed notations of RCRA Waste Codes D035 and D018 in Block J. These codes were included to reflect two situations: the inclusion of the D035 Waste Code in the USEPA Acknowledgement of Consent dated November 27, 1990; and information received by the facility which identified the potential for a previously-unsuspected presence of benzene as an unintentional reaction product of certain raw materials used at the facility. It was judged possible that these raw materials could be present in the solvent-contaminated waste water. The use of the D018 Waste Code was included on the manifests as a precaution pending the resolution of the potential problem. The use of the suspect raw materials was discontinued at the facility, eliminating the possibility of the presence of regulated concentrations of benzene in the waste water.

2&3. Both of these citations refer to Michigan Manifest No. MI2164638. Although the waste shipped under this manifest met the description in the BASF Notification of Intent to Export, it was discovered not to conform to the "Code E" waste profile used by BASF and the disposal facility (the waste contained

nonhazardous solids which settled out of the waste water and were discovered at the disposal facility). When notified of this situation by the disposal facility, a new manifest was hurriedly typed out and the "Point of Exit" and "Conformance to Acknowledgement of Consent" were inadvertently omitted from Blocks 15 and 16 respectively.

We have taken the following steps to correct the above problems and prevent their recurrence:

1. The responsibility for filling out manifests shall be solely that of the Shipping Department Clerk. This individual will be responsible for verifying that the correct waste descriptions and codes are on all documents, and that this information is consistent with the current BASF Notification of Intent to Export and the USEPA Acknowledgement of Consent.

2. The standard manifest information shall be programmed into the Shipping Department Memorywriter (a typewriter with expanded memory capabilities) to ensure correct and consistent data entry on manifests. Shipping Department procedures shall be revised so that manifests will be produced individually when needed (not in groups). The Memorywriter will be programmed to include the proper USDOT Description and RCRA Waste Codes, and to print the "Point of Exit" and "Conformance to Acknowledgement of Consent" statements when the disposal facility is located outside the U.S.

3. Facility procedures shall be revised to ensure that any anticipated or suspected changes in export wastes are confirmed and communicated to USEPA; that, if necessary, the BASF Notification of Intent to Export is revised; and that the USEPA Acknowledgement of Consent is obtained before the waste is manifested and transported. The Shipping Department Clerk will be kept apprised of any such changes to ensure proper information is entered on the manifests, and that copies of the appropriate USEPA Acknowledgement of Consent are attached to the manifests.

4. Facility RCRA Training will be revised to ensure that those individuals responsible for aspects of the shipment of export wastes are completely aware of the revisions made to facility procedures to correct these violations.

We are confident that these actions are responsive to the items noted in the Notice of Violation. Please contact myself or Allen Kinsler, Ecology Coordinator, at 313-861-1000 if there are any questions or concerns.

Sincerely,

L. Stachowski

L. Stachowski
Plant Manager

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

BASF CORPORATION - BOURKE
DETROIT, MI
MID 007 138 746

FINAL REFERRAL PACKAGE

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05054
EPA Region	:	5
Site No.	:	MID 007 138 746
Date Prepared	:	October 6, 1992
Contract No.	:	68-W9-0006
Prepared by	:	PRC Environmental Management, Inc. (Mary Joyce Freibert)
Contractor Project Manager	:	Deb Harrity
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Allen Wojtas
Telephone No.	:	(312) 886-6194

contains recycled fiber and is recyclable

TABLE OF CONTENTS--REFERRAL PACKAGE

Part I	--	SUMMARY
Part II	--	COMPLIANCE EVALUATION INSPECTION CHECKLIST
Part III	--	SUPPORTING EVIDENCE

PART I
SUMMARY

SUMMARY

RELEVANT INFORMATION

Facility: BASF Corporation
3301 Bourke Avenue
Detroit, MI 48238

EPA ID No.: MID 007 138 746

Contact: Allen Kinsler

Phone No.: (313) 861-1000

Inspectors: Mary Joyce Freibert, PRC Lead Inspector
Gina L. Gulseth, PRC Inspector

Phone No.: 312/856-8700

PROJECT BACKGROUND

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05054 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9). This assignment calls for PRC to conduct compliance evaluation inspections (CEI) of treatment, storage, and disposal (TSD) facilities in Region 5 that import or export hazardous waste.

PRC conducted a CEI at the BASF Corporation (BASF-Bourke) facility in Detroit, Michigan, on July 30, 1992. This referral package briefly presents PRC's scope of work for the CEI and discusses potential violations identified during the inspection. The referral package contains three parts: Part I presents a summary of PRC's inspection; Part II contains the CEI checklist; and Part III provides supporting evidence for the CEI.

BASF-Bourke operations include manufacturing colorants and coatings. The facility currently generates solvent-contaminated wastewater (D001 and D035) and exports it to Laidlaw Environmental Services, Limited (Laidlaw) (formerly Tricil, Limited), in Corunna, Ontario (MIT 270 019 904). The facility ships solvent-contaminated wastewater about 96 times annually. In 1991, BASF-Bourke generated about 472,000 gallons of solvent-contaminated wastewater, all of which was exported to Laidlaw.

POTENTIAL VIOLATIONS

PRC inspected the BASF-Bourke facility on July 30, 1992. The inspection included records review and interviews with facility personnel. During the inspection, PRC noted potential violations of the Code of Federal Regulations (40 CFR). These potential violations are listed below.

1. **Potential Violation -- [40 CFR 262.53(c)].** The facility did not submit a renotification indicating a change to its original notification for exporting solvent-contaminated wastewater. For the years 1990 through 1992, the facility's notification of intent to export and EPA's Acknowledgement of Consent to export listed D001 and D035 waste codes. The facility's 1990 Annual Report listed only a D001 waste code, and its 1991 Annual Report listed D001 and D035 waste codes. For 1990, the facility listed an F003 waste code on six manifests. For September through November 1990, the facility listed D001, D035, and F003 waste codes on five manifests. For August through November 1990, the facility listed D001 and F003 waste codes on twelve manifests. For November 1991 through April 1992, the facility listed D001, D018, D035, and F003 waste codes on five manifests.

2. **Potential Violation -- [40 CFR 262.54(c)].** The facility did not specify the point of departure from the United States in the special handling instructions on manifest number MI 2164638, dated April 10, 1991.

3. **Potential Violation -- [40 CFR 262.54(d)].** The facility did not include the following phrase in item 16 of the manifest: "and conforms to the terms of the attached EPA Acknowledgement of Consent" on manifest number MI 2164638, dated April 10, 1991.

PART II
COMPLIANCE EVALUATION INSPECTION CHECKLIST

TSD-RCRA IMPORTER/EXPORTER INSPECTION REPORT

Name BASF Corporation EPA ID No. MID 007 138 746

Location Address: 3301 Bourke Avenue
Detroit, MI 48238

Mailing Address: 3301 Bourke Avenue
Detroit, MI 48238

Ownership: BASF Corporation County: Wayne

Contact: Allen Kinsler Telephone: (313) 861-1000

Facility Type: 2

1 = Importer
2 = Exporter
3 = Importer and Exporter

Person(s) Interviewed:	Title:	Telephone:
Allen Kinsler	Senior Project Engineer	(313) 861-1000

Inspectors:	Agency:	Telephone:
Mary Joyce Freibert	PRC Lead Inspector, EPA Contractor	(312) 856-8700
Gina L. Gulseth	PRC Inspector, EPA Contractor	(312) 856-8700

Date/Time of Inspection: 7/30/92 / 1:30 p.m.

GENERAL MANIFEST REQUIREMENTS

		OK	DF	NA
(A)	IMPORTER REQUIREMENTS:			
(1)	Has the importer of hazardous waste received a manifest OMB control number 2050-0039 on EPA Form 8700-22, and if necessary, EPA Form 8700-22A? 40 CFR 262.60(b) and 262.20(a)	_	_	X
	Does the manifest include the following:			
	(a) Name and address of the foreign generator, and the name, address, and EPA ID number of the importer? 40 CFR 262.60(b)(1)	_	_	X
	(b) Signatures of both the U.S. importer or his agent, and the initial transporter, and date on the certification? 40 CFR 262.60(b)(2)	_	_	X
(2)	Has the importer obtained the manifest form from the consignment state if the state supplied the manifest and required its use (Note: if the state did not supply the manifest form, then the manifest may be obtained from any source)? 40 CFR 262.60(c)	_	_	X
(B)	IMPORTER REQUIREMENTS:			
(1)	Has the Importer notified the Regional Administrator/MDNR Regional Director of receipt of hazardous waste from a foreign source? 40 CFR 264/265.12(a)	_	_	X
(2)	If so, was the notification in writing, and sent four weeks in advance of the date the waste was expected to arrive at the facility (Note: notice of subsequent shipments of the same waste is not required)? 40 CFR 264/265.12(a)	_	_	X
(C)	EXPORTER REQUIREMENTS:			
(1)	Has the exporter submitted a renotification, and obtained an EPA Acknowledgement of Consent, if any changes have been made to the original notification? 40 CFR 262.53(c)	_	X	_
(2)	Has the exporter submitted manifests as required in 40 CFR 262.20 through 262.23? 40 CFR 262.54	X	_	_
	Does the manifest contain the following information:			
	(a) Name and site address of the consignee? 40 CFR 262.54(a)	X	_	_

		OK	DF	NA
	(b) Name and site address of any alternate consignee? 40 CFR 262.54(b)	X	_	_
	(c) The point of departure from the United States identified in Special Handling Instructions? 40 CFR 262.54(c)	_	X	_
	(d) The following sentence in Item 16 of the Uniform Hazardous Waste manifest form: "and conforms to the terms of the attached EPA Acknowledgement of Consent"? 40 CFR 262.54(d)	_	X	_
(3)	Has the exporter obtained the manifest form from the exporter's State (Note: if the State does not supply the manifest, it can be obtained from any source)? 40 CFR 262.54(e)	X	_	_
(4)	Does the exporter have a signed copy of the manifest from the consignee confirming delivery? 40 CFR 262.54(f)	X	_	_
(5)	If a shipment could not be delivered to the designated or alternate consignee, did the exporter do the following:			
	(a) Renotify EPA of changes in the original notification, and obtain an EPA Acknowledgement of Consent prior to delivery?, or 40 CFR 262.54(g)(1)	_	_	X
	(b) Instruct the transporter to return the waste to the exporter or another facility in the United States?, and 40 CFR 262.54(g)(2)	_	_	X
	(c) Instruct the transporter to revise the manifest in accordance with exporter instructions? 40 CFR 262.54(g)(3)	_	_	X
(6)	Has the exporter received a copy of the EPA Acknowledgement of Consent (AOC) before shipment, and has the exporter shipped waste only within 12 months of receiving the AOC?	X	_	_
(7)	Has the exporter attached a copy of the EPA AOC to the manifest accompanying shipment? 40 CFR 262.54(h)	X	_	_
(8)	Has the exporter provided the transporter with an additional copy of the manifest for delivery to the U.S. Customs Official at the point the hazardous waste leaves the United States? 40 CFR 262.54(i)	X	_	_

RECORDKEEPING REQUIREMENTS:

		OK	DF	NA
(A)	IMPORTER REQUIREMENTS:			
(1)	Has the importer retained at the facility a copy of the manifest and shipping paper (if signed in lieu of the manifest at the time of delivery) for at least three years? 40 CFR 264/265.71(b)(5)	_	_	X
(B)	EXPORTER REQUIREMENTS:*			
(1)	Has the exporter kept a copy of each notification of intent to export for three years from the date waste was accepted by the initial transporter? 40 cFR 262.57(a)(1)	X	_	_
(2)	Has the exporter kept a copy of each EPA Acknowledgement of Consent for three years from the date waste was accepted by the initial transporter? 40 CFR 262.57(a)(2)	X	_	_
(3)	Has the exporter kept a copy of each Confirmation of Delivery for three years from the date waste was accepted by the initial transporter? 40 CFR 262.57(a)(3)	X	_	_
(4)	Has the exporter kept a copy of each annual report for three years from the date waste was accepted by the initial transporter? 40 CFR 262.57(a)(4)	X	_	_

*Note: The periods of records retention referred to in this section are extended automatically during the course of any unresolved enforcement action.

PART III

SUPPORTING EVIDENCE

- EPA ACKNOWLEDGEMENT OF CONSENT
- MANIFESTS LISTING F003 WASTE CODE
- MANIFESTS LISTING D001, D035, AND F003 WASTE CODES
- MANIFESTS LISTING D001 AND F003 WASTE CODES
- MANIFESTS LISTING D001, D018, D035, AND F003 WASTE CODES
- MANIFEST LACKING THE POINT OF DEPARTURE AND THE PHRASE "AND CONFORMS TO THE TERMS OF THE ATTACHED EPA ACKNOWLEDGEMENT OF CONSENT."
- PHOTOCOPIES OF FIELD LOGBOOK

EPA ACKNOWLEDGEMENT OF CONSENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 27, 1990

OFFICE OF
INTERNATIONAL ACTIVITIES

EPA Notice No.: 4/91

MR. ALLEN KINSLER
BASF CORPORATION
COATINGS & COLORANTS DIV.
3301 BOURKE AVENUE
DETROIT, MI 48238
EPA ID No.: MID007138746

Dear MR. KINSLER:

This is to acknowledge receipt of your notice, dated September 12, 1990, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste(s) as specified in your notice:

Waste Description: SOLVENT CONTAMINATED WASTE WATER. EPA Waste Code: D001,D035. DOT Shipping Name: RQ WASTE FLAMMABLE LIQUID, NOS (D001,D035); DOT Hazard Class: FLAMMABLE LIQUID; DOT I.D. No.: UN1993. Total Volume to be Exported: 325,000 GALLONS. Estimated Frequency: 65 loads per YEAR.

You may ship these wastes to the following consignee:

LAIDLAW ENVIRONMENTAL SERVICES
RR#1
CORUNNA, ONTARIO,
CANADA N0N 1G0
EPA ID No.: MIT270019904

Shipments may occur during the period from October 26, 1990 to October 26, 1991.

Please be advised that a copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste.

Printed on Recycled Paper

You are also reminded of the following special RCRA requirements for export shipments of hazardous waste. Specific details of these requirements are contained in Title 40 of the Code of Federal Regulations, Part 262, Subpart E.

1. The hazardous waste manifest for each shipment must show the point of exit of the shipment from the United States in Block 15 (40 CFR 262.54(c)). A statement that the shipment conforms to the EPA Acknowledgment of Consent must be added to Block 16 of the manifest (262.54(d)).

2. You must provide the waste transporter with a photocopy of the U.S. hazardous waste manifest accompanying the shipment. This copy of the manifest must be delivered to a U.S. Customs official at the point of departure from the United States (262.54(j)).

3. If the waste is returned to the United States, you must file an exception report with the EPA Office of International Activities (262.55).

4. If the major terms of the notice should change, renotification of EPA of these changes must be made (262.53(c)).

5. You must file an annual report with the EPA Office of International Activities by March 1 of each year summarizing all hazardous waste shipments exported during the previous calendar year. The report must include all items listed in 262.56.

All shipments of hazardous waste must conform to all applicable State and Federal hazardous waste regulations and transportation requirements as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Ms. Wendy Grieder, EPA Office of International Activities (Phone 202/382-4887) or to Mr. Jim Vincent, EPA National Enforcement Investigations Center (Phone 303/236-5120).

Sincerely,

Wendy Grieder

Wendy Grieder
International Activities Specialist

Oct. 5 '92 13:37 0000 BASF CORP. OEM DIV. TEL 1-313-861-1750 P. 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 18, 1991

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

EPA Notice No.: 444/91

MR. ALLEN KINSLER
BASF CORPORATION
COATINGS & COLORANTS DIV.
3301 BOURKE AVENUE
DETROIT, MI 48238
EPA ID No.: MID007138746

Dear MR. KINSLER:

This is to acknowledge receipt of your notice, dated September 26, 1991, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste(s) as specified in your notice:

Waste Description: SOLVENT CONTAMINATED WASTEWATER. EPA Waste Code: D001,D035. DOT Shipping Name: RQ WASTE FLAMMABLE LIQUID, NOS (D001,D035); DOT Hazard Class: FLAMMABLE LIQUID; DOT I.D. No.: UN1993. Total Volume to be Exported: 500,000 GALLONS. Estimated Frequency: 100 loads per YEAR.

You may ship these wastes to the following consignee:

TRICIL (SARNIA) LIMITED
RR #1
CORUNNA, ONTARIO
CANADA N0N 1G0
EPA ID No.: MIT270019904

Shipments may occur during the period from October 18, 1991 to October 18, 1992.

Please be advised that a copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste.

Printed on Recycled Paper

You are also reminded of the following special RCRA requirements for export shipments of hazardous waste. Specific details of these requirements are contained in Title 40 of the Code of Federal Regulations, Part 262, Subpart E.

1. The hazardous waste manifest for each shipment must show the point of exit of the shipment from the United States in Block 15 (40 CFR 262.54(c)). A statement that the shipment conforms to the EPA Acknowledgment of Consent must be added to Block 16 of the manifest (262.54(d)).

2. You must provide the waste transporter with a photocopy of the U.S. hazardous waste manifest accompanying the shipment. This copy of the manifest must be delivered to a U.S. Customs official at the point of departure from the United States (262.54(j)).

3. If the waste is returned to the United States, you must file an exception report with the EPA Office of International Activities (262.55).

4. If the major terms of the notice should change, renotification of EPA of these changes must be made (262.53(c)).

5. You must file an annual report with the EPA Office of International Activities by March 1 of each year summarizing all hazardous waste shipments exported during the previous calendar year. The report must include all items listed in 262.56.

All shipments of hazardous waste must conform to all applicable State and Federal hazardous waste regulations and transportation requirements as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Mr. Mickey Post, EPA Office of Waste Programs Enforcement (Phone 202/260-8732) or to Mr. Jim Vincent, EPA National Enforcement Investigations Center (Phone 303/236-5120).

Sincerely,

Mary Jean Osborne

Mary Jean Osborne
Chief, PAC Section
RCRA Enforcement Division

cc: Jim Vincent, EPA/NEIC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 20, 1992

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

EPA Notice No.: 444/91R

MR. ALLEN KINSLER
BASF CORPORATION
COATINGS & COLORANTS DIV.
3301 BOURKE AVENUE
DETROIT, MI 48238
EPA ID No.: MID007138746

Dear MR. KINSLER:

This is to acknowledge receipt of your notices, dated September 26, 1991 and February 19, 1992, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your revised notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes a revised EPA Acknowledgment of Consent for the export of the following hazardous waste(s) as specified in your notices:

Waste Description: SOLVENT CONTAMINATED WASTEWATER. EPA Waste Code: D001,D035. DOT Shipping Name: WASTE FLAMMABLE LIQUID, NOS; DOT Hazard Class: FLAMMABLE LIQUID; DOT I.D. No.: UN1993. Total Volume to be Exported: 740,000 GALLONS. Estimated Frequency: 148 loads per YEAR.

You may ship these wastes to the following consignee:

LAIDLAW ENVIRONMENTAL SERVICES (SARNIA)
RR#1
CORUNNA, ONTARIO
CANADA N0N 1G0
EPA ID No.: MIT270019904

Printed on Recycled Paper

Shipments may occur during the period from October 18, 1991 to October 18, 1992.

You are also reminded of the following special RCRA requirements for export shipments of hazardous waste. Specific details of these requirements are contained in Title 40 of the Code of Federal Regulations, Part 262, Subpart E.

1. If the major terms of the original notice of intent to export on which this consent is based should change, you must renotify EPA. Please send your renotification to: EPA, Office of Waste Programs Enforcement, RCRA Enforcement Division (OS-520), 401 M Street, S.W., Washington, D.C. 20460, with "ATTENTION: NOTIFICATION TO EXPORT" prominently displayed on the front of the envelope. (262.53(c))

2. The Uniform Hazardous Waste Manifest Form for each shipment must identify the point of departure from the United States in Item 15, Special Handling Instructions. (262.54(c))

3. The following statement must be added to the end of the first sentence of the certification set forth in Item 16 of the Uniform Hazardous Waste Manifest Form: "and conforms to the terms of the attached EPA Acknowledgment of Consent". (262.54(d))

4. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (262.54(h))

5. You must provide the waste transporter with an additional copy of the U.S. hazardous waste manifest accompanying the shipment for delivery to a U.S. Customs official at the point the hazardous waste leaves the United States in accordance with 263.20(g)(4). (262.54(i)).

6. You must file an exception report with the EPA, Office of Waste Programs Enforcement, RCRA Enforcement Division (OS-520), 401 M Street, S.W., Washington, DC 20460, Attn: NOTIFICATION TO EXPORT, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee that the hazardous waste was received; or if the waste is returned to the United States. (262.55).

7. You must file an annual report by March 1 of each year with the EPA, Office of Waste Programs Enforcement, RCRA Enforcement Division (OS-520), 401 M Street, S.W., Washington, DC 20460, Attn: NOTIFICATION TO EXPORT, summarizing all hazardous waste shipments exported during the previous calendar year. The report must include all items listed in 262.56.

All shipments of hazardous waste must conform to all applicable State and Federal hazardous waste regulations and transportation requirements as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Ms. Lisa Warner, EPA Office of Waste Programs Enforcement (Phone 202/260-9316) or to Mr. Jim Vincent, EPA National Enforcement Investigations Center (Phone 303/236-5120).

Sincerely

Mary Jean Osborne

Mary Jean Osborne, Chief
Program Analysis and Coordination Section
RCRA Enforcement Division (OS-520)

cc: Jim Vincent, EPA/NEIC

MANIFESTS LISTING F003 WASTE CODE

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID 0 0 7 138 7 46 — Manifest Document No. 0 B 331 — 2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

4. Generator's Phone (313) 861-1000

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT 27 0 0 1 99 0 4

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

9. Designated Facility Name and Site Address
Tricil (Sarnia) LTD
R.R. #1 Tel Per Side Rd.
Corunna, Ontario NON 1GO
10. US EPA ID Number: MIT 270 01 99 0 4

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	T T	36650	P
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above — Handling Codes for Wastes Listed Above
[illegible]
a/ [illegible]
b/ [illegible]
c/ [illegible]
d/ [illegible]

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the attached E.R.A. Acknowledgement of Consent.
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: Michael B. Kokoszka — Signature: [signature] — Date: Month Day Year: 02 [illegible] 10

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [signature] — Signature: [signature] — Date: Month Day Year: [illegible]

18. Transporter 2 Acknowledgement or 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] — Signature: [signature] — Date: Month Day Year:

GENERATOR — TRANSPORTER — FACILITY

PILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4708 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/86)

GENERATOR 2nd COPY

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID 0 0 7 138 7 46
Manifest Document No.: 0 B 32[illegible]
2. Page 1 of 1

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

3. Generator's Name and Mailing Address: BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

4. Generator's Phone (313) 861-1000

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT 27 0 01 9 9 04

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

9. Designated Facility Name and Site Address: Tricil (Sarnia) LTD
R.R. #1 Tel Ser Side Rd.
Corunna, Ontario NON 1GO
10. US EPA ID Number: MIT 27 0 01 9 9 04

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	T T	[illegible]	P
b.						
c.						
d.						

J. [illegible] Description [illegible] Listed Above
[illegible]

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

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, Date of Exit

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 conforms to the conditions of the attached E.R.A. Acknowledgement of Consent.
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: Michael B. Kokoszka
Signature:
Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian Cooper
Signature: [signature]
Date: Month Day Year

18. Transporter 2 Acknowledgement or 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: [illegible]
Signature: [signature]
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE ER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/86)

Rev. 3/86

GENERATOR 2nd COPY

DNR

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID 0 0 7 1 3 8 7 4 6

Manifest Document No. 0 8 3 2 7

2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

4. Generator's Phone (313) 861-1000

5. Transporter 1 Company Name
Tricil (Sarnia) LTD

6. US EPA ID Number
MIT 2 7 0 0 1 9 9 0

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
Tricil (Sarnia) LTd
R.R. #1 Tel Fer Side Rd.
Corunna, Ontario NON 1GO

10. US EPA ID Number
MIT 2 7 0 0 1 9 9 0

GENERATOR

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	"X" R.Q. Waste Flammable Liquid N.O.S. (F003) Flammable Liquid UN-1993	0 01	TT	[illegible]	P
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above — K. Handling Codes for Wastes Listed Above

b/

c/

d/

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the att
E.P.A. Acknowledgement of Consent.
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: Michael B. Kokoszka — Signature — Date (Month Day Year)

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date (Month Day Year)

18. Transporter 2 Acknowledgement or 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)

EPA Form 8700-22 (Rev. 9/86)

GENERATOR 2nd COPY

PILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE
ER AT 1-800-424-8802 24 HOURS PER DAY.

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 16 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID 0 0 7 138 7 46 — Manifest Document No. 0 8 3 29 — 2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

4. Generator's Phone (313 861-1000

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT 27 0 0 1 9 9 04

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

9. Designated Facility Name and Site Address
Tricil (Sarnia) LTD
R.R. #1 Tel Fer Side Rd.
Corunna, Ontario NON 1GO
10. US EPA ID Number: MIT 27 0 0 1 9 9 0

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	X	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	T T	45820	P
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above — Handling Codes for Wastes a/ / b/ / c/ / d/ /

[illegible]

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the attached E.R.A. Acknowledgement of Consent.

If a large quantity generator, I certify that I have in place to be a program 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: Michael B. Kokoszka — Signature: [signature] — Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date: Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials
Printed/Typed Name — Signature: [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

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE ER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/86)

PR 5110 Rev. 9/86

GENERATOR 2nd COPY

DNR

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

...as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID 0 0 7 1 3 8 7 4 6

Manifest Document No. 0 B 3 3 0

2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

4. Generator's Phone (313) 861-1000

5. Transporter 1 Company Name: Tricil (Sarnia) LTD

6. US EPA ID Number: MIT 2 7 0 0 1 9 9 0

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
Tricil (Sarnia) LTD
R.R. #1 Tel Fer Side Rd.
Corunna, Ontario NON 1G0

10. US EPA ID Number: MIT 27 0 0 01 9 9 0

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM	11. US DOT Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	"X"	R.Q. Waste Flammable Liquid NOS (P003) Flammable Liquid UN-1993	001	DT	15000	P
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above

Hazardous Waste Code "R"

K. Handling Codes for Wastes Listed Above

1. 001 P
2. 001 P
3. 001 P

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the attached E.P.A. Acknowledgement of Consent.

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: Michael B. Kokoszka | Signature | Date (Month Day Year)

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year) 0 7 2 2 9 0

18. Transporter 2 Acknowledgement or 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

...IL SPI... ...JST BE... ...RTED ... MIC... POLLU... EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE ...TER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/86)

PR 5110 Rev. 9-88

GENERATOR 2nd COPY

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID 0 0 7 138 7 46
Manifest Document No.: 0 B 326
2. Page 1 of 1

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

3. Generator's Name and Mailing Address: BASF Corporation, 3301 Bourke Ave., Detroit, MI 48238

4. Generator's Phone (313) 861-1000

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT 27 0 0 1 9 9 0 4

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

9. Designated Facility Name and Site Address: Tricil (Sarnia) LTD, R.R. #1 Tel Fer Side Rd., Corunna, Ontario NON 1GO
10. US EPA ID Number: MIT 27 0 0 0 1 9 9 0

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	TT	[illegible]	P
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above: [illegible]

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

15. Special Handling Instructions and Additional Information

Point of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the atta

E.R.A. Acknowledgement of Consent.

If I am a large quantity generator, 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: Michael B. Kokoszka
Signature: Michael Kokoszka
Date: Month Day Year: 08 00 90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible]
Signature:
Date: Month Day Year:

18. Transporter 2 Acknowledgement or 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: RP
Signature: [illegible]
Date: Month Day Year: 9 4 0 7 90

GENERATOR

TRANSPORTER

FACILITY

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE ER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/86)

PR 5112 Rev. 9/86

GENERATOR 2nd COPY

MANIFESTS LISTING D001, D035, AND F003 WASTE CODES

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID007138746 Manifest Document No. 06356

2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF Corporation
1201 Bourke Ave.
Detroit, MI 48238

A. State Manifest Document Number MI 2164520

B. State Generator's ID

4. Generator's Phone (313 861-1000

5. Transporter 1 Company Name
Tricil (Sarnia) LTD

6. US EPA ID Number
ONT270019904

C. State Transporter's ID

D. Transporter's Phone

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
Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Telfer Side Rd.
Corunna, Ontario N0N 1G0

10. US EPA ID Number
ONT270019904

G. State Facility's ID

H. Facility's Phone (519) 864-1

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a. "X" R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993		001	TT		P	D001 F003	
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Microgel Waste Water Code "X"

K. Handling Codes for Wastes Listed Above
a. 1
b. 1
c. 1
d. 1

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit

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 conform to the conditions of the attached E.P.A. Acknowledge of Consent.
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: Michael B. Kokosza
Signature
Date: Month Day Year 11 1 1 1 1 1 1

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Chas R Shipps
Signature
Date: Month Day Year 1 1 1 5 1 1

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

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 4/90

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, PA 1979, as amended and Act 136, PA 1969

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, PA 1969

Please print or type

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID 0 0 7 138 7 46
Manifest Document No.: 0 B 3 40
2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address:
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

A. State Manifest Document Number: MI 2025465

4. Generator's Phone: (313) 861-1000

B. State Generator's ID:

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT 27 0 01 9 9 0 4

C. State Transporter's ID:

D. Transporter's Phone: (519) 864-1021

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:
Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Tel Per Side Rd.
Corunna, Ontario N0W 1G0

10. US EPA ID Number: M IT 27 0 0 1 9 9 0

G. State Facility's ID:

H. Facility's Phone: (519) 864-1021

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM		12 Containers No.	Type	13 Total Quantity	14 Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	T T	41040	P	D [illegible]	"E"
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above:
Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information:
Point of Exit from U.S. Port Huron, MI Date of Exit

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.

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 conforms to the conditions of the attached E.P.A. Acknowledge of Consent.

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: Michael B. Kokoszka
Signature: Michael B Kokoszka
Date: Month Day Year: 09 27 90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [illegible]
Date: Month Day Year: 09 27 90

18. Transporter 2 Acknowledgement or 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: Kelly Adamson
Signature: [illegible]
Date: Month Day Year: 09 27 90

EPA Form 8700-22 (Rev. 9 88)

PR 5110 Rev 9 88

GENERATOR 2nd COPY

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, PA 1979 as amended and Act 136, PA 1969

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, PA 1969.

Please print or type

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID 0 0 7 138 7 46
Manifest Document No.: O 8 348
2. Page 1 of 1

Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address:
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

A. State Manifest Document Number: MI 2025467

4. Generator's Phone: (313) 861-1000

B. State Generator's ID:

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: M I T 27 0 0 1 9 9 0 4

C. State Transporter's ID:
D. Transporter's Phone: (519) 864-1021

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:
~~Tricil (Sarnia) LTD~~ (Laidlaw) Environmental Services
R.R. #1 Tel Per Side Rd.
Corunna, Ontario N0N 1G0

10. US EPA ID Number: M I T 27 0 0 1 9 9 0 4

G. State Facility's ID:
H. Facility's Phone: (519) 864-1021

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	T T	[illegible]		P [illegible]	"X"
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above:
Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information:
Port of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the attached E.P.A. Acknowledge of Consent.
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: Michael B. Kokoszka
Signature: Michael B. Kokoszka
Date: Month Day Year: 10 11 90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [illegible]
Date: Month Day Year: 10 11 90

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:

EPA Form 8700-22 (Rev. 9/88)

PR 5110
Rev. 9/88

GENERATOR 2nd COPY

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969

Please print or type.

Form Approved. OMB No. 2060-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID 0 0 7 138 7 46
Manifest Document No.: G B 351
2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address:
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

A. State Manifest Document Number: MI 2025470

4. Generator's Phone (313) 861-1000

B. State Generator's ID

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: M IT 27 0 0 1 9 9 0

C. State Transporter's ID

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

D. Transporter's Phone (519) 864-1021

E. State Transporter's ID

9. Designated Facility Name and Site Address:
Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Tel Per Side Rd.
Corunna, Ontario N0N 1G0

10. US EPA ID Number: MI T 27 0 0 19 9 04

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone (519) 864-1021

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	T T		P	D 001	"H"
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above
Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit

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.
E.P.A. Acknowledge of Consent. and conforms to the conditions of the attached
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: Michael B. Kokoszka
Signature
Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18. Transporter 2 Acknowledgement or 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

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE ... AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110
Rev. 9-88

GENERATOR 1st COPY

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MIT 8 0 7 138 7 46
Manifest Document No. 0 0 3 3 4 5
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
BASF Corporation 08 347
3381 Bourns Ave.
Detroit, MI 48238

4. Generator's Phone (313 861-1000

A. State Manifest Document Number MI 2025466
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone (519) 864-1021
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone (519) 864-1021

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT 27 0 0 18 9 0 4

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

9. Designated Facility Name and Site Address
Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Tel Par Side Rd.
Corunna, Ontario N0N 1G0
10. US EPA ID Number: MIT 27 0 0 1 9 9 0

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X" R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	001	49			D035	
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Microgel Waste Water Code "B"

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

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit

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.
E.P.A. Acknowledgement of Consent and conforms to the conditions of the attached
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: Michael R. Kokowski
Signature: [signature]
Date: Month Day Year 10 04 10

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MIKE A. LAZARCHUK
Signature: [signature]
Date: Month Day Year 10 04 10

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

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 9.88

GENERATOR 1st COPY

MANIFESTS LISTING D001 AND F003 WASTE CODES

DNR

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969

Please print or type

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID 00 7 138 7 46

Manifest Document No. 08 342

2. Page 1 of 1

Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

A. State Manifest Document Number MI 2025461

4. Generator's Phone ( ) 313 861-1000

B. State Generator's ID

5. Transporter 1 Company Name Tricil (Sarnia) LTD

6. US EPA ID Number MIT 27 0 0 1 9 0 4

C. State Transporter's ID

D. Transporter's Phone (519) 864-102

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
Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Tel Per Side Rd.
Corunna, Ontario NOW 1G0

10. US EPA ID Number MIT 27 0 0 1 9 0 4

G. State Facility's ID

H. Facility's Phone (519) 864-1021

	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.	N/H
a.	"X" R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	TT		P	D 001	"H"
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Microgel Waste Water Code "g"

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

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the attached E.P.A. Acknowledge of Consent.

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: Michael B. Kokoszka | Signature | Date: Month Day Year 0 2 2 1 1 0

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Robert H Fossell | Signature | Date: Month Day Year 0 2 2 1 1 0

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

PILLS BE RE ... 3 TO 1 ... AT 1-800-424-8802 24 HOURS PER DAY.

... GENC... ...TING ... IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev 9 88

DNR

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

Form Approved. OMB No. 2060-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID007137746 Manifest Document No. 08343

2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

4. Generator's Phone (313) 861-1000

5. Transporter 1 Company Name
Tricil (Sarnia) LTD

6. US EPA ID Number MIT270019904

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Tel Pur Side Rd.
Corunna, Ontario N0N 1G0

10. US EPA ID Number MIT270019904

A. State Manifest Document Number MI 2025462

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone (519) 864-1821

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone (519) 864-1821

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X" R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	001	TT	[illegible]	P	D001	"X"
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the attached

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: MICHAEL A. LOVOSTA — Signature: [signature] — Date: Month 01 Day 10 Year 90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MARK A. LADEBURG — Signature: [signature] — Date: Month [illegible] Day [illegible] Year [illegible]

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: KEVIN ADAMSON — Signature: [signature] — Date: Month 01 Day 31 Year 90

GENERATOR — TRANSPORTER — FACILITY

SPILL ... MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE ... AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 9 88

GENERATOR

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

Please print or type

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.
Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID 0 0 7 138 7 46
Manifest Document No.: O B 344
2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address: BASF Corporation, 3301 Bourke Ave., Detroit, MI 48238

A. State Manifest Document Number: MI 2025463

4. Generator's Phone: 313 861-1000

B. State Generator's ID:

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MI T 27 0 0 19 9 0 4

C. State Transporter's ID:

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

D. Transporter's Phone: (519) 864-102

E. State Transporter's ID:

9. Designated Facility Name and Site Address: Tricil (Sarnia) LTD (Laidlaw), R.R. #1 Tel Fer Side Rd., Corunna, Ontario N0W 1G0
10. US EPA ID Number: MIT 27 0 0 19 9 0 4

F. Transporter's Phone:

G. State Facility's ID:

H. Facility's Phone: (519) 864-1021

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 0	1 T T	4 1 5	P	D 0 0 1	"H"
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above: Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information: Point of Exit from U.S. Port Huron, MI Date of Exit

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.

E.P.A. Acknowledge of Consent and conforms to the conditions of the attached

Printed/Typed Name: Michael B. Kokoszka
Signature: Michael B. Kokoszka
Date: Month Day Year: 09 13 90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [illegible]
Date: Month Day Year: 09 13 90

18. Transporter 2 Acknowledgement or 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

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 2nd COPY

PR 5110
Rev 9 88

IF SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, PA 1979, as amended and Act 136, PA 1969.
Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, PA 1969.

Please print or type

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MIT 0 0 7 1 3 8 7 4 6
Manifest Document No.: 0 B 3 4 5
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

A. State Manifest Document Number: MI 2025464
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone:
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: (519) 864-1021

4. Generator's Phone: 313 861-1000
5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT 27 0 0 1 9 9 0 4
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address:
Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Tel Fer Side Rd.
Corunna, Ontario N0N 1G0
10. US EPA ID Number: MIT 27 0 0 1 9 9 0 4

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	001	TT	49400	P	D001	"H"
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above:
Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information:
Point of Exit from U.S. Port Huron, MI Date of Exit

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.
R.P.A. Acknowledge of Consent, and conforms to the conditions of the attached
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: Michael B. Kokoszka
Signature: Michael B. Kokoszka
Date: Month Day Year: 09 20 90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Fred Rotstein
Signature:
Date: Month Day Year: 09 20 90

18. Transporter 2 Acknowledgement or 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: Kevin Adamson
Signature:
Date: Month Day Year: 09 20 90

GENERATOR / TRANSPORTER / FACILITY

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 9/88

GENERATOR 2nd COPY

Required under authority of Act 64, PA 1979, as amended and Act 136, PA 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, PA 1969.

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID 0 0 7 138 7 46 — Manifest Document No. O B 349

2. Page 1 of 1

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

3. Generator's Name and Mailing Address: BASF Corporation, 3301 Bourke Ave., Detroit, MI4 8238

4. Generator's Phone (313) 861-1000

A. State Manifest Document Number: MI 2025468

B. State Generator's ID

5. Transporter 1 Company Name: Tricil (Sarnia) LTD

6. US EPA ID Number: MIT 27 0 019 9 0 4

C. State Transporter's ID

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (519) 864-10

E. State Transporter's ID

9. Designated Facility Name and Site Address: ~~Tricil (Sarnia) LTD~~ (Laidlaw) Env. Ser. Canning Ltd. R.R. #1 Tel Fer Side Rd. Corunna, Ontario N0N 1G0

10. US EPA ID Number: M I T 27 0 0 19 9 0

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone (519) 864-1021

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	T T		P	D 001	"E"
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above: Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information: Point of Exit from U.S. Port Huron, MI Date of Exit

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.

E.P.A. Acknowledge of Consent, and conform to the conditions of the attached

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: Michael B. Kokoszka — Signature — Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name — Signature — Date: Month Day Year

18. Transporter 2 Acknowledgement or 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

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1 800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE ER AT 1 800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev 9/88

GENERATOR 2nd COPY

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1979, as amended and Act 136, PA 1969

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, PA 1969

Please print or type

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID 0 0 7 138 7 46
Manifest Document No.: O B 35 0
2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address: BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238
4. Generator's Phone (313 861-1000

A. State Manifest Document Number: MI 2025469
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: (519) 864-1021
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: (519) 864-1021

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT 27 0 019 9 0 4
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address: Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Tel Per Side Rd.
Corunna, Ontario N0N 1G0
10. US EPA ID Number: MIT 27 0 019 9 0 4

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a. "X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	0 01	T T		P	D 001	"H"
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above: Microgal Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information: Point of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the attached E.P.A. Acknowledge of Consent.

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: Michael B. Kokoszka
Signature:
Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible]
Signature:
Date: Month Day Year

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: [illegible] Sullivan
Signature:
Date: Month Day Year

GENERATOR / TRANSPORTER / FACILITY

ILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE R AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)
PR 5110 Rev. 9/88

GENERATOR 2nd COPY

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required pursuant to Act 136, P.A. 1979, as amended [illegible] 1986.
Failure to file is punishable under section 299.548, MCL or Section [illegible] Act 136, P.A. 1986.

Please print or type.

Form Approved. OMB No. 2060-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID071387400 Manifest Document No. 08357
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: BASF Corporation, 3301 Bourke Ave., Detroit, MI 48238
4. Generator's Phone (313) 861-1000
5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT270819900
7. Transporter 2 Company Name
8. US EPA ID Number
9. Designated Facility Name and Site Address: Tricil (Sarnia) LTD (Laidlaw), R.R. #1 Telfer Side Rd., Corunna, Ontario N0N 1G0
10. US EPA ID Number: MIT270619900

A. State Manifest Document Number: MI 216452
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone (313) 866-1102
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone (519) 864-1[illegible]

GENERATOR

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a. "X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	001	TT	[illegible]	P	F003	N
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above: Microgel Waste Water Code "B"

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

15. Special Handling Instructions and Additional Information: Point of Exit from U.S. Port Huron, MI Date of Exit:

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 according to applicable international and national government regulations. and conforms to the conditions of the attached E.P.A. Acknowledge of Consent.
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: Michael B. Kobeszka | Signature | Date: Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Paul Ross | Signature | Date: Month Day Year 1/10/90

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

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 4/90

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID007138746 Manifest Document No. 08355
2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

A. State Manifest Document Number MI 2164519

4. Generator's Phone (313 861-1000

B. State Generator's ID

5. Transporter 1 Company Name
Tricil (Sarnia) LTD

6. US EPA ID Number MIT270019904

C. State Transporter's ID

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (519) 864-1

E. State Transporter's ID

9. Designated Facility Name and Site Address
Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Telfer Side Rd.
Corunna, Ontario N0N 1G0

10. US EPA ID Number MIT270019904

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone (519) 864-1021

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	001	T	[illegible]	P	D 001	H
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above
Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI Date of Exit _____

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 conforms to the conditions of the attached E.P.A. Acknowledge of Consent.
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: Michael B. Kokoszka
Signature:
Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [illegible]
Date: Month Day Year

18. Transporter 2 Acknowledgement or 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

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE ER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 4/90

GENERATOR 1st COPY

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under Act 64, P.A. 1979, as amended and Act 136, P.A. 1988

Failure to file is punishable under section 20(1)(b) of Act 64 or Section 10 of Act 136, P.A. 1988

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID007138746
Manifest Document No. 08352
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
BASF Corporation
3301 Beaubie Ave.
Detroit, MI 48238

4. Generator's Phone (313) 861-1000

5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT270199044

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

9. Designated Facility Name and Site Address
Tricil (Sarnia) LTD (Laidlaw)
R.R. #1 Telfer Side Rd.
Corunna, Ontario NON 1GO
10. US EPA ID Number: MIT270199044

A. State Manifest Document Number: MI 2164516
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone (519) 864-10
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone (519) 864-1021

GENERATOR

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X" R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	001	TT		P	D001	H
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information
Point of exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the atta
E.P.A. Acknowledge of Consent.
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: Michael B. Kokoszka
Signature
Date: Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

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

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 4/90

GENERATOR'S COPY

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS BOX
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.
Failure to file is punishable under section 29 of MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

Form Approved. OMB No. 2060-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID007138746 Manifest Document No. 08351
2. Page 1 of 1

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

3. Generator's Name and Mailing Address: BASF Corporation, 3301 Bourke Ave., Detroit, MI 48238
4. Generator's Phone (313) 861-1000
5. Transporter 1 Company Name: Tricil (Sarnia) LTD
6. US EPA ID Number: MIT270019904
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address: Tricil (Sarnia) LTD (Laidlaw), R.R. #1 Telfer Side Rd., Corunna, Ontario N0W 1G0
10. US EPA ID Number: MIT270019904

A. State Manifest Document Number: MI 2164517
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: (519) 864-102
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: [illegible]

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	R.Q. Waste Flammable Liquid NOS (F003) Flammable Liquid UN-1993	001	TT		P	001	H
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above: Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information: Point of Exit from U.S. Port Huron, MI Date of Exit

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 conforms to the conditions of the attached R.R.A. Acknowledge of Consent

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: Michael B. Kolesza | Signature: | Date: Month Day Year: [illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: | Signature: | Date: Month Day Year: [illegible]

18. Transporter 2 Acknowledgement or 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

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CLEARING AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 4/90

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 138, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or section 10 of Act 138, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID007138746
Manifest Document No.: 08354
2. Page 1 of 1

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

3. Generator's Name and Mailing Address: BASF Corporation, 3301 Bourke Ave., Detroit, MI 48238

4. Generator's Phone (313) 861-1000

A. State Manifest Document Number: MI 2164518

B. State Generator's ID:

5. Transporter 1 Company Name: Tricil (Sarnia) LTD

6. US EPA ID Number: MIT270019904

C. State Transporter's ID:

D. Transporter's Phone: (519) 864-1021

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: Tricil (Sarnia) LTD (Laidlaw), R.R. #1 Telfer Side Rd., Corunna, Ontario N0N 1G0

10. US EPA ID Number: MIT270019904

G. State Facility's ID:

H. Facility's Phone: (519) 864-1021

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	R.Q. Waste Flammable Liquid N.O.S. (F003) Flammable Liquid UN-1993	001	TT		P	[illegible]	N
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above: Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information: Point of Exit from U.S. Port Huron, MI Date of Exit _____

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 conforms to the conditions of the attached E.P.A. Acknowledge of Consent.

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: Michael B. Kokoszka | Signature: | Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

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

18. Transporter 2 Acknowledgement or 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

SPILL ... BE R... ED TO ... CHIG... ...LUTIC... ...RGENC... ...ERTING ST... ...M, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE ... AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 4/90

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID007138746 Manifest Document No. 08355

2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF Corporation
3301 Bourke Ave.
Detroit, MI 48238

4. Generator's Phone (313 861-1000

A. State Manifest Document Number MI 2164544

B. State Generator's ID

5. Transporter 1 Company Name
Tricil (Sarnia) LTD. (Laidlaw)

6. US EPA ID Number MIT270019904

C. State Transporter's ID

D. Transporter's Phone (519) 864-1[illegible]2

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
Tricil (Sarnia) LTD (Laidlaw
R.R. #1 Telfer Side Rd.
Corunna, Ontario N0N 1G0

10. US EPA ID Number MIT270019904

G. State Facility's ID

H. Facility's Phone (519) 864-1[illegible]

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a. "X"	R.Q. Waste Flammable Liquid NOS (f003) Flammable Liquid UN-1993	001	T	[illegible]	P	D001	"H"
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Microgel Waste Water Code "E"

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

15. Special Handling Instructions and Additional Information
Point of Exit from U.S. Port Huron, MI. Date of Exit

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 conforms to the conditions of the attached E.P.A. Acknowledge of Consent.
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: Michael B. Kokoszka
Signature
Date: Month Day Year [illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year [illegible]

18. Transporter 2 Acknowledgement or 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

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110
Rev. 4/90

MANIFESTS LISTING D001, D018, D035, AND F003 WASTE CODES

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID007138746 Manifest Document No.: 0W
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: BASF CORPORATION, 3301 BOURKE AVE., DETROIT, MI 48238
4. Generator's Phone (313) 861-1000

A. State Manifest Document Number: MI 2164824
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: (519) 864-1021
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone: (519) 864-1021

5. Transporter 1 Company Name: LAIDLAW ENVIRONMENTAL SERVICES
6. US EPA ID Number: MIT270019904
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address: LAIDLAW ENVIRONMENTAL SERVICES, R.R. #1 TELFER SIDE RD., CORUNNA, ONTARIO N0N 1G0
10. US EPA ID Number: MIT270019904

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"I"	RQ WASTE FLAMMABLE LIQUID N.O.S. (F003) FLAMMABLE LIQUID UN1993 (BUTANOL, METHYL ETHYL KETONE)	001	TT		P	D001	"H"
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above
MICROGEL WASTE WATER CODE "E"
a. ITEM - D035,D018

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

15. Special Handling Instructions and Additional Information
POINT OF EXIT FROM U.S. PORT HURON, MI DATE OF EXIT

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 conforms to the conditions of the attached E.P.A. acknowledge of consent.
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: HAROLD G. PADDOCK FOR BASF CORP
Signature:
Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [signature]
Signature: [signature]
Date: Month Day Year: 10 18 91

18. Transporter 2 Acknowledgement or 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

ALL CENTERS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 4/90

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979 as amended and Act 136, P.A. 1969

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. H I D 0 0 7 1 3 8 7 4 6 0 9 — Manifest Document No.

2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF CORPORATION
3301 BOURKE AVE.
DETROIT, MI 48238

A. State Manifest Document Number MI 2164820

B. State Generator's ID

4. Generator's Phone (313) 861-1000

5. Transporter 1 Company Name: LAIDLAW ENVIRONMENTAL SERVICES
6. US EPA ID Number: H I T 2 7 0 0 1 9 9 0 4

C. State Transporter's ID

D. Transporter's Phone (519) 864-1021

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
LAIDLAW ENVIRONMENTAL SERVICES
R.R. #1 TELFER SIDE RD.
CORUNNA, ONTARIO N0M 1G0
10. US EPA ID Number: M I T 2 7 0 0 1 9 9 0 4

G. State Facility's ID

H. Facility's Phone (519) 864-1021

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X"	RQ WASTE FLAMMABLE LIQUID N.O.S. (F003) FLAMMABLE LIQUID UN1993 (BUTANOL, METHYL ETHYL KETONE)	001	TT	19110	P	D001	*H*
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above
MICROGEL WASTE WATER CODE "E"
a. ITEM - D035,D018

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

15. Special Handling Instructions and Additional Information
POINT OF EXIT FROM U.S. PORT HURON, MI DATE OF EXIT

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 conforms to the conditions of the attached L.K.A. acknowledge of consent.
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: HAROLD G. PADDOCK FOR BASF CORP
Signature
Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date Month Day Year

18. Transporter 2 Acknowledgement or 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

ALL CERTIFICATIONS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

PR 51-0 Rev. 4-90

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID007138746 — Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
BASF CORPORATION
3304 BOURKE AVE.
DETROIT, MI 48238

A. State Manifest Document Number MI 2164829
B. State Generator's ID

4. Generator's Phone (313) 861-1000

5. Transporter 1 Company Name: LAIDLAW ENVIRONMENTAL SERVICES
6. US EPA ID Number: MIT270019904
C. State Transporter's ID
D. Transporter's Phone (519) 864-1021

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
LAIDLAW ENVIRONMENTAL SERVICES
R.R. #1 TELFER SIDE RD.
CORUNNA, ONTARIO NON 1G0
10. US EPA ID Number: MIT270019904
G. State Facility's ID
H. Facility's Phone (519) 864-1021

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"X" RQ WASTE FLAMMABLE LIQUID N.O.S. (F003) FLAMMABLE LIQUID UN1993 (BUTANOL, METHYL ETHYL KETONE)	001	TT		P	D001	"H"
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
MERCOCIL WASTE WATER CODE "E"
a. 1320 - [illegible]

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

15. Special Handling Instructions and Additional Information
POINT OF EXIT FROM U.S. PORT HURON, MI DATE OF EXIT /

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 according to applicable international and national government regulations. and conforms to the conditions of the attached E.P.A. acknowledgment of consent.
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: HAROLD G. PARROCK FOR BASF CORP — Signature — Date Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date Month Day Year

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

EPA Form 8700-22 (Rev. 9/88)

PR 5110 Rev. 4/90

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

Please print or type.

Form Approved. OMB No. 2050-0039 Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No.

Page 1 of 1

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

3. Generator's Name and Mailing Address: [illegible] CORPORATION, [illegible] BOURKE AVE., [illegible], MI 48238

4. Generator's Phone ([illegible]) 861-[illegible]

5. Transporter 1 Company Name: LAIDLAW ENVIRONMENTAL SERVICES

6. US EPA ID Number: [illegible]

7. Transporter 2 Company Name:

8. US EPA ID Number:

9. Designated Facility Name and Site Address: LAIDLAW ENVIRONMENTAL SERVICES, R.R. #1 TELFER SIDE RD., CORUNNA, ONTARIO [illegible]

10. US EPA ID Number: [illegible]

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.	16. N/A
a.	"X" RQ WASTE FLAMMABLE LIQUID N.O.S. (F003) FLAMMABLE LIQUID UN1993 (BUTANOL, METHYL ETHYL KETONE)	[illegible]	[illegible]	54160	[illegible]	[illegible]	[illegible]
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above

MICROGEL WASTE WATER CODE "K"
a. ITEM - [illegible]

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

15. Special Handling Instructions and Additional Information

POINT OF EXIT FROM U.S. PORT HURON, MI DATE OF EXIT [illegible]

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. [illegible] to the conditions of the attached E.P.A. acknowledge of consent.

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: HAROLD G. PADDOCK FOR BASF CORP

Signature: [illegible]

Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: [illegible]

Signature: [illegible]

Date: Month Day Year

18. Transporter 2 Acknowledgement or 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: [illegible]

Signature: [illegible]

Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 2nd COPY

PR 5110 Rev. 10/91

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print

Form Approved. OMB No. 2050-0039 Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID007158746 Manifest Document No.

2. Page 1 of 1

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

3. Generator's Name and Mailing Address: BASF CORPORATION, 3301 BOURKE AVE., DETROIT, MI 48238

4. Generator's Phone (313) 861-1000

A. State Manifest Document Number: MI 2856548

B. State Generator's ID

5. Transporter 1 Company Name: LAIDLAW ENVIRONMENTAL SERVICES

6. US EPA ID Number: MIT270019904

C. State Transporter's ID

D. Transporter's Phone (519) 864-1021

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: LAIDLAW ENVIRONMENTAL SERVICES, R.R. #1 TELFER SIDE RD., CORUNNA, ONTARIO N0N 1G0

10. US EPA ID Number: MIT270019904

G. State Facility's ID

H. Facility's Phone (519) 864-1021

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	N/H
a.	"Y"	RQ WASTE FLAMMABLE LIQUID N.O.S. (F003) FLAMMABLE LIQUID UN1993 (BUTANOL, METHYL ETHYL KETONE)	001	TT		P	D001	"H"
b.								
c.								
d.								

J. Additional Descriptions for Materials Listed Above: MICROGEL WASTE WATER CODE "E" a. ITEM - D035,D018

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

15. Special Handling Instructions and Additional Information: POINT OF EXIT FROM U.S. PORT HURON, MI DATE OF EXIT 7

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 [illegible] according to applicable international and national government regulations, and conform to the conditions of the attached E.P.A. acknowledge of consent.

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: HAROLD G. PADDOCK FOR BASF CORP

Signature

Date: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date: Month Day Year

18. Transporter 2 Acknowledgement or 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

IF SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

PR 5110 Rev. 10/91

GENERATOR 2nd COPY

Rev. 10/91

MANIFEST LACKING
THE POINT OF DEPARTURE
AND THE PHRASE
"AND CONFORMS TO THE TERMS OF THE
ATTACHED EPA ACKNOWLEDGEMENT OF CONSENT."

DNR

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type

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

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID007138746 — Manifest Document No.

2. Page 1 of 1

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

3. Generator's Name and Mailing Address
BASF CORPORATION
3301 BOURKE
DETROIT, MICHIGAN 48238

4. Generator's Phone (313) 861-1000

A. State Manifest Document Number: MI 2164638

B. State Generator's ID

5. Transporter 1 Company Name: LAIDLAW ENVIRONMENTAL SERVICES

6. US EPA ID Number: MIT270019904

C. State Transporter's ID

D. Transporter's Phone (519) [illegible]

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
LAIDLAW ENVIRONMENTAL SERVICES
R.R.# 1 TELFER SIDE RD
CORUNNA, ONT NON 1 GO

10. US EPA ID Number: MIT270019904

G. State Facility's ID

H. Facility's Phone (519) [illegible]-1021

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.	N/H
a. "T" RQ WASTE FLAMMABLE LIQUID N.O.S. UN-1993 FLAMMABLE LIQUID (N-BUTYL ALCHOL, XYLENE)	001	TT	39200	P	D001	"T"
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
ITEM A. D018,D035
SOLVENT TYPE WASTE WASTE PAINT

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

15. Special Handling Instructions and Additional Information
AVOID OPEN FLAMES AVOID SPARKS

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.

GENERATOR — Printed/Typed Name: HAROLD C. PADDOCK — Signature — Date (Month Day Year)

TRANSPORTER — 17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name — Signature — Date (Month Day Year)

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

FACILITY — 19. Discrepancy Indication Space

FACILITY — 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)

ALL ...S MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN, AT 1-800-292-4706 OR OUT OF STATE AT 517 373-7660 AND THE NATIONAL RESPONSE CEN... AT 1-800-424-8802 24 HOURS PER DAY.

PHOTOCOPIES OF FIELD LOGBOOK

(8)

7/29/92

15:00 Mary Freubert and Gina Gulseth copying manifests from 1989 to 1992

15:45 Discussed with Greg issues of concern

16:10 Off-site

MF 7/29/92

7/30/92

(9)

Cool, overcast · 65°F

9:00 Mary Freubert and Gina Gulseth on-site at BASF located on Milford Ave.

Lawrence A. Hajnowski and SK Shinha

BASF at its present location since 1986.

Manufacturer of coolorants and coatings - primers, undercoatings, water and solvent based coatings

(10) 7/30/92

BASF exports ~~two~~ one hazardous waste stream. BASF is permitted for two hazardous waste streams. Paint waste and solvents.

12/12/90 to 12/12/91 Permit
Waste Strip Solvent (F003)
812,000 gallons

Shipping to Laidlaw Environmental Services

Annual Reports for 1989 to 1991

7/30/92 (10)

1989 (Annual Reports)
F003 Waste Strip Solvent 54,067 gal.

1990 F003 Waste Strip Solvent 49,500 gal

1991 Waste Strip Solvent F003, F005, D001 17,900 gal.

Permit
11/29/89 to 11/17/90
Waste Paint and Solvent D001
Waste Strip Solvent F003 + F005
D001 325,000 gal.
F003 + F005 325,000 gal.

(11) 7/30/92

BASF ships about 3 shipments of waste strip solvent in 1991 for a total of 17,900 gallons. BASF does not currently ship waste paint to Laidlaw.

9:40

Mary F. and Gina G. reviewing manifests and annual reports for 1989 to 1991

1989 - 9 Shipments
manifests use F003

1990 - 8 Shipments
use F003

7/30/92 (12)

1991 ~~1992~~ MJF - F003 and F005 codes
~~expo~~ MJF except MI 1705529
dated 9/6/91 -
only uses F003

1991 MI 1705527 7/5/91
F003, F005

MI 1705528 6/12/91
F003, F005

1991 Annual report has
~~19~~ MJF F003, F005, D001
waste codes

1992 - one shipment
MI 1705530 4/8/92
used D001, F003 and F005
waste codes
5,500 gallons

(13) 7/30/92

AOC - ~~HP~~ MJF 1/11/89 - 12/31/89

① Waste Strip Solvent F003
325,000 gal.

② Waste Paint and Solvent Mix D001, F003, F005

11/29/89 - 11/17/~~89~~ 90 MJF

① Waste Strip Solvent F003 and F005

② Waste Paint and Solvent D001
325,000 gal each

12/3/90 to 12/3/91

① Waste Paint and Solvent D001 312,000 gallons

~~29~~ MJF

MJF

7/30/92 (14)

AOC - Cont'd

12/12/90 to 12/12/91

① Waste Strip Solvent F003 312,000 gallons

Discussed main issues with Larry H. and SK Sinha

11:00 M. Fuchet and G. Gulsath off site

MJF

HRE-8J

OCT 22 1992

CERTIFIED MAIL P155069114
RETURN RECEIPT REQUESTED

Mr. Allen Kinsler
Senior Project Engineer
BASF Corporation
3301 Bourke Avenue
Detroit, Michigan 48238

C.2.b

Re: Notice of Violation
BASF Corporation
EPA ID No.: MID 007 138 746

Dear Mr. Kinsler:

On July 30, 1992, your facility located in Detroit, Michigan was inspected by United States Environmental Protection Agency (U.S. EPA) representatives. The purpose of the inspection was to evaluate compliance with the requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the import or export of hazardous waste. A copy of the inspection is enclosed for your reference.

Based on information provided by facility personnel and a review of records at the time of the investigation, it was determined that the facility exports hazardous waste. It was also determined that the facility is in violation of the following requirements:

1. 40 CFR 262.53(c) (MAC R 299.9309(1)), which requires a primary exporter to provide EPA with a written renotification when changes to their original notification of intent to export occur. The shipment cannot take place until the primary exporter receives an EPA Acknowledgement of Consent reflecting the changes. At the time of the inspection, manifests reviewed indicated that waste streams different from what BASF Corporation had notified for and received an EPA Acknowledgement of Consent for were shipped to Laidlaw Environmental Services Ltd. This occurred twenty-eight (28) times during 1990 through 1991.

2. 40 CFR 262.54(c) (MAC R 299.9309(2)(c)), which requires that the primary exporter identify the point of departure of the waste from the United States in the Special Handling and Additional Information (Item 15) section of the manifest. Manifest Number MI 2164638 did not contain the required information.

3. 40 CFR 262.54(d) (MAC R 299.9309(2)(d)), which requires that the following statement be added to the end of the first sentence of the certification set forth in Item 16 of the Uniform Hazardous Waste Manifest Form: "and conforms to the terms of the attached EPA Acknowledgement of Consent." Manifest Number MI 2164638 did not contain the required information.

It is required that you submit a response in writing to this office no later than 30 days after receipt of this letter documenting the actions taken to comply with the above requirements. Failure to reply within the specified period may result in additional Federal enforcement actions.

If you have any questions and/or concerns regarding this matter, please contact Allen Wojtas of my staff at (312) 886-6194.

Sincerely yours,

ORIGINAL SIGNED BY
JOSEPH M. BOYLE
Joseph M. Boyle, Chief
RCRA Enforcement Branch

Enclosure

cc: Dennis Drake, MDNR-Lansing

f:\user\awojtas\r05054.prc\basfbor.nov

10/20/92

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
10/19/92	10/19/92	10/20/92	10/20/92

RAL RESOURCES COMMISSION
MAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

~~XXXXXXXXXXXXXXXX~~

Gordon E. Guyer, Director
Waste Management Division
505 W. Main
Northville, MI 48167

July 30, 1987

Allen Kinsler
BASF Corporation
3301 Bourke
Detroit, MI 48238

BASF Detroit

RE: MID 067247187

Dear Mr. Kinsler,

On July 23, 1987, an inspection was conducted at your facility located at 3301 Bourke, Detroit, Michigan. The purpose of the inspection was to evaluate compliance of that facility with the F-Solvent Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirements:

1. Notification is required for each shipment of waste (going to a treatment facility) that meets the definition of a restricted F-Solvent waste. This requirement includes noting which solvents are in the waste, the waste code number, manifest number, the applicable treatment standard (wastewater or other), and waste analysis data. Waste analysis data for a notification is supplying knowledge of your waste to the treatment facility. Knowledge can be shown by analysis reporting % solvents, or MSDS's, etc. Again, this information is to be supplied with each shipment of a restricted waste.

   An example of a notification form was left the day of the inspection. Send to this office an example of notification that you will adopt of a restricted waste shipment going from BASF to a treatment facility. Include a copy of the sample manifest that the notification would accompany.

Compliance with the requirements outlined above should begin with receipt of this letter.

We request your response by August 17, 1987 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 344-4670.

Sincerely,

Daria W. Devantier

Daria W. Devantier
Environmental Quality Analyst

Enclosure
DWD/mkp
cc: B. Okwumabua
EPA, Region V

RCRA/ACT 64 INSPECTION REPORT

U.S. EPA I.D. Number M I D 0 0 7 1 3 8 7 4 6
(or Michigan)

FACILITY NAME
(Mailing Address) BASF Corp
3301 Bourke
Detroit MICHIGAN 48238
CITY ZIP CODE

DATE 7/23/87 TIME OF INSPECTION (FROM)_____(TO)_____

PERSON(S) INTERVIEWED	TITLE	TELEPHONE
Allen Kinsler	Env Eng	313/861-1000

INSPECTOR(S)	AGENCY/TITLE	TELEPHONE
Daria Devantier	DNR / W.M.D.	313/344-4670

Primary Business of this Facility: _____

Reason for Inspection: LAND BAN

_____Routine _____Follow-up _____Complaint

Based upon the inspection, this facility: FORM

_____is a non-generator/liquid industrial waste generator A
_____conditionally exempt small quantity generator A
_____small quantity generator A
_____generator B
_____transporter C
_____treatment/storage/disposal facility D

Date of Last Inspection_____

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
E. R. CAROLLO
JACOB A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

COPY file

S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

March 18, 1985

Glasurit America, Inc.
3301 Bourke
Detroit, MI 48238
Attn: Allen Kinsler
Environmental Engineer

RE: MID 007138746

Dear Mr. Kinsler:

This letter is to acknowledge receipt of your letter dated March 5, 1985, indicating your compliance program for RCRA deficiencies cited during my inspection on February 7, 1985. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

Kenneth L. Damrel

Kenneth L. Damrel
Environmental Engineer
HAZARDOUS WASTE DIVISION

cc: U.S. EPA Region V
B. Okwumabua

Glasurit

March 5, 1985

RECEIVED
MAR 7 1985
HAZARDOUS WASTE DIV

Mr. Kenneth L. Damrel
Hazardous Waste Division
Michigan Dept. of Natural Resources
S.E. Michigan Office
15500 Sheldon Rd.
Northville, MI 48167

Dear Ken,

This is in response to your February 11 letter concerning violations of RCRA Subtitle C requirements at our facility. On an item by item basis:

1. A letter was posted, for employees to see, reminding them of the requirement to write the date on the hazardous waste label. This was followed up with a memo to management in the generating areas to stress the need for their cooperation. Since this began, I have not seen any omissions of the date.

2. Tank 132 now has the words "Hazardous Waste" labeled in three (3) places, clearly visible from all directions.

3. Tank 132 has been added to the weekly inspection list I use weekly.

4. A description of the training program was written, and is now on file with other pertinent data. This includes an outline of both employee orientation and the annual RCRA training, and the approximate amount of time spent on each category.

5. A copy of our contingency plan was sent registered mail, return receipt requested, to both the Detroit Police Department and the Detroit Fire Department.

6. Manifest number M10482241 was handled as requested.

3301 BOURKE / DETROIT, MICHIGAN 48238
(313) 861-1000

BASF MEMBER OF THE BASF GROUP

If you have any further questions, please call.

Sincerely,

Allen C. Kinsler
Environmental Engineer

ACK/clj

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
E. R. CAROLLO
JACOB A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

February 11, 1985

Glasurit America, Inc.
3301 Bourke
Detroit, MI 48238
Attn: Allen Kinsler
Project Engineer

MID 007 138746

Dear Mr. Kinsler:

On February 7, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at the above address. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of Subtitle C of RCRA. Specifically, the following was found:

1. Several drums of hazardous waste were not marked with the date of accumulation as required by 40 CFR 262.34 (a) 2.

2. The hazardous waste accumulation tank was not labeled with the words "Hazardous Waste" as required by 40 CFR 262.34(a)3.

3. You are not conducting daily and weekly inspections of your hazardous waste tank as required by 40 CFR 265.194.

4. Your description of required employee training must be expanded to include a written description of the type and amount of training given to each person as required by 40 CFR 265.16(d)3.

5. Your contingency plan was not submitted to local agencies as required by 40 CFR 265.53(b).

6. Your manifest files contained the DNR 2nd copy of manifest number MI0482241. It is requested that you photocopy this manifest, retain the photocopy for your record and transmit the DNR 2nd copy to the DNR.

You are requested to respond to this letter by March 8, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

K L Damrel

Kenneth Damrel
HAZARDOUS WASTE DIVISION

cc: U.S. EPA, Region V
B. Okwumabua

RCRA Inspection Report

EPA Identification Number: M I D 0 0 7 1 3 8 7 4 6

Installation Name: Glasurit America, Inc. (Former Name - Cook Industrial Coatings, Inc)

Location Address: 3301 Bourke

City: Detroit State: MI 48238

Date of inspection: 2-7-85 Time of inspection (from) 10:30 (to) 2:30

Person(s) interviewed	Title	Telephone
Allen Kinsler	Project Engineer	313-861-1000

Inspector(s)	Agency/Title	Telephone
Kenneth L. Damrel	DNR-HWD/Env. Eng.	313-459-9180

Installation Activity (mark only one box)	Inspection Form(s)
☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation	A
☐ Treatment/Storage/Disposal (no generation or Transportation)	A
☐ Generation and Transportation	B, C
☒ Generation only	B
☐ Transportation only	C

Glasurit

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. 150				
(3) Do the manifest forms examined contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements) 262.21	✓			DNR 2nd copy @ generator #MI 0482241
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓			
c. Name and EPA ID number of transporter(s)?	✓			
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. 0

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. 0

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	✓			
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	✓			
(3) If required, are placards available to transporter? 262.33	✓			
** (4) Pre-shipment Accumulation:				

** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

	Yes	No	NI	Remarks
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	✓			
i. Is each container clearly marked with the date on which the period of accumulation began?		✓		Several drums not marked with date.
ii. Have more than 90 days elapsed since the dates marked?		✓		
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	✓			
iv. Are containers in good condition?	✓			
v. Are containers compatible with waste in them?	✓			
vi. Are containers managed to prevent leaks?	✓			
vii. Are containers stored closed?	✓			
viii. Are containers inspected weekly for leaks and defects?	✓			
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	✓			

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			✓	No incompatable wastes
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			✓	
b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision)	✓			
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)		✓		
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192			✓	No corrosive materials
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?			✓	Tank is covered
iv. Do continuous feed systems have a waste-feed cutoff?			✓	Batch type
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193			✓	Always store same material
vi. Are required daily and weekly inspections done? 265.194		✓		No log but tank is in production area where it is visable
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198	✓			Non-smoking area. Closed tank. Electrically spark proof area.
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199			✓	No incompatable wastes

	Yes	No	NI	Remarks

ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 900 gallons

Tank diameter: 10' feet

Distance of tank from property line 100 feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

	Yes	No	NI	Remarks
c. Is hazardous waste accumulated in other than tanks or containers?		✓		
d. Personnel training. 262.34 (a) 5				
Do personnel training records include: 265.16				
i. Job Titles?	✓			
ii. Job Descriptions?	✓			
iii. Description of training?		✓		see remarks
iv. Records of training?	✓			
v. Did personnel receive the required training by 5-19-81?	✓			
vi. Do new personnel receive required training within six months?	✓			
vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	✓			
e. Preparedness and Prevention 265. Subpart C				
i. Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31		✓		

	Yes	No	NI	Remarks
ii. If required, does this facility have the following equipment: 265.32				
Internal communications or alarm systems?	✓			Fire alarm
Telephone or 2-way Radios at the scene of operations?	✓			Telephone
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

Sprinkler system, Foam system, Portable fire extinguishers - more than 50.

iii. Testing and Maintenance of Emergency Equipment: 265.33				
Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
Is emergency equipment maintained in operable condition?	✓			
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	✓			
v. Is there adequate aisle space for unobstructed movement?	✓			
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			Fire dept. annual tours

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52	✓			

		Yes	No	NI	Remarks
ii.	Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	✓			
iii.	Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	✓			
iv.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			
v.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	✓			
vi.	Are copies of the Contingency Plan available at site and local emergency organizations?		✓		Not available at local organizations
vii.	Is the facility emergency coordinator identified?	✓			
viii.	Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
ix.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
x.	If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?			✓	No emergency situations have occurred, only minor spills which were cleaned up by the methods specified in the contingency plan.

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	Yes	No	NI	Remarks
(1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	✓			

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)
262.50

	Yes	No	NI	Remarks
(1) Has the installation imported or exported hazardous waste? If "no", skip a and b.	✓			exporting
a. Exporting Hazardous Waste, has a generator:				
i. Notified the Administrator in writing?	✓			
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	✓			
iii. Met the Manifest requirements?	✓			
b. Importing Hazardous Waste, has the generator met the manifest requirements?			✓	Not importing hazardous waste

1. Orientation Training

Remarks: Description of Training states 2. RCRA Annual Training
Need to add description of what this
training covers.

(4-82B)

GE
3-28-84
Code R

NATURAL RESOURCES COMMISSION
JACOB A. HOEFER
ROBERT HOLMES
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

~~HOWARD A. TANNER, Director~~
Ronald Skoog, Director

February 2, 1984

Mr. Allen C. Kinsler
Project Engineer
Glasurit America
3301 Bourke Street
Detroit, Michigan 48238

Re: MID 007138746

Dear Mr. Kinsler:

I have reviewed your January 26 submittals. I agree, the tanks that receive on-site generated hazardous waste are process tanks and as such are not subject to the storage requirements.

The closure cost estimate and schedule meet the RCRA requirements and notification of impending closure has been given to EPA Region V.

You indicated in our phone conversation that the inspection is now recorded.

You should now be in compliance with the interim status standards. The facility will be inspected in the near future.

Thank you for your cooperation. Feel free to contact me if you have any questions.

Sincerely,

William E. Stone

William E. Stone
Water Quality Specialist
Compliance Section
Hazardous Waste Division
(313) 675-0860

WES/sc
cc: Ken Burda (3)

R1026

RECEIVED

JAN 27 1984

WATER QUALITY DIV.
DIST. I

Glasurit

January 26, 1984

Mr. William Stone
Compliance Section
Hazardous Waste Division
Michigan Department of Natural Resources
9311 Groh Rd.
Grosse Ile, MI 48138

MID 007138746

Dear Bill,

This letter is to confirm our telephone conversation regarding the status of the tanks used to receive spent solvent generated on site for reclamation on site.

As we discussed, these tanks are used as process vessels, in that large, heavier portions of the spent solvent are allowed to settle. These portions are then drained and are sent out as hazardous waste. The solvent is sent on for further processing.

As these tanks are used for processing and they generate a waste, we would not be required to file for storage permits or retain closure plans.

I have contacted Joe Boyle, as suggested, on the 15 meter set back for waste storage. Hopefully, we can work something out.

I have also enclosed the calculation of closure costs and the notification to the EPA of closure.

Sincerely,

Allen C. Kinsler

ACK/rmk

cc: Ken Burda (3) w/o enclosures

GLASURIT AMERICA, INC.
3301 BOURKE / DETROIT, MICHIGAN 48238
(313) 861-1000

BASF MEMBER OF THE BASF GROUP

NATURAL RESOURCES COMMISSION
JACOB A. HOEFER
ROBERT HOLMES
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
~~HOWARD A. TANNER, Director~~
Ronald Skoog, Director
Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

JES 4-17-84 on Printout Status 1 Code X

January 10, 1984

Mr. Allen C. Kinsler
Project Engineer
Glasurit America
3301 Bourke Street
Detroit, Michigan 48238

Re: MID 007138746

Dear Mr. Kinsler:

Thank you for your January letter.

The second paragraph of my December 21 letter refers to item #10 in Sue Norton's October 26 deficiency letter to you and was not intended to infer that you store containers. In item #10, she stated "you may avoid these requirements by electing to operate as a storer of the waste in barrels and abiding by the provisions of 40 CFR 265 Subpart I.". I wanted to make sure you knew that the statement was incorrect and that you could not store containers of hazardous waste but must continue to comply with 40 CFR 262.34.

I also, was aware that you store off-site and on-site generated wastes in separate tanks in separate areas. I was under the impression, however, based on my 1982 and Sue's more recent inspection, that some of the wastes you generate are listed wastes (F003 and F005) and these remain in the storage tanks longer than 90 days prior to being reclaimed. If my impression is correct, then the storage is regulated as indicated in 40 CFR 261.6(b) and the inspection log, operating log, and closure plan will have to be expanded to include those wastes. If the wastes are only characteristically hazardous or if they are not accumulated longer than 90 days before on-site reclaimation, they are indeed not regulated. Please provide a list of the EPA hazardous waste numbers of the wastes generated on site and the length of time the waste remains in the tanks prior to recycle.

I also was under the impression that the storage tanks for the waste generated on site were included in your "Part A" application. The application lists 49,102 gallons of storage in tanks. Is all this capacity to be found in building 20A and is it all for off-site waste?

Regardless of the number of regulated tanks the inspection log must be revised. The time of each inspection must be recorded. The containment and security structures and safety equipment must be inspected and the results of the inspection recorded.

The closure cost estimate sheet was not included with the closure plan submitted on November 29, 1983. I do remember reviewing the sheet during my 1982 inspection and remember that it contained an estimate of the maximum quantity of waste. The plan is still deficient in that a date of closure, a schedule of closure and a notification statement must be included.

As for the location of your container accumulation area, the 15 meter separation distance is a federal requirement (40 CFR 265.176). To my knowledge there are no exclusions to the stipulation. You should, however, contact Joe Boyle, U.S.E.P.A. Region V, 312-866-3754 to discuss the matter.

Please provide me with the information on the on-site generated waste storage tanks by January 23, 1984. The inspection log and closure plan will be examined during my next inspection.

Sincerely,

William E. Stone

William E. Stone
Water Quality Specialist
Compliance Section
Hazardous Waste Division
(313) 675-0860

WES/sc
cc: Ken Burda (3)

GlasUrit

January 4, 1984

RECEIVED

JAN 06 1984

WATER QUALITY DIV.
DIST. I

Mr. William E. Stone
Water Quality Specialist
Compliance Section
Hazardous Waste Division
9311 Groh Road
Grosse Ile, MI 48138

Dear Bill,

RE: MID007138746

In response to your letter of December 21, 1983, I would like to clear up some misunderstandings evident in your letter.

First, we are attempting to comply with 262.34. We do not want to be a container storage facility, as it relates to hazardous wastes.

Secondly, we maintain completely separate tank storage for materials from offsite sources, and for our materials that are recycled and returned to its original use. Our own material is transferred into tanks to settle and then processed separately in a different piece of equipment located in building 15. The offsite material is offloaded and processed in building 20A. Because of this separation, I do not believe that the inspection log should be expanded for the "tank wagon and still area" as the system for our own solvents are not regulated. This would also turn the closure plan into a one-step operation for the regulated system. The inventory of the maximum quantity of wastes is included on the estimate sheet for closure costs.

Lastly, I did not mean to infer that the containment device would be made completely of cement block. The containment portion would be of concrete. I was suggesting that the separation wall be made of block which has recognized fire resistance.

I need to review our next response with my superiors and the lawyers before I can substantially respond to the location problem mentioned in your letter.

Sincerely,

Allen C. Kinsler

CC: Ken Burda (3)

ACK/rmk

3301 BOURKE / DETROIT, MICHIGAN 48238
(313) 861-1000

BASF MEMBER OF THE BASF GROUP

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
JACOB A. HOEFER
ROBERT HOLMES
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
~~HOWARD A. TANNER, DIRECTOR~~
Ronald Skoog, Director

Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

October 26, 1983

CERTIFIED MAIL
Mr. Allen Kinsler
Project Engineer
Glasurit America Inc.
3301 Bourke Street
Detroit, Michigan 48238

Re: MID 007138746

Dear Mr. Kinsler:

On September 21, 1983, I visited the Glasurit America plant to determine compliance with the provisions of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. During the visit a number of violations were observed. These are listed below. Sections of the law cited refer to the Code of Federal Regulations, Title 40 (40 CFR), revised as of July 1, 1982.

1. An inspection log was not being maintained at the plant, as required by 40 CFR 265.15 (b)(1). Such a log should include the date and time of the inspection, the name of the inspector, notation of the observations made, and the date and nature of any repairs or remedial actions. The log should also note the items to be inspected (as described on the inspection schedule you have already devised).

2. Personnel training records should include the job titles and job descriptions, as required by 40 CFR 265.16(d)(1) and (2). Further, in the future, the records of annual reviews of training should be dated.

3. Contrary to the provisions of 40 CFR 265.35, the barrel storage area for paint waste did not have adequate aisle space for unobstructed movement.

4. In a related matter, although I did not observe any leaking barrels, the storage practices which I noted could easily have damaged them.

Barrels were stacked three deep, and some pallets and barrels were tilting. To secure compliance with 40 CFR 265.173, barrels should be stored upright on pallets, in stacks no deeper than two. Additionally, although you stated that containers were inspected weekly for leaks and defects, there was no record of this (see Item 1).

5. Although the Contingency Plan lists emergency equipment and its location, it lacks a physical description of each item and brief outline of its capabilities. This is required by 40 CFR 265.52(e). Further, although it is not a formal requirement, we strongly urge that the Emergency Coordinator(s) be identified as such in the Plan.

6. Although an operating record is kept for the material processed by the Nor-tru evaporator, there is no operating record kept for the barrels of waste generated by Glasurit on the premises. This is a violation of 40 CFR 265.73.

7. There was no Closure Plan available for inspection. This is contrary to the requirements of 40 CFR 265.112.

8. As a result of Items 1, 2, 6, and 7, the facility is in violation of 40 CFR 265.74, which requires that all facility records be available for inspection.

9. Ignitable waste is stored less than 50 feet from the plant property line. This is a violation of 40 CFR 265.176.

10. Although you filed as a generator only for the waste in barrels, the barrels of waste from your plant were not marked in accordance with 40 CFR 262.34. Containers were not marked with the start of accumulation date (262.34(a)(2)), nor were they marked with the words "Hazardous Waste" (262.34(a)(3)). You may avoid these requirements by electing to operate as a storer of the waste in barrels and abiding by the provisions of 40 CFR 265 Subpart I. Since I also reviewed the barrel area as a storage facility, corrections of Items 1, 3, and 4 should do much to bring this area into compliance with 40 CFR 265. You must decide which course of action you have chosen and notify us of it.

11. Lastly, the barrel-storage facility was not provided with impervious secondary containment for 150% of the volume of liquids stored. This is required by the Part V Rules of Act 245 (the Michigan Water Resources Act of 1929, as amended). It is also required by reference within Michigan Act 64, the Hazardous Waste Management Act.

We request that you respond by letter no later than November 28, 1983, documenting what actions you have taken to correct the violations cited above.

A copy of the RCRA inspection report is enclosed for your review. Please do not hesitate to call me at (313) 675-0860 if you have any questions. Thank you for the time and cooperation you extended during the inspection.

Sincerely,

Susan Norton

Susan Norton
Water Quality Specialist
Compliance Section
Hazardous Waste Division

SN
Enclosure
cc: Hazardous Waste Division, Lansing (3)
Roy E. Schrameck, Surface Water Quality Division, Grosse Ile

JES 12-28-83 Status 3 Code X

RCRA Inspection Report

EPA Identification Number: M I D 0 0 7 1 3 8 7 4 6

Installation Name: GLASURIT AMERICA — FORMERLY COOK INDUSTRIAL COATINGS

Location Address: 3301 BOURKE ST.

City: DETROIT State: MICHIGAN 48238

Date of inspection: ~~AUGUST 11, 1983~~ SEPT. 21, 1983 Time of inspection (from) 1:30 P.M. 9:00 A.M. (to) 3:00 P.M. 12:30 P.M.

Person(s) interviewed	Title	Telephone
MR. ALLEN KINSLER	PROJECT ENGINEER	313-861-1000

Inspector(s)	Agency/Title	Telephone
SUSAN NORTON	MICH. DNR / HAZ. WASTE DIVISION	313-675-0860

Installation Activity (mark only one box)	Inspection Form(s)
[X] Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation	A
[ ] Treatment/Storage/Disposal (no generation or Transportation)	A
[ ] Generation and Transportation	B, C
[ ] Generation only	B
[ ] Transportation only	C

GLASURIT AMERICA
MID007138746

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	[ ]	storage in containers CONTAINER ACCUMULATIONS REMOVED IN < 90 DAYS	I
S02	[X]	storage in tanks STILL BOTTOM TANKS	J
T01	[ ]	treatment in tanks	J
S04	[ ]	storage in surface impoundment	K,F
T02	[ ]	treatment in surface impoundment	K,F
D83	[ ]	disposal in surface impoundment	K,F
S03	[ ]	storage in waste pile	L
D81	[ ]	disposal by land application	M,F
D80	[ ]	disposal in landfill	N,F
T03	[ ]	treatment by incineration	O/P
T04	[X]	treatment in devices other than tanks, surface impoundments, or incinerators	Q

PHYSICAL PREATMENT BY FILTRATION OVER PORTABLE CONTAINERS; OPERATION OF EVAPORATOR FOR NOR-TRU CORP. (SEE BELOW).

Other activities

GENERATOR	[X]	~~APPENDIX~~	~~GN~~
TRANSPORTER	[ ]	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

T04 — PAINT FILTRATION

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

COMPANY MAKES AUTOMOTIVE PAINT & PRIMER. FACILITY IS COMPRISED OF A LACQUER PLANT & RESIN PLANT. WASTES ARE ALL D001 — IGNITABLES.

SOLVENT EVAPORATOR:
GLASURIT COMPANY PROVIDES LABOR & CERTIFICATION OF SAMPLES, AND ALSO MANAGEMENT TIME FOR A SOLVENT EVAPORATOR OWNED BY NOR-TRU (NORMAN FOSTER). NOR-TRU CORP. OWNS THE EVAPORATOR, VACUUM PUMPS, AND CONDENSER. NOR-TRU ARRANGES FOR CONTRACTS WITH GENERATORS; DRUEY BROS. TRANSPORTS WASTE SOLVENT TO GLASURIT; PETRO-CHEM (ANOTHER FOSTER COMPANY) TAKES STILL-BOTTOMS; REFINED SOLVENT IS NOT IN A CLOSED-LOOP [illegible] WITH GENERATORS. GLASURIT GETS 24¢/GAL OF RECOVERED SOLVENT. GLASURIT HAS LIMITED THE

DEAL WITH IN THEIR LACQUER & RESIN OPERATIONS. THIS IS BECAUSE OF CONVENIENCE FOR TRAINING PERSONNEL (I.E., THEY ARE ALREADY FAMILIAR WITH TYPE OF MATERIAL IN QUESTION). ALSO, SOMETIMES THEY PURCHASE SOME OF THE SOLVENT FOR THEIR OWN USE.

~~COMPANY SUBMITTED~~ PART B NOT CALLED IN YET.

IS PAINT/THINNER FILTRATION "TREATMENT"?
WASTE

IS EACH FILTRATION DRUM A# TREATMENT UNIT?

WHEN EVAPORATOR IS REMOVED, IF FILTRATION IS NOT TREATMENT, FACILITY WILL JUST BE A GENERATOR.

BOTH FILTRATE & WASTE THINNER IGNITABLE.
WASTE THINNER WILL NOT BE RECOVERED FOR RECYCLE OR ENERGY USE
WHAT IS IN DEFINITIONS PENDING

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?				N/A
b. Facility expansion?				N/A
c. Change of owner or operator?	X			FORMERLY COOK INDUSTRIAL COATINGS, NOW GLASURIT AMERICA - OWNED BY BASF
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X			
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	X			
or				
b. i. Artificial or natural barrier around facility?	X			
and				
ii. Controlled entry?	X			
c. Danger sign(s) at entrance?	X			
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	X			

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	X			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	X			
ii. safety and emergency equipment?	X			
iii. security devices?	X			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	X			
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	X			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	X			
d. Are areas subject to spills inspected daily when in use?	X			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?		X		USE OF LOG IS ABOUT TO BE PUT INTO EFFECT.
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?				
ii. the name of the inspector?				
iii. a notation of the observations made?				
iv. the date and nature of any repairs or remedial actions?				
5. Do personnel training records include: 265.16				
a. Job titles?		X		
b. Job descriptions?		X		

	YES	NO	NI	Remarks
c. Description of training?	X			
d. Records of training?	X			
e. Did facility personnel receive the required training by 5-19-81?	X	X		SOME EMPLOYEES [redacted] HAD RECEIVED PARTIAL TRAINING BY MAY 19, 1981
f. Do new personnel receive required training within six months?	X			NO NEW PERSONNEL – HOWEVER, TRAINING WOULD BE PART OF 1ST WEEK'S ORIENTATION TO PLANT
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?		X		HOWEVER, MR KINSLER INDICATED THAT ALTHOUGH SIGN-IN SHEET FOR TRAINING WAS UNDATED, [redacted] THE TRAINING OCCURRED MAR. 14, 1985.
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	X			
b. No smoking signs?	X			
c. Separation and protection from ignition sources?	X			

MID007138746

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

	YES	NO	NI	Remarks
1. Maintenance and Operation of Facility: 265.31				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		X		
2. If required, does the facility have the following equipment: 265.32				
a. Internal communications or alarm systems?	X			
b. Telephone or 2-way radios at the scene of operations?	X			
c. Portable fire extinguishers, fire control, ~~spill control~~ equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control:

CITY SUPPLY W/BOOSTER PUMP

	YES	NO	NI	Remarks
3. Testing and Maintenance of Emergency Equipment: 265.33				
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
b. Is emergency equipment maintained in operable condition?	X			
4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	X			
5. Is there adequate aisle space for unobstructed movement?	X YES FOR TANKS; NO FOR BARREL STORAGE			
6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	X			

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

PIP PLAN IS USED TO COVER ALL MATERIALS

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			UNDERLINED INFO NOT PROVIDED.
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	X			

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	X			BUT IS NOT TITLED AS E.C. (MENTION IN LETTER)
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				NOT APPLICABLE

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	X			
b. Are records of past shipments retained for 3 years?	X			
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	X			

** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.

	YES	NO	NI	Remarks
3. Operating Record 265.73				AN OPERATING RECORD IS KEPT FOR THE MATERIAL PROCESSED BY NOR-TRU EVAPORATOR & THE SLUDGE GENERATED IN OPERATING IT. THERE IS NO OPERATING RECORD KEPT FOR BARRELS OF WASTE THE PLANT GENERATES IN ITS OWN OPERATIONS.
a. Does the owner or operator maintain an operating record as required in 265.73?	X			ALL QUESTIONS DEAL W/ EVAPORATOR ONLY
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	X			
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	X			
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

MID007138746

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		NOT APPLICABLE		
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			
v. Reports detailing all incidents that required implementation of the Contingency Plan?		NOT APPLICABLE		
vi. All closure and post closure costs as applicable?		NOT APPLICABLE		
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?		X		
5.**Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?		COULD NOT FIND ANY EVIDENCE OF THIS ACTIVITY.		
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.		N/A.		

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

MID007138746

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				CLOSURE PLAN NOT AVAILABLE FOR INSPECTION. CLOSURE PLAN DEVELOPED w/ ASSISTANCE OF MARINE POLLUTION CONTROL.
a. Is the facility closure plan available for inspection?				
b. Does the plan identify:				
i. maximum extent unclosed during facility life?				
ii. maximum hazardous waste inventory?				
iv. estimated year of closure?				
v. schedule of closure activities?				
c. Has closure begun?				
*2. Post-Closure 265.118				THIS SECTION NOT APPLICABLE
a. Is the post-closure plan available for inspection?				
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

*Applies only to disposal facilities.

MID009138946

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	X			NO IMPERVIOUS CONTAINMENT OR DIKING - VIOLATION OF
2. Are containers compatible with waste in them? 265.172	X			ACT 245 (& ACT 64, 84 INCLUSION)
3. Are containers managed to prevent leaks? 265.173	X			STACKED TOO HIGH - 3 DEEP SOME PALLETS TILTING
4. Are containers stored closed?	X			
5. Are containers inspected weekly for leaks and defects.	X	NO RECORDS, HOWEVER		
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176		X		
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	N/A			
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	N/A			

Section J - TANKS (Part 265, Subpart J)

	YES	NO	NI	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	X			THERE ARE NO WASTE STORAGE TANKS PER SE; THERE ARE PRODUCTION TANKS IN WHICH STILL BOTTOMS ACCUMULATE. COMPANY DESIRED TO FILE THESE TANKS AS "WASTE STORAGE" BECAUSE THEY ASSUMED STILL BOTTOMS ACCUMULATED LONGER THAN 90 DAYS.
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?				NO UNCOVERED TANKS
3. Do continuous feed systems have a waste-feed cutoff?				NOT APPLICABLE - FEED TO TANKS IS IN BATCHES
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				NO CHANGES IN TYPE OF MATERIAL BEING STORED
5. Are required daily and weekly inspections done? 265.194	X			INSPECTIONS MADE BUT NOT RECORDED
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	X			
7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)				NO INCOMPATIBLE WASTES

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 4900 gallons

Tank ~~diameter~~ SQUARE: 50' x 10' DEEP x 5' WIDE HIGH feet

Distance of tank from property line SHORTEST DISTANCE IS 60 FEET feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	X			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	N/A - BOTH FILTRATION & EVAPORATION ARE BATCH PROCESSES.			
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	NOT APPLICABLE - NO SUBSTANTIAL CHANGES IN WASTES OR PROCESSES.			
4. Are inspection procedures followed according to 265.403?	X			BUT INFO IS NOT RECORDED.
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	X			
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406		X		

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#1D007138746

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	X			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. 48				12 - DRUMMED PAINT SCRAP WASTE 36 - GENERATED BY EVAPORATOR
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	X			
b. Name, mailing address, telephone number, and EPA ID number of Generator	X			
c. Name and EPA ID Number of Transporter(s)?	X			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	X			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			HAZARD CLASS MISSING FROM MOST OF EVAP. WASTE MANIFESTS - IS SAME AS DOT SHIPPING NAME, NOWEN
f. The total quantity of waste(s) and the type and number of containers loaded?	X			
g. Required certification?	X			
h. Required signatures?	X			

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. N/A

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. N/A

MID007138746

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	X			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	X			
3. If required, are placards available to transporters of hazardous waste? 262.33	X			

4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box ☐ and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision

	YES	NO	NI	Remarks
a. Is each container clearly marked with the start of accumulation date?		X	???	
b. Have more than 90 days elapsed since the date inspected in (a)?	CAN'T TELL			
c. Do wastes remain in accumulation tanks for more than 90 days?	NOT APPLICABLE			
d. Is each container and ~~tank~~ labeled or marked clearly with the words "Hazardous Waste"?		X		

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	X			

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

	YES	NO	NI	Remarks
1. Has the installation imported or exported Hazardous Waste? 262.50		X		ARE PLANNING TO EXPORT, BUT HAVE NOT YET

(If answered Yes, complete the following as applicable.)

a. Exporting Hazardous waste; has a generator:

MID007138746

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?				N/A
ii. Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste; has the generator met the manifest requirements?				

NATURAL RESOURCES COMMISSION
CARL T. JOHNSON
E. M. LAITALA
DEAN PRIDGEON
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

AH

STATE OF MICHIGAN

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, BOX 30028, LANSING, MICHIGAN 48909
HOWARD A. TANNER, Director

9311 Groh Road
Grosse Ile, Michigan 48138

March 8, 1982

MID007138746

Mr. Allen C. Kinsler
Emergency Coordinator
Cook Industrial Coatings, Inc.
3301 Bourke
Detroit, Michigan 48238

Dear Mr. Kinsler:

We are in receipt of your February 24, 1982 letter. You indicate that the facility has complied with the violations of subtitle C of the Resource Conservation and Recovery Act (RCRA) found during our January 29 inspection and reinterated in a February 16, letter.

Thank you for your prompt attention to this matter. If you have questions concerning RCRA or hazardous water management feel free to contact us at (313) 675-0860.

Yours truly,
WATER QUALITY DIVISION

Roy E. Schrameck

Roy E. Schrameck
District Engineer

William E. Stone

William E. Stone
Water Quality Specialist

WES/sc

cc: Al Howard OHWM (2)
John Bohunsky/WQD Files
xc EPA

MICHIGAN
THE GREAT LAKE STATE

R1026 10/76

COOK

February 24, 1982

Mr. Roy Schrameck
Michigan Department of Natural Resources
9311 Groh Road
Grosse Ile, MI 48138

Gentlemen:

In response to your letter dated February 16, 1982, concerning shortcomings in our R.C.R.A. compliance program (facility I.D. #MID007138746):

1. On February 24, I held training sessions for personnel, including supervisors and laboratory technicians involved in the handling of hazardous wastes. The sign-in sheets are included. The training was conducted, covering the revised fire, safety and spill procedures, as recommended.

2. On the same day, the qualifications and job descriptions of the supervisors and lab technicians were included in the plans. These positions, I might note, were not changed in either qualification or description, but now these items are officially part of the plan.

I have notified all concerned that we will be unable to accept any materials that we cannot process when the state regulations are in effect. We are now removing these solvents from our facility, and will not accept them until we are confident we can handle them safely for reclamation.

Sincerely,

Allen C. Kinsler
Project Engineer

ACK/lri
Encls.

RECEIVED

FEB 26 1982

WATER QUALITY DIV.
DIST. I

COOK INDUSTRIAL COATINGS, INC.
P. O. BOX 38009 — DETROIT, MICHIGAN 48238
Telex 23-0589 Phone 313—861-1000

8:00 a 2/24/82

Gary Sitz
J. Lambert
Keri Davis
Bill Kamm
Roy Smith
Larry R. Douglas
David L. Collins
Willard Miller
SAM BINNO
Dobek
Mark E. Rowe
Md Jessum
Joe Dennis
[illegible]
Robert Noble
[illegible]
Carl L. Washington
William C. Lynem
Paul Dashovetz
Carl Szewczyk

1. Phone ext 286 intermittent outages
2. Keys to Coroc office to supervisors.
? Steam pipe to new still (bet. tanks & stb) must be insulated

3:00 PM 4/24

Wayne E. Tapham
Noel Demers
Blake Sayden
Kenneth Mathews
Ron Michalak
Dave Seely
Bill Pendergast
John P. Atkinson
Bill Parsons
Ken Perry
Chuck Butler
Joanne Carros
Kevin Lockwood
[illegible]
Hesch [illegible] ☆
Marshall Caruthers ☆
Ilar L. Harris
Andy Pritz
Carlos Sherrill
C. Luke ☆
M. Kohoszhan
C. Allen ☆

NATURAL RESOURCES COMMISSION
CARL T. JOHNSON
E. M. LAITALA
DEAN PRIDGEON
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

STATE OF MICHIGAN

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, BOX 30028, LANSING, MICHIGAN 48909
HOWARD A. TANNER, Director

9311 Groh Road
Grosse Ile, MI. 48138

February 16, 1982

Mr. Allen C. Kinsler
Emergency Coordinator
Cook Industrial Coatings, Inc.
3301 Bourke
Detroit, MI. 48238

Dear Mr. Kinsler:

On January 29, 1982 your facility (MID007138746) was inspected to determine compliance with subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 as amended. The facility is a generator, and storer of hazardous waste and subject to the Act.

Investigation found the plant to be in violation of the Personnel Training Records requirement of RCRA (40 CFR 265.16). Specifically, the records did not contain the name of each employee, the date each employee recieved training nor did they include data on supervisory and laboratory personnel. Also, the description of training must be expanded to include the fire, safety, and spill training each employee recieves. Please provide written documentation to this office by March 30, 1982 of actions taken to correct these deficiencies.

Although not a violation of subtitle C, I recommend that you not accept for storage wastes that cannot be processed in the solvent still.

Thank you for your cooperation during the inspection. If you have any questions reguarding this matter contact me at (313) 675-0860.

Yours truly,

WATER QUALITY DIVISION

RES

Roy E. Schrameck, P. E.
District Engineer

WES

William E. Stone
Water Quality Specialist

FEB 19 1982
ACT 64

WES:WES

cc: 2 Al Howard
John Bohusky

xc: EPA ✓

MICHIGAN
THE GREAT LAKE STATE

R1026 10/76

STATE IDENTIFICATION NUMBER
(If Applicable)

MID007138746
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Cook Industrial Coatings Inc.

(b) Street: 3301 Bourke

(C) City: Detroit (D) State: Mi. (E) Zip Code: 48239

(F) Phone: 313/861-1000 (G) County: Wayne

(H) Operator: Same

(I) Street:

(J) City: (K) State: (L) Zip Code

(M) Phone: (N) County:

(O) Owner: Same

(P) Street:

(Q) City: (R) State: (S) Zip Code:

(T) Phone: (U) County:

(V) Date of Inspection: 1/29/82 (W) Time of Inspection (From) 1:15p (To) 4:45p

(X) Weather Conditions: Clear, Sunny, wind - light, air temp ~25°F

Rev. 1-26-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Allen C. Kinsler	Process Engineer	313/861-1000

(Z) Inspection Participants	Agency/Title	Telephone
William E. Steve	Mich. DNR	313/875-2860
	Water Qual	

(AA) Preparer Information

Name	Agency/Title	Telephone
Same as Z		

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

✓ A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		X		
2. Facility expansion?		X		
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
2. Does the owner or operator have detailed waste analysis plan on file at the facility?	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X			
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X			
2. Artificial or natural barrier around facility?	X			
3. Controlled entry?	X			
4. Danger sign(s) at entrance?		X		No smoking signs
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X			
2. Records of operator error?	X			
3. Records of discharges?	X			

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule:	X			
5. Safety, emergency equipment?	X			Fire-weekly; safety quart
6. Security devices?	X			
7. Operating and structural devices?	X			
8. Inspection log?	X			
(E) Do personnel training records include: (Effective 5/19/81)				need to expand to include all personnel
1. Job Titles?	X			dealing with waste (lab-
2. Job Descriptions?	X			Supervisors) Training
3. Description of Training?	X			should be expanded to
4. Records of Training?		X		include breathing app.
5. Have facility personnel received required training by 5-19-81?		X		Recieve fire training
6. Do new personnel receive required training within six months?		X		once per year. OSHA training
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X			
2. No smoking signs?	X			
3. Separation and protection from ignition sources?	X			

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

1. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? — X — _____

(B) If required, does the Facility have the Following Equipment:

1. Internal communications or alarm systems? X — — _____

2. Telephone or 2-way Radios at the scene of operations? X — — _____

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? X — — _____

Indicate the volume of water and/or foam available for fire control:

Units: Inplant pump + sprinkler system
light water foam + expansion foam systems and portable a
overhead dry chem. System in still area

(C) Testing and Maintenance of Emergency Equipment:

1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment? X — — _____

2. Is Emergency Equipment Maintained in Operable Conditions? X — — _____

(D) Has Owner or Operator Provided Immediate Access to Internal Alarms? (if needed) X — — _____

ot Inspected

Is there adequate aisle space for unobstructed movement?	X			

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
2. Arrangements agreed to by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			Copies of letters sent - verbal agree w/ fire
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			are updating

*Not Inspected

	Yes	No	NI*	Remarks
(b) Are copies of the Contingency Plan Available at Site and local Emergency Organizations?	X			at Plant only
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				N.A.

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

off site waste

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	X			
2. Are records of past shipments retained for 3 years	X			
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	X			

*Not Inspected

II. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?	X			
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?	X			
c. The location and quantity of each hazardous waste within the facility?	X			
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest numbers if waste was accompanied by a manifest.)				N.A.
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			
f. Reports detailing all incidents that required implementation of the contingency plan?				N.A.
g. All closure and past closure costs as applicable? (Effective 5-19-81)	X			

** See page 33252 of the May 19 , 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

I. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?	X			
2. Has this plan been submitted to the Regional Administrator		X		
3. Has Closure begun?		X		
4. Is closure estimate available by May 19, 1981?	X			
(B) Post Closure Care and Use of Property				
Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?				N.A.

IX. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Cook Ind. Coatings Date of Inspection: 1/29/82

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	X			Indicate if waste is: ☒ Ignitable, ☐ Reactive

*Not Inspected

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				N.A.
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?				N.A.

J
TANKS

Facility Name: Cook Ind Coatings Date of Inspection: 1/29/82

	Yes	No	NI*	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	X			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement structures?				N.A.
3. Do continuous feed systems have a waste-feed cutoff?				N.A.
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				N.A.
5. Are required daily and weekly inspections done?	X			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	X			Indicate if waste is: ☒ Ignitable ☐ Reactive
7. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				N.A.

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 3,000 gallons

Tank diameter: ~10 feet

Distance of tank from property line 75 feet

(See table 2 - 1 through 2 - 6 of NRPA's "Flammable and Combustible Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective covers?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are imcompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

L

WASTE PILES

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from the wind?	___	___	___	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	___	___	___	_____
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	___	___	___	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	Indicate if waste is: ☐ Ignitable, ☐ Reactive			
	___	___	___	_____
5. Are piles of reactive or ignitable waste protected?	___	___	___	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____
7. Are piles of imcompatible waste protected by barriers or distance from other waste?	___	___	___	_____

*Not Inspected

M

LAND TREATMENT

FAcility Name: _____ Date of Inspection: _____

1. Is hazardous waste treated capable of biological or chemical degradation? ___ ___ ___ _____

2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? ___ ___ ___ _____

3. Is waste analyzed according to 265.273? ___ ___ ___ _____

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? ___ ___ ___ _____

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? ___ ___ ___ _____

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? ___ ___ ___ _____

7. Are records kept regarding application dates, ~~and~~ rates, quantities, and locations of all hazardous waste placed in the facility? ___ ___ ___ _____

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? Indicate if waste is: ☐ Ignitable ☐ Reactive ___ ___ ___ _____

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) ___ ___ ___ _____

*Not Inspected

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	___	___	___	_____
**2. Collection of run-off from active portions of the fill?	___	___	___	_____
**3. Is collected run off treated?				_____
4. Control of wind disposal of hazardous waste?	___	___	___	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	___	___	___	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	___	___	___	_____
2. Has this plan been submitted to the Regional Administrator?	___	___	___	_____
3. Has Closure begun?	___	___	___	_____
4. Is Closure cost estimate available by 5-19-81?				
(D) Special requirements ~~fro~~ for ignitable or reactive waste				
Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive?	___	___	___	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements) If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(E) Special requirements for Incompatible Wastes. Does the owner or ooperator dispose of incompatible wastes in separate cells?	___	___	___	_____
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
2. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
3. Does the landfill have a functional leachate collection system?	___	___	___	_____
4. Are fee liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being, buried beneath the surface of the landfill?	___	___	___	_____

*Not Inspected

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment:): _____

_____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.	_____	___	___	___	_____
2.	_____	___	___	___	_____
3.	_____	___	___	___	_____
4.	_____	___	___	___	_____
5.	_____	___	___	___	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

		Yes	No	NI*	Remarks
1.	Required analyses; has an analysis been performed for the following:				
	a. Heating value	___	___	___	_____
	b. Halogen content	___	___	___	_____
	c. Sulfur content	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
2. Documented, written data may be substituted for analysis for these. Are either present for:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Combustion/emission control instruments monitored at least every 15 minutes	___	___	___	_____
B. Steady state maintained or corrections attempted?	___	___	___	_____
C. Stack Plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Emergency shutdown controls, system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected
**Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1.250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q
CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	___	_____
2. Is a continously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutraliz wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the Manifest available for review?	X	___	___	_____
(B) Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	___	___	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	X			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6. The total quantity of waste(s) and the type and number of containers loaded?	X			
7. Required Certification?	X			
8. Required Signatures?	X			
(C) Does the Owner or Operator Submit Exception Reports when Needed?				NA

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off site)	X			
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? (Required to movement of hazardous waste off site)	X			
(C) If required, are placards available to transfer?	X			

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	___	___	___	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days	___	___	___	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	___	___	___	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	_____
c. Do continous feed systems have a waste-feed cutoff?	___	___	___	_____
d. Are required daily and weekly inspections done?	___	___	___	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	___	___	___	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	___	___	___	_____

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			will do
(B) Has the Generator submitted Annual Reports and Exception Reports as required?	X			

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
(A) Has the installation imported or exported Hazardous Waste?		X		

(If A was answered Yes, then complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
a. Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
(A) Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	___	___	___	_____

II. INTERNATIOINAL SHIPMENTS

A. Does the Transporter record on the manifest the date the waste left the U.S.?	___	___	___	_____
B. Are signed completed manifest(s) on file?	___	___	___	_____

V. MISCELLANEOUS

A. Does Transporter transport hazardous waste into the U.S. from abroad	___	___	___	_____
B. Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

The plant manufactures paints, varnishes and other coatings and resins. They reclaim their spent solvents in a simple, small, single stage still. They also buy spent solvents from off-site generators, reclaim them, and sell the product.

The off-site wastes are transported in drums or bulk. The bulk liquids are placed in three, 3,000 gal., outside above ground, tanks. Solids are settled and then the liquids are transfered to inside above ground tanks containing identical solvents. The solvents are then processed in the still. The still bottoms are stored in three, inside 3,000 gal above ground tanks. The spent solvents are stored for less than one year before processing.

The facility generates at least three types of waste that require off-site disposal: 1) Still bottoms (to reclaimer or incinerator) 2) ignitable wastes from resin production (incinerator) 3) wastes (solvents) generated on and off-site that can not be processed in the still. Off site wastes of this type included (in storage) at the time of the inspection, 1,1,1 trichloroethane and tetrahydrofuran. The generated wastes are stored onsite for less than one year.

Deficiencies:

1) Personnel Records do not include dates of training nor do they indicate which person recieved which training. Training should be expanded to include supervisory and lab personnel. Include description of fire and breathing app. training. (40 CFR 265.16)

5EWHME

Allen Kinsler, RCRA Coordinator
Cook Industrial Coatings, Inc.
3301 Bourke Street
Detroit, Michigan 48238

26 JAN 1981

RE: NOV, Cook Industrial Coatings, Inc.
Detroit, MI, MID007138746

Dear Mr. Kinsler:

Notice is hereby given that the United States Environmental Protection Agency (U.S. EPA) has determined that the referenced treatment, storage and disposal facility was in violation of a requirement of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended. Specifically, it has been determined that Cook Industrial Coatings, Inc. was in violation of Section 3004 of RCRA (42 USC 6924).

On November 25, 1980, your facility completed an entry in item III. A. of the State of Michigan Industrial Waste Disposal Manifest No. 109110. Your facility identification number was entered by using the State of Michigan Number in error. Based on a January 12, 1981, telephone conversation between you and Mr. William A. DeBord of my staff, we are aware that you recognize this error and have taken steps to correct your records to reflect the correct EPA Identification Number, MID007138746, and further that you have established procedures to prevent manifest entry errors in the future.

We consider your foregoing reply as an adequate explanation of the reason for this violation and consider the corrective action taken is satisfactory Therefore, you are not required to reply to this Notice of Violation.

Very truly yours,

Kenneth A. Fenner, Chief
Water & Hazardous Materials
Enforcement Branch

cc: Dr. Howard A. Tanner
Director, Michigan Department of
Natural Resources

Richard Lundgren
Michigan Department of Natural
Resources

bcc: Gardebring/Bryson
Constantelos/Klepitsch
Boyle
Leder
Baumgartner
DeBord
DEBORD/fw/01-19-81:6-6715

KAF

MB 1-21-81

B.B.

Left message for Joe Boyle 1/22

MANIFEST VIOLATIONS DISPOSITION FORM

*Type Report
E = Manifest Exception Report from Generator
U = Unmanifested Waste Report from TAS Facility
D = Discrepancy Report from TSD Facility

1. *Type Report: E

2. Reported by:

a. Date of Report 12-8-80

b. Name Dow Corning Corporation

Address 3901 S. Saginaw Road (per Notification List) MB
Street or Route Number

Midland Mich. 48640
City or Town State Zip Code

Phone No. 517-496-4044
Area Code & Number

c. EPA I.D. No. MID 008 09632

d. Manifest Document No. 109110

3. Date Report Received by State: Unknown - rpt. was sent to U.S. EPA + MDNR on same date (12-8-80)

4. Description of State follow-up action (including name of State assignee, file data reviewed, person(s) contacted by State, date(s) and type of contact(s), and information obtained):
State contacted Dow Corning Corp. by phone to discuss incorrect name of processor under I.C. and incorrect EPA I.D. No. for TSD under III. A. of manifest. MDNR (Richard Lundgren) suggested that Dow Corning Corp. notify U.S. EPA of the errors.

5. List of Supporting Documents Attached:
12-8-80 letter to Joseph Boyle, EPA, from Dow Corning and Mich. Indus. Waste Disposal, Manifest No. 109110 and Bill DeBord's 1-12-81 telephone call to Dow Corning and Cook Industrial Coatings.

6. Type of Enforcement Action Recommended by State:
None

7. Disposition Form Signed and Dated by State:

8. Issue NOV's to generator and TSD noting that administrative errors were corrected by both parties.

W Baumgartner 1-13-81

DOW CORNING

December 8, 1980

Mr. Joseph Boyle
Hazardous Waste Section
US EPA - Region V
230 So. Dearborn St.
Chicago, ILL 60604

Dear Mr. Boyle:

Mr. Rick Lundgren of the Michigan DNR, Water Quality Division recommended that I contact you regarding a clerical error on a recent manifest covering the shipment of by-product solvent to a reclamation firm.

CHEM RECOVERY

NOV 10/80

On November 24, 1980, the Midland Plant of Dow Corning sold and shipped a trailer load of by-product methanol. This material was shipped under a Michigan Industrial Waste Manifest form. Due to a clerical error, an incorrect receiver was designated on the form. The completed manifest was sent back to the DNR showing the name of the actual receiver - COOK INDUS COATINGS NOV (processor) thus initiating a call from the Michigan DNR.

By means of this letter I am indicating to you that Dow Corning is making a more concerted effort to avoid errors in manifesting by-products. For your information, a copy of the original manifest accompanies this letter. Cook Industrial Coatings has also informed us that their ID number is MID 007138746.

Sincerely yours,

James W. Pollack

James W. Pollack, Manager
Midland Plant Waste Control
(517) 496-4044

cc: Mr. Richard Lundgren
Michigan DNR
Water Quality Division
P.O. Box 30028
Lansing, MI 48909

cc: D. F. Meyer (129)
H. Rolka (10)

8-378-5621

INDUSTRIAL WASTE DISPOSAL MANIFEST

MICHIGAN DEPARTMENT OF NATURAL RESOURCES — ENVIRONMENTAL PROTECTION BUREAU

№ 109110

I. GENERATOR DESCRIPTION AND DISPOSITION OF WASTE (MUST BE FILLED IN BY PRODUCER)

A. GENERATOR OF WASTE: FACILITY NUMBER MID 000809632

NAME Dow Corning Corporation

ADDRESS Midland, MI 48640

PRODUCER ORDER NO. 7226-027 SHIPMENT DATE 11 (mo.) 24 (da.) 80 (yr.)

PERSON TO CONTACT James W. Pollack PHONE 517/496-4044

B. DESCRIPTION OF WASTE (Mandatory) UN1993 HAZARD CLASS: Flammable Liquid

SHIPPING NAME: (DOT OR EPA) RQ Waste, Flammable Liquid N.O.S.

SIC CODE	PHYS. STATE	TYPE OF CONTAINER	QUANTITY	UNIT	WASTE TYPE	PERCENT SOLIDS
2869	2	11	5000	2	30	2

CODES:

PHYSICAL STATE 1 = SOLID 2 = LIQUID 3 = GAS 4 = SLUDGE

CONTAINER TYPE 1 = 55 GAL. DRUM 2 = BULK TANK 3 = SELF CONTAINED UNITS 4 = OTHER (Specify)

UNIT 1 = CU.YDS. 2 = GALLONS 3 = POUNDS

WASTE TYPE (SEE INSTRUCTIONS) 99 = OTHER (Specify)

MAJOR COMPONENTS (GREATER THAN 1% CONCENTRATION)

		CONCENTRATION Upper %	CONCENTRATION Lower %
1.	methanol	98	95
2.	silicones	10	5
3.	H_2O	2	1
4.			
5.			
6.			

INDICATE IF THE WASTE CONTAINS ANY OF THE MATERIALS LISTED IN TABLE TWO.

PARAMETER NO.	CONCENTRATION
____-___-__	
____-___-__	
____-___-__	
____-___-__	

EMERGENCY SPILL INFORMATION Emergency Contact No. 517/496-5900

Product No. Q1-8018 - 601 Bldg.

C. NAME OF HAULER Drury Bros.

BUSINESS ADDRESS 11950 E. Newburg Durand, MI 48429

NAME OF PROCESSOR Chemical Recovery Romulus, MI 48174

SITE ADDRESS 36345 Van Born Rd.

D. GENERATOR CERTIFICATION:

THIS IS TO CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY THAT THE MATERIALS DESCRIBED IN I/B 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 AND THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

NAME & TITLE (please print)	SIGNATURE	DATE
J. W. Pollack/Mgr.	J. W. Pollack	11/24/80

Keep goldenrod copy for your records. Send pink copy to:

DEPARTMENT OF NATURAL RESOURCES, WATER QUALITY DIVISION, P.O. BOX 30028, LANSING, MI 48909

II. HAULER OF WASTE (MUST BE FILLED IN BY HAULER)

A. NAME Drury Bros

ADDRESS 11950 Newburg Rd. Durand Michigan

TELEPHONE NUMBER 517-288-2070 PICK-UP DATE 11 (mo.) 24 (da.) 80 (yr.)

B. HAULER JOB NUMBER FACILITY NUMBER MID 0569 [illegible]

C. VEHICLE LICENSE NO. 2275 RJ STATE Mich

D. HAULER CERTIFICATION:

THIS IS TO CERTIFY UNDER THE PENALTY OF PERJURY THE WASTE DESCRIBED IN PART I/B OF THIS MANIFEST OR IN THE ATTACHMENT WAS ACCEPTED BY ME FOR TRANSPORTATION TO THE PROCESSING FACILITY NAMED IN PART I/C.

NAME AND TITLE (please print)	SIGNATURE	DATE
Chuck Davis	Chuck Davis	11-24-80

Keep canary copy for your records.

Storage

III. PROCESSOR OF WASTE (MUST BE FILLED IN BY TREATMENT/STORAGE/DISPOSAL FACILITY)

FACILITY NUMBER MID 000000654

A. NAME *Cook Industrial Ctgs Inc MID 007138746

ADDRESS 3301 Bourke Detroit 48238

TELEPHONE NUMBER UNI1000 (313) 861-1000 ACCEPTANCE DATE 11 (mo.) 25 (da.) 80 (yr.)

B. PROCESS METHOD:

☐ INCINERATION ☐ RECLAMATION ☒ OTHER (Specify) Storage

C. CERTIFICATION:

THE HAULER NAMED ABOVE DELIVERED THE WASTE DESCRIBED IN PART I/B OF THIS MANIFEST TO THIS PROCESING FACILITY. IT WAS ACCEPTABLE MATERIAL FOR PROCESSING UNDER THE TERMS OF FEDERAL, STATE, AND LOCAL REGULATIONS. I CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

NAME AND TITLE (please print)	SIGNATURE	DATE
William Freeman	William Freeman	11/25/80

Keep green copy for your records. Send white copy to:

DEPARTMENT OF NATURAL RESOURCES, WATER QUALITY DIVISION, P.O. BOX 30028, LANSING, MI 48909

* Allen Kinsel W/E

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM AT 517-373-7660, 24 HOURS PER DAY AND THE NATIONAL RESPONSE CENTER AT 800-424-8802

R-4896 11/78

D. Corrective Action

POWERED BY Dialog

BASF CORP AUTOMOTIVE OEM
14700 DEXTER AVE
DETROIT, MI 48238-2121

Telephone: 313-841-1000
County: WAYNE
Metropolitan Statistical Area (MSA): DETROIT, MICHIGAN

Industry: BUSINESS & PERSONAL SERVICES

Primary Standard Industrial Classification (SIC) and Yellow Page Product Line:
7538 (GENERAL AUTOMOTIVE REPAIR SHOPS)
753801 (AUTOMOBILE REPAIRING & SERVICE)

Employees at this Location: 3 (Estimated)
Location Sales($): 345,000

Revision Date: February 2003

American Business Directory
© 2003 American Business Information. All rights reserved.
Dialog® File Number 531 Accession Number 5746590

EPA United States Environmental Protection Agency

Handler Detail

RCRA Info

BASF CORP **DETROIT** **MID007138746**

** = Indicates source record used for Universe Calculations

Handler Universes										
In a Universe	Genstatus	Transporter	Univ Waste	Recycler	Used Oil	Furnace Exempt	Importer	Onsite Burner Exem	Mixed Waste Gen	Underground Injection
Y	LQG	N	N	N	NNNNNNN	N	N	N	N	N

Permitting and Corrective Action Universes								
Permit Workload	Closure Workload	Postclosure Workload	Permit Progress	CA Workload	Subject to CA	Subject to CA - TSD	Subject to CA - Discretion	Subject to CA - Non-TSD
-----	-----	-----	---S-	N	Y	N	Y	N

Compliance, Monitoring and Enforcement and GPRA Universes							
Full Enforcement	Operating TSDF	SNC	BOYSNC	GPRA Permit	GPRA Postclosure	GPRA CME	GPRA CA
-----	-----	N	N	N	N	N	N

Source Summary Table				
Act Loc	Source	Sequence	Receipt Date	Non-notifier
MI	A	1	11/16/1980	
MI	** I	1	7/31/1995	
MI	N	1	8/6/1980	
MI	R	6	2/15/2000	
MI	R	5	2/26/1998	
MI	R	4	2/28/1996	
MI	R	3	2/7/1994	
MI	R	2	2/21/1992	
MI	R	1	2/21/1990	

Add Site Identification Form

RCRA Site Detail Report

Universe Justification

Create New Activity Location

Go To

URL: /Handler2/HAND_main.asp

MAPS
Draw New Map
Current Map
Map Settings
Mail Map

ROUTES
Plan A Route

YELLOW PAGES
Name Search
Category Search

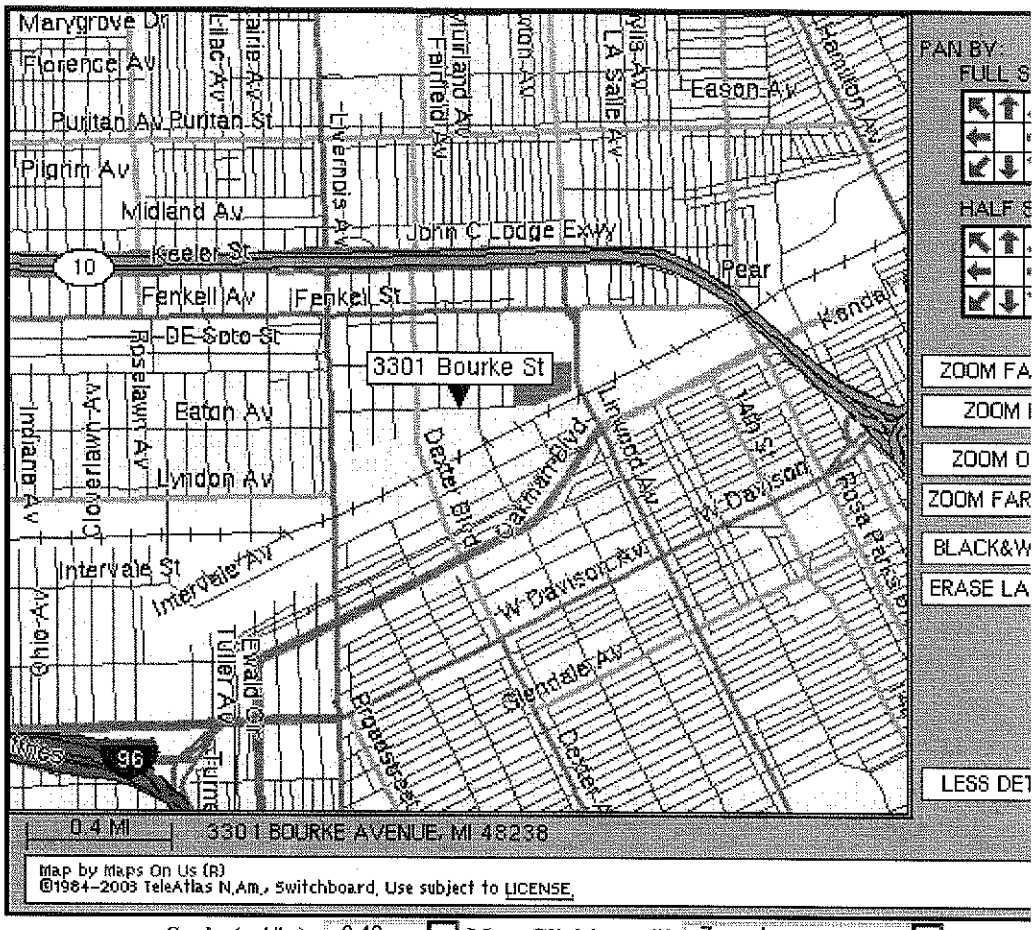
ADDRESS BOOK
My Addresses

TOOLS
Register
General Options

SWITCHBOARD SERVICES
Find a Person
Find Email

HELP FAQ
CONTACT US

Be really, really, really, picky. match.com Are you matching?
I am a M seeking F between 18 and 35 Go



Scale (mi/in): 0.40 Map-Clicking will: Zoom In

REDRAW MAP | WHAT'S NEARBY? Explain Map Operat

Problems printing? Get a Printable Map.

proflowers.com
Freshest flowers direct from the grower.
One dozen roses now only $29.99
Save 30 - 55% today!

Home | About Us | Contact Us | Link To Us | Advertise | Policies

data by ACXIOM

Map data copyright Tele Atlas North America, Inc, 1984-2003; use subject to license agree

Copyright © 1996-2003 Switchboard Incorporated. All Rights Reserved.
Switchboard is a registered service mark of Switchboard Inc.

View photos of Singles
Click here to get started
match.com

MAPS
Draw New Map
Current Map
Map Settings
Mail Map

ROUTES
Plan A Route

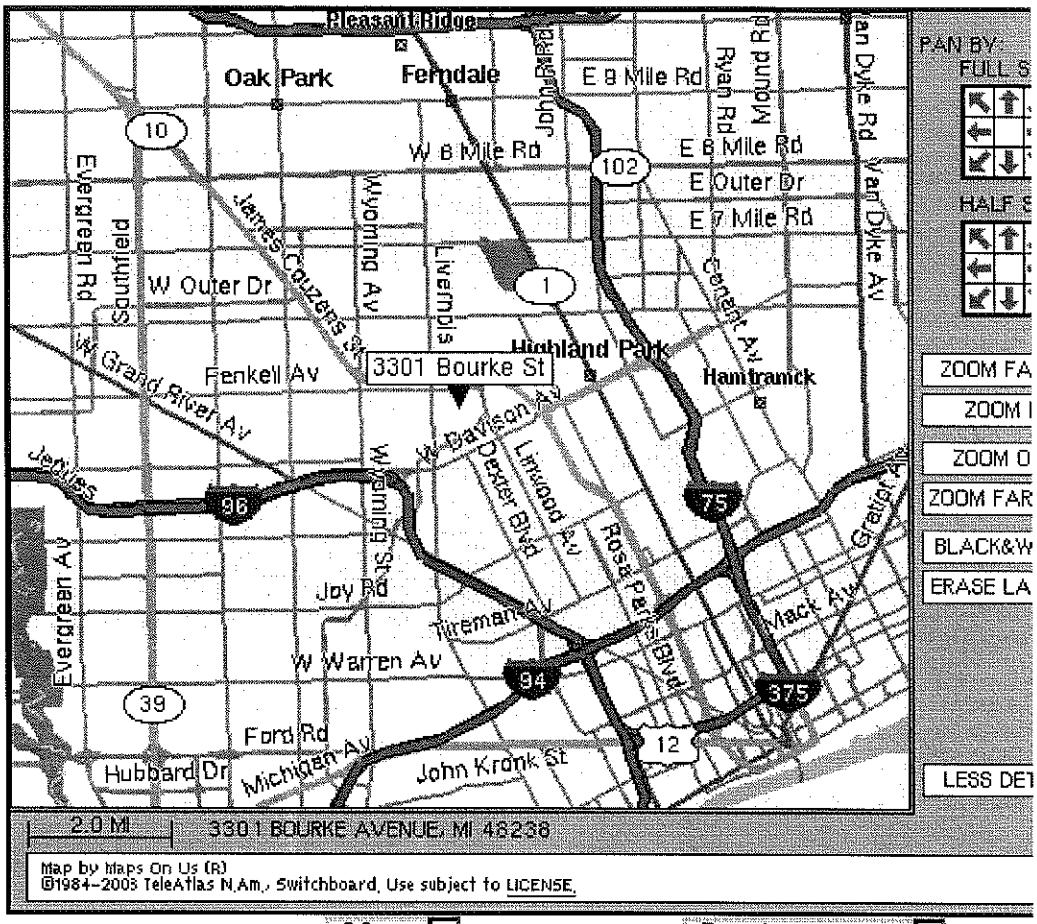
YELLOW PAGES
Name Search
Category Search

ADDRESS BOOK
My Addresses

TOOLS
Register
General Options

SWITCHBOARD SERVICES
Find a Person
Find Email

HELP FAQ
CONTACT US



Scale (mi/in): 2.0 **Map-Clicking will:** Zoom In

REDRAW MAP | WHAT'S NEARBY? | Explain Map Operat

Problems printing? Get a Printable Map.

Home | About Us | Contact Us | Link To Us | Advertise | Policies

data by ACXIOM

Map data copyright Tele Atlas North America, Inc, 1984-2003; use subject to license agree

Copyright © 1996-2003 Switchboard Incorporated. All Rights Reserved.
Switchboard is a registered service mark of Switchboard Inc.

RELEASED
DATE 2/7/10
RIN #
INITIALS

ENFORCEMENT CONFIDENTIAL

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Mary Wojciechowski
Date: March 13, 1992

RECEIVED
RECORD CENTER
OCT 13 1995

Background Facility Information

Facility Name: BASF Corporation
EPA Identification No.: MID 007 138 746
Location (City, State): Detroit, Michigan
Facility Priority Rank: Low

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire Facility - 13 SWMUs

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

( ) No corrective action activities initiated (Go to 5)
(X) RCRA Facility Assessment (RFA) or equivalent completed
( ) RCRA Facility Investigation (RFI) underway
( ) RFI completed
( ) Corrective Measures Study (CMS) completed
( ) Corrective Measures Implementation (CMI) begun or completed
( ) Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

( ) Operating permit
( ) Post-closure permit
( ) Enforcement order
(X) Other (Explain)

Numerous corrective actions have been taken in response to past releases to air.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

(X) Yes
( ) No
( ) Uncertain; still underway
( ) Not required

Additional explanatory notes:

Corrective actions taken in response to past releases to air have been successful

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

( ) Ground water
( ) Surface water
(X) Air
( ) Soils

6. Are contaminant releases migrating off-site?

( ) Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater: _____
Surface water: _____
Air: _____
Soils: _____

(X) No
( ) Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

( ) Yes (Go to 8a)
(X) No
( ) Uncertain

Additional explanatory notes:

There is no evidence to show that contaminants are currently being released from the facility

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

There is no evidence to show that contaminants are currently being released at the facility

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

( ) Yes (Go to 9)
(X) No
( ) Uncertain

Additional explanatory notes:

There is no evidence to show that contaminants are currently being released at the facility

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

There is no evidence to show that contaminants are currently being released at the facility

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

   (X) Yes
   ( ) No
   ( ) Uncertain

   Additional explanatory notes:

There is currently no evidence of a threat.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

    ( ) Yes
    (X) No
    ( ) Uncertain

    Additional explanatory notes:

There is currently no evidence of any risk.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

    ( ) Yes
    (X) No
    ( ) Uncertain

    Additional explanatory notes:

There is currently no need for stabilization.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

    ( ) Solid
    ( ) Light non-aqueous phase liquids (LNAPLs)
    ( ) Dense non-aqueous phase liquids (DNAPLs)
    ( ) Dissolved in ground water or surface water
    (X) Gaseous
    ( ) Other _____

13. Which of the following major chemical groupings are of concern at the facility?

    (X) Volatile organic compounds (VOCs) and/or semi-volatiles
    ( ) Polynuclear aromatics (PAHs)
    ( ) Pesticides
    ( ) Polychlorinated biphenyls (PCBs) and/or dioxins
    ( ) Other organics
    ( ) Inorganics and metals
    ( ) Explosives
    ( ) Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

( ) Yes; Indicate possible course of action.

_____
_____
_____
_____
_____
_____

(X) No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

There is no evidence to show that contamination exists at this facility.

_____
_____
_____
_____

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes
( ) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

( ) Yes
( ) No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

( ) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

_____
_____
_____
_____
_____
_____

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

( ) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

_____
_____
_____
_____
_____
_____

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

( ) Yes
( ) No, not feasible
(X) No, not required

Explain final decision, using additional sheets if necessary.

Corrective actions taken in response to past releases to air have been successful. There is currently no evidence to show that contamination exists at the facility.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

RECEIVED
WMD RECORD CENTER
JAN 03 1995

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

BASF CORPORATION
DETROIT, MICHIGAN
MID 007 138 746

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	MID 007 138 746
Date Prepared	:	April 22, 1993
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032MI01
Prepared by	:	PRC Environmental Management, Inc. (Deborah Lyne) (Patricia Murphy)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

contains recycled fiber and is recyclable

TABLE OF CONTENTS

Section — Page

EXECUTIVE SUMMARY ES-1

1.0 INTRODUCTION 1

2.0 FACILITY DESCRIPTION 4

2.1 FACILITY LOCATION 4
2.2 FACILITY OPERATIONS 4

2.2.1 Paint Plant 9
2.2.2 Resin Plant 9
2.2.3 Clear Coat 11
2.2.4 Other Processes 11

2.3 WASTE GENERATING PROCESSES 12
2.4 RELEASE HISTORY 14
2.5 REGULATORY HISTORY 18
2.6 ENVIRONMENTAL SETTING 21

2.6.1 Climate 21
2.6.2 Flood Plain and Surface Water 22
2.6.3 Geology and Soils 22
2.6.4 Ground Water 25

2.7 RECEPTORS 25

3.0 SOLID WASTE MANAGEMENT UNITS 29

4.0 AREAS OF CONCERN 40

5.0 CONCLUSIONS AND RECOMMENDATIONS 41

REFERENCES 47

Attachments

A VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

B VISUAL SITE INSPECTION FIELD NOTES

LIST OF TABLES

Table		Page
1	SOLID WASTE MANAGEMENT UNITS (SWMU)	7
2	SOLID WASTES	15
3	SWMU SUMMARY	42

LIST OF FIGURES

Figure		Page
1	FACILITY LOCATION	5
2	FACILITY LAYOUT	6
3	GEOLOGIC STRUCTURE SECTION	23
4	DISTRIBUTION OF PERMEABLE SURFACE DEPOSITS IN SOUTHEAST MICHIGAN	24
5	REPRESENTATIVE GEOLOGICAL CROSS SECTION OF THE DETROIT AREA	26
6	SURFICIAL GLACIAL FEATURES OF THE DETROIT RIVER AREA	27

RELEASED
DATE 3/7/00
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the BASF Corporation (BASF) facility in Detroit, Michigan. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from the SWMUs identified.

The BASF facility is an automotive paint, resin, and clear coat manufacturing plant located on 20.75 acres in a mixed industrial and residential area of Detroit, Wayne County, Michigan. The facility has been manufacturing automotive paints since 1913, initially as Cook Industrial Coatings, and from 1982 to 1985 as Glasurit America, Inc. In 1985, Glasurit merged with BASF Inmont to form BASF Corporation.

From 1980 to 1984, the facility operated under an interim status permit as a treatment, storage, and disposal facility. During that time, two spent solvent recycling stills were in operation, in addition to the automotive paint manufacturing done at the plant. The closure of one still was approved by EPA in 1984; the other still was taken out of operation in 1986. Since 1984, the facility has been a large-quantity generator that stores hazardous wastes for fewer than 90 days.

The Wayne County Department of Public Works Air Pollution Control Division (APCD) regulates air emissions from the facility. At the last inspection, the BASF facility had 93 certificates of operation for its equipment.

BASF currently generates several waste streams at the facility, including a variety of hazardous wastes. Hazardous wastes managed at the facility include ignitable spent adsorbents (EPA Hazardous Waste Code D001); filtration media and other solids (D001); waste filter paper and filter aid (D001); ignitable spent solvents (F003, F005, and D001); overstocked, out of date paints and resins (D001); waste paints and resins (D001); rinse water (D001); and resin/water solvent mixtures (D001).

The PA/VSI identified 13 SWMUs at the facility; no AOCs were identified. The SWMUs are:

Solid Waste Management Units

1. Former Reclamation Area
2. Tank Farm
3. Reactor Catch Tank
4. Resin Wastewater Storage Tank
5. Portable Tank Cleaning Area
6. Wastewater Treatment Unit
7. Caustic Cleaning Area
8. Small Container Storage Area
9. Bailer-Crusher Pad
10. Central Drum Storage Area
11. Satellite Accumulation Areas
12. Paint Waste Staging Area
13. Resin Waste Staging Area

The potential for releases of hazardous wastes or constituents to the ground water from SWMUs at the facility is low except for SWMU 6. Most of the SWMUs are located indoors and now have some form of secondary containment. Although SWMU 6 is located indoors on a concrete surface, it does not have secondary containment and therefore poses a moderate potential for release. BASF has a wastewater treatment operation that discharges to a local publicly owned treatment works (POTW). SWMUs 2, 9, and 10 are located outdoors; however, their containment is sound. Most of the processing area of the facility is paved and has controlled drainage manholes that lead to the POTW. According to the Detroit Water and Sewerage Department ground water is not used in the area; instead, water for drinking and industrial purposes is drawn from the Detroit River.

Two spills reported by the facility might have resulted in releases to surface water. In 1986, a xylene spill of 300 to 400 gallons occurred at the tank farm (SWMU 2). The waste was released through the sewer system to the POTW. The release was caused by a valve to the sewer being left open. The corrective measures the facility took included (1) adding a lockout device to the feed tank and (2) installing a new overfill cutoff system at the tank. A xylene spill from a reactor in 1990 released 1,500 pounds to the sewer system and POTW. The facility changed the gradient of the floor in the reactor room and plugged the floor drains. On June 28, 1990, about 1,000 pounds of propylene oxide and 10 pounds of propylene glycol were released to the air and sewer system, respectively. In all three incidents, should the POTW have failed to contain the

RELEASED
DATE 3/7/00
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

spill, releases would have occurred to the Detroit River. The current potential for release of hazardous wastes or constituents to the surface water is low. The closest surface waters, the Detroit River and the River Rouge, are both more than 4 miles from the facility.

The potential for releases to air is moderate. The file review revealed seven incidents of documented releases to air. In each incident, the facility took corrective measures to reduce the possibility of recurrence. All active SWMUs that manage volatile wastes at the facility are indoors and have some form of secondary containment.

The potential for releases to on-site soil is low. The facility's underground storage tanks, with the exception of two, have been either removed or filled in. Of the two remaining underground storage tanks, one is inactive and the other is used to store coolant water. No evidence of releases from the tanks has been found in the records. The current SWMUs all appear to have sufficient secondary containment to guard against releases of hazardous waste to on-site soils except for SWMU 6.

Possible receptors at the site include nearby residents and site workers. BASF is located in a mixed residential and industrial area. The facility employs approximately 270 people. There are several schools located within a mile of the facility. All activities at the site are conducted on concrete floors (indoors) or on asphalt. Access to the site is limited; a fence surrounds the site and all gates are locked or guarded.

PRC recommends that the facility install secondary containment at SWMU 6. Steps have been taken to prevent the recurrence of releases from SWMU 2. PRC recommends no further action for the remaining SWMUs.

RELEASED
DATE 3/7/00
RIN #
INITIALS MV

ENFORCEMENT
CONFIDENTIAL

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) programs are working together to identify and address RCRA facilities that have high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of setting priorities among facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential release(s) to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, whether or not the unit was intended to manage solid or hazardous waste.

Units that fall within the definition of a SWMU include:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents -- for example, an area where a wood preservative has dripped, a loading and unloading area, or an area where solvent used to wash large parts has dripped continually onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine and nonsystematic

basis. This includes any area where the possibility of such a release in the future is considered strong.

The purpose of the PA is to:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI.

The PA includes a review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is to:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the BASF Corporation facility (BASF) in Detroit, Michigan. The PA was completed on October 15, 1991. PRC gathered and reviewed information from the Michigan Department of Natural Resources (MDNR) and from EPA Region 5 RCRA files. The VSI was conducted on November 6, 1991. It included interviews with one

facility representative and a walk-through inspection of the facility. Thirteen SWMUs were identified at the facility; no AOCs were identified.

The VSI is summarized and seven inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

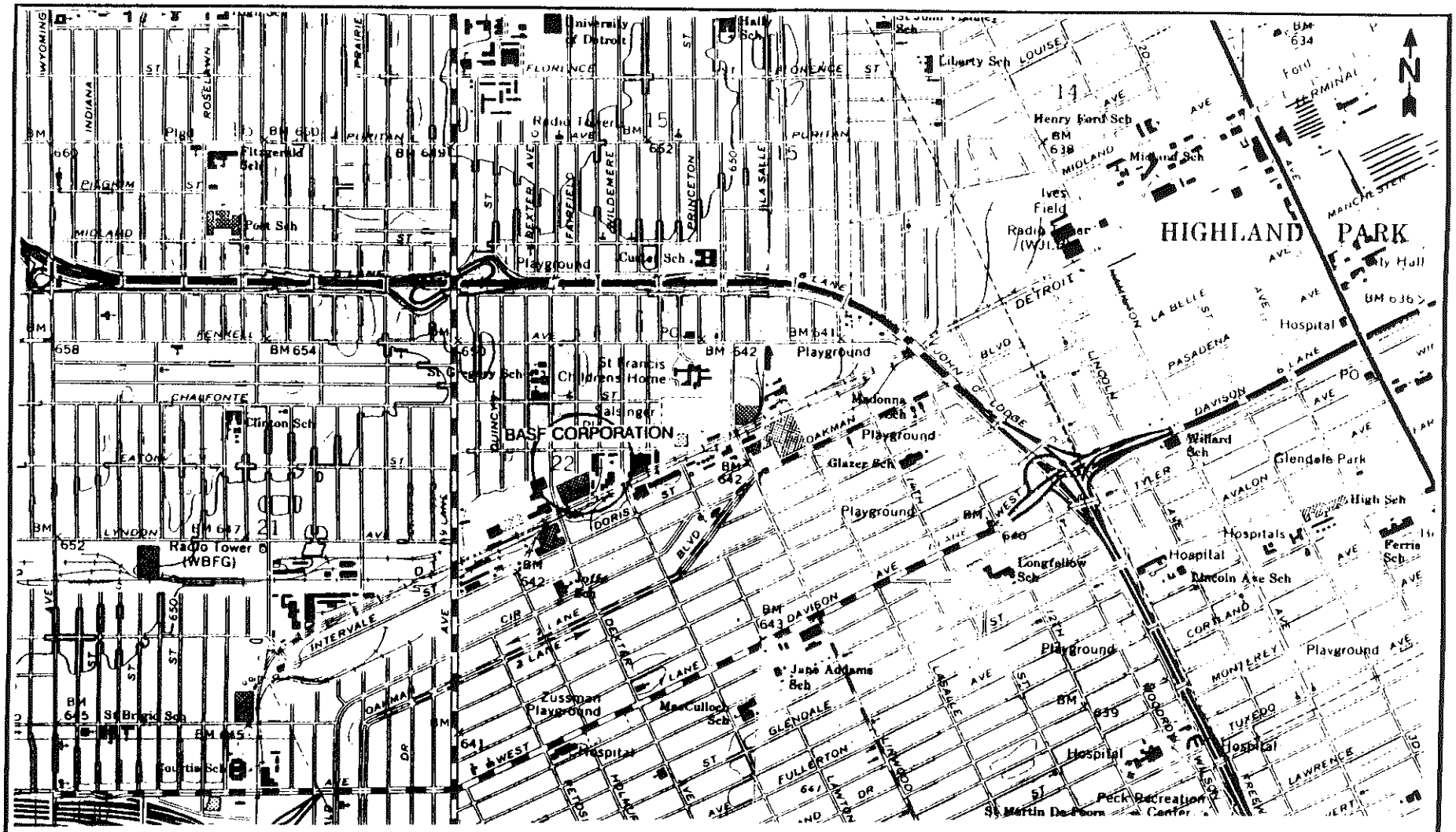
2.1 FACILITY LOCATION

The BASF facility is located at 3301 Bourke Avenue in western Detroit, Wayne County, Michigan (latitude 42°23'56" N; longitude 83°07'59" W). The facility occupies 20.75 acres in a mixed industrial and residential area. It is bordered on the north by Bourke Avenue, on the east by Wildemere Street, on the south by the C & O Railway, and on the west by Dexter Avenue. There are residences and schools within 1 mile of the facility. Figure 1 illustrates the location of the BASF facility.

2.2 FACILITY OPERATIONS

Akron Varnish Company owned the facility from 1907 to 1923. In 1923, Cook Industrial Coatings, Inc. (Cook), bought the facility and operated it until 1980, when its name was changed to Glasurit America, Inc. (Glasurit, 1982). On December 31, 1985, Glasurit merged with BASF Inmont Corporation and became BASF Corporation (Glasurit, 1985b). BASF currently employs approximately 270 people in the manufacture of paint, resins, and clear-coating material for the automotive industry. Figure 2 shows the layout of the facility. Table 1 lists the SWMUs identified at the BASF facility and their current status.

Cook manufactured paints, varnishes, miscellaneous coatings, and resins at the facility. The Cook site was a treatment, storage, and disposal facility (TSDF), as well as a generator, until its closure in 1984. During this period, the facility operated two solvent recycling stills. A firm call Nortru, Inc., owned by Norm Foster, accepted spent solvent wastes from off-site generators for recycling in the larger of the two stills. Spent solvents were transported in drums or bulk tanks to the site from off-site generators and were stored in aboveground tanks in building 20A (SWMU 1). Building 20A contained 19 tanks: 10 for spent solvents, 2 for still bottoms, and 7 for storage of solvents reclaimed by the Nortru-owned still. The spent solvents were stored for as long as a year before they were recycled (MDNR, 1982a). Only limited information is available about Nortru's solvent recovery operations. File information indicates that reclaimed solvents



SCALE 1:24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

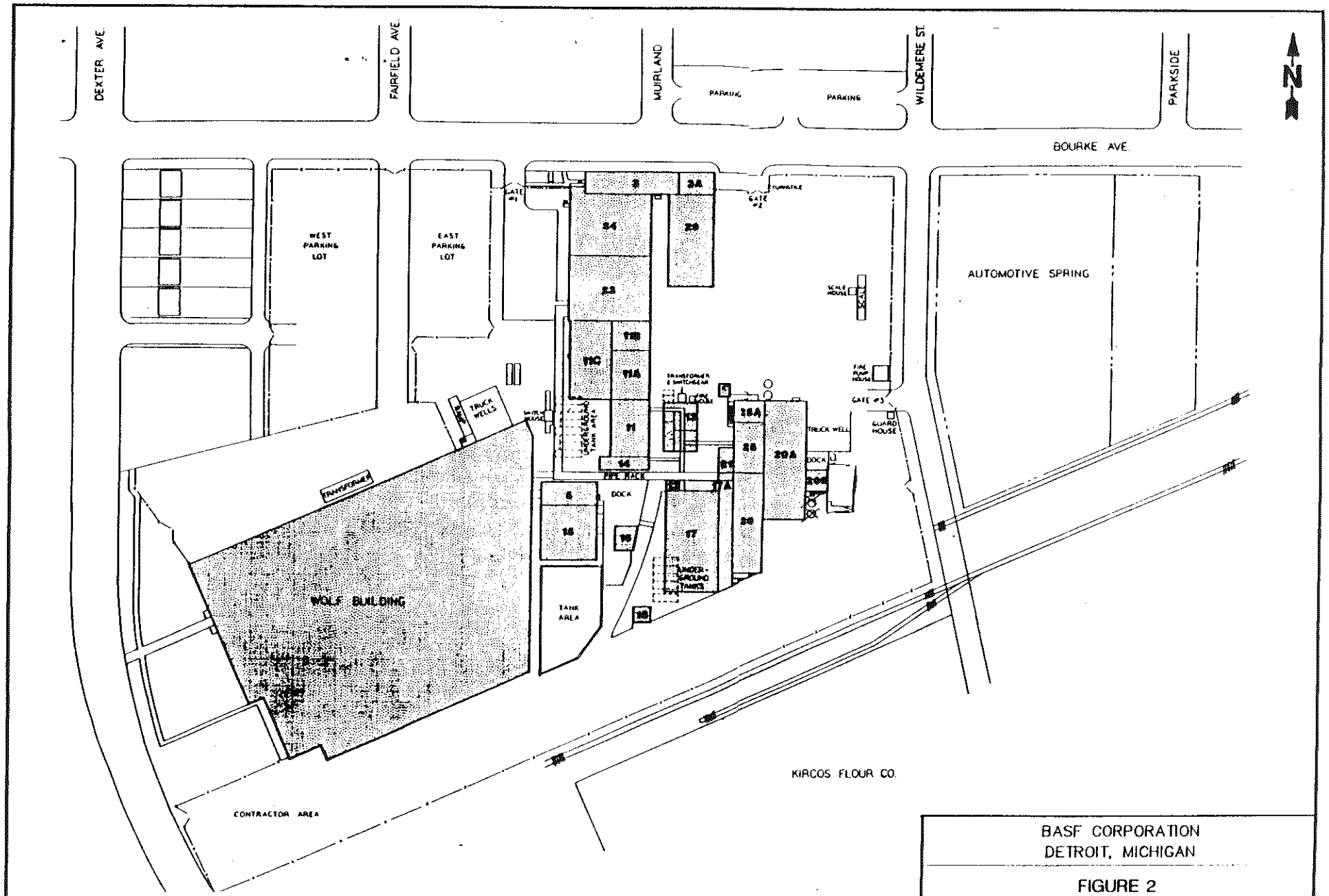
SCALE: 1" = 2,000'

SOURCE: USGS, 1981, 1983

BASF CORPORATION
DETROIT, MICHIGAN

FIGURE 1
FACILITY LOCATION

ENVIRONMENTAL MANAGEMENT, INC.



BASF CORPORATION
DETROIT, MICHIGAN

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

NOT TO SCALE

SOURCE: MODIFIED FROM COMMERCIAL STEEL SKETCH, 1980

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Former Reclamation Area	Yes	Inactive
2	Tank Farm	Yes	Active
3	Reactor Catch Tank	No	Active
4	Resin Wastewater Storage Tank	No	Active
5	Portable Tank Cleaning Area	No	Active
6	Wastewater Treatment Unit	No	Active
7	Caustic Cleaning Area	No	Inactive
8	Small Container Storage Area	No	Active
9	Bailer-Crusher Pad	No	Active
10	Central Drum Storage Area	No	Active
11	Satellite Accumulation Areas	No	Active
12	Paint Waste Staging Area	No	Active
13	Resin Waste Staging Area	No	Active

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B Permit.

were transported off site for resale; there was no information in the files about Nortru's procedures for handling waste still bottoms. In 1984, during closure, Nortru stopped accepting wastes from off-site sources and removed the still. The tanks were cleaned and inspected, in accordance with EPA closure regulations.

Cook recycled its spent solvents in a smaller Brighton still separate from the recycling still operated by Nortru. Cook pumped spent solvent from the paint manufacturing operation to three tanks in the tank farm (SWMU 2). The solvent was left to settle and then was piped through a small Brighton still into two receiving tanks. The reclaimed solvent was checked for quality before it was stored in a refined-product tank. The Cook still was operated as part of the paint manufacturing process and was not a regulated unit. It ceased operation in 1986.

Until 1986, the facility had 17 underground storage tanks (UST) that were used to store raw materials and reclaimed solvents. The tanks were between 11,000 and 14,000 gallons in capacity. Of the original 17 underground storage tanks, 8 were adjacent to building 11C, 5 were under and adjacent to building 17, and 4 were under the tank farm (SWMU 2). In November 1986, all material from 15 of the original 17 underground storage tanks was removed, those tanks that were not under a building were removed, and the remaining tanks were filled with fly ash. According to the facility representative, a flame ionization detector was used to test the soil gas and soil samples were taken during removal activities. All testing and sampling results indicated no contamination above the detection limits. In 1987, the facility submitted a closure report to the state, but the state did not send the facility an approval or denial of the closure. There are two remaining USTs; one was used for fuel oil storage and is now empty; the other, under building 11C, is used to store water for a water recirculation system that cools equipment.

At one time, there was a development laboratory in building 24 at the facility. The laboratory was closed in 1989, and its operations were moved to another BASF facility. Other operations at the facility include paint, resin, and clear-coat production. In addition, BASF operates a wastewater treatment system, uses a portable cleaning unit to clean manufacturing equiment, and manages an aboveground storage tank farm. These are discussed in more detail below.

2.2.1 Paint Plant

The paint formulation operations are housed on the first and second floors of buildings 11A, 11C, 23, and 24, and on the first, second, and fourth floors of building 11. This operation occupies about 61,000 square feet of the factory and nominally can produce up to 65,000 gallons each week of finished and intermediate products. The plant operates on two shifts, five days a week.

Paint is manufactured by blending polymer resins, pigments, solvents, and other ingredients. The first step disperses dry pigments into a resin blend. Dry pigments are added in high-shear mixers. The coarse mixture from these units then is fed into dispersion mills to be ground fine. The facility has sand mills, attritor mills, and Netszch mills located on the second floor of the plant and ball mills on the first floor of building 11C. The finished, milled aggregate is called tint paste or blending enamel.

Resins, solvents, and pigment dispersion from the mills are combined in the blending area into formulations for different products. Raw materials for use in this process are piped or fed into one of the 75 blending tanks located on the first floor of the plant. At this point in the process, the mixture is a rough blend of all the ingredients that make up the finished product.

Final adjustments to tint and other characteristics are made in the tinting area. Instructions for these adjustments are developed by the quality assurance laboratory on the third floor of buildings 11 and 11A, and color matching is done by experienced tinters whose work area is on the second floor of building 11B. Tint pastes for this purpose are stored on the second floor of buildings 11A and 11C.

The finished product is filtered into shipping containers. The shipping containers are Department of Transportation (DOT) certified 55-gallon drums, 260- or 575-gallon stainless steel tote tanks, or smaller pails for special orders.

2.2.2 Resin Plant

The resin plant is located in buildings 13, 17, 17A, 20, 21, 25, and 25A. This portion of the facility produces polymers dissolved or suspended in organic solvents. The final product is used as an intermediate for paint production at this or other BASF plants. The plant produces two

types of resins: solution resins and emulsion resins. Solution resins are the more common type and have acrylic, polyester, and, occasionally alkyd, urea formaldehyde, and melamine polymers. They are characterized by a clear, often brown-tinted appearance. The solution resins are produced in a concentrated form in reactors. The facility uses two 30,000 pound reactors, one in building 25 and the other in building 25A. The facility also can produce melamine and urea resins in two 2,500-gallon reactors, housed in building 17, and alkyds in one 2,000-gallon and one 2,500-gallon reactor, also located in building 17. The vapors from the reactors pass out a vent line through a condenser and a catch tank (SWMU 3), where entrained particles are captured and stored in a caustic scrubber which reacts with any residual acrylic monomers. From the scrubber, the vapor is released to the air stack. The material from the catch tank is disposed of off site approximately every three months.

In resin manufacturing, measured amounts of solvent and monomers are heated to boiling point and maintained at a specific temperature. Over time, initiators, such as peroxides, and a second monomer mix are added slowly to achieve the correct proportion of each monomer in each polymer chain. The batch is tested periodically for properties which indicate the degree of completeness of the reaction. When the test results fall within a specified range, the batch is dumped into a thinning tank.

In the thinning tank, the concentrated polymer solution is cooled and thinned. Specific measured quantities of solvent are added to the tank before the concentrate is dumped in. Each reactor has thinning tanks. Typically, the thinning tanks have a volume at least 50 percent greater than that of the reactor; they are equipped with water jackets and condensers to aid in cooling.

After the solutions are adjusted in the thinning tanks, the resins are filtered and piped into tanks, drums, totes, or tank wagons. The facility has three block-type plate and frame filter presses for filtering solution resins. These units use burlap cloth and felt paper filters and are precoated with a diatomaceous earth filter aid. Depending upon its use, a resin might be sent to tanks for high-volume, on-site use, or to portable containers for low-volume or off-site uses. The facility has 72 tanks that have a capacity of 10,000 gallons, and 22 tanks that have a capacity of 5,000 gallons. The tanks are housed in buildings 20, 20A, and 25.

The manufacture of emulsion resins is similar to that of solution resins, except that these formulas initially react in water rather than in solvent. The manufacturing process then requires a phase-separation step, which takes place in two tanks housed in building 20A. The organic phase

is returned to a reactor for blending with other semi-finished resins. The water phase is accumulated in a tank in building 17 (SWMU 4) and sent off site for incineration. The finished resin is not thinned with solvent in a thinning tank.

2.2.3 Clear Coat

This process is similar to the manufacture of paint; resins, solvents, and dispersed solids are blended. The finished product is stored in tanks for short periods of time and is transferred to tank wagons for delivery in bulk.

The most noticeable difference between the manufacture of clear coat and paint formulation is in the composition of the dispersed solids. In clear coat, these include insoluble mineral solids such as mica, or completely soluble materials such as cellulosic or polymeric solids. These are all high-shear, disc-type dispersers.

When the formulation is complete, the batch of clear coat is filtered into tanks and shipped off site in tank wagons. Filtration is done either through a plate and frame filter press or through bag filters, or through both.

2.2.4 Other Processes

A portable tank and lid cleaning unit (SWMU 5) is associated with the manufacturing process. The unit consists of a tank holder, a lid holder, two tanks of "once-used" solvent and one tank of fresh solvent. First, once-used solvent is pumped into the tank for gross cleaning, then the tank is rinsed with fresh solvent. The once-used solvent is pumped from the tank being cleaned through aboveground piping to the spent solvent storage tanks in the tank farm (SWMU 2). The fresh solvent used to clean the tank is drained into the once-used solvent tank and is used for gross cleaning of the next tank.

The facility currently operates a wastewater treatment system (SWMU 6) in building 17. Two aboveground tanks (numbered 131 and 132) are used. Tank 132 (10,000-gallon capacity) receives resin/water solvent mixture from the resin and paint manufacturing areas and holds it for 3 days while the emulsion layer settles out. The water is transferred to tank 131 (11,000-gallon capacity), then pumped into a distillation column and condenser to separate the water and the butyl alcohol. The water then is returned to tank 131 for retreatment. The recovered butyl

alcohol is sent to a sister site, refined, and returned for reuse. The distillation column condenser system reduces the ethyl benzene level in the wastewater to the organic chemicals, plastics, and synthetic fibers (OCPSF) limits. The wastewater then is discharged to the sewer system. At the time of the VSI, the condenser was not functioning, and all wastewater was being put in drums and disposed of off site by Laidlaw Disposal.

The tank farm (SWMU 2) contains 21 aboveground tanks, of which three are used for storage of spent solvents and the remaining 18 contain raw materials and monomers. The raw material piping is underground, and the monomer and spent solvent piping is aboveground. Spent solvents are piped to the three tanks in the tank farm from the paint and resin manufacturing area and the portable tank cleaning area (SWMU 5) in building 16. The spent solvent is pumped out of the tanks three times a week, and taken off site by Petro-Chem for reclamation.

Building 15 (SWMU 7) contains a 250-gallon tank formerly used for caustic cleaning of the tank parts and equipment. The spent cleaner was neutralized and discharged to the sewer system. This unit ceased operation in 1989. The facility now uses a portable tank cleaner which uses solvent as a cleaning agent. The portable system is located in building 16 (SWMU 5). The spent solvent from the tank cleaner is pumped to the spent solvent tanks in the tank farm (SWMU 2).

2.3 WASTE GENERATING PROCESSES

During the period before 1984 when the facility operated as both a TSDF and a generator, the wastes generated included 1) still bottoms; 2) ignitable wastes from resin production; and 3) spent solvent wastes that could not be reclaimed on site, such as 1,1,1-trichloroethane and tetrahydrofuran. The wastes were stored on the site for up to a year before being taken off site for disposal (MDNR, 1982a). Most of the waste currently generated is spent solvents from cleaning the tanks and equipment and filtering the paints and resins.

Miscellaneous empty containers such as pails, buckets, and damaged drums that cannot be reconditioned are stored in building 5 (SWMU 8). The containers are crushed, bailed (SWMU 9), and disposed of off site. A pan under the bailer collects any drips or residue, which also is put in drums and taken to the central drum storage area (SWMU 10) for off-site disposal.

The facility operates 10 satellite accumulation areas throughout the plant (SWMU 11) including one in the quality assurance laboratory. They are labeled drums in which small amounts of waste are placed. When the drums are full, they are covered and taken to one of the two staging areas (SWMU 12 and 13). From the staging areas, the drums routinely are taken to a central drum storage area (SWMU 10).

In its 1989 hazardous waste report (BASF, 1989b), BASF listed the following wastes and descriptions:

1) Ignitable spent adsorbents containing paints and resins originally including methyl ethyl ketone, xylene, butyl alcohol, other nonhalogenated solvents, and barium, chrome, and lead compounds (EPA Hazardous Waste Code D001) used in adsorbing various raw materials, wastes, and products.

2) Filtration media and other solid objects saturated with ignitable paints containing methyl ethyl ketone, xylene, butanol, glycol ethers, other nonhalogenated solvents, barium, lead, and chrome compounds (D001) used in filtering the paints, resins, and clear coats.

3) Waste filter paper and filter aid from block plate and frame filter presses saturated with ignitable solution resins containing butyl alcohol, xylene, and aromatic petroleum (D001) used in filtering the paints, resins, and clear coats.

4) Ignitable spent solvent from tank and equipment cleaning containing methyl ethyl ketone, xylene, butyl alcohol, acetone, glycol ethers, and other nonhalogenated solvents, and barium, lead, and chrome compounds (F003,F005, and D001).

5) Out-of-date waste urethane resin, ignitable and reactive (D001) from raw material and product storage areas.

6) Ignitable waste resins, paint, and intermediates removed from inventory because they were off specification, obsolete, or out of date; these waste resins contain butanol, xylene, ethyl benzene, glycol ethers, and barium, lead, and chrome compounds (D001).

7) Waste ignitable paint from filtration and quality-control sampling and testing. Waste includes methyl ethyl ketone, butyl alcohol, xylene, glycol ethers, and other nonhalogenated solvents (D001).

8) Waste liquid solution resins drained from filtration, sampling, and quality-control testing, containing butyl alcohol, xylene, and aromatic solvents making waste ignitable (D001).

9) Ignitable rinsewater from cleaning tanks and equipment from waterborne paint production (new waste in 1989), containing methyl ethyl ketone, glycol ethers, and barium compounds (D001).

10) Solvent-saturated resin/water mixture from liquid/liquid extraction process in wastewater treatment system, containing butyl alcohol, xylene, and aromatic petroleum (ignitable) (D001).

Table 2 identifies the solid wastes managed at the facility and lists their sources and the units in which they are managed.

2.4 RELEASE HISTORY

Several releases have occurred at the facility, some of which were identified during the PA. The first release occurred in 1986, when a 300- to 400-gallon xylene spill occurred in the tank farm (SWMU 2). The facility recently had discharged water to the sewer system from the tank farm, and the valve had been left open. The xylene was released to the sewer system through the open valve (PRC, 1991b). The files contained no record of a response to the spill. A second release occurred on March 14, 1989, when 350 gallons of spent solvent spilled from a tank in the tank farm (SWMU 2). BASF reported the release to the National Response Center, the Michigan Pollution Alerting System, and the local emergency planning commission. BASF subsequently sent a letter to MDNR explaining that a tank overfill occurred while spent solvents were being pumped from a remote source that circumvented the tank's overfill prevention system. BASF took the following steps to prevent a similar spill from occurring: 1) added a lockout device to the feed tank and 2) installed a new overfill cutoff system at the tank. The spill was contained by the tank farm containment device (SWMU 2) and wastes recovered from the spill were sent off site for incineration (BASF, 1989a).

In 1990, a resin-and-solvent material containing xylene and polymers spilled during the charging of a reactor. The unit overflowed when a bolt became caught in the reactor manifold. The fluid spilled into a venting system that discharges to the sewer; normally, the fluid would have flowed to a second reactor. About 1,500 pounds of the solvent were never recovered (PRC, 1991b). The files contained no record of the spill. During the summer of 1991, a 15-gallon spill of spent xylene solvent occurred in the tank farm, staining the side of a tank. The spill was contained in the tank farm (PRC, 1991b). The files contained no record of the spill.

A review of the Wayne County Department of Public Works Air Pollution Control Division (APCD) files revealed the following documented releases.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Ignitable spent adsorbents/D001	Tank and equipment cleaning	SWMUs 8 through 13
Filtration media and other solids/D001	Resin filtration, quality control laboratory	SWMUs 8 through 13
Waste filter paper and filter aid/D001	Paint block plate and frame filter presses	SWMUs 8 through 13
Ignitable spent solvent/F003, F005, D001	Tank and equipment cleaning	SWMUs 1, 2, 3, and 5 through 13
Overstock, out-of-date paints and resins/D001	Paint and resin production	SWMUs 8 through 13
Ignitable waste paints and resins/D001	Filtration quality control laboratory	SWMUs 8 through 13
Ignitable rinsewater/D001	Cleaning waterborne paint production tanks and equipment	SWMUs 4, 5, 6, and 8 through 13
Resin/Water Solvent mixture/D001	Liquid/liquid extraction process of wastewater treatment system	SWMUs 4 and 6
Waste liquid resin solution/D001	Filtration, quality control operations	SWMUs 4 through 13

Note:

* Primary management units refers to a SWMU that currently manages the waste.

On May 4, 1981, APCD notified Cook of a violation (Violation Notice No. 41980) of Article VI, Section 6.6 of the Wayne County Air Pollution Control Regulations (APCR) and required Cook to take precautions immediately to eliminate escape of air contaminants from the tank truck unloading system (APCD, 1981a). Cook responded that it would use a neutralizer for ethyl acrylate in the future (Cook, 1981); in a follow-up inspection, no odor was detected by APCD.

On June 25, 1981, APCD received a complaint that bad odors had come from the BASF facility on June 24, 1981. In a telephone conversation with APCD, a BASF representative explained that the release occurred when an employee operated a process vertical condenser which was vented incorrectly, causing ethyl acrylate to be released into the air (quantity not recorded in the files). The operator shut down the equipment; subsequent cleanup procedures caused the release of more fumes (APCD, 1981b). No further reference to the release was found in the files.

On September 16, 1982, APCD received a complaint and notified Cook of a violation (Violation Notice No. 43645) of Article VI, Section 6.6 of the APCR. APCD required Cook to take precautions immediately to eliminate escape of air contaminants from the liquid waste system into the area sewer system (APCD, 1982). APCD inspected the sewers at the facility on May 10, 1983. That inspection revealed that someone had dumped solvent into the water-holding tank (quantity not recorded in the files). A facility representative stated that he would mark the tank to prevent a recurrence (APCD, 1983). Glasurit responded to Violation Notice No. 43645 on August 19, 1983, explaining that the reported odor came from a wash drum at the facility. Spillage around the drum would collect and decompose before being washed down the sewer during rain storms. The decomposed material was odorous, giving rise to the odors reported as coming from the sewers. The facility corrected the matter by cleaning the area and filling it with gravel so any spills would go immediately to the sewer, rather than collecting and decomposing in the area (Glasurit, 1983). No further reference to the release was found in the files.

On January 16, 1986, APCD received a complaint that odors were coming from the plant. The facility was inspected, and it was determined that an air emission with an intensity rating of #2 odor level had occurred. APCD issued a Violation Notice (No. 46836) (APCD, 1986). Glasurit responded in writing on February 7, 1986, explaining that the release occurred during the unloading of a shipment of 2-ethyl hexyl acrylate. The pump usually used for unloading was not operating, so the pump on the truck was used. That pump leaked, and the leak led to the spill, which entered the sump and then the sewer (quantity not recorded in the files). To prevent a

recurrence, BASF has instructed employees no longer to use any leaking pumps, and BASF will purchase blankets of absorbent material for use in the drainage troughs and sumps (BASF, 1986). No further reference to the release was found in the files.

On August 10, 1987, APCD completed an inspection report form that made reference to a spill on August 9, 1987 of N-butyl acrylate (quantity not recorded in the files). All the spilled chemical had been cleaned up on the day of the spill and disposed of off site. The form indicated that an annual inspection was scheduled for August 12, 1987 (APCD, 1987a). No further reference to the release was found in the files.

On September 18, 1987, the Detroit Fire Department issued a Notice of Violation (No. 63216), requiring BASF to repair the relief valve on a low pressure boiler. The valve had caused a release of Dowtherm J, a heat transfer liquid media made up primarily of diethylbenzene, from the boiler (quantity not recorded in the files). BASF also was requested to provide a closer for the door leading to the boiler room (Detroit Fire Department, 1987). Facility representatives stated that the release occurred because the pressure cutoff switches were plugged with foreign matter. The facility engaged a professional cleaning company to clean the boiler, installed an independent pressure and temperature recorder, established a preventive maintenance schedule including daily inspection and weekly sampling for contamination, and installed a door closer (BASF, 1987b). No further reference to the release was found in the files.

On June 28, 1990 at the BASF facility, there was a release of approximately 1,000 pounds of propylene oxide (Chemical Abstract System No. 75-56-9) to the air with a minor release (less than 10 pounds) to surface water through the sewer system. That same day, BASF verbally notified MDNR's Lansing Environmental Response Division and the National Response Center of the release. On July 3, 1990, BASF sent MDNR written notification of the release, outlining the cause of the release and the corrective action taken. The release was caused by the failure of a gasket between a reactor and its nozzle while propylene glycol was being added to the reactor. All reactors were shut down and the deluge system was activated. The reactor was vented through the roof vent, and the propylene oxide remaining in the reactor was evacuated to the scrubber. Subsequently, BASF replaced several gaskets in the reactor and changed the gasket materials in the propylene oxide system (BASF, 1990). No further reference to the release was found in the files.

2.5 REGULATORY HISTORY

On November 17, 1980, Cook submitted to EPA a RCRA Notification of Hazardous Waste Activity and Part A permit application (Cook, 1980a&b) as both a treatment, storage, and disposal facility and a generator. On January 29, 1982, MDNR inspected the facility and found it to be in violation of the personnel training records requirement of RCRA (40 CFR 265.16) (MDNR, 1982b). On February 24, Cook sent a letter to MDNR indicating that the violation had been corrected (Cook, 1982). On March 8, 1982, MDNR confirmed its receipt of the letter and returned Cook to a status of compliance (MDNR, 1982c).

On January 26, 1981, MDNR notified Cook that the company was in violation of Section 3004 of RCRA (42 USC 6924) but that, based upon information acquired in a telephone conversation with a facility representative, MDNR had accepted the explanation for the violation and the corrective action taken. MDNR also notified the facility that no further response was necessary (MDNR, 1981).

On June 13, 1982, MDNR acknowledged Cook's interim status (MDNR, 1982d). On September 21, 1983, MDNR inspected the facility (which by then belonged to Glasurit) and observed the following violations: 1) no inspection log was being maintained (40 CFR 265.15); 2) personnel training records did not include job titles and job descriptions (40 CFR 265.16); 3) the barrel storage area for paint waste did not have adequate aisle space (40 CFR 265.35); 4) barrel storage practices did not prevent damage to barrels (40 CFR 265.173); 5) Cook's contingency plan lacked a physical description of emergency equipment (40 CFR 265.52); 6) no operating record was kept for the barrels of waste generated by Glasurit (40 CFR 265.73); 7) no closure plan was available for inspection (40 CFR 265.112); 8) not all facility records were available for inspection because of the deficiencies specified above (40 CFR 265.74); 9) ignitable waste was stored less than 50 feet from the plant property line (40 CFR 265.176); 10) barrels and containers were not marked with the accumulation date or with the words "hazardous waste" (40 CFR 262.34); and 11) the barrel storage facility was not provided with impervious secondary containment (Part V Rules of Act 245, the Michigan Water Resources Act of 1929, as amended) (MDNR, 1983a). Glasurit responded to MDNR and addressed all violations by January 26, 1984 (Glasurit, 1984a&c).

On January 6, 1984, Glasurit submitted a closure plan to EPA regarding closure of the hazardous waste facility (Glasurit, 1984b). On May 25, 1984, EPA approved the closure plan and requested certification of closure once completed (EPA, 1984a). Glasurit submitted certification

of closure to EPA on May 30, 1984 (Glasurit, 1984d). EPA confirmed receipt of the certification of closure and released Glasurit from financial requirements on June 19, 1984 (EPA, 1984b).

On February 7, 1985, MDNR again inspected the facility. The following violations were found during the inspection: 1) several drums of hazardous waste were not marked with the date of accumulation (40 CFR 262.34); 2) the hazardous waste accumulation tank was not marked with the words "hazardous waste" (40 CFR 262.34); 3) daily and weekly inspections of the hazardous waste tank were not being conducted (40 CFR 265.194); 4) employee training descriptions were inadequate (40 CFR 265.16); 5) contingency plans had not been submitted to local agencies (40 CFR 265.53); and 6) manifest files contained a copy of a manifest that should have been forwarded to MDNR (MDNR, 1985a). Glasurit responded with a letter documenting the actions taken to correct the violations (Glasurit, 1985a). In response, MDNR accepted the steps taken to correct the violations (MDNR, 1985b).

On July 23, 1987, MDNR inspected the facility, which by then belonged to BASF. The following violations were identified: 1) manifests were not signed by the generator (Act 64, R299.9304, Michigan's Hazardous Waste Management Act of 1979); 2) accumulation dates and hazardous waste codes were not marked clearly on storage containers (Act 64, R299.9306); 3) containers storing hazardous wastes were not marked with the words "hazardous waste" (Act 64, R299.9306); 4) many of the drums observed were not stored closed (40 CFR 265.173); 5) because repainting was being done, storage tanks were not labeled with the words "hazardous waste" (40 CFR 262.34); 6) the indoor tank was not located in an area that provided the required secondary containment (Act 64, R299.9615); and 7) updated RCRA training had not been held (MDNR, 1987a). BASF responded to the list of violations by discussing changes in the instructions for completing waste manifests and by indicating that its response to the other violations would be delayed (BASF, 1987a). MDNR accepted BASF's waste manifest instruction changes (MDNR, 1987b). BASF responded to the remaining violations by outlining the steps taken to correct the violations (BASF, 1987c).

In response to the reported spill of spent solvent on March 14, 1989 (see Section 2.4 above), the Detroit Department of Health inspected the facility on May 2, 1989. No violations were observed during the inspection (Detroit Department of Health [DOH], 1989).

On September 11, 1989, MDNR notified BASF of discrepancies found in manifests for shipments to Illinois. MDNR outlined the requirements for out-of-state shipments and requested

that BASF submit copies of all earlier manifests for out-of-state shipments (MDNR, 1989a). On October 9, 1989, MDNR acknowledged receipt and acceptance of BASF's compliance regarding wastes shipped out of the state (MDNR, 1989b).

On February 6, 1991, an anonymous complaint was recorded on a PEAS (definition of acronym unknown) Incident Report Form for the BASF facility. The complaint indicated that approximately fifty 55-gallon drums at the BASF facility had no hazardous waste labels and no start date of accumulation on them. The action recommended on the form was a routine hazardous waste inspection by the City of Detroit Department of Health (Anon., 1991). On February 19, 1991, the Detroit Department of Health inspected the facility and observed the following violations: 1) containers and tanks of hazardous waste were not marked with the words "hazardous waste," the hazardous waste number, and the start date of accumulation; 2) contingency plans were not updated; 3) waste storage tank systems were not designed, constructed, operated, and maintained according to Michigan regulations (Act 207, Michigan Flammable Liquid Regulations); 4) the waste storage system was not diked, paved, curbed, or otherwise enclosed to provide 150 percent secondary containment; 5) because the waste storage system did not meet secondary containment requirements, the facility was required to conduct annual leak tests or develop an annual assessment plan to meet the requirements of the regulations, and these steps had not been taken (40 CFR 264.191 and 264.193); and 6) the waste storage tank system was not upgraded to meet secondary containment requirements before it had been in use for 15 years (40 CFR 265.193) (DOH, 1991a). BASF responded to the notice of violations by outlining the steps taken to comply with the regulations (BASF, 1991). DOH, however, did not consider that all the violations were resolved adequately and requested a response to the remaining violations by June 8, 1991 (DOH, 1991b). No further correspondence on this issue was found in the files.

On July 1, 1991, EPA notified BASF of a violation of RCRA manifest regulations that had been discovered during an inspection of a shipment of hazardous wastes from BASF. EPA requested that BASF submit a written description of the measures taken to ensure that manifest requirements are met in the future. EPA also asked BASF to submit copies of past manifests documenting shipments since January 1, 1991 (EPA, 1991). No further correspondence on this issue was found in the files.

The BASF facility's air emissions are regulated by the Wayne County Department of Public Works, Air Pollution Control Division (APCD). A detailed compliance inspection report from a July 11-12, 1988 APCD inspection of the facility contained copies of 87 certificates of

operation for process equipment. There are certificates for 5 boilers, 12 lab wash stations, 3 cleaning stations, numerous storage and mixing tanks, various mills, spray booths, and other equipment (APCD, 1988).

On December 8, 1985, APCD inspected the facility and issued a Violation Notice (No. 46803) for failure to obtain a permit for installing a clear-coat blending tank (APCD, 1985).

APCD completed an annual inspection of the facility on August 12-13, 1987. Its representatives inspected 96 pieces of equipment (APCD, 1987b).

On December 18, 1989, APCD made an annual equipment inspection at the facility. None of the 76 certificates of operation in force at that time was changed or canceled (APCD, 1989).

In December 1990, BASF notified MDNR of its intent to remove asbestos from the piping throughout the buildings. This was completed by the end of December, 1990 and was verified by MDNR (MDNR, 1990).

BASF currently is permitted as a large-quantity generator of hazardous wastes that it stores for fewer than 90 days.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the BASF facility.

2.6.1 Climate

The climate in Detroit and the surrounding area is characterized by evenly distributed precipitation throughout the year. The average annual precipitation is 30 to 33 inches. Average monthly temperatures range from a high of 72 degrees Fahrenheit (°F) in July to a low of 23°F in January. Weather in the vicinity is controlled by location in relation to major storm tracks and by proximity to, and influence of, the Great Lakes. Typical winter storms bring periods of rain or snow. Summer storms usually pass to the north; they often are associated with brief showers and sometimes thunder showers with high winds. The Great Lakes mitigate most climatic extremes (Erickson, 1990).

Because of the topography of the area, the moist northwest air dries before it reaches the Detroit area. For example, summer showers coming from the northwest often dissipate before reaching Detroit. The winter northwesterly winds bring snow to all of Michigan, but rarely in accumulations of measurable depth in the Detroit area. The southeasterly winds generally contain more moisture. In any season, the area's heaviest precipitation is brought on by southeasterly winds. The one-year, 24-hour rainfall for this area is about 2 inches (NOAA, 1980).

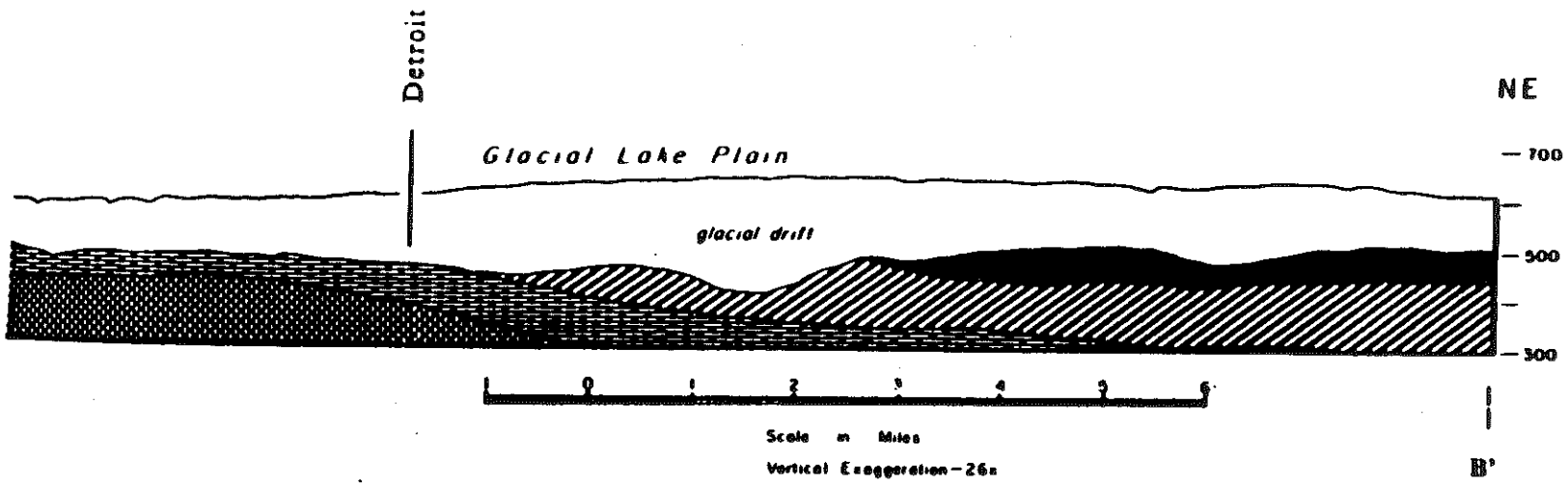
2.6.2 Flood Plain and Surface Water

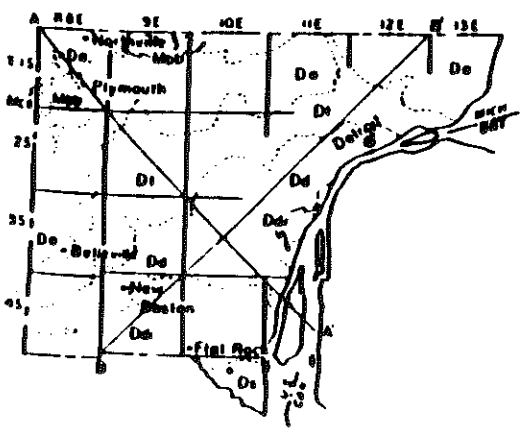
The closest surface waters, the Detroit River and one of its tributaries, the River Rouge, are located more than 4 miles from the facility. The River Rouge flows into the Detroit River, which then flows northeastward into Lake St. Clair. The Detroit River is Detroit's primary drinking-water source. The river's 100-year flood plain follows the adjacent 580-foot contour. The facility is situated at an average elevation of 610 feet, roughly 30 feet higher than the 100-year flood plain (USGS, 1974).

2.6.3 Geology and Soils

Because site-specific information was not available, regional geology and soil information is presented. Figure 3 illustrates a generalized geologic cross section of the Detroit area. The surface geology of the Detroit area is characterized by a mosaic of glacial and organic deposits. Present landforms are the result of Pleistocene epoch glaciation and subsequent deposition and erosion. Primarily, the present landforms consist of materials deposited during the Cary substage of the Wisconsin Glacial stage; however, the hardpan encountered just above the bedrock in downtown Detroit occupies part of an ancient glacial lake bed that slopes gently to nearly flat terrain that has been incised by currently flowing rivers and streams. Glacial deposits over bedrock range in thickness from 120 to 200 feet in this area. These deposits consist mainly of layers of glacial till of varying thicknesses and a thick sequence of lacustrine clays and silts. Figure 4 illustrates the distribution of permeable surface deposits in southeast Michigan.

The bedrock of Detroit consists of approximately 830 feet of consolidated and cemented Middle Devonian limestone from the Paleozoic era. This structural feature underlies all of Michigan and portions of neighboring states. Within this structural basin, the sedimentary rocks dip at an angle of less than 1 degree toward the center of the basin, which is located beneath the central portion of the southern peninsula (Mozola, 1969).





LEGEND

- Mc / Mj — COLDWATER SHALE / SUNBURY SHALE
- Mb / Mbu — BEREA SANDSTONE / BEDFORD SHALE
- Da — ANTRIM SHALE
- Dt — TRAVERSE GROUP
- Dd — DUNDEE LIMESTONE
- Ddr — DETROIT RIVER DOLOMITE
- Ds — SYLVANIA SANDSTONE
- Sb — BASS ISLANDS GROUP

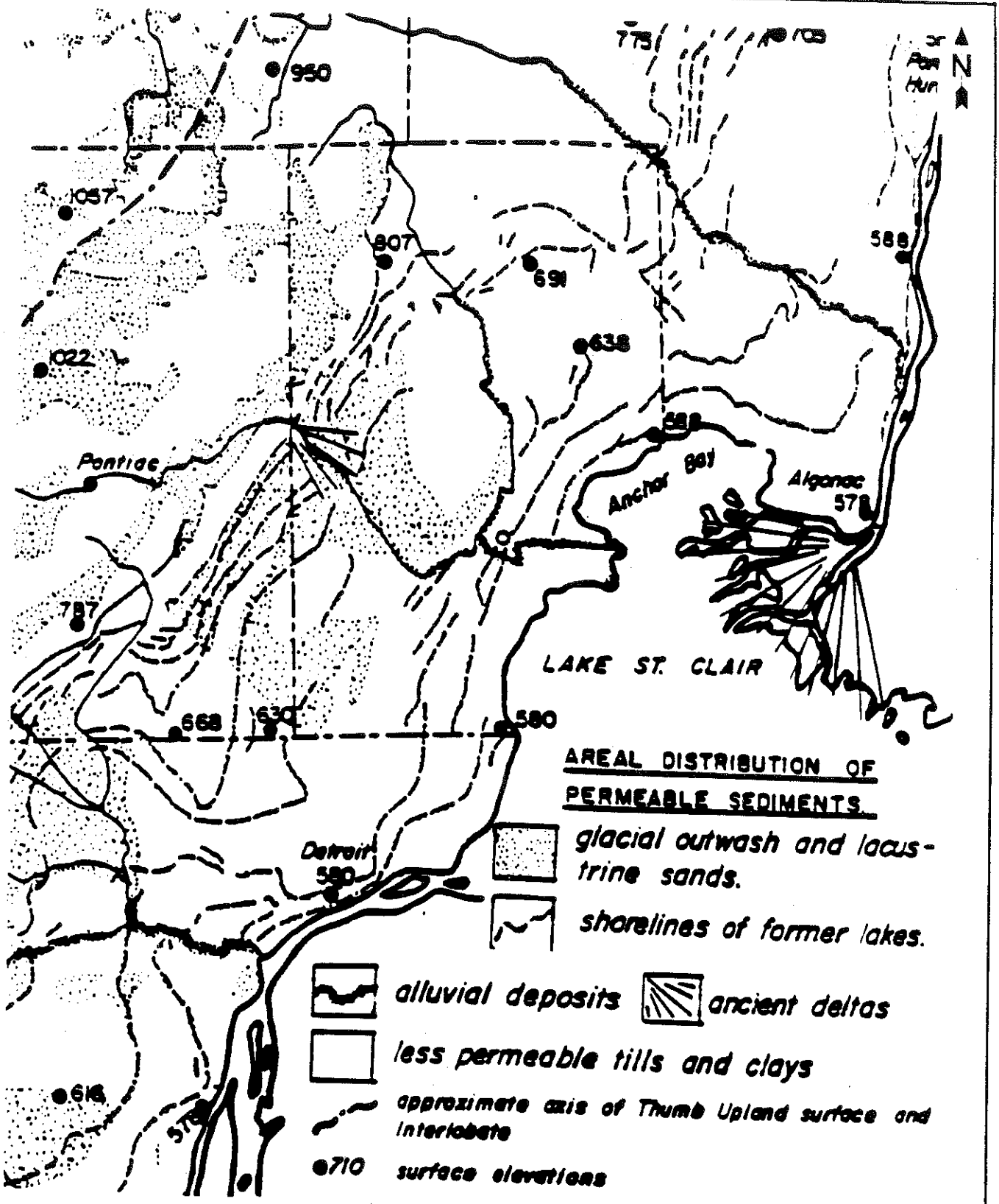
SOURCE: MODIFIED FROM MOZOLA SKETCH, 1969

BASF CORPORATION
DETROIT, MICHIGAN

FIGURE 3

GEOLOGIC STRUCTURE SECTION

PRC ENVIRONMENTAL MANAGEMENT, INC.



SCALE NOT AVAILABLE

SOURCE: MODIFIED FROM MOZOLA SKETCH, 1969

BASF CORPORATION
DETROIT, MICHIGAN

FIGURE 4
DISTRIBUTION OF PERMEABLE SURFACE DEPOSITS IN SOUTHEAST MICHIGAN

PRC ENVIRONMENTAL MANAGEMENT, INC.

Soils of the area surrounding the facility are mainly of the Wasepi-Gilford-Boyer soil association. This type of soil is characterized as having nearly level to sloping, very poorly drained, somewhat poorly drained, and well drained soils that have a coarse-textured or moderately coarse-textured subsoil. Permeability is moderately rapid, and water capacity is low. About 50 percent of the soils in this association are poorly drained, 25 percent are very poorly drained, and 15 percent are well drained. The remaining 10 percent are minor soils (U.S. Soil Conservation Service, 1977).

2.6.4 Ground Water

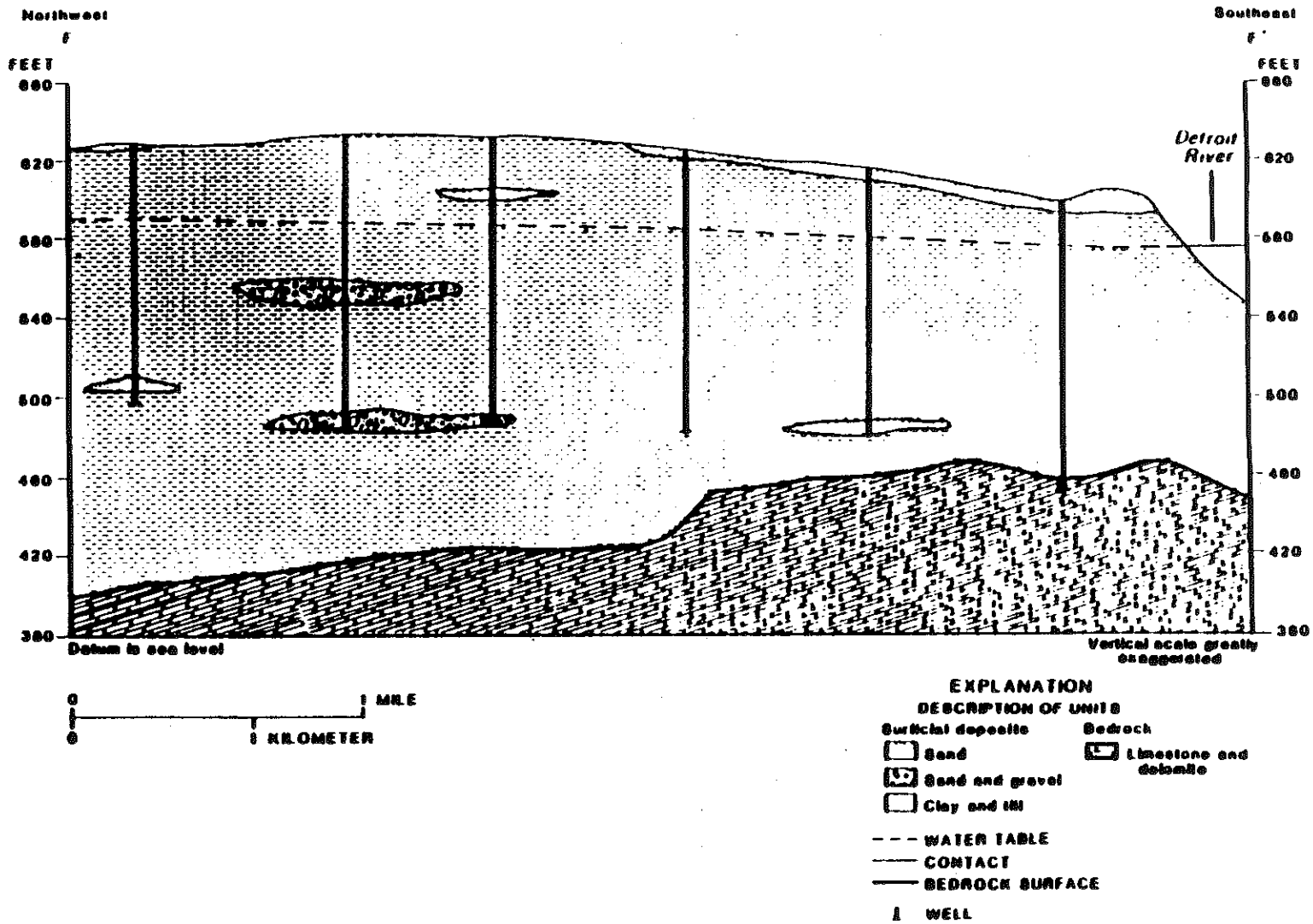
No site-specific information pertaining to ground water was available during the PA/VSI; however, a description of ground-water conditions based on regional information follows.

Ground water occurs beneath the site in water-table conditions at approximately 40 feet beneath the surface. Generally, it flows toward the Detroit River. However, because Detroit is located on a glacial lake plain consisting primarily of silts and clays, the area is not favorable for the development of wells that provide moderate-to-large yields. Storage capacities are limited and well failures can be expected during prolonged droughts (USGS, 1989). Although dry holes occur with high frequency on the lake plain, small domestic supplies within intermittent zones of relatively greater permeability than the surrounding clay and silt deposits normally are possible (see Figure 5). These intermittent zones occur under confined conditions, and both flowing and nonflowing wells can be expected. Southeast of the junction of the lake plain with the glacial moraines (see Figure 6), the frequency of occurrence, thicknesses, and extent of these confined ground-water-bearing zones decreases as the formations near the Detroit River.

2.7 RECEPTORS

The facility is in a mixed industrial and residential area, with homes and schools located less than 1/4 mile from the facility. Because the facility is located in the city of Detroit, which has a population of 1,028,000 (U.S. Department of Commerce, 1991), there is a significant population in close proximity.

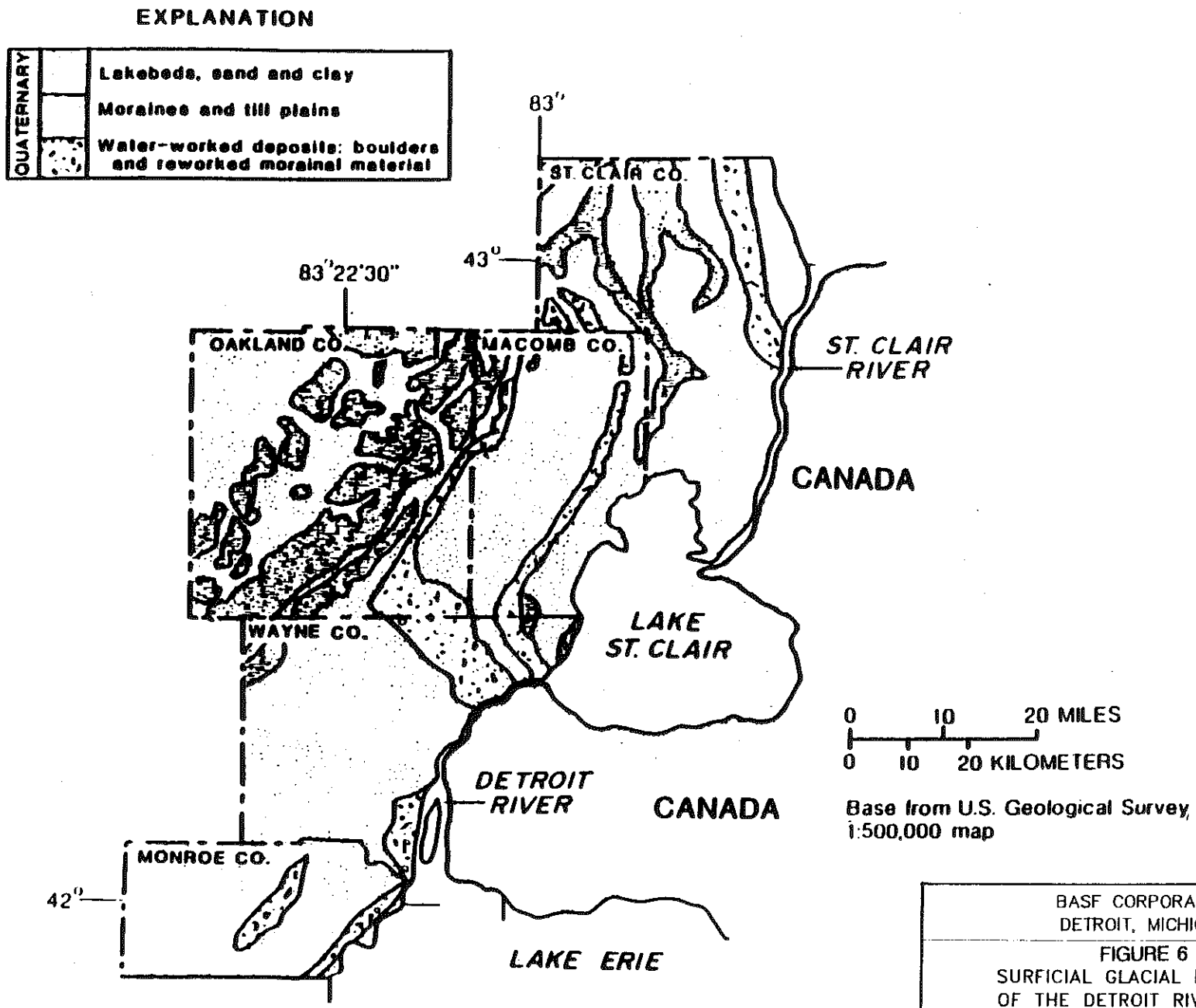
The threat to receptors through the ground-water, surface-water, air, and soil pathways is low to moderate. The BASF facility does not discharge directly to surface water from the facility; all wastewater discharges are sealed in drums, pumped and disposed of off site as hazardous



BASF CORPORATION
DETROIT, MICHIGAN

FIGURE 5
REPRESENTATIVE GEOLOGICAL
CROSS SECTION OF THE DETROIT AREA

PRC ENVIRONMENTAL MANAGEMENT, INC.



BASF CORPORATION
DETROIT, MICHIGAN

FIGURE 6
SURFICIAL GLACIAL FEATURES
OF THE DETROIT RIVER AREA

PRC ENVIRONMENTAL MANAGEMENT, INC.

wastes, or treated and sent through the sewer system to a publicly owned wastewater treatment plant and then discharged into the Detroit River. The nearest surface-water bodies are the Detroit River and the River Rouge, both more than 4 miles south of the facility. The existence of secondary containment and the distance to surface water preclude the possibility of a release of hazardous constituents to surface water.

Ground water is not used as a drinking-water source or for industrial purposes; all local water, including Detroit's drinking water, is obtained from the Detroit River (PRC, 1991a). No drinking water wells located within 2 miles of the facility were identified. Therefore, even if the facility were to affect the ground water adversely, the potential for human exposure to ground-water contamination would be low.

The potential for releases to air is moderate. Releases have occurred several times in the past, and residents in the area surrounding the facility have reported odors emanating from the facility. In most cases, the facility has taken corrective action to prevent repeat occurrences. Because of the close proximity of the facility to residences and schools, the threat to those receptors should be considered moderate.

There are no sensitive environments within 2 miles of the site. The BASF facility is monitored 24 hours per day by a security system, and access to the site is restricted by a locked and guarded gate.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 13 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations.

SWMU 1	**Former Reclamation Area**
Unit Description:	The unit consists of an area in building 20A which housed the Nortru still and 19 storage tanks. Nortru operated a spent solvent reclamation still in the building until 1984. While the reclamation operation was active, 10 of the tanks were used to store spent solvents, 2 stored still bottoms, and 7 contained reclaimed solvent. In 1984, the reclamation operation ceased, the facility was closed according to an approved closure plan, and the still was removed. The area is currently the site of the resin and clear-coat manufacturing and storage operation run by BASF.
Date of Startup:	The date of startup is unknown.
Date of Closure:	The unit has been inactive since 1984.
Wastes Managed:	Waste solvents containing acetone, tetrahydrofuran, ethyl acetate, methylene chloride, toluene, methanol, ethylene diamine, hexane, xylene, tricholorethane, and Stoddard solvent were managed by this unit.
Release Controls:	The tanks are located inside a building that had a concrete floor and walls.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.

Observations:	The 19 tanks used by the Nortru operation are still present and in use in building 20A. The tanks have been sandblasted and relined and currently are used to hold product.
SWMU 2	**Tank Farm**
Unit Description:	The unit consists of 21 aboveground tanks with a capacity of approximately 2,900 gallons each. The tank farm is surrounded by a 6-foot-high concrete wall and has a concrete floor covered with gravel. Eighteen of the tanks are used for storage of raw material. The three remaining tanks contain spent solvent. These three tanks are surrounded by a second containment wall made of steel. Each spent solvent tank stands on a concrete pedestal approximately 1-1/2 feet thick and 5 feet high. The tanks are emptied three times a week. The contents are taken off site by Petro-Chem for disposal. The spent solvent piping is above ground; the raw material piping is below ground. Photograph 1 in Attachment A shows the spent solvent tanks in the unit.
Date of Startup:	The unit began operating in 1967.
Date of Closure:	This unit is currently in operation.
Wastes Managed:	Ignitable spent solvents, rinse water, and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	The three spent solvent tanks in the tank farm are surrounded by a steel wall; the entire tank farm is surrounded by a 6-foot-high concrete wall. The floor of the unit is concrete covered with gravel.
History of Documented Releases:	On March 14, 1989, there was a release of 350 gallons from the spent solvent tanks. The spill was contained within the tank farm. In the summer of 1991, a 15-gallon spill from a spent solvent tank was contained but stained the side of the tank.

Observations:	One side of one of the spent solvent tanks was stained. No cracks, other defects, or damage were observed in the tanks.
SWMU 3	**Reactor Catch Tank**
Unit Description:	The unit consists of a raised catch tank inside building 17A that receives any entrained material vented from the reactor vessels. The material in the catch tank is pumped out approximately every 3 months. Vacuum trucks empty the tank and dispose of the wastes off site.
Date of Startup:	The date of startup is unknown.
Date of Closure:	This unit is currently in operation.
Wastes Managed:	Ignitable spent solvents and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	The unit is located inside building 17A on a concrete floor. PRC observed no other containment.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.
Observations:	There is no evidence of releases from the unit. The contents of the unit were not observed.
SWMU 4	**Resin Wastewater Storage Tank**
Unit Description:	The unit consists of a tank in building 17. The tank stores the resin water phase waste from the emulsion resin manufacturing process. The waste is pumped out of the tank and taken off site for incineration.
Date of Startup:	The date of startup is unknown.

Date of Closure:	This unit is currently in operation.
Wastes Managed:	Waste liquid resin solution is managed by this unit.
Release Controls:	The tank is located inside a building that has a concrete floor and walls.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.
Observations:	This unit was not observed during the VSI.

SWMU 5 **Portable Tank Cleaning Area**

Unit Description:	The unit consists of a portable tank cleaning machine used to clean storage tanks and covers. The cleaner consists of a tank holder, two tanks of "once-used" solvent, and one tank of fresh solvent. "Once-used" solvent is pumped into a tank for gross cleaning, and fresh solvent then is pumped in for final cleaning. The spent solvents from cleaning are pumped to the spent solvent tanks in the tank farm.
Date of Startup:	The unit began operating in 1989.
Date of Closure:	This unit is currently in operation.
Wastes Managed:	Ignitable spent solvents, waste paint and resins, rinse water, and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	This unit is located inside a building and stands on a concrete floor. PRC observed no other containment.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.

Observations:	The unit appears to be in good condition; there is no evidence of releases from the unit.
SWMU 6	**Wastewater Treatment Unit**
Unit Description:	The unit consists of a wastewater pretreatment installation in building 17. There are two aboveground tanks and a distillate column and condenser which separate butyl alcohol and water. The plant receives wastewater from the resin and paint operations and reactors and processes it through the distillate column. The butyl alcohol is sent off site for reclamation, and the remaining wastewater is processed through the system again before being released to the sewer system.
Date of Startup:	The date of startup is unknown.
Date of Closure:	This unit is currently in operation.
Wastes Managed:	Rinse water and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	The unit is located inside a building that has concrete walls and floors.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.
Observations:	No cracks, other defects, or damage were observed in the tanks. At the time of the VSI, the column was not functioning, and treated wastewater was being sealed in drums and disposed of off site by Laidlaw.
SWMU 7	**Caustic Cleaning Area**
Unit Description:	The unit consists of an area inside building 15 that houses a 250-gallon tank for cleaning machinery and equipment with a caustic solution. The

	spent caustic cleaner was neutralized and released to the sewer system. Photograph 2 in Attachment A shows the unit.
Date of Startup:	The date of startup is unknown.
Date of Closure:	This unit ceased operation in 1989 or 1990.
Wastes Managed:	Neutralized spent caustic cleaner, ignitable spent solvents, waste paint and resins, rinse water, and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	The unit is inside a building that has a concrete floor and walls.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.
Observations:	The unit is no longer in operation.
SWMU 8	**Small Container Storage Area**
Unit Description:	The small container storage area is located inside building 5. Empty buckets, pails, kegs, damaged drums, and other small containers are stored there awaiting disposal. The containers were used to store raw materials or paint for quality checks. Periodically, the containers are crushed, bailed, and disposed of off site. Photograph 3 in Attachment A shows the unit.
Date of Startup:	The date of startup is unknown.
Date of Closure:	This unit is currently in operation.
Wastes Managed:	Ignitable spent adsorbents, filtration media, miscellaneous solid objects, ignitable spent solvents, waste paint and resins, and resin/water solvent mixture wastes are managed by this unit.

Release Controls:	The unit stands on a concrete floor.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.
Observations:	There is no evidence of releases from the unit. More than 25 empty containers of various sizes were observed in the unit during the VSI. The containers were stacked and, when possible, closed.

SWMU 9 **Bailer-Crusher Pad**

Unit Description:	The unit consists of a concrete pad at the south end of building 20 where the bailer-crusher is located. The bailer crushes and bails the small containers stored in building 5 (SWMU 5). The machine stands above a pan that catches any material that spills or leaks from the small containers. The material in the pan is pumped into 55-gallon drums that then are stored in the central drum storage area (SWMU 1).
Date of Startup:	The unit began operating in 1987.
Date of Closure:	This unit is currently in operation.
Wastes Managed:	Ignitable spent adsorbents, filtration media, miscellaneous solid objects, ignitable spent solvents, waste paint and resins, and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	The unit stands on a concrete pad; wastes or solvents are contained by a metal catch pan.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.
Observations:	The unit was not observed during the VSI.

SWMU 10	**Central Drum Storage Area**
Unit Description:	The unit is a slightly sunken concrete pad approximately 40 feet by 60 feet with 3-foot-high containment walls on three sides and a 4-foot-high wall on the side that abuts building 20B. A ramp leads down into the area. The drums are stacked three high on pallets. The unit contains no drains; rather, any storm water or material accumulated is inspected visually for contamination and then pumped either into drums for off-site disposal if contamination exists or to the POTW if no contamination is believed to exist. Photograph 4 in Attachment A shows this unit.
Date of Startup:	The unit began operating in 1987.
Date of Closure:	This unit is currently in operation.
Wastes Managed:	Ignitable spent adsorbents, filtration media, miscellaneous solid objects, waste filter paper, ignitable spent solvents, overstocked and out-of-date resins and paints, waste paint and resins, rinse water, and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	The unit has a concrete, diked floor with 3- to 4-foot-high containment walls.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.
Observations:	The concrete walls and floors show no visible cracks or damage. The drums were in good condition. There is no evidence of a release from the unit.

SWMU 11	**Satellite Accumulation Areas**
Unit Description:	This unit consists of 10 satellite accumulation areas, where waste is placed in drums to await removal to either staging area. Photographs 5 and 6 in Attachment A show examples of the unit.
Date of Startup:	The date of start up is unknown.
Date of Closure:	This unit is currently in operation.
Wastes Managed:	Ignitable spent adsorbents, filtration media, miscellaneous solid objects, waste filter paper, ignitable spent solvents, overstocked and out-of-date resins and paints, waste paint and resins, rinse water, and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	Release controls vary, depending upon the location of each satellite. All areas are inside buildings that have concrete floors.
History of Documented Releases:	No documented releases from this unit were identified during the PA/VSI.
Observations:	There was no evidence of releases from the accumulation areas. The drums observed at the units appeared to be in good condition.
SWMU 12	**Paint Waste Staging Area**
Unit Description:	The unit, located in building 24, consists of an area approximately 10 feet by 5 feet. Drums are placed on a raised steel grate surrounded by a steel base with 3-inch-high walls. The capacity of the unit is eight drums, four containing solid wastes and four containing liquid wastes. Photograph 7 in Attachment A shows this unit.
Date of Startup:	The date of start up is unknown.

Date of Closure:	This unit is currently in operation.
Wastes Managed:	Ignitable spent adsorbents, filtration media, miscellaneous solid objects, waste filter paper, ignitable spent solvents, overstocked and out-of-date resins and paints, waste paint and resins, rinse water, and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	The unit is a raised steel grate with a steel floor and a 3-inch-high steel border for containment.
History of Documented Releases:	No documented releases from the unit were identified during the PA/VSI.
Observations:	At the time of the VSI, the unit contained five drums. The drums were closed, labeled, and dated, and they appeared undamaged.

SWMU 13 **Resin Waste Staging Area**

Unit Description:	The unit, located in building 17A, consists of an area approximately 10 feet by 5 feet. Drums are placed on a raised steel grate surrounded by a steel base with 3-inch-high walls. The capacity of the unit is eight drums, four containing solid wastes and four containing liquid wastes.
Date of Startup:	The date of startup is unknown.
Date of Closure:	This unit is currently in operation.
Wastes Managed:	Ignitable spent adsorbents, filtration media, miscellaneous solid objects, waste filter paper, ignitable spent solvents, overstocked and out-of-date resins and paints, waste paint and resins, rinse water, and resin/water solvent mixture wastes are managed by this unit.
Release Controls:	The unit is a raised steel grate with a steel floor and a 3-inch-high steel border for containment.

History of Documented Releases: No documented releases from the unit were identified during the PA/VSI.

Observations: At the time of the VSI, the unit contained no drums. There was no evidence of releases from the unit.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

RELEASED
DATE 3/9/00
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 13 SWMUs at the BASF facility; no AOCs were identified. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the BASF facility and suggests further action.

SWMU 1 **Former Reclamation Area**

Conclusions: This unit has a low potential for release of hazardous wastes or hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit is no longer operational and is inside a building that offers secondary containment in the form of a concrete floor and walls. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

SWMU 2 **Tank Farm**

Conclusions: This unit has a low potential for release of hazardous wastes and hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit has a concrete floor surrounded by a 6-foot-high concrete wall that acts as secondary containment. In addition, the spent solvent tanks are surrounded by a second containment wall about 1-1/2 feet high and stand on a steel floor. Three releases from this unit have been documented. Two were contained within the unit, and the material was recovered. The first spill resulted in the release of more than 300 gallons of xylene to the sewer system. Since then, added precautions have been taken to ensure that such spills will not be repeated.

Recommendations: No further action is recommended at this time.

RELEASED
DATE 3/7/00
RIN #
INITIALS WV

ENFORCEMENT
CONFIDENTIAL

TABLE 3

SWMU SUMMARY

	SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1.	Former Reclamation Area	Unknown to 1984	None	No further action
2.	Tank Farm	1967 to present	Stain on side of tank. Releases occurred in 1986, 89, and 91. The 1986 spill resulted in the release of xylene to the sewer system	No further action
3.	Reactor Catch Tank	Unknown to present	None	No further action
4.	Resin Wastewater Storage Tank	Unknown to present	None	No further action
5.	Portable Tank Cleaning Area	1989 to present	None	No further action
6.	Wastewater Treatment Unit	Unknown to present	None	Install secondary containment
7.	Caustic Cleaning Area	Unknown to 1989 or 1990	None	No further action
8.	Small Container Storage Area	Unknown to present	None	No further action
9.	Bailer-Crusher Pad	1987 to present	None	No further action
10.	Central Drum Storage Area	1987 to present	None	No further action
11.	Satellite Accumulation Areas	Unknown to present	None	No further action
12.	Paint Waste Staging Area	Unknown to present	None	No further action
13.	Resin Waste Staging Area	Unknown to present	None	No further action

SWMU 3 **Reactor Catch Tank**

Conclusions: This unit has a low potential for release of hazardous wastes or hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit is inside a concrete building, where the walls and floor offer secondary containment. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

SWMU 4 **Resin Wastewater Storage Tank**

Conclusions: This unit has a low potential for release of hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit is inside a concrete building, where the walls and floor offer secondary containment. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

SWMU 5 **Portable Tank Cleaning Area**

Conclusions: This unit has a low potential for release of hazardous waste or hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit is stored and used inside concrete buildings, where the concrete floor and walls offer secondary containment. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

RELEASED
DATE 3/1/00
RIN #
INITIALS MV

SWMU 6 **Wastewater Treatment Unit**

Conclusions: This unit has a moderate potential for release of hazardous waste or hazardous constituents to ground water, surface water, air, and on-site soils. The potential is moderate because, although the unit is located inside

ENFORCEMENT
CONFIDENTIAL

RELEASED
DATE 2/2/03
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

soils. The potential is moderate because, although the unit is located inside a concrete building, the concrete floor and walls offer minimal secondary containment, given the volume of waste that is stored in the tanks. There is no indication that releases from the unit have occurred, however, if a release occurred, the waste could migrate to building drains and possibly to on-site soils.

Recommendations: PRC recommends that the facility install secondary containment.

SWMU 7 **Caustic Cleaning Area**

Conclusions: This unit has a low potential for release of hazardous wastes or hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit is inside a building that has a concrete floor and walls for secondary containment and because the unit is no longer in operation. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

SWMU 8 **Small Container Storage Area**

Conclusions: This unit has a low potential for release of hazardous wastes or hazardous constituents to ground water, surface water, air, and on-site soil. The potential is low because the unit is inside a building that has a concrete floor. The building acts as secondary containment. In addition, the containers are empty and only residual wastes are present. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

SWMU 9 **Bailer-Crusher Pad**

Conclusions: This unit has a low to moderate potential for release of hazardous wastes or hazardous constituents to ground water, surface water, air, and on-site soil.

The potential is low to moderate because the unit is located on a concrete pad away from the paved area of the facility and has no secondary containment except the concrete floor and the pan used to collect dripping and leaking wastes; however, the unit manages empty containers that contain only small amounts of residual wastes. The unit was not observed during the VSI. There is no indication that release from this unit have occurred.

Recommendations: No further action is recommended at this time.

SWMU 10 **Central Drum Storage Area**

Conclusions: This unit has a low potential for release of hazardous wastes and hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit is located on a concrete floor and is surrounded by a 3- to 4-foot-high berm for secondary containment. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

SWMU 11 **Satellite Accumulation Areas**

Conclusions: This unit has a low potential for release of hazardous waste or hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because all the areas have secondary containment in the form of a concrete floor and walls. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

RELEASED
DATE 3/7/01
RIN #
INITIALS MV

SWMU 12 **Paint Waste Staging Area**

Conclusions: This unit has a low potential for release of hazardous wastes or hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit is inside a concrete building, where the

ENFORCEMENT CONFIDENTIAL

walls and floor offer secondary containment. The unit itself provides secondary containment in the bordered steel pan which supports the grate under the drums. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

SWMU 13 **Resin Waste Staging Area**

Conclusions: This unit has a low potential for release of hazardous wastes or hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit is inside a concrete building, where the walls and floor offer secondary containment. The unit itself provides secondary containment in the bordered steel pan which supports the grate under the drums. There is no indication that releases from the unit have occurred.

Recommendations: No further action is recommended at this time.

RELEASED
DATE 3/7/00
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

REFERENCES

Air Pollution Control Division (APCD), 1981a, Violation Notice No. 41980 referring to air contaminant release from tank truck unloading system (May 4).

Anonymous (Anon.), 1991, PEAS (definition of acronym unknown) complaint report on BASF facility (February 6).

APCD, 1981b, Odor Complaints 493 and 495 (June 25).

APCD, 1982, Violation Notice No. 43645 referring to air contaminant release from waste system (September 16).

APCD, 1983, Inspection Report for sewer system examination (May 10).

APCD, 1985, Violation Notice No. 46803 for failure to obtain a permit for installation of clear-coat blending tank (December 9).

APCD, 1986, Violation Notice No. 46836 for the emission of an air contaminant in such a quantity as to cause an odor level with an intensity rating of #2 (January 16).

APCD, 1987a, Inspection Report form referring to a spill of N-buty acrylate on August 9 (August 10).

APCD, 1987b, Inspection Report of Annual Inspection (August 13).

APCD, 1988, Inspection Report of Compliance Inspection (July 21).

APCD, 1989, Inspection Report (December 18).

BASF Corporation (BASF), 1986, Letter to APCD describing corrective action taken for Violation Notice No. 46836 (February 2).

BASF, 1987a, Letter to Michigan Department of Natural Resources (MDNR) responding to one of the violations observed during the July 23, 1987 inspection (August 12).

BASF, 1987b, Letter to Detroit Fire Department detailing Dowtherm J release from boiler and corrective action taken (October 30).

BASF, 1987c, Letter to MDNR responding to remaining violations observed during the July 23, 1987 inspection (November 25).

BASF, 1989a, Letter to MDNR explaining March 14 spent solvent spill and steps taken to prevent a recurrence (April 5).

BASF, 1989b, 1989 Hazardous Waste Report (not dated).

BASF, 1990, Letter to APCD detailing propylene oxide release and corrective action taken (July 3).

BASF, 1991, Letter to Detroit Department of Health responding to violations observed during February 19, 1991 inspection (April 5).

Cook Industrial Coatings, Inc. (Cook), 1980a, RCRA Notification Form (November 17).

Cook, 1980b, RCRA Part A Permit Application (November 17).

Cook, 1981, Letter to APCD describing corrective action taken for Violation No. 41980 (May 13).

Cook, 1982, Letter to MDNR indicating compliance with the personnel training records requirement of RCRA (February, 24).

Detroit Department of Health (DOH), 1989, Letter to BASF referring to May 2, 1989 inspection during which no violations were found (May 9).

DOH, 1991a, Letter to BASF listing violations observed during February 19, 1991 inspection (March 7).

DOH, 1991b, Letter to BASF indicating receipt of April 5, 1991 letter and requesting additional response on unresolved violations (May 8).

Detroit Fire Department, 1987, Notice of Violations No. 63216 referring to release of Dowtherm J from boiler (September 18).

EPA, 1984a, Letter to Glasurit approving closure plan (May 25).

EPA, 1984b, Letter to Glasurit confirming receipt of certification of closure and returning letter of credit (June 19).

EPA, 1991, Letter to BASF concerning manifest violations (July 1).

Erickson, Mary C., 1990, Meteorologist, National Weather Service, personal communication with Patricia Murphy, PRC Environmental Management, Inc. (PRC) (September 26).

Glasurit America, Inc. (Glasurit), 1982, Letter to U.S. Environmental Protection Agency (EPA) referring to a name change from Cook Industrial Coatings to Glasurit (September 30).

Glasurit, 1983, Letter to APCD describing corrective action taken for Violation Notice No. 43645 (August 19).

Glasurit, 1984a, Letter to MDNR responding to its letter of December 21, 1983 (January 4).

Glasurit, 1984b, Letter to EPA announcing intended closure of hazardous waste facility (January, 6).

Glasurit, 1984c, Letter to MDNR concerning tank status and including notification of closure and closure costs (January 26).

Glasurit, 1984d, Letter to EPA certifying closure (May 30).

Glasurit, 1985a, Letter to MDNR listing actions taken to correct violations observed during February 7, 1985 inspection (March 5).

Glasurit, 1985b, Letter to EPA referring to a name change from Glasurit to BASF Corporation (November 27).

MDNR, 1981, Notice of violation and acceptance of telephone response from Cook (January 26).

MDNR, 1982a, RCRA Inspection Report - Interim Status Standards (January 29).

MDNR, 1982b, Letter to Allen Kinsler, Cook Industrial Coatings, Inc., referring to a violation discovered during January 29, 1982 inspection (February 16).

MDNR, 1982c, Letter confirming receipt of Cook's February 24, 1982 letter (March 8).

MDNR, 1982d, Letter referring to interim status acknowledgement (June 13).

MDNR, 1983a, Letter to Allen Kinsler, Glasurit, referring to September 21, 1983 facility inspection and listing violations discovered (October 26).

MDNR, 1985a, Letter to Glasurit listing violations observed during February 7, 1985 inspection (February 11).

MDNR, 1985b, Letter to Glasurit acknowledging receipt of Glasurit's letter dated March 5, 1985 responding to the February 7, 1985 inspection violations letter (March 18).

MDNR, 1987a, Letter to BASF listing violations observed during July 23, 1987 inspection (July 30).

MDNR, 1987b, Letter to BASF acknowledging receipt of its letter outlining changes to manifest instructions (August 24).

MDNR, 1989a, Letter to BASF outlining out-of-state manifest requirements and requesting copies of BASF out-of-state manifests (September 11).

MDNR, 1989b, Letter confirming receipt of BASF October 4, 1989 letter describing its compliance program regarding out-of-state manifests (October 9).

MDNR, 1990, Notice of Intent to Renovate/Demolish under Asbestos Program completed by BASF (December 13).

Mozola, A.J., 1969, Geology of Land and Ground Water Development in Wayne County, Michigan. State of Michigan Department of Natural Resources, Report of Investigation 3.

National Oceanic and Atmospheric Administration (NOAA), 1980, Environmental Data Information Service, Narrative Climatological Summary, Detroit Metropolitan Airport, Michigan.

PRC, 1991a, personal communication with Judy Williams, Detroit Water and Sewerage Department (May 21).

PRC, 1991b, PRC preliminary assessment/visual site inspection (PA/VSI) (November 6).

PRC, 1991c, telephone conversation with Allen Kinsler, BASF, (313) 861-1000 (December 17).

U.S. Department of Commerce, 1991, Bureau of Census, Statistical Abstract of the United States.

U.S. Geological Survey (USGS), 1974, Map of flood-prone areas.

USGS, 1981, 1983, Topographic Map, Highland Park Quandrangle, Michigan.

USGS, 1989, Ground Water Flow and Quality Near the Upper Great Lakes Connecting Channels, Michigan.

U.S. Soil Conservation Service, 1977, Soil survey of Wayne County area, Michigan.

ATTACHMENT A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

BASF CORPORATION
DETROIT, MICHIGAN
MID 007 138 746

Date:	November 6, 1991
Facility Representatives:	Allen Kinsler, Ecology Coordinator, BASF Corporation (313) 861-1000, extension 448
Inspection Team:	Tom Sinski, PRC Environmental Management, Inc. Patricia Murphy, PRC Environmental Management, Inc.
Photographer:	Patricia Murphy
Weather Conditions:	Partly cloudy, mid-30s
Summary of Activities:	The visual site inspection began at 8 a.m. at the BASF facility at 3301 Bourke Avenue. PRC's inspection team met with Allen Kinsler of BASF in a conference room at the facility. Tom Sinski reviewed the purpose of the site visit with Mr. Kinsler. The history of the site was reviewed, and past and current waste generation, storage, and disposal practices were discussed. The tour of the facility began at 9:38 a.m. Mr. Kinsler discussed specific operations conducted at each of the production areas. The tour began in building 24 of the paint manufacturing plant and proceeded through the small container storage building and the caustic cleaning area to building 17 and 17A, which house the waste water treatment unit and the resin manufacturing plant. The clear-coat manufacturing building, 20A, and the former Nortru reclamation area in building 19 were inspected next. The outside SWMUs, the central drum storage area, and the tank farm were inspected last. The facility tour was completed at 11:05 a.m. A brief exit interview was conducted with Mr. Kinsler. The PRC inspection team left at 11:25 a.m.

Photograph No. 1
Orientation: Northwest
Description: Three spent solvent tanks in tank farm

Location: SWMU 2
Date: November 6, 1991

Photograph No. 2
Orientation: Northwest
Description: Caustic cleaning tank and floor drains

Location: SWMU 7
Date: November 6, 1991

Photograph No. 3
Orientation: West
Description: Small Container Storage Area

Location: SWMU 8
Date: November 6, 1991

Photograph No. 4
Orientation: Southwest
Description: Central Drum Storage Area

Location: SWMU 10
Date: November 6, 1991

Photograph No. 5
Orientation: North
Description: Satellite Accumulation Area with resin filter press

Location: SWMU 11
Date: November 6, 1991

Photograph No. 6 **Location:** SWMU 11
Orientation: Northeast **Date:** November 6, 1991
Description: This photograph shows the Satellite Accumulation Area and filter press. The area accumulates 1 to 2 55-gallon drums of waste. The filter press has about a 16-cubic-foot capacity.

Photograph No. 7
Orientation: North
Description: Paint Waste Staging Area

Location: SWMU 12
Date: November 6, 1991

ATTACHMENT B

VISUAL SITE INSPECTION FIELD NOTES

(46) TMS

BASF (Bourke)
MID 007 138 746
3301 Bourke Dr.
Detroit Mi 48238

Ratti Murphy + Tom Lenski arrived at 8:00 A.M.
Met with Allen Kuratec at 8:35 A.M.

Plant started 1907.
Akron Varnish Company. In 1913 Cook Paint started making auto paint. 1979. BASF brought into Cook paint and obtained possession of site. Now known as Coatings division of BASF. Up until a year the development labs were onsite

TMS (47)

Labs were moved to Southfield. Now have paint plant, resin plant and normal operations. Now they are <90 day generators.

Have satellite areas, staging areas, and central accumulation area. 10 Total satellite areas.

3 spent solvent tanks (MEK/Xylene some butyl alcohol).

Was a 2 solvent recovery operations onsite. A Part A was filed for the one in bldg 20A. Used storage tank to hold spent solvent/bottoms and reclaimed solvents. Actual still provided by Nor-Tru.

That unit in Bldg 20A was operated until 1983. Nor-tau removed still. And Closure operations were done on tanks (17 total tanks)
- 11-waste tank
2- still bottom tanks.

2nd recovery operation was a small still for solvent recovery. Cleaning solvent pumped to settling tanks (3) then pumped to Briton still.
2 receiving tanks (on clean side)
3 spent solvent tanks are still active. Receiving tank still active, holds reclaimed solvent. Still was removed and scraped 1989. Ceased operation in 1985. Area now used as storage area for raw-material.

Nor-tau still never used on BASF product.

Resin Plant OCPSF WWTP regulations.

Stripper installed in resin building. Wastewater generated is now drummed and shipped offsite. Wastewater normally discharged to POTW. Disposed by Laidlaw, (5000gal/wk) 5000 gallons/wk discharged when working
Water borne paint wastewater from paint plant is not treated but is drummed and sent offsite

for incineration.

265 people working 3 shifts per day.

total size of facility is 20.75 acres. Actual production 13.6 acres.

Wolf bldg purchased in 1987 used only for administration and raw material storage.

When closure operation took place did not accept any more offsite solvents. Typical solvents MEK, Toluene, Xylene based wastes. (not Methylene chloride TCE not accepted). Reclaimed for use offsite.

1 fuel oil UST. and one tank used for water circulation. All other USTs used for raw material storage and reclaimed solvent.

All these tanks were closed in 1986.

Tank farm near bldg 17 contains non-hazardous product oils. Currently not used.

Tank farm near bldg 11C 2 tanks remain. 1 filled with fly ash the other holds wastes. All other tanks removed. held raw material + reclaimed solvents.

UST farm under the tank farm at south west corner had 4 USTs. All tanks cleaned and filled in place. Tank held raw material.

All UST tanks were cleaned in 1986.

2 tank near alley 12 held fuel oil.

Spill in 1989. In the spent solvent tanks. Into the overflow containment. Totally contained no solvent was released to surface

Another spill (15 gallons) overflow of tank in tank farm spent solvent Occured summer of 1991. Containment walls held the material

1986 1987 Release of Xylene (300-400 gallons) escape to sewer.

1990 Charging a reactor, control valve was blocked and material release to nearby system. (spilled material was a resin coating solvent). Discharged to sewer. Approx 1000 #-1500 lbs Xylene and polymer resin was not recovered assumed it went to sewer

Facility also generates filter wastes / cleaning wastes / wastewater from resin plant. Spent containers.

Solid wastes stored in 55-gallon drums. Satellite area to staging area to central accumulation area.

3rd Fl bldg 24+23 old development lab
2nd Fl (24) another lab; offices, and storage of raw products
1st Fl (24) shipping.

2nd Fl (23, 11A, C) dispersion & charging area for blending & resin on 1st floor.

3rd Fl (11A, B, C) quality assurance lab.

1st Fl (23, 11A, C) blend tanks. Material

11B - storage area (1st Floor)
" office (2nd Fl)

Bldg 5 entrance bldg. storage of equipment and empty containers.

Bldg 15 - Caustic cleaning of equipment - & storage of water borne material.
Caustic water is neutralized and discharged down sewer.

Bldg 16 Portable tank tank cleaning facility. Cleans tanks and lids.

Bldg 12 Boiler house

Resin Plant
Bldg 17, 20, 25, 25A.

Storage tanks in 20, 25.

17 Container storage, staging area,

20A. Clear coat mfg and storage.

20B Brick room

Bldg 21 - old boiler room.

Bldg 18 Peroxide storage bldg. Used in resin plant as chain rxn initiator
Inspection started at approx. 9:50

Staging area in Bldg 24 used to store drums <90 days
Contained 5 drums at the time on a steel grate.

Satellite area with filter bag disposal
Drums are grounded and labeled Hazardous Waste
MEK, Xylene, filter waste

liquid are pumped into tank from filter bag shed.

3 spent solvent tanks 2900 gallons each. In a tank farm surrounded by concrete wall approx 6 ft high. Gravel over concrete on bottom. Spent tank are surrounded by a 2nd containment wall made of iron.

Spent tanks are on a concrete pedestal approx 1½ ft thick and 5 ft off site ground.

ank are emptied 3

times a week. Taken offsite for reclaim. Petro-chem picks up the solvents.

18 tanks are raw material storage.

Spent Solvent Piping for solvent tanks is all above ground.

Fresh solvent piping is below ground.

Bldg 15. where the old solvent still was located now used for raw material and intermediates.

Neutralization room. Has a neutralization tank filled with caustic for cleaning (250 gallon tank) neutralized work acid. Wastewater is discharged to sanitary sewer system. The bldg has grated floor drains connected to sanitary sewer.

Bldg 17 Pretreatment system. 1st tank (10,000 gallon) receives WW. Has an emulsion layer which settles on top. Water is pumped to 2nd tank (11,000 gallon) then pumped into ~~condenser~~ of distillation column and condenser

to separate water and butyl alcohol. Butyl alcohol is refined at another BASF site. Right now the distillation column is not working correctly all wastewater is being drummed and disposed of by Laidlaw

Staging area in Resin plant. Same as paint plant. No drums currently at the site. Cap. 8 drums

Satellite area in quality control lab. One drum. Dented

Satellite drum near filter press in resin plant.

Clear Coat 20A. Another satellite area. Concrete floor. Product storage tanks micro-gel, clear coat. Concrete floor

Sump in the room to catch spills. No drains.

Central accumulation area outside and concrete pad. Submerged wall 3 ft high. Containment wall. Ramp leads down into tub area. Drums are stacked on pallets. 3 high. Barrels contained some water. Approx size 40 ft x 60 ft

Concrete appeared sound no cracks. Containment Drain in corner can be pumped to sewer. Control valve operated pneumatically. Spills that are hazardous are not pumped.

Capacity of pad is 460 drums. (Containment is 1½ times the capacity)

Catch tank outside of building 23A catch any foam from vent in reaction vessels. The material from catch tank goes to caustic scrubbers to remove solvents in my opinion.

Scrubber is a bubble through scrubber containing caustic.

Catch tank is pumped approx every 3 months. Vacuum truck pumps tank and disposes offsite.

B2.2g 5

Small containing storage area. Cleaned and sent to Excell Disposal Company in Chicago.

Tour ended at ~ 11:07 A.m.
Exit interview left the facility at 11:30 A.m.

Surrounding area is residential with some industry.

11-6-91 PM

0800 BASF (Bourke) Coatings MID-22 7-130-746

0820 Met with Allen Kinsler in conference room to kick things off.

1907- Akron Varnish Co.
1913- Cook Paint & Varnish Co.
mfg. Automotive paints
Cook owned til 1979

always mfg. paints - use to have development labs - they were moved to Southfield 2yrs. ago - now only have quality labs

Paint plant & resin plant wastes - <90 day generators have Satellite Accum. Areas small capacity staging areas (1 in paint plant, 1 in resin plant) where drums are held and then taken to drum storage area

3 spent solvent tanks - steel pan containment (MEK, butyl alcohol, xylene)

Interim Status storage permit Bldg. 20A? - Storage tanks held spent solvent, bottoms & reclaimed solvent. Reclamation unit owned by Nortrum Co. (owner Norm Foster) They supplied solvent operated reclaiming equipment, disposed of bottoms and took away solvent. 11 waste tanks (2 bottom still residue) and 7 reclaimed product tanks.

Second reclaiming operation - small pot still for on-site material. Pipe out to 3 tanks in tank farm - settled - then piped to a small Brighton still - 2 receiving tanks - went thru

Quality ~~tank~~ in checks before going to refined product tank.
Area now used for ~~inbound~~ storage of water born materials
Still use storage tanks and refined product.

Subject to OSPCF discharge - water generated from resin mfg. process recovery stripper was used here. Treated wastewater normally sent to POTW - when problems occur. Material is drummed and sent off site for disposal.

Wastewater also generated from paint plant from waterborne equipment cleaning - thats sent off for incineration.

Approx. 265-270 employees
20.75 acres total 13.6 acres production
Wolf Bldg. purchased in 1986
used for offices - engineering & accounting

Most of off-site solvents included: Toluene, xylene, MEK - methylene chloride (& trichlor) was not accepted. No off-site reclaimed solvents were ever used at this plant.

Had raw material USTs those tanks were closed in Nov. 1986. Now only have 1 fuel oil UST. Raw material tanks were also used for reclaimed material. USTs by Bldg. 17 held corn oils, etc. were cleaned and filled with fly ash.

USTs adjacent to Bldg. 11 were removed. Two remain the one under Bldg. 11C was cleaned and filled with fly ash. 2nd one is used for wastewater(3)

Fuel oil UST adjacent to wolf Bldg. used to supply boiler which heats Bldg.

Were also(4) USTs underneath above-ground tank farm - they contained reclaimed material. These were also closed in 1986.

4/5/89 350 gallon spill from spent solvent tanks in tank farm in back. Spill was totally contained

15 gallon spill in tank farm of spent solvent - Summer '91 Stained side of tank

1980-7 300 - 400 gallon xylene spill had discharged water to sewer forgot to close valve and xylene went thru sewer.

1990 - escape to sewer, charging reactor - bolt got caught in manifold rather than diverting to second reactor it overflowed and went into vent system. New system was installed with containment if it overfills it diverts back to the room where the person pumping is. The spill was a resin with solvent material.

Note* 1500 lbs not recovered rest was recovered from vent lines & reactor

thru to sewer < 1,500 lbs xylene + polymers

Cleaning tanks and equipment and filtering is primary generator of solid waste. Some from spills clothing, rags etc.

Pigment from dust collectors are added to resin filter waste and disposed of together. All waste is drummed.

Central Storage where waste is brought from staging areas is outside of Bldg. 20A.

3rd floor Bldg. 24 & 23

2nd floor 24 - lab, no longer used office, closed container storage of pigment pastes

1st floor - Shipping

23 - 2nd fl. 11A, B, C - dispersion area & charging area for blend tanks on 1st floor

1st floor 11A, B - QA area labs, Spray booths

11, 11A & 11C - blend tanks

11B - 1st fl. general storage area

11B - 2nd fl. - offices

14 - stairwell & elevator bldg.

15 - walk thru Bldg - store equip. area where empty containers are accumulated (not drums) pails, etc

15 - Caustic cleaning equip. (1/3) Storage of water-borne raw materials in other 2/3

Cleaning solution - wastewater neutralized & discharged to sewer.

16 - Portable tank cleaning area portable machine to clean tanks & lids

12 - Boiler house

17, 20, 25, 25A - resin mfg.
20 & 25 also contain storage tanks
17A - raw mat'l storage
staging area
~~18~~ PM non-haz. storage (labels, etc)
20A - primarily clear coat mfg
& storage
20B - break room.
21 - old Dothern Boiler rooms
Boilers have been ~~removed~~ cleaned & will be removed.
18 - Peroxide storage Bldg
WOH - receiving, nonhaz. raw mat'l
storage, maint. & offices.

0938 finished discussion and started
walk thru of facility.

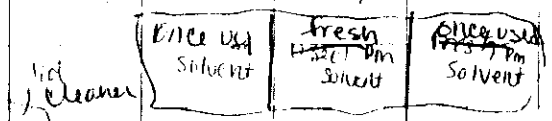
0959 Staging area in Bldg. 24 Photo 15
all drums, closed labeled & dated
Photo 16 - filter bag used to press
out liquids - liquids accumulate
in 55 gallon drum at satellite accumulation (SAA) area.
Solids from bag filter also drummed

Staging area has 8 drum
capacity to allow for 1 pallet of
liquids and 1 pallet of solids
before material is moved
to central accumulation area.

Patricia A. Murphy 11-6-91

11-6-91 PM

Tank Cleaning



Spent solvent is pumped to tanks out back

2,900 gal - 3 spent solvent tanks

Photo 17 - emptied 3 times per week for off-site reclamation area surrounded by ~ 6 ft concrete dike.

Total of 21 tanks on site for farm all others are raw product. monomer tanks piping are above ground. raw material piping is underground. Spent solving piping is above gr.

Bldg. 15 in area where raw product is stored & some intermediates (pigment powder)

11-6-91 PM

is where BASFs still was used.

Caustic cleaning & neutralizing floor drains ~~cont~~ connect to sewer system. tank is ~ 250 gallons

Photo 18 - ~~cle~~ caustic tank and floor drain.

~~Bldg~~

Bldg. 17 houses pretreatment system. 1st tank receives wastewater (132) - emulsion layer settles out (held for 3 days) water is transferred to next tank (130). Then goes to stripper thru condenser - phase separation recovered butyl alcohol sent to a sister site & refined then returned to this plant

11-6-91 PM

water goes back to tank 131 for retreatment. ~~Takes~~
Stripper gets ethyl benzene to (limits) OCPSF.
132 - 10,000 gal.
131 - 11,000 gal capacity
Currently WW going from 132 to stripper, then WW held in 131
Staging area for resin plant in Bldg. 17. (empty)
8 drum capacity

Quality Control lab - with funneled drum for satellite accumulation of lab wastes.

Photo 19 - resin filter press. shovel waste into drum.

Bldg. 20A - Clear coating mfg.
use filter ~~press~~ bag instead rather press like in resin area.
19 - attached to 20A - location of former North operation.
tanks 210 - 219 - product & intermediates
227 - 220 - resins & product.
drains in this area collect WW which goes to WW treatment tank.
Central Accumulation Area
Photo 20 - Cement dike - 4ft on Bldg. side and 3ft on road side and front & back. Drums stacked 3 high.

Every 3 months material in the water tank ~~attached~~ on by monomer tank is emptied into vac truck and disposed of.

Relief tank for reactor 92

1 Pail is container storage area for disposal (Exel Disposal in Chicago) (crushed first)
Pan under crusher collects any residue and dispose of as hazardous. Photo 21

1105 Completed inspection and went back to conference room for a debrief.

Peroxide is used in resin plant as a chain reaction initiator.

- Wastewater from tank 131 is sent in Buck to Landlaw and occassionally to IFR.
~ 4 loads / week. ~5,000 gals per load.

- Have 10 satellite accumulation areas including the one in QA lab.

1125 Left site

Patricia A. Murphy 11-6-91

NR

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

REPLY TO ATTENTION OF:

5HR-12

October 29, 1991

Allen Kinsler
BASF Corporation
3301 Bourke Avenue
Detroit, Michigan 48238

Re: Visual Site Inspection
BASF Corporation
Detroit, MI
MID007138746

Dear Mr. Kinsler:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

Printed on Recycled Paper

The VSI has been scheduled for November 6, 1991. The inspection team will consist of personnel of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Michigan Department of Natural Resources (DNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion may be made available upon request.

Sincerely yours,

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

enclosure

cc: Ben Okwumabua, Michigan DNR
Dennis Drake, MDNR - Lansing
Ken Burda, MDNR - Lansing

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

Testing Engineers & Consultants, Inc.

P.O. Box 249 • 1333 Rochester Road • Troy, Michigan 48099

313-588-6200 or Dial T-E-S-T-I-N-G

John Banicki, P.E.
Kenneth Cummins, L.S., P.E.
Gerald M. Belian, P.E.
Elihu Geer, PhD, P.E.
Michael Davinich, P.E.

T.E.C. Report Number: 9322-1
Date Issued: 11 May 1984

Glasurit America, Inc.
P.O. Box 38009
Detroit, Michigan 48238

Attention: Mr. Allan Kinsler

Re: Testing of 11 Tanks (numbers 210-220) for Combustible Vapors and Visual Inspection of Same.

Dear Mr. Kinsler:

On 3 May, 1984 the above referenced storage tanks were tested for the presence of combustible vapors and visually inspected for the presence of sludges and/or residues remaining in the tank.

The flammability tests were performed using an Edmont #60-400 Combustible Gas/Oxygen Monitor. The instrument was calibrated on 3 May, 1984 using Methane Test Gas.

All storage tanks tested were found to be free of combustible vapors and contained no visible sludges or residues.

We are pleased to provide this service. Should you have any questions regarding this report, feel free to contact us at your convenience.

Respectfully submitted,

TESTING ENGINEERS & CONSULTANTS, INC.

Scott Chandler /DB

Scott Chandlers
Chemist - Environmental Services

David W. Byrd

David W. Byrd
Staff Consultant

SC/DWB/mr

All services undertaken subject to the following general policy. Reports are submitted for exclusive use of the clients to whom they are addressed. Their significance is subject to the adequacy and representative character of the samples and to the comprehensiveness of the tests, examinations of surveys made. No quotations from reports or use of TEC'S name is permitted except as expressly authorized by TEC in writing.

CONSULTING ENGINEERS & FULL-SERVICE PROFESSIONAL TESTING AND INSPECTION

OFFICES IN ANN ARBOR, DETROIT, LANSING AND TROY