TSD File Inventory Index

Date: August 19, 2009

Initial: [illegible]

Facility Name: GMC (Delco Chassis Division - Two Folder Site)

Facility Identification Number: OHD 001 880 442

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

Total 2

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
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.5 Stabilization		**G.1 Risk Assessment**	
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.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1.			

Note: Transmittal Letter to Be Included with Reports.
Comments: Two folder site/F.I documents are in separate folder

Public Participation

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF SOLID WASTE

DATE: OCT 9 1981

SUBJECT: Status of Delisting Petitions

FROM: Matthew A. Straus, Manager Matt
Hazardous Waste Definition Program, HIWD (WH-562)

TO: See below

RECEIVED
OCT 16 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

Gene
Copies to
Hank
Y
Dan

Attached for your information is a copy of the latest status report for all delisting petitions which had been received by EPA as of October 7, 1981. Of the total 220 petitions received, 164 or 76 percent have been processed, mooted by amendments to the regulations, deferred pending further action by the Agency, etc. More specifically:

Petitions acted on and published in FR (these include those petitions which will appear in the next FR notice; approx. mid-Nov.)	-52%	(85)
Petitions mooted by amendments to the regulations	-13.4%	(22)
Petitions deferred pending further action by the Agency	-8.5%	(14)
Petitions reviewed and decision made to delist but not yet published in FR (Informal Delisting)	-14.6%	(24)
Petition is for non-listed waste, thus delisting is inappropriate	-5%	(8)
Petition withdrawn or to be denied by the Agency	-3.6%	(6)
Petitions deferred to State for delisting	-2.4%	(4)
Petition delisted by State with concurrence by EPA	-0.5%	(1)

Additional information was requested and not yet received for most of the remaining delisting petitions which has delayed the processing of these petitions. The remaining petitions along with others received subsequent to October 7, 1981 are expected to be processed over the upcoming months.

Please call me or Myles Morse if you have any questions concerning a particular facility for delisting (755-9187).

Attachment

a - In response to comments, waste K063 has been removed from the list. However, since these lime treatment sludges are generated from the treatment of a listed hazardous waste (K062), they are considered to be hazardous wastes (§261.3(c)(2)).

b - In response to comments, tannery wastes (K053 to K059) have been removed from the list of hazardous wastes (see FR 72037, October 30, 1980); thus delisting is inappropriate

c - Removed from hazardous waste list (see 45 FR 74890-892, November 12, 1980).

d - Petitioner is requesting Agency to de-list non-listed waste stream; letter will be sent to petitioner indicating petition can not be processed

e - As a result of a clarification to the listing published in the FR on Nov. 12, 1980, the petitioner's waste no longer meets the listing description (i.e., steel foundries were not intended to be included for waste K061); thus delisting is inappropriate

f - Not used

g - In response to comments, 2,4-D has been moved from §261.33(e) to §261.33(f) and thus 2,4-D empty bags are no longer hazardous; thus delisting is inappropriate

h - As a result of a clarification to the lisiting published in the FR on Nov. 12, 1980, the petitioner's waste no longer meets the listing description (i.e., non-cyanide quenching process waste were not intended to be included for waste F010); thus exclusion is inappropriate

i - As a result of a clarification to the listing published in the FR on Nov. 12, 1980, the petitioner's waste no longer meets the listing description (i.e., sulfuric acid anodizing of aluminum is not included in waste F006); thus delisting is inappropriate

j - In response to comment, waste F016 has been removed from the list. (FR November 12, 1980).

k - Removed from list of commercial chemical products (see 45 FR 78532, November 25, 1980).

l - Petitioner has been notified that a temporary exclusion will be granted; Regional Office of Enforcement has been informed, thus waste may be presently handled as a non-hazardous waste.

m - Although this state has interim authorization EPA has processed this petition since it was submitted prior to the state's interim authorization and applies to any situation that would bring the waste back under federal jurisdication. (e.g., interstate carriers).

n - Petitioner has been notified that a conditional temporary will be granted; Regional Office of Enforcement has been informed that the waste may be presently handled as non-hazardous under the conditions specified.

o - Waste K062 is listed as hazardous because of its corrosive nature and the presence of hexavalent chromium and lead; however, the Agency has learned that in stainless steel pickling operations, nickel may also be present in significant concentrations (nickel is not currently listed as a constituent of concern for waste K062); therefore, the Agency has requested EP data for nickel from stainless steel pickling operations; if EP data shows the levels of nickel are significant, the Agency will consider amending the listing for this segment of the industry; in the meantime, the Agency will not formally delist this waste until the nickel extraction data is submitted.

p - Although this state has interim authorization EPA has processed this petition at the specific request of the petitioner; exclusions apply to any situation that would bring the waste back under federal jurisdication. (e.g., interstate carriers).

A.2 Part A/
Interim Status

PA

Ohio EPA
State of Ohio Environmental Protection Agency

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

George V. Voinovich
Governor

Donald R. Schregardus
Director

July 13, 1994

RECEIVED
WMD RECORD CENTER
AUG 01 1994

Mr. John Berent
Senior Environmental Engineer
Delco Chassis Division, GMC
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Berent:

REGARDING EPA ID NO.: OHD001880442

LOCATION OF INSTALLATION: 2509 Hayes Avenue, Sandusky, Ohio 44870

In response to your request, the following information has been updated:

Facility Name changed to Delco Chassis Division, GMC

Regulated Waste Activity changed to Large Quantity Generator

Installation Contact Person - John Berent, 419/627-7081

If you have any questions, please contact Maria T. Velalis at 614/644-2939.

Sincerely,

Thomas E. Crepeau

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

TEC/mtv

c: U.S. EPA, Region V

Printed on recycled paper

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

MAY 25 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Robert Hare, Environmental Engineer
General Motors Corporation - New
Departure Hyatt - Sandusky Ohio
2509 Hayes Avenue
Sandusky, Ohio 44870

RE: Interim Status Acknowledgement USEPA ID No. OHD 001 880 442
FACILITY NAME: GMC NEW DEPARTURE HYATT SANDUSKY OHIO

Dear Mr. Hare:

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

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

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

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

Sincerely yours,

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

Enclosure

cc: L. A. Lanning

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

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

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

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

For Official Use Only

Comments

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

I. Name of Installation

NEW DEPARTURE HYATT DIV GMC

II. Installation Mailing Address

Street or P.O. Box: 2509 HAYES AVENUE

City or Town	State	ZIP Code
SANDUSKY	OH	44870

III. Location of Installation

Street or Route Number: 2509 HAYES AVENUE

City or Town	State	ZIP Code
SANDUSKY	OH	44870

IV. Installation Contact

Name and Title *(last, first, and job title)*	Phone Number *(area code and number)*
HARE ROBERT, ENV ENG	419 627 7076

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership *(enter code)*
GENERAL MOTORS CORP.	P

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

A. Hazardous Waste Activity

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

B. Used Oil Fuel Activities

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

RECEIVED APR 30 1986 JWD - AIS U.S. EPA REGION V

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

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

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

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

IX. First or Subsequent Notification

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

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

C. Installation's EPA ID Number: OHD001880442

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

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

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

1	2	3	4	5	6
F 0 0 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 sources your installation handles. Use additional sheets if necessary.

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

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

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

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

49	50	51	52	53	54

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

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

XI. Certification

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

Signature	Name and Official Title *(type or print)*	Date Signed
Clifford J. Smith	Clifford J. Smith, Plant Manager	4/15/86

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 → OHD001880442 REACKNOWLEDGEMENT

GMC NEW DEPARTURE HYATT SANDUSKY OHIO
2509 HAYES AVENUE
SANDUSKY OH 44870

INSTALLATION ADDRESS → 2509 HAYES AVENUE
SANDUSKY OH 44870

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

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

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

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

INSTALLATION'S EPA I.D. NO.

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

000141 AUG 22 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	APPROVED	DATE RECEIVED (yr., mo., & day)
F OHD001880442 T/A C 1	A	800818

GMC GENERAL MOTORS CORP.

I. NAME OF INSTALLATION

New Departure Hyatt Sandusky Plant

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 2509 Hayes Avenue

CITY OR TOWN	ST.	ZIP CODE
4 Sandusky	OH	44870

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 2509 Hayes Avenue

CITY OR TOWN	ST.	ZIP CODE
6 Sandusky	OH	44870

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 Hare, Robert, Environmental Eng.	419-626-2120

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 General Motors Corporation

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.: OHD001880442

IX. DESCRIPTION OF HAZARDOUS WASTES

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

AUG 19 1980

I.D. – FOR OFFICIAL USE ONLY

S		T/A	C
W	0400018804[illegible]		1

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

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

1	2	3	4	5	6
F001	F006	F007	F008	F009	F010
7	**8**	**9**	**10**	**11**	**12**
F017					

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
P029	P030	P106	U002	U013	U019
37	**38**	**39**	**40**	**41**	**42**
U112	U154	U159	U161	U204	U220
43	**44**	**45**	**46**	**47**	**48**
U226	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
Charles A Rowley	C. A. Rowley Plant Manager	8-13-80

DETACH

DETACH

EPA Form 8700-12 (6-80) REVERSE

O: WATER
CC: RF
FREEMAN
WMB

New Departure Hyatt

SUBJECT Delegation of Authority to Sign Permit Applications Under EPA Permit Programs

DATE May 18, 1988

TO T. J. Ruble
Manager Operations
Sandusky Plant

As provided under 40 CFR 122.22, 144.32, 233.6, and 270.11 of the "Environmental Permit Regulations", the position of manager operations is hereby designated as my duly authorized representative for New Departure Hyatt Division, Sandusky, Ohio. As such, the manager operations is authorized to sign all permit applications, all reports required by permits, and other information requested by EPA or a corresponding state or municipal agency, submitted for the following programs:

1. National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act (40 CFR 122)

2. Underground Injection Control Program of the Safe Drinking Water Act (40 CFR 144)

3. Dredge or Fill (404) Program of the Clean Water Act (40 CFR 233)

4. Hazardous Waste Permit Program of the Resource Conservation and Recovery Act (40 CFR 270)

In the absence of the individual occupying the designated position due to vacation, illness, or other reasons, the individual temporarily responsible for the operation of the facility or activity is my duly authorized representative.

Rudolph A. Schlais, Jr.
General Manager

cc: Valdas V. Adamkus
Regional Administrator

Richard Shank
Director, Ohio EPA

C. L. Michael, Jr.
New Departure Hyatt

RECEIVED
MAY 23 1988
U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

NEW DEPARTURE HYATT
DIVISION OF GENERAL MOTORS

RECEIVED
APR 29 1986
SOLID WASTE BRANCH
U.S. EPA, REGION V

April 18, 1986

Ms. Lisa Pierard
U.S. E.P.A., Region V
RCRA Activities
Post Office Box A3587
Chicago, Illinois 60690

RE: New Departure Hyatt Bearings, A Division of General Motors Corporation; Qualification for Interim Status

CTSD PA

Dear Ms. Pierard:

On March 19, 1986, this facility received a letter from U.S. E.P.A. announcing that the delisting previously granted to this plant for the F006 waste generated from our operations were no longer effective. Although it is General Motors' contention that this announcement was ineffective, we have determined to observe the agency's announcement and make every effort to come into compliance with applicable RCRA regulations for interim status facilities. Of particular importance to our facility is the need to secure interim status for the two (2) surface impoundments in which this plant manages effluent from its electroplating operations. While the capacity of these surface impoundments is relatively large, the actual amount of F006 waste managed in the ponds is quite small. Nevertheless, in light of the regulatory change which has rendered these units subject to RCRA permitting requirements, we have determined that it would be prudent to qualify the units for interim status pursuant to RCRA (See 42 U.S.C. §6925 (e) (1) (A) (ii), §6925 (e) (3)).

Accordingly, enclosed is this facility's notification of hazardous waste activity pursuant to Section 3010 of RCRA and a modified Part A application reflecting the addition of the two (2) surface impoundments to those units being operated at our plant. With the submission of these two (2) documents, it is our understanding that we have now qualified these facilities for interim status. If you have any questions regarding our filings, please contact Mr. Robert W. Hare at this facility at (419) 627-7076.

Very truly yours,

Clifford J. Smith
Plant Manager

RECEIVED
APR 30 1986
SWB - MIS
U.S. EPA, REGION V

Encl

cc: Ohio E.P.A., Division of Solid and Hazardous Waste, Columbus, Ohio
David Ferguson, Northwest District Office, Ohio E.P.A.

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.)

I. EPA I.D. NUMBER

S F | T/A | C D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

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

II. POLLUTANT CHARACTERISTICS

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

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

III. NAME OF FACILITY

C 1 SKIP GMC NEW DEPARTURE HYATT

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
C 2 HARE ROBERT ENV ENGINEER	419 627 7076

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

C 3 2509 HAYES AVENUE

B. CITY OR TOWN	C. STATE	D. ZIP CODE
C 4 SANDUSKY	OH	44870

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

C 5 2509 HAYES AVENUE

B. COUNTY NAME

ERIE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
C 6 SANDUSKY	OH	44870	

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

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

A. FIRST	B. SECOND
3562 (specify) Roller and Ball Bearings Complete	3714 (specify) Motor Vehicle Parts and Accessories
C. THIRD	**D. FOURTH**
3465 (specify) Automotive Job Stampings	(specify)

VIII. OPERATOR INFORMATION

A. NAME: GMC NEW DEPARTURE HYATT SANDUSKY OHIO

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

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

D. PHONE (area code & no.): A 419 627 7076

E. STREET OR P.O. BOX: 2509 HAYES AVENUE

F. CITY OR TOWN: SANDUSKY

G. STATE: OH

H. ZIP CODE: 44870

IX. INDIAN LAND

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

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): N 2IC00011	D. PSD (Air Emissions from Proposed Sources): P NA
B. UIC (Underground Injection of Fluids): U NA	E. OTHER (specify): 9 (specify)
C. RCRA (Hazardous Wastes): R OHD001880442	E. OTHER (specify): 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.

XII. NATURE OF BUSINESS (provide a brief description)

New Departure Hyatt , Division of General Motors Corporation is a bearings manufacturer which operates various metal machining and finishing operations.

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
Clifford J. Smith Plant Manager	Clifford J. Smith	4/15/86

COMMENTS FOR OFFICIAL USE ONLY

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

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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

I. EPA I.D. NUMBER

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

FOR OFFICIAL USE ONLY

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

II. FIRST OR REVISED APPLICATION

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

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

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

C 8 (15) — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
73 – 74	75 – 76	77 – 78

☐ 2. NEW FACILITY *(Complete item below.)* (74)

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

YR.	MO.	DAY
73 – 74	75 – 76	77 – 78

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

☒ 1. FACILITY HAS INTERIM STATUS (72)

☐ 2. FACILITY HAS A RCRA PERMIT (73)

III. PROCESSES – CODES AND DESIGN CAPACITIES

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

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

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

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

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

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

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

S C D U P T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	15 – 18	19 – 27	28	29 – 32		15 – 18	19 – 27	28	29 – 32
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	2,200	G		7				
	S 0 4	2,000,000	G		8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

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

S01 - Barrel Storage Area - 2,200 gallons

S04 - Flow through retention ponds - surface impoundment - 2,000,000 gallons

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 O H D 0 0 1 8 8 0 4 4 2 — T/A: 1	W DUP — T/A: 2 — DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

ITEM 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	D 0 0 1	3,000	P	S 0 1	
2	D 0 0 2	3,000	P	S 0 1	
3	F 0 0 1	3,600	P	S 0 1	
4	D 0 0 7	5,000	P	S 0 1	
5	F 0 0 5	2,500	P	S 0 1	
6	F 0 0 6	500	T	S 0 4	
7	D 0 0 8			S 0 1	Included in Item #4 above.
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
4					
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.

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

S													T/A	C
F	O	H	D	Ø	Ø	1	8	8	Ø	4	4	2		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).*

VI. PHOTOGRAPHS

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

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
8 2 4 2 5 5 N	Ø 4 1 2 6 Ø Ø W

VIII. FACILITY OWNER

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

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

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

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

IX. OWNER CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Clifford J. Smith Plant Manager	Clifford J Smith	4/15/86

X. OPERATOR CERTIFICATION

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

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

 CONTINUE ON PAGE 5

(Print or type in the unshaded areas only. Use one character per box.) Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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

I. EPA I.D. NUMBER: F O H D 0 0 1 8 8 0 4 4 2

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. 4 5 MO. 1 1 DAY 1 5

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)*

[X] 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 T/A I

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	2,220	G		7				
					8				
3					9				
4					10				

II. PROCESSES *(continued)*

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

V. DESCRIPTION OF HAZARDOUS WASTES

. 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.

. 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.

. 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.

. 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.

OTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by ore 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.

XAMPLE 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 r 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 e 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 00 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	K054	900	P	T03 D80	
	D002	400	P	T03 D80	
X-3	D001	100	P	T03 D80	
X-4	D002				included with above

CONTINUE ON PAGE 3

Continued from page 2.

NOTE: Photocopy this page before completing if 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
WOHD001880442 T/A 1 C	W DUP T/A 2 C 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	F001	816	K	S01	
2	P029	960	K	S01	
3	U013	3,600	K	S01	
4	U226	---	K	S01	Included in Line 1
5	D007	5,000	K	S01	
6	F005	3,492	K	S01	
7	D002	2,250	K	S01	
8	D008	---			Included in Item #5
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.

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

F O H D 0 0 1 8 8 0 4 4 2 T/A C 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)*.

VI. PHOTOGRAPHS

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

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
8 2 / 4 2 / 5 5 N	0 4 1 / 2 6 / 0 0 W

VIII. FACILITY OWNER

☐ 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.)*

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

IX. OWNER CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
L. A. Lanning	L. A. Lanning	2/17/84

X. OPERATOR CERTIFICATION

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

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

CONTINUE ON PAGE 5

Chris

NEW DEPARTURE HYATT BEARINGS
DIVISION OF GENERAL MOTORS

Note: OHD-001-880-442
G, TSD, PA

September 1, 1982

RECEIVED 9/17/82

RECEIVED
SEP 18 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

Mr. Karl J. Kelpisch, Jr.
Chief
Waste Management Branch
U.S. E.P.A., Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Kelpitsch:

Enclosed please find a revised Form - 3 Hazardous Waste Permit Application for New Departure-Hyatt Bearings Division of General Motors Corporation, Sandusky, Ohio.

The revised form has several changes from the original application which are as follows:

Item III-C

Line 1 - Changed design capacity of T01 to 240,300 gallons from 540 gallons per hour.

Line 2 - Changed design capacity of T04 to 9,000 gallons per hour from 416,000 gallons. (Process descriptions were also changed.)

Item IV

Line 1 - Changed estimated annual quantity to D001 to 500 ton from 220 tons.

Line 2 - Changed estimated annual quantity of D002 to 3,000 tons from 10,000 tons.

Lines 3, 6, and 7 - Waste designated F007, F008, and F009 were removed. F007 - F012 waste descriptions have been amended to limit the wastes to those sources where cyanide is used in the process. Cyanide is not used in plating process at this facility.

Line 4 - Column "C" changed unit measure from "D" to "P".

Line 8 - Wastes designated as F017 and F018 were removed. F017 and F018 have been removed from the non-specific source listing.

2509 HAYES AVENUE • SANDUSKY, OHIO 44870 • PHONE (419) 627-7000

Lines 9 - 12 - Wastes designated U002, U019, U154, and U204 were removed. These items were suspected present but proven otherwise.

Line 5 - (Revised application) wastes designated as D007 was added. This designation applied to plating wastes that do not utilize cyanide in the process (Chromium plating).

If you have any questions regarding these changes or the Part B Annual Report, please call the writer at (419) 627-7076.

Sincerely,

Robert W. Hare

Robert W. Hare
Environmental Engineer

dor
Encl

cc: Mr. John Clark, State of Ohio

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 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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

I. EPA I.D. NUMBER

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

1 2 - 12 13 14 15

FOR OFFICIAL USE ONLY

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

II. FIRST OR REVISED APPLICATION

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

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

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

C 8 15 — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
73 74	75 76	77 78

☐ 71 2. NEW FACILITY *(Complete item below.)*

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

YR.	MO.	DAY
73 74	75 76	77 78

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

☒ 72 1. FACILITY HAS INTERIM STATUS

☐ 72 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.

S													T/A	C
C	D	U	P											1

1 2 - 12 13 14 15

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
	16 - 18	19 - 27	28	29 - 32		16 - 18	19 - 27	28	29 - 32
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	T01	240,300	G		7				
	T04	9,000	E		8				
3	S01	2,200	G		9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

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

T01

Acid Reservoir
Alkali Reservoir - 240,300 Gallons
API Separator

T04

Chromium Reduction Basin
Primary Clarifier - 102,456 Gallons
Final Clarifier

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

FED. EPA I.D. No.

Continued from page 2. OHD 00188044?

NOTE: Photocopy this page before completing if yo ve more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
S W O H D 0 0 1 8 8 0 4 4 2 T/A C 1	S W DUP T/A C 2 DUP

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	D001	500	T	T04	
2	D002	3000	T	T04	
3	F001	4500	P	S01	
4	U226			S01	Included in above.
5	D007	9000	P	S01	
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
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17					
18					
19					
20					
21					
22					
23					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

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

FED. EPA I.D. No.
OHD 001880442

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

F 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)*.

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)*. No change.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
82 42 554	041 26 00 W

VIII. FACILITY OWNER

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

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

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

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

IX. OWNER CERTIFICATION

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

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

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
L. A. Lanning		

CONTINUE ON PAGE 5

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 128

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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

I. EPA I.D. NUMBER

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

1 2 - 13 14 15

FOR OFFICIAL USE ONLY

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

II. FIRST OR REVISED APPLICATION

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

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

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

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

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

C	YR.	MO.	DAY
8	4 5	1 1	1 5
15	73 74	75 76	77 78

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

YR.	MO.	DAY
73 74	75 76	77 78

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

[ ] 1. FACILITY HAS INTERIM STATUS 72

[ ] 2. FACILITY HAS A RCRA PERMIT 72

III. PROCESSES — CODES AND DESIGN CAPACITIES

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

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

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

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

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

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

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

S		T/A	C
C	DUP		1

1 2 - 13 14 15

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 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. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	16 - 18	19 - 27	28	29 - 32		16 - 18	19 - 27	28	29 - 32
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	T 0 1	540	E		7				
2	T 0 4	416,000	U		8				
3	S 0 1	2,200	G		9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

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

T04 - Industrial Waste Treatment System - 216,000 GPD

T04 - Sanitary Waste Treatment System - 200,000 GPD

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 yc ve more than 26 wastes to list.

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EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
S W O H D 0 0 1 8 8 0 4 4 2	T/A C 1	S W DUP	T/A C 2 DUP

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	D001	220	T	T01	T04			
2	D002	10,000	T	T01	T04			
3	F009							Included in Above
4	F001	4,500	D	T04				
5	U226							Included in Above
6	F007	81	T	T01	T04			
7	F008	2	T	T04				
8	F017	1,500	P	S01				
9	U002	60	P	T04				
10	U019	10	P	T04				
11	U154	1,400	P	T04				
12	U204	1	P	T04				
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WAS 3 (continued)

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

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

S													T/A	C
F	0	H	D	0	0	1	8	8	0	4	4	2		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).*

VI. PHOTOGRAPHS

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

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
8 2 / 4 2 / 5 5 N	0 4 1 / 2 6 / 0 0 W

VIII. FACILITY OWNER

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

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

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

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

IX. OWNER CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
L. A. Lanning	L. A. Lanning	11/14/82

X. OPERATOR CERTIFICATION

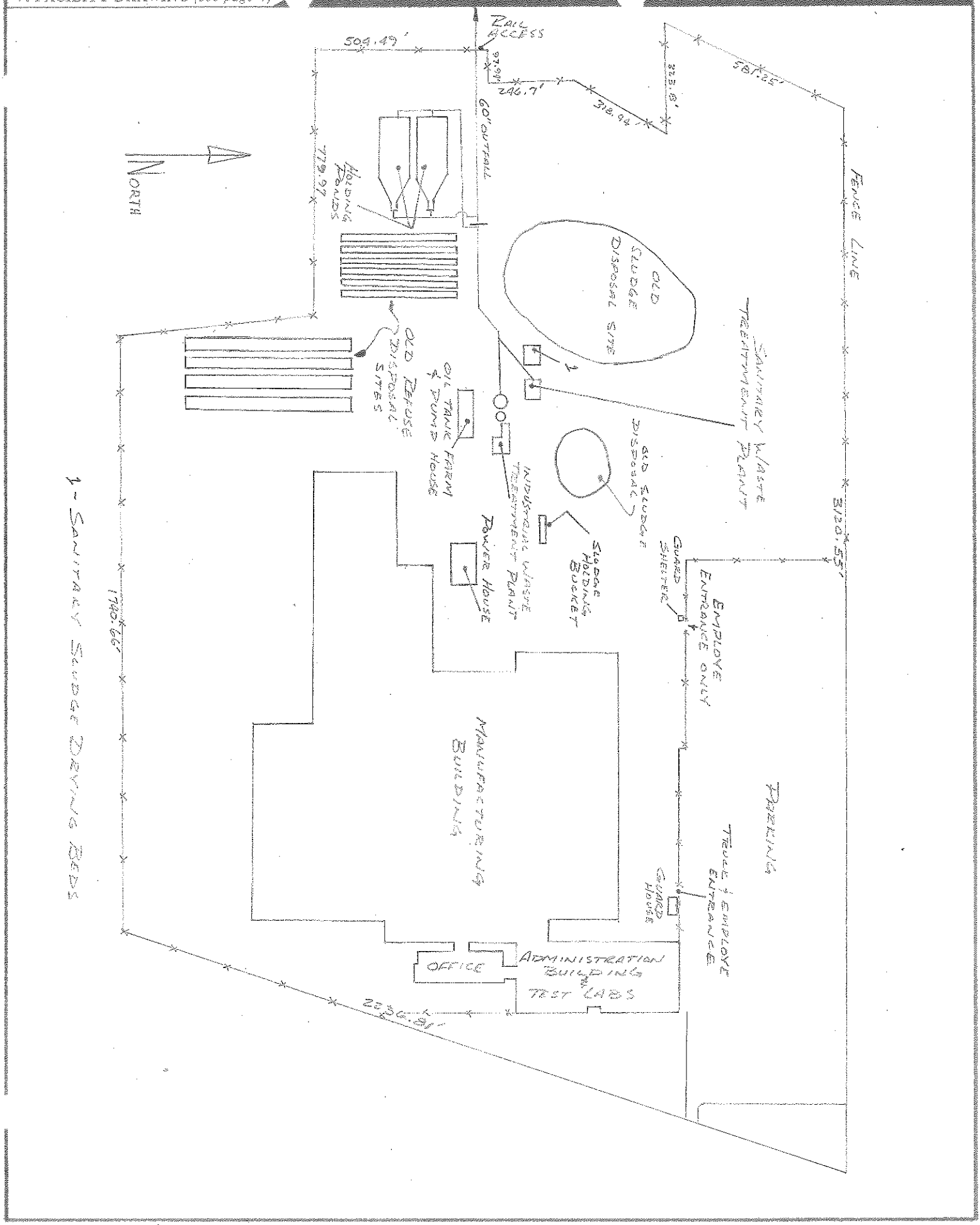
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true,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

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

 CONTINUE ON PAGE 5

Continued from page 4.

V. FACILITY DRAWING *(see page 4)*



8C1

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

Form Approved OMB No. 158-R0175

128

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S		T/A	C
F	O H D 0 0 1 8 8 0 4 4 2		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)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges to waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		NA
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge to waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

C 1 SKIP GMC-NEW DEPARTURE HYATT-SANDUSKY OHIO

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
C 2 HARE ROBERT ENV ENGINEER	419 627 7076

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

C 3 2509 HAYES AVENUE

B. CITY OR TOWN	C. STATE	D. ZIP CODE
C 4 SANDUSKY	OH	44870

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

C 5 2509 HAYES AVENUE

B. COUNTY NAME

ERIE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
C 6 SANDUSKY	OH	44870	043

NOV 14 1980

EPA Form 3510-1 (6-80)

NOV 14 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

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

A. FIRST	B. SECOND
3562 (specify) Roller and Ball Bearings Complete	3714 (specify) Motor Vehicle Parts & Accessories
C. THIRD	**D. FOURTH**
3465 (specify) Automotive Job Stampings	(specify)

VIII. OPERATOR INFORMATION

A. NAME: GMC NEW DEPARTURE HYATT SANDUSKY OHIO

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

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

Answer: P (specify)

D. PHONE (area code & no.): A 419 627 7076

E. STREET OR P.O. BOX: 2509 HAYES AVENUE

F. CITY OR TOWN: SANDUSKY

G. STATE: OH

H. ZIP CODE: 44870

IX. INDIAN LAND

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

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	N	CD*211
B. UIC (Underground Injection of Fluids)	U	NA
C. RCRA (Hazardous Wastes)	R	NA
D. PSD (Air Emissions from Proposed Sources)	P	NA
E. OTHER (specify)		(specify)
E. OTHER (specify)		(specify)

XI. MAP

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

XII. NATURE OF BUSINESS (provide a brief description)

New Departure-Hyatt Bearings, Division of General Motors Corporation is a bearings manufacturer which operates various metal machining and finishing operations.

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
L. A. Lanning General Manager	L. A. Lanning	11/14/82

COMMENTS FOR OFFICIAL USE ONLY

C

A.4 Closure/Post-Closure

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

RECEIVED
OCT 02 1989
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Richard F. Celeste
Governor

CLOSURE PLAN DISAPPROVAL
Issuance Date September 28, 1989
Effective Date October 30, 1989

CERTIFIED MAIL

September 28, 1989

Re: Closure Plan
GMC - New Departure Hyatt
OHD 001 880 442

Robert W. Hare
Environmental Engineer
GMC - New Departure Hyatt
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Hare:

On November 3, 1988, GMC - New Departure Hyatt submitted to Ohio EPA a closure plan for a hazardous waste container storage area located at 2509 Hayes Avenue, Sandusky, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that GMC - New Departure Hyatt's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of GMC - New Departure Hyatt in accordance with OAC Rule 3745-66-12. The public comment period extended from December 26, 1988, to January 30, 1989. No comments were received by Ohio EPA in this matter.

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

The closure plan submitted to Ohio EPA by GMC - New Departure Hyatt is hereby disapproved (see Attachment A).

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

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

Sincerely,

Richard L. Shank, Ph.D.
Director

RLS:fhk:1962U

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

ATTACHMENT A

GENERAL MOTORS CORPORATION
NEW DEPARTURE HYATT DIVISION
SANDUSKY, OHIO

EPA I.D. NO. OHD 001 880 442

GENERAL CLOSURE REQUIREMENTS

1. Closure Performance Standard: [40 CFR 265.111 and OAC 3745-66-11]

The closure plan does not demonstrate how closure of the storage facility will control, minimize, or eliminate post-closure escape of hazardous waste, hazardous constituents, contaminated run-off, or waste decomposition products to the ground or surface waters or to the atmosphere for the following reasons:

- The closure plan does not specify adequate criteria for judging the extent of decontamination necessary (see Deficiency No. 18). New Departure Hyatt must identify all hazardous constituents stored and specify Ohio EPA rinseate clean standards for RCRA closures as the criteria for determining the extent of equipment and concrete surface decontamination necessary.

- The closure plan does not provide a detailed description of decontamination steps and procedures for cleaning equipment and structures (Deficiency Nos. 19 and 20). New Departure Hyatt must include a decontamination plan and a personnel health and safety plan.

- The closure plan does not provide a detailed description of the removal of hazardous waste residues (see Deficiency No. 21). New Departure Hyatt must provide a description of how all decontamination rinseate and contaminated concrete will be managed in accordance with 40 CFR Part 262 and OAC 3745-52.

- The closure plan does not include an adequate description of the methods for sampling and testing to demonstrate the success of decontamination (see Deficiency No. 22). New Departure Hyatt must include a detailed sampling and testing plan to demonstrate that all equipment and structures have been successfully decontaminated.

Therefore, revise the closure plan according to the detailed comments listed below:

CONTENT OF CLOSURE PLAN

2. Description of Partial and/or Final Closure of the Facility: [40 CFR 265.112(b)(1) and OAC 3745-66-12(b)(1)]

The closure plan must specify whether closure of the container storage area is a partial or final facility closure. The closure plan must identify all hazardous waste management units referenced on the Part A application. If other units exist, indicate in the closure plan that this is partial closure of the facility. If this is a partial closure, state in the closure plan the names of the other units remaining in operation. If not, state that the New Departure Hyatt storage facility is the only RCRA regulated unit under EPA I.D. Number OHD001880442 and is to be closed at its maximum extent of operations, therefore, this closure is a final closure.

In addition, provide a topographic or county map with the location of the facility, and a detailed map or diagram of the facility with each hazardous waste management unit clearly located and identified. Specify map scale.

3. Identification of Maximum Extent of Operations: [40 CFR 265.112(b)(2) and OAC 3745-66-12(b)(2)]

   Specify in the closure plan how long the storage facility has been in operation. In addition, include a drawing showing the relationship of the storage facility to other points or structures on the facility property. Specify the scale of the drawings.

4. Estimate of Maximum Inventory of Hazardous Waste: [40 CFR 265.112(b)(3) and OAC 3745-66-12(B)(3)]

   The closure cost estimate is based on a maximum waste inventory of 40 drums. The statement of 4 drums in the closure cost estimate is not adequate detail for an estimate of the maximum inventory of hazardous waste. The closure plan must describe the maximum inventory of waste (volume and type) in storage and/or treatment at any one time during the life of the facility. Revise the closure plan to include a complete, detailed list of hazardous wastes by chemical name and EPA hazardous waste number, and the maximum volume of each waste ever in storage and/or treatment at any one time during the life of the facility. Trade names or common names should not be used; generic chemical names should be used to clearly indicate a waste's hazardous constituents. Calculations showing the derivation of the maximum inventory must be provided for all forms of the inventory.

5. Detailed Description of Removal of Hazardous Waste Inventory: [40 CFR 265.112(b)(3) and 265.114 and OAC 3745-66-12(B)(3) and 3745-66-14]

   The closure plan states remaining wastes in storage will be transported off-site. Certain hazardous wastes have been banned from land disposal. See the following final rules under 40 CFR 268 for wastes which are prohibited from land disposal and their prohibited effective date: 50 FR 40572, Nov. 7, 1986, for solvent and dioxin containing waste ; 52 FR 25760, July 8, 1987, for "California list" wastes; and 53 FR 31138,

August 17, 1988, for first third restricted wastes. New Departure Hyatt must determine if any of the hazardous waste inventory is a restricted waste. If the hazardous waste inventory contains restricted waste, revise the closure plan to specify how New Departure Hyatt will comply with the applicable proceeding rules prior to land disposal of the restricted hazardous waste. Refer to Deficiency No. 17.

6. Identification of and Type of Off-Site Hazardous Waste Management Unit(s): [40CFR 265.112(b)(3) and OAC 3745-66-12(B)(3)]

   The closure schedule in the closure plan states remaining wastes in storage will be removed to Environmental Waste Control, Inc. or another vendor for disposal. Add a statement to the closure plan to clarify that Environmental Waste Control or another vendor will be a commercial hazardous waste disposal facility. Also, state in the closure plan that once New Departure Hyatt has selected a commercial hazardous waste disposal facility, New Departure Hyatt will provide the name of the facility and its EPA I.D. number to Janet Leite, Ohio EPA, NWDO, and Randy Meyer, Ohio EPA, CO., prior to off-site disposal.

7. Decontamination and Removal of Hazardous Waste Residues: [40 CFR 265.112(b)(4) and 265.114 and OAC 3756-66-12(B)(4) and 3745-66-14]

   The closure plan must identify all areas requiring decontamination, and must describe in detail the steps necessary to decontaminate equipment, structures, and soils during final closure. Revise the closure plan to include:

   - A list of potentially contaminated equipment (e.g., forklifts, pallets, racks). Identify where the equipment will be decontaminated.
   - Criteria for determining the extent of decontamination needed to satisfy the closure performance standard.
   - Procedures for cleaning, removing, or disposing contaminated equipment and structures.
   - Methods for sampling, testing, and disposing of contaminated concrete.

   Refer to Deficiency Nos. 19 through 22.

8. Detailed Description of Other Activities Necessary for Closure: [40 CFR 265.112(b)(5) and OAC 3745-66-12(B)(5)]

Provide a detailed description of how and where hazardous wastes will be managed during the closure period until the storage facility is certified closed.

9. Schedule for Closure of Each Unit and Final Closure: [40 CFR 265.112(b)(6-7) and OAC 3745-66-12(B)(6-7)]

The closure schedule identifies some closure activities and presents the number of calendar days from the date of approval of the closure plan for each activity. It is not clear from the closure schedule whether each activity will begin on the specified number of days from approval of the closure plan (i.e., waste inventory removal will begin 30 days after approval of the closure plan), or be completed within the specified number of days from approval of the closure plan (i.e., waste inventory removal will be completed within 30 days after approval of the closure plan). In addition, the closure schedule does not show the total time required to complete each closure activity. In order to allow the tracking of the progress of closure, revise the closure schedule to include a milestone chart that clearly delineates when each closure activity will begin and the total length of time (number of days or weeks) required to complete each activity. In addition to the closure activities already identified, revise the closure schedule to include the following additional closure activities and the length of time required to complete each activity:

- Decontamination of equipment used in operating the storage facility;
- Analytical testing for success of equipment decontamination;
- Management of decontamination rinseate from equipment and concrete;
- Removal of contaminated concrete, if applicable;
- Analytical testing for success of removal of contaminated concrete, if applicable; and
- Management of contaminated concrete, if applicable; and

In addition, add a statement to the closure plan that New Departure Hyatt will notify Ohio EPA, NWDO, at least five (5) days in advance of any critical activities (i.e., facility decontamination) so that an Ohio EPA inspector can be present to observe these activities.

Include the expected starting date for using the container storage facility as a less than 90-day accumulation area.

10. Amendment of Closure Plan: [40 CFR 265.112(c) and OAC 3745-66-12(C)]

Add a statement to the closure plan stating that if an unexpected event occurs during closure which requires modification to the closure plan, New Departure Hyatt will submit an amended closure plan to the Director of Ohio EPA within 30 days after the unexpected event occurs.

11. Schedule for Beginning Closure: [40 CFR 265.112(d)(2) and OAC 3745-66-12(D)(2)]

Clarify the closure schedule to show that closure will begin within 30 days after the storage facility receives the final volume of hazardous waste.

12. Waste Treated, Removed or Disposed of Within 90 Days and Extensions of Time Periods: [40 CFR 265.113(a) and OAC 3745-66-13(A)]

Clarify the closure schedule to show that all hazardous wastes will be removed from the site within 90 days after approval of the closure plan.

13. Timeframes for Demonstrations for Extensions: [40 CFR 265.113(c) and OAC 3745-66-13(c)]

Add a statement to the closure plan stating that if closure can not be completed within 180 days, New Departure Hyatt will submit a request for extension of the closure period to the Director of Ohio EPA at least 30 days prior to the expiration of the 180 day period.

Certification of Closure and Survey Plat

14. Certification of Closure: [40 CFR 265.115 and OAC 3745-66-15]

The closure plan states that closure will be certified by the Owner's designated representative and independent registered professional engineer once the storage facility is determined to be "cleaned". In addition to this acknowledgement, revise the closure plan to include the following statements. Within 60 days of completion of closure of the storage facility, the owner/operator will submit to the Director of Ohio EPA, by registered mail, a certification that the hazardous waste storage facility has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by both the owner/operator and the independent registered professional engineer. The owner/operator's and independent registered professional engineer's certifications of closure will follow the signature requirements found in OAC 3745-50-42. The owner/operator's certification statement will follow the exact wording found in OAC 3745-50-42(D). Documentation supporting the independent registered professional engineers certification will be furnished to the Director of Ohio EPA upon request until the Director of Ohio EPA releases the owner/operator from the financial assurance requirements for closure under OAC 3745-66-43.

Ohio EPA policy requires Ohio EPA inspections of the closed hazardous waste management unit at the completion of all closure activities, or when closure certification is received from the owner/operator.

15. Detailed Description of How the Container Storage Area Will be Closed: [40 CFR 265.112(b)(1) and OAC 3745-66-12(B)(1)]

The closure plan does not provide an adequate detailed description on how the container storage area will be closed. Revise the closure plan to provide additional details on the closure of the hazardous waste storage facility. The description of the closure process must contain sufficient detail so that: 1) the reasoning behind and procedures for closure are understandable; 2)the closure schedule can be justified; 3)closure cost estimates can be substantiated; and 4)financial assurance can be judged to be adequate. The following items summarize the major items that must be addressed.

- Provide an estimate of the maximum volume of hazardous waste inventory ever in storage at any one time during the life of the facility and identify the hazardous wastes stored by chemical name and EPA hazardous waste number (see Deficiency No. 4)

- Include a health and safety plan to be implemented during hazardous waste inventory removal and decontamination for closure personnel (see Deficiency Nos. 17 and 20).

- Provide a detailed description of the steps needed to remove or decontaminate all contaminated equipment and structures. Include the following: criteria for determining the extent of decontamination necessary; procedures for cleaning equipment and structures; description of removal of contaminated waste residues; and methods to demonstrate the success of decontamination (see modification No. 18 through 22).

16. Detailed Description of Removal of Hazardous Waste Inventory: [40 CFR 265.112(b)(3) and 265.114 and OAC 3745-66-12(B)(3) and 3745-66-14]

The closure plan must include a detailed description of how the hazardous waste inventory will be managed during the closure period. Include details on how the waste will be removed, treated, transported, and disposed. The closure plan must clearly show that measures will be taken to protect all personnel involved in the removal of hazardous waste inventory. Revise the closure plan to include a personnel health and safety plan. The health and safety plan must include a description of the protective clothing and equipment to be worn by personnel during the removal of hazardous waste inventory. Refer to the following for guidance on the components of a health and safety plan: OSHA regulations for hazardous waste operations (29 CFR 1910;120, Federal Register, Vol. 51, No. 244, pp. 45654-45675) and Chapter 3 of the Occupation Safety and Health Guidance Manual for Hazardous Waste Site Activities(NIOSH, 1985).

New Departure Hyatt must determine if any of the hazardous waste inventory is a restricted waste under 40 CFR 268. If the hazardous waste inventory contains restricted waste, revise the closure plan to specify how New Departure Hyatt will comply with the applicable restriction rules prior to land disposal of the restricted hazardous waste. See Deficiency No. 5.

Revise the closure plan to include details on how New Departure Hyatt will meet all DOT pre-transport regulations pertaining to packaging (49 CFR Part 172), and placarding (40 CFR Part 172, Subpart F). In addition, state how New Departure Hyatt will comply with the RCRA manifest (40 CFR Part 262, Subpart B and OAC 3745-52-20 through 23) and recordkeeping requirements (40 CFR Part 262, Subpart D and OAC 3745-52-40 through 43) for each shipment of hazardous waste.

17. Criteria for Determining the Extent of Decontamination Necessary:[40 CFR 265.112(b)(4)and 265.114 and OAC 3745-66-12(B)(4) and 3745-66-14]

The closure plan states that the storage facility concrete floor will be cleaned with a detergent and water. The decontamination rinseate will be analyzed for the EP Toxicity Metals and all RCRA waste solvents that were stored in the facility. The decontamination rinseate will not be considered hazardous when a sample contains less than 1 mg/l of any RCRA regulated solvents or less than 5 mg/l total chromium. The criteria are not adequate for determining the extent of decontamination necessary.

The criteria for determining the extent of decontamination necessary should be based on those hazardous constituents stored in the storage facility. Consequently, the closure plan should include a waste sampling and analysis plan to identify all Appendix VIII hazardous constituents stored at the storage facility. Results from the waste analysis should be included in the closure plan submitted to the Regional Administrator as part of the closure activities. Revise the closure plan to include a waste sampling and analysis plan which specifies the following:

- The Appendix VIII hazardous constituents to be analyzed and the rationale for their selection. If there are definitive records on the hazardous wastes managed at the storage facility throughout its history, the list of hazardous constituents to be analyzed may be derived from the records. If definitive records do not exist, the entire Appendix VIII scan should be performed for constituents for which analytical procedures have been approved by the Agency.

- The number of samples obtained and the rationale for their selection.

- Sampling and analytical procedures found in U.S.EPA's Publication SW-846(third edition), "Test Methods for Evaluating Solid Waste, Physical /Chemical Methods" will be used. Where more than one analytical method is specified, New Departure Hyatt will use the method with the lowest detection limit.

- Chain of custody procedures for samples obtained.

- Evidence to show that the laboratory analyzing the samples has a complete QA/QC program similar to the QA/QC procedures in the Ohio EPA/Ohio Department of Health's "RCRA Laboratory Quality Assurance Project Plan" (1983).

- Results from the waste analysis.

For those hazardous constituents identified in the waste analysis, the criteria for determining the extent of equipment and concrete surface decontamination necessary will be based on the Ohio EPA rinseate clean standards for RCRA closures (Ohio EPA inter-office memo, October 6, 1988). Revise the closure plan to specify the Ohio EPA rinseate clean standards which are as follows:

- The public drinking water maximum contaminant level (MCL) for hazardous waste constituents as promulgated in 40 CFR 141.11 and OAC 3745-81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics will be used;

- If a MCL is not available, then the maximum contaminant level goal (MCLG) as promulgated in 40 CFR 141.50 will be used; or

- If neither an MCL or an MCLG is available, 1 mg/l will be used.

- If the MCL or MCLG is less than the contaminant's analytical detection limit using methods found U.S. EPA's SW-846 (third edition), the SW-846 analytical detection limit will be used as the clean standard.

- For characteristic wastes, the rinseate must not be hazardous by characteristics specified in 40 CFR 261 and OAC 3745-51.

The closure plan states any concrete found to be contaminated will be scarified and placed in drums for off-site disposal. Revise the closure plan to specify the criteria to be used to judge the extent of contaminated concrete removal which may be necessary. Note: Scarification of the concrete floor is not required unless the rinseate clean standards outlined above cannot be achieved in two or three efforts.

18. Detailed Description of Decontamination Steps: [40 CFR 265.112(b)(4) and 265.114 and OAC 3745-66-12(B)(4) and 3745-66-14]

The closure plan does not provide a detailed description of the procedures for decontamination of the storage facility. Revise the closure plan to include more detail as follows:

- Provide a list of equipment (e.g., forklifts) to be decontaminated. Indicate where (i.e., decontamination stations) the equipment will be decontaminated and how.

- First the closure plan states that the concrete surface will be cleaned until the stated detergent contaminant levels have been achieved. Then the closure plan states that any concrete found to be contaminated will be scarified and placed into drums for off-site disposal. Specify what constitutes testing for concrete contamination. In addition, specify the criteria for determining if the concrete is contaminated, the number of samples to be obtained, and sampling and analytical procedures to be used. Also, provide a more detailed description on scarification.

- Provide a detailed description on how decontamination rinseate will be managed.

19. Procedures for Cleaning Equipment and Structures and Removing Contaminated Soils: [40 CFR 265.112(b)(4) and 265.111 OAC 3745-66-12(B)(4) and 3745-66-11]

The closure plan must include a decontamination plan which establishes decontamination procedures for personnel and equipment. Information about decontamination methods and procedures can be found in the following two references: Chapter 10 of the Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities (NIOSH, 1985), and the Guide for Decontaminating Buildings, Structures, and Equipment at Superfund Sites (U.S. EPA, 1985b). The decontamination plan should include the following:

- Procedures to prevent contamination of clean areas or further equipment contamination.

- A listing of equipment, including personal protective gear, equipment, and vehicles, to be decontaminated.

- The number and layout of decontamination stations.

- A listing of decontamination equipment needed. Decontamination equipment selection should also consider that same equipment's suitability for decontamination or disposal.

- Decontamination methods to be used. The closure plan does not state the method to be used to decontaminate equipment. Specify the type of method for cleaning equipment. The decontamination method selected must be compatible with the hazardous substances being removed and with the clothing or equipment being decontaminated, and must not pose a direct hazard to closure personnel. The closure plan states that a detergent, Detrex 44, and water will be used to clean the concrete surface within the storage facility. Demonstrate that the cleaning agent is suitable for the types of wastes stored.

- Methods for testing for the success of decontamination (see Deficiency No. 22).

- Methods and procedures to minimize closure personnel contact with contaminants (see Health and Safety Plan).

- Emergency decontamination procedures.

- An estimate of the volume of decontamination rinseate and contaminated concrete.

- Description of measures to collect, contain, and handle decontamination rinseate and contaminated concrete as hazardous wastes in compliance with RCRA.

The closure plan must include a health and safety plan which provides guidelines and procedures to ensure the health and safety of personnel who will be performing the decontamination of the storage facility. Refer to the following for guidance on the components of a personnel health and safety plan: OSHA regulations for hazardous waste operations (29 CFR 1910;120, Federal Register, Vol. 51, No. 244, pp. 45654-45675) and Chapter 3 of the Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities(NIOSH, 1985K). The health and safety plan should include the following:

- A description of air monitoring which will be performed during equipment decontamination and within the storage facility during the concrete surface washing and scarification.

- A description of the protective clothing and equipment, including respirators, to be worn by personnel during facility decontamination.

20. Detailed Description of Removal of Hazardous Waste Residues: [40 CFR 265.112(b)(4) and 265.114 OAC 3745-66-12(B)(4) and 3745-66-14]

The closure plan does not include a description of the methods and procedures for removal of decontamination rinseate. Identify the type of off-site hazardous waste management unit to be used for management of decontamination rinseate. Also, state in the closure plan that once New Departure Hyatt has selected a commercial hazardous waste disposal facility, New Departure Hyatt will provide the name of the facility and its EPA I.D. number to Janet Leite, Ohio EPA, NWDO, and Randy Meyer, Ohio EPA, CO, prior to off-site disposal.

The closure plan states contaminated concrete will be disposed at the Fondessy secure landfill in Oregon, Ohio. Include in the closure plan the EPA I.D. number of the Fondessy secure landfill.

By removing decontamination rinseate and contaminated concrete during closure, New Departure Hyatt becomes a generator of hazardous waste and must handle the waste in accordance with all applicable requirements in 40 CFR Part 262 and OAC 3745-52. Revise the closure plan to include details on how New Departure Hyatt will meet all DOT pre-transport regulations pertaining to packaging (40 CFR Parts 173, 178, and 179), labeling and marking (49 CFR Part 172), and placarding (49 CFR Part 172, Subpart F). In addition, state how New Departure Hyatt will comply with the RCRA manifest (40 CFR Part 262, Subpart B and OAC 3745-52-20 through 23) and recordkeeping requirements (40 CFR Part 262, Subpart D and OAC 3745-52-40 through 43) for each shipment of hazardous waste.

21. Methods for Sampling and Testing to Demonstrate Success of Decontamination: [40 CFR 265.112(b)(4) and 265.114 and OAC 3745-66-12(B)(4) and 3745-66-14]

The closure plan states that the storage facility will be determined to be "cleaned" based on the chromium level found in water samples using the analytical and sampling methods specified in U.S. EPA's Publication EPA-600, "Methods for Chemical Analysis of Water and Waste" as compared to levels specified for EP Toxicity Test Procedures. This is not sufficient. Revise the closure plan to include a sampling and testing plan to demonstrate the success of decontamination. The sampling and testing plan must specify the following:

- The number of rinseate samples to be obtained from equipment and concrete surface cleaning and the rationale for their selection. The closure plan states contaminated concrete will be scarified and placed in drums for off-site disposal. Specify the number of concrete samples to be obtained to determine that all contaminated concrete has been removed and the rationale for their selection.

- Rinseate samples will be collected and analyzed using procedures found in U.S. EPA's Publication SW-846 (third edition), "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods." In addition, state where more than one analytical method is specified, New Departure Hyatt will use the method with the lowest detection limit. A justification must be provided for any analytical methods specified other than those in SW-846. Specify the sampling and analytical procedures to be used for concrete.

- New Departure Hyatt must use Ohio EPA rinseate clean standards for RCRA closures (Ohio EPA inter-office memo, October 6, 1988) for determining the success of equipment and concrete surface decontamination. The sampling and testing plan must include the following:

    - Identification of all hazardous constituents stored at the storage facility based on the waste analysis (see Deficiency No. 18).

- The public drinking water maximum contaminant level (MCL) for hazardous waste constituents as promulgated in 40 CFR 141.11 and OAC 3745-81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics will be used in determining the success of decontamination.

- If a MCL is not available, then the maximum contaminant level goal (MCLG) as promulgated in 40 CFR 141.50 will be used.

- If neither an MCL or an MCLG is available, 1 mg/l will be used.

- If the MCL or MCLG is less than the contaminant's analytical detection limit using methods found U.S. EPA's SW-846 (third edition), the SW-846 analytical detection limit will be used as the clean standard.

- For characteristic wastes, the rinseate will not be hazardous by characteristics specified in 40 CFR 261 and OAC 3745-51.

Scarification of the concrete floor is not required unless the rinseate clean standards outlined above cannot be achieved in two or three efforts. Specify how the scarified concrete will be determined to be decontaminated.

o Chain of custody procedures for all samples obtained.

o Evidence to show that the laboratory analyzing the samples has a complete QA/QC program similar to the QA/QC procedures in the Ohio EPA/Ohio Department of Health;s "RCRA Laboratory Quality Assurance Project Plan" (1983).

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COMPLETENESS/TECHNICAL REVIEW
OF THE
INTERIM STATUS CLOSURE PLAN

FOR

GENERAL MOTORS CORPORATION
NEW DEPARTURE HYATT DIVISION
SANDUSKY, OHIO

EPA I.D. NO. OHD001880442

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January 1989

COMPLETENESS/TECHNICAL REVIEW
INTERIM STATUS CLOSURE PLAN
[40 CFR PART 265]

GENERAL MOTORS CORPORATION
NEW DEPARTURE HYATT DIVISION
SANDUSKY, OHIO

EPA I.D. NO. OHD001880442

GENERAL COMMENTS

A completeness/technical review of the hazardous waste storage facility closure plan submitted by the New Departure Hyatt Division of the General Motors Corporation has been conducted. The source of information for this review was:

- Closure Plan for Hazardous Waste Storage Facility, October 18, 1988.

New Departure Hyatt has not identified the hazardous wastes stored at the facility. RCRA hazardous wastes must be identified in order to determine if the facility has been successfully decontaminated, and to determine that wastes have been disposed in compliance with the land disposal restrictions final rules. Consequently, New Departure Hyatt must provide a detailed list of hazardous wastes by chemical name and EPA hazardous waste number, and include in the closure plan the results from waste analysis sampling. In addition, New Departure Hyatt must determine if any of the hazardous waste inventory is a restricted waste, and if so, specify in the closure plan how they will comply with the land disposal restrictions final rules.

New Departure Hyatt must provide detailed information on hazardous waste management procedures in the interim until the container storage unit is certified closed in compliance with 40 CFR Subpart G regulations and less than 90-day accumulation status of the container storage unit can begin. Also, state the expected starting date for using the container storage as a less 90-day accumulation area.

The closure plan for the hazardous waste storage facility is substantially deficient in several areas. These deficiencies are discussed in the attached specific comments.

COMPLETENESS/TECHNICAL REVIEW
INTERIM STATUS CLOSURE PLAN
[40 CFR PART 265]

GENERAL MOTORS CORPORATION
NEW DEPARTURE HYATT DIVISION
SANDUSKY, OHIO

EPA I.D. NO. OHD001880442

SPECIFIC COMMENTS

I. GENERAL CLOSURE REQUIREMENTS

I.A. Closure Performance Standard: [40 CFR 265.111]

The closure plan does not demonstrate how closure of the storage facility will control, minimize, or eliminate post-closure escape of hazardous waste, hazardous constituents, contaminated run-off, or waste decomposition products to the ground or surface waters or to the atmosphere for the following reasons:

- The closure plan does not specify adequate criteria for judging the extent of decontamination necessary (see deficiency comment II.B-6). New Departure Hyatt must identify all hazardous constituents stored and specify Ohio EPA rinseate clean standards for RCRA closures (Ohio EPA inter-office memo, October 6, 1988) as the criteria for determining the extent of equipment and concrete surface decontamination necessary.

- The closure plan does not provide a detailed description of decontamination steps and procedures for cleaning equipment and structures (see deficiency comments II.B-7 and II.B-8). New Departure Hyatt must include a decontamination plan and a personnel health and safety plan.

- The closure plan does not provide a detailed description of the removal of hazardous waste residues (see deficiency comment II.B-9). New Departure Hyatt must provide a description of how all decontamination rinseate and contaminated concrete will be managed in accordance with 40 CFR Part 262.

- The closure plan does not include an adequate description of the methods for sampling and testing to demonstrate the success of decontamination (see deficiency comment II.B-10). New Departure Hyatt must include a detailed sampling and testing plan to demonstrate that all equipment and structures have been successfully decontaminated.

Therefore, revise the closure plan accordingly.

I.B. Content Of Closure Plan

I.B-1. Description of Partial and/or Final Closure of the Facility: [40 CFR 265.112(b)(1)]

The closure plan must specify whether closure of the container storage area is a partial or final facility closure. The closure plan must identify all hazardous waste management units referenced on the Part A application. If other units exist, indicate in the closure plan that this is partial closure of the facility. If this is a partial closure, state in the closure plan the names of the other units remaining in operation. If not, state that the New Departure Hyatt storage facility is the only RCRA regulated unit under EPA I.D. Number OHD001880442 and is to be closed at its maximum extent of operations, therefore, this closure is a final closure.

In addition, provide a topographic or county map with the location of the facility, and a detailed map or diagram of the facility with each hazardous waste management unit clearly located and identified. Specify map scale.

I.B-2. Identification of Maximum Extent of Operations: [40 CFR 265.112(b)(2)]

Specify in the closure plan how long the storage facility has been in operation. In addition, include a drawing showing the relationship of the storage facility to other points or structures on the facility property. Specify the scale of the drawing.

I.B-3. Estimate of Maximum Inventory of Hazardous Waste: [40 CFR 265.112(b)(3)]

The closure cost estimate is based on a maximum waste inventory of 40 drums. The statement of 40 drums in the closure cost estimate is not adequate detail for an estimate of the maximum inventory of hazardous waste. The closure plan must describe the maximum inventory of wastes (volume and type) in storage and/or treatment at any one time during the life of the facility. Revise the closure plan to include a complete, detailed list of hazardous wastes by chemical name and EPA hazardous waste number, and the maximum volume of each waste ever in storage and/or treatment at any one time during the life of the facility. Trade names or common names should not be used; generic chemical names should be used to clearly indicate a waste's hazardous constituents. Calculations showing the derivation of the maximum inventory must be provided for all forms of the inventory.

I.B-4. Detailed Description of Removal of Hazardous Waste Inventory: [40 CFR 265.112(b)(3) and 265.114]

The closure plan states remaining wastes in storage will be transported off-site. Certain hazardous wastes have been banned from land disposal. See the following final rules for wastes which are prohibited from land disposal and their prohibited effective date: 51 FR 40572, Nov. 7, 1986, for solvent and dioxin containing wastes; 52 FR 25760, July 8, 1987, for "California list" wastes; and 53 FR 31138, August 17, 1988, for first third restricted wastes. New Departure Hyatt must determine if any of the hazardous waste inventory is a restricted waste. If the

hazardous waste inventory contains restricted waste, revise the closure plan to specify how New Departure Hyatt will comply with the applicable preceding rules prior to land disposal of the restricted hazardous waste. Refer to deficiency comment II.B-4.

I.B-5. Identification of and Type of Off-Site Hazardous Waste Management Unit(s): [40 CFR 265.112(b)(3)]

The closure schedule in the closure plan states remaining wastes in storage will be removed to Environmental Waste Control, Inc. or another vendor for disposal. Add a statement to the closure plan to clarify that Environmental Waste Control or another vendor will be a commercial hazardous waste disposal facility. Also, state in the closure plan that once New Departure Hyatt has selected a commercial hazardous waste disposal facility, New Departure Hyatt will submit the following information to the Regional Administrator prior to off-site disposal:

- The name of the facility and the EPA I.D. number;
- The operating status of the facility (i.e., interim status or permitted facility); and
- A description of the disposal methods used at the facility.

I.B-6. Decontamination and Removal of Hazardous Waste Residues: [40 CFR 265.112(b)(4) and 265.114]

The closure plan must identify all areas requiring decontamination, and must describe in detail the steps necessary to decontaminate equipment, structures, and soils during final closure. Revise the closure plan to include:

- A list of potentially contaminated equipment (e.g., forklifts, pallets, racks). Identify where the equipment will be decontaminated.
- Criteria for determining the extent of decontamination needed to satisfy the closure performance standard.
- Procedures for cleaning, removing, or disposing contaminated equipment and structures.
- Methods for sampling, testing, and disposing of contaminated concrete.

Refer to comments II.B-7 through II.B-10.

I.B-7. Detailed Description of Other Activities Necessary for Closure: [40 CFR 265.112(b)(5)]

Provide a detailed description of how and where hazardous wastes will be managed during the closure period until the storage facility is certified closed (i.e., can become a less than 90-day accumulation facility).

Provide a detailed description for air monitoring to be conducted inside the storage

facility during decontamination. Refer to deficiency comment II.B-8.

I.B-8. Schedule for Closure of Each Unit and Final Closure: [40 CFR 265.112(b)(6-7)]

The closure schedule identifies some closure activities and presents the number of calendar days from the date of approval of the closure plan for each activity. It is not clear from the closure schedule whether each activity will begin on the specified number of days from approval of the closure plan (i.e., waste inventory removal will begin 30 days after approval of the closure plan), or be completed within the specified number of days from approval of the closure plan (i.e., waste inventory removal will be completed within 30 days after approval of the closure plan). In addition, the closure schedule does not show the total time required to complete each closure activity. In order to allow the tracking of the progress of closure, revise the closure schedule to include a milestone chart that clearly delineates when each closure activity will begin and the total length of time (number of days or weeks) required to complete each activity. In addition to the closure activities already identified, revise the closure schedule to include the following additional closure activities and the length of time required to complete each activity:

- Decontamination of equipment used in operating the storage facility;
- Analytical testing for success of equipment decontamination;
- Management of decontamination rinseate from equipment and concrete;
- Removal of contaminated concrete, if applicable;
- Analytical testing for success of removal of contaminated concrete, if applicable;
- Management of contaminated concrete, if applicable; and
- Critical points during closure when an independent registered professional engineer (PE) or the PE's representative will be present.

In addition, add a statement to the closure plan that New Departure Hyatt will notify the Regional Administrator or Ohio EPA in advance of any critical activities (i.e., facility decontamination) so that a U.S. EPA or Ohio EPA inspector can be present to observe these activities.

Include the expected starting date for using the container storage facility as a less than 90-day accumulation area.

I.B-9. Amendment of Closure Plan: [40 CFR 265.112(c)]

Add a statement to the closure plan stating that if an unexpected event occurs during closure which requires modification to the closure plan, New Departure Hyatt will submit an amended closure plan to the Regional Administrator within 30 days after the unexpected event occurs.

In addition, amend the closure plan to address the deficiencies in this review.

I.B-11. Schedule for Beginning Closure: [40 CFR 265.112(d)(2)]

Clarify the closure schedule to show that closure will begin within 30 days after the storage facility receives the final volume of hazardous waste.

I.B-12. Waste Treated, Removed or Disposed of Within 90 Days and Extensions of Time Periods: [40 CFR 265.113(a)]

Clarify the closure schedule to show that all hazardous wastes and residues (i.e., hazardous waste inventory, decontamination rinseate, and contaminated concrete, if applicable) will be removed from the site within 90 days after approval of the closure plan.

I.B-13. Closure Completed Within 180 Days and Extensions of Time Periods: [40 CFR 265.113(b)]

Clarify the closure schedule to show that all closure activities, including certification of closure, will be completed within 180 days after approval of the closure plan.

I.B-14. Timeframes for Demonstrations for Extensions: [40 CFR 265.113(c)]

Add a statement to the closure plan stating that if closure can not be completed within 180 days, New Departure Hyatt will submit a request for extension of the closure period to the Regional Administrator at least 30 days prior to the expiration of the 180 day period.

I.C. Certification Of Closure And Survey Plat

I.C-1. Certification of Closure: [40 CFR 265.115]

The closure plan states that closure will be certified by the Owner's designated representative and independent registered professional engineer once the storage facility is determined to be "cleaned". In addition to this acknowledgement, revise the closure plan to include the following statements. Within 60 days of completion of closure of the storage facility, the owner/operator will submit to the Regional Administrator, by registered mail, a certification that the hazardous waste storage facility has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by both the owner/operator and the independent registered professional engineer. The owner/operator's and independent registered professional engineer's certifications of closure will follow the signature requirements found in OAC 3745-50-42. The owner/operator's certification statement will follow the exact wording found in OAC 3745-50-42(D). Documentation supporting the independent registered professional engineers certification will be furnished to the Regional Administrator upon request until the Regional Administrator releases the owner/operator from the financial assurance requirements for closure under 40 CFR 265.143(h).

Ohio EPA policy requires Ohio EPA inspections of the closed hazardous waste management unit at the completion of all closure activities, or when closure certification is received from the owner/operator.

I.D. Closure Cost Estimate

I.D-1. Cost Estimate When Closure is Most Expensive: [40 CFR 265.142(a)]

The closure cost estimate presented in the closure plan includes a subtotal cost for several general closure activities with no detail cost breakdown as to tasks or support for the subtotal costs presented. Provide a revised cost estimate that includes a separate line item and cost for each task performed under the general closure activities including additional tasks as follows:

- Removal of hazardous waste inventory:
  - Compliance with land disposal restrictions final rules, if applicable (see deficiency comment I.B-4);
  - Transportation; and
  - Disposal.
- Facility decontamination:
  - Protective clothing for decontamination personnel;
  - Equipment decontamination; and
  - Concrete decontamination.
- Testing for success of decontamination:
  - Analytical testing of equipment decontamination rinseate and
  - Analytical testing of concrete decontamination rinseate.
- Management of decontamination rinseate from equipment and concrete and contaminated concrete, if applicable:
  - Transportation and
  - Disposal.
- Expenses associated with having the independent professional engineer present at critical times during closure.

Support each line item estimate with calculations based on unit prices, labor hours, equipment rental rates, disposal fees, and volume or quantity figures.

The closure cost estimate must be based on the costs of having a third party, neither a parent nor a subsidiary of the owner/operator, close the facility. Include fees and contingencies for a third party closing the facility.

I.D-2. Adjustments for Inflation: [40 CFR 265.142(b)]

Add a statement to the closure plan stating that the closure cost estimate will be updated annually to reflect increases due to inflation. State that cost adjustments will be made in accordance with the following schedule:

- Within 30 days after the close of the firm's fiscal year if the owner/operator is using the financial test or corporate guarantee; or

- Within 60 days prior to the anniversary date of establishment of financial instruments if the owner/operator is using other financial instruments.

In addition, state the inflation factor published by the U.S. Department of Commerce in its "Survey of Current Business" will be used.

I.D-3. Revisions to Closure Cost Estimate: [40 CFR 265.142(c)]

Revise the closure cost estimate as specified in deficiency comment I.D-2.

I.E. Financial Assurance For Closure

Provide a copy of the established financial assurance mechanism for facility closure. The value of the financial assurance mechanism must be sufficient to cover the cost of the closure plan as it is revised according to these comments. The mechanism must be one of the following options:

- Closure Trust Fund [40 CFR 265.143(a)];

- Surety Bond Guaranteeing Payment to Closure Trust Fund [40 CFR 265.143(b)];

- Closure Letter of Credit [40 CFR 265.143(c)];

- Closure Insurance [40 CFR 265.143(d)];

- Financial Test and Corporate Guarantee [40 CFR 265.143(e)];

- Multiple Financial Mechanisms [40 CFR 265.143(f)]; and

- Financial Mechanisms for Multiple Facilities [40 CFR 265.143(g)].

I.F. Liability Coverage

I.F-1. Sudden Accidental Occurrences: [40 CFR 265.147(a)]

The owner/operator is required to maintain liability coverage for sudden accidental occurrences throughout the closure period until the Regional Administrator receives certification that closure has been completed in accordance with the approved closure plan and the Regional Administrator notifies the owner/operator in writing that they are no longer required to maintain liability coverage. Liability coverage must be maintained for sudden accidental occurrences in the amount of at least one million dollars per occurrence with an annual aggregate of at least two million dollars, exclusive of legal defense costs. Provide documentation of compliance with applicable liability requirements for sudden accidental occurrences. Liability coverage may be demonstrated in one of the following ways:

- Liability Insurance [40 CFR 265.147(a)(1)];

- Financial Test or Corporate Guarantee [40 CFR 265.147(a)(2)];
- Letter of Credit [40 CFR 265.147(a)(3)];
- Surety Bond [40 CFR 265.147(a)(4)];
- Trust Fund [40 CFR 265.147(a)(5)]; and
- Combinations of Insurance, Financial Test, Guarantee, Letter of Credit, Surety Bond, and Trust Fund [40 CFR 265.147(a)(6)].

II. CLOSURE OF CONTAINER STORAGE AREA

II.B. Content Of Closure Plan

II-B-1. Detailed Description of How the Container Storage Area Will be Closed: [40 CFR 265.112 (bA)(1)]

The closure plan does not provide an adequate detailed description on how the container storage area will be closed. Revise the closure plan to provide additional details on the closure of the hazardous waste storage facility. The description of the closure process must contain sufficient detail so that: 1) the reasoning behind and procedures for closure are understandable; 2) the closure schedule can be justified; 3) closure cost estimates can be substantiated; and 4) financial assurance can be judged to be adequate. The following items summarize the major items that must be addressed. These items are described in greater detail in the remaining deficiency comments.

- Provide an estimate of the maximum volume of hazardous waste inventory ever in storage at any one time during the life of the facility and identify the hazardous wastes stored by chemical name and EPA hazardous waste number (see deficiency comment II.B-3).
- Include a health and safety plan to be implemented during hazardous waste inventory removal and decontamination for closure personnel (see deficiency comments II.B-4 and II.B-8).
- Provide a detailed description of the steps needed to remove or decontaminate all contaminated equipment and structures. Include the following: criteria for determining the extent of decontamination necessary; procedures for cleaning equipment and structures; description of removal of contaminated waste residues; and methods to demonstrate the success of decontamination (see deficiency comments II.B-6 through II.B-10).

II.B-4. Detailed Description of Removal of Hazardous Waste Inventory: [40 CFR 265.112(b)(3) and 265.114]

The closure plan must include a detailed description of how the hazardous waste inventory will be managed during the closure period. Include details on how the waste will be removed, treated, transported, and disposed. The closure plan must

clearly show that measures will be taken to protect all personnel involved in the removal of hazardous waste inventory. Revise the closure plan to include a personnel health and safety plan. The health and safety plan must include a description of the protective clothing and equipment to be worn by personnel during the removal of hazardous waste inventory. Refer to the following for guidance on the components of a health and safety plan: OSHA regulations for hazardous waste operations (29 CFR 1910;120, Federal Register, Vol. 51, No. 244, pp. 45654-45675) and Chapter 3 of the Occupational Safety and Health Guidance Manual for Hazardous Waste Site Acitivities (NIOSH, 1985).

New Departure Hyatt must determine if any of the hazardous waste inventory is a restricted waste. If the hazardous waste inventory contains restricted waste, revise the closure plan to specify how New Departure Hyatt will comply with the applicable restriction rules prior to land disposal of the restricted hazardous waste. See deficiency comment I.B-4.

Revise the closure plan to include details on how New Departure Hyatt will meet all DOT pre-transport regulations pertaining to packaging (49 CFR Parts 173, 178, and 179), labeling and marking (49 CFR Part 172), and placarding (49 CFR Part 172, Subpart F). In addition, state how New Departure Hyatt will comply with the RCRA manifest (40 CFR Part 262, Subpart B) and recordkeeping requirements (40 CFR Part 262, Subpart D) for each shipment of hazardous waste.

II.B-6. Criteria for Determining the Extent of Decontamination Necessary: [40 CFR 265.112(b)(4) and 265.114]

The closure plan states that the storage facility concrete floor will be cleaned with a detergent and water. The decontamination rinseate will be analyzed for the EP Toxicity Metals and all RCRA waste solvents that were stored in the facility. The decontamination rinseate will not be considered hazardous when a sample contains less than 1 mg/l of any RCRA regulated solvents or less than 5 mg/l total chromium. This criteria is not adequate for determining the extent of decontamination necessary.

The criteria for determining the extent of decontamination necessary should be based on those hazardous constituents stored in the storage facility. Consequently, the closure plan should include a waste sampling and analysis plan to identify all Appendix VIII hazardous constituents stored at the storage facility. Results from the waste analysis should be included in the closure plan submitted to the Regional Administrator as part of the closure activities. Revise the closure plan to include a waste sampling and analysis plan which specifies the following:

- The Appendix VIII hazardous constituents to be analyzed and the rationale for their selection. If there are definitive records on the hazardous wastes managed at the storage facility throughout its history, the list of hazardous constituents to be analyzed may be derived from the records. If definitive records do not exist, an entire Appendix VIII scan should be performed for constituents for which analytical procedures have been approved by the Agency.

- The number of samples obtained and the rationale for their selection.

- Sampling and analytical procedures found in U.S. EPA's Publication SW-846 (third edition), "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" will be used. Where more than one analytical method is specified, New Departure Hyatt will use the method with the lowest detection limit.

- Chain of custody procedures for samples obtained.

- Evidence to show that the laboratory analyzing the samples has a complete QA/QC program similar to the QA/QC procedures in the Ohio EPA/Ohio Department of Health's "RCRA Laboratory Quality Assurance Project Plan" (1983).

- Results from the waste analysis.

For those hazardous constituents identified in the waste analysis, the criteria for determining the extent of equipment and concrete surface decontamination necessary will be based on the Ohio EPA rinseate clean standards for RCRA closures (Ohio EPA inter-office memo, October 6, 1988). Revise the closure plan to specify the Ohio EPA rinseate clean standards which are as follows:

- The public drinking water maximum contaminant level (MCL) for hazardous waste constituents as promulgated in 40 CFR 141.11 and OAC 3745-81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics will be used;

- If a MCL is not available, then the maximum contaminant level goal (MCLG) as promulgated in 40 CFR 141.50 will be used; or

- If neither an MCL or an MCLG is available, 1 mg/l will be used.

- If the MCL or MCLG is less than the contaminant's analytical detection limit using methods found U.S. EPA's SW-846 (third edition), the SW-846 analytical detection limit will be used as the clean standard.

- For characteristic wastes, the rinseate must not be hazardous by characteristics specified in 40 CFR 261 and OAC 3745-51.

The closure plan states any concrete found to be contaminated will be scarified and placed in drums for off-site disposal. Revise the closure plan to specify the criteria to be used to judge the extent of contaminated concrete removal which may be necessary.

II.B-7. Detailed Description of Decontamination Steps: [40 CFR 265.112(b)(4) and 265.114]

The closure plan does not provide a detailed description of the procedures for decontamination of the storage facility. Revise the closure plan to include more detail as follows:

- Provide a list of equipment (e.g., forklifts) to be decontaminated. Indicate where (i.e., decontamination stations) the equipment will be decontaminated and how.

- First the closure plan states that the concrete surface will be cleaned until the stated detergent contaminant levels have been achieved. Then the closure plan states that any concrete found to be contaminated will be scarified and placed into drums for off-site disposal. Specify what constitutes testing for concrete contamination. In addition, specify the criteria for determining if the concrete is contaminated, the number of samples to be obtained, and sampling and analytical procedures to be used. Also, provide a more detailed description on scarification.

- Provide a detailed description on how decontamination rinseate will be managed.

II.B-8. Procedures for Cleaning Equipment and Structures and Removing Contaminated Soils: [40 CFR 265.112(b)(4) and 265.111]

The closure plan must include a decontamination plan which establishes decontamination procedures for personnel and equipment. Information about decontamination methods and procedures can be found in the following two references: Chapter 10 of the Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities (NIOSH, 1985), and the Guide for Decontaminating Buildings, Structures, and Equipment at Superfund Sites (U.S. EPA, 1985b). The decontamination plan should include the following:

- Procedures to prevent contamination of clean areas or further equipment contamination.

- A listing of equipment, including personal protective gear, equipment, and vehicles, to be decontaminated.

- The number and layout of decontamination stations.

- A listing of decontamination equipment needed. Decontamination equipment selection should also consider that same equipment's suitability for decontamination or disposal.

- Decontamination methods to be used. The closure plan does not state the method to be used to decontaminate equipment. Specify the type of method for cleaning equipment. The decontamination methods selected must be compatible with the hazardous substances being removed and with the clothing or equipment being decontaminated, and must not pose a direct hazard to closure personnel. The closure plan states that a detergent, Detrex 44, and water will be used to clean the concrete surface within the storage facility. Demonstrate that the cleaning agent is suitable for the types of wastes stored.

- Methods for testing for the success of decontamination (see deficiency comment II.B-10).

- Methods and procedures to minimize closure personnel contact with contaminants (see Health and Safety Plan).

- Emergency decontamination procedures.

- An estimate of the volume of decontamination rinseate and contaminated concrete.

- Description of measures to collect, contain, and handle decontamination rinseate and contaminated concrete as hazardous wastes in compliance with RCRA.

The closure plan must include a health and safety plan which provides guidelines and procedures to ensure the health and safety of personnel who will be performing the decontamination of the storage facility. Refer to the following for guidance on the components of a personnel health and safety plan: OSHA regulations for hazardous waste operations (29 CFR 1910;120, Federal Register, Vol. 51, No. 244, pp. 45654-45675) and Chapter 3 of the Occupational Safety and Health Guidance Manual for Hazardous Waste Site Acitivities (NIOSH, 1985). The health and safety plan should include the following:

- A description of air monitoring which will be performed during equipment decontamination and within the storage facility during the concrete surface washing and scarification.

- A description of the protective clothing and equipment, including respirators, to be worn by personnel during facility decontamination.

II.B-9. Detailed Description of Removal of Hazardous Waste Residues: [40 CFR 265.112(b)(4) and 265.114]

The closure plan does not include a description of the methods and procedures for removal of decontamination rinseate. Identify the type of off-site hazardous waste management unit to be used for management of decontamination rinseate. Also, state in the closure plan that once New Departure Hyatt has selected a commercial hazardous waste disposal facility, New Departure Hyatt will submit the following information to the Regional Administrator prior to off-site disposal:

- The name of the facility and the EPA I.D. number;

- The operating status of the facility (i.e., interim status or permitted facility); and

- A description of the disposal methods used at the facility.

The closure plan states contaminated concrete will be disposed at the Fondessey secure landfill in Oregon, Ohio. Include in the closure plan the EPA I.D. number and the operating status of the Fondessey secure landfill

By removing decontamination rinseate and contaminated concrete during closure,

New Departure Hyatt becomes a generator of hazardous waste and must handle the waste in accordance with all applicable requirements in 40 CFR Part 262. Revise the closure plan to include details on how New Departure Hyatt will meet all DOT pre-transport regulations pertaining to packaging (49 CFR Parts 173, 178, and 179), labeling and marking (49 CFR Part 172), and placarding (49 CFR Part 172, Subpart F). In addition, state how New Departure Hyatt will comply with the RCRA manifest (40 CFR Part 262, Subpart B) and recordkeeping requirements (40 CFR Part 262, Subpart D) for each shipment of hazardous waste.

II.B-10. Methods for Sampling and Testing to Demonstrate Success of Decontamination: [40 CFR 265.112(b)(4) and 265.114]

The closure plan states that the storage facility will be determined to be "cleaned" based on the chromium level found in water samples using the analytical and sampling methods specified in U.S. EPA's Publication EPA-600, "Methods for Chemical Analysis of Water and Waste" as compared to levels specified for EP Toxicity Test Procedures. This is not sufficient. Revise the closure plan to include a sampling and testing plan to demonstrate the success of decontamination. The sampling and testing plan must specify the following:

- The number of rinseate samples to be obtained from equipment and concrete surface cleaning and the rationale for their selection. The closure plan states contaminated concrete will be scarified and placed in drums for off-site disposal. Specify the number of concrete samples to be obtained to determine that all contaminated concrete has been removed and the rationale for their selection.

- Rinseate samples will be collected and analyzed using procedures found in U.S. EPA's Publication SW-846 (third edition), "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods". In addition, state where more than one analytical method is specified, New Departure Hyatt will use the method with the lowest detection limit. A justification must be provided for any analytical methods specified other than those in SW-846. Specify the sampling and analytical procedures to be used for concrete.

- New Departure Hyatt must use Ohio EPA rinseate clean standards for RCRA closures (Ohio EPA inter-office memo, October 6, 1988) for determining the success of equipment and concrete surface decontamination. The sampling and testing plan must include the following:

  - Identification of all hazardous constituents stored at the storage facility based on the waste analysis (see deficiency comment II.B-6).

  - The public drinking water maximum contaminant level (MCL) for hazardous waste constituents as promulgated in 40 CFR 141.11 and OAC 3745-81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics will be used in determining the success of decontamination.

  - If a MCL is not available, then the maximum contaminant level goal

(MCLG) as promulgated in 40 CFR 141.50 will be used.

- If neither an MCL or an MCLG is available, 1 mg/l will be used.

- If the MCL or MCLG is less than the contaminant's analytical detection limit using methods found U.S. EPA's SW-846 (third edition), the SW-846 analytical detection limit will be used as the clean standard.

- For characteristic wastes, the rinseate will not be hazardous by characteristics specified in 40 CFR 261 and OAC 3745-51.

Specify how the scarified concrete will be determined to be decontaminated.

- Chain of custody procedures for all samples obtained.

- Evidence to show that the laboratory analyzing the samples has a complete QA/QC program similar to the QA/QC procedures in the Ohio EPA/Ohio Department of Health's "RCRA Laboratory Quality Assurance Project Plan" (1983).

Facility Name: New Departure Hyatt Hazardous Waste Storage Facility
ID Number: OHD001880442

INTERIM STATUS CLOSURE AND POST-CLOSURE PLANS
[40 CFR 265 - Revised as of September 1, 1988]

		Provided (Y/N or NA)	Adequate (Y/N)	References	Comments
I.	GENERAL CLOSURE REQUIREMENTS				
A.	Closure Performance Standard [40 CFR 265.111]	N			See comment I.A.
B.	Content of Closure Plan				
B-1.	Description of partial and/or final closure of the facility [40 CFR 265.112(b)(1)]	Y	N	1(pp. 1-3)	See comment I.B-1.
B-2.	Identification of maximum extent of operations [40 CFR 265.112(b)(2)]	Y	N	1(p.1) & Drawing	See comment I.B-2.
B-3.	Estimate of maximum inventory of hazardous waste [40 CFR 265.112(b)(3)]	Y	N	1(p.3)	See comment I.B-3.
B-4.	Detailed description of removal of hazardous waste inventory [40 CFR 265.112(b)(3) and 265.114]	Y	N	1(pp.2-3)	See comment I.B-4.

New Departure Hyatt
Facility Name: Hazardous Waste Storage Facility
ID Number: OHD001880442

	Provided (Y/N or NA)	Adequate (Y/N)	References	Comments
B-5. Identification of and type of off-site hazardous waste management unit(s) [40 CFR 265.112(b)(3)]	Y	N	1(p.3)	See comment I.B-5.
B-6. Decontamination and removal of hazardous waste residues [40 CFR 265.112(b)(4) and 265.114]	Y	N	1(p.3)	See comment I.B-6.
B-7. Detailed description of other activities necessary for closure [40 CFR 265.112(b)(5)]	N			See comment I.B-7.
B-8. Schedule for closure of each unit and final closure [40 CFR 265.112(b)(6-7)]	Y	N	1(p.3)	See comment I.B-8.
B-9. Amendment of closure plan [40 CFR 265.112(c)]	N			See comment I.B-9.
B-10. Notification of partial and final closure [40 CFR 265.112(d)(1)]	Y	Y	1(p.1)	-

Facility Name: New Departure Hyatt Hazardous Waste Storage Facility
ID Number: OHD001880442

	Provided (Y/N or NA)	Adequate (Y/N)	References	Comments
B-11. Schedule for beginning closure [40 CFR 265.112(d)(2)]	Y	N	1(p.3)	See comment I.B-11.
B-12. Waste treated, removed or disposed of within 90 days and extensions of time periods [40 CFR 265.113(a)]	Y	N	1(p.3)	See comment I.B-12
B-13. Closure completed within 180 days and extensions of time periods [40 CFR 265.113(b)]	Y	N	1(p.3)	See comment I.B-13.
B-14. Timeframes for demonstrations for extensions [40 CFR 265.113(c)]	N			See comment I.B-14.
B-15. Disposal or decontamination of equipment, structures, and soils [40 CFR 265.114]	Y	N	1(p.3)	See comment I.B-6.
C. Certification of Closure and Survey Plat				
C-1. Certification of closure [40 CFR 265.115]	Y	N	1(p.2)	See comment I.C-1.

Facility Name: New Departure Hyatt Hazardous Waste Storage Facility
ID Number: OHD001880442

		Provided (Y/N or NA)	Adequate (Y/N)	References	Comments
C-2.	Survey plat [40 CFR 265.116]	NA			
D.	Closure Cost Estimate				
D-1.	Cost estimate when closure is most expensive [40 CFR 265.142(a)]	Y	N	1(p.3)	See comment I.D-1.
D-2.	Adjustments for inflation [40 CFR 265.142(b)]	N			See comment I.D-2.
D-3.	Revisions to closure cost estimate [40 CFR 265.142(c)]	N			See comment I.D-3.
E.	Financial Assurance for Closure	N			See comment I.E.
E-1.	Closure trust fund [40 CFR 265.143(a)]				
E-2.	Surety bond guaranteeing payment to closure trust fund [40 CFR 265.143(b)]				

NA = Not Applicable

Facility Name: New Departure Hyatt Hazardous Waste Storage Facility
ID Number: OHD001880442

		Provided (Y/N or NA)	Adequate (Y/N)	References	Comments
E-3.	Closure letter of credit [40 CFR 265.143(c)]				
E-4.	Closure insurance [40 CFR 265.143(d)]				
E-5.	Financial test and corporate guarantee [40 CFR 265.143(e)]				
E-6.	Multiple financial mechanisms [40 CFR 265.143(f)]				
E-7.	Financial mechanisms for multiple facilities [40 CFR 265.143(g)]				
F.	Liability Coverage				
F-1.	Sudden accidental occurrences [40 CFR 265.147(a)]	N			See comment I.F-1.
	o Liability insurance [40 CFR 265.147(a)(1)]				
	o Financial test or corporate guarantee [40 CFR 265.147(a)(2)]				

Facility Name: New Departure Hyatt Hazardous Waste Storage Facility
ID Number: OHD001880442

	Provided (Y/N or NA)	Adequate (Y/N)	References	Comments
o Letter of credit [40 CFR 265.147(a)(3)]				
o Surety bond [40 CFR 265.147(a)(4)]				
o Trust fund [40 CFR 265.147(a)(5)]				
o Combinations of insurance, financial test, guarantee, letter of credit, surety bond, and trust fund [40 CFR 265.147(a)(6)]				
F-2. Non-sudden accidental occurrences [40 CFR 265.147(b)]	NA			
o Liability insurance [40 CFR 265.147(b)(1)]				
o Financial test or corporate guarantee [40 CFR 265.147(b)(2)]				
o Letter of credit [40 CFR 265.147(b)(3)]				
o Surety bond [40 CFR 265.147(b)(4)]				

NA = Not Applicable

Facility Name: New Departure Hyatt Hazardous Waste Storage Facility
ID Number: OHD001880442

	Provided (Y/N or NA)	Adequate (Y/N)	References	Comments
o Trust fund [40 CFR 265.147(b)(5)]				
o Combinations of insurance, financial test, guarantee, letter of credit, surety bond, and trust fund [40 CFR 265.147(b)(6)]				

Facility Name: New Departure Hyatt Hazardous Waste Storage Facility
ID Number: OHD001880442

		Provided (Y/N or NA)	Adequate (Y/N)	Reference	Comments
II.	CLOSURE OF CONTAINER STORAGE AREA				
A.	Closure Performance Standards for the Container Storage Area	(Address this item under Section I.A)			
B.	Contents of Closure Plan				
B-1.	Detailed description of how the container storage area will be closed [40 CFR 265.112 (b)(1)]	Y	N	1(pp.1-3)	See comment II.B-1.
B-2.	Identification of maximum extent of operation of container storage area [40 CFR 265.112 (b)(2)]	Y	N	1(p.1)& Drawing	See comment I.B-2.
B-3.	Estimate of maximum inventory of hazardous waste ever in the container storage area [40 CFR 265.112 (b)(3)]	Y	N	1(p.3)	See comment I.B-3.

Facility Name: New Departure Hyatt Hazardous Waste Storage Facility
ID Number: OHD001880442

		Provided (Y/N or NA)	Adequate (Y/N)	Reference	Comments
B-4.	Detailed description of removal of hazardous waste inventory [40 CFR 265.112 (b)(3) and 265.114]	Y	N	1(pp.2-3)	See comment II.B-4.
B-5.	Identification of and type of off-site hazardous waste management units(s) [40 CFR 265.112 (b)(3)]	Y	N	1(p.3)	See comment I.B-5.
B-6.	Criteria for determining the extent of decontamination necessary [40 CFR 265.112 (b)(4) and 265.114]	Y	N	1(p.3)	See comment II.B-6.
B-7.	Detailed description of decontamination steps [40 CFR 265.112 (b)(4) and 265.114]	Y	N	1(p.3)	See comment II.B-7.
B-8.	Procedures for cleaning equipment and structures and removing contaminated soils [40 CFR 265.112 (b)(4) and 265.114]	Y	N	1(p.3)	See comment II.B-8.

Facility Name: New Departure Hyatt Hazardous Waste Storage Facility
ID Number: OHD001880442

	Provided (Y/N or NA)	Adequate (Y/N)	Reference	Comments
B-9. Detailed description of removal of hazardous waste residues [40 CFR 265.112 (b)(4) and 265.114]	Y	N	1(p.2)	See comment II.B-9.
B-10. Methods for sampling and testing to demonstrate success of decontamination [40 CFR 265.112 (b)(4) and 265.114]	Y	N	1(p.2)	See comment II.B-10.
B-11. Detailed description of other necessary activities [40 CFR 265.112 (b)(5)]	N			See comment I.B-7.
B-12. Detailed schedule for closure of container storage area [40 CFR 265.112 (b)(6)]	(Address this item under Section I.B-8)			
C. Closure Cost Estimate, Financial Assurance, and Liability Coverage [40 CFR 265.142, 265.143, and 265.147]	(Address these items under Sections I.D, I.E, and I.F)			

State of Ohio Environmental Protection Agency

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

DON

Toward A Cleaner Environment
15 Year Anniversary 1972 - 1987

Richard F. Celeste
Governor

January 9, 1989

Re: GMC/New Departure Hyatt
U.S. EPA ID No.: OHD001880442
Ohio Permit No.: 03-22-0464
Closure Plan

GMC/New Departure Hyatt
Attn: Robert W. Hare
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Sir:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for GMC/New Departure Hyatt located at 2509 Hayes Avenue, Sandusky, Ohio appeared the week of January 2, 1989, in the Sandusky Register, Sandusky, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, February 8, 1989.

Copies of the closure plan will be available for public review at the Library Association of Sandusky, 114 W. Adams Street, Sandusky, Ohio 44870 and the Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402.

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

Very truly yours,

Thomas E. Crepeau

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

TEC/dhs

cc: Lisa Pierard, U.S. EPA, Region V
Randy Meyer, Ohio EPA, DSHWM, TA&ES
Chuck Hull, Ohio EPA, DSHWM, NWDO

2267R(82)

PUBLIC NOTICE Erie County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: GMC/New Departure Hyatt, 2509 Hayes Avenue, Sandusky, Ohio 44870, U.S. EPA ID No.: OHD001880442, Ohio Permit No.: 03-22-0464. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for drum storage for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Library Association of Sandusky, 114 W. Adams Street, Sandusky, Ohio 44870 and the Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402. Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.

New Departure Hyatt

RECEIVED
NOV 3 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

November 2, 1988

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

Dear Mr. Hamper:

On October 18, 1988, this facility submitted a Closure Plan for storage facilities at this site. Enclosed is the detailed drawings for the storage facility referenced in that Closure Plan. They were inadvertently left out of the submittal.

I apologize for any inconvenience this may have caused. If you have any questions, please contact the writer at (419) 627-7076.

Sincerely,

Robert W. Hare
Environmental Engineer

dor
Encl

RWH 11/2/88

New Departure Hyatt

RECEIVED
NOV 0 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

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Robert W. Hare
Environmental Engineer

dor
Encl

RWH 11/2/88

AUG 05 1988

5H-12

Robert W. Hare,
Environmental Engineer
General Motors Corporation
New Departure Hyatt
2509 Hayes Avenue
Sandusky, Ohio 44870

RE: Drum Storage Pad Closure Plan
General Motors Corporation
New Departure Hyatt
OHD 001 880 442

Dear Mr. Hare:

The United States Environmental Protection Agency (U.S. EPA) received a copy of the above-mentioned facility's partial closure plan in December 1987. This plan was also submitted to the Ohio Environmental Protection Agency (OEPA). The plan concerned closure of the facility's original drum storage pad. The Agency understands that implementation of this plan is necessary as preparation for submittal of a final closure plan, so the facility may begin the process of attaining generator only status, rather than submit a Part B Permit Application.

The OEPA approved the plan conditionally in a letter dated January 26, 1988. The U.S. EPA concurs with the OEPA's review and approval. The U.S. EPA approves the partial closure plan submitted by General Motors Corporation New Departure Hyatt, with the conditions stipulated by the OEPA in the January 26, 1988, letter and with the conditions enclosed with this letter.

If you have any questions, please contact Don Heller at (312) 353-1248.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosures

cc: Becky Strom, RPB
Thomas Crepeau, OEPA/CO
Ed Kitchen, OEPA/CO
Randy Meyer, OEPA/CO
Rod Miller, OEPA/NWDO

5HS-13:jufor F.Dean:DH:7/29/88

5H-12

Robert W. Hare,
Environmental Engineer
General Motors Corporation
New Departure Hyatt
2509 Hayes Avenue
Sandusky, Ohio 44870

RE: Drum Storage Pad Closure Plan
General Motors Corporation
New Departure Hyatt
OHD 001 880 442

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Sincerely,

Basil G. Constantelos, Director
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Enclosures

cc: Becky Strom, RPB
Thomas Crepeau, OEPA/CO
Ed Kitchen, OEPA/CO
Randy Meyer, OEPA/CO
Rod Miller, OEPA/NWDO

5HS-13 for F.Dean:DH:7/29/88

RCRA PERMITS			DH	RPB CHIEF	O.R. A.D.D.	WMD DIR
INIT. DA	3D 7/29	DAH 8-1-88	8/2/88	8/3/88	WEY 8/4	WEY Acting 8/4/88

CONDITIONS FOR APPROVAL OF THE DRUM STORAGE PAD CLOSURE PLAN

GENERAL MOTORS CORPORATION - NEW DEPARTURE HYATT

OHD 001 880 442

1. PART II, FACILITY DESCRIPTION: List exactly what wastes are stored on the pad.

2. PART III, PROCEDURES FOR DECONTAMNATION AND/OR DISPOSAL:

   a. After removal of the drums, the concrete pad is to be inspected for cracks, spalling, and any other signs of structural failure. Where cracks appear, borings are to be made along them, beginning at the points closest to the center of the pad and repeated along the lengths of the individual cracks at an interval no greater than four (4) feet. If patches are detected where the entire thickness of the concrete is disaggregated by dissolution, crushing, or other means, at least one boring is to be made in these areas. Additional borings are to be obtained if the above-mentioned areas extend any more than six (6) square feet. Below the borings, the soil is to be sampled and tested, as the closure plan states, for the sampling of the soil surrounding the pad.

   It must be noted that current regulations prohibit the land disposal of certain listed hazardous wastes, including the spent solvents F001 through F005. Nonetheless, until November 8, 1988, listed solvent-contaminated soils may be land disposed if concentrations of these wastes are less than 1 percent (by weight). Please refer to Page 40575 of the enclosed copy of the November 7, 1986, Federal Register for explanation of this matter.

   Otherwise, land disposal is only allowable if concentrations of these listed wastes are at or below the treatment standards, for soils and waste waters listed in 40 CFR Part 268, Appendix II. If concentrations of the F005 wastes, in the excavated soil surrounding and/or below the pad, exceed the limits in Appendix II, treatment of the soil (e.g., incineration) will be required prior to its disposal in a landfill. Please refer to the November 7, 1986, Federal Register for additional guidance on this matter.

   In either case, the land disposal facility which will receive the hazardous waste is to be provided with a complete shipping manifest that fully describes the volumes of waste and the concentrations of all contaminants they contain. We recommend that your facility contact the selected land disposal facility before shipment, to discuss the nature of the waste materials and any applicable regulations. Please refer to 40 CFR Part 262, Subpart B, for additional guidance.

b. Washing of the pad surface has the potntial of generating hazardous waste in the form of contaminated waste water, which means that this waste water is to be disposed of in an environmentally sound manner. Pouring the waste water into a city sanitary sewer, which leads to a publicly owned treatment works, can be an acceptable means of disposal, provided you first receive the permission of the city administrators responsible for the system. Disposal into storm drains, which lead to ditches or streams, is not an acceptable method.

   If permission cannot be obtained for disposal of all waste waters into a sanitary sewer, the volumes of water whose contaminant levels exceed the treatment standards, listed in 40 CFR Part 268, Appendix II, must be handled as hazardous waste. This waste is to be shipped, in compliance with the regulations in Part 262, Subparts B and C, to a permitted hazardous waste treatment facility.

c. The independent registered professional engineer, who will certify closure of the pad area, is to be one who is experienced in geotechnical matters.

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

Toward A Cleaner Environment
15 Year Anniversary 1972 - 1987

Richard F. Celeste
Governor

August 27, 1987

Re: GMC/New Departure Hyatt
US EPA ID No.: OHD001880442
Ohio Permit No.: 03-22-0464
Partial Closure Plan

GMC/New Departure Hyatt
Attn: Robert W. Hare
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Sir:

A public notice acknowledging the Ohio EPA's receipt of a partial closure plan for GMC/New Departure Hyatt in Sandusky, Ohio will appear the week of August 24, 1987, in the Sandusky Register, Sandusky, Ohio. The Director of the Ohio EPA will act upon the partial closure plan request following the close of the public comment period, September 30, 1987.

Copies of the partial closure plan will be available for public review at the Library Association of Sandusky, Columbus Avenue & W. Adams Street, Sandusky, Ohio 44870 and the Ohio EPA, Northwest District Office, 1035 Devlac Grove Avenue, Bowling Green, Ohio 43402.

Please contact me at (614) 481-7217, if you have any questions concerning this matter.

Sincerely,

Thomas E. Crepeau

Thomas E. Crepeau
Program Planning and Management Section
Division of Solid & Hazardous Waste Management

TEC/dhs

cc: Rebecca Strom, U.S. EPA, Region V
Dan Fisher, OEPA, DSHWM, TA&ES
Rich Dreschel, OEPA, DSHWM, NWDO

RECEIVED
AUG 31 1987
U.S. EPA, REGION V

1013R

PUBLIC NOTICE Erie County

RECEIPT OF HAZARDOUS WASTE PARTIAL CLOSURE PLAN

For: GMC/New Departure Hyatt, US EPA ID No.: OHD001880442, Ohio Permit No.: 03-22-0464, 2509 Hayes Avenue, Sandusky, Ohio 44870. The Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Partial Closure Plan involving a storage area for the above referenced facility.

Copies of the facility's Partial Closure Plan will be available for public review at the Library Assn. of Sandusky, Columbus Avenue & W. Adams Street, Sandusky, Ohio 44870 and the Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402.

Comments concerning the partial Closure Plan should be submitted before September 30, 1987 to: Thomas E. Crepeau, Div. of Solid & Hazardous Waste Mgmt., Program Planning and Management Section, P.O. Box 1049, 1800 WaterMark Drive, Columbus, Ohio 43266-0149.

NF
C

OhioEPA
State of Ohio Environmental Protection Agency

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

RECEIVED JUN 3 0
WMD RCRA
RECORD CENTER Part A

George V. Voinovich
Governor

RE: CLOSURE PLAN EXTENSION
Delco Moraine NDH Division
Hazardous Waste Storage Facility
OHD 001 880 442

CERTIFIED MAIL

RECEIVED
MAR 1 1993
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

OHIO E.P.A.
FEB 25 93
ENTERED DIRECTOR'S JOURNAL

February 25, 1993

Mr. Robert Hare
Senior Environmental Engineer
Delco Moraine NDH Division
General Motors Corporation
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Hare:

On January 25, 1993, Delco Moraine NDH Division located at 2509 Hayes Avenue, Sandusky, Ohio, submitted a request for an extension to the closure period specified in the approved closure plan dated June 23, 1992, for 90 days, until March 22, 1993. The extension request was submitted pursuant to OAC Rule 3745-66-13 (B) as closure will require longer than the 180-day period specified in OAC Rule 3745-66-13. Delco Moraine NDH Division has requested this extension due to their inability to achieve "rinse clean" standards. Delco Moraine NDH Division will conduct additional cleaning during the extension period.

My staff reviewed your request and recommends that the extension be granted per rule 3745-66-13 (B) of the Ohio Administrative Code. I concur and am therefore granting this extension request. This extension is being granted for the above referenced closure plan and expires on March 22, 1993.

Delco Moraine NDH Division shall continue to take all steps to prevent a threat to human health and the environment from the unclosed, but inactive waste management unit per OAC Rule 3745-66-13 (B)(2).

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

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

By: Niki Mackey Date 2/25/93

Printed on recycled paper

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications shall follow the format specified in OAC 3745-50-42 (D), and should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43226-1049.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days from the receipt of this letter. A copy of the appeal must be served to the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal must be filed at the following address:

Environmental Board of Review
236 East Town Street
Room 300
Columbus, Ohio 43215

Sincerely,

Gerry Loan

Donald R. Schregardus
Director

PAW/mtt

pc: Tom Crepeau, DHWM Central File, Ohio EPA
Section Chief, Ohio Permit Section, U.S. EPA - Region V
Randy Meyer, DHWM, Ohio EPA
Philip A. Williams, DHWM, NWDO

OHIO E.P.A.

FEB 25 93

ENTERED DIRECTOR'S JOURNAL

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

By: Niki Mackey Date 2/25/93

OhioEPA
State of Ohio Environmental Protection Agency

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

George V. Voinovich
Governor

DON

April 11, 1991

Re: GMC Delco Moraine, NDH Div.
Old Hazardous Waste Storage Area
Partial Closure
USEPA ID No.: OHD001880442
Ohio Permit No.: 03-22-0464

GMC Delco Moraine
New Departure Hyatt Div.
Attn: David D. Munson
2509 Hayes Ave.
Sandusky, Ohio 44870

Dear Mr. Munson:

According to our records, on January 26, 1988, the Director of Ohio EPA approved a partial closure plan submitted by GMC Delco Moraine, NDH Div. for an old hazardous waste storage area located at 2509 Hayes Ave., Sandusky, Ohio. On December 26, 1989, GMC submitted to the Director an independent registered professional engineer's certification and on March 4, 1991 the owner/operator's certification for completion of closure for the old hazardous waste storage area. Ohio EPA District Office personnel completed a closure certification inspection on February 20, 1991 and reviewed all documents pertaining to the old hazardous waste storage area. Based on the inspection and review, Ohio EPA has determined that GMC has closed the old hazardous waste storage area in accordance with the approved closure plan and Rules 3745-66-12 through 3745-66-15 of the Ohio Administrative Code (OAC) and will maintain the status of a treatment, storage and disposal facility.

If you have any questions concerning your current status, please contact Ohio EPA, Northwest District Office, Attn: Philip Williams, 1035 Devlac Grove Rd., Bowling Green, Ohio 43402, tel.: (419) 352-8461.

In accordance with Rules 3745-66-43(H) and 3745-66-47(E) of the OAC, GMC is not required to maintain financial assurance for closure costs and liability coverage for the old hazardous waste storage area at this facility. However, until full closure is completed in accordance with an approved closure plan, GMC will need to maintain financial assurance for closure costs and liability coverage for sudden accidental occurances for the facility.

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Please be advised that this letter does not relieve you of any corrective action responsibilities that may be required.

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

Very truly yours,

Thomas E. Crepeau

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

TC/rs

cc: Kevin Pierard, USEPA Region V
Lisa Pierard, USEPA Region V
Hazardous Waste Facility Board
Randy Meyer, RCRA TAS, DSHWM
Laurie Stevenson, HW ES, DSHWM
Philip Williams, DSHWM, NWDO
File

OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020 Fax (614) 644-2329

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JUN 11 1990
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

DON

Richard F. Celeste
Governor

CERTIFIED MAIL

CLOSURE PLAN APPROVAL

June 7, 1990

Re: Closure Plan
Delco Moraine NDH
OHD 001 880 442

Robert W. Hare
Environmental Engineer
Delco Moraine NDH
2509 Hayes Avenue
Sandusky, Ohio 44870

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

By: Mary Cavin Date 6-7-90

Dear Mr. Hare:

On November 3, 1988, Delco Moraine NDH submitted to Ohio EPA a closure plan for a hazardous waste container storage area located at 2509 Hayes Avenue, Sandusky, Ohio. Revisions to the closure plan were received on January 23, 1990, in response to my September 28, 1989, closure plan disapproval letter. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Delco Moraine NDH's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

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

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

The closure plan submitted to Ohio EPA by Delco Moraine NDH is hereby approved with the following modifications:

1. Within ten (10) days of receipt of this letter, submit a statement that Land Disposal Restriction rules promulgated in May of 1990 will be precisely followed, and all notices will be provided to document this.

Notify the Ohio EPA, Northwest District Office immediately, once the treatment, storage or disposal facility is selected for handling the remaining drummed inventory.

Notify the Ohio EPA, Northwest District Office immediately of the specific location of the temporary hazardous waste drum accumulation area.

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JUN -7 90
OHIO E.P.A.

4. Notify the Ohio EPA, Northwest District Office of the contractor that will provide decontamination services, within thirty (30) days of receipt of this letter.

5. Provide a copy of the contractor's health and safety plan within 30 days of receipt of this letter.

6. Provide a description of the decontamination procedures necessary within thirty (30) days of receipt of this letter, including but not limited to:

   a. type of equipment needing decontamination;

   b. procedure for cleaning equipment;

   c. area provided for decontamination activities; and

   d. management and volume of decontamination rinseate.

7. Within thirty (30) days of receipt of this letter, provide further details on the use of polyethylene sheeting. For example, include the height of the sheeting, the method for anchoring vertical support structures, and any other construction details.

8. Revise the rinseate sampling plan, within thirty (30) days of approval, to include the following:

   a. all applicable rinseate clean standards to be applied (See Modification No. 9 below);

   b. sampling methods and equipment;

   c. number and frequency of samples;

   d. chain of custody procedures; and

   e. evidence of QA/QC plan for the laboratory analysis.

9. Rinseate samples shall be analyzed for all hazardous constituents stored in the container storage area. Be sure to include analysis for xylene in Table 3. The hazardous waste container storage area shall not be considered "clean" until the final rinseate does not exceed the following criteria:

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

By: Mary Cavin Date 6-7-90

OHIO E.P.A.

JUN -7 90

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(1) Public drinking water maximum contaminant level (MCL) for hazardous waste constituents as promulgated in 40 CFR 141.11 and OAC 3745-81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics;

(2) If an MCL is not available, then the maximum contaminant level goal (MCLG) as promulgated in 40 CFR 141.50 shall be used; or

(3) If neither an MCL nor an MCLG is available, 1 mg/l shall be used.

If the MCL or MCLG is less than the contaminant's analytical detection limit using methods found in USEPA Publication SW-846, the SW-846 analytical detection limit shall be used as the clean standard.

10. Notify the Ohio EPA, Northwest District Office immediately, once the laboratory is selected for analysis of the rinseate.

11. Delco Moraine NDH may discharge contaminated rinseate to its wastewater treatment plant as long as such activity is consistent with the Clean Water Act and any local ordinances. Keep in mind, rinseate contaminated with listed hazardous waste above the rinseate clean standards will cause any solid wastes generated in the wastewater treatment process to be classified as listed hazardous waste by the mixture rule.

12. Closure shall commence upon receipt of this approval letter, not 60 days after approval of the closure plan is received from OEPA. Delco Moraine NDH shall submit a revised Figure 4 showing OEPA Plan Approval as Day 0 to Ohio EPA, Northwest District Office and Central Office within ten (10) days of receipt of this letter.

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

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

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

By: Mary Carr Date 6-7-90

OHIO E.P.A.
JUN -7 90
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Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

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

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,

Richard L. Shank

Richard L. Shank, Ph.D.
Director

OHIO E.P.A.
JUN -7 90
ENTERED DIRECTOR'S JOURNAL

RLS/RM/pas

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

2099U

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

By: Mary Cavin Date 6-7-90

DON

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

Richard F. Celeste
Governor

CLOSURE PLAN EXTENSION APPROVAL

CERTIFIED MAIL

JUL 06 1989

Re: Closure Plan Extension Request
GMC-New Departure Hyalt
OHD 001 880 442

Robert W. Hare
Environmental Engineer
GMC-New Departure Hyatt
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Hare:

On March 2, 1989, GMC-New Departure Hyatt submitted a request for an extension to the closure period specified in the approved closure plan for 120 days (July 13, 1989). The extension request was submitted pursuant to OAC Rule 3745-66-13(B) as closure will require longer than the 180 days period specified in OAC Rule 3745-66-13. GMC-New Departure Hyatt has requested this extension in order to collect additional background samples.

Therefore, closure of the hazardous waste drum storage area will require greater than 180 days because of the need to collect additional background samples. GMC-New Departure Hyatt will continue to take all steps to prevent a threat to human health and the environment from the closed but inactive waste management unit per OAC Rule 3745-66-13(B)(2).

The public was given the opportunity to submit written comments regarding the request for an extension to the closure period for GMC-New Departure Hyatt in accordance with OAC Rule 3745-66-13. The public notice appeared in the week of March 13, 1989, in the Sandusky Register. No comments were received in this matter.

An extension of time allowed for closure is hereby granted.

Because the Ohio EPA is not currently authorized to conduct the federal hazardous waste program in Ohio, your closure time extension request also must be reviewed and approved by the USEPA. Federal RCRA closure regulations (40 CFR 265.112) require that you submit a request for extension to Lisa Pierard,

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JUL 06 1989

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

By Carolyn Nicodemus Date 7/6/89

Chief, Waste Management Division, Technical Programs Section, Ohio Unit, USEPA, Region V, 5HS-13, 230 South Dearborn Street, Chicago, Illinois 60604. If the closure period specified in the approved closure plan has passed, approval by both agencies is necessary prior to continuation of activities required by the approved closure plan.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. The owner or operator certification shall follow the format specified in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Tom Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266-1049.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 250 East Town Street, Room 101, Columbus, Ohio 43266-0557.

Sincerely,

Richard L. Shank, Ph.D.
Director

RLS/RM/pas

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

1793U

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JUL 06 1989

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

By: Carolyn Mcadams Date 7/6/89

New Departure Hyatt

P 426 015 677

February 28, 1989

RECEIVED
MAR 03 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Thomas Crepeau, Manager
Division of Solid & Hazardous Waste Management
Ohio EPA
1800 Watermark Drive
Columbus, Ohio 43266-0149

RE: Closure Plan for OHD001880442 (Storage Pad Closure)

Dear Mr. Crepeau:

In the process of completing soil samples for the above-referenced closure plan, test results for chromium levels in background soils indicated chromium levels lower than soils surrounding the subject storage area. As these results were not expected, an investigation has revealed that the background soil samples taken were not of the same soil type as soil samples around the storage pad. The background soil was loose, loamy top soil, and the storage pad area samples were clay like.

The Ohio EPA Draft Closure Plan Review Guidance Document (February 8, 1988) states, "It is important that background soil be of the same type of soil horizon material as the comparison sample" (Page 11). It is, therefore, our feeling that additional background samples from an alternate location should be taken and analyzed to eliminate the possibility of any variance due to a difference in soil type.

In order to complete this additional sampling, an extension of 120 days is requested to obtain more representative soil samples and complete any clean-up if contamination is ultimately required.

If you have any questions regarding this matter, please contact the writer at 419/627-7076.

Sincerely,

Robert W. Hare

Robert W. Hare
Environmental Engineer

lfs

cc: Don Heller, U.S. EPA, Region V
Rich Dreschel, Ohio EPA, Northwest District Office

RWH 2/23/89

Kearney/Centaur Division
A.T. Kearney, Inc.
P.O. Box 1438
225 Reinekers Lane
Alexandria, Virginia 22313
703 683 7932

Management Consultants

DON

AT KEARNEY

January 13, 1989

Ms. Pat Vogtman
Regional Project Officer
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Reference: EPA Contract No. 68-01-7374; Work Assignment No. R25-03-23; GMC New Departure Hyatt; Sandusky, Ohio; EPA I.D. No. OHD001880442; Completeness/Technical Review of the Hazardous Waste Storage Facility Closure Plan; Final Deliverable

Dear Ms. Vogtman:

Enclosed is the Completeness/Technical Review of the Hazardous Waste Storage Facility submitted by the New Departure Hyatt Division of the General Motors Corporation. The project deliverables include the following:

- General deficiency comments;
- Specific Notice of Deficiency (NOD) comments; and
- The completed checklist from U.S. EPA's Protocol for Evaluating Interim Status Closure/Post-Closure Plans.

The following document was used for this review:

- Closure Plan for Hazardous Waste Storage Facility, October 18, 1988.

BACKGROUND

New Departure Hyatt is a manufacturer of automotive and non-automotive bearings. The operations at the facility include machining, grinding, washing, plating, heat treating, and assembly. New Departure Hyatt operates an indoor storage facility for storing hazardous wastes. The storage facility is constructed with a concrete foundation, block walls, and a wood-frame roof with asphalt shingles. New Departure Hyatt is proposing to close the storage facility in compliance with 40 CFR Part 265 and convert the status of the facility to a less than 90-day accumulation area.

GENERAL COMMENTS

New Departure Hyatt has not identified the hazardous wastes stored at the facility. RCRA hazardous wastes must be identified in order to determine if the facility has been successfully decontaminated. Consequently, New Departure Hyatt has been instructed in the review comments to provide a detailed list of hazardous wastes by chemical name and EPA hazardous waste number, and to include the results from waste analysis sampling in the closure plan. In addition, New Departure Hyatt has been instructed to determine if any of the hazardous waste inventory is a restricted waste and, if so, to specify in the closure plan how they will comply with the land disposal restriction final rules.

New Departure Hyatt needs to provide more detailed information on the less than 90-day accumulation area. They have been instructed to state how and where hazardous wastes will be managed until the storage facility can become a less than 90-day accumulation area and the expected date for the implementation of the first 90-day accumulation period.

CLOSURE PLAN DEFICIENCIES

The closure plan for the hazardous waste storage facility is substantially deficient in several areas. These deficiencies are discussed in detail in the attached specific comments. The major deficiencies and omissions of the plan are as follows:

- Decontamination and Removal of Hazardous Waste Residues: (see deficiency comments I.B-6 and II.B-6 through II.B-10)

  New Departure Hyatt has not demonstrated that all equipment and structures will be successfully decontaminated of hazardous wastes or constituents. The deficiency comments require New Departure Hyatt to specify the criteria used to judge the extent of decontamination to be in compliance with Ohio EPA (October 18, 1988) rinseate clean standards for RCRA closures. (Per direction from Ed Kitchen, Ohio EPA, these State standards were used as the basis for assessing compliance with the rinseate standards.) Also, the deficiency comments require New Departure Hyatt to submit a decontamination plan which establishes decontamination procedures for personnel and equipment, and a health and safety plan which provides guidelines and procedures to ensure the health and safety of decontamination personnel. In addition, the deficiency comments require New Departure Hyatt to submit a sampling and testing plan to demonstrate the success of decontamination.

- Schedule for Closure of Each Unit and Final Closure: (see deficiency comment I.B-8)

  The closure schedule does not contain sufficient detail to allow tracking of the progress of closure. The deficiency comments require New Departure Hyatt to revise the closure schedule to include the additional closure activities specified in the deficiency comments.

- Closure Cost Estimate: (see deficiency comment I.D-1)

  The closure cost estimate must be revised to provide more detail, based on the costs of having a third party close the facility, and address the deficiencies cited in the completeness/technical review.

- Financial Assurance for Closure: (see deficiency comment I.E)

  New Departure Hyatt has not provided any financial assurance documents. The deficiency comments require them to submit financial assurance documents.

- Liability Coverage: (see deficiency comment I.F-1)

  New Departure Hyatt has not provided liability coverage documentation for sudden accidental occurrences. The deficiency comments require New Departure Hyatt to submit liability coverage documentation.

If you should have any questions, please call me or the Work Assignment Manager, William Murphy Rohrer, who can be reached at (612) 227-6500.

Sincerely,

Arthur Glazer
Technical Director

Enclosure

cc: D. Heller, EPA Region V
E. Kitchen, Ohio EPA
J. Levin
D. Bean
A. Anderson
W. Rohrer, DPRA
T. Bingman, B/TSA

Ott.

New Departure Hyatt

July 6, 1988

Mr. Donald Heller
U.S. EPA, Region V
230 South Dearborn
MC 5HS-13
Chicago, Illinois 60604

RECEIVED
JUL 11 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA REGION V

Dear Mr. Heller:

Per our recent telephone conversation of July 5, 1988, enclosed is a copy of the Closure Plan for our original storage facility and the Ohio EPA approval of the Plan. Completion of this Closure will allow New Departure Hyatt to take the next step toward achieving "Generator Only" status for hazardous wastes. Your prompt attention to this matter is appreciated.

If you have any questions regarding this matter, please contact the writer at (419) 627-7076.

Sincerely,

Robert W. Hare

Robert W. Hare
Environmental Engineer

dor
Enclosure

RECEIVED
JUL 11 1988
U. S. EPA, REGION V
SWB — FMS

Let's Get It Together
SAFETY BELTS SAVE LIVES

DIVISION OF GENERAL MOTORS
2509 HAYES AVENUE • SANDUSKY, OHIO 44870 • PHONE (419) 627-7000

RWH 7/6/88

OhioEPA

State of Ohio Environmental Protection Agency

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

Toward A Cleaner Environment
15 Year Anniversary 1972 - 1987

Richard F. Celeste
Governor

Rec'd 1-27-88

CERTIFIED MAIL

January 26, 1988

Re: CLOSURE PLAN
NEW DEPARTURE HYATT
OHD001880442

Mr. Robert W. Hare
Environmental Engineer
New Departure Hyatt
Division of General Motors
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Hare:

On April 17, 1986, New Departure Hyatt submitted to Ohio EPA a closure plan for a hazardous waste container storage area located at 2509 Hayes Avenue, Sandusky, Ohio. Revisions to the closure plan were received on May 6, 1986, and December 3, 1987. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that New Departure Hyatt's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

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

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

The closure plan submitted to Ohio EPA by New Departure Hyatt is hereby approved with the following modifications:

1. A site map indicating the location of soil samples shall be provided to Ohio EPA, Northwest District Office (NWDO) and Central Office (CO) for their review and approval at least ten (10) business days prior to any sampling event.

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

By: Mary Cavin Date 1-26-88

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JAN 26 1988

2. Section III of the closure plan states that the soil above each sampling depth will be considered contaminated if the analysis indicates the presence of any RCRA-regulated waste solvent at greater than the compound's analytical practical quantification limit as detailed in USEPA Publication SW-246. USEPA Publication SW-846 shall be used instead to define the analytical practical quantification limit for RCRA-regulated waste solvents.

3. The owner/operator's and independent registered engineer's certifications of closure must follow the signature requirements found in OAC 3745-50-42. The owner/operator's certification statement must include the wording as found in OAC 3745-50-42(D).

4. Ohio EPA's facility inspector shall be contacted at least five (5) business days in advance of certain critical activities, such as soil sampling or removal, so that the inspector may be present to observe these activities.

5. New Departure Hyatt has demonstrated that this closure plan has been submitted for review and approval by USEPA and that closure activities will, of necessity, take longer than 180 days to complete in order to allow for a period of time for review and approval by USEPA. Therefore, pursuant to OAC Rule 3745-66-13(B) a longer closure period is hereby approved provided New Departure Hyatt shall commence closure as soon as possible upon receipt of this approval by Ohio EPA or upon receipt of approval by USEPA, whichever occurs later. This closure period shall not exceed 180 days beyond the latter approval.

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

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

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after

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

By: Mary Cavin Date 1-26-88

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JAN 26 1988

notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,

Richard L. Shank, Ph.D.
Director

RLS/RM/ara

cc: Thomas Crepeau/DSHWM Central File, Ohio EPA
Rebecca Strom, USEPA, Region V 312/886-6194
Rod Miller, NWDO, Ohio EPA
Chuck Hull, NWDO, Ohio EPA
Randy Meyer, DSHWM, Ohio EPA

1370U

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

By: Mary Cavin Date 1-26-88

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JAN 26 1988

New Departure Hyatt

December 8, 1987

Mr. George Hamper
Chief, Waste Management Division
Technical Programs Section
Ohio Unit
U.S. EPA Region V, 5HS-13
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Hamper:

Per the instructions of the enclosed letter from Mr. Richard Shank, Director of the Ohio EPA, dated November 3, 1987 Herein is a copy of the Closure Plan submitted for your consideration.

If you have any questions regarding this information on the Plan, please contact the writer at (419) 627-7076.

Sincerely,

Robert W. Hare
Environmental Engineer

dor
Enclosure

NEW DEPARTURE HYATT
DIVISION OF GENERAL MOTORS

OHD 001880442

June 3, 1986

V. J. Kim, Acting Chief
Technical Programs Section
U. S. E.P.A. Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED
JUN 09 1986
SOLID WASTE BRANCH
U.S. EPA, REGION V

RE: 5HS-JCK-13

Dear Mr. Kim:

Per your request of May 28, 1986, enclosed is the information necessary to evaluate the Closure Plan previuosly submitted. If you have any questions regarding this matter, please call the writer at (419) 627-7076.

Sincerely,

Robert W. Hare
Environmental Engineer

RECEIVED
JUN 10 1986
SWD - AIS
U.S. EPA, REGION V

cc: Tom Crepeau, Ohio E.P.A.
Ben Chamber, Ohio E.P.A. - Northwest District Office
Tom Carlisle, Ohio E.P.A.
Jim Brossman, HWEB

1. New Departure Hyatt is a manufacturer of automotive and non-automotive bearings which operates various metal machining and finishing operations.

2. The material stored will be loaded on to the disposal company's truck using fork lifts equipped with special drum handling grips. The drums will be thoroughly inspected and checked for excessive rust, loose bungs. If any drums pose a hazard of spillage, the appropriate security personnel will be contacted and the material will be transferred to a new drum.

3. The drum storage pad will be visually inspected for stains resulting from spillage of waste material. Any stains will be cleaned thoroughly with "Detrex 44" industrial detergent and triple rinsed afterwards, until the stains are removed. Excess fluids during cleanup, if any, will be vacu umed using existing vacuum tanks and disposed of at the existing Industrial Wastewater Treatment Plant. If any stains exist near cracks in the pad, that section of the pad will be removed and the soil analyzed for any possible contamination. If contamination exists soil will be removed until the contamination has been eliminated.

4. Costs of closure of this site are estimated as follows...

Disposal Costs	$ 50 per drum
Labor Costs	$ 30 per hour
Decontamination Costs	$ 75 per hour
Testing Costs	$100 per sample
Soil Removal	$ 35 per cubic yard

NOTE: These costs are estimates of the funds that would be necessary in the event any materials are stored at the site and there is evidence of site contamination.

RWH 6/3/86

New Departure Hyatt

RECEIVED
DEC 0 - 1987
U.S. EPA, REGION V

November 30, 1987

RECEIVED
DEC 10 1987
U. S. EPA, REGION V
SWB — PMS

Mr. Thomas Crepeau
Program Planning and Management Section
Ohio EPA
Post Office Box 1049
Columbus, Ohio 43266-0149

RE: Modified Closure Plan, OHD001880442

Dear Mr. Crepeau:

As provided in Mr. Richard Shank's letter dated November 3, 1987, attached is the revised Closure Plan for your reconsideration. This Plan was rewritten following the guidelines provided by Mr. Shank. If there is additional information required for the Closure Plan, it would be appreciated if you contact the writer at (419) 627-7076 prior to the Plan being issued for Public Notice.

Thank you for your attention in this matter.

Sincerely,

Robert W. Hare
Environmental Engineer

dor
Attachment

RECEIVED
OHIO EPA
DEC 03 1987
DIV. of SOLID & HAZ. WASTE MGT

CLOSURE PLAN

FOR

HAZARDOUS WASTE STORAGE FACILITY

IN EXISTENCE PRIOR TO

NOVEMBER 19, 1980

AT

NEW DEPARTURE HYATT

DIVISION OF GENERAL MOTORS CORPORATION

2509 HAYES AVENUE

SANDUSKY, OHIO 44870

ROBERT W. HARE

NOVEMBER 25, 1987

RECEIVED
OHIO EPA

DEC 03 1987

DIV. of Solid & Hazardous Waste MGT.

30 Days	Remaining wastes in storage removed to Environmental Waste Control, Inc., Inkster, Michigan for disposal.*
60 Days	Soil samples will be taken and pad cleaned and wash solution analyzed.
90 Days	Begin any contaminated soil or concrete removal.
150 Days	Complete analyses necessary to certify area is "cleaned".
180 Days	Certify closure by an independent registered professional engineer[3] and remove all warning signages.

V. COST ESTIMATES FOR CLOSURE

Prepared by: Robert W. Hare
Robert W. Hare
Environmental Engineer

Disposal of Remaining Drums in Storage	$10,000**
Soil and Water Sample Analysis	$ 2,500
Decontamination Cost (if necessary)[2]	$ 5,000
Disposal Cost of Soil (if necessary)[2]	$ 3,000
Certification Cost	$ 1,000
Total	$21,500

* Vendor may vary depending on disposal contract in effect at that time.

** This is a maximum possible cost (40 drums maximum at $250/drum).

[2] These costs could vary depending upon degree of contamination, if any.

[3] Anticipated to be Burgess and Niple, Ltd., Columbus, Ohio.

RWH 11/25/87 CP

I. INTRODUCTION

New Departure Hyatt is a manufacturer of automotive and non-automotive bearings. The operations included in this facility include, machining, grinding, washing, plating, heat treating, and assembly. The manufacturing building is approximately 900,000 square feet of the total 1,300,000 square feet. The remaining area is office/administrative operations. The total site is approximately 133 acres enclosed by fence and is manned for security 24 hours a day, 365 days per year. The attached site sketch shows the location of the subject storage facility. Under the U.S. EPA Regulations, 40 CFR Part 265, Subpart G, Sections 265.110 through 265.120, each facility which stores, treats, or disposes of Hazardous Wastes must have a Closure Plan on file. This Closure Plan has been prepared for the following storage facility:

A. EPA Identification Number: OHD001880442

B. Owner's Name: General Motors Corporation
New Departure Hyatt Division
2509 Hayes Avenue
Sandusky, Ohio 44870

C. This Plan has been prepared by: Robert W. Hare
November 5, 1987
(419) 627-7076

II. FACILITY DESCRIPTION

The storage facility is approximately a 10 feet X 10 feet concrete pad in plan and is a contiguous part of a larger pad used to store alloy metals. There is no secondary containment or special provisions for handling rainwater on this area. A topographic map of this area of the facility is attached indicating elevations and structures in the area. A detailed scale drawing of the storage pad is also enclosed.

The material stored in the area is placed on pallets with fork trucks and loaded onto the transporter's truck using fork trucks. The drums are thoroughly inspected weekly and checked for excessive rusting or loose bungs. If any drums pose a danger of releasing material, the appropriate supervisory personnel are contacted to transfer the waste material into a new drum. Drums are shipped for disposal every three (3) to four (4) months to minimize the potential for waste release.

III. PROCEDURES FOR DECONTAMINATION AND/OR DISPOSAL

Prior to closure, the soil around the storage pad shall be sampled in at least four (4) locations and samples shall be analyzed for Total Chromium and RCRA regulated waste solvents listed as F005 in OAC 3745-51-31 (Toluene, methyl ethyl ketone, carbon disulfide, isobutanol and pryidine). In addition, four (4) background soil samples will be obtained and analyzed for Total Chromium.

All soil samples shall be taken using the procedures set forth in ASTM Standard D420-69 (soil-like material) and analyzed per the procedures detailed in U.S. EPA Publication SW-846, "Test Methods for Evaluating Solid Waste". Samples will be taken at a 6" depth initially and additional depth samples will be taken if the initial samples indicate the presence of any contamination. The soil above each depth will be considered contaminated if the analysis indicate the presence of any RCRA regulated waste solvent at greater than the compound's analytical practical quantification limit as detailed in U.S. EPA Publication SW-246.

The concrete surface of the storage pad will be cleaned using a mechanical scrubber with a cleaning solution of Detrex 44 and water. The detergent in the scrubber will be analyzed for EP Toxicity Metals and all RCRA waste solvents that were stored on the pad. This detergent and the storage area of the pad shall be considered contaminated if the detergent sample contains greater than 1 mg/l of any RCRA regulated solvents analyzed or greater than 5 mg/l Total Chromium.

All analytical and sampling methods shall be as follows:

Soil Sampling - ASTM Standard D420-69
Soil Analyzed - U.S. EPA Publication SW-846
Water Samples - U.S. EPA Methods for Chemical Analysis of Water and Waste (EPA-600)
Water Analyzed - U.S. EPA Methods for Chemical Analysis of Water and Waste (EPA-600)

The areas of potential contamination are located on the attached storage area map.

Any soil found to be contaminated will be removed using excavating equipment and placed into a 20 cubic yard roll-off container for transportation to the disposal site. The container will be lined as necessary to contain any free liquids that could be present due to wet conditions. Any contaminated soil will be disposed of at the secure landfill of Fondessey Enterprises, Oregon, Ohio pending the necessary approvals.

The soil surrounding the storage pad shall be determined to be "cleaned" based on the chromium level found in soil as compared to background samples plus two (2) standard deviations. Once this determination is made, closure will be certified by the Owner's designated representative and independent registered professional engineer.

IV. SCHEDULE OF CLOSING

Since the date the Closure Plan will be approved is not known at this time, the timetable listed below is based on the number of calendar days from date of approval (See Section 265.112 [c]).

OhioEPA

State of Ohio Environmental Protection Agency

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

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NOV 06 1987
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U.S. EPA, REGION V

Toward A Cleaner Environment
15 Year Anniversary 1972 - 1987

Richard F. Celeste
Governor

NOV 06 1987
U. S. EPA, REGION V
SWB — PMS

Issuance Date Nov. 3, 1987
Effective Date Dec. 3, 1987

CERTIFIED MAIL

November 3, 1987

Re: CLOSURE PLAN
NEW DEPARTURE HYATT
DIVISION OF GENERAL MOTORS
OHD001880442, 03-22-0464

Mr. Robert W. Hare
Environmental Engineer
New Departure Hyatt
Division of General Motors
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Hare:

On April 17, 1986, New Departure Hyatt, Division of General Motors, submitted to Ohio EPA a closure plan for the "original" hazardous waste container storage area located at 2509 Hayes Avenue, Sandusky, Ohio. Revisions to the closure plan were received on May 6, 1986. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that New Departure Hyatt's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of New Departure Hyatt in accordance with OAC Rule 3745-66-12. The public comment period extended from August 24, 1987, to September 30, 1987. No comments were received by Ohio EPA in this matter.

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

The closure plan submitted to Ohio EPA by New Departure Hyatt is hereby disapproved.

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

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

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

Sincerely,

Richard L. Shank, Ph.D.
Director

RLS/DF/ara

Attachment

cc: Thomas Crepeau/DSHWM Central File, Ohio EPA
Rebecca Strom, USEPA, Region V
Rod Miller, NWDO, Ohio EPA

1573U

ATTACHMENT

GMC NEW DEPARTURE HYATT

The following points must be addressed in the revised closure plan.

1. Facility Description

   - Provide the size of the storage area.

   - Provide a detailed description of the storage pad. Include the material of which the pad is constructed, a detailed description of any secondary containment structures along with details of any drains or means of handling rainwater.

   - Provide a detailed scale drawing of the storage pad.

   - Provide a topographic map of the area of the facility.

2. Procedures for Decontamination and/or Disposal

   - Provide a statement that the soil around the storage pad shall be sampled in at least four locations for total chromium and RCRA regulated waste solvents listed as F005 in OAC 3745-51-31.

   - Provide a statement that at least four background soil samples shall be collected and analyzed for total chromium.

   - Provide a statement that soil shall be considered contaminated if the soil samples indicate the presence of any RCRA regulated waste solvent at greater than the compound's analytical practical quantification limit (as found in USEPA Publication SW-846, "Test Methods for Evaluating Solid Wastes"). Contaminated soil shall be removed and managed as hazardous waste.

   - Provide a statement that soil samples shall be taken at the six (6) inch depth and analyzed individually. If contaminated soil is detected, soil samples at additional depth intervals shall be taken. (New Departure Hyatt may choose to take the samples at the additional depths at the same time as the six (6) inch interval.)

   - Indicate that rinseate samples from the pad shall be sampled for EP Toxicity metals and all RCRA regulated waste solvents stored in the area. Also indicate that rinseates and the pad shall be considered contaminated if the rinseates contain greater than 1 mg/l of any RCRA regulated solvents or greater than maximum concentrations of chromium under the characteristic of EP Toxicity in OAC 3745-51-24.

   - Provide a list or sketch of potentially contaminated areas (soil surrounding or beneath the storage area).

   - Provide analytical methods from USEPA publication SW-846 ("Test Methods for Evaluating Solid Wastes") to be used in analyzing rinseate and soil samples. Also provide detail of soil sampling methods to be used.

- Provide a description of any soil removal methods to be used if soil contamination is detected.

- Select from the Enclosure a means of determining the "clean" level for chromium for soils beneath and/or surrounding the storage area. All metal analyses for soils shall be for total metals.

- Describe where any contaminated soil disposal shall take place.

- Indicate that closure certification shall be provided by both the owner or operator and an independent registered professional engineer.

3. Closure Schedule

- The schedule must begin with the Director's approval of the closure plan and show completion of closure within 180 days.

- Include details of time required to: decontaminate the pad, collect rinseate and soil samples; and analyze rinseate and soil samples.

4. Closure Costs

- Indicate total closure costs.

1573U

ENCLOSURE

NATURALLY OCCURRING ELEMENTS OR COMPOUNDS

Alternative A - Soils containing naturally occurring elements in the area of the hazardous waste management unit shall be considered to be contaminated if concentrations in the soils exceed the mean of the background samples plus two standard deviations.

All metals analyses must be for total metals.

Alternative B - Soils containing RCRA-regulated metals shall be considered to be contaminated if concentrations in the soil exceed the upper limit of the range for Ohio farm soils, as given below:

Metal	Range (Total Metal Concentration in ug/g)
Cadmium	0 - 2.9
Chromium	4 - 23
Lead	9 - 39

(Source: Logan, T.J. and R.H. Miller, 1983. Background Levels of Heavy Metals in Ohio Farm Soils. Research Circular 275, Ohio State University, Ohio Agricultural Research and Development Center, Wooster.)

All metals analyses must be for total metals.

Ohio EPA may reject any of the above alternatives based on site-specific information. Also, the Agency may accept alternate statistical methods if the owner/operator can demonstrate that the statistical method proposed is environmentally acceptable and is technically superior.

1573U

OhioEPA
State of Ohio Environmental Protection Agency

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

George V. Voinovich
Governor

January 23, 1991

Re: General Motors Corporation
Financial Assurance

Robert T. O'Connell
Executive Vice President
General Motors Corporation
3044 West Grand Boulevard
Detroit, Michigan 48202

Dear Mr. O'Connell:

Ohio EPA is in receipt of the revised Financial Test documentation submitted in response to Ohio EPA's notice of violation dated June 26, 1990. Review of the documentation reveals that the General Motors Corporation's Ohio facilities are in compliance with Ohio Administrative Code rules 3745-66-42 through 3745-66-45 and 3745-66-47.

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

Sincerely,

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

cc: Laurie Stevenson, HWES, DSHWM
Paul Anderson, DSHWM, NEDO
Jeff Steers/Janet Leite, DSHWM, NWDO
Paul Pardi, DSHWM, SWDO
Chris Hartford, DSHWM, CDO
Frank Seibert, General Motors Corporation w/attachment
Armand Sokolowski, General Motors Corporation w/attachment

Printed on recycled paper

Ohio Facilities Covered under GMC 1990 Financial Test Documentation:

GMC BOC Lordstown Assembly	OHD020632998	02-78-0356
GMC Central Foundry Defiance	OHD005050273	03-20-0221
GMC Moraine Engine	OHD980569388	05-57-0115
GMC Delco Moraine Dayton North	OHD045557766	05-57-0273
GMC Delco Moraine Dayton South	OHD060928561	05-57-0274
GMC Delco Products Kettering	OHD004255410	05-57-0405
GMC Inland Fisher Guide Columbus	OHD004294419	01-25-0440
GMC Inland Fisher Guide Elyria	OHD004201091	02-47-0192
GMC Harrison Radiator Dayton	OHD017958604	05-57-0256
GMC Harrison Radiator Moraine	OHD000817577	05-57-0272
GMC Delco Products Dayton	OHD000817023	05-57-0317
GMC Inland Fisher Guide Euclid	OHD097622336	02-18-0260
GMC Delco Product Vandalia	OHD052151701	05-57-0316
GMC Delco Moraine NDH Sandusky	OHD001880442	03-22-0464
GMC Packard Electric	OHD018414292	02-78-0123
GMC Packard Electric	OHD000817346	02-78-0124
GMC Moraine Assembly Dayton	OHD041063074	05-57-0116

General Motors Corporation

RECEIVED

MAR 31 1986

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

RECEIVED
1 1986
U.S. EPA REGION 5
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

OHD-001-886-442

Mr. Valdas V. Adamkus
Regional Administrator
U.S. EPA Region V
230 S. Dearborn
Chicago, IL 60604

Dear Mr. Adamkus:

I am the chief financial officer of General Motors Corporation, 3044 West Grand Boulevard, Detroit, Michigan 48202. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Attachment A.

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Attachment A.

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Attachment B.

9275f-75

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This owner or operator is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1985.

ALTERNATIVE I
($ In Millions)

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 46.0
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 8.0
3.	Sum of lines 1 and 2	$ 54.0
*4.	Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	$ 34,308.1
*5.	Tangible net worth	$ 23,579.4
*6.	Net worth	$ 29,524.7
*7.	Current assets	$ 24,256.0
*8.	Current liabilities	$ 22,298.5
9.	Net working capital (line 7 minus line 8)	$ 1,957.5
*10.	The sum of net income plus depreciation, depletion, and amortization	$ 10,207.5
*11.	Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	$ 50,796.0

		YES	NO
12.	Is line 5 at least $10 million?	X	
13.	Is line 5 at least 6 times line 3?	X	
14.	Is line 9 at least 6 times line 3?	X	
*15.	Are at least 90% of assets located in the U.S.? If not complete line 16.		X
16.	Is line 11 at least 6 times line 3?	X	
17.	Is line 4 divided by line 6 less than 2.0?	X	
18.	Is line 10 divided by line 4 greater than 0.1?	X	
19.	Is line 7 divided by line 8 greater than 1.5?		X

I hereby certify the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

F. A. Smith
Executive Vice President
March 14, 1986

Deloitte
Haskins+Sells

1114 Avenue of the Americas
New York, New York 10036
(212) 790-0500
Telex 12267

General Motors Corporation:

We have examined the consolidated balance sheet of General Motors Corporation (the "Corporation") and consolidated subsidiaries as of December 31, 1985 and the related statements of consolidated income and changes in consolidated financial position for the year then ended, and have issued our opinion thereon dated February 3, 1986. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not performed any auditing procedures beyond the date of our opinion on the 1985 financial statements; accordingly, this report is based on our knowledge as of that date and should be read with that understanding.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter from Mr. F. A. Smith to the Regional Administrator, U.S. EPA Region V, dated March 14, 1986. It is understood that this report is solely for filing with the addressee of the accompanying letter, and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in items 6, 7, 8 and 11 under the caption Alternative I in the letter referred to above with the corresponding amounts in the financial statements referred to in the first paragraph.

2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph the information included in items 4, 5, 10 and 15 under the caption Alternative I in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative I in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 4, 5, 6, 7, 8, 10, 11 and 15 should be adjusted.

Deloitte Haskins + Sells

March 14, 1986

ATTACHMENT A

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID980568745
Facility EPA I.D. Number

GMC AC SPARK PLUG DIVISION AVERILL AVE PLANT
Name of Facility

1300 N DORT HWY
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48556
City or Town	**State**	**Zip Code**

4143 DAVISON RD
Facility Location (Street, Route No. or other specific identifier)

FLINT	GENESEE	MI	48556
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $69,200.00

MID005356647
Facility EPA I.D. Number

GMC AC SPARK PLUG DIVISION DORT HWY PLANT
Name of Facility

1300 N DORT HWY
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48556
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

FLINT	GENESEE	MI	48556
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $71,100.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID980568620
Facility EPA I.D. Number

GMC AC SPARK PLUG DIVISION ENGINEERING PLANT
Name of Facility

1300 N DORT HWY
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48556
City or Town	**State**	**Zip Code**

1601 N AVERILL AVE
Facility Location (Street, Route No. or other specific identifier)

FLINT	GENESEE	MI	48556
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $7,800.00

MID980568570
Facility EPA I.D. Number

GMC AC SPARK PLUG DIVISION WASTEWATER TREATMENT PLANT
Name of Facility

1300 N DORT HWY
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48556
City or Town	**State**	**Zip Code**

3026 ROBERT T LONGWAY BLVD
Facility Location (Street, Route No. or other specific identifier)

FLINT	GENESEE	MI	48556
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $NA

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356712
Facility EPA I.D. Number

GMC BOC GROUP FLINT BUICK OPERATIONS*
Name of Facility

902 E HAMILTON
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48550
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	GENESEE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $78,400.00

CURRENT POST-CLOSURE COST ESTIMATE OF FACILITY $1,903,500.00

*FORMERLY: GMC BUICK MOTOR DIVISION BUILDING 85

MID980568760
Facility EPA I.D. Number

GMC BOC GROUP DETROIT CENTRAL PLANT 37*
Name of Facility

6051 HASTINGS
Facility Mailing Address (Street or P.O. Box)

DETROIT	MI	48211
City or Town	**State**	**Zip Code**

920 MILWAUKEE
Facility Location (Street, Route No. or other specific identifier)

DETROIT	WAYNE	MI	48211
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 1,400.00

*FORMERLY: GMC FISHER BODY DIVISION CENTRAL PLANT 37

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356704
Facility EPA I.D. Number

GMC BOC GROUP DETROIT CLARK AVE PLANT*
Name of Facility

2860 CLARK ST
Facility Mailing Address (Street or P.O. Box)

DETROIT	MI	48232
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WAYNE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 39,500.00

*FORMERLY: GMC CADILLAC MOTOR CAR DIVISION CLARK PLANT

MID980795488
Facility EPA I.D. Number

GMC BOC GROUP HAMTRAMCK PLANT*
Name of Facility

2500 E GRAND BLVD
Facility Mailing Address (Street or P.O. Box)

DETROIT	MI	48211
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WAYNE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 130,000.00

*FORMERLY: GMC GM ASSEMBLY DIVISION HAMTRAMCK PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID000718544
Facility EPA I.D. Number

GMC BOC GROUP LAKE ORION PLANT*
Name of Facility

PO BOX 347
Facility Mailing Address (Street or P.O. Box)

LAKE ORION	MI	48035
City or Town	**State**	**Zip Code**

4555 GIDDINGS RD
Facility Location (Street, Route No. or other specific identifier)

LAKE ORION	OAKLAND	MI	48055
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 113,900.00

*FORMERLY: GMC GM ASSEMBLY DIVISION LAKE ORION PLANT

Ohio EPA 02-78-0356

OHD020632998
Facility EPA I.D. Number

GMC BOC GROUP LORDSTOWN ASSEMBLY PLANT*
Name of Facility

PO BOX 1406
Facility Mailing Address (Street or P.O. Box)

WARREN	OH	44482
City or Town	**State**	**Zip Code**

2300 HALLOCK-YOUND RD
Facility Location (Street, Route No. or other specific identifier)

LORDSTOWN	TRUMBULL	OH	44482
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 531,800.00

*FORMERLY: GMC GM ASSEMBLY DIVISION LORDSTOWN PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

Ohio EPA 02-78-0611

OHD083321091
Facility EPA I.D. Number

GMC BOC GROUP LORDSTOWN PRESSED METAL PLANT*
Name of Facility

PO BOX 1427
Facility Mailing Address (Street or P.O. Box)

WARREN	OH	44482
City or Town	**State**	**Zip Code**

2369 ELLSWORTH-BAILEY RD
Facility Location (Street, Route No. or other specific identifier)

LORDSTOWN	TRUMBULL	OH	44482
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 7,200.00

*FORMERLY: GMC FISHER BODY DIVISION LORDSTOWN PLANT

MID005356894
Facility EPA I.D. Number

GMC BOC GROUP LANSING OLDSMOBILE PLANT 1*
Name of Facility

920 TOWNSEND ST
Facility Mailing Address (Street or P.O. Box)

LANSING	MI	48921
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	INGHAM		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 37,500.00

*FORMERLY: GMC OLDSMOBILE DIVISION PLANT 1

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID980700827
Facility EPA I.D. Number

GMC BOC GROUP OLDSMOBILE PLANTS 2 & 3*
Name of Facility

920 TOWNSEND ST
Facility Mailing Address (Street or P.O. Box)

LANSING	MI	48921
City or Town	**State**	**Zip Code**

W SAGINAW ST
Facility Location (Street, Route No. or other specific identifier)

LANSING	INGHAM	MI	48917
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 1,125,700.00

*FORMERLY: GMC OLDSMOBILE DIVISION PLANTS 2 & 3

MID980700843
Facility EPA I.D. Number

GMC BOC GROUP OLDSMOBILE PLANT 5*
Name of Facility

920 TOWNSEND ST
Facility Mailing Address (Street or P.O. Box)

LANSING	MI	48921
City or Town	**State**	**Zip Code**

CANAL RD
Facility Location (Street, Route No. or other specific identifier)

LANSING	EATON	MI	48917
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 63,400.00

*FORMERLY: GMC OLDSMOBILE DIVISION PLANT 5

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356795
Facility EPA I.D. Number

GMC BOC GROUP WILLOW RUN PLANT*
Name of Facility

2625 TYLER RD
Facility Mailing Address (Street or P.O. Box)

YPSILANTI	MI	48197
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WASHTENAW		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 100,000.00

*FORMERLY: GMC GM ASSEMBLY DIVISION WILLOW RUN PLANT

Ohio Epa 03-20-0221
OHD005050273
Facility EPA I.D. Number

GMC CENTRAL FOUNDRY DIVISION DEFINACE PLANT
Name of Facility

PO BOX 70
Facility Mailing Address (Street or P.O. Box)

DEFIANCE	OH	43512
City or Town	**State**	**Zip Code**

STATE ROUTE 281 EAST
Facility Location (Street, Route No. or other specific identifier)

DEFIANCE	DEFIANCE	OH	43512
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 428,500.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID041793340
Facility EPA I.D. Number

GMC CENTRAL FOUNDRY DIVISION GREY & NODULAR IRON CASTING PLANTS*
Name of Facility

2100 VETERANS MEMORIAL PARKWAY
Facility Mailing Address (Street or P.O. Box)

SAGINAW	MI	48601
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	SAGINAW		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 15,700.00

*FORMERLY: GMC CHEVROLET MOTOR DIVISION SAGINAW CASTING & PARTS PLANT
GMC CHEVROLET MOTOR DIVISION SAGINAW PARTS PLANT CLOSED 10/1/83

MID005356696
Facility EPA I.D. Number

GMC CENTRAL FOUNDRY DIVISION SAGINAW MALLEABLE IRON PLANT
Name of Facility

77 W CENTER ST
Facility Mailing Address (Street or P.O. Box)

SAGINAW	MI	48605
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	SAGINAW		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 50,300.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356688
Facility EPA I.D. Number

GMC CPC GROUP BAY CITY PLANT*
Name of Facility

100 FITZGERALD ST
Facility Mailing Address (Street or P.O. Box)

BAY CITY	MI	48707
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	BAY		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 11,500.00

*FORMERLY: GMC CHEVROLET MOTOR DIVISION BAY CITY PLANT

Ohio EPA 05-31-0441

OHD004260089
Facility EPA I.D. Number

GMC CPC GROUP NORWOOD PLANT*
Name of Facility

4726 SMITH RD
Facility Mailing Address (Street or P.O. Box)

NORWOOD	OH	46212
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	HAMILTON		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 232,400.00

*FORMERLY: GMC GM ASSEMBLY DIVISION NORWOOD PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

Ohio EPA 02-18-0114

OHD086663101

Facility EPA I.D. Number

GMC CPC GROUP PARMA PLANT*

Name of Facility

PO BOX 6436

Facility Mailing Address (Street or P.O. Box)

CLEVELAND	OH	44101
City or Town	**State**	**Zip Code**

5400 CHEVROLET BOULEVARD

Facility Location (Street, Route No. or other specific identifier)

PARMA	CUYAHOGA	OH	44130
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 3,400.00

*FORMERLY: GMC CHEVROLET MOTOR DIVISION PARMA PLANT

MID005356886

Facility EPA I.D. Number

GMC CPC GROUP PONTIAC PLANT*

Name of Facility

1 PONTIAC PLAZA

Facility Mailing Address (Street or P.O. Box)

PONTIAC	MI	48053
City or Town	**State**	**Zip Code**

SAME AS ABOVE

Facility Location (Street, Route No. or other specific identifier)

	OAKLAND		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 44,000.00

*FORMERLY: GMC PONTIAC MOTOR DIVISION PONTIAC PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356910
Facility EPA I.D. Number

GMC CPC GROUP PONTIAC FIERO PLANT*
Name of Facility

900 BALDWIN AVE
Facility Mailing Address (Street or P.O. Box)

PONTIAC	MI	48055
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	OAKLAND		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 20,700.00

*FORMERLY: GMC PONTIAC MOTOR DIVISION P-CAR PLANT

MID000809905
Facility EPA I.D. Number

GMC CPC GROUP ROMULUS PLANT*
Name of Facility

36880 ECORSE RD
Facility Mailing Address (Street or P.O. Box)

ROMULUS	MI	48174
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WAYNE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 37,200.00

*FORMERLY: DETROIT DIESEL ALLISON ROMULUS PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

Ohio EPA 05-57-0115

OHD980569388
Facility EPA I.D. Number

GMC DETROIT DIESEL ALLISON DIVISION MORAINE ENGINE PLANT*
Name of Facility

PO BOX 1291
Facility Mailing Address (Street or P.O. Box)

DAYTON	OH	45401
City or Town	**State**	**Zip Code**

4100 SPRINGBORO PIKE
Facility Location (Street, Route No. or other specific identifier)

MORAINE	MONTGOMERY	OH	45439
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 85,000.00

*FORMERLY: GMC CHEVROLET MOTOR DIVISION MORAINE ENGINE PLANT

MID005356803
Facility EPA I.D. Number

GMC DETROIT DIESEL ALLISON DIVISION REDFORD PLANT
Name of Facility

13400 W OUTER DRIVE
Facility Mailing Address (Street or P.O. Box)

DETROIT	MI	48239
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WAYNE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 45,300.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

Ohio EPA 05-57-0273

OHD045557766
Facility EPA I.D. Number

GMC DELCO MORAINE DIVISION DAYTON NORTH PLANT
Name of Facility

1420 WISCONSIN BLVD
Facility Mailing Address (Street or P.O. Box)

DAYTON	OH	45401
City or Town	**State**	**Zip Code**

3100 NEEDMORE RD
Facility Location (Street, Route No. or other specific identifier)

DAYTON	MONTGOMERY	OH	45414
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 74,000.00

Ohio EPA 05-57-0274

OHD060928561
Facility EPA I.D. Number

GMC DELCO MORAINE DIVISION DAYTON SOUTH PLANT
Name of Facility

1420 WISCONSIN BLVD
Facility Mailing Address (Street or P.O. Box)

DAYTON	OH	45401
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	MONTGOMERY		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 75,400.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356845
Facility EPA I.D. Number

GMC DELCO MORAINE SAGINAW PLANT*
Name of Facility

2328 E GENESEE AVE
Facility Mailing Address (Street or P.O. Box)

SAGINAW	MI	48603
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	SAGINAW		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 22,900.00

*FORMERLY: GMC, CHEVROLET MOTOR DIVISION SAGINAW PLANT

Ohio EPA 05-57-0405

OHD004255410
Facility EPA I.D. Number

GMC DELCO PRODUCTS DIVISION KETTERING PLANTS
Name of Facility

PO BOX 1042
Facility Mailing Address (Street or P.O. Box)

DAYTON	OH	45401
City or Town	**State**	**Zip Code**

2000 FORRER BLVD
Facility Location (Street, Route No. or other specific identifier)

DAYTON	MONTGOMERY	OH	45420
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 80,400.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356621
Facility EPA I.D. Number

GMC DELCO PRODUCTS DIVISION LIVONIA PLANT*
Name of Facility

13000 ECKLES RD
Facility Mailing Address (Street or P.O. Box)

LIVONIA	MI	48151
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WAYNE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 98,700.00

*FORMERLY: GMC CHEVROLET MOTR DIVISION LIVONIA PLANT
GMC CPC GROUP LIVONIA PLANT

Ohio EPA 01-25-0440

OHD004294419
Facility EPA I.D. Number

GMC FISHER GUIDE DIVISION COLUMBUS PLANT*
Name of Facility

2000 GEORGESVILLE RD
Facility Mailing Address (Street or P.O. Box)

COLUMBUS	OH	43228
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	FRANKLIN		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 18,800.00

*FORMERLY: GMC FISHER BODY DIVISION COLUMBUS PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356787
Facility EPA I.D. Number

GMC FISHER GUIDE DIVISION DETROIT PLANT*
Name of Facility

6307 W FORT ST
Facility Mailing Address (Street or P.O. Box)

DETROIT	MI	48209
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WAYNE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 13,800.00

*FORMERLY: GMC FISHER BODY DIVISION FORT ST PLANT

Ohio EPA 02-47-0192

OHD004201091
Facility EPA I.D. Number

GMC FISHER GUIDE DIVISION ELYRIA PLANT*
Name of Facility

PO BOX 4025
Facility Mailing Address (Street or P.O. Box)

ELYRIA	OH	44036
City or Town	**State**	**Zip Code**

1400 LOWELL ST
Facility Location (Street, Route No. or other specific identifier)

ELYRIA	LORAIN	OH	44036
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 2,798,000.00

*FORMERLY: FISHER BODY DIVISION ELYRIA PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356654
Facility EPA I.D. Number

GMC FISHER GUIDE DIVISION FLINT MFG. PLANTS*
Name of Facility

300 N CHEVROLET AVE
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48555
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	GENESEE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 64,800.00

*FORMERLY: GMC CHEVROLET MOTOR DIVISION FLINT MFG. PLANTS
GMC CPC GROUP FLINT MFG PLANTS

MID005356860
Facility EPA I.D. Number

GMC FISHER GUIDE DIVISION FLINT PLANT*
Name of Facility

1245 E COLDWATER RD
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48559
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	GENESEE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 3,311,600.00

*FORMERLY: GMC FISHER BODY DIVISION COLDWATER RD PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID064169154
Facility EPA I.D. Number

GMC GENERAL MOTORS TECHNICAL CENTER
Name of Facility

30800 MOUND RD SERVICE SECTION
Facility Mailing Address (Street or P.O. Box)

WARREN	MI	48090
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	MACOMB		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 154,500.00

OHD045719895
Facility EPA I.D. Number

GMC GM WAREHOUSING & DISTRIBUTION DIVISION CLEVELAND PLANT
Name of Facility

6060 W BRISTOL RD
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48554
City or Town	**State**	**Zip Code**

12990 SNOW RD
Facility Location (Street, Route No. or other specific identifier)

PARMA	CUYAHOGA	OH	44130
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 3,900.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID003912920
Facility EPA I.D. Number

GMC GM WAREHOUSING & DISTRIBUTION DIVISION DRAYTON PLAINS PLANT
Name of Facility

6060 W BRISTOL RD
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48554
City or Town	**State**	**Zip Code**

5260 WILLIAMS LAKE RD
Facility Location (Street, Route No. or other specific identifier)

DRAYTON PLAINS	OAKLAND	MI	48020
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 62,200.00

MID003906773
Facility EPA I.D. Number

GMC GM WAREHOUSING & DISTRIBUTION DIVISION FLINT PLANT
Name of Facility

6060 W BRISTOL RD
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48554
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	GENESEE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 612,100.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

Ohio EPA 05-57-0256

OHD017958604
Facility EPA I.D. Number

GMC HARRISON RADIATOR DIVISION DAYTON PLANT
Name of Facility

PO BOX 824
Facility Mailing Address (Street or P.O. Box)

DAYTON	OH	45401
City or Town	**State**	**Zip Code**

300 TAYLOR ST
Facility Location (Street, Route No. or other specific identifier)

DAYTON	MONGOMERY	OH	45401
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 33,600.00

Ohio EPA 05-57-0272

OHD000817577
Facility EPA I.D. Number

GMC HARRISON RADIATOR DIVISION MORAINE PLANT
Name of Facility

PO BOX 824
Facility Mailing Address (Street or P.O. Box)

DAYTON	OH	45401
City or Town	**State**	**Zip Code**

3600 DRYDEN RD
Facility Location (Street, Route No. or other specific identifier)

MORAINE	MONTGOMERY	OH	44439
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 250,700.00

CURRENT POST-CLOSURE COST ESTIMATE OF FACILITY $ 3,900,000.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID000724740
Facility EPA I.D. Number

GMC HYDRA-MATIC DIVISION CONSTANTINE PLANT
Name of Facility

ONE HYDRA-MATIC DR
Facility Mailing Address (Street or P.O. Box)

THREE RIVERS	MI	49093
City or Town	**State**	**Zip Code**

INDUSTRIAL PARK
Facility Location (Street, Route No. or other specific identifier)

CONSTANTINE	ST JOSEPH	MI	49042
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 47,000.00

MID000718551
Facility EPA I.D. Number

GMC HYDRA-MATIC DIVISION THREE RIVERS PLANT
Name of Facility

ONE HYDRA-MATIC DR
Facility Mailing Address (Street or P.O. Box)

THREE RIVERS	MI	49093
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	ST JOSEPH		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 17,000.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID270012560
Facility EPA I.D. Number

GMC HYDRA-MATIC DIVISION YPSILANTI PLANT
Name of Facility

WILLOW RUN
Facility Mailing Address (Street or P.O. Box)

YPSILANTI	MI	48197
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WASHTENAW		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 14,300.00

MID084571256
Facility EPA I.D. Number

GMC INLAND DIVISION ADRIAN PLANT*
Name of Facility

1450 E BEECHER ST
Facility Mailing Address (Street or P.O. Box)

ADRIAN	MI	49221
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	LENAWEE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 23,100.00

*FORMERLY: GMC CHEVROLET MOTOR DIVISION ADRIAN PLANT
GMC CPC GROUP ADRIAN PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

Ohio EPA 05-57-0317

OHD000817023
Facility EPA I.D. Number

GMC INLAND DIVISION DAYTON PLANT
Name of Facility

PO BOX 1224
Facility Mailing Address (Street or P.O. Box)

DAYTON	OH	45401
City or Town	**State**	**Zip Code**

2701 HOME AVE
Facility Location (Street, Route No. or other specific identifier)

DAYTON	MONTGOMERY	OH	45417
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 42,200.00

Ohio EPA 02-18-0260

OHD097622336
Facility EPA I.D. Number

GMC INLAND DIVISION EUCLID PLANT*
Name of Facility

20001 EUCLID AVE
Facility Mailing Address (Street or P.O. Box)

CLEVELAND	OH	44117
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	CUYAHOGA		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 32,900.00

*FORMERLY: GMC FISHER BODY DIVISION EUCLID PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

Ohio EPA 05-57-0316

OHD052151701
Facility EPA I.D. Number

GMC INLAND DIVISION VANDALIA PLANT
Name of Facility

PO BOX 1224
Facility Mailing Address (Street or P.O. Box)

DAYTON	OH	45401
City or Town	**State**	**Zip Code**

480 N DIXIE DR
Facility Location (Street, Route No. or other specific identifier)

VANDALIA	MONTGOMERY	OH	45337
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 54,400.00

MID020105565
Facility EPA I.D. Number

GMC NEW DEPARTURE-HYATT BEARINGS DIVISION DETROIT PLANT*
Name of Facility

8435 ST AUBIN
Facility Mailing Address (Street or P.O. Box)

DETROIT	MI	48212
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WAYNE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 25,000.00

*FORMERLY: GMC CHEVROLET MOTOR DIVISION DETROIT FORGE PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

Ohio EPA 03-22-0464

OHD001880442
Facility EPA I.D. Number

GMC NEW DEPARTURE-HYATT BEARINGS DIVISION SANDUSKY PLANT
Name of Facility

2509 HAYES AVE
Facility Mailing Address (Street or P.O. Box)

SANDUSKY	OH	44870
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	ERIE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 389,200.00

Ohio EPA 02-78-0123

OHD018414292
Facility EPA I.D. Number

GMC PACKARD ELECTRIC DIVISION WARREN CITY PLANT
Name of Facility

PO BOX 431
Facility Mailing Address (Street or P.O. Box)

WARREN	OH	44486
City or Town	**State**	**Zip Code**

408 DANA ST
Facility Location (Street, Route No. or other specific identifier)

WARREN	TRUMBULL	OH	44482
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 14,400.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

Ohio EPA 02-78-0124
OHD000817346
Facility EPA I.D. Number

GMC PACKARD ELECTRIC DIVISION NORTH RIVER ROAD PLANTS
Name of Facility

PO BOX 431
Facility Mailing Address (Street or P.O. Box)

WARREN	OH	44486
City or Town	**State**	**Zip Code**

N RIVER RD AT LARCHMONT
Facility Location (Street, Route No. or other specific identifier)

WARREN	TRUMBULL	OH	44484
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 147,700.00

MID082220757
Facility EPA I.D. Number

GMC PROVING GROUND MILFORD
Name of Facility

HICKORY RIDGE & GM ROAD
Facility Mailing Address (Street or P.O. Box)

MILFORD	MI	48042
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	OAKLAND		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 7,400.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID017079625
Facility EPA I.D. Number

GMC ROCHESTER PRODUCTS DIVISION GRAND RAPIDS PLANT*
Name of Facility

2100 BURLINGAME
Facility Mailing Address (Street or P.O. Box)

GRAND RAPIDS	MI	49501
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	KENT		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 46,400.00

*FORMERLY: GMC DIESEL EQUIPMENT DIVISION GRAND RAPIDS PLANT

MID000721738
Facility EPA I.D. Number

GMC ROCHESTER PRODUCTS DIVISION COOPERSVILLE PLANT*
Name of Facility

2100 BURLINGAME
Facility Mailing Address (Street or P.O. Box)

GRAND RAPIDS	MI	49501
City or Town	**State**	**Zip Code**

999 RANDALL
Facility Location (Street, Route No. or other specific identifier)

COOPERSVILLE	OTTAWA	MI	49404
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 1,400.00

*FORMERLY: GMC DIESEL EQUIPMENT DIVISION COOPERSVILLE PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID086744802
Facility EPA I.D. Number

GMC SAGINAW DIVISION DETROIT PLANT*
Name of Facility

1840 HOLBROOK
Facility Mailing Address (Street or P.O. Box)

DETROIT	MI	48212
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WAYNE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 116,200.00

FORMERLY: GMC CHEVROLET MOTOR DIVISION DETROIT GEAR & AXLE PLANT
GMC SAGINAW STEERING GEAR DIVISION DETROIT PLANT

Ohio EPA 05-57-0116

OHD041063074
Facility EPA I.D. Number

GMC TRUCK & BUS MANUFACTURING GROUP MORAINE ASSEMBLY PLANT*
Name of Facility

PO BOX 1291
Facility Mailing Address (Street or P.O. Box)

DAYTON	OH	45401
City or Town	**State**	**Zip Code**

2601 W STROOP
Facility Location (Street, Route No. or other specific identifier)

DAYTON	MONTGOMERY	OH	45439
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 265,900.00

*FORMERLY: GMC CHEVROLET MOTOR DIVISION MORAINE ASSEMBLY PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID076380583
Facility EPA I.D. Number

GMC TRUCK & BUS OPERATIONS DETROIT ASSEMBLY
Name of Facility

601 PIQUETTE
Facility Mailing Address (Street or P.O. Box)

DETROIT	MI	48202
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WAYNE		48202
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 4,500.00

MID005356951
Facility EPA I.D. Number

GMC TRUCK & BUS OPERATIONS VAN SLYKE COMPLEX PLANTS*
Name of Facility

G 3248 VAN SLYKE RD
Facility Mailing Address (Street or P.O. Box)

FLINT	MI	48552
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	GENESEE		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 250,000.00

*FORMERLY: GMC CHEVROLET MOTOR DIVISION PLANT VAN SLYKE COMPLEX PLANTS
GMC CHEVROLET MOTOR DIVISION METAL FAB PLANT
GMC CHEVROLET MOTOR DIVISION V8 ENGINE PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION V

MID005356902
Facility EPA I.D. Number

GMC TRUCK & BUS OPERATIONS PONTIAC EAST & CENTRAL PLANTS*
Name of Facility

660 S BLVD E
Facility Mailing Address (Street or P.O. Box)

PONTIAC	MI	48053
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	OAKLAND		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 338,400.00

*FORMERLY: GMC TRUCK & COACH DIVISION PONTIAC EAST PLANT

MID980568836
Facility EPA I.D. Number

GMC TRUCK & BUS OPERATIONS PONTIAC WEST ASSEMBLY PLANT*
Name of Facility

660 S BLVD E
Facility Mailing Address (Street or P.O. Box)

PONTIAC	MI	48053
City or Town	**State**	**Zip Code**

275 FRANKLIN RD
Facility Location (Street, Route No. or other specific identifier)

PONTIAC	OAKLAND	MI	48053
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 33,100.00

*FORMERLY: GMC TRUCK & COACH DIVISION PONTIAC EAST PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION VII

IAD000686899
Facility EPA I.D. Number

GMC ROCHESTER PRODUCTS DIVISION SIOUX CITY PLANT
Name of Facility

1805 ZENITH DR
Facility Mailing Address (Street or P.O. Box)

SIOUX CITY	IA	51103
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	WOODBURY		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 10,200.00

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION IX

CAD008295719
Facility EPA I.D. Number

GMC CPC GROUP SOUTHGATE PLANT*
Name of Facility

2700 TWEEDY BLVD
Facility Mailing Address (Street or P.O. Box)

SOUTHGATE	CA	90280
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	LOS ANGELES		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 118,100.00

*FORMERLY: GMC GM ASSEMBLY DIVISION SOUTHGATE PLANT

CAD000051458
Facility EPA I.D. Number

GMC CPC GROUP VAN NUYS PLANT*
Name of Facility

8000 VAN NUYS PLANT*
Facility Mailing Address (Street or P.O. Box)

VAN NUYS	CA	91409
City or Town	**State**	**Zip Code**

SAME AS ABOVE
Facility Location (Street, Route No. or other specific identifier)

	LOS ANGELES		
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 141,700.00

*FORMERLY: GMC GM ASSEMBLY DIVISION VAN NUYS PLANT

GENERAL MOTORS CORPORATION FACILITIES - U.S. EPA REGION IX

CAD009305848
Facility EPA I.D. Number

GMC DEFENSE OPS & PWR PROD GROUP SANTA BARBARA PLANT*
Name of Facility

700 E FIRMIN ST
Facility Mailing Address (Street or P.O. Box)

KOKOMO	IN	46902
City or Town	**State**	**Zip Code**

6767 HOLLISTER AVE
Facility Location (Street, Route No. or other specific identifier)

GOLETA	SANTA BARBARA	CA	93017
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 15,100.00

*FORMERLY: GMC DELCO ELECTRONICS DIVISION SANTA BARBARA PLANT

CAD008323396
Facility EPA I.D. Number

GMC DELCO-REMY DIVISION ANAHEIM PLANT
Name of Facility

PO BOX 3190
Facility Mailing Address (Street or P.O. Box)

ANAHEIM	CA	92803
City or Town	**State**	**Zip Code**

1201 MAGNOLIA AVE
Facility Location (Street, Route No. or other specific identifier)

ANAHEIM	ORANGE	CA	92801
City or Town	**County**	**State**	**Zip Code**

CURRENT CLOSURE COST ESTIMATE OF FACILITY $ 13,900.00

NOTE 16. (concluded)

(Dollars in Millions)	1985
Profits as Defined in the Plans	
Net Income in the U.S.	$3,624.3
Add (Deduct): Net income of excluded subsidiaries and associates	(45.3)
Income taxes of U.S. operations	1,275.1
Provision for the General Motors Incentive Program applicable to U.S. operations	239.0
Profit sharing accrual	180.3
Profits as defined in the Plans	$5,273.4

Profit Sharing Accrual			
Profits as defined in the Plans	$5,273.4		
Deduct Minimum Annual Return as defined in the Plans	3,202.2		
Profits in excess of Minimum Annual Return	$2,071.2	X 10% =	$ 207.1
Deduct:			
Diversion for Guaranteed Income Stream Benefit Program and Income Protection Plan	$ 20.1		
Portion of profit sharing allocable to non-participating employes	6.7		26.8
Profit Sharing Accrual			$ 180.3

NOTE 17. Contingent Liabilities

There are serious potential liabilities under government regulations pertaining primarily to environmental, fuel economy and safety matters, but the ultimate liability under these regulations is not expected to have a material adverse effect on the Corporation's consolidated financial position. There are also various claims and pending actions against the Corporation and its subsidiaries with respect to commercial matters, including warranties and product liability, civil rights, antitrust, patent matters, taxes and other matters arising out of the conduct of the business. Certain of these actions purport to be class actions, seeking damages in very large amounts. The amounts of liability on these claims and actions at December 31, 1985 were not determinable but, in the opinion of the management, the ultimate liability resulting should not have a material adverse effect on the Corporation's consolidated financial position.

ACCOUNTANTS' REPORT

Deloitte Haskins + Sells
CERTIFIED PUBLIC ACCOUNTANTS

1114 Avenue of the Americas
New York, New York 10036

General Motors Corporation, its Directors and Stockholders:

February 3, 1986

We have examined the Consolidated Balance Sheet of General Motors Corporation and consolidated subsidiaries as of December 31, 1985 and 1984 and the related Statements of Consolidated Income and Changes in Consolidated Financial Position for each of the three years in the period ended December 31, 1985. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, these financial statements present fairly the financial position of the companies at December 31, 1985 and 1984 and the results of their operations and the changes in their financial position for each of the three years in the period ended December 31, 1985, in conformity with generally accepted accounting principles applied on a consistent basis.

Deloitte Haskins + Sells

OhioEPA
State Of Ohio Environmental Protection Agency
P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049
(614) 466-8565

Richard F. Celeste, Governor

RE: General Motors Corp.
OHD 004260089
OHD 050502273
OHD 045557766
OHD 060928561
OHD 004255410
OHD 097622336
OHD 004294419
OHD 004201091
OHD 017958604
OHD 000817577
OHD 052151701
OHD 000817023
OHD 020632998
OHD 041063074
OHD 980569388
OHD 001880442
OHD 018414292
OHD 000817346
OHD 083321091

Mr. Mitchell P. Zydb
Env. Activities Staff
General Motors Corp.
General Motors Technical Center
30400 Mound Road
Warren, MI 48090-9015

July 28, 1986

Dear Mr. Zydb:

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

Ohio EPA has completed its review of General Motors Corp.'s financial test submission. In general, General Motors Corp. appears to meet the financial test criteria. However, I have noted some problems that

should be corrected or clarified concerning the financial test demonstration. Please clarify or correct the following:

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

  No Change:
  OHD 005050273
  KSD 007145899

  Decreased from March 1985 filing:

TXC 008018004	LAD 089317341
IND 000803734	MID 005356712
IND 006036099	MID 005356795
ILD 005141551	MID 041793340
IND 006413348	MID 005356688
ILK 006009690	MID 000809905
OHD 097622336	MID 005356951
OHD 000817346	MID 082220757
MSD 065462517	WID 007114813

- Explain why the closure costs for the following facilities were not included in this year's financial test filing:

  OHD 000817585
  OHD 041063074
  MAD 019369602
  NYD 012871489
  NYD 002026565
  IND 094469913
  IND 000806802
  TXD 095217204
  LAD 067033944
  MOD 000822668
  IAD 000686899
  CAD 008295719
  CAD 000051458
  CAD 009305848

There are several different closure costs on file. Explain differences in these reported amounts:

	Cost from the Financial Test	Cost as Indicated in the Annual Report	Cost Amount on File in our District Office
OHD 004260089	$ 232,400	$ 224,900	None
OHD 005050273	428,500	454,000	None
OHD 045557766	74,000	74,000	None
OHD 060928561	75,500	75,400	None
OHD 004255410	80,400	77,300	$ 77,300
OHD 097622336	32,900	28,500	28,500
OHD 004294419	18,800	20,000	None
OHD 004201091 closure	2,798,000	2,680,000	2,606,000
post closure	None	1,000,000	None
OHD 017958604	33,600	33,600	None
OHD 000817577 closure	250,700	4,150,695	None
post closure	3,900,000	130,000	None
OHD 052151701	54,400	42,200	46,000,000
OHD 000817023	42,200	54,400	36,900
OHD 020632998	531,800	350,100	865,314
OHD 041063074	265,900	265,900	None
OHD 980569388	85,000	132,600	None
OHD 001880442	389,200	403,000	None
OHD 018414292	14,400	14,400	None
OHD 000817346	147,700	148,200	1,874,300
OHD 083321091	7,220	None	None

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

Sincerely,

Edward A. Kitchen

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

cc: Dave Sholtis, DSHWM
Thomas R. Wirth, GMC
J. F. Darst, GMC
Karen J. Berner, GMC
John S. Takach, GMC
Mark Dryden, GMC
L. P. Randall, GMC
Robert E. Kerr, GMC
Gerry Killeen, GMC
Howard P. Jordan, GMC
Raymond Stiger, GMC
David V. Kloppenburg, GMC
Vincent Festa, GMC
David Munson, GMC
Charles B. Hogan, GMC
Dave Wertz, NEDO
Ben Chambers, NWDO
Steve Hamlin, SEDO
Don Marshall, SWDO
Steve Rath, CDO

DTW217888327

O: WMD
cc: RF

GM

General Motors Corporation

RECEIVED
APR 04 1983
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Mr. Valdas V. Adamkus
Regional Administrator
U.S. EPA Region V
230 S. Dearborn
Chicago, IL 60604

Dear Mr. Adamkus:

I am the chief financial officer of General Motors Corporation, 3044 West Grand Boulevard, Detroit, Michigan 48202. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Attachments A and B.

The firm identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm: None.

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Attachments A and B.

2. The firm identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Attachment B.

RECEIVED
APR 1983
U.S. EPA REGION 5

9275f-75

COPY

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility: None.

This firm is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1987.

ALTERNATIVE I
($ In Millions)

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 59.1
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 8.0
3.	Sum of lines 1 and 2	$ 67.1
*4.	Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	$ 54,196.8
*5.	Tangible net worth	$ 28,038.7
*6.	Net worth	$ 33,225.1
*7.	Current assets	$ 39,771.5
*8.	Current liabilities	$ 25,528.2
9.	Net working capital (line 7 minus line 8)	$ 14,243.3
*10.	The sum of net income plus depreciation, depletion, and amortization	$ 9,662.9
*11.	Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	$ 68,168.1

		YES	NO
12.	Is line 5 at least $10 million?	X	
13.	Is line 5 at least 6 times line 3?	X	
14.	Is line 9 at least 6 times line 3?	X	
*15.	Are at least 90% of assets located in the U.S.? If not complete line 16.		X
16.	Is line 11 at least 6 times line 3?	X	
17.	Is line 4 divided by line 6 less than 2.0?	X	
18.	Is line 10 divided by line 4 greater than 0.1?	X	
19.	Is line 7 divided by line 8 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below..

F. A. Smith
Executive Vice President
March 30, 1988

Deloitte Haskins + Sells

1114 Avenue of the Americas
New York, New York 10036-7778
(212) 790-0500
International Telex: 66262
ITT Telex: 4995707

General Motors Corporation:

We have examined the Consolidated Balance Sheet of General Motors Corporation (the "Corporation") and consolidated subsidiaries as of December 31, 1987 and the related Statements of Consolidated Income and Changes in Consolidated Financial Position for the year then ended, and have issued our opinion thereon dated February 8, 1988. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not performed any auditing procedures beyond the date of our opinion on the 1987 financial statements; accordingly, this report is based on our knowledge as of that date and should be read with that understanding.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter from Mr. F. A. Smith to the Regional Administrator, U.S. EPA Region V, dated March 30, 1988. It is understood that this report is solely for filing with the addressee of the accompanying letter, and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in items 6, 7, 8 and 11 under the caption Alternative I in the letter referred to above with the corresponding amounts in the financial statements referred to in the first paragraph.

2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph the information included in items 4, 5, 10 and 15 under the caption Alternative I in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative I in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 4, 5, 6, 7, 8, 10, 11 and 15 should be adjusted.

Deloitte Haskins & Sells

March 30, 1988

ORIGINAL COPY OF LETTER AND ENCLOSURE (1987 ANNUAL REPORT) ARE FILED AT:

OHD 020 632 998
GMC BOC LORDSTOWN ASSEMBLY
LORDSTOWN, OHIO

B. Permit Application /Post Permit

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

22 APR 1988

REPLY TO THE ATTENTION OF:
5HS-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

due 10-25-88

Robert Hare
Environmental Engineer
General Motors Corporation
New Departure - Hyatt
2509 Hayes Avenue
Sandusky, Ohio 44870

RE: Part B Call-in
General Motors Corporation
OHD 001880442

Dear Mr. Hare:

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

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

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

5HS-JCK-13 OHD 001880442

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. ↑(Extra charge)↑
2. ☐ Restricted Delivery ↑(Extra charge)↑

3. Article Addressed to:
Robert Hare
2509 Hayes Ave
Sandusky, Oh 44870

4. Article Number
P 707 063 311

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's Address (ONLY if requested and fee paid)

Signature — Addressee

Signature — Agent
Kenneth R Miller

Date of Delivery
4-25-88

Form 3811, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 DOMESTIC RETURN RECEIPT

Heller

P 707 063 311

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Robert Hare	
Street and No. 2509 Hayes Ave	
P.O., State and ZIP Code Sandusky, Oh 44870	
Postage	$ 3.18
Certified Fee	85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 4.93
Postmark or Date	

5HS-JCK-13 OHD 001880442

PS Form 3800, June 1985

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

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

The Agency is committed to conducting the RCRA permitting process as efficiently as possible. Consequently, you may want to contact Mr. Donald Heller of my staff, at (312) 353-1248, to discuss any questions or concerns you have regarding the preparation of the application. Mr. Heller will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

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

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

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

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

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

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

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

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

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

Sincerely,

Wm. E. Muno

William E. Muno
Acting Associate Division Director
Office of RCRA

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

cc: Paul Flanigan, OEPA
District Office Manager, OEPA
Ed Lim, OEPA

New Departure Hyatt

October 18, 1988

RECEIVED
NOV 3 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

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

Dear Mr. Hamper:

On April 22, 1988, your office forwarded to the writer a Part "B" Call-In (EPA I.D. Number OHD001880442). After thoroughly reviewing our operation and considering the low volume of hazardous waste generated and disposed of each year, a decision has been made to revert to Generator Status under the Resource Conservation and Recovery Act of 1980.

Originally in 1980, the need for a RCRA Permit was questionable, but the uncertainty in all the ramifications of these regulations prompted us to apply for Part "A" interim status so drums generated by this facility could be stored beyond the 90 days accumulation period.

Herein, then, please find a Closure Plan that will allow this facility to complete the administrative requirements necessary to close the On Site Storage Facility and allow continued use of the physical structure as a 90 day accumulation area.

If you have any questions regarding this matter, please contact the writer at (419) 627-7076.

Sincerely,

Robert W. Hare
Environmental Engineer

dor
Encl

cc: Ohio EPA, Division of Solid and Hazardous Waste Management Program
Planning and Management Section
Mr. Ben Chambers, Ohio EPA, Northwest District Office, Bowling Green, Ohio.

CLOSURE PLAN

FOR

HAZARDOUS WASTE STORAGE FACILITY

AT

NEW DEPARTURE HYATT

DIVISION OF GENERAL MOTORS CORPORATION

2509 HAYES AVENUE

SANDUSKY, OHIO 44870

ROBERT W. HARE

OCTOBER 18, 1988

I. INTRODUCTION

New Departure Hyatt is a manufacturer of automotive and non-automotive bearings. The operations included in this facility include, machining, grinding, washing, plating, heat treating, and assembly. The manufacturing building is approximately 900,000 square feet of the total 1,300,000 square feet. The remaining area is office/administrative operations. The total site is approximately 133 acres enclosed by fence and is manned for security 24 hours a day, 365 days per year. The attached site sketch shows the location of the subject storage facility. Under the U.S. EPA Regulations, 40 CFR Part 265, Subpart G, Sections 265.110 through 265.120, each facility which stores, treats, or disposes of Hazardous Wastes must have a Closure Plan on file. This Closure Plan has been prepared for the following storage facility:

A. EPA Identification Number: OHD001880442

B. Owner's Name: General Motors Corporation
New Departure Hyatt Division
2509 Hayes Avenue
Sandusky, Ohio 44870

C. This Plan has been prepared by: Robert W. Hare
October 18, 1988
(419) 627-7076

This Closure Plan is intended to effectively close the subject facility as a RCRA storage facility and convert it to an accumulation site. In 1980 New Departure Hyatt submitted a Part "A" permit application as a precautionary measure to provide time to evaluate the need to maintain TSDF operating status. As the Part "B" permit application has been called in, New Departure Hyatt, Sandusky, Ohio has determined that a Part "B" permit is not necessary for these operations and herein requests closure approval to allow conversion to generator only status.

II. FACILITY DESCRIPTION

The storage facility is approximately 13' X 14'-10" in plan and is constructed with a concrete containment foundation and block walls. The roof is standard wood framing with asphalt shingle. The building is vented and skylights are used for lighting in lieu of electrical lighting. All activities associated with this facility take place during daylight hours. A detailed scale drawing of the storage facility is attached.

The material stored in the area is loaded onto the transporter's truck using fork trucks. The drums are thoroughly inspected weekly and checked for excessive rusting or loose bungs. If any drums pose danger of releasing material, the appropriate supervisory personnel are contacted to transfer the waste material into a new drum. Drums are shipped for disposal every three (3) to four (4) months to minimize the potential for waste release. Disposal of waste after closure would occur within ninety (90) days of accumulation start date.

III. PROCEDURES FOR DECONTAMINATION AND/OR DISPOSAL

As the storage area is a completely contained facility and no releases from it have occurred, no soil sampling is necessary.

The concrete surface within the storage facility will be cleaned using a cleaning solution of Detrex 44 and water. The detergent collected after cleaning will be analyzed for EP Toxicity Metals and all RCRA waste solvents that were stored in the facility. This detergent shall be considered contaminated if the detergent sample contains greater than 1 mg/l of any RCRA regulated solvents analyzed or greater than 5 mg/l Total Chromium. This cleaning process will be repeated until the above detergent contaminant levels have been achieved.

All analytical and sampling methods shall be as follows:

Water Samples - U.S. EPA Methods for Chemical Analysis of Water and Waste (EPA-600)

Water Analyzed - U.S. EPA Methods for Chemical Analysis of Water and Waste (EPA-600)

Any concrete found to be contaminated will be scarified and placed into a 55 gallon drum for transportation to the disposal site. The container will be lined as necessary to contain any free liquids that could be present due to wet conditions. Any contaminated concrete will be disposed of at the secure landfill of Fondessey Enterprises, Oregon, Ohio pending the necessary approvals.

The storage facility shall be determined to be "cleaned" based on the chromium level found in water samples as compared to levels specified for EP Toxicity Test Procedures. Once this determination is made, closure will be certified by the Owner's designated representative and independent registered professional engineer

IV. SCHEDULE OF CLOSING

Since the date the Closure Plan will be approved is not known at this time, the timetable listed below is based on the number of calendar days from date of approval (See Section 265.112 [c].

30 Days	Remaining wastes in storage removed to Environmental Waste Control, Inc., Inkster, Michigan for disposal.*
60 Days	Begin detergent wash of concrete surfaces.
90 Days	Complete analyses necessary to certify area is "cleaned".
150 Days	Certify closure by an independent registered professional engineer[3] and remove all warning signs.

V. COST ESTIMATES FOR CLOSURE

Prepared by: _____
Robert W. Hare
Environmental Engineer

Disposal of Remaining Drums in Storage	$ 10,000**
Water Sample Analysis	$ 2,500
Decontamination Cost (if necessary)[2]	$ 5,000
Disposal Cost of Concrete (if necessary)[2]	$ 3,000
Certification Cost	$ 5,000
Total	$ 25,000

* Vendor may vary depending on disposal contract in effect at that time.

** This is a maximum possible cost (40 drums maximum at $250/drum).

[2] These costs could vary depending upon degree of contamination, if any.

[3] Anticipated to be Burgess and Niple, Ltd., Columbus, Ohio.

NEW DEPARTURE HYATT
DIVISION OF GENERAL MOTORS

March 12, 1986

RCRA Activities
Region V
Post Office Box A3587
Attn: ATKJG
Chicago, Illinois 60690

Dear Messieurs and Mesdames:

Enclosed please find the completed certification statement that you requested in your letter of January 30, 1986.

The area map enclosed was submitted with the Part "A" Application and shows the same facilities with the exception of the refuse compactor (container storage area), the chromium recovery equipment, and the above ground reclaimed oil storage tank. These items have been added to the map for the purposes of this survey.

If you have any questions regarding the contents of this certification, please call the writer at (419) 627-7076.

Sincerely,

Robert W. Hare

Robert W. Hare
Environmental Engineer

dor
Encl

Lets Get It Together
SAFETY BELTS SAVE LIVES

2509 HAYES AVENUE • SANDUSKY, OHIO 44870 • PHONE (419) 627-7000

S Miner

NEW DEPARTURE HYATT BEARINGS
DIVISION OF GENERAL MOTORS

RECEIVED
WASTE MANAGEMENT BRANCH

February 13, 1984

Mr. Dave Ferguson
Northwest District Office
Ohio E. P. A.
1035 Devlac Grove Drive
Bowling Green, Ohio 43402

OHD 001 880 442 G, TSD, PA

Dear Mr. Ferguson:

A recent review of the Hazardous Waste activities at this facility indicated an alteration to the existing Operating Permit (Number 03-22-0464) is necessary.

The completed Form 3 Hazardous Waste Permit Application (excluding maps and sketches) is enclosed. Please note the following changes:

Page 3 of 5

Item IV

A. All estimated weights have been updated to reflect more accurate information.

B. The following materials have been added to the list:

Line 3 - U013, Asbestos ← not a hz wz! was deleted from list.

Line 2 - P029, Copper Cyanide

Line 8 - Lead

If you have any questions regarding this matter, please call the writer at (419) 627-7076.

Sincerely,

Robert W. Hare

Robert W. Hare
Environmental Engineer

RECEIVED 2-24-84

dor
Encl

cc: Mr. Karl J. Kelpisch, Jr., Chief, Waste Management Branch
U. S. E. P. A., Region V

2509 HAYES AVENUE • SANDUSKY, OHIO 44870 • PHONE (419) 627-7000

C.2 Compliance And Enforcement

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

RECEIVED
WMD RECORD CENTER
JAN 06 1995

~~Inspect~~ ~~RCRIS~~ LS
TC/LB
USEPA

George V. Voinovich
Governor

Re: Delco Moraine NDH Division
OHD 001 880 442
Hazardous Waste
Erie County 010/002

December 6, 1991

RECEIVED
FEB 19 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RECEIVED
OHIO EPA
DEC 11 1991
DIV. of HAZARDOUS WASTE MGT.

Mr. Robert Hare
Sr. Environmental Engineer
Delco Moraine NDH Division
General Motors Corporation
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Hare:

On November 21, 1991, the Ohio Environmental Protection Agency conducted a hazardous waste compliance evaluation inspection of Delco Moraine NDH Division located in Sandusky, Ohio. This inspection was conducted in order to determine Delco Moraine NDH Division's compliance with Ohio's generator; and, treatment, storage and disposal facility regulations as adopted under Chapter 3745 of the Ohio Administrative Code (OAC). Delco Moraine NDH Division was represented by John Berent and yourself. The Ohio EPA was represented by Mike Porter and Philip Williams, the writer. The Agency's inspection included a tour of your facility and a review of written documentation. Delco Moraine NDH Division is a manufacturer of automobile bearings. Hazardous wastes generated at this site include D001 petroleum naptha, D001 mineral spirits, D007 chrome plating waste, F001 freon solvent and F005 paint thinner waste.

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

1. OAC 3745-52-11

Delco Moraine NDH failed to adequately evaluate the waste streams generated at the facility. The facility must submit to the Ohio EPA, Northwest District Office a waste evaluation for the following waste streams:

1. Spent Nickel Catalyst
2. Waste ink located in the hazardous waste container storage building.
3. Waste solvent located in the hazardous waste container storage building.
4. Spent filters used in the paint booth.
5. Spent chrome plating filters

Printed on recycled paper

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

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

A copy of the completed inspection form is enclosed for your review. If you have any questions, please advise.

Sincerely,

Philip A. Williams
Division of Hazardous
Waste Management

/pd

Enclosures

pc: Laurie Stevenson, DHWM, CO
Cindy Lohrbach, DHWM, NWDO
NWDO file
A & C Representative

TCLP ANALYSIS OF GENERAL MOTORS WASTES

Report Prepared by

ZENON ENVIRONMENTAL LABORATORIES
5555 NORTH SERVICE ROAD
Burlington, Ontario
L7L 5H7

File No.: AN909149 October 31, 1990

Scope of Work:

A variety of waste samples submitted for analysis by Mr. Robert W. Hare, P.E., Senior Environmental Engineer, DMDDH, Sandusky, were subjected to the TCLP leachate procedure. The methodologies employed and results obtained are tabulated below.

Leachate Procedure:

In every case the TCLP / ZHE protocols as described in 40 CFR Part 261 of March 29, 1990 were followed. Two different analytical schemes were used, dependent on sample type.

Waste Oils (4,5) and waste solvents (11, 15, 16, 17, 20):

Samples were defined as liquids as per the protocol and the waste was thus defined as the TCLP extract. Appropriate aliquots were taken and analysed as follows:

Parameter	Method	SW 846 reference
Metals	acid digestion, ICP	6010
Arsenic, Selenium	acid digestion, hydride generation	7061, 7741
Mercury	acid digestion, cold vapour FAAS	7470, 7471
OC Pesticides, NCO's	dilute, GC/ECD/FID	8040, 8080
Semivolatiles		8090, 8120
Volatiles	dilute, GC/ECD/FID/HSD	8010, 8015, 8020

All Other Samples (1-3, 6-10, 12-14, 18, 19, 21, 22)

Samples were classified as solids, leached according to the protocol and the leachate analysed as follows:

Parameter	Method	SW 846 reference
Metals	acid digestion, ICP	6010
Arsenic, Selenium	acid digestion, hydride generation	7061, 7741
Mercury	acid digestion, cold vapour FAAS	7470, 7471
OC Pesticides, NCO's	extract, GC/ECD/FID	8040, 8080
Semivolatiles		8090, 8120
	confirmation by GC/MS	8250
Volatiles	purge & trap GC/MS	8240

A subset of samples was analysed for:

flash point	Penske Martens Tester	7.1
corrosivity	pH and steel coupon	7.2

Summary of TCLP results:

General Comments:

- The requirement to treat the liquid as the leachate means that virtually any waste oil will fail the test for metals.
- For several samples, particularly the oils and solvents, the routine analytical procedures employed did not meet the Regulation Limit (RL) for certain organic parameters. If, from previous testing, the waste was already classified as hazardous, additional work, which would have incurred additional costs, was not attempted.
- 2,4-Dinitrotoluene could not be analysed to the RL for several otherwise non hazardous samples. The regulation states for this compound that "the quantitation limit is greater than the RL. The quantitation limit therefore becomes the RL". Since no 2,4-DNT was detected at our quantitation limit, the wastes are classified as non hazardous on the basisof the analyses performed.

Sample #1: Sludge	non hazardous
Sample #2: Sludge	non hazardous
Sample #3: Sludge	non hazardous
Sample #4: Waste Oil	**chromium at 6 mg/L (repeat 9 mg/L) exceeds limit of 5 mg/L.**
Sample #5: Waste Oil	**lead at 41 mg/L exceeds limit of 5 mg/L cadmium at 3 mg/L exceeds limit of 1**
Sample #6: Sludge	non hazardous
Sample #7: Grease	non hazardous
Sample #8: Grease	non hazardous
Sample #9: Grease	non hazardous
Sample #10: Dust	non hazardous
Sample #11: Waste Lacquer Thinner	**fails flash point**
Sample #12: Sump North	non hazardous
Sample #13: Sump Central	non hazardous
Sample #14: Sump South	non hazardous
Sample #15: Naptha	**fails flash point**
Sample #16: Naptha	**fails flash point**
Sample #17: Naptha	**fails flash point**
Sample #18: Fly Ash	non hazardous
Sample #19: Yellow Dust	insufficient sample
Sample #20: Freon Solvent	**listed waste, CFR 40, part 261, p 430 class F001, chlorinated fluorocarbon**
Sample #21: Solid	non hazardous
Sample #22: Solid	non hazardous

ANALYTICAL RESULTS REPORT

CLIENT INFORMATION
Name: DELCO MORAINE NDH
Project:

LAB INFORMATION
Contact: MNS
Project: AN909149
Date: Sep.28 1990

Notes: "--" = Not Analysed
"<" = Less than MDL
RDL= Regulated Detection Limits

			GRIND SLUDGE				
			BLACK OIL	SOL OIL	SEMI SYN OIL	WASTE PLANT SLUDGE	EXXON 5185 WB GREASE
		Client ID:	SAMPLE #1	SAMPLE #2	SAMPLE #3	SAMPLE #6	SAMPLE #7
		Lab ID:	021252 90	021254 90	021256 90	021262 90	021264 90
Component	**RDL**	**Units**					
o-Cresol	200	mg/L	<	<	<	<	<
m-Cresol	200		<	<	<	<	<
p-Cresol	200		<	<	<	<	<
1,4-Dichlorobenzene	7.5		<	<	<	<	<
2,4-Dinitrotoluene	0.13		< 1	< 1	< 1	< 1	<
Nitrobenzene	2		<	<	<	<	<
Pentachlorophenol	100		<	<	<	<	<
2,4,5-Trichlorophenol	400		<	<	<	<	<
2,4,6-Trichlorophenol	2		<	<	<	<	<
Hexachlorobenzene	0.13		<	<	<	<	<
Hexachlorobutadiene	0.5		<	<	<	<	<
Hexachloroethane	3		<	<	<	<	<
Chlordane	0.03		<	<	<	<	<
Endrin	0.02		<	<	<	<	<
Heptachlor + Epoxide	0.008		<	<	<	<	<
Lindane	0.4		<	<	<	<	<
Methoxychlor	10		<	<	<	<	<
Toxaphene	0.5		<	<	<	<	<
SURROGATE RECOVERY		%					
4-Bromobiphenyl			69	74	78	77	56
Benzene	0.5	mg/L	<	<	<	<	<
2-Butanone	200		<	<	<	<	<
Carbon Tetrachloride	0.5		<	<	<	<	<
Chlorobenzene	100		<	<	<	<	<
Chloroform	6		<	<	<	<	<
1,2-Dichloroethane	0.5		<	<	<	<	<
1,1-Dichloroethene	0.7		<	<	<	<	<
Pyridine	5		<	<	<	<	<
Tetrachloroethene	0.5		<	<	<	<	<
Trichloroethene	0.5		<	<	<	<	<
Vinyl Chloride	0.2		<	<	<	<	<
SURROGATE RECOVERIES		%					
d4-1,2-Dichloroethane			97	99	91	91	100
d8-Toluene			110	120	110	120	110
1,4-Bromofluorobenzene			110	95	91	95	90

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ANALYTICAL RESULTS REPORT

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Project: AN909149
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			GRIND SLUDGE				
			BLACK OIL	SOL OIL	SEMI SYN.	WASTE PLANT SLUDGE	EXXON 5185WB GREASE 1
Client ID:			SAMPLE #1	SAMPLE #2	SAMPLE #3	SAMPLE #6	SAMPLE #7
Lab ID:			021252 90	021254 90	021256 90	021262 90	021264 90
Component	**RDL**	**Units**					
Ignitability			-	-	-	-	-
Corrosivity	0.01	mm/yr	–	–	–	–	–
Flash Point		°C	–	–	–	-	-
Arsenic	5	mg/L	<	<	<	< 0.5	< 0.5
Selenium	1		<	<	<	< 0.5	< 0.5
Mercury	0.02		<	<	<	<	<
Calcium		mg/L	0.5	2.7	26	330	1.8
Magnesium			0.93	0.85	0.77	0.9	0.17
Sodium			2.3	29	2.8	2.2	0.6
Potassium			< 0.5	0.7	2.5	0.7	< 0.5
Aluminum			0.046	0.091	0.16	0.34	< 0.03
Barium	100		0.049	0.041	0.062	0.12	0.037
Beryllium			< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
Boron			0.04	0.06	0.22	0.07	0.07
Cadmium	1		< 0.002	< 0.002	< 0.002	< 0.002	0.003
Chromium	5		0.24	0.061	0.12	< 0.004	< 0.004
Cobalt			< 0.1	< 0.1	0.02	< 0.1	< 0.1
Copper			<	0.016	0.024	0.024	< 0.006
Iron			220	37	120	1.9	0.08
Lead	5		< 0.02	0.023	< 0.02	< 0.02	< 0.02
Manganese			3.9	1	2.4	0.94	< 0.005
Molybdenum			< 0.02	< 0.02	< 0.02	0.029	< 0.02
Nickel			< 0.01	< 0.01	0.05	< 0.01	< 0.01
Phosphorus			<	0.08	0.42	0.22	< 0.06
Silicon			0.72	0.29	0.48	0.83	<.05
Silver	5		0.014	< 0.01	< 0.01	< 0.01	< 0.01
Strontium			0.003	0.02	0.031	0.12	0.00[illegible]
Sulphur			0.76	4.6	1.3	19	0.29
Thallium			< 0.06	< 0.06	< 0.06	< 0.06	< 0.06
Titanium			< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Vanadium			< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Zinc			0.029	0.025	0.22	0.051	0.29
Zirconium			< 0.01	< 0.01	< 0.01	< 0.01	< 0.01

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ANALYTICAL RESULTS REPORT

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			RYCON PREM HE GREASE 2	RYCON WA GREASE 3			
		Client ID:	SAMPLE #8	SAMPLE #9	#12 SUMP NORTH	#13 SUMP CENTRAL	#14 SUMP SOUTH TCLP
		Lab ID:	021266 90	021268 90	022488 90	022490 90	022492 90
Component	**RDL**	**Units**					
o-Cresol	200	mg/L	<	<	<	<	<
m-Cresol	200		<	<	<	<	<
p-Cresol	200		<	<	<	<	<
1,4-Dichlorobenzene	7.5		<	<	<	<	<
2,4-Dinitrotoluene	0.13		<	<	<1	<1	<1
Nitrobenzene	2		<	<	<	<	<
Pentachlorophenol	100		<	<	<	<	<
2,4,5-Trichlorophenol	400		<	<	<	<	<
2,4,6-Trichlorophenol	2		<	<	<	<	<
Hexachlorobenzene	0.13		<	<	<	<	<
Hexachlorobutadiene	0.5		<	<	<	<	<
Hexachloroethane	3		<	<	<	<	<
Chlordane	0.03		<	<	<	<	<
Endrin	0.02		<	<	<	<	<
Heptachlor + Epoxide	0.008		<	<	<	<	<
Lindane	0.4		<	<	<	<	<
Methoxychlor	10		<	<	<	<	<
Toxaphene	0.5		<	<	<	<	<
SURROGATE RECOVERY		%					
4-Bromobiphenyl			69	58	61	77	79
Benzene	0.5	mg/L	<	<	<	<	<
2-Butanone	200		<	<	<	<	<
Carbon Tetrachloride	0.5		<	<	<	<	<
Chlorobenzene	100		<	<	<	<	<
Chloroform	6		<	<	<	<	<
1,2-Dichloroethane	0.5		<	<	<	<	<
1,1-Dichloroethene	0.7		<	<	<	<	<
Pyridine	5		<	<	<	<	<
Tetrachloroethene	0.5		<	<	<	<	<
Trichloroethene	0.5		<	<	<	<	<
Vinyl Chloride	0.2		<	<	<	<	<
SURROGATE RECOVERIES		%					
d4-1,2-Dichloroethane			100	96	100	100	99
d8-Toluene			100	75	120	110	120
1,4-Bromofluorobenzene			110	100	86	100	97

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ANALYTICAL RESULTS REPORT

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Project: AN909149
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Component	RDL	Units	RYCON PREM HE GREASE 2	RYCON WA GREASE 3	#12 SUMP NORTH	#13 SUMP CENTRAL	#14 SUMP SOUTH TCLP
Client ID:			SAMPLE #8	SAMPLE #9			
Lab ID:			021266 90	021268 90	022488 90	022490 90	022492 90
Ignitability			-	-	Does not ignite	-	-
Corrosivity	0.01	mm/yr	–	–	<	<	<
Flash Point		°C	-	-	-	>61	>61
Arsenic	5	mg/L	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
Selenium	1		< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
Mercury	0.02		<	<	< 0.0002	< 0.0002	< 0.0002
Calcium		mg/L	0.57	0.59	300	250	430
Magnesium			0.13	0.13	12	17	14
Sodium			0.9	0.8	78	160	91
Potassium			< 0.5	< 0.5	4.6	11	8
Aluminum			< 0.03	< 0.03	1.1	3.3	0.96
Barium	100		0.035	0.036	1.1	1.9	0.55
Beryllium			< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
Boron			0.02	0.02	0.36	0.64	1.2
Cadmium	1		< 0.002	< 0.002	0.037	0.02	0.043
Chromium	5		< 0.004	< 0.004	0.03	0.11	0.038
Cobalt			< 0.1	< 0.1	0.03	0.1	< 0.1
Copper			< 0.006	< 0.006	0.045	< 0.006	0.22
Iron			0.02	0.02	23	23	7.9
Lead	5		< 0.02	< 0.02	0.029	0.032	0.034
Manganese			< 0.005	< 0.005	1.2	2	1.1
Molybdenum			< 0.02	< 0.02	< 0.02	0.027	< 0.02
Nickel			< 0.01	< 0.01	0.041	0.058	0.034
Phosphorus			< 0.06	< 0.06	21	72	36
Silicon			<.05	<.05	9.5	76	26
Silver	5		< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Strontium			0.003	0.004	0.65	1.5	0.78
Sulphur			0.17	0.19	7.1	17	12
Thallium			< 0.06	< 0.06	< 0.06	< 0.06	< 0.06
Titanium			< 0.01	< 0.01	< 0.01	0.026	0.013
Vanadium			< 0.005	< 0.005	< 0.005	< 0.005	0.006
Zinc			0.29	0.29	7.3	9.3	7.1
Zirconium			< 0.01	< 0.01	< 0.01	0.012	< 0.01

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ANALYTICAL RESULTS REPORT

CLIENT INFORMATION
Name: DELCO MORAINE NDH
Project:

LAB INFORMATION
Contact: MNS
Project: AN909149
Date: Oct.01 1990

Notes: "-" = Not Analysed
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"*NA"= Not Suffician Sample
RL = Regulated Limit

			Client ID: SAMPLE #10	SAMPLE #18	SAMPLE #19
			Lab ID: 021270 90	021280 90	021282 90
o-Cresol	200	mg/L	–	–	*NA
m-Cresol	200		–	–	*NA
p-Cresol	200		–	–	*NA
1,4-Dichlorobenzene	7.5		–	–	*NA
2,4-Dinitrotoluene	0.13		–	–	*NA
Nitrobenzene	2		–	–	*NA
Pentachlorophenol	100		–	–	*NA
2,4,5-Trichlorophenol	400		–	–	*NA
2,4,6-Trichlorophenol	2		–	–	*NA
Hexachlorobenzene	0.13		–	–	*NA
Hexachlorobutadiene	0.5		–	–	*NA
Hexachloroethane	3		–	–	*NA
Chlordane	0.03		–	–	*NA
Endrin	0.02		–	–	*NA
Heptachlor + Epoxide	0.008		–	–	*NA
Lindane	0.4		–	–	*NA
Methoxychlor	10		–	–	*NA
Toxaphene	0.5		–	–	*NA
SURROGATE RECOVERIES		%			
4-Bromobiphenyl			–	–	*NA
Benzene	0.5	mg/L	–	–	*NA
2-Butanone	200		–	–	*NA
Carbon Tetrachloride	0.5		–	–	*NA
Chlorobenzene	100		–	–	*NA
Chloroform	6		–	–	*NA
1,2-Dichloroethane	0.5		–	–	*NA
1,1-Dichloroethene	0.7		–	–	*NA
Pyridine	5		–	–	*NA
Tetrachloroethene	0.5		–	–	*NA
Trichloroethene	0.5		–	–	*NA
Vinyl Chloride	0.2		–	–	*NA
SURROGATE RECOVERIES		%			
d4-1,2-Dichloroethane			–	–	*NA
d8-Toluene			–	–	*NA
1,4-Bromofluorobenzene			–	–	*NA

ANALYTICAL RESULTS REPORT

CLIENT INFORMATION
Name: DELCO MORAINE NDH
Project:

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Project: AN909149
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			GREASE CHEVRON	GREASE FORD
		Client ID:	SAMPLE #21	SAMPLE #22
		Lab ID:	021286 90	021288 90
Component	**RDL**	**Units**		
o-Cresol	200	mg/L	<	<
m-Cresol	200		<	<
p-Cresol	200		<	<
1,4-Dichlorobenzene	7.5		<	<
2,4-Dinitrotoluene	0.13		<	<
Nitrobenzene	2		<	<
Pentachlorophenol	100		<	<
2,4,5-Trichlorophenol	400		<	<
2,4,6-Trichlorophenol	2		<	<
Hexachlorobenzene	0.13		<	<
Hexachlorobutadiene	0.5		<	<
Hexachloroethane	3		<	<
Chlordane	0.03		<	<
Endrin	0.02		<	<
Heptachlor + Epoxide	0.008		<	<
Lindane	0.4		<	<
Methoxychlor	10		<	<
Toxaphene	0.5		<	<
SURROGATE RECOVERY		%		
4-Bromobiphenyl			79	61
Benzene	0.5	mg/L	<	<
2-Butanone	200		<	<
Carbon Tetrachloride	0.5		<	<
Chlorobenzene	100		<	<
Chloroform	6		<	<
1,2-Dichloroethane	0.5		<	<
1,1-Dichloroethene	0.7		<	<
Pyridine	5		<	<
Tetrachloroethene	0.5		<	<
Trichloroethene	0.5		<	<
Vinyl Chloride	0.2		<	<
SURROGATE RECOVERIES		%		
d4-1,2-Dichloroethane			100	99
d8-Toluene			81	110
1,4-Bromofluorobenzene			96	110

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			GREASE CHEVRON	GREASE FORD
		Client ID:	SAMPLE #21	SAMPLE #22
		Lab ID:	021286 90	021288 90
Component	**RDL**	**Units**		
Ignitability			-	-
Corrosivity	0.01	mm/yr	–	–
Flash Point		°C	-	-
Arsenic	5	mg/L	< 0.5	< 0.5
Selenium	1		< 0.5	< 0.5
Mercury	0.02		<	< 0.0002
Calcium		mg/L	0.65	0.53
Magnesium			0.27	0.11
Sodium			0.5	0.5
Potassium			< 0.5	< 0.5
Aluminum			< 0.03	< 0.03
Barium	100		0.037	0.034
Beryllium			< 0.001	< 0.001
Boron			0.02	< 0.01
Cadmium	1		< 0.002	0.003
Chromium	5		< 0.004	< 0.004
Cobalt			< 0.1	< 0.1
Copper			< 0.006	< 0.006
Iron			0.02	< 0.01
Lead	5		< 0.02	0.059
Manganese			< 0.005	< 0.005
Molybdenum			< 0.02	< 0.02
Nickel			< 0.01	< 0.01
Phosphorus			< 0.06	< 0.06
Silicon			<.05	<.05
Silver	5		< 0.01	< 0.01
Strontium			0.004	0.003
Sulphur			0.17	0.18
Thallium			< 0.06	< 0.06
Titanium			< 0.01	< 0.01
Vanadium			< 0.005	< 0.005
Zinc			2.8	< 0.005
Zirconium			< 0.01	< 0.01

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ANALYTICAL RESULTS REPORT

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Oil Samples

Notes: "-" = Not Analysed
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RL= Regulated Limits
NA = Data not available;
Freon solvent not compatible with requested analysis

Component	RL	Units	SAMPLE #4	SAMPLE #5	SAMPLE #11	SAMPLE #15	SAMPLE #16	SAMPLE #17
Lab ID:			021258 90	021260 90	021272 90	021274 90	021276 90	021278 90
Flash Point		∞C	84	140	38	45	50	39
Arsenic		mg/kg	< 5	<1.3	–	–	–	–
Selenium			<1	<1.3	–	–	–	–
Mercury			<0.1	<0.1	–	–	–	–
Calcium		mg/kg	400	500	–	–	–	–
Magnesium			44	1300	–	–	–	–
Sodium			150	460	–	–	–	–
Potassium			<100	< 100	–	–	–	–
Aluminum			240	< 30	–	–	–	–
Barium			5.9	2.5	–	–	–	–
Beryllium			< 0.1	< 0.1	–	–	–	–
Boron			< 10	30	–	–	–	–
Cadmium			0.5	3.0	–	–	–	–
Chromium			6.0*	< 5	–	–	–	–
Cobalt			< 5	< 5	–	–	–	–
Copper			13	10	–	–	–	–
Iron			770	160	–	–	–	–
Lead			< 10	41	–	–	–	–
Manganese			7	< 5	–	–	–	–
Molybdenum			< 5	25	–	–	–	–
Nickel			< 5	< 5	–	–	–	–
Phosphorus			210	1300	–	–	–	–
Silicon			150	79	–	–	–	–
Silver			< 5	< 5	–	–	–	–
Strontium			1.4	0.2	–	–	–	–
Sulphur			4600	4300	–	–	–	–
Thallium			< 20	< 20	–	–	–	–
Titanium			< 5	< 5	–	–	–	–
Vanadium			< 10	< 10	–	–	–	–
Zinc			32	1400	–	–	–	–
Zirconium			< 5	< 5	–	–	–	–

* Repeat by Parr bomb digestion showed Cr at 9.5 mg/kg

ANALYTICAL RESULTS REPORT

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Project: AN909149
Date: Oct.01 1990

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RL = Regulated Limit

Component	RL	Units	FLY ASH		
Client ID:			SAMPLE #10	SAMPLE #18	SAMPLE #19
Lab ID:			021270 90	021280 90	021282 90
Reactivity			UNREACTIVE	–	–
Ignitability			DID NOT IGNITE	–	*NA
Arsenic	5	mg/L	< 0.5	< 0.5	< 0.5
Selenium	1	mg/L	< 0.5	< 0.5	< 0.5
Mercury	0.2	mg/L	<	<	<
Calcium		mg/L	8.4	49	3.7
Magnesium			2.6	2.9	0.55
Sodium			14	2.6	2.5
Potassium			< 0.5	5.5	< 0.5
Aluminum			0.042	1.8	0.055
Barium	100		0.054	0.7	0.13
Beryllium			< 0.001	0.006	< 0.001
Boron			0.14	0.76	1.0
Cadmium	1		< 0.002	0.004	< 0.002
Chromium	5		< 0.004	< 0.004	< 0.004
Cobalt			< 0.01	0.16	< 0.01
Copper			0.014	0.36	0.007
Iron			2.4	0.23	0.08
Lead	5		0.046	0.24	< 0.02
Manganese			0.19	0.052	0.007
Molybdenum			< 0.02	0.027	< 0.02
Nickel			< 0.02	0.17	< 0.02
Phosphorus			0.56	0.25	< 0.06
Silicon			0.49	1.0	< 0.05
Silver	5		< 0.01	< 0.01	< 0.01
Strontium			0.016	2.1	0.013
Sulphur			0.93	46	1.3
Thallium			< 0.06	< 0.06	< 0.06
Titanium			< 0.01	0.015	< 0.01
Vanadium			< 0.005	0.052	< 0.005
Zinc			0.043	0.6	0.066
Zirconium			< 0.1	< 0.1	< 0.1
Corrosivity	0.01	mm/yr	–	–	<

ANALYTICAL RESULTS REPORT

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Name: DELCO MORAINE NDH
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Project: AN909149
Date: Sep.28 1990

Oil Samples

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RL= Regulated Limits
NA = Data not available;
Freon solvent not compatible with requested analysis

						NAPTHA	NAPTHA	NAPTHA
		Client ID:	SAMPLE #4	SAMPLE #5	SAMPLE #11	SAMPLE #15	SAMPLE #16	SAMPLE #17
		Lab ID:	021258 90	021260 90	021272 90	021274 90	021276 90	021278 90
Component	**RL**	**Units**						
Arsenic	5	mg/L	–	–	–	< 0.5	< 0.5	< 0.5
Selenium	1		–	–	–	< 0.5	< 0.5	< 0.5
Mercury	0.2		–	–	–	< 0.002	< 0.002	< 0.002
Calcium		mg/L	–	–	–	3.5	6.4	3.2
Magnesium			–	–	–	<1.25	<1.25	<1.25
Sodium			–	–	–	<2.5	<2.5	<2.5
Potassium			–	–	–	<12.5	<12.5	<12.5
Aluminum			–	–	–	<0.75	<0.75	<0.75
Barium	100		–	–	–	<0.05	0.35	<0.05
Beryllium			–	–	–	<0.03	<0.03	<0.03
Boron			–	–	–	<0.25	<0.25	<0.25
Cadmium	1		–	–	–	<0.05	0.083	0.083
Chromium	5		–	–	–	<0.1	0.13	0.053
Cobalt			–	–	–	<0.25	<0.25	<0.25
Copper			–	–	–	0.19	1.5	<0.15
Iron			–	–	–	2.1	16	0.46
Lead	5		–	–	–	1.0	1.2	<0.5
Manganese			–	–	–	<0.13	0.3	<0.13
Molybdenum			–	–	–	<0.5	<0.5	<0.5
Nickel			–	–	–	<0.5	<0.5	<0.5
Phosphorus			–	–	–	<1.5	<1.5	<1.5
Silicon			–	–	–	3.2	3.5	3.3
Silver	5		–	–	–	<0.25	<0.25	<0.25
Strontium			–	–	–	<0.03	0.038	<0.03
Sulphur			–	–	–	<2	7.6	<2
Thallium			–	–	–	<1.5	<1.5	<1.5
Titanium			–	–	–	<0.25	<0.25	<0.25
Vanadium			–	–	–	<0.13	<0.13	<0.13
Zinc			–	–	–	<0.13	1.1	<0.13
Zirconium			–	–	–	<0.25	<0.25	<0.25

ANALYTICAL RESULTS REPORT

CLIENT INFORMATION
Name: DELCO MORAINE NDH
Project:

LAB INFORMATION
Contact: MNS
Project: AN909149
Date: Sep.28 1990

Notes: "-" = Not Analysed
"<" = Less than MDL
RL= Regulated Limits
NA = Data not available;
Freon solvent not compatible with requested analysis

Oil Samples

					F005 LAQUER THINNER	NAPTHA	NAPTHA	NAPTHA
			Client ID:	SAMPLE #4	SAMPLE #5	SAMPLE #11	SAMPLE #15	SAMPLE #16	SAMPLE #17
			Lab ID:	021258 90	021260 90	021272 90	021274 90	021276 90	021278 90
Component	**RL**	**Units**							
o-Cresol	200	mg/L		<	<	<	<	<	<
m-Cresol	200			<	<	<	<	<	<
p-Cresol	200			<	<	<	<	<	<
1,4-Dichlorobenzene	7.5			<	<	<	<	<	<
2,4-Dinitrotoluene	0.13			<	<	**<100**	**<100**	**<100**	**<100**
Nitrobenzene	2			< 100	<	<	<	<	<
Pentachlorophenol	100			< 100	<	<	<	<	<
2,4,5-Trichlorophenol	400			< 200	<	<	<	<	<
2,4,6-Trichlorophenol	2			< 200	<	<	<	<	<
Hexachlorobenzene	0.13			< 200	<	<	<	<	<
Hexachlorobutadiene	0.5			<	<	<	<	<	<
Hexachloroethane	3			<	<	<	<	<	<
Chlordane	0.03			<	<	<	<	<	<
Endrin	0.02			<	<	<	<	<	<
Heptachlor + Epoxide	0.008			<	<	<	<	<	<
Lindane	0.4			<	<	<	<	<	<
Methoxychlor	10			<	<	<	<	<	<
Toxaphene	0.5			<	<	<	<	<	<
Benzene	0.5	mg/L		<	<	<	<	<	<
2-Butanone	200			<	<	<	<	<	<
Carbon Tetrachloride	0.5			<	<	<	<	<	<
Chlorobenzene	100			<	<	<	<	<	<
Chloroform	6			<	<	<	<	<	<
1,2-Dichloroethane	0.5			< 50	<	<	<	<	<
1,1-Dichloroethene	0.7			< 50	<	<	<	<	<
Pyridine	5			< 50	<	<	<	<	<
Tetrachloroethene	0.5			<	<	<	<	<	<
Trichloroethene	0.5			<	<	<	<	<	<
Vinyl Chloride	0.2			<	<	<	<	<	<

ANALYTICAL RESULTS REPORT

CLIENT INFORMATION
Name: DELCO MORAINE NDH
Project:

LAB INFORMATION
Contact: MNS
Project: AN909149
Date: Sep.28 1990

FREON

Notes: "–" = Not Analysed
"<" = Less than MDL
RL= Regulated Limits
NA = Data not available;
Freon solvent not compatible with requested analysis

Client ID: SAMPLE #20
Lab ID: 021284 90

Component	RL	Units	
Flash Point		∞C	<6
Arsenic		mg/kg	–
Selenium			–
Mercury			–
Calcium		mg/kg	–
Magnesium			–
Sodium			–
Potassium			–
Aluminum			–
Barium			–
Beryllium			–
Boron			–
Cadmium			–
Chromium			–
Cobalt			–
Copper			–
Iron			–
Lead			–
Manganese			–
Molybdenum			–
Nickel			–
Phosphorus			–
Silicon			–
Silver			–
Strontium			–
Sulphur			–
Thallium			–
Titanium			–
Vanadium			–
Zinc			–
Zirconium			–

* Repeat by Parr bomb digestion showed Cr at 9.5 mg/kg

ANALYTICAL RESULTS REPORT

CLIENT INFORMATION
Name: DELCO MORAINE NDH
Project:

LAB INFORMATION
Contact: MNS
Project: AN909149
Date: Sep.28 1990

Notes: "-" = Not Analyzed
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RL= Regulated Limits
NA = Data not available;
Freon solvent not compatible with requested analysis

Client ID: SAMPLE #20
Lab ID: 021284 90

Component	RL	Units	
Arsenic	5	mg/L	–
Selenium	1		–
Mercury	0.2		–
Calcium		mg/L	–
Magnesium			–
Sodium			–
Potassium			–
Aluminum			–
Barium	100		–
Beryllium			–
Boron			–
Cadmium	1		–
Chromium	5		–
Cobalt			–
Copper			–
Iron			–
Lead	5		–
Manganese			–
Molybdenum			–
Nickel			–
Phosphorus			–
Silicon			–
Silver	5		–
Strontium			–
Sulphur			–
Thallium			–
Titanium			–
Vanadium			–
Zinc			–
Zirconium			–

ANALYTICAL RESULTS REPORT

CLIENT INFORMATION
Name: DELCO MORAINE NDH
Project:

LAB INFORMATION
Contact: MNS
Project: AN909149
Date: Sep.28 1990

FREON

Notes: "-" = Not Analyzed
"<" = Less than MDL
RL= Regulated Limits
NA = Data not available;
Freon solvent not compatible with requested analysis

Client ID: SAMPLE #20
Lab ID: 021284 90

Component	RL	Units	
o-Cresol	200	mg/L	<
m-Cresol	200		<
p-Cresol	200		<
1,4-Dichlorobenzene	7.5		<
2,4-Dinitrotoluene	0.13		<
Nitrobenzene	2		<
Pentachlorophenol	100		<
2,4,5-Trichlorophenol	400		<
2,4,6-Trichlorophenol	2		<
Hexachlorobenzene	0.13		<
Hexachlorobutadiene	0.5		<
Hexachloroethane	3		<
Chlordane	0.03		<
Endrin	0.02		<
Heptachlor + Epoxide	0.008		<
Lindane	0.4		<
Methoxychlor	10		<
Toxaphene	0.5		<

Benzene	0.5	mg/L	<
2-Butanone	200		<
Carbon Tetrachloride	0.5		NA
Chlorobenzene	100		<
Chloroform	6		NA
1,2-Dichloroethane	0.5		NA
1,1-Dichloroethene	0.7		NA
Pyridine	5		<
Tetrachloroethene	0.5		NA
Trichloroethene	0.5		NA
Vinyl Chloride	0.2		NA

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: GMC New Departure Hyatt

USEPA I.D.: OHD 001 550 442 HWFB No.:

Street: 2509 Hayes Ave.

City: Sandusky State: OH Zip: 44870

County: Erie Telphone: 419-627-7076

PUCO No.:

Owner/Operator:

Street:

City: State: Zip:

Telephone:

Inspection Date: 11 / 21 / 91 Time: 10:30 - 3:30

Advance notice of inspection given? (yes) ✓ (no) ____
If so, how far in advance? 1- week

	Name	Agency/Title	Phone
Inspectors:	M.L. Porter	OEPA ES2	419-352-8461
	P.L. Williams	OEPA ES2	419-352-8461
Facility Representative:	Robert Hare	GMC NDH Sr. Environmental Engineer	419-627-7076
	John Brent	GMC NDH Sr. Facilities Engineer	419-627-7084

STATUS

Cond. Ex. SQG___ SQG___ Large Quantity Generator ✓
Treatment___ Storage ✓ Disposal___ Transporter___

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

ACTIVITIES

Containers ✓
Tanks___
Wastepile___
Landfill___
Surface Impoundment___

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

Revised: 1/7/91

FACILITY INSPECTION
WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE						ON SITE MANAGEMENT								OFF SITE MANAGEMENT	
EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR: LESS THAN 90 DAYS	GENERATOR: LESS THAN 180 DAYS	GENERATOR: LESS THAN 270 DAYS	TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLED	CONTAINER	IMPOUNDMENT	TANK	WASTE PILE	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT	DISPOSAL FACILITY
D-001	150 Dr. / YEAR	(Solvent B) Petroleum Naptha				X									Environmental Waste Control, Inc. Inkster, Mi.
F-001	5 Dr / yr	Freon solvents chlorinated fluorocarbon cleaning air bearings				X								Note: Freon solvents are being eliminated from H.W. waste stream	"
F005	8 Dr / yr	Paint thinners Mek - Toluene				X									"
D001	2 Dr / yr	Paint thinners Mineral spirits				X									"
D-007	Irreg. Vol.	Chrome Sludge													

GMC New Departure Hyatt
Large Quantity Generator
Storage Facility

Produces automotive bearings; metal machining & finishing lines are operated.
Parts cleaning and chrome plating are performed.

Petroleum Naptha (D001) used to clean parts

Freon (F001) is used in the model shop where special ~~exp~~ bearings are manufactured.

Mineral Spirits (D001) used to clean paint guns, brushes and other painting equipment
Paint Thinner (F005)

Chromium (D007) is reclaimed from plating line in an enclosed system
Occasionally chromium bath and sludge may need to be discarded if a batch goes bad
This concentrated chromium can't go to the reclamation unit.

A maximum of (56) 55 gallon drums can be stored (≤90 days) in the waste storage building which is equipped w/ 6" curb.

Wastes are sent to Environmental Waste Control, Inc.

TSD facility has submitted a closure plan to close as a TSD and convert to a 90 day LQG

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

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

* Have submitted a closure plan for greater than 90 day storage

Do analysis on [illegible] from chrome plating filters & in paint booth

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

REMARKS - WASTE ANALYSIS REQUIREMENTS

Y/N/NA RMK #

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

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

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

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

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

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

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

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days? NA ____

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

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

Y/N/NA RMK #

WASTE EVALUATION (OAC 3745-52-11)

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A)(B) and (C)? N ____

   If not, specify those waste streams which the generator has failed to adequately evaluate:

   The facility failed to analyze properly:

   Spent Nickel catalyst;
   Waste Ink;
   Waste solvent;
   Dust filter sand
   chrome plating filters.

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04? N ____

   If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

3. Is the facility generating any wastes which are identified as <u>recyclable materials</u> as defined in OAC 3745-51-06? N ____

   If so, please identify these waste streams below:

	Y/N/NA	RMK #

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

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

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

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:
oily waste water treatment (includes elementary neutralization unit.)

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

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

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

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

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

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

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)	Y/N/NA	RMK #
10. Does the generator meet the following pre-transport requirements prior to offering hazardous wastes for transport off-site:		
a. The waste material is packaged, labeled, and marked in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32]?	Y	
b. Each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32?	Y	#1
c. The generator meets the requirements for proper DOT placarding <u>or</u> offers the appropriate DOT placards to the initial transporter in compliance with 3745-52-33?	Y	

REMARKS - PRETRANSPORT REQUIREMENTS

#1 Some labels do not include EPA hazardous waste codes.

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

REMARKS - GENERAL INSPECTION REQUIREMENTS

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

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

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

REMARKS - SECURITY REQUIREMENTS

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

REMARKS - MANIFEST REQUIREMENTS

Y/N/NA RMK #

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

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

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

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

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

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

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

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

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

#1 a container of chrome plating filters was not labeled with the words "Hazardous Waste". corrected date of inspection

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

#1 Did not perform weekly inspections on the spill cart; facility revised inspection log to include inspection & submitted copy completed for following week 11/29/91

Y/N/NA RMK #

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

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

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

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

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

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

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

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

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

   e. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers? SENT copy with correct — Y

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

   g. Records of any waste analyses and trial tests required to be performed? — N/A

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

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

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

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

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

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

REMARKS - OPERATING RECORD REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)	Y/N/NA	RMK #
1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A)(4)]	y	
2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A)(4)]	y	
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A)(4)]	y	
4. Does the generator keep all the records required by 3745-65-16(D)(E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)]	y	

REMARKS - PERSONNEL TRAINING REQUIREMENTS

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE WASTES (OAC 3745-65-17)	Y/N/NA	RMK #
1. If ignitable, reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17]		
a. Wastes are protected from sources of ignition and/or reaction?	Y	
b. Physical separation of incompatible waste materials?	Y	
c. "No Smoking" or "No Open Flames" signs are placed near areas where ignitable or reactive wastes are handled?	Y	
d. Commingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B)?	NA	

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

TOXICITY CHARACTERISTIC (TC) RULE REQUIREMENTS

	Y/N	N/A	RMK#
WASTE EVALUATION (GENERATOR REQUIREMENT)			
1. Has the generator evaluated all wastes to determine if they exhibit any of the toxicity characteristics as defined in 40 CFR 262.24? [40 CFR 262.11]	Y		
(a) Did the generator use knowledge of the process to determine if wastes exhibit any of the toxicity (TC) characteristics? OR;	N		
(b) Did the generator obtain a chemical analysis of the wastes to determine if the wastes demonstrate any of the toxicity (TC) characteristics?	Y		

NOTE: If the generator has obtained a chemical TC analysis of the wastes, please attach a copy of the analytical results to this checklist.

2. Please identify which of the following TC wastes are being managed at the facility:

TC METAL WASTES

___ D004 (Arsenic)
___ D005 (Barium)
___ D006 (Cadmium)
✓ D007 (Chromium)
___ D008 (Lead)
___ D009 (Mercury)
___ D010 (Selenium)
___ D011 (Silver)

TC PESTICIDE WASTES

___ D012 (Endrin)
___ D013 (Lindane)
___ D014 (Methoxychlor)
___ D015 (Toxaphene)
___ D016 (2,4-D)
___ D017 (2,4,5-TP)

TC ORGANIC WASTES

___ D018 (Benzene)
___ D019 (Carbon tetrachloride)
___ D020 (Chlordane)
___ D021 (Chlorobenzene)
___ D022 (Chloroform)
___ D023 (o-Cresol)
___ D024 (m-Cresol)
___ D025 (p-Cresol)
___ D026 (Cresol)
___ D027 (1,4-Dichlorobenzene)
___ D028 (1,2-Dichloroethane)
___ D030 (2,4-Dinitrotoluene)
___ D031 (Heptachlor)
___ D032 (Hexachlorobenzene)
___ D033 (Hexachlorobutadiene)
___ D034 (Hexachloroethane)
___ D035 (Methyl ethyl ketone)
___ D036 (Nitrobenzene)
___ D037 (Pentrachlorophenol)
___ D038 (Pyridine)
___ D039 (Tetrachloroethylene)
___ D040 (Trichloroethylene)
___ D041 (2,4,5-Trichlorophenol)
___ D042 (2,4,6-Trichlorophenol)
___ D043 (Vinyl chloride)

Filters from chrome plating operation were stored in an open satellite accumulation drum with no hazardous waste label or words identifying the contents of the container. On the date of inspection, New Depart corrected this violation

Please identify below, how the facility is managing TC hazardous wastes:

GENERATOR ACCUMULATION (< 90 DAYS)	STORAGE (> 90 DAYS)	ON-SITE TREATMENT	ON-SITE DISPOSAL
✓ Container	✓ Container	___ Tank	___ Injection Well
___ Tank	___ Tank	___ Incinerator	___ Surface Impoundment
	___ Waste Pile	___ Other	___ Land Application
	___ Surface Impoundment		

	Y/N	N/A	RMK#
PART A APPLICATION REQUIREMENTS			
4. For TSD facilities: Does the company have available, a copy of its Part A permit application which has been revised to reflect TC waste codes?	___		___
If so, please obtain a copy and attach to this checklist.			
5. If the company does not have a revised Part A available, does the facility representative indicate that a revised Part A application has been filed with U.S. EPA?	___		___
RECORDKEEPING REQUIREMENTS			
6. Is the owner/operator in compliance with the 40 CFR Part 264 and Part 265 recordkeeping requirements applicable to the management of TC waste?	___		___

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

	Y/N	N/A	RMK#
STRUCTURAL/OPERATING REQUIREMENTS			
7. Is (are) the unit(s) used to manage TC hazardous waste in compilance with the structural and operating requirements of 40 CFR Part 264 and Part 265?	____		____

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

	Y/N	N/A	RMK#
OPERATION/MAINTENANCE REQUIREMENTS			
8. Is the owner/operator complying with 40 CFR Part 264 and Part 265 operation and maintenance requirements to ensure the proper management of TC hazardous wastes?	____		____

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

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

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

#1 Drum of chrome plating filters was open.

#2 No ~~[illegible]~~ Time of inspections connected

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

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

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

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

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

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

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

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

3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)] n #1 June 5, 198

4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] n #1

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

#1 The contingency plan was undergoing revision at the time of the inspection. The present plan appeared to be adequate, however a complete review of the contingency plan will be conducted of the revised copy

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

REMARKS - CONTINGENCY PLAN REQUIREMENTS

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

Y/N/NA RMK#

CASE-BY-CASE EXTENSIONS

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

   (a) List the waste(s) affected:

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

   (c) When does the extension expire? _____

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

VARIANCE FROM A TREATMENT STANDARD

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

   (a) List the waste(s) affected:

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

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

Y/N/NA RMK#

NO MIGRATION PETITION

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

(a) List the waste(s) affected:

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

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

PROHIBITION AGAINST DILUTION

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

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

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

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

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

NOTE: Dilution of wastes is permissible under the following conditions:

i. The entity dilutes a characteristic only hazardous waste in a wastewater treatment system which treats wastes subsequently discharged pursuant to a permit issued under section 402 of Clean Water Act or which treats wastes for purposes of pretreatment under section 307 of the Clean Water Act; and,

ii. No other method of treatment has been specified as the treatment standard for the waste. (See 40 CFR 268.3)

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(C)(3) (40 CFR 261.8(e)(1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS	Y/N/NA	RMK#
1. Has the generator adequately evaluated all wastes generated to determine if the wastes are restricted from land disposal under O.A.C. Chapter 3745-59 (40 CFR Part 268)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
(a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
(b) For determinations based upon analytical testing of the waste: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)?	Y	
3. Has the generator determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	

REMARKS

	Y/N/NA	RMK#
4. Does the generator generate waste mixtures that are subject to two or more different treatment standards? If so,	Y	
(a) **For mixed waste streams containing two or more concentration based treatment standards:** Has the generator applied the more stringent treatment standard as the treatment standard for the mixture? [O.A.C. Rules 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]	Y	
5. Does the facility generate any listed waste(s) which are restricted from land disposal? If so,	Y	
(a) Do such wastes also exhibit hazardous waste characteristics as identified in 40 CFR 262.11?	Y	
(b) For listed wastes which also exhibit characteristic(s), does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [40 CFR 268.9]	N	#1

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

6. Does the generator treat any characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous? If so,	Y	
(a) Are treated waste(s) sent to a licensed solid waste disposal facility? If so,	Y	
i. With each shipment of waste, does the generator submit a notification and certification to the Regional Administrator which contains the following information:		
a. Name and address of the solid waste facility receiving the waste? [40 CFR 268.9(d)(1)(i)]	Y	
b. A description of the waste as initially generated, including EPA hazardous waste numbers and the treatability group? [40 CFR 268.9(d)(1)(ii)]	Y	
c. The treatment standards applicable at the initial point of generation? [40 CFR 268.9(d)(1)(iii)]	Y	
ii. Is the certification signed by an authorized representative and does it contain the language in 40 CFR 268.7(b)(5)(i)? [40 CFR 268.9(d)(2)]	Y	

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

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

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

REMARKS

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

	Y/N/NA	RMK#
1. Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(a) (40 CFR 268.50(a)(2)(i)):	Y	
(a) The identification of the contents?	Y	
(b) With the date which accumulation began?	Y	
2. Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(b) (40 CFR 268.50(a)(2)(ii)):	N	
(a) A description of its contents?	NA	
(b) The quantity of each hazardous waste received?		
(c) The date each period of accumulation begins? or;		
(d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A)(2)(b); 40 CFR 268.50(a)(2)(ii)]		
3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,	N	
(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1); 40 CFR 268.50(a)(1)]	NA	

NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B); 40 CFR 268.50(b)] During the first year of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

	Y/N/NA	RMK#
4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days? If so,	Y(?)	#1
(a) Does the facility meet the requirements of 40 CFR 761.65(b)? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]	Y	
(b) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]	—	#1

REMARKS

Facility was storing 70 floorescent lamp fixture ballast. in the Hazardous Waste Storage Building. The facility was uncertain if the ballast actually contained any PCB and was in the process of analyzing them.

HEADER INFORMATION - PERMIT/CLOSURE TRACKING

NEW ENTRY ONLY

FACILITY NAME GMC - New Departure/Hyatt FACILITY I.D. # OHD 001 880442

HEADER TYPE: (Circle one)
(C2001)

(P) = permit, includes FMP process
M = permit modification
W = post-closure permit
R = research & development
C = closure (for LDF-clean closure only)
L = post-closure activities

HEADER PROCESS TYPE: (Circle one)
(C2003)

(S) = storage, treatment
I = incineration
D = disposal

HEADER PROCESS INDICATOR: (Circle one)
(C2051)

(R) = requested (Call-in)
S = submitted
C = covered (permit issued or closure plan approved)

Date covered (C2004)

* PROCESS CODE (C2052)	* PROCESS AMT. (C2053)	* PROCESS UNITS (C2054)
S01	2,200	G

* See key on reverse side.

o ACTION EVENT (CODE)	RESP. AGENCY	RESP. PERSON	DUE DATE	ACTUAL DATE	o STATUS CODE
01	E	DAH		4-22-88	
02	E	DAH	10-25-88		

o See appropriate portion of Permit Issuance Tracking document for applicable codes.

Revised 2/3/88

4/29/88 CB

DEC 3 1990

5HR-12

Mr. Robert W. Hare
Delco Moraine New Departure Hyatt
2509 Hayes Avenue
Sandusky, Ohio 44870

Re: Compliance Letter
Delco Moraine Departure Hyatt
OHD 001 880 442

Dear Mr. Hare:

On June 15, 1990, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of Chapter 3734 of the Ohio Revised Code, and also the land disposal restriction regulations as set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

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

Thank you for your cooperation. If you have any questions concerning this letter, please contact Rebecca Groulx of my staff at (312) 886-4437.

Sincerely yours,

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

Enclosure

cc: Mike Savage, OEPA
Donald North, NWDO

bcc: Ann Budich, REB

5HR-12 groulx.walker 6-8093 diskette F:\drive robert.h

CONCURRENCE REQUESTED FROM REB			
~~OTHER~~ STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
11/20/90	RG 11-28-90	ab 11-30-90	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Delco Moraine New Departure Hyatt

U.S. EPA I.D. No. : OHD 001880442

Street: 2509 Hayes Ave.

City: Sandusky State: Ohio Zip: 44870

Telephone: (419) 627-7000

Owner/Operator:

Street:

City: State: Zip:

Telephone:

Inspection Date: 6/15/90 Time: ___-___

Weather Conditions: Warm/Clear

	Name	Agency/Title	Telephone
Inspectors:	Don North	OEPA/NWDO	(419) 352-8461
Facility Representative:	Bob Hare	Envir. Eng	(419) 627-7076

	Generate	Transport	Treat	Store	Dispose
F-Solvent	✓			✓	
Dioxin					
California List	✓ *			✓	
First Third					
Second Third					

Revised 10-20-89

* Facility could generate D007 - unlikely though.

INSPECTION SUMMARY

Processes That Generate LDR Wastes

New Departure produces automotive bearings. Metal machining lines are operated. Parts cleaning, painting and chrome plating is performed.

Freon (F001) is used for cleaning air bearings in the model shop

Chrome bath and sludge may need to be discarded only if a batch goes bad. (D007)

Toluene/MEK used as paint thinner

LDR Waste Management

Freon stored in drums for less than 90 days

Chromium is reclaimed from plating line rinse water in an enclosed system.

Summary

This company recieved an approved closure plan with modification on 6-7-90. After closure this company will not be a TSD.

Revised 10-20-89

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

   a. F001 through F005 spent solvents

      Yes ✓ No ___ List* Freon, Tol/MEK

   b. Dioxin-containing Wastes

      Yes ___ No ___ List* _____

   c. California List Wastes

      Yes ✓ No ___ List* D007 *possibly

   d. First and Second Third Wastes

      Yes ___ No ___ List* _____

      * List wastes if room allows or attach Appendix A.

      Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

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

   a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ___ Comments _____

   b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ___ Comments _____

   c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ___ Comments _____

d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ___ No ___ Comments _____

e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).

Yes ___ No ___ Comments _____

f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).

Yes ___ No ___ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

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

   Yes ✓ No ___ NA ___

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
   ✓ All other spent solvent wastes

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

   Yes ___ No ___ NA ___

   If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

   * Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

   Yes ___ No ___ NA ___

   If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ___ No ___ NA ___

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

_____

_____

_____

c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ___ No ___ NA ___

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ✓ Comments _____

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ✓ No ___ Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ✓ No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.
Freon 97% sol. used assume over treatment std. Therefore. Same for Toluene/MEK mixture.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ___ No ___

- TCLP Yes ___ No ___ NA ___

  List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

  _____

  _____

  _____

- Total constituent analysis Yes ___ No ___ NA ___

  List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

  _____

  _____

  _____

- pH ≤ 2 Yes ___ No ___ NA ___

  List the wastes for which pH testing was used.

  _____

- Paint Filter Liquid Test Yes ___ No ___ NA ___

  List the wastes for which PFLT was used.

  _____

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

   Yes ___ No ✓ NA ___

C. Management

1. On-Site Management

   Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

   Yes ___ No ✓ Comments Storage less than 90 days

   If yes, the TSD Checklist must be completed.

2. Off-Site Management

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

Yes ✓ No ___ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
F001	Environ Waste Control	
	Inkster Mich	
F005	EWC	

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

Yes ✓ No ___

- Does notification contain the following?

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

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

Yes ___ No ✓ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

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

  Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes ___	No ___
Applicable treatment standards and prohibition levels	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes ___	No ___

c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

  Yes ___ No ___ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

  Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number	Yes ___	No ___
The corresponding treatment standards and all applicable prohibitions	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Date the waste is subject to the prohibitions	Yes ___	No ___

d. Does the facility generate any First or Second Third "soft hammer" waste?

  Yes ___ No ___ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes ___	No ___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ___	No ___
(iii)	Manifest number	Yes ___	No ___
(iv)	Waste analysis data, if available	Yes ___	No ___

3. "Soft Hammer" Demonstrations/Certifications

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ___

b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ___ No ___

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ___	No ___
Addresses	Yes ___	No ___
Telephone numbers	Yes ___	No ___
Contact dates	Yes ___	No ___
Certification statement	Yes ___	No ___

Attach a copy of the demonstration and certification.

e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ___

If yes, attach a copy of written discussion.

f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ___ No ___

Describe the type of treatment and treatment facilities:

Waste Code	Type of Treatment	Treatment Facility

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

Yes ___ No ___

h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ___ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ✓ No ___ Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

   Yes ___ No ___ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

   Yes ___ No ___ NA ___ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No ___

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No ___ Comments _____

   If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

   Yes ___ No ___ NA ___ Comments _____

   If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

N/A

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

_____

_____

_____

B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ___

If yes, list the restricted wastes that have been mixed.

_____

_____

_____

C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)*	Yes ✓	No ___	NA ___
Dioxin (TCLP)	Yes ___	No ___	NA ___
California List (PFLT and/or total constituent analysis)*	Yes ✓	No ___	NA ___
First & Second Third (TCLP and/or total constituent analysis)	Yes ___	No ___	NA ___

* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

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

Yes ✓ No ___ Comments _____

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

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

___ On-site ✓ Off-site

Identify off-site lab: Environmental Waste Control
Inkster, Mi

c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ✓ No ___ NA ___

d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ✓ No ___ NA ___

e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ___ No ___ NA ___

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ✓ No ___

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ✓ No ___ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ✓ No ___ (If no, go to C, Treatment.)

* But facility stores less than 90 days presently. Does not wish to remain storage facility, pursuing closure.

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

___ Tanks
✓ Containers
___ Other (Identify inappropriate storage unit(s).

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ✓ No ___ NA ___

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

   Yes ✓ No ___

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

   Yes ✓ No ___ NA ___

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

   Yes ___ No ___ NA ✓

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

   Yes ___ No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

   Yes ___ No ___ NA ✓

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

   Yes ___ No ✓ NA ___

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

   Yes ___ No ___ NA ___

   If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

   a. In a facility meeting the TSCA criteria in 761.65(b)?

      Yes ___ No ___ NA ___

   b. More than one year [268.50(f)]?

      Yes ___ No ___ NA ___

NA

TSD

C. Treatment

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

   Yes ___ No ___ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code	Treatment Processes
_____	_____
_____	_____
_____	_____

3. Was dilution used as a substitute for treatment [268.3]?

   Yes ___ No ___ Comments _____

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

   Yes ___ No ___ Comments _____

   Have treatment standards or prohibition levels been met?

   Yes ___ No ___ Comments _____

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

   Yes ___ No ___ NA ___

   If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

   Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

   Yes ___ No ___

7. Does the facility treat "soft hammer" wastes?

Yes ___ No ___ (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ___ No ___

N/A

D. Surface Impoundments

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

   Yes ___ No ___ List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

   Yes ___ No ___

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

   Yes ___ No ___

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

   Yes ___ No ___ NA ___

5. Have the Subpart F groundwater monitoring requirements been met?

   Yes ___ No ___ NA ___

6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

   Yes ___ No ___

   Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

   Sludge Yes ___ No ___ Waste Code _____

   Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

   _____
   _____
   _____

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

   Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

    Yes ___ No ___ Comments _____

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

       Yes ___ No ___

    b. Are residues subsequently managed in another surface impoundment?

       Yes ___ No ___

    c. Are residues treated prior to disposal?

       Yes ___ No ___ Comments _____

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

       On-site _____ Off-site _____

       Identify waste code and treatment method:

Waste Code	Treatment Method

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

    Yes ___ No ___ Comments _____

N/A

E. Land Disposal

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

   Yes ___ No ___

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

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

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

   Yes ___ No ___

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   Yes ___ No ___

   If yes, at what frequency? _____

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

   Yes ___ No ___

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

   Yes ___ No ___ Comments _____

   If yes, have the minimum technology requirements been met for all units receiving such wastes?

   Yes ___ No ___

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

   Yes ___ No ___ NA ___

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

   Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

   Yes ___ No ___ List _____

LIST OF RESTRICTED WASTES

CODES:
Asterisk (*) = U.S. EPA has established treatment standards or prohibition levels.
No asterisk = Soft hammer wastes.
Underlined = Potential California List applicability.
Bold Print = Final third and newly listed wastes.
NWW = Non-wastewater
WW = Wastewater

* facility stores all waste less than 90 days

	Gen	Trans	Treat	Store	Disp
F001*	✓			✓	
F002*					
F003*					
F004*					
F005*	✓			✓	
F020*					
F021*					
F022*					
F023*					
F026*					
F027*					
F028*					
Liquid Hazardous Wastes With:					
As* (500 mg/l)					
Cd* (100 mg/l) * Only a possibility					
Cr VI* (500 mg/l) *	✓			✓	
Pb* (500 mg/l)					
Hg* (20 mg/l)					
Ni* (134 mg/l)					
Se* (100 mg/l)					
Tl* (130 mg/l)					
pH* ≤ 2.0					
PCBs* ≥ 50 ppm					
Hazardous Wastes with:					
HOCs* ≥ 1,000 mg/l					
≥ 1,000 mg/kg					
F006 (NWW)*					
(WW)					
F007*					
F008*					
F009*					
F [illegible]*					

	Gen	Trans	Treat	Store	Disp
F011*					
F012*					
F019					
F024*					
K001*					
K004					
K005 (NWW)*					
K007 (NWW)*					
K008					
K009*					
K010*					
K011(NWW)*					
(WW)					
K013(NWW)*					
(WW)					
K014(NWW)*					
(WW)					
K015(WW)*					
K016*					
K017					
K018*					
K019*					
K020*					
K021(NWW)*					
(WW)					
K022(NWW)*					
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K023*					
K024*					
K025(NWW)*					
(WW)					
K027*					
K028*					
K029(NWW)*					
(WW)					
K030*					
K031					
K035					
K036*					

	Gen	Trans	Treat	Store	Disp
K037*					
K038*					
K039*					
K040*					
K041					
K042					
K043*					
K044*					
K045*					
K046 (NWW - nonreactive)*					
(NWW - reactive)					
(WW)					
K047*					
K048*					
K049*					
K050*					
K051*					
K052*					
K060(NWW)*					
(WW)					
K061 (NWW - low zinc)*					
(NWW - high zinc)*					
(WW)					
K062*					
K069 (NWW - nonCaSO$_4$)*					
(NWW - CaSO$_4$)					
(WW)					
K071*					
K073					
K083 (WW)					
K084					
K085					

	Gen/Trans/Treat/Store/Disp
K086	
(NWW - Sol Wash)*	/ / / /
(WW - Sol Wash)*	/ / / /
(NWW - Sol Sludge)	/ / / /
(WW - Sol Sludge)	/ / / /
(NWW - Caustic/Water	/ / / /
(WW - Caustic/Water)	/ / / /
K087*	/ / / /
K093*	/ / / /
K094*	/ / / /
K095 (NWW)*	/ / / /
(WW)	/ / / /
K096 (NWW)*	/ / / /
(WW)	/ / / /
K097	/ / / /
K098	/ / / /
K099*	/ / / /
K100 (NWW)*	/ / / /
K101	
(NWW - low As)*	/ / / /
(NWW - high As)	/ / / /
(WW)*	/ / / /
K102	
(NWW - low As)*	/ / / /
(NWW - high As)	/ / / /
(WW)*	/ / / /
K103*	/ / / /
K104*	/ / / /
K105	/ / / /
K106	/ / / /
K113*	/ / / /
K114*	/ / / /
K115*	/ / / /
K116*	/ / / /
P001	/ / / /
P002	/ / / /
P003	/ / / /
P004	/ / / /

	Gen/Trans/Treat/Store/Disp
P005	/ / / /
P007	/ / / /
P008	/ / / /
P010	/ / / /
P011	/ / / /
P012	/ / / /
P013*	/ / / /
P014	/ / / /
P015	/ / / /
P016	/ / / /
P018	/ / / /
P020	/ / / /
P021*	/ / / /
P026	/ / / /
P027	/ / / /
P029*	/ / / /
P030*	/ / / /
P036	/ / / /
P037	/ / / /
P039*	/ / / /
P040*	/ / / /
P041*	/ / / /
P043*	/ / / /
P044*	/ / / /
P048	/ / / /
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P054	/ / / /
P057	/ / / /
P058	/ / / /
P059	/ / / /
P060	/ / / /
P062*	/ / / /
P063*	/ / / /
P066	/ / / /
P067	/ / / /
P068	/ / / /
P069	/ / / /
P070	/ / / /
P071*	/ / / /
P072	/ / / /
P074*	/ / / /
P081	/ / / /
P082	/ / / /
P084	/ / / /
P085*	/ / / /

	Gen/Trans/Treat/Store/Disp
P087	/ / / /
P089*	/ / / /
P092	/ / / /
P094*	/ / / /
P097*	/ / / /
P098*	/ / / /
P099*	/ / / /
P102	/ / / /
P104*	/ / / /
P105	/ / / /
P106*	/ / / /
P107	/ / / /
P108	/ / / /
P109*	/ / / /
P110	/ / / /
P111*	/ / / /
P112	/ / / /
P113	/ / / /
P114	/ / / /
P115	/ / / /
P120	/ / / /
P121*	/ / / /
P122	/ / / /
P123	/ / / /
U002	/ / / /
U003	/ / / /
U005	/ / / /
U007	/ / / /
U008	/ / / /
U009	/ / / /
U010	/ / / /
U011	/ / / /
U012	/ / / /
U014	/ / / /
U015	/ / / /
U016	/ / / /
U018	/ / / /
U019	/ / / /
U020	/ / / /
U021	/ / / /
U022	/ / / /
U023	/ / / /
U025	/ / / /
U026	/ / / /

	Gen/Trans/Treat/Store/Disp		Gen/Trans/Treat/Store/Disp		Gen/Trans/Treat/Store/Disp
U0	/ / / /	U102*	/ / / /	U170	/ / / /
U029	/ / / /	U103	/ / / /	U171	/ / / /
U031	/ / / /	U105	/ / / /	U172	/ / / /
U032	/ / / /	U106	/ / / /	U173	/ / / /
U035	/ / / /	U107*	/ / / /	U174	/ / / /
U036	/ / / /	U108	/ / / /	U176	/ / / /
U037	/ / / /	U109	/ / / /	U177	/ / / /
U041	/ / / /	U110	/ / / /	U178	/ / / /
U043	/ / / /	U111	/ / / /	U179	/ / / /
U044	/ / / /	U114	/ / / /	U180	/ / / /
U046	/ / / /	U115	/ / / /	U185	/ / / /
U047	/ / / /	U116	/ / / /	U188	/ / / /
U049	/ / / /	U119	/ / / /	U189	/ / / /
U050	/ / / /	U122	/ / / /	U190*	/ / / /
U051	/ / / /	U124	/ / / /	U192	/ / / /
U053	/ / / /	U127	/ / / /	U193	/ / / /
U057	/ / / /	U128	/ / / /	U196	/ / / /
U058*	/ / / /	U129	/ / / /	U200	/ / / /
U059	/ / / /	U130	/ / / /	U203	/ / / /
U060	/ / / /	U131	/ / / /	U205	/ / / /
U061	/ / / /	U133	/ / / /	U206	/ / / /
U062	/ / / /	U134	/ / / /	U208	/ / / /
U063	/ / / /	U135	/ / / /	U209	/ / / /
U064	/ / / /	U137	/ / / /	U210	/ / / /
U066	/ / / /	U138	/ / / /	U211	/ / / /
U067	/ / / /	U140	/ / / /	U213	/ / / /
U069*	/ / / /	U142	/ / / /	U214	/ / / /
U070	/ / / /	U143	/ / / /	U215	/ / / /
U073	/ / / /	U144	/ / / /	U216	/ / / /
U074	/ / / /	U146	/ / / /	U217	/ / / /
U077	/ / / /	U147	/ / / /	U218	/ / / /
U078	/ / / /	U149	/ / / /	U219	/ / / /
U080	/ / / /	U150	/ / / /	U220	/ / / /
U083	/ / / /	U151	/ / / /	U221*	/ / / /
U086	/ / / /	U154	/ / / /	U223*	/ / / /
U087*	/ / / /	U155	/ / / /	U226	/ / / /
U088*	/ / / /	U157	/ / / /	U227	/ / / /
U089	/ / / /	U158	/ / / /	U228	/ / / /
U092	/ / / /	U159	/ / / /	U235*	/ / / /
U093	/ / / /	U161	/ / / /	U237	/ / / /
U094	/ / / /	U162	/ / / /	U238	/ / / /
U095	/ / / /	U163	/ / / /	U239	/ / / /
U097	/ / / /	U164	/ / / /	U244	/ / / /
U098	/ / / /	U165	/ / / /	U248	/ / / /
U099	/ / / /	U168	/ / / /	U249	/ / / /
U101	/ / / /	U169	/ / / /		

OhioEPA
State of Ohio Environmental Protection Agency
Northwest District Office
1035 Devlac Grove Drive
Bowling Green, Ohio 43402-4598
(419) 352-8461 FAX (419) 352-8468

Richard F. Celeste
Governor

Re: Erie County
New Departure Hyatt
OHD 001880442
Hazardous Waste

June 21, 1990

Mr. Robert W. Hare
Delco Moraine New Departure Hyatt
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Hare:

An interim status inspection was conducted by the Ohio EPA at Delco Moraine New Departure Hyatt in your presence on June 15, 1990. The purpose of this inspection is to assess the Company's compliance with state regulations applicable to a hazardous waste generator and treatment, storage or disposal facility. No violations of state law were noted at the time of the inspection.

This inspection did not include a review of financial assurance requirements under RCRA. The results of the land disposal restriction portion of this inspection are being forwarded to USEPA for follow-up.

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

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

A copy of the completed inspection form is enclosed for your review. If you have any questions, please contact me immediately.

Sincerely,

Don North

Donald F. North
Division of Solid and
Hazardous Waste Management

/rab

Enclosure

cc: Teri Martin, DSHWM, CO
Janet Leite, DSHWM, NWDO
NWDO File

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: Delco Moraine New Departure Hyatt
Address: 2509 Hayes Ave
Sandusky, Ohio 44870
County: Erie
Facility Contact: Bob Hare, Environmental Engineer

Inspector(s)Name(s): Don North

Date of Inspection 6-15-90
HWFB #: 03-22-0464
USEPA ID #: OHD 001880442
Facility Phone #: (419) 627-7000
Facility Contact Phone#: (419) 627-7076
Safety Equipment #:

STATUS
Cond. Ex. SQG___ SQG___ Generator ✓ Transporter___ Treatment___ Storage ✓ Disposal___

ACTIVITIES
Containers ✓ Tanks___ Surface Impoundments___ Incineration/Thermal treatment___
Waste pile___ Land treatment___ Landfill___ Groundwater monitoring___
Used oil burner___ Hazardous waste fuel burner/blender___

	Y/N/NA	REMARK #
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	Y	
2. Are they :		
a. Abandoned(disposed;incinerated;accumulated; stored, or treated prior to disposal)?	Y	
b. Recycled?	Y	
c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?	N	
3. If recycled or accumulated, treated or stored before recycling, is the waste:		
a. Used in a manner constituting disposal?	N	
b. Burned for energy recovery?	N	
c. Reclaimed? (Refer to Table 1 of 3745-51-02)	Y	Cr in enclosed unit
d. Accumulated speculatively?	N	
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?	NA	
b. Used as an effective substitute for commercial products?		
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?		

	Y/N/NA	REMARK #
5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	Y	
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	Y	
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	Y	
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	N/A	
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	Y	(1)
10. Has the facility submitted a Part B?	N	
11. Was advance notice of the inspection given? If so, how far in advance?	Y	1 week

(1) New Departure has elected to store for less than 90 days and has submitted a closure plan for container storage. The closure plan was approved with modifications 6-7-90.

REMARKS. GENERAL INFORMATION.

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

New Departure produces automotive bearings; metal machining and finishing lines are operated. Parts cleaning and chrome plating is performed.

- Petroleum Naphtha (D001) used to clean parts

Freon (F001) is used in the model shop where special air bearings are manufactured.

Mineral spirits (D001) used to clean paint guns, brushes and other painting equipment.
Paint Thinner (F005)

Chromium (D007) is reclaimed from a plating line rinsewater in an enclosed system. Occasionally chromium bath and sludge may need to be discarded if a batch goes bad. This concentrated chromium can't go to the reclamation unit.

A maximum of (56) 55 gallon drums can be stored (< 90 days) in the waste storage building, which is equipped with a 6" curb.

Wastes are sent to Environmental Waste Control, Inc., Inkster, Mi

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)	Y/N/NA	REMARK #
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	Y	
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?	N	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?	Y	Cr reclamation unit (however, could have some sludge or liq to dispose of accidentally)
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N	
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:		
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?	Y	
b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?	Y	
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?	Y	
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?	Y	
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?	N/A	
f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?	Y	

	Y/N/NA	REMARK #
6. Does the generator meet the following hazardous waste pre-transport requirements:	✓	(1)
a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	Y	
b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	Y	
c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	Y	
7. Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	N/A	
8. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a. The containers or tanks are clearly marked with the words "Hazardous Waste"?	Y	
b. The date that accumulation began is clearly marked on each container?	Y	
c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete Management of Containers checklist.	✓	

(1) Environmental Waste Control, Inkster, MI transports

	Y/N/NA	REMARK #
d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist.	N/A	
e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:		
1. Quantities of waste accumulated do not exceed 55 gallons at any time?	Y	
2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?	N/A	
3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77?	Y	
4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?	Y	
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days?	N	
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?	N/A	
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	N	

	Y/N/NA	REMARK #
12. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	Y	
13. Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	Y	
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	Y	
15. Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.	✓	

REMARKS, GENERATOR REQUIREMENTS

MAR 12 1990

5HR-12

Mr. Robert Hare
General Motors Corporation
Delco Moraine New Departure Hyatt Division
2509 Hayes Avenue
Sandusky, Ohio 44870

Re: Compliance Letter
GMC New Departure Hyatt
OHD 001 880 442

Dear Mr. Hare:

On June 20, 1989, the Ohio Environmental Protection Agency (OEPA),representing the United States Environmental Protection Agency (U.S. EPA),conducted a Resource Conservation and Recovery Act (RCRA) inspection of theabove referenced facility. The purpose of the inspection was to determinethe compliance status of this facility with respect to the applicablehazardous waste management requirements of Chapter 3734 of the Ohio RevisedCode, and also the land disposal restriction regulations as set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

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

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

Sincerely yours,

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

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT.	ab	SKS	
DATE	2-27-90	2-28-90	

Enclosure

cc: Mike Savage, OEPA
Don North, NWDO

bcc: Sally Swanson, REB

5HR-12 budich.walker 6-8093 1/24/90 filename: robhare.ltr diskette #4

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Delco Wrain New Departure Hyatt

U.S. EPA I.D. No.: OHD 001880442

Street: 2509 Hayes Ave.

City: Sandusky State: Ohio Zip Code: 44870

Telephone: (419) 627-7000

Operator: Same as above

Street:

City: State: Zip Code:

Telephone:

Owner:

Street: 3044 West Grand Blvd

City: Detroit State: Mi Zip Code: 48232

Telephone: (313) 974-7770

Inspection Date: 6/26/89 Time: 9:30 - 12:30 Weather Conditions: Clear

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

Facility Representatives: Bob Hare - Envir Eng

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

Revised 9-26-88

* Notification necessary after November 8, 1986

INSPECTION SUMMARY

New Departure produces automotive bearings. Metal machining and finishing lines are operated.

In the Model Shop where special air bearings are manufactured Freon solvent (1,1,2-trichloro-1,2,2 trifluoro ethan, F012) is used for cleaning. The solvent is dispensed in approx. 2 gal pails for cleaning and discarded in 55 gal drum nearby when dirty. Full 55 gal drum moved to storage area up in 3 days.

Facility is currently under interim status as a storage facility but has submitted 2 closure plans to end > 90 storage and revert to generator status alone.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

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

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

B. California List Wastes

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

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

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

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

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

____	____	____	____	____

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

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

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

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

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

____	____	____	____	____

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

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

C. First Third Wastes

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

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

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

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

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

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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

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

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

   ✓ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

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

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

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ____ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

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

      _____
      _____
      _____

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

____ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

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

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

Waste Code	Wastewater	Nonwastewater

B. Waste Analysis

1. F-Solvent Wastes

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

✓ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

✓ Yes ____ No * also yearly characterization.

If yes, is any supporting data available for review? Describe how this is adequate. Waste analysis documents solvent is 45.7% 1,1,2-trichloro, 1,2,2-trifluoroethane therefore presumed to exceed treatment standard.

- TCLP

____ Yes ✓ No

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

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

✓ Yes ____ No ____ NA

If yes, specify the waste stream: F002 1,2-trichloro-1,22 trifluoroethane

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

____ Yes ✓ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?
They have stated they will perform new analysis

2. California List Wastes

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

____ Yes ____ No ____ NA

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

____ Yes ____ No ____ NA

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

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

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

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

- Knowledge of wastes

____ Yes ____ No ____ NA

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

_____

_____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

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

_____ Yes _____ No _____ NA

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

_____

_____

_____

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

_____ Yes _____ No _____ NA

3. First Third Wastes:

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

_____ Yes _____ No _____ NA

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

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

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

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

_____

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

____ Yes ____ No ____ NA

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

_____

_____

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

____ Yes ____ No ____ NA

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

_____

_____

_____

C. Management

1. On-Site Management

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

✓ Yes (Stored) ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

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

✓ Yes ____ No (Envir. Waste Control, Inc Dunkster, IN)

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

✓ Yes* ____ No

* But only since August 1988

c. Does notification contain the following?

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

* on file completed annually

Identify off-site treatment or storage facilities: Emron, Waste Control, Inc. Inkster, MI

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

____ Yes ✓ No

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

____ Yes ____ No N/A

f. Does notification contain the following? N/A

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

Identify off-site land disposal facilities: _____

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

____ Yes ✓ No ____ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No N/A

i. If yes, does the notification contain the following information? N/A

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

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

✓ Yes ____ No

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

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

____ Yes ____ No

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

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

Attach a copy of the demonstration and certification

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

____ Yes ____ No

If yes, attach a copy of written discussion.

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

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

_____

_____

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

_____ Yes _____ No

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

_____ Yes _____ No

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

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

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

_____ Yes _____ No

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

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

_____ Yes _____No

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

_____

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS N/A

A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:
_____ Interim status for storage
_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____
_____
_____

B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards Storage facility

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

o F-solvent	✓ Yes	___ No	___ NA
o California List	___ Yes	___ No	___ NA
o First Third	___ Yes	___ No	___ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues? St is 95% pure presumed to exceed treatment standard

✓ Yes * ___ No

a. What date was the waste analysis plan last revised? June 1, 1989

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

___ On-site ✓ Off-site

Identify off-site lab: Environmental Waste Control, Inc.

c. Is F-solvent waste analyzed using TCLP?

___ Yes ✓ No ___ NA

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

___ Yes ___ No ✓ NA

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

e. Describe the frequency of sampling: Once each year

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

✓ Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

✓ Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

____ Tanks
✓ Containers

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

✓ Yes ____ No ____ NA

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

✓ Yes ____ No

5. Do operating records agree with container labeling?

✓ Yes ____ No ____ NA

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

____ Yes ✓ No

* Facility record indicates no notice sent until August 1988.

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

____ Yes ✓ No ____ NA

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

____ Yes ____ No

If yes, state how: _____

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

____ Yes ____ No ✓ NA

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

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ✓ NA

_____

C. Treatment N/A

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

____ Yes ____ No

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

2. Describe the treatment processes:

_____

_____

_____

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

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

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

_____ Yes _____ No _____ NA

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

_____ Yes _____ No

If yes, does notification contain the following?

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

Identify off-site disposal facilities: _____

_____

_____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments N/A

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

_____ Yes _____ No

If no, go to E, Land Disposal.

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

_____ Yes _____ No

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

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

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

_____

_____

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

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

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

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

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

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. Land Disposal N/A

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

_____ Yes _____ No

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

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

_____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

_____

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

_____ Yes _____ No

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

_____ Yes _____ No

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

_____ Yes _____ No _____ NA

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

_____

_____

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

_____ Yes _____ No _____ NA

Re: Erie County
Hazardous Materials
GMC-New Departure-Hyatt
HWFAB #03-22-0464

August 13, 1982

Mr. Robert Hare
Environmental Engineer
GMC-New Departure-Hyatt
2509 Hayes Avenue
Sandusky, OH 44870

Dear Mr. Hare:

On August 3, 1982, Dave Businger, Ohio EPA Northwest District Office, conducted an inspection of your facility, which was represented by yourself and Sam Blackwood. At that time, the following problem areas were noted as referenced to in the enclosed Inspection Form:

Page 4-8, 1(e)	Violation of 40 CFR 265.112 (a)(4) and Ohio Administrative Code 3745-56-03 (A)(4). The year closure is expected to begin is not listed.

A copy of the form completed during the inspection is enclosed. Please send copies of the above mentioned item to the Northwest District Office of the Ohio EPA within 30 days.

If you have any questions, please feel free to call at 352-8461.

Sincerely,

David A. Businger
David A. Businger
Intern

David L. Ferguson
David L. Ferguson
Environmental Scientist

DAB/kb

Enclosure

cc: Kathy Homer, U.S. EPA, Region V w/encl.
cc: Paula Cotter, DHM, CO w/encl.
cc: Bob Fragale, HWFAB w/encl.

State of Ohio Environmental Protection Agency
Northwest District Office
1035 Devlac Grove Drive, Bowling Green, Ohio 43402-4598 (419) 352-8461

James A. Rhodes, Governor
Wayne S. Nichols, Director

RCRA INTERIM STATUS INSPECTION FORM

U.S. EPA I.D. NO. OHD001880442

PART 1. GENERAL INFORMATION

Facility: GMC-New Departure Hyatt Address: 2509 Hayes Ave. City: Sandusky

State: OH Zip Code: 44870 County: Erie Telephone: (419) 627-7076

Facility Operator: _____ Title: _____ Telephone: _____

Facility Owner: General Motors Corporation Address: 3044 W. Grand Blvd.

City: Detroit State: MI Zip Code: _____ Telephone: _____

Type of Ownership: ✓ Private _____ Government State HWFAB No. 03-22-0464

Date of Inspection: 8-3-82 Time of Inspection: (Start) 10:30 am (Finish) 12:00

Advance Notification? ___ No ✓ Yes: _____

Weather Conditions: Fog in the morning. Hot and humid.

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Sam Blackwood	Fire Chief	(419) 627-7186
2.	Robert Hare	Environmental Engineer	(419) 627-7076
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	David A. Businger	Intern	(419) 352-8461
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ____ Generation B. ✓ Storage C. ____ Treatment D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F007, F001, U226, F008

b) Non-Listed Wastes: ✓ D001 I ✓ D002 C ____ D003 R ____ D000 T

3. Has this facility submitted a Part A Permit Application? ✓ Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

____ Yes, See Remark # ____ ✓ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ✓ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

New Departure - Hyatt Bearings, Division of General Motors Corporation is a bearings manufacturer which operates various metal machining and finishing operations.

REMARKS, PART 1. (GENERAL INFORMATION)

Please consolidate your Contigency Plan for review and mail one copy to: Tom Crepeau, Manager, Permits & Manifest Records Section, DHMM, Ohio EPA, 361 E. Broad St., Columbus, OH 43216-1049.

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	✓			
a) Inspect emergency equipment.	✓			
b) Inspect monitoring equipment.			✓	
c) Inspect security, alarm and communications devices.	✓			
d) Inspect process equipment (pipes, pumps, etc.).	✓			
e) Inspect containment structures (dikes, curbs, etc.).			✓	
f) Inspect facility for structural malfunctions (roof, floor, etc.).			✓	
g) Inspect hazardous waste handling/loading areas each day used.	✓			
h) Record of any malfunctions due to equipment or operator errors.	✓			
i) Record of any hazardous waste discharges.			✓	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	✓			
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓			
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	✓			

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	✓			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	✓			
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	✓			
b) Artificial or natural barrier completely surrounding the active portion of the facility.	✓			
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	✓			
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	✓			temporary placement

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).			✓	
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).			✓	Have own fire brigade, doctors, and nurses.
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).			✓	

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	✓			1
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			Ohio EPA
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).			✓	Disaster Plan in Personnel
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	✓			

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.	✓			
b) Physical separation of incompatible waste materials.	✓			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓			temporary placement
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.			✓	

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	✓			
a) Internal alarm system	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	✓			

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	✓			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	✓			for an oil spill

Subpart E: Manifests/Records/Reporting

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

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	✓			
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).			✓	drums

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.	✓			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).			✓	
g) Records of any waste analyses and trial tests required to be performed.	✓			
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	✓			
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	✓			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	✓			
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by ~~March 1~~ April 30) containing all of the operating information required under Sections 265.75 and 3745-55-75.	✓			signed 6-14-82

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).			✓	

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

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).			✓	

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).				
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).				
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.				
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.				

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.			✓	

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.				
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.				

Subpart G: Closure and Post-Closure

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

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	✓			
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	✓			
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.		✓		missing closure yea
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	✓			7/9/82

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.			✓	
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.			✓	
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.				
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).				
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).				

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.				
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.				
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.				
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.				

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.				

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	✓			

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

#1 This facility maintains a Spill Prevention Control & Countermeasure Plan.

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).			✓	

#1. At the time of the inspection there were no hazardous wastes on site.

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L. Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).			✓	#1
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	✓			

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	✓			
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).			✓	

Re: Application Number 81-HW-0464
Sandusky County

September 8, 1981

Robert Hare, Environmental Engineer
GMC-New Departure Hyatt
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Hare:

On July 28, 1981, David Ferguson and Thomas Wray of the Ohio EPA conducted an inspection of your facility as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself/

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/maf

cc: Kathleen Homer, USEPA, Region V
Thomas Wray, NWDO

CERTIFIED MAIL

Tim Reinspection

STATE IDENTIFICATION NUMBER
81-HW 0464

EPA IDENTIFICATION NUMBER
OHD 001850442

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

(A) Facility Name: GMC - New Departure Hyatt
(B) Street: 2509 Hayes Ave
(C) City: Sandusky (D) State: OH (E) Zip Code: 44870
(F) Phone: 419-627-7076 (G) County: Erie

(H) Operator: As Above
(I) Street:
(J) City: (K) State: (L) Zip Code
(M) Phone: (N) County:

(O) Owner: General Motors Corp.
(P) Street: 3044 W. Grand Blvd.
(Q) City: Detroit (R) State: Mich. (S) Zip Code:
(T) Phone: (U) County:
(V) Date of Inspection: 7/28/81 9/1/81 (W) Time of Inspection (From) (To)
(X) Weather Conditions:

(Y) Person(s) Interviewed	Title	Telephone
Robt. Hare	Env. Eng.	419-627-7076

(Z) Inspection Participants	Agency/Title	Telephone
David L. Ferguson	Env. Scientist	419-352-8461
Thomas K. Wray	Haz Waste Sci.	419/352-8461

(AA) Preparer Information

Name	Agency/Title	Telephone
Thomas K. Wray	Haz Waste Scientist	419/352-8461

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:

* ~~Generator only~~

X A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	N/A			
2. Facility expansion?	N/A			
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	N/A			
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X			GUARDS
2. Artificial or natural barrier around facility?	X			
3. Controlled entry?	X			
4. Danger sign(s) at entrance?		X		
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X			
2. Records of operator error?	X			
3. Records of discharges?	X			

*Not Inspected

II GENERAL FACILITY STANDARDS Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?		X		NOT SPECIFIED; M.C.B. DONE REGULARLY
5. Safety, emergency equipment?	X			
6. Security devices?	X			
7. Operating and structural devices?	X			
8. Inspection log?	X			HASN'T BEEN KEPT UP-TO-DATE
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X			
2. Job descriptions?	X			
3. Description of training?	X			
4. Records of training?	X			
5. Have facility personnel received required training by 5-19-81?	X			
6. Do new personnel receive required training within six months?	X			
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X			
2. No smoking signs?		X		NONE AT STORAGE SITE
3. Separation and protection from ignition sources?	X			

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		X		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	X			
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:

City water; 2 - 1500 gal/min pumps (1 diesel, 1 electric)
150,000 gal storage tank H_2O spec. for fire control

	Yes	No	NI*	Remarks
(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			

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? X

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	X			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	N/A			

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	X			
2. Are records of past shipments retained for 3 years?	X			
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	X			

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?	X			
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X			
c. The location and quantity of each hazardous waste within the facility?	X			
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	N/A			
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			
f. Reports detailing all incidents that required implementation of the Contingency Plan?	X			
g. All closure and post closure costs as applicable? (Effective 5-19-81)	X			NOTHING ON THE DRUM STORAGE AREA

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	X			NOTHING FOR DRUM STORAGE AREA
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			see VII (A) 1.
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	N/A			

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: GMC - New Departure Hyatt Date of Inspection: 9/1/81

	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		HASN'T BEEN DONE REGULARLY
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X			IGNITABLE

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	X			
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	X			

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

*Not Inspected

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	___	___	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	X			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6. The total quantity of waste(s) and the type and number of containers loaded?	X			
7. Required certification?	X			
8. Required signatures?	X			
(C) Does the owner or operator submit exception reports when needed?	X			

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	X			
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	X			
(C) If required, are placards available to transporters of hazardous waste?	X			

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Company policy concerning waste has changed. Essentially all Hazardous waste generated will be stored in drums. A new, amended Part A application will be sent shortly to accurately reflect these changes.

Deficiences have been noted in the inspection form next to the item.

[illegible]
9/2/87

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-HW-0464
OWNER - General Motors Corp.
FACILITY NAME - New Departure Hyatt
FACILITY LOCATION - 2509 Hayes Ave., Sandusky, Ohio 44870
FACILITY CONTACT - Robert Hart PHONE NO. - (419) 627-70
ISS INSPECTION DATE - 7/22/81
9/1/81

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"	B		
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
4	4	"	"	B		
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"	B		
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.			C	Reference	USEPA Referen	See Code Following	Refer To ISS Remark	OEPA Use
		A	2		3745-55-52	265.52			
			3		"	"			
			4		"	"			
			5		"	"			
7		B	1		3745-55-53	265.53			
		C	1		3745-55-55	265.55			
			2		"	"			
			3		"	"			
		D	1		3745-55-56	265.56			
	VI	A	1		3745-55-71	265.71			
			2		"	"			
		B	1		3745-55-72	265.72			
8		C	1		3745-55-73	265.73			
			2b		"	"			
			c		"	"			
			d		"	"			
			e		"	"			
			f		"	"			
			g		"	"			
9	VII	A	1		3745-56-03	265.112			
			2		"	"			
			3		"	"			
			4		3745-56-32	265.142			
		B	1		3745-56-09	265.118			
	VIII	I	1		3745-56-51	265.171			
			2		3745-56-52	265.172			
			3		3745-56-53	265.173			
			4		"	"			
			5		3745-56-54	265.174	B		
			6		3745-56-56	265.176			
10			7		3745-56-57	265.177			
			8		"	"			
		J	1		3745-56-72	265-192			
			2		"	"			
			3		"	"			
			4		3745-56-73	265-193			
			5		3745-56-74	265.194			
			6		3745-56-78	265.198			
			7		3745-56-79	265.199			
11			8		3745-56-78	265.198			
		K	1		3745-57-03	265.222			
			2		3745-57-04	265.223			
			3		3745-57-06	265.225			
			4		3745-57-07	265.226			
			5		"	"			
			6		3745-57-10	265.229			
			7		3745-57-11	265.230			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12		L	1	3745-57-31	265.251			
			2	3745-57-32	265.252			
			3		265.258			
			4	3745-57-36	265.256			
			5	"	"			
			6	3745-57-37	265.257			
			7	3745-57-37	265.257			
13		M	1	3745-57-52	265.272			
			2	"	"			
			3	3745-57-53	265.273			
			4	3745-57-56	265.276			
			5	3745-57-58	265.278			
			6	3745-57-58	265.278			
			7	3745-57-59	265.279			
			8	3745-57-61	265.281			
			9	3745-57-62	265.282			
14	N	A	1	3745-57-72	265.302			
			2	"	"			
			3	"	"			
			4	"	"			
		B	1	3745-57-79	265.309			
			2	"	"			
		C	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.192			
		D	1	3745-57-82	265.312			
15				3745-55-17	265.17(b)			
		E	1	3745-57-83	265.313			
			2	3745-55-17	265.17(b)			
		F	1	3745-57-84	265.314			
			2	"	"			
			3	"	"			
			4	"	"			
		G	1	3745-57-85	265.315			
16		O&P						
	I	B	1	3745-58-33	265.373			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
	II	A	1a	3745-58-35	265.375			
			b	"	"			
			c	"	"			
17								
			2a	3745-58-35	265.375			
			b	"	"			
		B	1	"	"			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			

Page	Item No.	OAC Reference	USEPA Refe ıce	See Code Following	Refer To ISS Remark	O: U:
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265-405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	50-42	122.5			
	(C)	3745-52-42	262.42			
	2. (A)	3745-52-30	262.30			
	(B)	3745-52-31	262.31			
	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23	X I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (CO. .N IV)

A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.

B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.

D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 20 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.

E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.

F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.

G. NFPA's code requires that the tanks be located 50 feet from the property line.

Determination: NFA

PA/VSI Or RFA FILE REVIEW CHECKLIST

Facility Name: Delphi Chassis Div.

EPA ID: OHD 001 880 442___ Address: 2509 Hayes Ave. Sandusky, Erie Co., OH

Name of Reviewer: Maureen McHugh_____ Date of Review: 8/27/08_____

1	Yes	No	Is this a one folder site?
2	Yes	No	Are there Superfund files for this site?
3	Yes	No	Did you Read the Executive Summary?
			There are: __16__ SWMUs and ___3__ AOCs at this site.
4	Yes	No	Did you review the regulatory history?
5	Yes	No	Does the facility have interim status or a permit?
			This facility is a: __X__ SQG, _____ LQG, or ____ Less than 90 day.
6	Yes	No	Was the Facility closed per RCRA? RCRAInfo 380 and 389 (1991 & 1994)
			If Yes, was the closure: _X___ CC, or _____ CIP.
7	Yes	No	Are there documented (historical) releases? Briefly describe on Page 2.
8	Yes	No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	Yes	No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSI or RFA file, please classify this site as:

__X___No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

_____ Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

_____ More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.

PA/VSI Or RFA FILE REVIEW CHECKLIST

Notes

Superfund NFRAP

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

-Various types of oils were spilled on the ground. Stained soils were removed and tested to contain PCBs and other contaminants below concentrations that would deem them hazardous. The soil was to be disposed in a landfill.
-Downstream samples taken from Mill Creek indicated low dissolved oxygen levels and high ammonia levels, downstream sediment samples indicated elevated concentrations of cadmium, chromium, lead, zinc, and copper. Diversity has declined in the macroinvertebrate and fish communities due to wastewater discharges into Mill Creek.
-In 1990, 2 USTs were removed and soils collected from the site were contaminated with TPH and BTEX at concentrations warranting soil removal. The soil was removed and groundwater samples were taken from the bottom of the excavation. The groundwater contained 271mg/L benzene, 375mg/L toluene, and 378mg/L ethylbenzene. The groundwater was pumped and resampled until cleanup levels had been met.
-PCB-contaminated oil was released from a UST in 1990. Contaminated soil and concrete was removed (1228tons) and disposed off site. Groundwater did not show any contamination above the detection limit.
-Monitoring wells were installed around the finishing ponds in 1981 and groundwater samples indicated .02mg/L cyanide, .11mg/L chromium, and .03mg/L cadmium. OEPA said these levels were acceptable and later sampling did not reveal any contaminants.

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

Oily sheen in part of the northern finishing pond (SWMU7).
Stains in the area around the secondary containment wall at SWMU14, the oil cookers and recycled oil tank.
SWMU15- the grind sludge collection areas- housekeeping appeared inqdequate at the concrete pad, waste materials had migrated off the pad onto surrounding gravel areas.
SWMU16- fly ash piles were not covered and fly ash was blowing off the piles.
Ponded rainwater in the containment areas at AOC2 (tank farm secondary containment) and an oily sheen on the water.
Oil stained ground at the recycle oil tank (AOC3)

PA/VSI Recommendations

Sediment sampling in Mill Creek and below reservoirs (SWMU5- WWTP & SWMU6- Inactive WWTP), sludge and monitoring well sampling at the finishing ponds (SWMU7), soil sampling at the sludge drying bed, sludge disposal area, and refuse disposal trenches (SWMU8,9,10), inspect the oil cookers and recycled oil tank for leaks (SWMU14), Cover or wet down the fly ash piles (SWMU16), soil sampling at the outdoor product storage area, the tank farm secondary containment, and the oil–stained ground at the recycled oil tank (AOC1,2,3).

Dave Sholtis from OEPA said this facility is bankrupt
Therefore NFA can be taken under RCRA

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

RELEASED
DATE 10/5/01
BY
INITIALS

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

PRC Environmental Management, Inc.

Determination: NFA

PA/VSI Or RFA FILE REVIEW CHECKLIST

Facility Name: Delphi Chassis Div.

EPA ID: OHD 001 880 442___ Address: 2509 Hayes Ave. Sandusky, Erie Co., OH

Name of Reviewer: Maureen McHugh_____ Date of Review: 8/27/08_____

1	Yes	No	Is this a one folder site?
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			There are: __16__ SWMUs and ___3__ AOCs at this site.
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			This facility is a: __X__ SQG, _____ LQG, or ____ Less than 90 day.
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8	Yes	No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	Yes	No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSI or RFA file, please classify this site as:

__X___No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

_____ Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

_____ More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.

PA/VSI Or RFA FILE REVIEW CHECKLIST

Notes

Superfund NFRAP

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

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-Downstream samples taken from Mill Creek indicated low dissolved oxygen levels and high ammonia levels, downstream sediment samples indicated elevated concentrations of cadmium, chromium, lead, zinc, and copper. Diversity has declined in the macroinvertebrate and fish communities due to wastewater discharges into Mill Creek.
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-PCB-contaminated oil was released from a UST in 1990. Contaminated soil and concrete was removed (1228tons) and disposed off site. Groundwater did not show any contamination above the detection limit.
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Ponded rainwater in the containment areas at AOC2 (tank farm secondary containment) and an oily sheen on the water.
Oil stained ground at the recycle oil tank (AOC3)

PA/VSI Recommendations

Sediment sampling in Mill Creek and below reservoirs (SWMU5- WWTP & SWMU6- Inactive WWTP), sludge and monitoring well sampling at the finishing ponds (SWMU7), soil sampling at the sludge drying bed, sludge disposal area, and refuse disposal trenches (SWMU8,9,10), inspect the oil cookers and recycled oil tank for leaks (SWMU14), Cover or wet down the fly ash piles (SWMU16), soil sampling at the outdoor product storage area, the tank farm secondary containment, and the oil–stained ground at the recycled oil tank (AOC1,2,3).

Dave Sholtis from OEPA said this facility is bankrupt
Therefore NFA can be taken under RCRA

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

RELEASED
DATE 10/5/01
RIN #
INITIALS

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRC

RELEASED
DATE 10/5/01
RIN #
INITIALS

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

DELCO MORAINE NDH DIVISION (FORMERLY GMC NEW DEPARTURE HYATT) SANDUSKY, OHIO OHD 001 880 442

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 001 880 442
Date Prepared	:	December 19, 1991
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH84
Prepared by	:	PRC Environmental Management, Inc. (Julie Kaiser)
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

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Attachments

A EPA PRELIMINARY ASSESSMENT FORM 2070-12

B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

C VISUAL SITE INSPECTION FIELD NOTES

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RELEASED
DATE 10/5/07
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 Delco Moraine NDH Division (DMNDH) facility in Sandusky, Ohio. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The DMNDH facility is a division of General Motors Corporation and manufactures steel bearings. The facility is 133 acres in size and has been in operation since 1945. Waste petroleum naptha, paint waste, and spent freon solvent are hazardous wastes routinely generated at the facility. Nonhazardous wastes generated on site include wastewater treatment plant sludge, waste oil, air filtration dust, metal chips, recycled oil, grind sludge, and fly ash. No RCRA corrective action is known to have been taken at the facility. The facility is currently only a generator of hazardous waste and is undergoing closure activities to have its interim status withdrawn.

The PA/VSI identified the following 16 SWMUs and three AOCs at the facility:

Solid Waste Management Units

1. Enclosed Container Storage Area
2. Outdoor Container Storage Area
3. Hazardous Waste Satellite Accumulation Areas
4. Chromium Recovery Unit
5. Wastewater Treatment Plant
6. Inactive Wastewater Treatment Plant
7. Finishing Ponds
8. Sludge Drying Bed
9. Sludge Disposal Area
10. Refuse Disposal Trenches
11. Air Pollution Control Equipment
12. Metal Chip Storage Bins, Chip Crusher, and Chip Wringer
13. Metal Chip Silo
14. Oil Cookers and Recycled Oil Tank
15. Grind Sludge Collection Areas
16. Fly Ash Piles

Areas of Concern

1. Outdoor Product Storage Area
2. Tank Farm Secondary Containment
3. Oil-Stained Ground at Recycled Oil Tank

Several spills at the facility since 1978 have been reported to Ohio Environmental Protection Agency, Division of Emergency and Remedial Response. A 1985 study of Mills Creek, the stream to which wastewater treatment plant (SWMU 5) and finishing ponds (SWMU 7) discharge treated wastewater, revealed impacts on fish and macroinvertebrate species and elevated concentrations of heavy metals downstream of the DMNDH facility. Observed releases to on-site soils were documented in two underground fuel storage tank locations; contaminated soil and ground water have been removed from one of these locations. A release of polychlorinated biphenyls occurred from an underground tank inside the plant; this area has also been remediated.

There are several inactive SWMUs that have inadequate containment, operated for many years, and are suspected to have managed hazardous wastes; the potential for release to ground water and on-site soils from these units is therefore moderate. The three AOCs are areas where raw materials are stored and there is evidence of release to on-site soils and inadequate secondary containment. The potential for release to air from all SWMUs and AOCs is low because either the units do not manage potentially airborne hazardous wastes or secondary containment is adequate.

Ground water is not used for drinking water downgradient of the site. The area is served by the Sandusky municipal water supply system, which is supplied by a Lake Erie intake approximately 0.75 miles offshore. Mills Creek flows into Lake Erie approximately 1.5 miles downstream of the facility. No sensitive environments are known to exist within 2 miles of the facility. Potential for the public to come into direct contact with on-site hazards is minimal because the site is secured by a fence and a 24-hour surveillance system. The potential for a release to air appears to be minimal based on lack of evidence that a release is likely and that releases have not occurred over the past 17 years.

Recommendations for further action include the following: sample sediment in Mills Creek to identify whether an observed release to surface water has occurred from the DMNDH outfall; sample soils beneath the inactive wastewater treatment plant resevoirs to determine whether hazardous wastes have seeped out; sample sludge in the finishing ponds to determine whether hazardous wastes have been deposited there; sample monitoring wells around finishing ponds to determine current ground-water conditions; sample soil in the sludge disposal areas and refuse disposal trenches to determine the nature of the sludge and refuse previously disposed of on site; inspect the recycled oil tank for leaks; cover or wet down the fly ash piles to minimize the potential for particulate emissions; and sample soil in the outdoor product storage area, tank farm secondary containment, and around the recycled oil tank to determine whether a release to on-site soils has occurred.

~~ENFORCEMENT CONFIDENTIAL~~

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 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 RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases 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, regardless of whether the unit was intended to manage 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 EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped 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 nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- 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 generally includes 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 as follows:

- 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 appropriate 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 Delco Moraine NDH Division (DMNDH) facility in Sandusky, Ohio. The PA was completed on April 5, 1991. PRC gathered and reviewed information from Ohio Environmental Protection Agency EPA (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on April 25, 1991. It included interviews with DMNDH facility representatives and a walk-through inspection of the facility. Sixteen SWMUs and three AOCs were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 14 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

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

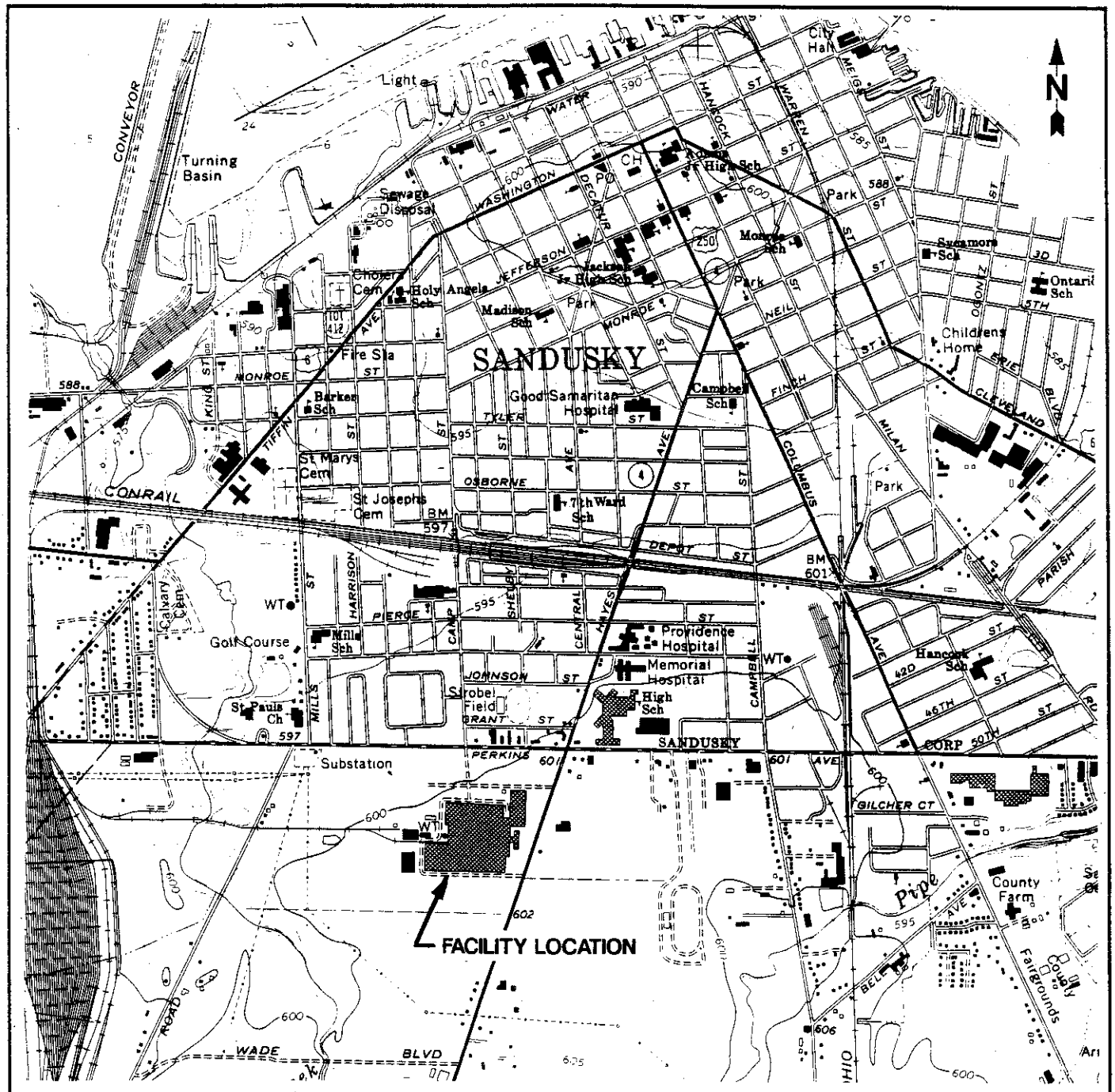
The DMNDH facilityis located at 2509 Hayes Avenue on the south side of Sandusky in Erie County, Ohio (41°26'00" latitude, 82°42'55" longitude). Land use surrounding the facility is a mixture of agricultural, residential, and commercial (see Figure 1). The site is bordered on the north by Perkins Avenue and on the east by Hayes Avenue. Access to the facility is gained via Hayes Avenue. The facility is 133 acres in size.

2.2 FACILITY OPERATIONS

The DMNDH facility, a division of General Motors Corporation (GMC), manufactures automotive and non-automotive steel bearings. The facility was previously called GMC New Departure Hyatt (GMCNDH) and has been in operation since November 1945. Manufacturing areas occupy 1,300,000 square feet of the 133 acres owned by DMNDH. The facility currently employs approximately 2,000 people.

Raw materials are purchased by the facility in the form of steel forgings. These forgings undergo normalizing heat treatment before they are shot-blasted clean. Contours in the parts are machined by lathe, and the parts are heat treated, tempered, demagnetized, cooled, and cleaned. Splines in the parts are broached, holes are punched and chamfered, and various surfaces are ground and honed. Parts are then sent to assembly machines where balls, grease, seals, speed sensors, or antilock brake components are installed. Complete spindle assemblies are then packed and shipped. DMNDH uses a hard chrome electroplating line to plate tools and machine component parts; no manufactured parts are plated at the facility. The only painting operation conducted at the facility is for equipment maintenance. An on-site wastewater treatment plant treats plating wastes, metal working fluids, product washwater, and some stormwater.

A total of 16 SWMUs and three AOCs were identified during the VSI. SWMUs are listed in Table 1. Locations of SWMUs and AOCs are identified in Figure 2. SWMUs include two container storage areas (CSA). Containerized hazardous wastes were previously stored outside on a concrete pad in the southwest portion of the property (SWMU 2). This area is closed, and hazardous wastes are now stored in a shed southwest of the boiler house (SWMU 1).



SCALE 1:24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SOURCE: USGS, Photo revised 1979.

DELCO MORAINE NDH DIVISION
SANDUSKY, OHIO

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

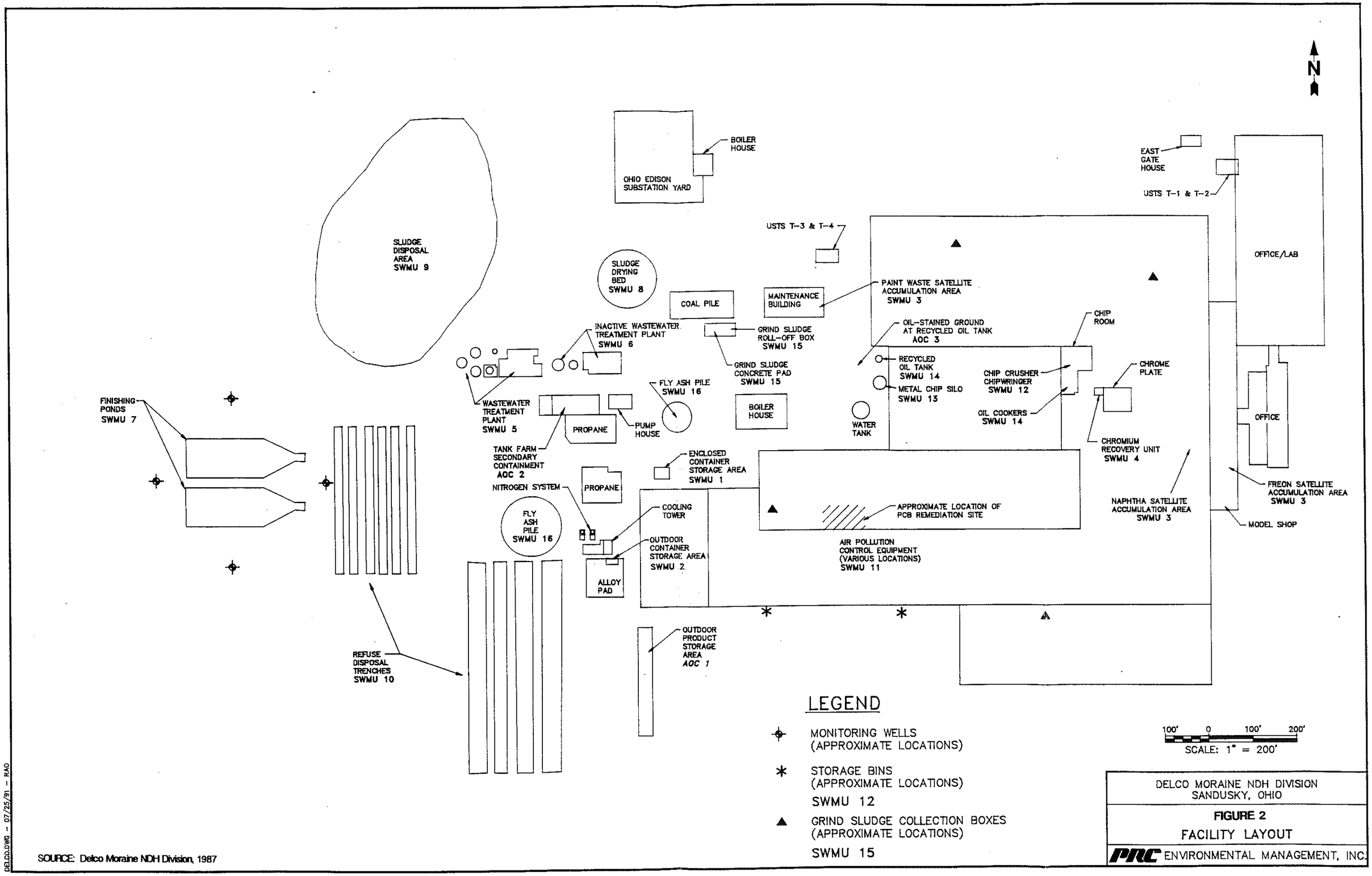
TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Enclosed Container Storage Area	Yes	Undergoing RCRA closure
2	Outdoor Container Storage Area	Yes	Closed in 1988
3	Hazardous Waste Satellite Accumulation Areas	No	Active
4	Chromium Recovery Unit	No	Active
5	Wastewater Treatment Plant	No	Active
6	Inactive Wastewater Treatment Plant	No	Inactive, Taken out of of service in 1986
7	Finishing Ponds	No	Active
8	Sludge Drying Bed	No	Inactive, covered in early 1960s
9	Sludge Disposal Area	No	Inactive, covered in early 1960s
10	Refuse Disposal Trenches	No	Inactive, backfilled in early 1960s
11	Air Pollution Control Equipment	No	Active
12	Metal Chip Storage Bins, Chip Crushers, and Chip Wringer	No	Active
13	Metal Chip Silo	No	Active
14	Oil Cookers and Recycled Oil Tank	No	Active
15	Grind Sludge Collection Areas	No	Active
16	Fly Ash Piles	No	Active

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.



SOURCE: Delco Moraine NDH Division, 1987

SWMUs also include three satellite accumulation areas (SAA) (SWMU 3): one for paint waste (F005/D001), one for spent petroleum naphtha (D001), and one for spent freon (F002).

Chromium from the electroplating line is reclaimed in the chromium recovery unit (SWMU 4). Prior to the installation of the recovery unit in 1980, plating bath and rinse waters were treated in inactive and active on-site wastewater treatment plants (SWMUs 5 and 6). The active wastewater treatment plant (SWMU 5) receives various process wastewaters from facility operations. Treated wastewaters are routed to the finishing ponds before being discharged to Mills Creek. The facility has a National Pollution Discharge Elimination System (NPDES) permit for this outfall to the creek. Solids are dredged from the ponds and disposed at an off-site landfill every 3 to 5 years. Within the next year, the facility plans to discontinue the use of the outfall to Mills Creek, use the on-site treatment plant for pretreatment, and discharge industrial process water to the city of Sandusky sewer system.

The inactive wastewater treatment plant (SWMU 6) was used to treat process waters until 1986, when the currently operating plant (SWMU 5) was installed. SWMU 6 treated plating wastes until 1980, when the chromium recovery unit was installed, and occasionally after that when the recovery unit was out of service. From the late 1940s through the early 1960s, wastewater treatment plant sludges were disposed of on site in the sludge drying bed (SWMU 8) and sludge disposal area (SWMU 9). Treatment plant sludges are now disposed of off site at the Ottawa County Landfill. Solid wastes of unknown types generated on site were disposed of in refuse disposal trenches (SWMU 10) located east and southeast of the finishing ponds. The disposal of solid wastes is estimated to have occurred during the same time period the sludge disposal areas were being operated.

Dusts generated in the machining areas of the plant are collected in air filtration units (SWMU 11) and disposed of off site with grind sludge. Metal chips generated in the machining areas are either directly conveyed into or collected in steel bins and manually fed into either of two chip crushers where the chips are reduced in size; the chips then enter the chip wringer where lubricating oils are removed (SWMU 12). The chips are then conveyed to the chip silo (SWMU 13) and stored until sold as scrap metal. After being separated from the chips, the lubricating oils are heated in either of two oil cookers and transferred to the recycled oil tank (SWMU 14) on the west side of the building. These oils are reused at the facility.

Grinding operations generate grind sludge consisting of metal fines and abrasives. Grind sludge is stored in several areas at the facility (SWMU 15). Grind sludges are collected from the five or six filtration systems and put in metal boxes. The boxes are emptied onto a concrete pad on the west side of the facility. They are transferred to a 10-cubic-yard hopper before being

transported to the Ottawa County landfill. Coal-fired boilers generate fly ash, which is stored in one of two piles (SWMU 16) located on the west side of the facility.

Three AOCs were identified during the inspection. One of these is an outdoor product storage area on the southwest portion of the facility, where 55-gallon drums of bulk oils are stored. Another AOC is product tank farm secondary containment on the west side of the facility. The third AOC is the oil-stained ground surrounding the aboveground recycled oil tank on the west side of the plant.

2.3 WASTE GENERATING PROCESSES

The DMNDH facility routinely generates 11 solid waste streams, four hazardous and seven nonhazardous. Waste streams, EPA waste codes, sources, and SWMUs are listed in Table 2.

Hazardous waste streams include paint waste containing toluene (F005), paint waste containing mineral spirits (D001), spent freon solvent (F002), and spent petroleum naphtha (D001). Paint waste generated from on-site equipment maintenance is accumulated in the maintenance building on the west side of the facility. The DMNDH facility does not paint manufactured items. In 1990, 1,760 pounds of paint waste containing toluene and 704 pounds of paint waste containing mineral spirits were generated at the facility. Freon is used for parts cleaning in the model shop where air bearings are manufactured; it is accumulated in this satellite accumulation area as well. In 1991, 5,760 pounds of spent freon were generated. Spent petroleum naphtha is generated from parts washers used to clean machine parts, tools, and fixtures. The facility uses between 50 and 60 naphtha parts washers that range in size from 2 gallons to 100 gallons. In 1990, 30,624 pounds of spent naphtha were generated at the facility (DMNDH, 1991a). Spent naphtha from all parts washers is stored in one SAA outside the model shop on the east side of the facility before being transferred to the enclosed CSA.

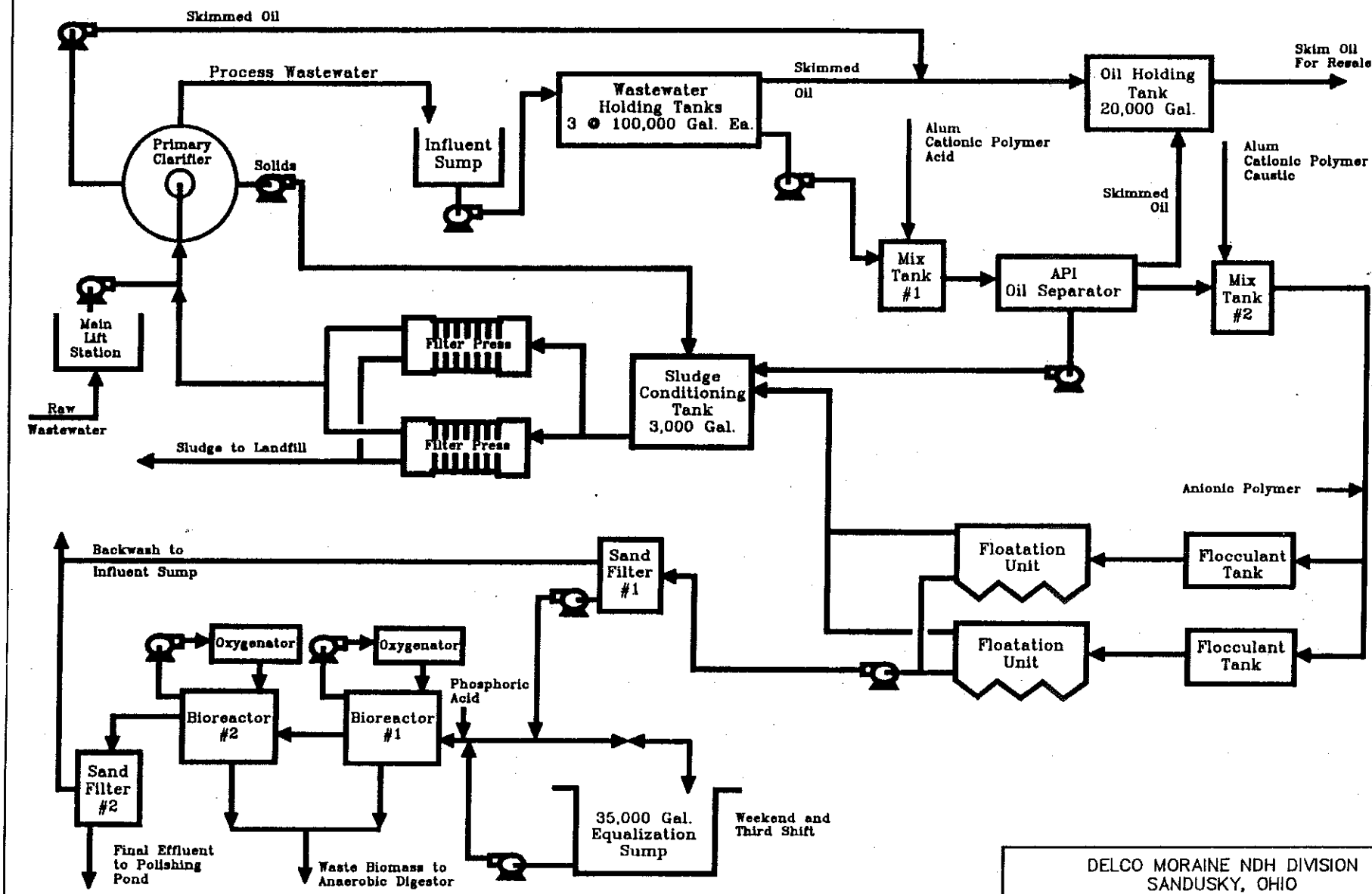
Nonhazardous waste streams include wastewater treatment plant sludge, waste oil, air filtration dust, metal chips, recycled oil, grind sludge, and fly ash. Approximately 10 cubic yards of wastewater treatment plant sludge is generated monthly. The sludge is generated from the treatment of industrial process wastewaters and stormwater from aboveground tank secondary containment areas. Sludge forms after polymers and lime are added to wastewater during the treatment process. Sludge is removed from the treatment plant after being dewatered in the filter presses. A schematic diagram of the wastewater treatment plant process is shown in Figure 3. Waste oils in process wastewaters are removed during the wastewater treatment process; this waste oil is stored in an aboveground tank outside the treatment plant building before being transported off site by an oil recycling company. Samples of the waste oil collected and analyzed

TABLE 2
SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Paint Waste Containing Toluene/F005	On-Site Maintenance Operations	1 and 3
Paint Waste Containing Mineral Spirits/D001	On-Site Maintenance Operations	1 and 3
Spent Freon Solvent/F002	Parts Washing	1 and 3
Spent Petroleum Naphtha/D001	Tool and Fixtures Washing	1 and 3
Wastewater Treatment Plant Sludge	Wastewater Treatment Plant	5
Waste Oil	Wastewater Treatment Plant	5
Air Filtration Dust	Air Pollution Control Equipment	11
Metal Chips	Machining Operations	12 and 13
Recycled Oil	Manufacturing Operations	14
Grind Sludge	Grinding Operations	15
Fly Ash	Boilers	16

Note:

* Primary management unit refers to a SWMU that currently manages the waste.



SOURCE: Delco Moraine NDH Division, 1989.

DELCO MORAINE NDH DIVISION
SANDUSKY, OHIO

FIGURE 3

WASTEWATER TREATMENT PLANT SCHEMATIC DIAGRAM

PRC ENVIRONMENTAL MANAGEMENT, INC.

in September 1990 contained the following hazardous consitutents: 3 milligrams per kilogram (mg/kg) cadmium, 6 mg/kg chromium, and 41 mg/kg lead (Zenon Environmental Laboratories, 1990).

Cartridge-type dust filtration units in the spindle machining areas of the plant filter iron dust and smoke generated at the dry machining lathes. Dust collected in these units is emptied into drums; approximately one 55-gallon drum of dust is generated annually. Lubricating oils used during operations are separated from metal chips, heated in oil cookers, and stored in the recycled oil tank. Metal chips consist of excess steel not used in the manufactured parts; 8,400 tons are generated annually during machining operations. The lubricating oils are used in processing the metals and are thus combined with the metal chips. Oils are recycled, stored in an aboveground tank located outside the building, and reused at the facility in manufacturing operations. Grind sludge is generated in various grinding areas of the plant where manufactured parts are ground and honed; 1,370 tons are generated on an annual basis. Nonhazardous fly ash is generated from burning low sulfur stoker coal in the on-site boilers; 3,000 to 5,000 tons of fly ash are generated annually.

The DMNDH facility generates three nonroutine wastestreams: electroplating waste containing chromium (D007), solids dredged from the finishing ponds, and mercury (D009) generated from the dismantling of plant equipment. Plating wastes are generated at the chromium recovery unit when the unit is not properly functioning. This apparently does not occur on a regular basis. No plating waste was generated during 1990; in 1991, as of the date of the VSI, 1,400 pounds had been generated. Mercury waste is generated from decommissioning steam and air flow meters; it is currently being stored in the enclosed container storage area until a recycler can be found.

As stated previously, the wastewater finishing ponds are dredged every 3 to 5 years. While one pond is being cleaned out, the other receives treated wastewater. The solids removed from the ponds are disposed of off site at the Ottawa County Landfill.

2.4 RELEASE HISTORY

Several releases to various environmental media have occurred at the DMNDH facility. Nine spills have been reported to OEPA Division of Emergency and Remedial Response (DERR). Four of these spills were received by Mills Creek. Releases to on-site soils have occurred as a result of three leaking tanks, two underground storage tanks (UST) containing gasoline or diesel and an aboveground tank containing polychlorinated biphenyl (PCB) oil. Ground water was impacted at one of the leaking UST sites. Remedial activities have been conducted at both of the

leaking tank sites under the guidance of the Ohio State Fire Marshal and OEPA. Additionally, inorganic contaminants were detected in ground-water samples collected in 1981 from the four monitoring wells surrounding the finishing ponds. No piles of excavated soil remain at the former tank locations.

The spills reported to OEPA DERR have mostly involved various types of oils. Table 3 outlines general information regarding these spills. According to a facility representative, the 1991 employee report on contaminated soil listed excavated soil originating from an area where fire training was conducted. The surface soils in this area were apparently stained with oil; the facility collected the soil in roll-off dumpsters and a pile on the west side of the facility near the grind sludge pad, in preparation for off-site disposal (DMNDH, 1991d). In May 1991, composite samples of the soils were collected and analyzed for volatile organic compounds (VOC), extractable organic compounds (EOC), and toxicity characteristic leaching procedure (TCLP) metals. Analytical results show that two of the samples contained Aroclor 1260, a type of PCB, at 4.2 and 3.6 mg/kg. No VOCs or EOCs were detected in any of the samples. Arsenic, barium, cadmium, chromium, lead, and silver were detected in the samples at concentrations below those that would require the waste to be disposed of as hazardous (Aqua Tech Environmental Consultants, 1991). The facility plans to have these soils disposed of off site in a landfill (DMNDH, 1991d).

In addition to the reported releases to Mills Creek, an OEPA Division of Water Pollution Control report indicates that water quality in Mills Creek downstream of DMNDH has been impacted by the facility. According to the report, downstream water samples indicated low dissolved oxygen levels and high ammonia levels, and downstream sediment samples indicated elevated concentrations of cadmium, chromium, lead, zinc, and copper. The report suggests that DMNDH's outfall was responsible for the downstream levels. The reports does not indicate the specific source of the metal contaminants but mentions inadvertent discharges of chromium due to DMNDH's manufacturing techniques (OEPA, no date). The chromium has presumably originated from plating-line wastes. According to a facility representative, cadmium, chromium, and lead found in a waste oil sample in 1990 may have originated from servicing vehicles at the facility (DMNDH, 1991b). This sample was collected from the waste oil tank at the wastewater treatment plant and could therefore be the source of some of the metals in the Mills Creek sediment samples.

In June of 1990, the facility initiated tank removal activities at two UST areas, one on the northeast portion of the property and one on the west. The tanks on the northeast portion were referred to as T-1 and T-2 and contained gasoline and diesel fuel, respectively. Soil and ground-water samples taken in this excavation area did not contain contamination in concentrations that

TABLE 3

SPILLS REPORTED TO OEPA
JANUARY 1978 TO MAY 1991

Date Reported	Type of Material	Quantity Released	Quantity Recovered	Reporting Agency	Affected Waterway	Reported Source
09/18/80	Waste Oil	150 gal	150 gal	Erie County Health Dept.	Mills Creek	Storm sewer
10/19/81	Waste Oil	75 gal	50 gal	Erie County Health Dept.	Mills Creek	Accumulation at outfall
04/12/83	PCB Oil	unknown	unknown	Citizen	None	Ruptured transformer
10/17/84	PCB Oil	2 gal	2 gal	EPA	None	Ruptured capacitor
09/30/85	Soluble Oil	500 gal	unknown	GMCNDH	Mills Creek	Tank truck overfill
09/17/86	Light Oil Suspended Solids Wastewater	100 gal unknown 1 mil gal	99 gal unknown unknown	GMCNDH	Mills Creek	Accident during pond dredging
01/04/90	PCB Oil	unknown	unknown	DMNDH	None	Leaking aboveground tank
01/29/90	PCB Oil	unknown	unknown	Citizen	None	Leaking aboveground tank
04/11/91	Cutting Oil Contaminated Soil	unknown unknown	unknown unknown	Employee	None	Hole inside of building Excavation

Source: OEPA, 1991a

warranted remediation. Soil samples collected from the UST site near the maintenance building, however, were contaminated with total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and xylene at concentrations warranting soil removal. These USTs were reffered to as T-3 and T-4; T-3 was 1,500 gallons in size and T-4 was 1,000 gallons in size (DMNDH, 1990a).

Contaminated soils were removed from the T-3 and T-4 excavation and disposed of off site. A ground-water sample collected from the bottom of the excavation, at a depth of 7 feet, contained 271 milligrams per liter (mg/L) benzene, 375 mg/L toluene, and 378 mg/L ethylbenzene. None of the samples were analyzed for lead. Ground water was pumped from the excavation and resampled; pumping was continued until sampling showed that clean-up levels had been met. Pumped ground water is not currently on site. Soil samples collected from the bottom of the excavation, at 7 feet below the ground surface, indicated that clean-up levels had been achieved, and a representative of the Ohio State Fire Marshal gave DMNDH verbal approval to backfill the excavation (DMNDH, 1991c).

The release of PCB-contaminated oil from a leaking tank occurred in the southwestern portion of the plant. The source of the release was a 5,000-gallon, underground, process tank and connecting underground pipe that contained PCB-contaminated quench oil. The tank had not been used since 1985, but the release was not discovered until January 1990; the date the tank and pipe first started leaking is unknown. The release occurred across 5,500 square feet of production floor space. The tank, piping, and surface concrete were removed, and soil samples were collected in the excavated area.

PCB-contaminated soil was removed from an average depth of 1.5 feet in the excavated area. Soil excavation in the tank and forge foundation areas reached an approximate depth of 9 feet. A total of 1,228 tons of contaminated soil and concrete were removed and disposed of off site. Three monitoring wells were installed to evaluate the possibility that a release to ground water had occurred. The first two ground-water sampling rounds did not show any PCBs above the detection limit of 1 microgram per liter (μg/L). The third sampling round indicated that ground water in one of the wells contained 1 μg/L PCBs. Subsequent sampling did not show any contamination above the detection limit. The last soil samples were collected on June 11, 1990, and OEPA gave verbal approval to backfill the excavation, contingent upon these samples containing less than 25 mg/kg PCBs. Analytical results indicated that the clean-up level had been met. The excavation has been backfilled, a concrete floor has been laid, and the site is now back in use as a production area (DMNDH, 1990b).

Four monitoring wells were installed around the finishing ponds in 1981, at the direction of OEPA. On four different occasions in July 1981, ground-water samples were collected from these wells and analyzed for cyanide, chromium, and cadmium. Analytical results indicate that the highest concentrations detected in these samples were 0.02 milligrams per liter (mg/L) cyanide, 0.11 mg/L chromium, and 0.03 mg/L cadmium (DMNDH, no date). OEPA received copies of the analytical results and informed the facility that the levels were acceptable; OEPA also recommended continued water quality monitoring (OEPA, 1981b). Analytical results of ground-water samples collected in May, June, and September 1983, and January 1984, indicate that cyanide, chromium, and cadmium were not contained in any of the samples (AHE Environment, Inc., 1983, 1984). The specific sampling and analytical methodologies used for any of these samples is not known.

According to the facility representatives, there have been two complaints pertaining to noise generated at the facility. Both of these complaints came from the same resident of the area during stack tests for the boilers in the summers of 1989 and 1990.

2.5 REGULATORY HISTORY

GMCNDH submitted a Part A Hazardous Waste Permit Application on November 14, 1980, indicating that it was a treatment, storage, or disposal (TSD) facility (GMCNDH, 1980). The original Part A application listed process codes for tank storage (T01), wastewater treatment system (T04), and container storage (S01). A Hazardous Waste Facility Installation and Operation Permit (no. 03-22-0464) was issued to the facility by the Hazardous Waste Facility Approval Board (HWFAB) on December 28, 1981 (HWFAB, 1981). In 1982 and 1984, amendments to the Part A application were submitted to update the types and quantities of hazardous wastes stored at the facility and to delete the T01 and T04 process codes. These codes related to the wastewater treatment system (SWMU 6) which is regulated under the NPDES permit and did not need to be included in the Part A.

In 1988, GMCNDH submitted a Notification of Hazardous Waste Site form to EPA under Section 103(c) of CERCLA for the sludge drying bed (SWMU 8) and sludge disposal area (SWMU 9) (GMCNDH, 1988). This notification was filed because F006 treatment plant sludge was deposited in these units. According to facility representatives, no further CERCLA action has been taken by EPA at the facility.

Sometime prior to 1981, the facility submitted a delisting petition to EPA for its F006 wastewater treatment plant sludge generated from plating wastes. EPA granted the facility a temporary exclusion of this waste stream but rescinded the delisting status on March 19, 1986.

Because the delisting status was rescinded, the facility submitted a revised Part A application to obtain interim status for the two treatment plant polishing ponds (SWMU 7) that contained F006 sludge (GMCNDH, 1986). GMC appealed the rescindment and the EPA again granted the temporary delisting status in August 1986. EPA did not, however, grant a final delisting, and the temporary status expired in November, 1986 (U.S. EPA, 1986).

During the period when temporary delisting was revoked, the facility disposed of F006 sludge as hazardous waste. However, according to a facility representative, DMNDH has not handled the treatment plant sludge as F006 hazardous waste since the expiration date of the temporary delisting; the decision to treat the sludge as nonhazardous was based on the presence of the chromium recovery unit (SWMU 4), which was designed to preclude plating waste discharges to the treatment plant (DMNDH, 1991c). Facility representatives also indicated that the chromium recovery unit has occasionally malfunctioned and that plating waste discharges to the treatment plant have occurred at those times. The discharge pipe from the plating line to the treatment plant has recently been plugged to prevent the discharge of plating wastes to the wastewater treatment plant, and when the chromium recovery unit is not functioning, plating wastes are collected in drums at the recovery unit and disposed of off site.

OEPA conducted RCRA compliance inspections in 1981, 1982, 1989, and 1990. During the 1981 inspection, the facility was cited for violations pertaining to warning and "No Smoking" signs and to an inspection schedule (OEPA, 1981a). In 1982, the facility was cited for not listing an expected closure date (OEPA, 1982). During the 1989 inspection, the facility was cited for an inadequate waste analysis plan, inspection schedule and log, and personnel training records (GMCNDH, 1989b). No violations were cited during the 1990 inspection (OEPA, 1990a).

The facility is currently conducting closure activites in order to withdraw its interim status and operate as a large-quantity generator. A closure plan for the outdoor CSA (SWMU 2), also referred to as the old CSA, was conditionally approved in January 1988, and the CSA was certified closed in March 1991. The closure certification indicates that soil contaminated with chromium was removed from the storage pad area and disposed of at the BFI Ottawa County Landfill (DMNDH, 1989). OEPA conducted a closure inspection, reviewed the documents, and approved the closure on April 11, 1991 (OEPA, 1991b).

DMNDH submitted a closure plan for the enclosed CSA (SWMU 1) in October 1988, after an EPA Part B call-in in April, 1988. In September 1989, OEPA disapproved the plan because of deficiencies (OEPA, 1989a). A revised closure plan was submitted in January 1990; this plan was conditionally approved in June 1990. DMNDH, however, appealed the conditions of the approval

and entered into negotiations with OEPA to resolve closure conditions. The facility submitted the latest closure plan on June 21, 1991.

OEPA Division of Air Pollution Control has granted the DMNDH facility 32 operating air permits. These permits are for a vapor recovery system on the gasoline storage facility and various dust and mist filtration units within the plant. The filtration units control dust and vapors generated by lathes, microgrinders, shotblast equipment, mineral oil washer, metal chip crusher, plating line, caustic cleaning tanks, furnaces, boilers, tool welding equipment, bearing roller oil quench, parts washers, bearing washers, and coal handling system. The permit numbers are as follows:

B001	P003	P010	P023	P028	P033	K003
B002	P005	P014	P024	P029	P034	N002
B003	P007	P016	P025	P030	P035	
R002	P008	P020	P026	P031	K001	
P002	P009	P022	P027	P032	K002	

Site representatives indicated that one violation for excess particulates from one of the boilers was cited in 1975; no other violations are known to have been cited. The facility is required to operate continuous opacity monitoring systems (COMS) for boilers 1, 2, and 3 and to report any occurrences of excess opacity to EPA and OEPA on a quarterly basis (DMNDH, 1990c). A performance audit report of the COMS conducted in 1988, indicated that the monitoring equipment had been malfunctioning on a regular basis and that opacity excesses were not being properly recorded (OEPA, 1988). According to a facility representative, these problems have been corrected.

The DMNDH facility also has NPDES permit No. 2IC00011*FD to discharge 675,000 million gallons per day at outfall No. 001, located at river mile 1.6 of Mills Creek. Combined effluent includes sanitary wastewater, process wastewater, noncontact cooling water, boiler blowdown, coal pile runoff, and storm water runoff (OEPA, no date). The NPDES permit is effective from September 30, 1987, to September 27, 1992 (OEPA, 1987). Self-monitoring reports submitted in September 1989, October 1990, and February 1991 revealed violations of NPDES permit conditions for biological oxygen demand, total residual chlorine, ammonia, and copper (OEPA, 1989b; OEPA, 1990b; OEPA, 1991c).

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 DMNDH facility.

2.6.1 Climate

Sandusky, Ohio, experiences temperate weather conditions typical of the midwestern United States. The average annual temperature is between 49.7°F and 52.9°F [U.S. Department of Commerce (U.S. DOC), 1969]. The prevailing wind speed, as reported for Toledo, Ohio, is 9.4 miles per hour, and the wind direction is west-southwest (U.S. DOC, 1989). The 1-year, 24-hour maximum rainfall for the area is approximately 2.25 inches (U.S. DOC, 1963), and the annual net precipitation is approximately 1 inch (U.S. DOC, 1968).

2.6.2 Flood Plain and Surface Water

The majority of the facility is not located in any designated flood zones. A narrow area west of the wastewater treatment plant is designated as Zone B, an area between the limits of the 100-year and 500-year flood plain (Federal Emergency Management Agency, 1981). This narrow area follows the path of the wastewater outfall to Mills Creek, located approximately 2,500 feet west of the facility. Mills Creek flows in a northerly direction towards Lake Erie, where it empties into Sandusky Bay approximately 1.3 stream miles north of the facility. No other surface water bodies have a surface migration pathway from the DMNDH facility.

2.6.3 Geology and Soils

Surface soils on most of the facility property are designated as "made land" soils, indicating that native soils have been removed and the area has been filled. These made land soils are described as having poor physical properties, such as low moisture capacity and low organic matter content. Surrounding the site are soils of the Fulton series, specifically, silty clay loam of the Fulton series. Remnant lacustrine soils occur in the area as low knolls and small ridges within the former lake plain. Typically, these soils are light-colored, moderate to poorly drained, and in profile, consist of approximately 9 inches of silty clay loam overlying approximately 8 inches of clay that overlies approximately 61 inches of silty clay. The water table is high during part of the year, run-off is slow, permeability is very slow, and the available moisture capacity is medium (U.S. Department of Agriculture, 1971).

Regional geologic information available describes the facility area as underlain by thin lake plain sediments (Glacial Lake Erie) overlying Devonian-age Columbus and Delaware limestone and shale bedrock (Bownocker, 1981). Water-well records of wells drilled at the facility indicate 11 to 17 feet of yellow to brown clay directly overlying the limestone bedrock. No glacial sediments occur in the immediate vacinity of the facility. Bedrock in the area is

gently dipping toward the east as a result of the Cinncinnati arch and is comprised of thick sequences of limestone, dolomite, and shale.

Well log information from a well completed at the facility describes 240 feet of limestone underlying the facility. Typically in the facility area, bedrock consist of approximately 60 feet of Devonian-age Columbus limestone disconformably overlying approximately 200 feet of limestones and dolomites of the Monroe formation overlying 100 feet of limestones and dolomites of the Niagara series.

2.6.4 Ground Water

Well logs for wells completed in the bedrock aquifer at the DMNDH facility indicate that the water table exists between 11 and 48 feet below ground surface. The most important aquifer in the facility area is the bedrock aquifer consisting of carbonate units of the Bass Island Group of late Silurian age (Norris, 1971). The Bass Island group corresponds to the Monroe Formation which underlies the facility area. Bedrock wells in the facility area are typically completed 50 to 250 feet below ground surface, depending on water quality and specific yield. Generally, water quality is good, but locally may be highly mineralized and sulfurous in odor.

Hydrogeologic investigations at the facility have been limited to the installation of three shallow monitoring wells. The three wells installed near the leaking UST site show depths to ground water between 8.5 and 10.3 feet. From relative water table elevations for these three wells, ground water flow direction potential was determined to be to the northwest (Samsel Services Company, 1990). However, this conclusion is based on one set of water level measurements and may not accurately reflect overall ground water flow direction. Information on regional ground water resources indicates that yields of more than 500 gallons per minute have been developed at depths of less than 200 feet in limestone in the vicinity of the facility and that domestic supplies are generally obtained at depths of around 100 feet (Walker, 1986).

As discussed in Section 2.4, ground-water contamination was detected at the UST removal site and in the PCB release area, and remedial activities have been performed under the guidance of the Ohio State Fire Marshal and OEPA. Additionally, ground-water samples collected in 1981 from the four monitoring wells surrounding the finishing ponds contained low levels of cyanide, chromium, and cadmium. No ground-water contamination from off-site sources is known to exist at the facility.

2.7 RECEPTORS

Receptors of wastewater discharges into Mills Creek from the DMNDH facility include downstream macroinvertebrate and fish communities; species richness in the benthic community was found to be severely impacted. Diversity declined to 16 different macroinvertebrate taxa, compared to 24 to 29 upstream. Fish diversity declined to 11 species downstream of the facility, compared to 18 upstream (OEPA, 1985). Stream use designations for Mills Creek include warm water habitat, agricultural water supply, industrial water supply, and primary contact recreation (OEPA, date unknown). Locations of these different uses are unknown.

According to a representative of the Erie County Health Department, residents in the vicinity of the facility receive drinking water from the Sandusky municipal water system. The City of Sandusky and parts of unincorporated Erie County use water from Lake Erie taken from a point 0.75 miles offshore. Well logs obtained from Ohio Department of Natural Resources (ODNR) indicate that the well closest to the facility, owned by Brownell Truck Service, is approximately 3,000 feet west of the facility on the west side of Mills Creek. Assuming ground water flow to be northwesterly, this well is upgradient of the site. Additionally, Mills Creek may serve as a ground-water divide between the facility and the Brownell Truck Service well. Other well logs obtained from ODNR are for wells located 3 miles south and southeast of the facility; these locations are upgradient of the facility.

The potential for residents of the area to come into direct contact with on-site hazards is minimal, because the facility is encompassed by a fence and patrolled by 24-hour security guards. The potential for an air release appears to be minimal based on lack of violations the facility has been cited for in the last 17 years. No wetlands or other sensitive environments are known to exist within 2 miles of the facility. Land use in the vicinity is a mixture of commercial, industrial, and residential. The City of Sandusky, a densely populated area, is due north of the facility. There is a high school located at the northeast corner of the intersection of Hayes and Perkins Avenues, and an elementary school is approximately 3,000 feet northwest of the facility, north of Perkins Avenue.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 16 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 release, and PRC observations.

SWMU 1 **Enclosed Container Storage Area**

Unit Description: This unit is used to store hazardous wastes in containers for greater than 90 days. It is a concrete block building with approximate dimensions of 13 feet by 15 feet (see Photograph No. 1). The building is equipped with two steel doors, two-level roller-conveyor storage racks, and roof and wall vents. The unit is designed to contain a maximum of 40 55-gallon drums.

Date of Startup: This unit has been in use since 1985.

Date of Closure: This unit is currently undergoing closure activities as a 90-day hazardous waste container storage area. A modified closure plan was submitted in January 1990, and was conditionally approved by OEPA in May 1990. DMNDH appealed the conditions of the approval and, after negotiating with OEPA, is currently preparing a final closure plan. The facility will continue to use this building as a less than 90-day storage area after closure is conducted and approved.

Wastes Managed: This unit currently stores hazardous wastes generated on site in containers. These wastes include mercury (D009), paint waste containing toluene (F005), paint waste containing mineral spirits (D001), spent petroleum naphtha (D001), and spent freon solvent (F002). Wastes stored in the container storage area in the past included waste paint containing lead (D008); nitric or sulfuric acid, black oxide caustic sludge, "nital" etching solution (D002); sodium nitrate (D003); copper cyanide (P029); waste biocide (D002); and spent 1,1,1-trichloroethane (U226).

Release Controls: The building rests on a bermed, concrete pad. The curbing is 6 inches high and 6 inches wide.

History of Release:	This unit has no known history of release.
Observations:	The container storage building appeared in sound condition. PRC observed no visual evidence of release from this unit. Drums currently stored inside the building appeared in sound condition and were properly labeled.
SWMU 2	**Outdoor Container Storage Area**
Unit Description:	This unit is a 10-foot by 10-foot portion of a concrete pad located on the west side of the facility (see Photograph No. 2). The unit was designed to store a maximum of 20 55-gallon drums.
Date of Startup:	This unit has been in use since 1980.
Date of Closure:	The facility closed this unit in 1989, after submitting a closure plan in November 1987, and receiving closure plan approval in January 1988. This unit was not used after the installation of the enclosed container storage area in 1985. Closure was certified by an independent engineer in March 1991, and approved by OEPA in April 1991.
Wastes Managed:	This unit was used to store hazardous wastes in containers prior to the installation of the enclosed container storage area. It is assumed to have been used for storing the same types of wastes listed for the enclosed container storage area above, but no written record of the wastes stored is available. It is currently used for storing equipment and bulk metal materials.
Release Controls:	This unit has no secondary containment (GMCNDH, 1987).
History of Release:	This unit has no known history of release. It has been certified closed.
Observations:	The old CSA appeared in sound condition; PRC observed no visual evidence of release from this unit. It is currently used for storing equipment.

SWMU 3	**Hazardous Waste Satellite Accumulation Areas**
Unit Description:	This unit consists of three areas at the facility, each used to accumulate up to 55 gallons of hazardous spent solvents before they are transferred to the CSA. One of these areas is in the maintenance building and consists of a fire resistant cabinet measuring 34 inches wide, 5.5 feet high, and 34 inches deep (see Photograph No. 3). It is used to store paint waste generated in the maintenance building. A second area is in the model shop where parts are washed with freon solvent. Spent freon is poured into a 55-gallon drum from 5-gallon dip tank parts washer (see Photograph Nos. 4 and 5). Naphtha is accumulated in 55-gallon drums in an established area inside the plant near the laborers crib (see Photograph No. 6).
Date of Startup:	The dates the facility began using the SAAs are unknown.
Date of Closure:	This unit is currently in use.
Wastes Managed:	This unit manages paint waste containing toluene (F005) and paint waste containing mineral spirits (D001), which are both accumulated in the maintenance building, and spent petroleum naphtha (D001), which is accumulated in the laborers crib area of the plant, outside the model shop.
Release Controls:	The naphtha and freon SAAs have no secondary containment; the paint waste accumulation drums are stored inside metal cabinets. All accumulation areas are inside buildings that have concrete floors.
History of Release:	This unit has no known history of release.
Observations:	The SAAs appeared in sound condition; PRC observed no visual evidence of release. Six full, labelled and dated drums were being stored in the naphtha accumulation area; these should have been transferred to the container storage building.

SWMU 4	**Chromium Recovery Unit**
Unit Description:	This unit is used to reconcentrate chromium from electroplating wastes. It is a Corning brand, process evaporator, chrome recovery unit constructed of borosilicate glass (see Photograph No. 7). It has the capacity to evaporate 75 gallons of waste per hour, it operates at temperatures between 180°F and 190°F, and it vacuum pressures between 10 and 12 inches of water.
Date of Startup:	The chromium recovery unit was installed in 1980.
Date of Closure:	This unit is currently in use.
Wastes Managed:	This unit manages chromium plating wastes. Chromium is recovered in the unit and reused in the plating process.
Release Controls:	This unit is completely enclosed; plating wastes are piped into the unit from the plating line, and wastewaters are piped to the wastewater treatment plant after chromium is recovered. The unit is on a concrete floor inside a room in the plant building. The unit is known to malfunction; chromium plating wastes are collected in drums at the recovery unit when this happens.
History of Release:	This unit has no known history of release.
Observations:	The chromium recovery unit appeared in sound condition; PRC observed no visual evidence of release. No drums of plating waste were observed near the unit.
SWMU 5	**Wastewater Treatment Plant**
Unit Description:	This unit is used to treat industrial process waters and storm water from secondary containment areas across the site. The alkaline and oily treatment system treats wastewaters chemically, mechanically, and biologically to remove oil, solid contaminants, and dissolved contaminants before being discharged to Mills Creek. The treatment system includes a primary clarifier, alkali storage and equalization tanks, an API (American Petroleum Institute)

separator, a skim oil sump, a mix tank, two flocculating tanks, dissolved air flotation units, a sand filter, an oxygenator, a bioreactor, a precoat slurry tank, and a filter press (see Figure 3).

Date of Startup: The wastewater treatment plant was installed in 1986.

Date of Closure: This unit is currently in use.

Wastes Managed: This unit treats industrial process waters generated at the facility. These waters include metal working fluids and washwater from the grinding areas of the plant, light fraction oil and water soluble washing solutions used in the assembly process, miscellaneous floor drain wastes, storm water from bulk storage tank secondary containment areas, and caustic wash solution wastes. Chromium plating wastes were sporadically treated in the wastewater treatment plant until 1991, when the discharge pipe from the plating line was permanently closed. The NPDES permit has discharge limitations established for mercury, copper, zinc, iron, and dissolved hexavalent chromium. The facility was cited for violations of its NPDES permit on two occasions for exceeding copper discharge limits. The treatment plant sludge is disposed of off site as nonhazardous waste; a TCLP analysis indicates concentrations of some metals between 0.02 and 0.34 mg/L.

Release Controls: Wastes are routed from various areas of the facility to the treatment system located in a concrete-floored and concrete-walled building on the west side of the facility. In the event of a tank rupture or large spill in the treatment plant, spilled material would drain to the storm sewer and be routed to the finishing ponds. The released material would then be pumped from the ponds back to the plant for treatment. The oil tanks at the treatment plant are equipped with drains and sumps; spilled oil would collect in the sumps and be pumped into either the primary clarifier for treatment or a tanker truck for off-site disposal. The oil tanks have concrete secondary containment walls as well.

History of Release: The number and nature of releases from the wastewater treatment plant are unknown.

Observations:	PRC observed no visual evidence of release.
SWMU 6	**Inactive Wastewater Treatment Plant**
Unit Description:	This unit was used to treat industrial process waters before the new treatment plant was installed in 1986. It consisted of three concrete reservoirs for storing untreated process wastewater, three concrete reservoirs for storing waste oil skimmed from the wastewater, two concrete sumps, two in-ground concrete clarifiers, an aboveground concrete chromium reduction basin, and aboveground, steel mixing tanks. The three wastewater storage reservoirs are approximately 90,000, 120,000, and 150,000 gallons in size and are predominantly below ground level; they are currently being used temporarily for ion exchange and brine equalization in the active wastewater treatment process. Each of the three oil storage reservoirs have a capacity of 15,000 gallons; these are not in use and are empty except for some amount of rainwater. One of the clarifiers is temporarily being used; the other is empty except for collected rainwater. One of the sumps collects influent wastewater from the manufacturing plant; it is currently in use, and the other is out of service. The aboveground steel mixing tanks have been disposed of. The chromium reduction basin is in place but no longer used.
Date of Startup:	The old wastewater treatment plant was installed in 1947.
Date of Closure:	The treatment plant was taken out of service in 1986, when the new treatment system was installed. Parts of the plant are temporarily in use, as mentioned above.
Wastes Managed:	This unit treated industrial process waters generated at the facility. Wastewaters are assumed to have been the same as those treated now. Plating wastes were routinely treated until 1980, when the chromium recovery unit was installed. Plating wastes were occasionally treated after 1980 because of chromium recovery unit malfunctions.

Release Controls:	The reservoirs are constructed of 12-inch thick concrete and are not lined. Aboveground, steel tanks were located in a concrete-floored building. In 1980, a second finishing pond was installed to prevent direct discharges from the treatment plant to Mills Creek during clean-outs of the single pond.
History of Release:	Releases from this unit occurred to Mills Creek during clean-outs of the original finishing pond before the second pond was installed in 1980. Other releases have occurred through the finishing pond(s). See History of Release for SWMU 7 below. Releases of heavy metals to Mills Creek are suspected from the treatment plant as a result of the facility's operation of electroplating lines. There is no known history of release to on-site soils or ground water from the concrete reservoirs. However, the reservoirs have not been checked for leaks and no sampling has been conducted.
Observations:	The treatment plant is no longer operating; PRC observed no visual evidence of release.
SWMU 7	**Finishing Ponds**
Unit Description:	This unit consists of two finishing ponds that retain treated wastewaters and untreated stormwater from across the site. The capacity of each pond is 1 million gallons, and both are approximately 225 feet long, 80 feet wide, and 5 feet deep (see Photograph No. 9). The ponds discharge wastewater at a rate of 400,000 to 500,000 gallons per day.
Date of Startup:	The first finishing pond was installed in 1971. Prior to 1971, treated wastewater was discharged directly to Mills Creek. Upon the direction of OEPA, the second pond was installed in 1980 to avoid discharging treated wastewater directly into Mills Creek during regular clean-outs of the finishing pond.
Date of Closure:	This unit is currently in use.
Wastes Managed:	This unit stores treated wastewater and untreated stormwater before they are discharged to Mills Creek. Wastewater treatment

plant sludges accumulate in the bottoms of the ponds and are periodically removed. The sludges removed from the ponds in 1986 were manifested off site as hazardous waste during the period when the facility's plating waste delisting status was rescinded. A report of a TCLP analysis conducted on a sludge sample collected in September 1990 indicates that the sludge is nonhazardous and contains low levels of aluminum, barium, copper, molybdenum, strontium, and zinc.

Release Controls: This unit has no secondary containment. The ponds are not lined with either a synthetic material or reworked clay.

History of Release: In 1986, the facility reported to OEPA that 1 million gallons of light oil and heavy solids were released to Mills Creek during pond dewatering operations. At the direction of OEPA, the facility installed four monitoring wells around the ponds in 1981. The locations of these wells are indicated on Figure 2. Samples collected in 1981 indicated low levels of cyanide, chromium, and cadmium in the monitoring well samples. OEPA did not require any remedial activities based upon these results.

Observations: PRC observed an oily sheen in part of the northern finishing pond. Oil from the surface of the ponds is collected with a pump and routed back to the wastewater treatment plant or directly into the waste oil tank.

SWMU 8 **Sludge Drying Bed**

Unit Description: This unit is an area north of the old wastewater treatment plant where treatment plant sludge was temporarily deposited and partly dried. After partial drying, the sludge was transferred to the sludge disposal area. The dimensions of this area are unknown; no records are known to exist regarding the use of this SWMU.

Date of Startup: The date the facility began using the sludge drying bed is unknown; facility representatives assume it to be sometime in the late 1940s.

Date of Closure:	The date the facility stopped using the drying bed is also unknown, but facility representatives estimate it to be sometime during the early 1960s.
Wastes Managed:	This unit was used to dry wastewater treatment plant sludge.
Release Controls:	This unit had no known secondary containment. Facility representatives stated that there is no liner underneath the drying bed but that native clays exist.
History of Release:	This unit has no known history of release. No sampling has been conducted to make this determination.
Observations:	The sludge drying bed is currently not discernible as such. The area is level with the surrounding ground surface and is covered with loose gravel. PRC observed no visual evidence of release.
SWMU 9	**Sludge Disposal Area**
Unit Description:	This unit is an area north of the old wastewater treatment plant approximately 3 to 4 acres in size and 8 feet deep (GMCNDH, 1988). This area is suspected to have been used for permanent disposal of wastewater treatment plant sludge.
Date of Startup:	The date the facility began using the sludge disposal area is unknown; facility representatives estimate it to be sometime in the late 1940s.
Date of Closure:	The date the facility stopped using the sludge disposal area is also unknown; facility representatives estimate it to be sometime in the early 1960s.
Wastes Managed:	This unit presumably managed only wastewater treatment plant sludge.
Release Controls:	This unit had no known secondary containment. Facility representatives assume that no liner was installed underneath the disposal area.

History of Release:	This unit has no known history of release. No sampling has been conducted to make this determination.
Observations:	The sludge disposal area is not discernible as such. It is a mounded area covered with grassy vegetation.
SWMU 10	**Refuse Disposal Trenches**
Unit Description:	This unit consists of trenches dug in two areas on the west side of the facility. The trenches were used for the disposal of wastes generated at the facility. According to a site representative, the facility has no records of types of wastes disposed of in this SWMU. The size of the disposal area is unknown.
Date of Startup:	The date the facility began using the disposal trenches is unknown.
Date of Closure:	The date the facility stopped using the disposal trenches is also unknown.
Wastes Managed:	The types of wastes managed by this unit is unknown, but facility representatives assume that general trash generated at the plant was deposited in this area.
Release Controls:	This unit had no known secondary containment.
History of Release:	This unit has no known history of release. No sampling has been conducted to make this determination.
Observations:	PRC observed no visual evidence of the existence of the disposal trenches. The trenches were filled and the area is now used for storing coal and fly ash.

SWMU 11	**Air Pollution Control Equipment**
Unit Description:	This unit consists of seven air filtration units used to filter particulate matter generated at the dry machining lathes and grinders. These dust filters range in capacity from 1,000 cubic feet per minute (cfm) to 6,000 cfm.
Date of Startup:	The date the facility began using air filtration units is unknown.
Date of Closure:	This unit is currently in use.
Wastes Managed:	This unit manages dust generated from machining steel bearing components and carbide tools. According to a facility representative, only one drum of dust is generated annually from all the units combined. This dust is collected in a 55-gallon drum, is deposited on the concrete pad on the west side of the facility, and is disposed of off site with the grind sludge.
Release Controls:	The air pollution control equipment is completely enclosed. Filters are changed in the units every 2 years and disposed of with general trash.
History of Release:	This unit has no known history of release.
Observations:	PRC observed no visual evidence of release from the air filtration units.
SWMU 12	**Metal Chip Storage Bins, Chip Crusher, and Chip Wringer**
Unit Description:	This unit consists of rectangular, welded, steel bins used to collect some of the metal chips generated in the machining areas, the two chip crushers, where the metal chips are cut, and the chip wringer, where lubricating oils are separated from the chips. The bins vary from 1 to 2.5 cubic yards in size, with average dimensions of 4 feet wide, 6 feet long, and 3 feet high. The chip crushers each have capacities of 6,000 pounds.

Date of Startup:	The facility installed one of the chip crushers in 1973 and the other in 1980; the chip wringer was installed in 1973. The facility began using metal chip storage bins in 1979.
Date of Closure:	This unit is currently in use.
Wastes Managed:	This unit stores and treats excess steel generated as chips in the machining areas of the facility. The metal chips are sold as scrap metal to a recycler after being processed on site.
Release Controls:	This unit has no secondary containment.
History of Release:	This unit has no known history of release.
Observations:	The bins, crushers, and wringer appeared in sound condition; PRC observed no visual evidence of release.
SWMU 13	**Metal Chip Silo**
Unit Description:	This unit consists of a silo used to store metal chips after they are processed in the chip crusher and separated from the lubricating oils. It is an aboveground, steel tank with a diameter of 15 feet and a capacity of 2,500 cubic feet (see Photograph No. 10). It is located on the west side of the facility, outside the component store room near the water tank.
Date of Startup:	The metal chip silo was installed in 1979.
Date of Closure:	This unit is currently in use.
Wastes Managed:	This unit stores processed metal chips that are sold as scrap metal.
Release Controls:	This unit has no secondary containment.
History of Release:	This unit has no known history of release.
Observations:	This unit appeared in sound condition; PRC observed no visual evidence of release.

SWMU 14	**Oil Cookers and Recycled Oil Tank**
Unit Description:	This unit consists of a two 500-gallon and one 1,000-gallon enclosed, steel, cooker tanks, and one 12,000-gallon steel, aboveground tank used to stored reclaimed lubricating oil. The reclaimed oil is pumped to the tank from the oil cookers located inside the building near the chip crusher. The tank is located on the west side of the facility adjacent to the metal chip silo (see Photograph No. 10).
Date of Startup:	The recycled oil tank was installed in 1979. The date the oil cookers were installed is unknown.
Date of Closure:	This unit is currently in use.
Wastes Managed:	This unit reclaims and stores lubricating oils used in the machining operations at the plant. All of the reclaimed oil is reused at the facility.
Release Controls:	The oil cookers are contained inside a concrete-floored and concrete-walled room inside the plant. The storage tank has a concrete, secondary containment wall 35-feet long, 17-feet wide, and 5-feet high; the secondary containment around the tank has no floor.
History of Release:	This unit has no known history of release.
Observations:	This unit appeared in sound condition during the inspection; however, PRC observed stains in the area around the secondary containment wall.

SWMU 15	**Grind Sludge Collection Areas**
Unit Description:	This unit consists of welded steel boxes ranging from 1 to 2.5 cubic yards used to collect grind sludge generated in the grinding areas of the plant. Average dimensions of the steel boxes are 4 feet wide, 6 feet long, and 3 feet high (see Photograph Nos. 11 and 12). The facility has approximately five grind sludge collection boxes throughout the plant. The boxes are emptied onto a concrete pad on the west side of the facility, which is also used for staging other nonhazardous wastes (see Photograph No. 13). Grind sludge is then transferred into a 20-cubic-yard roll-off box owned by Browning Ferris Industries (BFI). The roll-off box is 22 feet long, 8 feet wide, 3 feet high, and is located on the concrete pad (see Photograph No. 13). Grind sludge is stored here until it is picked up by BFI for off-site disposal at the Ottawa County Landfill.
Date of Startup:	The concrete pad was installed in 1971. The date the facility began collecting grind sludge in metal boxes is unknown, but the start date for the roll-off box is presumably the same as the concrete pad.
Date of Closure:	This unit is currently in use.
Wastes Managed:	This unit manages grind sludge; the sludge consists of metal fines and abrasives mixed with metal working fluids used for lubrication and cooling during machining operations.
Release Controls:	This unit has no secondary containment. The metal boxes are kept inside the plant building. The concrete pad and hopper are outside; the pad is not bermed.
History of Release:	This unit has no known history of release.
Observations:	The metal boxes in the plant appeared in sound condition, as did the 20-cubic-yard hopper. Housekeeping appeared inadequate at the concrete pad; waste materials had migrated off the pad onto surrounding gravel areas. Storm water runoff from the pad appears to drain into a storm drain located at the base of the pad.

SWMU 16	**Fly Ash Piles**
Unit Description:	This unit consists of two areas used to store fly ash generated from the three boilers. Dimensions of the piles are unknown. One pile is located west of the boiler house and east of the tank farm. The other pile is located west of the alloy pad and south of the wastewater treatment plant. Approximately 3,000 to 5,000 tons of fly ash are disposed of annually.
Date of Startup:	The coal-fired boilers were installed in 1949. It is assumed that the facility began storing fly ash at these locations at that time.
Date of Closure:	This unit is currently in use.
Wastes Managed:	This unit manages fly ash generated from burning low sulfur stoker coal in on-site boilers. Fly ash appears to be the only waste managed in these piles.
Release Controls:	This unit has no secondary containment. The fly ash piles are not covered.
History of Release:	This unit has no known history of release.
Observations:	The piles were not covered and fly ash was blowing off the piles.

4.0 AREAS OF CONCERN

PRC identified three AOCs during the PA/VSI. These are discussed below.

AOC 1 **Outdoor Product Storage Area**

Containers of bulk product are stored in 55-gallon drums on a portion of a paved area on the southwest portion of the facility. Specific contents of the containers are unknown; according to a facility representative, most of the drums contain cutting, grinding, lubricating, and hydraulic oils (DMNDH, 1991). The drums are stored horizontally on three-tiered metal racks in a concrete area 237 feet long and 27.5 feet wide (see Photograph No. 14). A 4-inch curb surrounds the pavement directly underneath the racks. The date the facility began using this product storage area is unknown; it is currently in use. This area has no known history of release. PRC observed no visual evidence of release during the inspection. The bermed concrete beneath the storage racks did not appear to be wide enough to collect spilled material from a drum, should leaks develop.

AOC 2 **Tank Farm Secondary Containment**

Ten raw material storage tanks (T1 through T10) are located on the west side of the facility, south of the wastewater treatment plant. All tanks are constructed of steel and are 12,000 gallons in size. T1 and T2 contain naphtha solvent "b" and "tellus 22 oil," respectively; these two tanks have a secondary containment wall separate from the rest of the tanks. The concrete wall around T1 and T2 is 30 feet wide, 40 feet long, and 4 feet high, and its capacity exceeds 34,000 gallons. T3 through T10 contain various hydraulic and process oils. The concrete wall around these tanks is 108 feet long, 40 feet wide, and 4 feet high; its capacity exceeds 120,000 gallons. Neither of the containment areas has a floor. The date the facility began using the tank farm and the secondary containment structures is unknown; the tank farm is currently in use. The tank farm has no known history of release from the secondary containment areas. During the inspection, PRC observed ponded rainwater in both of the containment areas; PRC observed an oily sheen on the water in the T3 through T10 area.

AOC 3 **Oil-Stained Ground at Recycled Oil Tank**

The recycled oil tank contains oils wrung from metal chips. The ground around the tank was observed to be heavily stained during the inspection (See Photograph No. 10). The source of the stains is unknown, but they could be the result of accidental spills during loading of oil onto trucks or other means of moving the oil to various parts of the facility. The facility reported one spill to OEPA in 1985, claiming that the spill was the result of overfilling a tank truck from a storage tank; this spill could have occurred at the recycled oil tank.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 16 SWMUs and three AOCs at the DMNDH facility. Background information on the facility's location, operations, waste generating processes, release history, 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, release history, 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 and AOC. Table 3 identifies the SWMUs and AOCs at the DMNDH facility and suggested further actions.

SWMU 1 **Enclosed Container Storage Area**

Conclusions: No releases are known to have occurred from this SWMU. The facility is currently preparing a closure plan for this unit. The determination of whether a release has occurred will be addressed during closure activities. The potential for release to ground water, surface water, and on-site soils appears to be low, based on the presence of a secondary containment wall around the CSA. The potential for release to air is low because the drums are stored closed.

Recommendations: This unit is undergoing RCRA closure; no further action is recommended at this time.

SWMU 2 **Outdoor Container Storage Area**

Conclusions: Soils in the outdoor CSA that were contaminated with chromium were removed and disposed of off site. No releases to ground water are known to have occurred from this SWMU. The unit has been certified closed and closure has been approved by OEPA. The potential for release to ground water, surface water, air, and on-site soils is low because wastes are no longer stored in this area and contaminated soils have been removed.

Recommendations: This unit has been certified closed; no further action is recommended at this time.

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TABLE 4
SWMU AND AOC SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Enclosed Container Storage Area	1985 to present	None	No further action--currently undergoing closure
2. Outdoor Container Storage Area	1980 to 1989	Chromium-contaminated soils were removed during closure	No further action--this unit is closed
3. Hazardous Waste Satellite Accumulation Areas	Unknown	None	Move full drums to CSA
4. Chromium Recovery Unit	1980 to present	None	None
5. Wastewater Treatment Plant	1986 to present	One reported oil release to Mills Creek	Sediment sampling in Mills Creek
6. Inactive Wastewater Treatment Plant	1947 to 1986	Three reported oil releases to Mills Creek	Sediment sampling in Mills Creek and soil sampling below reservoirs
7. Finishing Ponds	1971 and 1980 to present	None	Sludge and monitoring well sampling
8. Sludge Drying Bed	1940s to 1960s	None	Soil sampling
9. Sludge Disposal Area	1940s to 1960s	None	Soil sampling
10. Refuse Disposal Trenches	Unknown	None	Soil sampling
11. Air Pollution Control Equipment	Unknown	None	None
12. Metal Chip Storage Bins, Chip Crushers, and Chip Wringer	1979 to present; 1973 and 1980 to present	None	None
13. Metal Chip Silo	1979 to present	None	None

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14. Oil Cookers and Recycled Oil Tank	1979 to present	None	Inspect for leaks
15. Grind Sludge Collection Areas	1971 to present	None	None
16. Fly Ash Piles	1949 to present	Blowing ash	Cover or wet-down piles

AOC	Operational Dates	Evidence of Release	Suggested Further Action
1. Outdoor Product Storage Area	Unknown	None	Soil sampling
2. Tank Farm Secondary Containment	Unknown	Oil sheen in T3-T10 Area	Soil sampling
3. Oil-Stained Ground at Recycled Oil Tank	Unknown	Oil stains on ground	Soil sampling

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SWMU 3 **Hazardous Waste Satellite Accumulation Areas**

Conclusions: No releases are known or suspected to have occurred from the SAAs. The potential for release to ground water, surface water, air, and on-site soils is low because all the SAAs are inside the plant on a concrete floor. All accumulation drums appeared in sound condition. The potential for release to air is low because drums are stored closed.

Recommendations: No further action is recommended at this time. However, the facility should move all full drums of spent naphtha to the CSA in order to be in compliance with RCRA regulations.

SWMU 4 **Chromium Recovery Unit**

Conclusions: No releases are known or suspected to have occurred from this SWMU. The potential for release to ground water, surface water, air, and on-site soils is low because this SWMU is located inside the building on a concrete floor.

Recommendations: No further action is recommended at this time.

SWMU 5 **Wastewater Treatment Plant**

Conclusions: The potential for release to ground water, air, and on-site soils is low, because the treatment plant is contained within a concrete building and the treated wastewaters are discharged to Mills Creek. The facility has been cited for violations of its NPDES permit, and elevated concentrations of cadmium, chromium, lead, copper, and zinc have been detected in downstream sediment samples. Cadmium, chromium, and lead are constituents of waste oil the facility separates from process wastewaters and stores in a tank associated with the treatment plant. The potential for release to surface water appears to be high, based on this information.

Recommendations: Sediment samples should be collected upstream, downstream, and at the point of entry of the DMNDH outfall to Mills Creek. These samples should be analyzed for those metals previously detected in order to evaluate the extent of contamination caused by releases from the wastewater treatment plant. The source of these metals in the waste oil

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and the treatment plant discharge should be pinpointed to prevent potential continued releases.

SWMU 6 **Inactive Wastewater Treatment Plant**

Conclusions: Chromium was possibly a constituent of the treated discharged water prior to the installation of the chromium recovery unit. The potential for release to ground water and on-site soils from the inground reservoirs is moderate because of the age of the reservoirs. Cracks could have developed in the concrete and wastewater and waste oil could have seeped out the bottom. The current potential for release to surface water and air is low because the unit is no longer in operation.

Recommendations: The recommendations for the active treatment plant also apply to the inactive plant, because sampling sediment from Mills Creek may reflect releases that occurred from the old treatment plant. Additionally, because of the possibility that the reservoirs have leaked, soil samples should be collected from below the reservoirs and analyzed for heavy metals.

SWMU 7 **Finishing Ponds**

Conclusions: One documented release to Mills Creek occurred from this SWMU in 1986 during pond dredging activities. Sludges dredged in 1986 were shipped off site as hazardous waste. Low levels of cyanide, chromium, and cadmium were detected in samples collected from monitoring wells surrounding the ponds in 1981. The wells are not known to have been sampled since 1984. The potential for release to the bedrock aquifer appears to be low because of the presence of a 15-foot clay layer in the area, as shown in the monitoring well logs. However, the extent of the clay is not fully documented and shallow aquifers may exist. The potential for release to surface water and on-site subsurface soils is high, based on the history of releases into Mills Creek from the treatment plant and the potential that treatment plant sludges have contained hazardous constituents. The potential for release to air is low; there is no evidence that volatile compounds are a constituent of treated wastewaters.

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Recommendations: Based on the presence of metals in Mills Creek and the history of releases into the creek, the pond sludge should be sampled and analyzed for suspected contaminants. Additionally, because the monitoring wells have not been sampled since 1984, samples should be collected and analyzed to evaluate current ground-water conditions.

SWMU 8 **Sludge Drying Bed**

Conclusions: The sludge drying bed was used from the late 1940s through the early 1960s for the temporary storage of industrial wastewater treatment plant sludge. Very little is known about the sludge drying bed, and no sampling has been conducted in this area. The potential for release to on-site soils and ground water is moderate because of the possibility that sludges contained heavy metals and the drying bed is not lined. The potential for release to surface water is low because Mills Creek is approximately 2,500 feet away and no surface water pathway exists to the creek from the sludge drying bed area. The potential for release to air is low because the drying bed is no longer in use, and the area is covered with gravel.

Recommendations: Because the nature of the drying bed sludge is not known, soil sampling is recommended in this area to determine whether hazardous constituents have leached out of the sludge. Because the facility operated an electroplating line, the sludge may have contained heavy metals. If subsurface soils are found to be contaminated, ground-water sampling should also be conducted.

SWMU 9 **Sludge Disposal Area**

Conclusions: The characteristics of the sludge disposed of in this area are not known. This unit has been reported under Section 103(c) of CERCLA, and no sampling has been conducted to determine if hazardous constituents have migrated to surrounding soils or ground water. The potential for release to on-site soils and ground water is moderate, because the unit has no secondary containment. The potential for release to surface water is low because Mills Creek, the nearest surface water body, is approximately 2,500 feet away and no surface water pathway to the creek exists. The potential for release to air is low because the disposal area is no longer used, and it is covered with soil and vegetation.

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Recommendations: Surface and subsurface soil sampling should be conducted in the sludge disposal area to determine the nature of the sludge and whether releases have occurred. If heavy metals were contained in the sludge, remedial measures may need to be taken to reduce the risk this SWMU may pose. If subsurface soils are contaminated, ground-water sampling should be conducted as well.

SWMU 10 **Refuse Disposal Trenches**

Conclusions: Very little is known about the refuse disposal trenches on the west side of the facility. The facility made rough estimates of the areal dimensions of these trenches on a facility layout map. The type of wastes deposited in the trenches is unknown and only estimated to be general trash from the facility. The potential for release to on-site soils and ground water is moderate, based on the probable absence of any secondary containment measures and the possibility that hazardous wastes were deposited in the trenches. The potential for release to surface water is low because of the absence of a migration pathway to Mills Creek, the nearest water body. The potential for release to air is low because the trenches have been filled.

Recommendations: Because of the age of these trenches and the possibility that hazardous materials were deposited in them, subsurface soil sampling is recommended in this area. If these samples indicate that contamination exists, ground-water sampling should also be conducted.

SWMU 11 **Air Pollution Control Equipment**

Conclusions: No releases to ground water, surface water, air, or on-site soils are known or suspected to have occurred from this SWMU.

Recommendations: No further action is recommended at this time.

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SWMU 12 **Metal Chip Storage Bins, Chip Crushers, and Chip Wringer**

Conclusions: No releases to ground water, surface water, air, or on-site soils are known or suspected to have occurred from this SWMU.

Recommendations: No further action is recommended at this time.

SWMU 13 **Metal Chip Silo**

Conclusions: No releases to ground water, surface water, air, or on-site soils are known or suspected to have occurred from this SWMU.

Recommendations: No further action is recommended at this time.

SWMU 14 **Oil Cookers and Recycled Oil Tank**

Conclusions: No releases to ground water, surface water, air, or on-site soils are known or suspected to have occurred from this SWMU, but significant oil stains were observed on the ground around the tank. The source of these stains is unknown.

Recommendations: Because of the presence of stains around the tank area, the integrity of the tank should be evaluated. If leaks in the tank are detected, the tank should be repaired or replaced. No further action is recommended for the oil cookers because these are contained inside the building on a concrete floor.

SWMU 15 **Grind Sludge Collection Areas**

Conclusions: No releases to ground water, surface water, air, or on-site soils are known or suspected to have occurred from this SWMU. Sludge is disposed of as special waste off site at the Ottawa County Landfill. Although housekeeping at the concrete pad is inadequate, no hazardous constituents are known to exist in the grind sludge and releases to on-site soils, ground water, surface water, and air are therefore not likely.

Recommendations: No further action is recommended at this time.

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SWMU 16 **Fly Ash Piles**

Conclusions: No releases to ground water, surface water, air, or on-site soils are known or suspected to have occurred from this SWMU.

Recommendations: No further action is recommended at this time.

AOC 1 **Outdoor Product Storage Area**

Conclusions: This area is used to store 55-gallon drums of bulk materials used in facility operations. The specific contents of the drums are unknown. The drums are stored horizontally on metal racks and have inadequate secondary containment. The potential for release to on-site soils and ground water is moderate because of the possibility that contents of a leaking drum may migrate to adjacent unpaved areas. The potential for release to surface water is low because of the absence of a migration pathway to Mills Creek, the closest water body. The potential for release to air is low, assuming that no volatile organic chemicals stored in drums have leaked.

Recommendations: Because of the possibility that drums have leaked or that other spills have occurred and secondary containment is inadequate, surface soil sampling should be conducted in adjacent unpaved areas.

AOC 2 **Tank Farm Secondary Containment**

Conclusions: The tank farm consists of 10 12,000-gallon tanks used to store naphtha solvent and various types of hydraulic and process oils. An oily sheen was observed in the secondary containment area around tanks T3 through T10. Based on the presence of leaked product and the lack of a floor in the secondary containment area, the potential for release to on-site soils and ground water is moderate. The potential for release to surface water is low because of the absence of a migration pathway to Mills Creek. The potential for release to air is low because the naphtha tank appeared in sound condition, and none of the other tanks contain volatile constituents.

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Recommendations: Because of the presence of leaked product in the T3 through T10 secondary containment area, soil samples should be collected in this area to determine whether a release to on-site soils has occurred. If subsurface contamination is detected, ground-water sampling should be conducted to evaluate whether a release to ground water has occurred.

AOC 3 **Oil-Stained Ground at Recycled Oil Tank**

Conclusions: The area surrounding the recycled oil tank on the west side of the facility is heavily stained with oil. These stains have most likely occurred during unloading operations. Because of the lack of secondary containment in the stained areas, the potential for release to on-site soils and ground water is moderate. The potential for release to surface water is low because of the absence of a migration pathway to Mills Creek. The potential for release to air is low because the recycled oil does not contain volatile constituents.

Recommendations: Oil-contaminated soils in the area around the recycled oil tank should be sampled to evaluate the constituents of the released material. Measures should be taken to prevent spills in this area.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OHD	001 880 442

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Delco Moraine New Departure Hyatt Division	2509 Hayes Avenue				
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Sandusky	OH	44870	Erie	043	
09 COORDINATES: LATITUDE 41° 26' 00.0"	LONGITUDE 82° 42' 55.0"				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

From State Rts. 2, exit Hayes Avenue north. Take Hayes approximately 2 miles to facility on west side of Hayes, just south of Perkins Avenue.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
General Motors Corporation	Same		
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
			( )
07 OPERATOR *(If known and different from owner)*	08 STREET *(Business, mailing, residential)*		
Delco Moraine New Departure Hyatt Division	Same		
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
			( )

13 TYPE OF OWNERSHIP *(Check one)*

☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☒ A. RCRA 3010 DATE RECEIVED: 11 / 14 / 80 (MONTH DAY YEAR) ☒ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: 10 / 17 / 88 (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 4 /25 /91
☐ NO

BY *(Check all that apply)*
☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*	03 YEARS OF OPERATION
☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN	1945 | present (BEGINNING YEAR ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Heavy metals may be present in wastewater treatment plant sludge disposal areas. Disposal trenches used in the past contain unknown types of waste. No sampling has been conducted in these areas.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Ground water is not used down gradient of facility. Discharges to Mills Creek have occurred over the years through the facility's outfall.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☒ B. MEDIUM *(Inspection required)* ☐ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Julie Kaiser		PRC EMI	(312) 856-8700	4 / 5 / 91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OHD	001 880 442

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ■ A. SOLID
- □ B. POWDER, FINES
- ■ C. SLUDGE
- □ D. OTHER _____ *(Specify)*
- □ E. SLURRY
- ■ F. LIQUID
- □ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TON _____

CUBIC YARDS unknown

NO. OF DRUMS 102 per year*

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ■ A. TOXIC
- □ B. CORROSIVE
- □ C. RADIOACTIVE
- ■ D. PERSISTENT
- □ E. SOLUBLE
- □ F. INFECTIOUS
- ■ G. FLAMMABLE
- ■ H. IGNITABLE
- □ I. HIGHLY VOLATILE
- □ J. EXPLOSIVE
- □ K. REACTIVE
- □ L. INCOMPATIBLE
- □ M. NOT APPLICABLE

* Quantity based on 1990 Annual Hazardous Waste Report.

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	unknown		Wastewater treatment plant (WWTP) sludge disposed on site.
OLW	OILY WASTE	unknown		Waste oil in WWTP tank.
SOL	SOLVENTS	102 drums	per year	Naphtha, freon and paint related waste solvents.
PSD	PESTICIDES	-		
OCC	OTHER ORGANIC CHEMICALS	-		
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	unknown		Contained in waste oil.

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SOL	Petroleum naphtha (benzin)	8030-30-6	55-gal drums/off site	unknown	
SOL	Freon solvent	76-13-1	55-gal drums/off site	unknown	
SOL	Toluene	108-88-3	55-gal drums/off site	unknown	
SOL	Mineral spirits	8030-30-6	55-gal drums/ off site	unknown	
OLW	Waste oil containing:				
	cadmium	7440-43-9	Waste oil tank/off site	3.0	mg/Kg
	chromium	7440-47-3	Waste oil tank/off site	6.0	mg/Kg
	lead	7439-92-1	Waste oil tank/of site	41.0	mg/Kg

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	None		FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Delco Moraine NDH Division 1990 Generator Annual Hazardous Waste Report (Ohio EPA), 2/11/91. VSI conducted 4/25/91 by PRC.
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POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE OHD	02 SITE NUMBER 001 880 442

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION — 02 ☒ OBSERVED (DATE: 7/2/90) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 0 — 04 NARRATIVE DESCRIPTION

Benzene, toluene, and ethylbenzene were detected in ground water at 7 feet below the surface in underground storage tank removal area. Contaminated soil and ground water has been removed from this site. Potential for ground-water contamination exists from previous WWTP sludge disposal sites, finishing ponds, refuse disposal trenches, and oil and product spill areas.

01 ☒ B. SURFACE WATER CONTAMINATION — 02 ☒ OBSERVED (DATE: various) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: unknown — 04 NARRATIVE DESCRIPTION

Several oil spills into Mills Creek have been reported since 1978 from the storm sewer and WWTP finishing ponds. Elevated levels of cadmium, chromium, lead, zinc, and copper have been detected downstream in Mills Creek. Population using the creek is unknown; it is assumed that it is not used for anything other than recreational purposes.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 0 — 04 NARRATIVE DESCRIPTION

The facility is permitted for boilers, furnaces, grinders, caustic cleaning tanks, chrome plating line, parts washers, and an oil quench unit. The facility was cited in 1975 for excess particulate from one of the boilers. Potential for release appears to be minimal based on lack of violations since 1975.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 0 — 04 NARRATIVE DESCRIPTION

No fire or explosive conditions have been observed or alleged.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 0 — 04 NARRATIVE DESCRIPTION

The potential for direct contact is very limited because the site is secured by a fence and has a 24-hour surveillance system.

01 ☒ F. CONTAMINATION OF SOIL — 02 ☒ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: ~ 9.2 (Acres) — 04 NARRATIVE DESCRIPTION

Soils have been contaminated at sites of underground leaking tanks; these soils have been removed. The current potential for soil contamination exists in sludge and refuse disposal areas and product storage areas at the facility. The area potentially affected is approximately 388,000 $ft.^2$, the total area of disposal trenches, sludge disposal areas, and product storage areas with inadequate containment.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 0 — 04 NARRATIVE DESCRIPTION

There are no known ground-water targets downgradient (north) of the facility. The City of Sandusky and parts of unincorporated Eric County are served by a Lake Erie intake 0.75 miles off-shore from Sandusky.

01 ☒ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: ~ 2,000 — 04 NARRATIVE DESCRIPTION

Workers could be exposed to potentially contaminated soils. Management of hazardous wastes appears to be adequate enough to limit potential exposures to drummed wastes.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: unknown — 04 NARRATIVE DESCRIPTION

Potential population exposure through B. above.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE OHD	02 SITE NUMBER 001 880 442

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☒ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

The potential exists for flora of Mills Creek to be adversely affected by discharges from the outfall.

01 ☒ K. DAMAGE TO FAUNA — 02 ☒ OBSERVED (DATE: 10/85) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

Species richness in fish and macroinvertebrates were found to decline in Mills Creek downstream of the facility in a 1985 OEPA assessment. Dissolved oxygen was low, ammonia was high, and heavy metals were elevated in samples collected downstream of the facility.

01 ☒ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

The aquatic food chain could be contaminated through surface water contamination (see J and K above).

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: unknown — 04 NARRATIVE DESCRIPTION

WWTP sludge disposal areas, refuse disposal trenches, and product storage areas do not have adequate containment. Run-off to storm sewers, holding ponds, and Mills Creek could occur.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

No damage to off-site property is known or suspected to have occurred.

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS — ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

Oil spills have occurred into on-site storm drains. The facility operates an alkaline and oily wastewater treatment plant. This will be used as pretreatment and the facility will discharge to the city sewer sometime within the next year. The facility currently discharges to Mills Creek.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

No illegal or unauthorized dumping is known to have occurred.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

The facility has collected and disposed of "construction debris" from the southwest corner of the site, that contained PCBs below 5 ppm. Oil stains are evident in other areas of the site (e.g. near recycled oil tank).

III. TOTAL POPULATION POTENTIALLY AFFECTED: ~ 2,000

IV. COMMENTS

The total population potentially affected only includes on-site workers. Those people using Mills Creek, if any, should be added when this information becomes available.

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Phone conversation between J. Kaiser, PRC, and John Berent, DMNDH, 6/13/91 and 7/17/91; OEPA, Pollution Incidents for January 1978 through May 1991, EROPIK printout, 6/21/91; OEPA, Mills Creek Water Quality Environmental Assessment, 10/3/85; VSI conducted 4/25/91 by PRC; phone conversation between J. Kaiser, PRC, and Sandusky Water Treatment Plant, 7/16/91.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Delco Moraine NDH Division
2509 Hayes Avenue
Sandusky, Ohio 44870

Date:	April 25, 1991
Facility Representatives:	Robert Hare, Delco Moraine NDH Division, Sr. Environmental Engineer (419) 627-7076 John Berent, Delco Moraine NDH Division, Sr. Facilities Engineer, (419) 627-7081
Inspection Team:	Julie Kaiser, PRC Environmental Management, Inc. Deborah Harrity, PRC Environmental Management, Inc.
Photographer:	Julie Kaiser, PRC Environmental Management, Inc.
Weather Conditions:	Clear, 75°F
Summary of Activities:	The VSI of the Delco Moraine NDH Division facility at 2509 Hayes Avenue in Sandusky, Ohio, began at approximately 10:30 a.m. on April 25, 1991. The inspection began with an introduction and discussion of the purpose of the VSI. An interview proceeded, during which the facility representatives described on-site manufacturing operations, site ownership, types of wastes generated, and waste management practices. Facility representatives also described remedial activities that have occurred on site as a result of leaking tanks; a petroleum underground storage tanks and an aboveground process tank containing PCBs. During the interview, PRC representatives requested several documents pertinent to SWMUs and regulatory history. The inspection team, accompanied by the two facility representatives, then conducted a walking tour of the waste generation points and satellite accumulation areas in the manufacturing building, the closed and active container storage areas, the sludge disposal sites, the wastewater treatment plant finishing ponds, an outdoor product storage area, the recycled oil tank, the chip silo, the locations of the remediated aboveground and underground storage tank sites, the concrete sludge collection pad, the tank farms, and the wastewater treatment plant. Photographs were taken of pertinent site features. The VSI ended at approximately 5:00 p.m. The facility representatives asked that PRC send a written request for the documents requested during the VSI.

Photograph No. 1
Orientation: Northeast
Description: Enclosed container storage area

Location: SWMU 1
Date: 4/25/91

Photograph No. 2
Orientation: West
Description: Outdoor, closed container storage area on alloy pad

Location: SWMU 2
Date: 4/25/91

Photograph No. 3
Location: SWMU 3
Orientation: East
Date: 4/25/91
Description: Paint waste satellite accumulation area in maintenance building

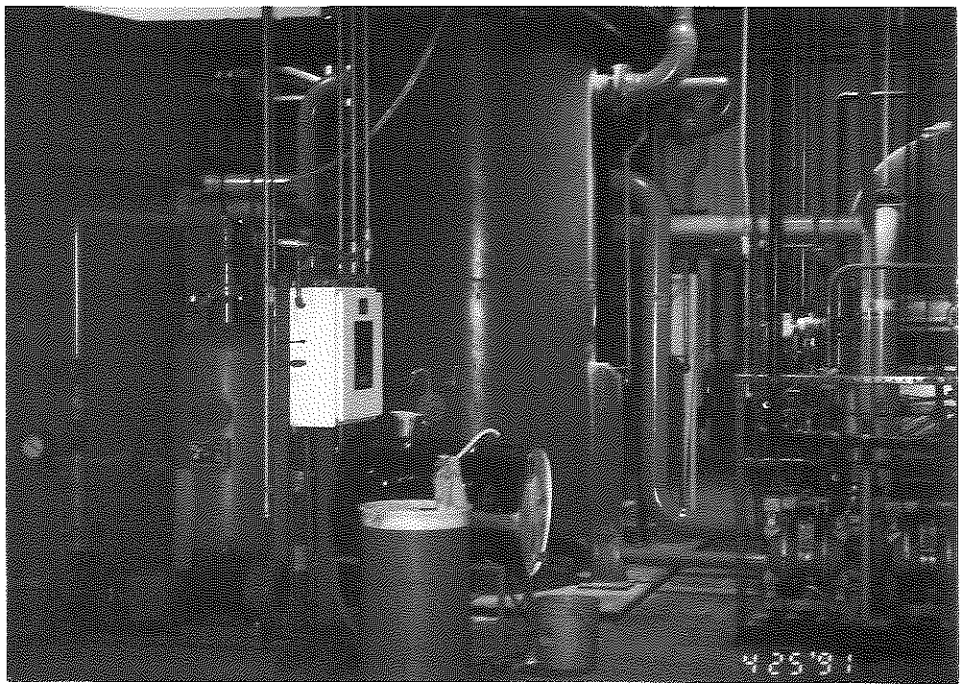
Photograph No. 4
Orientation: Southeast
Description: Freon solvent parts washer in model shop

Location: SWMU 3
Date: 2/25/91

Photograph No. 5 Location: SWMU 3
Orientation: East Date: 2/25/91
Description: Freon solvent satellite accumulation area in model shop

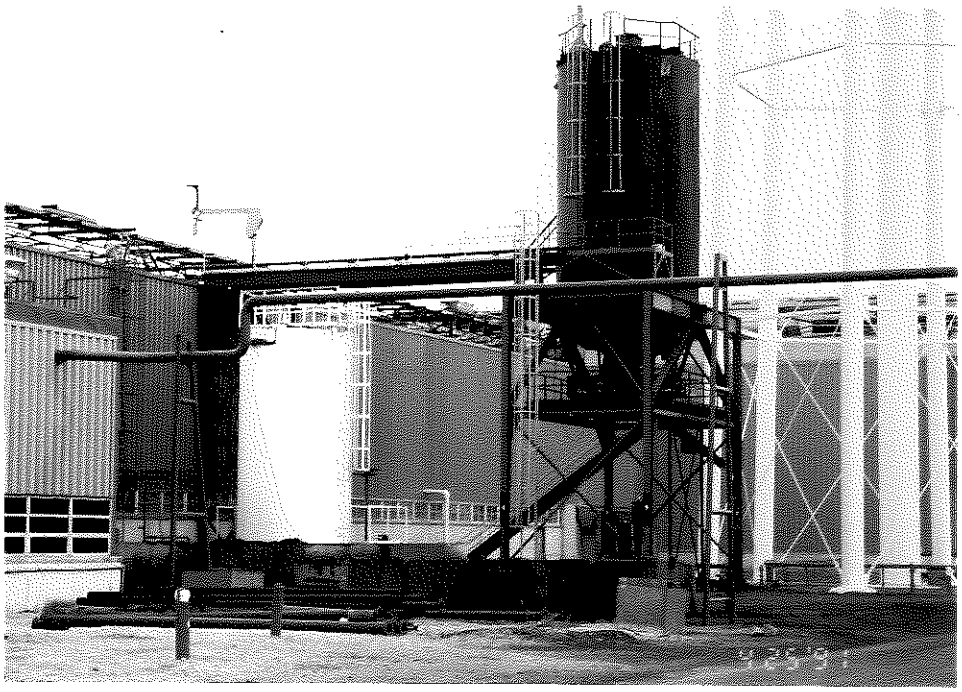
Photograph No. 6 Location: SWMU 3
Orientation: South Date: 4/25/91
Description: Petroleum naphtha satellite accumulation area on east side of plant

Photograph No. 7 Location: SWMU 4
Orientation: North Date: 4/25/91
Description: Chromium recovery unit west of plating line inside plant



Photograph No. 8 Location: SWMU 5
Orientation: East Date: 4/25/91
Description: Wastewater treatment plant on west side of facility

Photograph No. 9 Location: SWMU 7
Orientation: West Date: 4/25/91
Description: Wastewater treatment plant finishing ponds on west side of facility; note monitoring well in foreground



Photograph No. 10 Location: SWMUs 13, 14, and AOC 3
Orientation: Southeast Date: 4/25/91
Description: Metal chip silo (dark tank on right), and recycled oil tank (white tank on left)

Photograph No. 11 Location: SWMU 15
Orientation: North Date: 4/25/91
Description: Grind sludge collection box inside plant near naphtha satellite accumulation area

Photograph No. 12 Location: SWMU 15
Orientation: N/A Date: 4/25/91
Description: Grind sludge inside steel collection box

Photograph No. 13 Location: SWMU 15
Orientation: Northwest Date: 4/25/91
Description: Grind sludge concrete pad and roll-off box on west side of facility; note coal pile in background and construction debris pile to left of pad

Photograph No. 14 Location: AOC 1
Orientation: Southeast Date: 4/25/91
Description: Outdoor product storage area on southwest side of facility

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

4/25/91 PA/VSI FIELD NOTES

FACILITY: Delco Moraine NDH Division
General Motors Corp.
2509 Hayes Avenue
Sandusky, Ohio 44870

EPA I.D. #: OHD 001 880 442

PRC Personnel: Julie Kaiser
Deb Harkity

Facility Representatives: Bob Hare
John Berent

Notes taken by Julie Kaiser 4/25/91

~1030 Arrive at site - start with interview of facility reps.

Julie Kaiser

1/25 GMC NOH

Bob Hare
John Burant

-1-

Cooker for oil that's wrung from chips - in chip room

Buy spindle forgings → normalizing heat treat 1500°F
→ machining metal chips sold as scrap metal
(grind sludge, waste oils & wash water)

Unprocessed chips
Processed chips - silo
Metal chips are ground and wrung
Steel silo

LATING → Repair machine tooling only
Small batch line, hard chrome
Cu plating taken out 1985 No process here, just machine tooling (in house)

From ~~grinding~~ machining:
→ waste oils and wash waters → WWTP

cining filter systems → grind sludge generated
Metal working fluids (~~contains~~ acts as lubricant & coolant)

Grind sludge - solid - has been TCLP'd
metal fines & abrasives
→ landfilled - Ottawa Co. LF by BFI

TCLP alysis

Air filtration units at various points
media collects mist & dust and is ~~Recycled~~ Recirculated in the process

ils on

On Washers ~~mist filter~~ - have drip pans which collect the media and is then recirculated

Assembly - Parts are washed prior to assembly "Mineral Seal" (light fraction oil) and/or water soluble washing solutions
Semi-synthetic or synthetic → WWTP.

Grinding wheels get thrown away w/ grinding sludge.

Plating is for Repairing machine tooling only - not for production. CR is ~~Recaptured~~ Overed in process (from both rinse water & plating bath).
- Collected in drums
- when system fails - have 4 now.

Previously ~~did~~ treated Cr plating waste in old WWTP which also handled all other process H_2O.

1986 Started new WWTP shut down old one
Old one startup 1947

HAZ WASTE

General lacquer thinner in-house painting - ~~solvent~~ maintenance pting waste thinners
F005, ~~D001~~ - ~~paint~~

Freon waste in model shop - air bearing, hand mfg. operation
freon for parts cleaning in small dip tanks
Petrol. Naptha parts washers for fixtures - machine parts

Mercury waste - old meters that ~~may~~ have mercury
holding it till find a buyer
3 1 g cans holding 1 qt bottle each.

e switching
water soluble
end of year

~3 drums/quarter
~12 " year
* check annual report

4/25/91
GMC NOH - PA/VSI

3 satellite accum. areas and 1 temp. storage area

WASTE TYPES - PAST

~~F012~~ F007-F012 { Sludges from ht-treating operations - 1982 changed regs. to limit this to CN^- bearing sludges only so was not applicable

F001 1,1,1,-TCA - Used for ~~parts~~ cleaning ~~ex~~ production parts collected in drums; ?
Env'l Waste Control - Michigan
Stored in both outdoor & indoor CSA's.

(Outdoor closure has been approved by OEPA)

U226 - ~~to~~ was improper listing; ~~was component of~~
methyl chloroform; constituent of laquer thinner

D001 - naptha, thinners
D002 - corrosive / caustic based wash solutions.

(Approx.) since 2 yrs ago have been doing on-site neutralization of this waste so nothing generated.

F017 }
F018 } EPA took off list?

P029 - copper cyanide - NOT Right code (a mistake to have included)

U204 Selenious acid - ~~used to wash~~. used for etching.

U154 } methanol; constituent of lacquer thinner
U002 }
U019 } other constituents of lacquer thinner

D008 - lead paint waste - Sent to Env't Waste Control.

1986 F006 issue.

D001 Butyl cellasolve - cleaning solution for printing equipmt.

F003 Xylene - motor rewinding shop
varnish to put on the motor windings

have switched to water based epoxy varnish.

Notified EPA of haz waste activity for 2 surface impoundment because of Re-listing of F006 sludge (was delisted, but EPA rescinded delisting)
GM objected - got temporary delisting again
Chromium recovery unit was added in 1980
but had occassional Cr discharges to WWTP
1986 started new WWTP - had some chrom. discharges to WWTP in first 3 mos. ~~&~~ but have since plugged up the pipe to WWTP and can only drain that which doesn't go thru Cr. recovery

after lunch

4/25/91 cont PA/VSI GMC NOH

smaller drying area of less concern? not capped.

Old Sludge disposal sites — larger one was capped w/surrounding soil. Don't know how much fill.

1988 103(c) notification form sent to EPA for ~~surface impoundments~~ sludge disposal areas.

EPA hasn't responded

Estimates as to size, no drawings on 103(c)

Waste plant sludge - hydroxide sludge; no sampling.

Potentials - Cr.

No containment - natural clay underlying surface however.

4 GW ~~ponds~~ wells around holding ponds installed 1982-83

→ Sampling showed no hits ~~[illegible]~~

↓

OEPA asked for installation of wells in conjunction w/ holding ponds.

Retention for stormwater and WWTP water

1 mill gall each

No notif. on these [(103c) notification]

1986 when EPA rescinded delisting of F006, cleared out ponds

1971 First holding pond built

1980

put 2nd pond in because OEPA said couldn't bypass ponds during cleanout of pond (every 3-5 years)

1986-87 sludges from cleanout of ponds was landfilled

Prior to 1971 was discharged directly to Mill Creek.

NPDES - Since EPA formed have had permit

Violations - bulk have been BOD, TSS, oil & grease

Cr probably; seldomly tho.

Nothing to correct violations -

Feb. 1991 discontinued sanitary treatment; discharge to city now

Plan to discharge process water to city w/in one year (this summer)

Will use WWTP as pretreatment.

Will continue to discharge ~~to~~ stormwater - will keep NPDES. for this.

*

400-500,000 gpd is ~~ed~~ ~~this~~ outfall discharge rate.

combined storm & industrial effluent

No NPDES fines to date. (*)

Always had used city water - no wells

Too much sulfur - private wells 2-3 miles South.

farms nearby on city water?

Refuse disposal sites - No documentation

bulldozed trenches, buried trash

No clue how deep - guess 4-6'

No dimensions

Time frame for use same as Sludge disposal sites. but totally guessing.

Sludge holding bucket - for grind sludge

10 yard sludge box; concrete pad temporarily holding

no container

Naptha ~~dip tanks~~ parts washer - 50-60 units of various sizes
one 100-gallon parts washer
Freon on ~~the~~ east wall.
Grind sludge taken
from 5-6 filtration units, put into steel boxes, dumped onto
pad & put into sludge holding bucket.

Air pollution control ↓ dust filtration (cartridge type)
~ one drum dust per year from all units - collected from each one individually and consolidated.
Mist filtration units
~~Bulk dc in~~ Grinding area - mist
Spindle Machining - dust

* Schematics - process
WWTP
air

closure plan was approved w/ modification
GMC appealed - still in negotiations.

Indoor CSA - waiting on approval of plan?
Temporary CSA when closure proceeds, will be inside
drum storage area

PCB Release

process tank had PCB oil

Soil removed

Jan '90 - 8 months to finish cleanup

3 PCB transformers in one substation still exist - curbed floor, transformers labeled. (in basement of office bldg.)

No known air releases

Miscellaneous questions -

Sewer discharges - sanitary only

Drinking water wells - none known in vicinity - maybe to the south. (> one mile)

SPCC plan? - YES.

Janitors sumps - go to WWTP.

No storm drains to city sewer - all to on-site ponds.

One noise complaintant - Complained during stack tests (boilers) in summers of 1989 and 1990.

Floodplain? - don't know but no floods. 1/4 mile from Mill Creek.

Security - 24 hours - guard

No CERCLA activity other than 103(c) notification.

1/25 cont GMC NOH

3 shifts mostly

Photo log

Direction	Frame	Time	
E	1	3:35	Freon dip tank (small)
E	2	3:35	SAA Freon (one clear one dirty)
SE	3	3 40	Naptha SAA 6 drums
N	4	3 42	Grinding sludge box near Naptha SAA
N	5	3 43	Inside gr. sludge box
S	6	3 50	Tool grinding dust
			↳ goes on grinding sludge concrete pad
			Separate talk permit for this
W	7	400	Chrome plating line
S	8	401	Caustic parts washer → WWTP piping
			in Chrome plate room
W	9	402	Cr reduction unit
N	10	420	2 USTs at NE corner removal site
			pump where hole in wall is
			diff-colored asphalt — NON LEAKERS
W	11	425	PCB transformer in substation/basement
E	12	426	Curb in substation room/basement
	13	435	Grinding sludge collector box in chip room
	14	435	Chip wringer - dry chips → chip silo
	15	437	↓ oil in chip room
			Cookers oil / water separator
			water → WWTP oil → holding tank
			reused.
	16	440	Mist collector

17 445 FOOS Lacquer thinner SAA in truck garage

18 450 White tank - oil from chip wringer - Reused
black tank - processed chip silo

19 455 Grind sludge accumulation and box

20 505 Retention ponds w/ MW in foreground

21 515 WWTP inside

22 520 Enclosed CSA

23 525 Old/closed CSA

24 530 Raw product storage area

Phil Yanisse 4/25/91
1800

Swale

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: New Departure Hyatt, Sandusky, Ohio

EPA I.D. NUMBER: OHD001880442

LOCATION CITY: Sandusky

STATE: Ohio

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill		
• Surface Impoundment	X	
• Land Farm	X	
• Waste Pile		X
• Incinerator	X	
• Storage Tank (Above Ground)		X
• Storage Tank (Underground)	X	
• Container Storage Area	X	
• Injection Wells	X	
• Wastewater Treatment Units		X
• Transfer Stations	X	
• Waste Recycling Operations		X
• Waste Treatment, Detoxification	X	
• Other _____		X

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

See Attachment "A"

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   No hazardous waste or hazardous constituents releases known.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

   N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Clifford J. Smith, Plant Manager
Typed Name and Title

Clifford J. Smith
Signature

3/13/86
Date

ATTACHMENT "A"

Landfill

The area referred to has been indicated on the area map and was submitted with this Facilities Part "A" Application. Two (2) types of landfills have been utilized. Sludge disposal and refuse disposal. The sludge was generated in the Industrial Wastewater Treatment Process located here (NPDES Permit Number 2IC00011*DD). This sludge has been delisted by both the Ohio and U.S. Environmental Protection Agencies and as such is non-hazardous. This landifll was in use during the approximate time period between 1965 and 1972. The refuse disposal area was used for disposing of non-hazardous general refuse (same time period). There are no available records of quantities of waste disposed of in either disposal site.

Surface Impoundment

The discharge of storm water and treated wastewater at these facilities flows through one of two (2) storm water retention ponds. The ponds each hold approximately 1,000,000 gallons of water each and are flow through type facilities. The contents of these ponds is non-hazardous.

Waste Pile

Contiguous to the Container Storage Area (described below) is a contained, concrete storage pad for non-hazardous grinding sludges. The storage area is approximately 10' X 10' in size and drains to the Industrial Wastewater Treatment Process. The sludge stored in this area is generally disposed of daily.

Scrap, non-hazardous, miscellaneous steel that is generated from plant rearrangements is located west of the Powerhouse. The steel is sold to scrap dealers.

Container Storage Area

The refuse compactor compresses plant refuse to allow for more efficient transport of non-hazardous refuse. The container is located on the area map.

The sludge disposal gondola, used to haul non-hazardous grinding sludge is shown on the area map enclosed. This area is contained and drains to the existing Industrial Wastewater Treatment Facility. The gondola is hauled to landfill to be emptied daily.

Wastewater Treatment Unit

The treatment unit on site is currently operated under NPDES Permit number 2IC00011*DD. The sludge generated by this facility is delisted by U.S. and Ohio Environmental Protection Agencies. Its location is shown on the area map enclosed.

Waste Recycling Operations

Two (2) types of waste recycling takes place at this facility: non-hazardous oil reclamation and hazardous chromium recovery.

A. Oil Reclamation

Oils disposed of in the manufacturing operations flows to the Industrial Wastewater Treatment Facility. There they are separated from the waste flow and heated in closed vessels to remove emulsified water and solids. The oil is then shipped to an offsite reclamation facility for further processing.

B. Chromium Recovery

Within the manufacturing facilities is a chromium plating operation that plates for various customer requirements and to salvage parts. Contiguous to this plating operation is a chromium recovery unit. This unit takes the rinsewater from the plating operation and separates the chromium from the water. The water is returned to the rinsing operation and the chromium is pumped back to the plating tank.

Storage Tank (Underground)

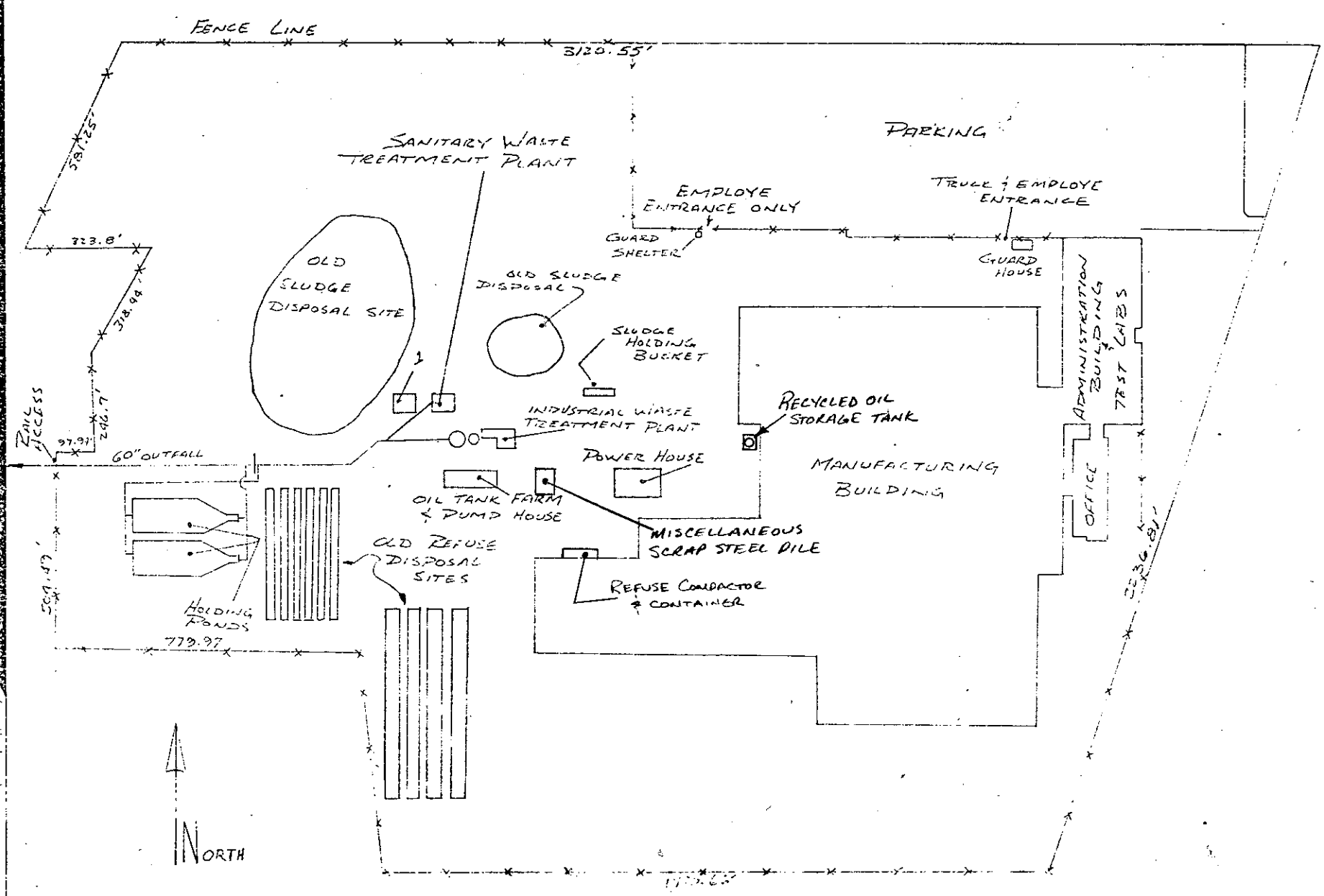
A concrete reservoir with a major portion of the structure underground used as a staging area for non-hazardous oil to be sent to outside reclaim facilities. The tank is located at the existing Wastewater Treatment Facility and has approximately 44,000 gallons holding capacity.

Storage Tank (Above Ground)

Two (2) steel, 12,000 gallon, horizontal dished end tanks inside a contained area used to receive the non-hazardous reclaimed oils returned from outside oil reclaimers. The tanks are part of the tank farm/pump house shown on the attached map.

Storage Tank (Above Ground)

One steel 6,000 gallon non-hazardous reclaimed oil storage tank adjacent to the manufacturing area and is contained. It is located on the attached map.

Continued from page 4.

V. FACILITY DRAWING (see page 4)