DEPARTMENT OF ECOLOGY
RECOMMENDATION FOR ENFORCEMENT

November 12, 2008

To: K Seiler, Section Manager, Hazardous Waste and Toxics Reduction Program, Southwest Regional Office

From: Dee Williams, Compliance Inspector Southwest Regional Office

Through: Ava Edmonson, Compliance Unit Manager, Southwest Regional Office

Subject: Recommendation for Enforcement at KP McNamara, WAH000025256

BACKGROUND

KP McNamara (KP) runs several tote-cleaning operations in the United States. This site is located at 503 SE Maritime Ave., Bldg 5 Ste B, Vancouver, WA 98661, and is located within close proximity to the Columbia River. Three people are employed in the shop.

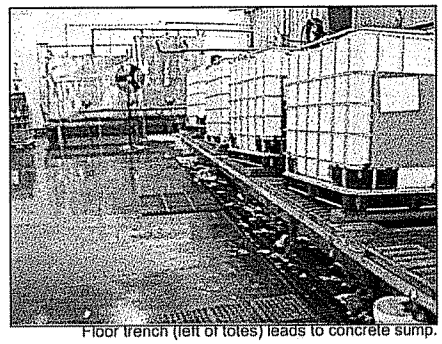
KP cleans, restores and deconstructs 275- to 330-gallon totes. These totes are supposed to arrive 'empty' (as defined in WAC 173-303-040), but may contain a small amount of residual material such as phenol-formaldehyde resins, paints, biocides, and water treatment chemicals. Product residuals are accumulated in 55-gallon drums. The waste is then designated and managed off-site. After residuals are removed from the tote, KP cuts and crushes the tote for off-site plastics recycling/disposal, or they rinse the tote with soap/water. The clean totes are reconditioned and restored for reuse.

Historically, soapy rinse water was allowed to passively drain via a floor trench to a sump, and was eventually pumped to two 2,500-gallon plastic tanks. Designation conducted by the facility had previously determined that the waste did not designate as dangerous waste, and the wastewater was transported in batch loads to Pacific Power Vac in Portland, Oregon, as a non-hazardous wastewater.

KP McNamara is a Large Quantity Generator of dangerous waste. They routinely generate ignitable, toxic and/or corrosive dangerous waste drained out of empty totes.

In August 2007, Ecology conducted a routine unannounced inspection at KP. Nine violations were cited at the time. The most serious violation centered on Ecology's observation that approximately 300-gallons of corrosive dangerous waste had been accumulated in a concrete floor sump. This waste had a pH of 14, and was generated as rinse-water from the tote washing process. At the time, KP planned to mix the waste with other rinse-water and manage it off-site as non-hazardous waste.

KP McNamara Tote Wash.



Floor trench (left of totes) leads to concrete sump.

Ecology issued an Immediate Action Letter following the August 2007 inspection. That letter directed KP

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FINDINGSthroSuegphte2008

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On June 3, 2008, Ecology met at KP's consultant's (Central Environmental) office to discuss compliance issues. Ecology learned that the first shipment of toxic dangerous waste had been sent to PPV in June 2008. This shipment took place after KP was directed to cease shipments until they met the WAC 173-303-141 requirements.

KP subsequently submitted information that showed they had adequately addressed the violations cited in May 2008. On August 27, 2008, Ecology wrote a letter to KP formally acknowledging compliance.

FINDING – October 2008

On October 2, 2008, Ecology was contacted by the City of Vancouver about KP's management of mercury-containing waste. On October 8, 2008, Ecology conducted an unannounced inspection at KP to follow-up on the City's concerns and determine KP's routine compliance with dangerous waste regulations.

Several violations were documented during the inspection (**Appendix 4**, a copy of the Inspection Report and Notice of Violation prepared following the inspection).

Totes at site – toxic dangerous waste.

KP had accumulated 280 totes, roughly 210,000-pounds of toxic dangerous waste. Totes were improperly labeled and stored in a way that restricted access for fire equipment. Totes were also stowed without secondary containment, and several totes had been on-site over 90-days.

During the October 8, 2008 inspection, Ecology also observed totes outside the building. These totes contained varying amounts of ignitable, hazardous and extremely-toxic dangerous waste. They were stowed outside in direct contact with the earth without secondary containment (the storage area is permeable gravel). KP's operations manager could not explain the origin of the waste and could not state whether the waste was generated by KP.

Tote at KP. Labels indicate toxic dangerous waste.

On October 16, 2008, Ecology wrote KP a letter and Notice of Violation. On October 17, 2008, Ecology conducted a follow-up inspection at the site. At that time, Ecology observed more containers of dangerous waste stored without secondary containment than observed on October 8, 2008. Ecology wrote and delivered a letter to KP (**Appendix 5**). This letter directed the company to cease accepting incoming shipments, and address concerns about the totes stored on-site.

The possible violations are as follows:

- **WAC173-303-140(1) Failure to properly dispose of dangerous waste.** Based on the inspection, the facility was sending dangerous waste off-site to a Treatment, Storage, and Disposal Facility (TSDF) in violation of the permit. The facility was sending dangerous waste off-site to a TSDF without identifying the waste as dangerous waste.

- **WAC173-303-395(1)(a) Failure to properly manage dangerous waste in containers.** The facility was storing dangerous waste in containers without secondary containment.

- **WAC173-303-630(7)(a)(i) Failure to meet the standards for operating a Treatment, Storage, and Disposal Facility.** The facility was storing dangerous waste in containers without secondary containment, in violation of the permit.

DISCUSSION:
The Requested Information for Carl Mr. Namara (water quality) is a violation of WAC 173-303. The violations are a threat to the environment. Table A attached to the Notice of Violation.

Other Considerations:
A. No concern has been given to the effect on Ecology.
B. Economic impacts: The facility will incur additional costs to ship dangerous waste to a TSDF. The cost to ship dangerous waste to a TSDF is approximately $3.00/gal. The cost to ship dangerous waste to a TSDF is approximately $50,000. The facility will incur additional costs to comply with the permit.
C. Ecological: The facility is in a sensitive area (close to a stakeholder's property).
D. Work limitations: The facility is in a sensitive area (close to a stakeholder's property).
E. Ecology has authority over the facility. Ecology has authority over the facility.
F. The facility is in violation of the permit.

G . H i s t o r t i h d e a c h y a l s e y c n o o p e r a l o w e e t e h r e f , i l a g d r i a s n r t e g a r d f o E r c o l o d g i y r ' e s c h t a i l s v e e i s g h E e c r o e l o b c g o y n ' c s e a r b r o s u c t m p l i a n c e .
H . E n t h i t s y t - V i y o l a o t W A C 1 7 3 - 3 0 3 b e e e c n i t i e n d h p e a s t . V i o l a h t a i v b e e s c n o r r e i c a t t e i d n r e a l y n e r .
I . E c o n o i m n i c c e n - S i e v e B a ' b , o v e .

T h e v i o l a c t i i t a e K D P r e p r e a s s e i n g t n i d f e i v c i a a f t t i c t o n W A C 1 7 3 - 3 0 3 r e q u i r e F m e t n h t a s e . a s K O P h a l s e e f n o u n t o l e a S i g n i f i c a C o m p l i e r . T h e o m p a h n a y s h i s t o c h r o y n - c o m p a l n i b a i n b c e e S c n o n s i d e r e d e n f o r c i e n m l e p a a t s T t h e o m p a d n i y r e d c i t s l r y e g E a c r o d l e o d g y ' s a c h i d r e c t i v e s , c o n t i t n o u p e e s r i a n t i e o l a W A C 1 7 3 - 3 0 3 .

RECOMMENDATION - ADMINISTRATIVE ORDER:
T o a d d r e l s v s i o l a c t i i t a e K D P (a n i d a c c o r d w a i n R C A W 7 0 . 1 0 5 l . 0 9 5) , r e c o m m a e r O d d e i r r e K P t i d n a g l a e c t i p o r n e c e o i t p h e r d e A r c . o p o y f t h p e r o p c O s r e d d e a r t t a a s A h p e p d e n d i x

RECOMMENDATION - PENALTY:
I r e c o m m a e P n e d n a a l s t s y o c w a i K P d i s n a p p r o d p s p a e s d a t e - o n l y d a n g e w a s a r e a l c c e p t o a t n o c t e e o s n t a d a r i n g e w a s W e h . i d t e h e r v i o l a w t e i r o e b s e r a v K e P d H W T R o e l i e h w a l s v e i o l a W A C 1 7 3 - 3 0 3 - 1 4 (1 2 p) r e s e h t g e r d e a t e s d u m a h n e a a t t h e e n v i r o n m e n t .

T h e v i o l a a t i e g v a s l y e t e r m u i s n i e n t h G e o m p l i A a s n s c u e r P n o t c e c y g u i d e D i i n s e c s r . e f i a c r t s a u r c y h s ' d e g o r f e h e r e ' a c t o m , p l h i i a s n t a c e a r d y ' ' s m l a u s l i n i e n s c s e n w i e v c e o s n ' s i d a e n r d e e d c , o m m e n d e d r p e f n a l a t i e s c o n s i d e r a t i o n .

P e n a D e t e r m i n a t i o n

V i o l a t i o n s	C a t e g o r y	O p t i o n 1	O p t i o n 2	O p t i o n 3
W A C 1 7 3 - 3 0 3 - F a i l u r e t o a p p r o p r i a t e d a u n d e s t h o w t h e n s e n d a i s n g a t e d - e o s n i l g y m a n a g e d r o u s w a s t e a m o u t - o f f - a s c t i a l t i e t y .	M a j o r	$ 6 , 0 0 0	$ 1 0 , 0 0 0	$ 1 0 , 0 0 0
W A C 1 7 3 - 3 0 3 a n d 2 4 0 F a i l u r e t o a p e r m i t t o m e e t t h r e e q u i r e m e n t s o p e r a t d i a m g e w a s t e e a t m e n t , s t o r a g e d i s p o s a l f a c i l i t y .	M a j o r	$ 6 , 0 0 0	$ 1 0 , 0 0 0	$ 1 0 , 0 0 0
T O T A L		$ 6 , 0 0 0	$ 1 0 , 0 0 0	$ 2 0 , 0 0 0

T h e p e n a r l a t n y g f e o t s r h v e i o l w a r e i c e a n l c u a l t a h l e c o d w r e a r n i g O p t i 1 a n d t h u e p p e a r n i g O p t i 2 o n p t i 3 o n s a l c u l t a p e d y i s g r e t i o n a r y f a c t o w i t h l e o w a e n r d p p e a r n g a s f , o l l o w s :

D i s c r e t i o n a r y F a c t o r / V i o l a t i o n	O b s e r v a t i o n / E v i d e n c e	I n c r e a s e (+) , D e c r e a s e (-) o n R a n g e o f P e n a l t y
D e g r e e o f T h r e a t	Dangerous waste was managed off-site	No reduction in penalty is

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	a b i t l m a y n f a c i s o m p l i o a v r e t c r i e m e . K P f l a g r d a i n s t r l e y g E a c r o d l e o d g y . ' s d i r e c t c i e v a e é f - s h i i t p e n t e o n t s P P V u n t h l e y o u d l e d m o n s t r a t è c o m p l i w a i m V d A e C 1 7 3 - 3 0 3 - 1 4 1 (2) .	
S m a b l u s i n e s s i n c e n t i v e s	K P i s o c t o n s i d e b r e e s m a l l b u s i n A e c i s o r t d i m e y i e b s f i h e o p e r t a h t r e f e a e c i i l n i h t U S (S O h i o C a l i f a o n V W h a i s a h i n g t o n) . T h e o m p a s m a y w a b l o $ u 5 t 0 , b 0 0 0 m a n a g i i t d s g n g e w a s s t l e r o u g h P P V .	N o r e d u c i t p i e o n n a i l s t y y w a r r a b n a t s e e d , c o n s i d e o n t a h t i s o n d i s c r f e a t c i t o o n r .

A f t c e o m s i d t h e a e b i o n d g i e s c r e f t a i c o t h l c a e r e s y o m n O e p n t d 3 w o i n a p h e n a l t y o $ 2 0 , 0 A 0 h 0 1 g p h e m a c l o t u h y l a d v b e e e d n e t e r m i E f c n e l o c o g n y s i d e r i e d e a c s h h i p m o d f i n a t h g e w a o s u (t s f e t v t e s a e l n t) P P V a , n 2 d . b) . o t h l s t a t n h c a e t s E c o l c o i g t K e P f l c a r c c e p n t o i n n - g e t m p o t t e y t s h c a a t s t e h p e e n a w l o t u h y l a d v e b e e $ n 7 0 , 0 T 0 h 0 p . e n a c l o t u h y l a d v b e e e n v e h n i g h E c r o l h o a g c y o n s i d l e e e d n u m e r r o e u p s e a i t o l a c t i t a c e K r P s .

REFERENCES

- *A t t a c h 1 m A e - u n g t u 2 s 8 2 , 0 0 l 7 m m e d A i c a t t l i e e t o a t r e S t r e p t e r 2 n 6 2 e 0 r 0 7 L e t a t r e t r n s p e R c e t p i c o m t .*
- *A t t a c h 2 m k E P M t c N a m a s r g a P e d i a c n i E r s a c t D i e c c e e s m 2 b 7 e 2 , r 0 0 7 .*
- *A t t a c h 3 m M e a n y t 9 2 , 0 0 L 8 e t a t r e t r n s p e R c e t p i c o m t .*
- *A t t a c h 4 m G e c n t t o 1 b 7 e 2 , r 0 0 L 8 e t a t r e t r n s p e R c e t p i c o m t .*
- *A t t a c h 5 m G e c n t t o 2 b 0 e 2 , r 0 0 l 8 m m e d A i c a t t l i e e t o t e r*
- *A t t a c h 6 m G e n d f e d K r P .*

Table A – Violations Cited at KP

Violation	Date Observed
WAC 173-303-070(3) Failure to designate wastes. KP could not demonstrate that the waste had been adequately designated prior to off-site disposal.	August 2007
WAC 173-303-145 Failure to notify of spills or releases. Spills were observed around process vats, lines in treatment areas and tanks. Residuals were observed on the ground and various locations outside.	August 2007, October 2008
WAC 173-303-180(1)(a) by reference: Failure to properly prepare hazardous waste manifest. Manifest #00169259 did not include transporter name, phone number, EPA identification number	August 2007
WAC 173-303-200(1)(b) (WAC 173-303-640(5)(a), (4)(b)) by reference: Failure to meet the dangerous waste tank storage requirements. KP was accumulating dangerous waste in in-ground concrete pits, two "rinse tanks" stainless steel tanks -- its integrity not certified. The tank system lacked adequate secondary containment, did not have adequate controls, and was not properly designed, installed, or operated to prevent releases to the environment.	August 2007, May 2008
WAC 173-303-200(1)(e) (330): Failure to provide adequate personnel training. Failure to prepare and maintain a written training plan, and maintain training records. Operators do not seem to be able to define the difference between dangerous and non-dangerous wastes and do not seem aware of the risks associated with the management of the waste. The study did not seem concerned about spills, heels or about accumulation of high-pH liquids in the floor sump. In addition, as Ecology worked, it did not seem to understand adequately the Dangerous Waste Regulations.	August 2007
WAC 173-303-200(1)(e) (350): Failure to prepare and maintain an adequate Contingency Plan and emergency procedures. A Contingency Plan was not prepared by the facility. Operators could not demonstrate understanding of the facility's processes.	August 2007
WAC 173-303-141(2): Failure to use appropriate disposal methods, sending designated dangerous waste to an out-of-state facility. KP disposed of its pipe shop state-only dangerous waste (rinse-water) through Portland Public Works (PPW), Portland, Oregon.	May 2008
WAC 173-303-200(1)(b) (f) by reference 173-303-630(6): Failure to conduct weekly inspection of dangerous waste accumulation areas and containers. KP skipped documented weekly inspections.	May 2008
WAC 173-303-170 by reference 200(1)(d): Failure to label containers "Hazardous Waste" or "Dangerous Waste", and/or failure to provide labels that identify the major risk. Totes/drums were not marked dangerous waste and/or the risk.	August 2007, October 2008

WAC 173-303-200(1)(b)(iii) Failure to conduct general inspections. The owner/operator failed to conduct general inspections of the hazardous waste storage area. Violations were observed during the inspection and were not corrected in a timely manner.	August 2007 October 2008
WAC 173-303-200(1)(b)(iv) Failure to take appropriate measures to ensure the requirements of WAC 173-303-200(1)(b)(i) are met, and dispose of the hazardous waste at a permitted facility. KPA accepts the EPA's comments regarding the interpretation of the terms "empty" as defined in WAC 173-303-160(2) regarding dangerous waste treatment, storage, and disposal facility. NOTE: August 2007 October 2008 EPA, acting in its authority WAC 173-303-905, has determined that an appropriate remedy for the dangerous waste treatment, storage, and disposal facility.	August 2007 October 2008
WAC 173-303-200(1)(b)(v) Failure to maintain at the minimum the following: a) Failure to maintain adequate aisle space between rows of containers to allow for emergency response and equipment inspection. The owner/operator failed to provide adequate aisle space between the containers, as observed during the inspection.	October 2008
WAC 173-303-200(1)(b)(vi) Failure to maintain a 90-day storage limit. The owner/operator has exceeded the 90-days.	October 2008
WAC 173-303-200(1)(b)(vii) Failure to provide adequate secondary containment. Over 30,000 gallons of hazardous waste was observed in the storage area. KPA and McNamara are in the process of updating the hazardous waste storage area to comply with the secondary containment requirements.	October 2008

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 Olympia, Washington 98504-7775 (360) 407-6300

Decem3b2e0r08

CERTIFIED MAIL
7 0 0364 5000 0617 5352 8 4

Mr Ker Mrcy Namara
KP McNamara
397 Hamilton Avenue
Cleveland, OH 44114

RE: KP McNamara Corporation, 5 Mariah Avenue, Vancouver, WA 98661
RCRA #WAH000010603

Dear Mr McNamara:

Enclosed Neor 6.237 equivalent to a Dangerous Waste Regulation (WAC 73-303), addressed to human health environment. Also enclosed a Notice of Violation, showing fiscal liability and dispute cases, negative consequences and dangerous waste treatment and disposal facilities.

If you wish to form a Notice of Penalty, you must follow the procedures in the Notice of Penalty. You may appeal to the Pollution Control Hearing Board within 30 days of your receipt of Order/Penalty.

All correspondence and attachments must be directed to Dee Williams, Department of Ecology, Hazardous Waste Office, Box 47775, Olympia, WA 98504-7775. If you have any questions or concerns, please contact Dee Williams at 360/407-6348.

Sincerely,

(

Kevin Sellers, Manager
Hazardous Waste & Resource Program
Southwest Office Regional

Enclosures

cc: Penalty Letters, Office
Douglas Wise, Vancouver Resource Program
(douglas.wise@ci.vancouver.wa.us)

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF AN ADMINISTRATIVE ORDER AGAINST: **Mr Kevin McNamara KPM McNamara**	)))	ORDER No. 6237

To: Mr Kevin McNamara
also known as personally
397 Hamilton
Cleveland, OH 44114

For the site located at
503 E Main Avenue
Vancouver, WA 98661
RCRA ID# WAD000010603

This is an Administrative Order requiring Kevin McNamara and KPM McNamara (collectively "KPM") to comply with Hazardous Waste Management Act (Chapter 70.105 RCW) and the State Dangerous Waste Regulations (Chapter 173-303 WAC) by taking the actions described below. Chapter 70.105 RCW gives the Department of Ecology (Ecology) authority to issue orders requiring compliance with the terms and conditions of Chapter 70.105 RCW and Chapter 173-303 WAC.

The Department has determined that KPM has managed dangerous waste in a manner that presents a threat to human health and the environment. The Department has determined that KPM is in violation of the following:

1. **WAC 173-303-141(1)(a): Failure to properly manage dangerous waste in accordance with the requirements of WAC 173-303-200 through 230 when managing dangerous waste at a facility.** KPM is a property owner of a property located at 503 E Main Avenue, Vancouver, WA. KPM has managed dangerous waste at the property without having a dangerous waste permit from Ecology or EPA. Staff from Ecology and EPA visited the property on the following dates and observed the following:

   - **WAC 173-303-200(1): Failure to properly manage dangerous waste containers.** KPM accumulated dangerous waste in containers that were not properly labeled or marked with the accumulation start date.

   - **WAC 173-303-280(1): Failure to meet the requirements for managing waste at transfer and disposal facilities.** KPM has accepted for storage waste at the facility that is not

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o f g n i e a b t h e m a e z l a y r a d n o t l u o s d a c n g e w r a o s u t s e P q . p e r a s a e d
d a n g e w r a o s u t t s r e e a t s m t e o n r a t a n g d l e s p f o a s c a w l H e i r a t y c e p h e d
t o t c e o s n t a d g a n n g e w r a o s u t s e

G i v t e h a e b o f v i e n d a i m d g a s c i , c n o r w a R C W A 7 0 . 1 0 . 5 i t s 0 9 5 e t r h e k d R
t a k l e a f e o l l a o w t i n g n :

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U p o r n e c e f p C i r s d e r r s , p r e d e s i g n e a t w i a o s n g e s e r b a y K t P e d
i n c l u d n i c h t g i m f o r e i c h s e h e " s w e l t e o r u p t r f a o i t a e r e s d p e n t
a b s o r b e n t .

D o c u m e n o t d a e t s i i o g n s a 1 h c n b u u d t e b t e l i m f i c e p o d e a e n a l y t i c a l
r e s o d e s i g h e s a n a r g c y o n t w a c h s l t a e s d r i a l t g n c a r a i l e s s o .
i n c l u b o d e e k s i g n i a n t f i o r m p a r t o c e k r s , o w M S D S e n d t h p e r r t i n e n t
i n f o r m T a h t i s o f r o . r m u a s b t e k c e p t s i i f t c a m i n i o n d i m y v e e a a r s d
m u s b e n a d a e v a i f l a r t e l v e i p o r n e q u i r e a s c t c o r w a W A C 1 7 3 - 3 0 ; 3 - 2 1 0 .

2 .WA C1 7-33 0 3 - 1-4D1i(s2p)o s S t a t e D a n g e W a u s s t e

u p r o e n c e d t p C i r s d . e r r s , p r e d e s p o s s f a a l t e d a o n g l e w r a o s u r t s i e n s e -
w a t A s l h i p m m e u n s b t e s a n i f a e r s c t a e d b j a e t d a n s v p i o a r v h t a e l r i d
E P A / s l t d a e t n e t i N f u i m c b a A t i s i h o i n p m m e u n s b t e s e c e a i a v s e i d t h e a s t
a u t h o t r a i c z c e e d p a t e d a o n g l e w r a o s u t A s e l s . h i p m m e u n s b t e s e p o r t e d
a n n u a a s h e g y u i W A e G 1 7 3 n 3 0 3 - 2 2 0 .

. W A C1 7 3 3 0 3 - S p 4 5 a r i B i s c h a t r d g h e e a n v i r o n m e n t

U p o r n e c e f p C i r s d e r r s , t u h a a l s p i o l d l i s s c h a e r p g r e o s p r e e r p l o y r t e d ,
d o c u m e a m t d e i d i g T a h t i e s d c . l s ! p J i d l l e l a s t ' t h h ú m e h a a e t a e a l m t t h h e
e n v i r o w h m e n t e h n e s r i i d l u e t . s K P d b e s u i l d i n g .

4 .WA C1 7 3 - 3 0 3 a n 1 7 0 r (e 2 f) e r 2 e 0 n 0 (p 1 a n g e W a u s s M a n a g e m e n t i n C o n t a i n e r s

I m m e d i u p b r e e l c y e f p C i r s d e r r s , t u h a l t f e o l l o w n i c g a t r m e e n t s

- W A C1 7 3 - 3 0 3 a - d 1 7 0 e (f 2 e) r - e 2 0 0 (- 1 A) c (c d u) m d a a g e . r o u s
  w a s i t c e o n t a t i h m a e t h e a s b e a l s " e H d a z a W a l e u t o s " ' D a r o g u e s
  W a s e . t A l s a b c e o h t a t i d n e e f r t i s h m e a b r i s k a (s s s) o c w i a t t h e e d
  w a s (e e g g n i c a b t e t s p i x e v i t e c c D . e) s . t o r r o e y m o l v a e b f e r l c s m
  e m p e t c o n t a i n e r s .

- 1 7 3 - 3 0 3a-rlb7yr0e(f2e) r- e2 r0 0 0e(-A-c) (c u m)ud laa ntgeewr ao suitsre c o n atihnaeemea r kwei ad ha c c u m u s l t a a t r i t d r e d f a i a t s t e h d e a t e t h w a t s i t f e i r s t t d a h b e b e n d a i n e r .

- 1 7 3 - 3 0 3 - a2 r0 b0 y r(e l f) e(l e e) r3 0 0 e(-5K)e (e c a p o) n t a c i l n o e s r e s d e x c w p h e a n d d o m r e m o w a s g e .

- WAC1 7 3 - 3 0 3 - a2 r0 b0 y r(e l f) e(r l e) r3 0 0 e(a5 n) d(7 3)- 3 0 3 - 3 4 0 (3) - S e p a r a t a t a e n s d d r s m s t i h a e s r e e 3 S i t n c b e s s p e a b c e t w e e n r o w a s n s l c t h a y n e m o r t e h a w p : 1 c T r h o a s s s s . p e a . c m e u b s e t s u f f t o a e r i c t o i n t t a a t r i e s p e a r a l o f h e s o I f c o t w h u e n o b s t r u c t e d m o v e m c e f n e t r s o f n i p r e e b t e c t i o a n s e p c u d i n p e m c e o n l t p m e n t .

- e WAC1 7 3 - 3 0 3 - a2 r0 b0 y r(e l f) e(e e) r3 0 0 e(C 6) n e l w u e c e t k i n s p e c t i o n i a a l r e w a h s e d r a e n g e w r a o s u i t s s e c c u m u i l n a o t n e t d a M a e n a t r a i n i n s p e l c o t g t i o n a d l t u b d e a s a : e t d i m e n s p e 'c t t h i a e o n a e n d s i g n a o t f u h i e r e s p e a n o o a o t f i h o e r b s e r v m a a t d i a e o n r d s d e a a e d n a t o a f a e c y o r r e c t i v e m e a s u r e s t a k e n .

- WAC1 7 3 - 3 0 3 - a2 r0 b0 y r(e l f) e(l e e) r3 0 0 e(-7P)r (o d a) i d d e e q u a t e s e c o n d o a n r t y a i f r o m r l e a a z l a l r w d a o s u t s e h s o t o c o u r t e s o l i f c h e e b u i l d i n g .

5 .WAC - 1 7 3 - 3 0 3 - a 0 W A C 1) 7 (3 b -) 3 (0 i3 i y r) e 4 0 e r D a n g e r o u s W a s M e a n a g e m i e T r a n k s

I m e n d i a t e r l e y c e e p p o C h r s d e e r s u h e a h t f e o l l o w n i c h g a t r m e e - r t s

- WAC1 7 3 - 3 0 4 3 -)-A6n4yC a (s t t e h a a t v l e e a k e d p r e c i p i n t a t i o n s e c o n d o a n r t y a i f r D r a e m g t e W a o s u t s e t a b n e k s e m r o w i s t 2 h 4 i n h o u r s .

- WAC1 7 3 - 3 0 3 - 6D4 a0 n(g5 e) w r(a d s u) t s a e m k u s s b t e p r o p l e a r b l e y l s e d " d a n g w a s o t d h a z a w a l s o t T e h . s e " i g n a b m e u b t e l e g a l a b l e d i s t o a n t c e a f s i f f e t e y t a . b e m l u i s n t g l e n t h m e a f j y r o i r s k u s f f i t c o i e n t l y w a r e m p l o y e m e s g r e e n s c p y o n s e a p r e t h r h s e o n g n e e n l e , r a l p u b l i c

- WAC1 7 3 - 3 0 3 -) D 4 a 0 (g 6 e w r a o s u t t s a e s k o r s a y g s e t n e u m s s t e i n s p e a c p t e 6 y r 4 0 ( ) 6 a) n (t h h i e n s p e s c h t o i u o l c h o b c h u e n e w n i t a e h n d i n s p e l c o p t g e 6 o 4 n 0 (6) (d) .

6 .1 7 3 - 3 0 3 - a 0 0 l y r 1 e) f (e e r) - e 3 n 2 c 0 e (2) - G e a c e r a l i t y - I n s p e c t i o n s

W i t h a 0 d r a y o s f e c e i t p C r s d e e r v e a l n o d p o l a l w o r w i t t n e p e s c c t h i e c d n u l e f o c u c s m i n o g i t e o q r u i i n p g s n a e f h a e t n t e l y m e r g e e q n u c i y p s n e c u d r e i v t i y c e s a n o l p e r a t i o n e / q s u t i p u n c h n e u t p r t p h e l a v t e e n t t e , c r e s p t o b n a d z a t r o d s

K e rMrcyN a maamrkaPM c N a m a r a
D e c e m3b2e0r0 8
P a g4eo 6

t hpeu bhlei acd ntt lheen v i r o(nrWeA:C1n7t3 - : 3 0T3h-s3s2h0e)dus te
s p e c iafdi dc raelbslhsyeoafshfea cwi hl ei rt ey h anzaat redncoiaujysensa n a g e d
i n c l tuhdteomtgee e a i v eiwaagsahr ecau,t - d o w n /acroeamapvdlacst toer
a c c u m u a l raetai so.n

M a i natlaoogfh hien s p e cadi cocomsvwa ttn 7 3 - 3 0 3 - 3 2 0 (2) (d) .

7. **W A C 1 7 3 - 3 0 3 a n 1 7 3 r (e 3 f) e r 2 e 0 n 0 c (e 1 9 0 a d l a y . A c c u m u l a t i o n**
U p o r n e c e f p C l r s d l e e r g d i i n s p o s f i n d y a g n g e w r a o s u t t s f e f i w t i e t 9 h 0 i n
d a y o s f h a e c c u m u s l t a a t r i t o D n a d r a g t e e w r . a o s u p t s e e n d d i i n s g p n o u s s a t e
m a n a g a e s d t i p u l h a n C l e s d a e n r i d a c c o r d w a t h h D e a n g e W a o s u t s e
. R e g u l a t i o n s .

8. **W A C 1 7 3 - 3 0 3 · 2 0 0 d l y r 1 e) f (e e r) e 3 3 0 e : r s o T n a e l n i n g**
W i t 3 h O d l a y o s f e c e f p C l r s d l e p r d a t n r e l a i n a t d a a i n n g e w r a o s u t t s r e a i n i n g
p r o g t r a a c h t j r r b e u s t a s i n e l r e e r g o e p n e c r y a t i o n s . .

9. **W A C 1 7 3 - 3 0 3 - 2 0 0 d l y r 1 e) f (e r) e 3 n 4 c 0 3 , 5 a 0 n e l 3 6 C 0 o : n t i n g e n c y**
P l a a n s E m e r g e P n r c o y c e d u r e s
W i t 3 h O d l a y o s f e c e f p C l r s d l e p r - , 'a c h a d l a e i n t t h a C e i o m t i r P g l e a n n c d y
E m e r g P n c o y e d l a d e l s e e m s e s r g o e p n e c r y a t i o n s .

1 0 W A C 1 7 3 - 3 0 a 3 n - e 2 4 8 0 0 0 : . **C a p s a e d r a a n t g i e o w n a u s s t e e a t m e n t ,**
· s . t o r a n g d e d i s f p a c s i a l i t y .
U p o r n e c e f p C l r s d e e r a c s p e e r a t a i o n a g g e w r a o s u t t s r e e a t s m t e o n r t a , g e
a n d l i s p (o T s S a f O l a) c u r l i a t s y u s n t h W e A C 1 7 3 - 3 0 a 3 n - d 2 4 8 3 0 0 a n d a r d s
a r m e e t C e a a e c e p t o i t t r e h g a r t n e o " t e m p a t s d y e " f i i h W e A C 1 7 3 - 3 0 3 - 1 6 0 .

· I m m e d i m a p t l e e d m p e e n r t a p t r a n c g i n p t r e o s c e t d o n e e s c t t h t a o r t h e e o s t
" e m p a t s d y e " f i i h W e A C 1 7 3 - 3 0 3 T h e p 6 0 a c n h u i s i e n s c h r o c u t l i e n e
. i n s p e o c e t a i s o h m i p m e t h h o f e a c i c h e t c f k o t n o g t t e h s a r t n e o e t m p t K y P .
m u s k t e e a p o s g h o w i l n T g h : e a m a e n s d i g n a f t h i e n e s p e c D t a o t r e f ; 2 .)
i n c o s n h i n g n 3 e O n) b t s ; e r v a a n t d i c l a e n s t y e r m t i l m t a h t s e h c i m p n (e p r a t r t o f
t h s e h i p m e u n s b t t e) e j e c t e d .

F o e r a c r h e j e s c h t i e p d n K e P m u t s k t e e a p r e c o o f h d f e o l l c l w T i) h n s g h : i p m e n t ' s
g e n e r (a n t a c a r e l d r e a s c s d l n t i a n c f t o r m 2 a A t) d i e o s n c) r ; o i f p h t s e h o i m p m e n t
b e i r n e g j e 3 c . F) i c t d a i l s p o a s n i d t t e i s o t n i o n f a h t r E i e b j r e l c o t a e d t d l a t o e
r e l e f a r s K e P .

F a i t o c o e m p v l i y t h t h m i a s y e C s i u t d h e t e r i s s o s a m p c e r l a d o t t e e r .
a c t i w o t n , s e a t d h m e i r n i s f u a l t t i e v n e f l o t , r h t e e r o m f s h C l r s d e r .

Y o l u a v a e i g l a p p e l a C l r s d T e a p p e l a y l o s m u s t :

- F iy l e a p p e v a l t h P e o l l U t o n d H r e o a l r B o g w s d t 3 0 d a y o s f t h e " d a t o r e f e c e o i f p h f d 's c u m E n t f m i e n a g r a b c t p u e a d e o i y t p h B e o a r d d u r t e g u o l f a f h i c c u e r s .
- S e r y o e a p p e o a t l h D e e p a r t o m E e c n o t l w o i g t y 3 0 d a y o s f t ") d e a o t f e r e c e o i f p h f d 's c u m S e t v m i a c p e e a c c o m p b i a s n h o y e f c h e p r o c e d u e e s i W A C 3 7 1 - 0 8 - 3 " C D 5 a o t f e e c e i i s p e t f " i a n t e d R C W 4 3 . 2 1 8 2 0 0 1

B e s u t e d o \ h f e o l l o w i n g :

- I n c l a u c o p o y f t h d c s c u m e n y f o t a h r a e p p e a w l i i y n b g N o t o c e A p p e a l :
- S e r v e f l i y l o e a p p e i a p l a p f e c r e m l ; e c t c r o c p n a i e c e o a t c c e p t e d .

1 T o f l y l o e a i p p p e v a l t h P e o l l U t o n d H r e o a l r i B o g a r d

M a a i p p e ; : i l : t (? :		D e l i y v o e a p p e i a p l e s t o n :
T h P e o l l U t o n H r e o a l r B o g s d P O B o x 4 0 9 0 3 O l y m W A 9 8 5 0 4 - 0 9 0 3	OR	T h P e o l l U t o n t o n o l B H b e a a r d i n g s 4 2 2 - 4 6 t A h v S E R o w S e i B x l , d 2 g L a c W A 9 8 5 0 3

2 T o s e r y o e a p p e o a t l h D e e p a r t m E e c n o t l o o g f y

M a a i p p e t a o l :		D e l i y v o e a p p e i a p l e r s t o n :
T h D e p a r t o m f e n E t c o l o g y A p p e & A l p s p l i c e R t e i l o i n e f C o o r d i n a t o r P O s 4 7 6 0 8 O l y m W A 9 8 5 0 4 - 7 6 0 8	OR	T h D e p a r t o m E e c n o t l o g y A p p e & A l p s p l i c e R t e i l O i n e o f r d i n a t 3 0 0 D e $ m D o S E ; l L a c W A 9 8 5 0 3

. A n d s e n c o p o y f o u a p p e t a o l :
D e W i l l i a m s
D e p a r t o m E e c n o t l o g y
S o u t h R v e g s i t O n f i l i c e
P 0 B o 4 x 7 7 7 5
O l y m W A 9 8 5 0 4

F o a r d o p i n t a i l n f o r m a t h E l n o v h i r o n H m e a n r t O a n l d W e b s i t e :
h t t p : e / h / o w a g v . o v

T o f i h a l w a s a l g e n r c u y l v e i s t h W e a s h i n S g t t a b t e e g i s W e b s i t e :
h t t p : / / w w w . l e g : w a . g o v / C o d e R e v i s e r

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K Seiler

K Seiler, Manager
Hazardous Waste Reduction Program
Southwest Office

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF PENALTY ASSESSMENT AGAINST Mr. Mrcy Namara KMPc Namara	)))	NOTICE OF PENALTY INCURRED AND DUE No. DE6229

To: Mr. Kerr Mrcy Namara or to whom am personally
397 Hazmi Ave
Cleve OH 4n4d1,14

Fotrhseilt oec aatted
503 SE Mari Ave #5
Vanco WA 98661
RCRA # WA0H0010603

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K F M c N a m a r a
D e c e m 3 b 2 e 0 r 0 8
P a g e 2 5

Y o u a v t e h r e i g h s t u b m a i A p p l i c f a o R r e d r f e E c o l o Y g o y a . l s a v t e h e r i g h A p p e t a h l . i p s e n t a t o l h P e y l l C u c t n i t b l n e c a l r B o g i s n d m e d w a i t t e h b y u t e x e r c t i h s e p t o g f o n l i i A n p g p o n l i f c R r e i l t o E e c f o l o g y .

I y f o f u i a l t e i m A e p l p y l i f c R r e i l t o E e c f o l w o i g t y t h h i n r 3 t O y a y o s f y o u r e c e i p t o f t h m e s t o c p E e l n a E l c t o y l , w q i g r l y e i s p w o n t e h " N o t o i f D c i e s p o S l p t o n q n A p p l i c a R r e i l o n Y e o f w . i " t l H e h m a v a e r i g t h c a t p p e E a c l o l o N g o y t " i s c f e D i s p o S l p i d A n p c o n l i c R e l i o n H P f o o l r l u t i o n C B o a r d l H e a r i n g s

N O T I C E E y f : o d u c m o s t u b m a t i t m A e p l p y l i f c R r e t l c i A e p f p e t a h P l e s n a v l i t l y b e c o d m u e a e n c d w i . n a g w r i n t o b l t e s u b j t e f c u r a t h m e r n i s t f u d t e v i e w .

T o s . u b m a i n A p p l i c f a o R r e d r f e d a m A s s e s S e n d a P t u y r : s t u e h a p t e r 4 3 . B 2 R C W y o u A p p l i c f a o R r e l m o u e s f t e s u b m i i w t r e i c t o h D g e p a r t m e n t o E c o l w o i g t y t i (3 0 y a y o s f h d e a t o f e e f p d i o s c u m e n t .

T o a p p f l o r r e l y i o e u f u s t

M a y o A p p l i f c R r e l t o e a : f	D e l i y v o e u A r p p l i f c a R t e i l o i n e f p e r s o n .
T h D e p a r t o m E e c o l o g y A p p e & a A l p s p l i f c R r e i d o n e f C o o r d i n a t o r P O B o x 4 7 6 0 8 O l y m W p A i 9 a 8 5 0 4 - 7 6 0 8	**O R** T h D e p a r t o m E e c o l o g y A p p e & a A l p s p l i f c R r e i l o n e f C o o r d i n a t o r 3 0 D e s m o D n S d E L a c W t A y 9 8 5 0 3

T o A p p e t a h l N e t o d f e > e n y a o l m u y s t :

- F ' y i o l a e p p w a t h e P o C l o l n u t H t r e i c a o l r n B o g w s i d t 3 h 0 d a y o s f h e " < ; o J f a e t c e o i f p h d i o s c u m E e n l m i e n a g a s t r u e a d l e y t p h B e o a r d d u r r i e n g g u o l f a h r i p c u e r s .
- S e r y w o e a p p e a t h D e e p m a r t o m E e c o l w o i g t y 3 h 0 d a y o s f h e d f l a t e r e c o e f i t p h t o i ' s u m i S e n t v m i a d y e e , a c c o r b p a l n i y s f l h e e d p r o q e i d d e r e i s W A C 3 e 7 d l - 0 8 - 3 0 5 a o t f e e 0 c) e . i d p e f f ' i a n t i e s d R C W 4 3 . B 2 . 1 0 (0 2 1) .

B e s u t e d o h f e o l l o w i n g :

- I n c l a u d e o p f y N e o t o P e n a t h y a y t a u r a e p p e a v l i t r h g N y o o u f c e A p p E : a l .
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF PENALTY ASSESSMENT AGAINST **Mr. Kerry McNamara** **KPMcNamara**	)))	NOTICE OF PENALTY INCURRED AND DUE No. 6229

To: Department of Ecology
State of Washington
South Rwegs Office
PO Box 47775
Olympia, WA 98504-7775

KPMcNamara and Kerry (Mrs. Nesmiadpeartsohnarslelcye) is owed "NOTICE OF PENALTY INCURRED AND DUE," which is that the KPMcNamara and Kerry McNamara have an outstanding penalty of $20,000.

I have further handed under RCW 9A.72.030 which is included in this document which is prepared for the sake of a statement herein by making, declaration, or behalf of KPMcNamara and Kerry McNamara in a public certification mitigation or terminos of the penalty of the following reasons:

KPMcNamara
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By _

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(2) Perjiuthye sdeecgoinsdelaCsfselony .

[1917s5tx c2s6 s0e9A.72.030]

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 7770 · Olympia, Washington 98504 · (360) 407-6300

August 21, 2007

CERTIFIED MAIL
7007 1000 4225 0637

Mr. Jeff Hughes
KPMcNamara
503 E Mariah Avenue #5-B
Vancouver, WA 98661

Re: Immediate Action Re: KPMcNamara, Vancouver
RCRA ID WAH000025256

Mr. Hughes:

Thank you for your letter of August 21, 2007. August 21, 2007 is your know, is KPMcNamara's Vancouver Dangerous Waste Regulation (WAC 173-303).

While one-sixty-one-, in spread of [illegible] cumulative KPMcNamara's [illegible] sump - [illegible] 14 w, which designated as a [illegible] outgoing [illegible] inspection [illegible] concrete sump.

The Dangerous Waste Regulation [illegible] when dangerous waste [illegible] cumulative KPMcNamara [illegible] these standards [illegible] concrete [illegible] stationable abilities [illegible] wastes.

KPMcNamara [illegible] WAC 173-303-200 (WAC (b) (ii 173-303-[illegible]) refer [illegible] lowing [illegible] :

1. Immediate [illegible] sump [illegible] system [illegible] possible [illegible] KPMcNamara [illegible] integrity.

2. Within [illegible] dangerous [illegible] drum [illegible] WAC 173-303 [illegible] August 16, 2007 [illegible]

G

3. must be stored and waste handled consistent with approved contingency plan. Failure to do so may result in revocation of approval to operate the system.

4. Within thirty days of receipt of this letter, the permittee must submit a Closure Plan for the residue (waste sand, gravel, and debris) currently stored on the property and cumulated and designated as equipment WAC 173-303-610(2). Note that WAC 173-303-610(2) requires that the closure plan be submitted at least 180 days prior to start of the closure activities, and be prepared and observe work.

5. Within 30 days of receipt of this letter, the permittee must submit a closure plan for the system to determine if the system is a closed loop system. The plan must include a detailed evaluation of the closure performance standards in WAC 173-303-610(2). Please refer to the enclosed *Guidance for Closure and Draining Waste Facilities* (Publication #94-111).

6. Within thirty (30) days of receipt of this letter, the permittee must submit a sump-water analysis to determine the requirements of WAC 173-303-070(3), including the designation and identification of persistent dangerous waste. WAC 173-303-070(3) **NOTE: Based on Ecology's test of the sump-water sample, the designation of the sump-water as a Dangerous Waste Code D002 must be determined and the waste code applied.**

7. Within six (6) months of receipt of this letter, the permittee must prepare and submit to Ecology a closure plan including a description of the system's structure (including dimensions), the system's capacity, and the volume of the residue. Also provide the results of the evaluation of closure performance standards cracks at the 01-point of the impoundment, and other information. This information should be sufficient to determine if the system is a closed loop system relative to groundwater.

8. By November 16, 2007, notify Ecology that the sump-water analysis test was performed correctly and the sump-water was determined to be a Dangerous Waste Code D002 and applied the waste code. Provide a copy of the analytical results (with the laboratory's signature) showing the waste is a dangerous waste.

The above actions must be taken without prejudice to Ecology's concerns about the adequate financial assurance, and the failure to enforce the terms of the Agreed Order, and the failure to manage the waste in compliance with WAC 173-303-070(3) and 173-303-610, and other violations.

If you have any questions, please contact me at (509) 329-3400.

Sincerely,

Kelly McNamara
Section Manager
Hazardous Waste and Toxics Reduction Program

cc: Jeff Hughes, Ecology
Jim Pendowski, Ecology
Ecology Central Files

- A proficiency is a great summary of the remaining algebra from the same sheet at the water/sediment, and a calculation of the water-rich sediment is the primary condition system in which the process structures are the basketball fairness, etc.

- As it is shown, the operation of the process is a common, tyrannic permit, a total effect, compared as no grew, was a secure a_rea and other integral equipment in the area is.

I would like to get the above information to the perceptions, which I forwarded to you in the future. Unless I hear, please, Mr. McNamara is named by the meeting the Lear Quean Gentry (a LtQsGrt) and the friendly WAC173-303 requirements are generally in the enclosure. *Quick Reference Guide to Drange Waste Generator Information* is available on the Ecology website http://www.ecy.w

Please contact 360/407-6348461@ecy.wa.gov if you have any questions about three guidance items, or subject to the Dangerous Waste Lead Inspector for the work with the work you are doing to these concerns.

Sincerely,

Jft, . Jj [illegible]

Dean R. Williams
Hazardous Waste Toxics Reduction Program
South Regional Office

cc: Doug Gis, Ci, Ty Fanco, Wa Ter Reserve Project Program

Enclosures:
Dange Waste Regulation (WAC 173-303)
Guidance for Cleanup Drange Waste Facilities
Quick Reference Guide to Drange Waste Generators

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 Olympia, Washington 98504-7775 (360) 407-6300

October 2, 2008

CERTIFIED
7008 3400 0017 5352 60

Mr. Kevin McNamara
KPM McNamara
397 Hamilton Avenue
Cleveland, OH 44114

RE: **Immediate Required Action** – KPM McNamara, 5038 Maritime Blvd, Vancouver, WA 98660, RCRA ID# WAH000022556

Dear Mr. McNamara:

As you know, the Department of Ecology (Ecology) has been responsible for KPM McNamara's Vancouver facility since October 2, 2008. At that time, Ecology observed several violations of the State Dangerous Waste Regulations (WAC 173-303) during a compliance inspection and notified of the violations in a letter dated October 2, 2008.

A follow-up compliance inspection conducted October 7, 2008 (see enclosed 17 October 2008 Inspection Report by Terrance Dutchman) indicates that the facility has not taken all of the corrective actions required by Ecology. Ecology observed several of the same conditions as indicated in the October 2, 2008 inspection. Ecology observed several violations (see listing in the October 2, 2008 inspection).

Ecology is giving you the opportunity to discuss these violations with KPM McNamara. Several of the containers of hazardous waste were found to be open, appear to contain extremely hazardous waste, and are stored in a way that poses a spill control hazard, and are in violation of the dangerous waste regulations.

KPM McNamara is directed to take immediate action to bring the facility into compliance with the applicable dangerous waste regulations. Failure to comply with the following requirements may result in the imposition of civil penalties, and/or other enforcement actions:

1. immediately cease all activities except those required to bring the facility into compliance with WAC 173-303-160.

2. Within two days of receipt of this letter, a plan must be submitted to Ecology to determine which containers are to be removed from the facility. Containers that are to be removed must be removed from the facility within ninety days of receipt of this letter, provided that the facility has not been designated as a conditionally exempt small quantity generator. Containers that are to be kept on site must be labeled "waste" and designated as "dangerous waste" or "toxic", corrosive, ignitable, or reactive as the case may be. Containers that are to be kept on site must be kept closed, provided with secondary containment, and provided with adequate aisle space. Containers that are to be kept on site must be inspected weekly and documentation of the inspection must be maintained.

3. With the hindrance of the first tree turn-on-top tree generator design and the spot shows that the fifth Dean generator was used due to a clean and tight connection. To the best of the generator's knowledge, the manager had to go through permit at the generator's Tesoro Facility. All of the 3 hindrance of the first tree provide a copy of the oil flag from the non-emptied tree turn-on-top generator, provided copy of the manifest that shows the generator was used to be disposed through the Tesoro facility.

KPMcNamara has repeated the Wayne Clark 73-3000 Colorado gas repeated expressed concern to KPMcNamara arcac's spot at the tree turn-on-top. At this time, Ecology considering forcing the hundreds of Hazardous Management (RCW 70.105F.080) to take action to confirm the dismed Acattleen tcoduil rdercets luyl t information forcement and impl fitpty $10,000 per day evriolation.

Contract (36400)7-6 3d4e8wi461@ecy.wa.gov 1,. 1 about the Dsenter or requaicted lamsl avaitmelwe ty hour you consultants.

Sincerely,

Dean Rams, Inspector
Hazardous Tox Reduc Pticogram
South Regit Office

Enclosure Compl Rapcoert

cc: Bre Jnotrge Onrseeenk, Sniv rdcenn Comutsai (nbgtie1@mccoa.snet)
Dou Wgis Vea, nco Wuavt Reers o Pr ce Pc tg (oDaomuglas.Wiesre@wcai..uvsa)nco
Ke Mrcy Nam rMac, Nak Pakrearrym@mkpmaccom)

Fac Name: KPMCNAMARA	Fac Type: QG PAGE 1 of
EPA/CRAD #: WAH000225 56	Inspection: 10/17/08
Site Contact: Terra Dutchman, (9 5 3 7 7 a - 3 0 8 8 e Will Sams, - HWTR Douglas Ci, Water Resour Protection	Inspector(s)
Address: City: Zip: 50 SE Mari Ave Bel, 5 St Be, Vancouver WA 98661	Focus Compliance Inspection

Photo (Ex: Ivy Lee): Sample No:

Notes (Inclusion of Ivy Lee inspected):

I contact Bert Jendtrgeon fs o Chreek side (KPMcNamara) and Eugene Jolly' letter to Mr Dutchman (Vancouver) Tyler Ettewra/sNeOtVK PMcNamara Oct 1 62,008, and was r: tn Ariel ek Esnivdier o ranMecnNtaamlaargae'nst.

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- J o h Y r a z z o o K D i u r a d C i a t r y w i a e l r k o s e v e v h i w l e v e e r c e o n d u t c h t i e n r s g p e { c W t h t i e a l g e g i n g t o t e l s s) a . h i e v a n t t e o c h t r b d l m e a e a d s f k f e o d b u s . c a n e h d e i s n d i t c l a i w t e a d s p o s s t i h C a l u t e a l a m W a g a h c t q u K F M r c e N a m a H r e a s . k a e b d o E u c t o l o c g p y n ' c s a K F s M c N a m a m l a e , x p l a t h r a t t c h t e e e s d t e b d e m p w t h y e t n h e a y r i v s e i d T e h o . l n e w e t r h e e d p o t e n t f i a u m l a n i e a a k r n s c h e t n h v e i r o a n m a d e l m s t o , o i r d e e g d u l a a a t d i a o n r g e w r a o s u . t s e t r e a t s m t e o n r a t a n , g d l e i s p f o a s c a i l p l c i i t m y t o e n d e f h e c t P e t p e t s h i c a t c t n t a a i b r o s u i d t x i n c b o é e s i b s u a e i b l t e o c t c e n t a a w i a e t d h e i a s t o x a i n d c h t e o r t e e e d t e b d e m p t l y . o f f e r t h t a h t t e o r t e e e d t e o c b n t o a n D r y 3 o % f t c h a e p a (c t i h t a y b . o 1 u g t a l o l v f o a n s t N e O) T . E D : n i e n c h o f e s i i d a 0 3 0 - g t a o l 1 t l 3 c o q r a l a d 5 s . t g 6 a l l o n s .

- T h r e o n - e t m o p t w e y s s e i t a t b i c n g g r e a w i e r l b s e c o n c d o a n r t y a i T h l m s e c n h t e . d l o r t e m a n a g t i h w e a g s o t f e f i w t æ r s o k t n o w n .

I N S W D A E R E H O U S E

- T h e w r e e r s e e v e e m a p t t o y t i e n s s t i h d w e a r e h a n r s l e e u , g 8 h 0 l f t y u o l t d e f s i n s e (w t a o t x e i r c d a n g e w r a o s ⊡ t M e r D) . u t c h s m a a 1 n 2 0 g G a l b d v r a s s t e b e h e a n d m p o e u d t f h p e r o c t e a s n s k s y e s t e a r l d o a n y g t , l h w e a s f t r e d r e t n o t T e h s w . a s w t e e r t M R F R P o r t l a n d .

- W e p H t e s t t h e l e d i q a u c i c d u m u i l t h a h w t e a s t h r e n T c h h e . i n s e i w t a h r t e e t c a a l t c h h - a p d a p h b f f o u M r r D . u t c h d m i a d o k t n o w h y h p e H w a s o W h p e H b n t h s e o a c p a t c h w - a p s a i m T e h . p e H b f t h r e i n s e n - e v a h p e o r l a y n w k a s s i g h t .

- T h e w r æ s i q o u n t i h d e g n r e o a u o m b e f t d h a e n g e w r a o s u t t s e t M e r s D . . u t c h s m a a i n d a p s o w e r w a s w h a t l e l e s . a f i d w e a s t t o e t w e e s r e l e n a o k t i n g .

W e c o n c l o u u d r e s p e a c n t d i e t c f h s e i t L e a . t i e t h r h d e a y c , o n t a E c r K i n d o G r e e k s i d e E n v i r o n h e e x p t l a t l h h e t e a d d a r k a e b d l f h t e o t t e h s a e t e d c e l d b e s v e a r l u a t a i p o p m e a t o e n d e y c . o n h a a i z r a r m d a o t u e s r l t a h e t d m a r t k h n e o n - e t m o p t t e y s a c t n t a n i o m e - c h a z c a h r e c m o . u i s c a (f e o x r a m p l h e o n E i ⊡ x s) e . n a t b a f h t e o y t i , e h s h s e t o r y a a g n e e t d b e v a l u t a d t e e t d e r i n t f h e y a r e e m p t A y n t y o t t h e i a s t o e t m p r t e y e t d b s e r e t u t r d n h e g e d e n e r o a t t h w e a s i t r h . h e e n t e c e t d e s t o b e d e s i g n l a f h d e e d s . i g s a l a d w s e i n i t t s h a a z t a r t d l o e u h s e e n t t i o w t e i e r t e a s i n d e u e d b s e s h i p t p a e T c S T c p r r o c e (s b s u i l a k g n i d n i g s p o s a l) .

I e x p l a t h k a E M d c N a m a a c r t a e e s d t r e a t s m t e o n r a t a n , g d l e i s p (o T s S a r C l a) c f i d r a t h y g e w r a o s u t s e b y a c c e p t h n i e o n r g - e m p t T y h i t s c r t o e h s i u b n i l t e e s d a y e t h T e S S t a n d (a p r e d r s m i t t i n g , T h e o m p w r o y f l u d r a t a e a r T S T f h e y t e d c k e m i f c a r i l s s p o s a l (d f r c a r i n e e x d a m p r e s i o d u c t f e o t f e d s r i s p o T s h a i l a s) I p s o o h i u b n i l t e e s d a y e t h T e S S t a n d a r d s .

I a s k E e r d f i o e l t a h y i n s f o r m M r , M : c i N t a i m o a r a a s k t e h d E a c t o l b o e k g e y p i t l h l e o o p c o n c e t r h p e i o n t g e s n a t d i e a h b e u s i r s e w s e v s o , u k l n d o w h o e p e v a i k a l b o o u u t r o n c a t h e s i T e h . i s f o r w a a s t o i n o m m u n i i c h a h s t e a e n d l e a b y e - m t a E r l B r r e J n o t r . g e a n n S M o r n . M c N a m a r a .

T a l e l A o n N m E t T e s

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6	O b s e r v e d U n m 0 a 8 c k o 0 n d t . w i s h d e k i s d i n H a l k e A) b i c 1 ½ l - t . f u l l .
A - M	M a r k " P d e p T s y i p t e " n 2 d . V a r y a i m r o g u o n f t e s s b o d e u t e v 1 e a e n m d - i n S h t e r s o n g n a t h a o l d e o T r v e t o t o p e s e (n l o i d a s n) c n t e o w t i e l t e n a v k a v l v e .
N - P	O b s e o v 1 e 0 d / 8 M a 0 8 K " e H B u l T e o r x . i r " c e i v t o y e w o d s u h c o t w w s o u b l e d t o x d i a c n a e w r a o s u B s e . t w 1 a e n m d - i n c c f h e e s e n r / e b s l i u d e u e .

T h a e b o t v c e t w e e s r l e a b e v l h e d t n o u t m e b a e n r d , s " w a p s e e a d d i e n s g i g n a l D i / D M R W 0 8 ,

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RE: C o m p l i l a n r s p e a c K t P M o N a m a 5 0 3 a E M a r i A t v i e B e d # 8 5,
V a n c o W A 9 e 8 r 6, 6 o 1 r O c t o 8 b 2 e 0 r 0 8
R C R A D W # A H 0 0 0 2 2 5 6 E R T # S 6 0 8 8 7 7

D e a M r M c N a m a r :

T h e D e p a r t o r E c o l (o E g c y o b c o g y d)u a c n i t r e s l p e a c K t P M o N a m a V r a a n 'c s o u v e r f a c i r O i c t t y 1 b 5 2, 0 0 T h i e n s p e w c a t s i n o i n t t i d a o t l e l d o m a r e p t o h r k t R M c N a m a r a g a e a e k r a u t e n l e r o c f u r y - w a r s t a e t i e n v i a n g t u h a f e t a e c i l i t y ' s c o m p l w i a t h h S e t a t e ' s W a s R g e e g r u o l u a s W A C 7 3 - 3 0 3) .

A n I n s p e R c e t p i o o s n m c l o s e t d a E i c l o i h n g g p y s l e s r v S e i v e v r i s o l l a v e i r e n s o b s e i r t h e i e r , s p e c t i o n i n c l u d i n g :

- **W A C 1 7 3 - 3 0 3 2 - 0 a O n , 0 1 6 3 F O a : i l t u p r r e o p r e a r r l a y g c g e n t a h i o e d i s n g d a n g e w e a s s** D e a . n g e w r a o s u w s a e a s c c u m u o l n a - t s e o d t h g l e a r 0 - d a y s . T h e w r a e a s s i g n i a f c i c u a n r u o l d a t n i g p e w r a o s u (t s o e v 3 e 0 r , 0 0 0 - a g n a t l l h l e o r n e s) w a s n a d e s q e r e a d r e c d o a n r t y a i f r o t m h e w i n a s t s F e u r t d h a e n r g , e w r a o s u t t s o e t e s w e r i e n p r o l p a e b r e a l h y w a l e r s e t o w e i d i m a d e a q i u s a p e a t c a e c c o m m a d a t e i n s p e c t i o n .

- **W A C 1 7 3 - 3 0 3 a - 0 D i u r a e v a p e r m t e a t c c e t p r t o , a d t i s p o o s a n g e r o u s w a s t** S e e . v e t r o a b l e f s i q w u e i r o d b s e o v e d s t h b e u e i l i d t h i h s e g t p r y a a g r l e d t . a p p e t a h r t a s h t e t s o e t w e s a a c c e p t e n f - s i t e T g e w y e e r r e a ' t t e o m p a s t s . y " d e f i i W e A C 1 7 3 - 3 0 3 - 0 6 0 .

T h e v s i e o l a t r o e o m s s i s l e e r m i e a d l o s s o t e c o r r e v i t 3 e 0 d a y a s s p , r e s c i r t h i h b e e d I n s p e R c e t p i o P r n t e . a e e m p a e n d e e t t u h C e r o m p l C a e r r d e a f n i d e a q t u e e s t e d i n f o r m a a d t i r c e i n c t h B e e d p o F r a t i t o a e q u a i c r t e i d o r u r s l e d s i u n l o t r m a l e n f o r c i e r m c e I n a t p d , e i m a g l s t s y u e d t e h H e a z a r W d a o s u N s a e n a g e A m c e (t r R C W 7 0 . 1 0 5 n 0 0 8 9 b 5 i) p t 6 1 0 , p O e d r a p y e v r i o l a t i o n .

Ecology concerns about mercury-waste waste is not the only reducing inspection. However, the area requests of the diamond (yes, no, spa) the three-cell viewing is not the only included with the response to compliance. Please also attach the size of the property in order to obtain the enough easement analysis.

Contact me at 360-407-6634 or 6634861@ecy.wa.gov if you have any questions about this letter or requirements. I am also available to work with your consultants.

Sincerely,

Dean Rams, Inspector
Hazardous Waste Toxics Reduction Program
Southwest Office, Office

cc: Brent Jorge, Cnrse Eenkes, Sivile Connes (tbarlemg_ri1@comcast.net)
Douglas Wise, Vancouver Reeds Purcell Pro (Douglas.Wise@ci.vanc

Enclosure: Compliance Report Notification Complaint Certificate

Fac Nlaimtey: KPMCNAMARA	FaciliDtyLCOGpe: PAGE 1 of
EPARCRAD#: WAH0 0 0 0 2 5 5 6	Inspe Dcattieo:n 1 0 / 0 8 / 0 8
SiCtentact: Terr aDnuctec hOpa ea r, a(9 5 3 1 7)7 - 3 0	Inspe Nlamer(s) B e W i l l S a W R O, - H W T R D o u W g i s C e i, W g t R e r s o u P r r c o e t e c t i o n N o l l a a n t S y W a R k O, - H W T R
Address: City: Zip: 5 0 3 M S a E r i A i v n e B e l, o 5 G t B e, V a n c o u W A 9 8 6 6 1	X Full Inspe D T a o g e t h e s p e c t i o n ERT#S6 0 8 8 7 7

Phottoask(eomir.ytee): Samplenso:

Note(eisnclauldiosfatgeiansspected):

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- Thwastewater-taacmvkesmeenlpatTtyhidoaniihyspelcovtgaisunrrTehmetwr.æsicpunid thfelcoeathteankasp,padrreanitbnLuiytrogneaurtislinTtkhy.Isqduriaditmtehdearlelar thoeverldeaatnsdlayameigrautesthbeuilding.

- Thterecocmtaliinqreuidindsewaatrc.hsmaahinepumpslei qiunittdweastewater asneedseedv,eraaldatyTimseusmaptthteermeinnodafIhterehmacdhefniwlidcdncret Thewreertevtooteofsinse(wtaodxeaincgewraosuntseahterewcdthopsreoxfmhhey overldeadTshewreersevertanteortfeuoslflinselwoactaereadSbeyc.onodcanrtyainm forthetsoetweassquestionable.

- Ia s k Me rD. u t c harbio:uisnh i p mw a s t e w ha h a ad ro n t a t ir mac d o u omfe s r c u r y , x y l e n e n z eHre se a t bwe a sw t ae s a u a w e d by u, t th e e t u tr o n e a c t c u mu t la n tl ki s o n a s k e d c o py f h me a n i f e s t s h s i p m e M rD. u t c hsma hi ed i d . m 'aitv H e h a d d i s c a i s t d e d . w h a e s w t ae s o dt i s p o la s s k e Mr . D u k n e t m h a e o u e f x y l e n e b e n z H e se a. h i e d i d k n n 'o f w c t; o u b l e p d a i Ht e a . I s a h i e d i d n ' w h a k y o w e s .

- M r D. u t c hcm a al. B l re edJ no tr g eo nC s ro en e kE sn ivdi er o n f m f e u nr t d a h l s c u as b s o t u b me e r c u r y c o n t a w ia ns i M e g l. o r g e in ns d o in c b a t a h e d e r i g s h n i a p m e a s e n t P a c P o w e a r (C P P V) , w h o e j e t c h s e h d p m e n t i c t o e n c t a a t u i rs m a c e d r c u T h w e a s w t ae s e t u t r k n R M c N a m a r a a n d f l f o a b e d k n K t R M c N a m a r c a c 'u sm u t l a n t C i s S . e p t e 3 n 0 2 , 0 0 t 8 h w e a s w t ae s m a n i f e s t e M R P S e f v P o e r t (l M a n d i f 0 e 5 2 1 # 4 1 J K T 2 h . w e a s w t ae p s r o f a i s l e d c o n t a i n m i e n g c u t r y a c e M R Pb. y t i h s C e i a t u P y b h r c t n e a c n e d e p w e a s t e .

- M r J. o r g e sn a K o R M c N a m c h a i r c a b o e t I i t e h m e e r c o u r r i y g i i m t a h n t p e r d c b e u s s t s u , s p e c t e d t h a h m e e r c w u a r a s y l r e i a t h d y e a n v k h e e i r a t r r a i t K R M c N a m a T h a t e r a n s (p N o R G e r E n v i r o n S m e e r n v h a t e l a s k) e p r e h v e i o u a t u B S P V K. R M c N a m a r a t r a e m t p o t b e t d a s i a n m p l e o f h w e a s f t r e P P P V b , u w t a s a t e t r h d a h t s e a m p h l a b d e e l r o s F o t r h r i e s a s o M c, N a k R P a r a a s s u m e d s p o n f s o c i r b e i a t t h i t e p a g n k h e r r o Q u u g a W a s h .

- M r D. u t c h p m r a o n v m i e d w e i d t h m e a n i f e s t s t s s n g e w r a o s u s t s h e i p m s e i n n t c s e r 2 e 0 0 8 h e s e i n c l u d e d :
  - o M a n i f 0e0s4t0#5 0 3w8i5t J H t J o K t o e f s n o n - R C R A (P d # 5 3 3 7 4 2 2 e- 0 0 8 f) - = s i t A u g u 4 s 2 0 0 8 h m e a n i d f e n d s t t n d i t c h a a h t w e a s w t ae ' s w a _ s t o e s w t a a t e e r - 'o' n l y d a n g e w r a o s u t s e .
  - o M a n i f 0e0s5t2#1 4 1w7i2d J h J e k i n (k 4 e 6 0 0 g a w f a l s o h e s w a s e t f M . R P S e r v o i c e s S e p t e 3 m 0 2 , 0 0 8 .

- M r D. u t c h d m i a d o k t n o w h e t n h n e e s h i p m w a s t e w a u t e a d p e a k e s . a K e r r y M c N a m m a r a k a e s o a s r e r a n g e m e n t s .

- W e w a l k e d s a n d d b s e s e e d m a p t t o y t W e s a . l o b s e f v i t e d t w e i s t h s (t t e h t e s t e e s d i n d o r t n e t e h d e e f i o l e m i p a t s d y e" f i i W A C 1 7 3 - 3 T 0 h 3 e) o . n t w e e n m e s t p e c i f i c a l k n o w b u t, t h p e r o d l u a c t e e l m s a o m f e o d u f h t e o t l e r s e . v i e b W e a d t e S r a i f a D l a t S a h e e t s a n d e v i e w e d o f o y m d " B u s a n " H B a n d T e h e B u s d a e s i g a n s a e x s t r e m e l y h a z a r w d a o s u (t s c e a r E R y W a s g C o d W ;T I 0 e t a n t d h H e B F u l d l e e s r i g a n s a _ t s e t s a t t e o - x o i n c l y d a n g e w r a o s u (t s c e a r E R y W a s g C o d W e T 0 2) :

W e c o n c l o u u d r e d p e a c n t b t i t h o a n M k r e D. d u t c h f o m a h i s O e f s f i a t t e 2 : p 1 . 5 m .

P O S T N S P E C T I O N

O n O c t o1b02, 0 0 8 e c e a i n E e m d f a r i B m eJ no tr g eo nC s ro en e kE sn ivdi er o n H m e e i n d i c a t e d t h a a t b n a l o y f s r i e s a e f e d f u r e M R t P S e r v h i a c s e h s o w o n - d e t c e o n t c a e b n l t e m a e t r i c o u r s y .

O n O c t o1b32, 0 0 8 o n t a B o r t e J n o d tr g eo nC s ro en e kE sn ivdi er o n W e e d n i t s a c l u t . s h f e e d l l o y i

- M a r :#i0i0f4e0s5t0 3w8i5t J H t J o K t o e f s _ n o n I R C R A P # 5 3 3 7 4 2 2 e- 0 0 8 f) e n s i t e A u g u 4 s 2 0 0 M 8 r J. o r g e s n a s f o h w i a s s w t a e s r a i o n u e t f l o t e w s a . n o r t i n s e w h a t e r . b e e p n r o f a i n d e d e s i g n l a t s e d d a . n g e r o u s .

- A n o t s h h e i r p m e n t s e w w i a b l e d e i r c k a e K P M c N a m a r O a t o1b52, 0 0 8 h i s h i p m e n t w i l l a r e m o n t 5 h , e 0 g 0 a 0 l b d d r a s n g e w r a o s u f t s e d m s e i A d d i t s i h o i r p a m w e i b l e l s s c h e d (u" l a e b d o n p e e w r e e f k o a r b o a m t o n t h ") .

O c t o8b2,e0r0 8

- A tt h ti isrMerM.c N a miansraak iarrr g a n g é nowe ans ttse ow a s pe tMsrDa ul t. c hhmaasn i . n d t lo ha ev e rdlimpatkteh easrer a n g eamieln s sweiaal ll MorM.c N amtaor ah a h d s e a s p e c t a c o p l e i r t a yKtPiwosans. t e w a b l e t e r a l M R F S e r v p i r c i e d s r e a t h w e i b l e l . t e s t t e e r d s u h e m t t e e t t h p e r o d h i l e a c t w e i t h s t r e g a c u d r y (c a n d a m i h e c o n c e n t r a t i o n s .
- M r J . o r g e d h i s d o k t n o w h r y o n - R e C r R p A t t o y t e s t w e o u s l i d t l e x . p l a t h M a e D d u t c h m a l s o n d o k t n o w h e t n h a y r o w e d y h w y r i e h y e a r d .

I r e q u e a s r M S e D d S o t r h H e B F u l t l o e t t r e y a v t a s u o n n d - s H i B t e F . u i o h w a t r h M e S D d S a i e h e d a y l c o m p l a e b o t o e d d e s i g n a i h H e B F u l t l o e t r T e h s p s o d i u s s t a t e t - o o d n a l o n y g e w r a o s u t s e c a r r E y P i A n a g s c t o e W e T 0 2 .

I a l s o m p l a e b o t o e d d e s i g n a i h B e u o s n a o n f T e h p s o d i u s s t a t e t - o o d n a l o n y g e w r a o s u t s e , c a r r E y P i A n a g s c t o e W e T 0 2 .

TABLE A – WASTE SUMMARY

Waste/Product Observed	Amount	Location	Management
1. Chro Waste (non-hazardous)	F i 3 2 0 - gTaoltleosn	No retnhol f t h e w a r e h o u s	C o n t a w e n e e r s o a e d g o o d e c o n d i L t a i b c e a l s e d o n - h a z a r d o u w a s t e .
2. Waste (asbestos only)	N i n e t 3 3 T w g T a o l t l e o s n (o v e 2 2 0 , l 0 b 0 s 0)	I n s i d e W a r e h o u s	C o n t a w e n e e r s o a e d g o o d e c o n d i L t a i c o d n i . s s p e a b e m i t e d i p e s c t i o n .
3. Unknown Waste	O n 3 0 - g t a o l t l e o , r F 3 u 0 P % l	O u t s i i T d o _ t e e S t o r Y a a g r e d	C l o s a e n d l g o o c d o n d i C t o i n o t n e . n t s u n k n o N w o r l a b e M I r S . u t c h s m a a n i d t h w e a s l t o e o k i e d t e a . n s d o c a b l e e o m - s i f t o s r o m t e i m e .
4. Unknown liquid (Busan)	O n 3 0 - g t a o l t H e 2 0 , 5 F % u l	O u t s i i T d o e t e S t o r Y a a g r e d	C l o s a e n d l g o o c d o n d i D t e i n o s y n e . l l o w l i q l u a i b l e " I B e u d s 1 a 0 n 0 9 W B " , " T r i R i n a e " d C o r r T o o s x i v e " .
5. Unknown liquid (H Buller)	T w 3 3 0 - g t a o l t O e o s e . : : 2 5 % f u s l e l c ; c o n t a i n e d 0 %	O u t s i i T d o e t e S t o r Y a a g r e d	C l o s a _ n e d l g o o c d o n d i G t r i e o e n n . - i s h l i q l u a i b l e " I H e B d u l l e r W B 3 7 0 6 R B M r D . t . l t o c h u m l a d f t i M S I D S o r m a t e S e p a l o s p t - i m o s t . e e s c t i o n
6. Unknown liquid (Casterol)	O n 3 0 - g t a o l t H e o . n e - i n c h e s o f i q u i d .	O u t s i i T d o e t e S t o r Y a a g r e d	· c 1 o a s n e d l g o o c d o n d i B t r i o o w n n . q u d M r D . u t c h s m a a n d t e o c t e n t a i n e d C a s t e r o l .

WASHINGTON STATE OF ECOLOGY

Washington State Department of Ecology Hazardous Waste & Toxics Reduction Program

Internet Address: http://www.ecv.wa.gov

Southwest Regional Office	Northwest Regional Office	East Regional Office	Central Regional Office
PO Box 47775	3190 16th Ave SE	4601 N Monroe	15 West Yakima Ave Suite 200
Olympia WA 98504-7775	Lynnwood WA 98008-5452	Spokane WA 99205	Yakima WA 98902-3452
Phone (360) 407-6300	Phone (425) 649-7000	Phone (509) 329-3400	Phone (509) 575-2490
FAX (360) 407-6305	FAX (425) 649-7098	FAX (509) 329-3529	FAX (509) 575-2809

COMPLIANCE CERTIFICATE

This document must be returned to Ecology by 30 days after receipt of compliance with Notice of Compliance and Inspection Report (and/or Notice of Compliance) as a result of the Notice of Compliance and Inspection Report (and/or Notice of Compliance) appropriate.

You may request an extension of the Notice of Compliance and Inspection Report (and/or Notice of Compliance) as a result of the Notice of Compliance and Inspection Report (and/or Notice of Compliance) appropriate.

You may request an extension of the Notice of Compliance and Inspection Report (and/or Notice of Compliance) as a result of the Notice of Compliance and Inspection Report (and/or Notice of Compliance) appropriate.

You may request an extension of the Notice of Compliance and Inspection Report (and/or Notice of Compliance) as a result of the Notice of Compliance and Inspection Report (and/or Notice of Compliance) appropriate.

Compliance Certification

1. I certify that the Notice of Compliance and Inspection Report has been corrected.
2. I have personally reviewed the information contained in this report and to the best of my knowledge and belief, the information contained in this report is true, accurate and complete.
3. I am a water treatment plant operator and the information contained in this report is true, accurate and complete.
4. I declare that the information contained in this report is true, accurate and complete.

Signature:	Print Name:
Position/Title:	Date:

Check the Evidence Submitted

Violation Code	Paperwork Statement	Comments
-340(3) & -630(5)(e)	D	D
-170(3)	D	D
170(2)	D	D
-630(7)	D	D
-320(1)	D	D
-145(3)	D	D
950(2)	D	D

Washington State Department of Ecology Waste & Toxics Reduction Program

CHECKLIST SUMMARY OF VIOLATIONS FOR GENERATORS OF HAZARDOUS WASTE (Page 1 of 2)

EPA RCRA #:	Facility Site ID#:	Facility Name:	Inspection Date:
WAH 000 025 256		KP McNAMARA	10/08/08

Dangerous Waste

Inspectors:
Dee Williams, Northwest Regional Office - HWTR
Douglas Yeaman, Solid Waste & Resource Protection Program

Instructions:
1. Violations must be corrected or be in compliance.
2. Do not mail in Certificate of Compliance or Certification.

Facility status is evaluated for each item on this Checklist as follows:
V=Violation NA=Not Applicable PV=Previous Violation (from previous inspection)

	WAC Code 173-303+	Conditionally Exempt SQG Requirements	Facility Status V	NA	PV
CESQG	-070(8)	Quantity limits - See the requirements for CESQG in WAC 173-303-070(8) and the summary of the requirements in WAC 173-303-070(8)(a)	D	D	D
	-070(7)(a)	Required records and notifications.	D	D	D
	-070(8)(b)	CESQG status is not required.	D	D	D
	-070(8)(b)	SQG exemption requirements and the requirements for CESQG in the environment.	D	D	D
	-060(5)	If the waste is not EPA Dangerous Waste, the waste may be disposed of in accordance with RCW 70.105	D	D	D
SQG	-060(1)	Site ID: Visit www.ecy.wa.gov	D	D	D
	-060(2)	Revised Site ID form must be submitted to the department of ecology	D	D	D
	-060(5)	Annual or biennial report	D	D	D
	210(2)	Copies of Annual Report and other reports	D	D	D
	210(3)	Waste designation	D	D	D
	-180(1)	Owner/operator responsibility	D	D	D
	-210(1)	Signature requirements	D	D	D
	-220(2)	Accumulation time limit	D	D	D
	-140(2)	Recordkeeping	D	D	D
	-010(7)(a)	Required records and notifications.	D	D	D
	-170(3)(b)	Treatment	D	D	D
	-300(5)	Reporting requirements	D	D	D
LQG	-170(1)(a)	Waste separately designated.	D	D	D
	-070(4)	Waste designation	D	D	D
	-070(6)	Application for waste designation	D	D	D
	-141(2)	State Dangerous Waste Identification	D	D	D
	-630(5)(a)	Containing records	D	D	D
	-200(1)(d)	Dangerous waste storage	fgl	D	fgl
	-630(3)	Containing records	D	D	D
	-630(5)(a)	Containing records	D	D	D
	-630(7)	Containing records	fgl	D	D
	-082(3)	Solid waste management	D	D	D
	-630(6)	Accumulation	D	D	D
	-200(2)(a)	Storage	D	D	D
	-200(2)(b)	Accumulation	D	D	D
	-630(8)(b)	Containing records	D	D	D
	-200(1)(c)	Accumulation	fgl	D	fgl
	-630(4)	Containing records	D	D	D
	-630(9)	Incompatible waste	D	D	D
	-630(5)(d)	Minimum	fgl	D	D
	-201(2)(a)	Disposal	D	D	D
	-016(5)(d)	Notification	D	D	D
	-505(2)(d)	Land disposal	D	D	D
	-802	Compliance with other requirements.	D	D	D

EPA RCRA #: WAH000022256	Facility Name: KP McNAMARA	Inspection Date: 10/08/08	(Page 3 of 8)

Facility status evaluated in the following Checklist: V = Violation NA = Not Applicable PV = Previous Violation

WAC Code 173-303-	MQG: LQG Requirements (cont.)	V	NA	PV
-340(2)	Communication device/spill control during waste handling [ref by -200(1)]	(D)	D	D
-340(1)	Emergency equipment provided/maintained, testing documented [ref by -200(1)]	(D)	D	D
-200(1)(e)	Posted emergency coordinator, phone number, fire dept phone, location of fire extinguishers, spill control material, fire alarm [ref by -170(2)]	D	D	D
-200(1)(e)	Designated emergency coordinator, emergency coordinator makes notification to ecology of releases that threaten human health or environment [ref by -170(2)]	D	D	D
-320(1)	General facility inspections [ref by -200(1)(e)]	IZJ	D	IZJ
-320(2)	General inspection schedule developed & followed [ref by -200(1)(e)]	D	D	D
-320(2)	(b) General inspection schedule identifies safety equipment and problems to look for [ref by -200(1)(e)]	D	D	D
-320(2)	(c) The required inspection frequency specified [ref by -200(1)(e)]	D	D	D
-320(2)	(d) The inspection log or summary kept for five years [ref by -200(1)(e)]	D	D	D
-340(4)	Arrangements with local authorities for emergency services made and documented [ref by -200(1)(e)]	D	D	D
-515	Requirements for universal waste: mercury-containing equipment (thermostats)	D	D	D
-515(4)	Used mercury-containing equipment managed as universal waste.	D	D	D
-515(5)	(e) Used oil mixed with mercury managed as dangerous waste.	D	D	D
-515(6)	Containers of mercury-containing equipment closed, labeled, & compatible [ref 40 CFR 273.22(c)]	(D)	D	D
-515(6)	Oil spill cleanup [ref 40 CFR 273.22(d)]	D	D	D
-515(6)	(a) Containers of mercury kept closed to prevent releases to environment.	D	D	D
-515(6)	(b) Mercury-containing equipment managed to prevent releases to environment, containment provided.	D	D	D
-522(2)(a)	Antifreeze identified as "Spent Antifreeze" and kept in closed containers, compatible, and protected from precipitation, secondary containment structures	D	D	D
-120	Recycling requirements at facility.	D	D	D
525(1)	(b) Regulated quantities of recyclable materials in accumulation identified.	D	D	D
-505(2)	(a) Recyclable materials managed in a way that is protective of human health, compliant with sect. 170 through 230	O	D	D
-505(2)	(c) Applicable DW is managed in compliance.	D	D	D
525(1)	(b) Precious metals managed in compliance with requirements	O	D	D
-145(2)	Spill cleaned up immediately; the environment protected	D	D	O
-145(3)	Spills or discharges of DW or hazardous substances appropriately controlled	IZJ	D	O IZJ
<11 KU or <2.2 K Lamps	-573(9)(a) UW managed in a way that prevents release to the environment.	O	D	D
<11 KU or <2.2 K Lamps	-573(10)(a) UW properly marked "Universal Waste" followed by the word "Battery" or "Lamp" or "Mercury-Containing Lamps".	D		OD
<11 KU or <2.2 K Lamps	-573(11)(a) UW may be accumulated up to one year and document the time accumulated, or provide exceptions at -573(11)(b).	D	D	D
>11 KU or >2.2 K Lamps	-573(29)(a) UW managed in a way that prevents release to the environment.	D	D	D
>11 KU or >2.2 K Lamps	-573(30)(a) UW properly marked "Universal Waste" followed by the word "Battery" or "Lamp" or "Mercury-Containing Lamps".	D	D	D
-640(6)	Daily inspections of tank systems (above ground).	D	D	D
-640(5)(d)	Tank adequately labeled with major risks [ref by -200(1)(b)]	D	D	D
-640(4)	(c) Secondary containment for tank systems, leaks removed within 24 hours.	D	D	D

Facility is LQG of DW (generated > 2,640 lbs / 1,200 kg): YES [f8] Complete LQG Checklist

Notes:

Washington Department of Hazardous Waste & Toxic Reduction Program

CHECKLIST SUMMARY OF VIOLATIONS FOR LQG GENERATORS OF HAZARDOUS WASTE (Page 3 of 3)

EPA RCRA #:	Facility Site ID#:	Facility Name:	Inspection Date:
WAH 000 025 256		KP McNAMARA	10/08/08

LQG Generator Dangerous Waste

Inspectors:
Dr. Willis Sims, WRO, HWTR.
Doug Vance, Water Resource Protection

Instructions:
1. Violation of the checklist is cited as a result of the inspection. Not to Comply.
3. Document that the violation has been corrected by the Ecology Field Inspection Certificate.

Facility status is evaluated for each item on this Checklist as follows:
V=Violation NA=Not Applicable PV=Previous Violation (from a previous inspection)

WAC Code		LQG Requirements (Generates more than 1,000kg/2,200 lbs/270 gallons per month of HW)	Facility Status V	NA	PV
[illegible]	[illegible]	[illegible]	181	D	D
[illegible]	-330	The training requirement [illegible]	D	D	D
	-330(1)	A program [illegible]	D	D	D
	-330(2)	A DW training [illegible]	D	D	D
	-339(2)	A written [illegible]	D	D	D
	-330(3)	Personnel [illegible]	q	D	D
[illegible]	-350(2)	A contingency [illegible]	D	D	D
	-350(3)	Contingency [illegible]	D	D	D

Notes:
The training [illegible] contingency [illegible] previous [illegible] inspection.

WASHINGTON STATE DEPT. OF ECOLOGY

Washington State Department of Ecology Hazardous Waste & Toxics Reduction Program

Internet address: http://www.ecy.wa.gov

Southwest Regional Office	Northwest Regional Office	Eastern Regional Office	Central Regional Office
PO Box 47775	3190 - 160th Ave SE	4601 N. Monroe Ste. 202	15 West Yakima Ave Ste 200
Olympia WA 98504-7775	Bellevue WA 98008-5452	Spokane WA 99205	Yakima WA 98902-3452
Phone (360) 407-6300	Phone (425) 649-7000	Phone (509) 329-3400	Phone (509) 575-2490
FAX (360) 407-6305	FAX (425) 649-7098	FAX (509) 329-3529	FAX (509) 575-2809

NOTICE TO COMPLY

1. You must complete items, and send the Compliance Certificate within 30 days.
2. A re-inspection may occur at any time to verify correction of violations.
3. Formal enforcement action is possible, with penalties up to $10,000 per violation.
4. Correct the following violations, and take measures to avoid future violations at this facility.

Inspection Type: CEI ☐ CAV ☐ CDI ☐ FUI ☐ Other ______ PAGE 1

(Compliance Evaluation Inspection; Compliance Assistance Visit; Case Development Inspection; Follow-up Inspection)

Facility Name: **KP McNAMARA**	Inspector (Phone #): Dee Williams 360 407-6348
Inspection Date: **05/07/08**	Inspector Signature:
Other Inspectors: **Noel Batt, SWRO-HWTR; Doug Wise, Vancouver Water Resource Protection**	State ID/EPA#: **WAH000022556**
Site Contact/Title: **Terra Dutch, Manager/Operator; Site 360-695-2455 Cell 541-377-3088**	Other Contacts: **Kerry McNamara, Owner 216-361-895; Bret Jorgensen, Creek Environmental 503-692-8118**
Site Address/Zip: **50 SE Marine Ave, Bldg 5, Ste B, Vancouver WA 98661**	

Violation Code (WAC 173-303):	Written Summary of Violation and Corrections Required
-340(3) -630(5)(c)	**WAC 173-303-200(1)(e)(ii) -340(3) and -630(5)(c): Maintain a thirty-inch minimum aisle space between rows of containers used to accumulate dangerous waste. At all times maintain adequate aisle space for unobstructed movement of emergency personnel and equipment in the facility.** Observation: There were ninety-two totes located along the west side of the warehouse. These totes were set too close together without adequate aisle space between them, limiting access to complete the inspection. Required Action: Upon receipt of this letter, separate the totes so there is at least 30 inches of aisle space between rows and so that any one container may be accessed. Aisle space must allow for unobstructed movement of fire protection, spill control and decontamination equipment and emergency equipment. When you return the enclosed **Compliance Certificate**, include photographs showing aisle space between totes containing

-173(3)	**WAC173-303-170(3)(e)(iii) and 173-303-200(1)(c)(iii) Waste shall be shipped within 90 days.** Observation: Attleboro has stated that they will be changing their WAS (WAS 02) to reflect a change to 90 days. Several other measures have also been implemented to ensure compliance with the 90-day limit. Required Action: Provide evidence that the WAS has been revised to reflect the 90-day limit. Provide a copy of the revised WAS. Provide evidence that the revised WAS has been disseminated to all employees. Provide evidence that the 90-day limit is being complied with.
-172(2)	**WAC173-303-170(2) and 173-303-200(1)(c)(iii) Hazardous waste "Hazardous waste" Dangerous waste shall be identified as dangerous.** Observation: The facility has stated that they will be changing their WAS to reflect the proper identification of dangerous waste. Attleboro has also stated that they will be changing their WAS to reflect the proper identification of dangerous waste. Required Action: Provide evidence that the WAS has been revised to reflect the proper identification of dangerous waste. Provide evidence that the revised WAS has been disseminated to all employees. Provide evidence that the revised WAS is being complied with. Certification that the revised WAS is being complied with.
-627(7)	**WAC173-303-200(1)(f) and 173-303-630(7)(a)(i): Provide adequate secondary containment system.** Observation: Otvieb Rd. Loading Dock is not adequate. KP McNamara has stated that they will be installing a secondary containment system. Certification that the secondary containment system is being complied with. Required Action: Provide evidence that the secondary containment system is being complied with. Provide evidence that the secondary containment system is being complied with. Certification that the secondary containment system is being complied with.
-321(1)	**WAC173-303-320(1) and 173-303-200(1)(c) Provide adequate frequency of inspections.** Observation: Stipulated that the inspection frequency is a weekly count-down to the next, interim, and final inspection. Attleboro has stated that they will be changing their WAS to reflect the proper inspection frequency. Required Action: Provide evidence that the WAS has been revised to reflect the proper inspection frequency. Provide evidence that the revised WAS has been disseminated to all employees. Provide evidence that the revised WAS is being complied with. Certification that the revised WAS is being complied with.

-145(3)	**WAC173-303-F1a4i5l(u0r)et i g p t o e n e l e a s e s .** Observ aSp iiwdenlrsseo b s a r v e c u d - d o t a e n s d h e w r a e s s t r p o l m e g n o l o d o n s t i h b e u i l (d q i u p i g t s e s o i r b i l g y i f n r a d t r h i s e p g T l h l e y w r a e a s r e l e o a f s i e q u f r o m s t i h d w e a r e h p a s e d i v a l t y o i h a e g r e a a h o e v e r d l e a A l s s o R e s i w d a u a e l e s b s e o v e z d i n g r a l i v r e c s t s e t s o r u e t d s i d e Requ A c e d i b m n s e d i i a n t s e i l e n y s a i n d o d e u t s a i r d e a r s m d i t i a g n a y t e d e l e a s e W h e y n o r u e t t u h e e m c l 6 s r e p d l C a r n d c i p f r i c c v a i t d e e , s c o r a i n p a y t c i t d i r o n t a k t e o n l e a s n p u i p A l l p s c o v a i d e l e c r o i p h t a i o t n i w c i b r e s l a k t e p n r e v e n t f u t r u e r l e e t a d s h e a e s i o r t , d h g e r a c v u e t l s t h d e e b u i l d i n g ..
-950(2)	**WAC173-303-F9a5 0t(u0r)e v a e p e r m i a t c c e t p r t e o a d t i s p o s l a n g e r o u w a s t e .** Observ aF o i U l o n m o s n :- e t m o p t w t e y s s ' e t o o r u e t d s K P M c e N a m a w r a a r ' e s h o u s e T h e t s e w e s s e t o a r b e d w n i g d t h h t e o r t a e s r i f v r i o m f g f e s s i s t e m h a e s t f o o t u e r w e r r e i " o e t m p a t s d y e ' f ' i i . W e A C 1 7 3 - 3 0 3 a r 1 6 P M (c 2 N a m o a p r e a r a s t a e d d a n g e w r a o s u t t s r e e a t s m t e o n r a t a n g d l e s p f o a s c a i l l i t y . Requ A c e d i b m n s e d i c a e t a e s h p e y r a c o t a i c c c e e p t o i t w e i g h t a z a r r d e o s u i s d u u n l e l s s t s o e t a r e e m p a t s d y e f i i W e A C 1 7 3 - 3 0 3 D e l s 0 g t 2 h a e d e l o w i n w a s t 1 e a) t o c t e n k n s o w h i a d s 2 e t) w t o o t o e f i s n k n o i w q (u m i a d r a k s e d ' H B F u l a e n 3 l " .) a o c t e n k n o i w q (u m i a d r a k s e B l u s a D r e " s) i g m a u t n i e c e t n t h e . W A C 1 7 3 - r 3 e 0 c 3 u i r W h m e y m o t r u s e . t t u h e e m c l 6 s r e p d l C a r n d c i p f r i c c v a i t d e d e s i g n a f o o t m E a c t o b A d p p o o v i n d f e o r a n l a c t t u h t o e n i o g f i h n e a s t e (i w e e i a t r r o n e e d i n w l e e i n w e a s g e n e r a n t w e h d t y) h w e a s w t a e s c c e p a t e d K P M c N a m a r a . .

Other Requests

WAC173-303p-r2c2vOEi(cc3e)lswoigttylhaeu t h b o r e i c t u y i e n s f t o r a n s a p t e i o n t a t o i h d e s i s p o o s f i t w a s W h e y n o r u e t t u h e e m c l 6 s r e p d l C a r n d c i e a f d i d c r a t e h s e e s , l l o e v q u n f e g o i n h s f o r m a t i

WAC173-303-07D e-S W i a g s n t a E t c i o o l n o n g d y e r s t t h a a n t i d s s e h w a d s t e e d m e s i g a n s a t e s t a t e t - o o 2 n a l n y g e r o l T , h J i s s a s w a i d s l e s l e e n t M R P S e r v a i n c t e r s e a P t r e i t d o . r e a t m t h w e a s w t i e b l e h e l a l s t o r t a a g a d M R P a n t l e s t t d e e d t e r m i n m t e n e e t t h s p e f o f i l e c h a r a c t e r i s t i c s .

P l e a p s s e v c i o c p e i o f e s a e n a l y t e i s g a t h e r f a o t r e d c r o s K S P M c c N e a c n k a s i r h a i g p s t h e n t h e e s t a b M R R P h r e o d P i r l o e v d i a d f e e a r a c s h i p m e a n a g e s d i t t h e r d M U R g P l s , t a r t i n S e p t e 3 n 0 2 2 , e 0 r 0 t 8 h r d N u o g v h e m 3 b 0 2 2 , 0 0 B t f . h a i n s a l y d a i d e a n s o e t x i t s h t e , m o v a i d e d e s c r o i p h t a e i n c a n l p y r s o i v s b i y M R E t e n s K P M c c N a m a w r a a s ' t s e m w a t e t h e e s x i s t i p r o f i l e .

WAC173-303-2a0 0 (yr1e) f(ebr)3e3n0c(eW) e k l l n y s p e c M i r D . n s c h w m a a s r o n d u c t i n s p e c d i a o g e s w r a o s u a t s e c u m u a l r a e t a i u s t h e l y n d o a t d e q u a e t p e t d h r e b o n d i i t n i o t h f e a c i l h e i y n d (i t c l a e d w a e s d e q u a i t s p e a c r e v d a s h t a e r d o b t e e a n c c u m u l l o a n t g e e . t h a 9 0 - d a y s) . .

P l e a p s s e v i n d f e o r a n l a c t h u i o t K r P M c N a m v a i r a l a d l d r t e h s e e s o i v r e a d e q l u n a c c l y u . d e i n f o r a n l a c t a u i n t o y m a n g p e o s l t i i m a y i o n p i r n a g c t t h i w a c i t t e l a l p e a c e e n s t a o d e q u a t e i n s p e c t i o n s .

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 7775 Olympia, Washington 98504-7 (7376500)7-6300

September 12, 2007

CERTIFIED MAIL
7007 1000 2456 1725 2

Mr. Kerry McNamara
KP McNamara
397 Hamilton Ave
Cleveland, OH 44114

CERTIFIED MAIL
7007 1000 2456 1726 9

KP McNamara Wa, Inc.
503 E Mariana Ave
Vancouver, WA 98661

Re: Compliance Cotmipolnet KP McNamara, WA Vancouver
WAH 000010603

Mr. McNamara:

Thank you for your Septem 12, 2007 when compliance was packet Pion McNamara Vancouver.

As you know, we visited the Dangerous Waste Regulation Consent KP McNamara August 2007. The most serious of the violations was a lack of immediate Action. Let the waste forward deliver the Pinal Manager for warranty of that letter by our September 5, 2007.

This stated dressers matching plans were identified in Vancouver facility. The enclosed Receipt document may be observed and concerned. The Report claudiest Compliance on the Wash Ecology's Hazardous Waste Management Act (RCW 70.105 and 08905) up to $10,000 per violation.

Have enclosed a regular document and a copy of the Dangerous Waste Regulation Thiions for Ecology's Hazardous Waste Management Act www.ecy.wa.gov.

Please contact 360/407-6348461@ecy.wa.gov for questions. Also, we will be able to provide your consultant to assist.

Sincerely,

[illegible]

Dean R. Williams, [illegible]
Department of Ecology Southwest Office
Hazardous Waste Toxics Reduction Program

Washington Department of Ecology
Hazardous Waste & Toxics Reduction Program
Compliance Report

Site: K. McNamara **RCRA ID:** WAH000022556
Inspection Date: August 1, August 1, September 12, 2007
Site Contact: Jeff Hugh (General Manager)
Kerry McNamara (President/Owner)
Phone: 360-696-6423
Site Location: 5503 Mariner Avenue, Suite B,
Vancouver, WA 98661
Generator Status: LQG

Ecology
Lead Contact: Dwight Williams, HWTR - SWRO. Phone: (360) 407-6348
Other Representatives: Natalie Sayhakhounmany, HWTR - SWRO
Douglas Cidy, Vancouver Regional Office (360) 696-8008

Report By: Dwight Williams _____ _____
(Sign) (Date)

Background

KPM McNamara Trading Corporation (KPM) is a small business located in Vancouver, Washington. The company was operated several facial circumstances. The Vancouver facility maintains a variety of hazardous waste streams, which are managed under the control of Kerry McNamara (owner/president) and Jeff Hugh (General Manager).

The Vancouver facility is a generator of 200 to 1000 kilograms per month of hazardous waste including a variety of toxic, corrosive, reactive, and ignitable waste streams, including:

- Waste solvents (chlorinated and non-chlorinated) generated;
- Waste water derived from washing the cleaning tanks and the site floor;
- Waste paint and paint solvents from painting the building;
- "Dirty" absorbent materials (oil, paint, solvents) from the building;
- Salt-water waste generated when washing and cleaning the parts washer.

KPM McNamara has a RCRA Small Quantity Generator (SQG) compliance history. Previous inspections in March 2005 discussed storm water pollution (see inspection report dated 12/20/05).

This compliance report discusses the inspection activities and compliance status.

August 1, 2007 Inspection

Conducted by Dwight Williams and Douglas Cidy.

This was an initial announced inspection, not a compliance evaluation inspection. Mr. Williams arrived at 9:30 AM. The inspection was scheduled by Jeff Hugh (the Director of Operations). Mr. Williams presented his credentials to Jeff Hugh (the General Manager). Mr. Williams explained the purpose of the inspection to Jeff Hugh.

h a b d e e w r o r k a i K n P g l c N a m l a e r t a h s a y n e a H r e o f f e e e s c t w o s t h r o t u h g e a c w h e t y e , w e m a d t e h f e o l l o w i e n g y a t i o n s :

11 A l a r p g p e r t o f t h w e a r e h i o s u e s c e i c t a b t o s t d e o r (a s g f e e g A u) T e h e w r e e r s e e v e r a l t o t s e t s a c t k h e r h d e i e g h s t i h t b e e u i l M r i H n u g g h s e a s i h l e t s o e t c e o s n t a ' i n r o e n d - h a z a r d p i g m e f r r t c s o n ' n c d r y e e T s h . t e p t w e e s d e e s t t i b n e e l d a i c n u e t d - , d o s w e n o f a h d s i t e . E c o l p o r g e y v i r o e u v s i l e y w M e S c D S c o s r o m o e f h e p s i e g m e a m t d e n , f i t r h m a t e t r e e s i d u e w a s o n - h a z a R h t S i c e l u r i s v h i a c r e d s l l i e s s p o s a l .

a T h e w r e e r a f e e c w u t - d o w r e h s h c e e n d t e h w e a r e h (o s u E s i e g A u) r e h e c y o n t a i n e d . s m a a m l a l . (u l n e t t h s a n . r é ¼ d " -) b r r e c o s w i T d h u e e w r æ a s s t r p o e n s g t i c o i d d i e n t - h l a i i r s k e l e a . a s v l h e p d r o d b e s s i c d b e n s c d r y e v t e e r b e e i m m a g n a g e e d o u b l e d d d t o g o e d o r . M r H . u g h s e a s i n d i g h t f h b " e P e p t s c e t T e h . e w r æ a s t o n t e e a t b h a t a D O T p l a c r d i n d i c a t e 9 E M S r g h . u g h s e a s ' l P e p r s e e s t i W d a n s e a n a g e f d a s l i a h e g e w r a o s u s e . M r H . u g h l e a s f e a r m e e d M S D S r P e p s S e e t e . P o l s n t s p e N c o t t i e o s n 0

• T h e w r æ a s t i l t a - n t c l a o b m p e a l c o t c o a r t e l a 9 h r d e o r t h c w o e r s n f e h w e a r e h (o s u e s e e F i g A u) T e h e w r e e r s e e v e s m a a l l ! o ' n t s p f e l l a l o s o u t h e d c s u i p a n r e b h o t t u , h i w t e s r e . c o a i t n e e d s i M r H e u . g h e e x s p l a t h t a e t d t e o s n t a n i o n n i - n h g a z r æ r s d i a c d u l e s e a d e d o n t b t e i l t a - n t a a r h a e l l e , o t w d e r d a i n a t r o o t t h o e t K r e P M c N a m m a a r m a a g i e t s o l t o e f s f - s i t t h e r c P u h g i S l e i r p v i c e s .

11 T h e w r e e r f e o 5 u 5 - g e l h l u b m o e c a a t l e o t d h h g e . o c r e t n h t w a d a f l h w e a r e h (o s u E s i e g u r e A) T . h v e a w l a p s l a c a a r s ' d w e a d s t e r a a r g e d d l ' H . u g h e e x s p l a t h a e t d r u m c o n t a ' P r e e p l d s b e n t d e r u c m o n t a ' P r e e p l d s l a e ' r t ; t d w o b r u m o s n t a i n e p d a i d h i . t l e . - b a s s a i d o u l d r u w m e s n d e a n g e w r a o s u T s l e d e r u w m e s m e o l t a b e a k s l e a d h n g e w r a o s u a t s r e d d i n d o h t a v a r a e c c u m u s l t a a t r i t o T - n d e a y t e c e l o s e v d e r s e i t b i O n a g s e p p i a l l l e t .

• T h e i r a e l a r s g t e a i s n t l e e a l k a c a i t h e n d o l r e t h c e a r e n f e h w e a r e l a (o s u E s i e g u r e . A) M r H . u g h s e a s i d o l o n t a v i a r s w e h a d t a e n r s l o a V p e . l a d l e t e r m n h i t a n h t e a h k a a s t l e a t s v t o c o m p a r o t m m f e e p n r o t s a s h s y h d . r , d ' 1 x c m a d u (s p t 1 H 4 c l) " ; , a l s n e d c o f r o d r . Z E P " s o (a p 1 " H 0) T h t e a w l a p s i p t e a d c o n v w a y o r h a d l o , c a n t e e a d T h y e . l a c o o u t h d : t a w l a s t a i w r h e i d t e w - i g d r h e i y e d r e s p i d l u e .

11 T h e o n v w a y o r h a c k n e r t h a s o t n h g e h s e i a d s d e t h w e a r e h (o s u E s i e g A u) r e T h e a c k o n f i w g i u a r l h e o d g n v e l y s a i t a t b s o t v w n o e t w a a l s ' h a n T k h s e . r a e n ' s e l e v w a a t l e k d t w a y a s o t n h g e a s t d é h w e a s t h a n k s . P i a p n i d h a g s , K i e v t a t l e v r e s s i n t e a h w e a l k . - T w h a e y o n c f r l e d t e h a i r s w a s t a i w r h e i d t e w - i g d r h e i s y e p d i l l r e s i T d h u r e e . t t a a l n c k o s n t a d i a n t e k d q M r i H d u . g h s e a s i d t a e r k e o a d e d t b l e . . c o n v e y a r r i e n a r s n i e d d b o a p v e n t e a r t k h p n o v e a d r d i r w i s v t e a d t o e v r e h e s e c d t r a d W k a . s w h a t i e t s r h e e e t u t r o n s e e d a l l o t w d e r d a t i a r f l d o o e w b h i r ç u h n s n o r t h a r s d b i . u s t d h t h e a f r l g o e o s r a t s h s e n p u e t n h d f h w e a r e h b W u e a s e k s e e d v e r a l q u e s t a b o w u h s t i t c o h t a e r s e l e a a n r e v d h , i w c a h s t a e r d e r c ; t t o i h e e e n d M r H . u g h e s d i n d o c t l e a i r s t y i w n h g i w c i a h s h w e s b l e d e u s a e n d d h , i w c e h d e u m p t e d d h f e l o o r s u m p .

11 T h e a r r e t e w l o a r p g p e l a y n l k o s c a i t h e n s e o u t h c e o a r s n f e h w e a r e h (o s u E s i e g A u) r e T h e t s a e n s k i i s h s a i c d o e n t a a i r r e o e a u d , t l b i y p t e h d r o e e t - o f h c w r a e T T h e . e w r æ a s h o s e s i t i t n i s n t i g h t b e e r m a e r d e M a r H . u g h e s t h t e a n i h k a s d e c e b n e t e l m y p t a i r e t d h , e w a s w t a e l s a u d e a d s h o n - d a n w g a e s r T o h u e s i r a e f l s o m n l p o c a n t e a d h d e t a n k s . w a s o v e w r i e a d h m e t a l l m i s d o w , e c h o u l l e d b n s ' e t r h z e e n d o f h i s e u m p .

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- Thteitlatahedompawcetroersean,tdhewreersee vecrudatolwtnotiehshaereAa. palolkeittltwyaseear1b\H/uigrhseashiesometaidhdeskeilttytoesiichue totaensdd,eusesrsiptitldlhfelloTdhre.kiittsteyft (onshtohveehatedbrtufmor manifesfaisinhgzarwdaosutTeh)e.otek(pltytisseom)prebsasnedalen,sdlent offt6Shtfeacarecycling.

- Wedisculhsostvehwdeaswhatreer-cirscyuslttaetmrMdsnH.ughweassoatbtefully exphaowtrhreintsaenwkesrceonnetcotheeed-cirscyuslttaetmrd,imdoftuelxlyplain whatypoefwsasweesdeischtadrhgfeelobor MsHuumgph.esnosrtatahdok",dirritnyse tanwka"s,sevchetnotaerfseiwrasthoeudWeusepdHpatedretshtleiqiumihdeank,

- an flo utnhdiahtta adp Hb 6 o 7 Hes a fi ldwi asswtæs s o me d ri an ei sm et dbr uam m d m a n a g p e f d -o s i w t t e u m p te d d h fe l e o m p .

11 Th se o u t t a h r o k u , c l r e i a m t a e w k a t s s e f d b t r h f e i w a s h - W e w s n p d H p a p t e o r e s t t h l e i q i u t h i h d i a s m a k n f l o u t n h d i a h t t a a d p H b f 3 o f 4 M r H . u g h s e a s c a l u s b d a { p o t a h s y s d i r u m a x n i s d b e a c) a b n e d i s p e a n b s o e v d e t t h a e m a k n p d h m a i t g m h a t k t e h p e H h i g H h e s a f d i s w w a a s s o t m e e t r i e n - e c s i r o o d u r l a i t t m t e e h d f e l e o m p .

- B o t r h i n t s a e n c k o s n t a i n e T d h e l i r d q y t s a e a k s o n t a n i i n l v k d y s , c s o l u s d M g r e . H u g h s e a s f d l w i a s s i l - p b a a i v s m e t s f t r e a . t m o t H e e s a f i d t e o p t e r w v a d l o f u o t u r - i n c b é e s i H d l e s e a h e p l a n t n s e h d o . v t e w h a e s f t r e d r m r e i r t s a e n k d i r n u t m o s l e a n d i d t f f a s d i a t n e g e w r a o s u t M e r H . u g h c e o s u n l o e d t x p w a h l y e t h o u t g h p e a t i w r a t s w t æ s d a n g e . A d u m s e r m d e i s c u i s a t s p i p o e n a t , h l M d H . u g h d e i s d o k t n c h w o w d e s i g n a t e w a s d w e h , a v b u m l a d k a e w a s " t d e a n g e o m c o u t s . "

11 We d i s c u t s d e e f l i o f t é r a p n t d y n c é o m p a p n r y o ' t s f o o c r o l r é p é t e h s a i t r e g ' t " e m p M r y H . " u . g h i e n s d i c l a i t t f e h d e o d t c e n t a l i e n t s s c a n i n c h e s i t d h u e e n t , a s c o n s i e d m e p r W e g d a . s k i e t f d h e y é a k e t w e i s t o r t e h a n i n a o n f h e s i a d n u M e r , . H u g h s e a s f d r e y g u t l a a k r e l t y e s i p w s i e t o v h e i n a c h e f s o o p t r 9 d i u n c s t i d e .

11 A f l o e a n p c p h e a t o e e d h t a a f é i w n c o n f é s q t u h i l e . i d g h i t h h b e u g i l m d a i d i n e d g i f f i c u l t d u d b s y e t r h v e e n d o f h i t e r n e . n . c h

- T h e o n c f r l e d t e e d p e i r p f e i s l , a t r e v d r a s l ; (v l e s c o a n t t h e e a s t d é h w e a s t h a n w k a s s) b a d s l t y a i T h e d r . i r e e d s i o d t u h é e l w a w s h i t e / g o l e a e n d e v e y a a w d i s d e .

- We · i 1 1 t s l p f e l o s t o e m d p o , c a a t t e n s e o u e t n h d f h w e a r e h o l d t s e a t a l i i n q v e i d i d h b r o w n / v b i l s a c l o c k u y , T e h r e w r a e s l i q m u i i l d k , y l - a v y b e i v r a s b t e e l t o h w e r o w n / ' b l a c l v i s c l o a u y A e m r d h e a r p e p e a b e s d e v e i n e c d é s s c s o l u s d g l a b e o t W o e m . c o l l a e s c a t n e p d l r e y t i o n a g p t a u l t r h e r i e a e y W e f s i d e l t e t s h p e e l a n f l o u - n t d h l a e t w a s h t a e a d p H b f 3 o f 4 c l a s s i a t f D y a i n n g g e W a o s u t s T e h . s e a m p w l a e s u b s e q u e n t l y l a b e a h e d l a c a e d o o f l o e m f f a s a t y . s i s .

We c o n c l o u u s r é d e a . n t m d e u t h h o e f f l e c x e p . l a t h n a l e w e a s t t e h f e i l s o m m p e e d t e o d b e r e m o v e m d a n a a n g d e f d a s d i a t n e g e w r a o s u t s e a . i w d a s l o n c e t r h n a e h d e i g H c o u l d h a v i e n p a c H c e o d n c i r t e h t s e u m s p c t h s e y s t s e h m o n d o b t e u s e u c h t i f e s l v a l u M a r t e d . H u g h s e a s i d u n h d e e r s a t h d l e v d o µ c l I d e o a u n t h s e y s t e p m l a w n a e d s i t a e t o t e .

M r H . u g h p e r s o v u i s v é a l d h o p o y f h b e i o l f l a d f i c n r g h m a z a r w d a o s u t s a e t E h i r e c o r d i n d i c h a 5 a 5 e 0 d 0 - g o a v l a l s o v t r a e s t w e a r m a n a g e d t o f f P u a s c H P t d e i w V é a r c r M a y , 2 0 0 M r H . u g h s e a s P h d i S l e i r p v h i a c p e r s o f t i h w l e a e s d M e r H . u g h a e l s g a v m e a c o p o y f M a n i # f 0 e 0 s 1 t 6 9 J 1 J 2 W 5 h 9 i w c a h p s r e v i r c e u v s i k e y w e t d h A e u g u 1 s 2 0 0 i 7 n s p e c t i o n . E c o l l o a g t y a r w k i e t d h d e i s p o o s m a p l a b o y t u h t w i a s s s t h e i p m (é A d e g 2 s h t o t e) .

We d i s c u E s c s o e l d c o g y n b s a b o a s c t c e p t o i t t r e h g a t ä e r e p l e y x t p ' l . a t h n a l e w i a s s p r e v i o u s l w y i K d F M s b l a m i a 2 0 d 0 E a . l s o p l a t h E a e t d l w o a g s y o n c e a r b n c e u d t w a s d t e s i g a a n d i m d a l m e a g e o m f e m o t n - h a w a s d l e s a s i " f d l l o w t h u e p s e . i s s u m e y s c o m p l i r e a p c e t .

August 21, 2007

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Septem02e0r07 Follow-up inspection

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caus s b il cutt o ih o e h s o m p M r M. c N a m s a a r h a e d i d p n l ' a t b a v c e a u s t i l c t o i n o - n s i a t r e n y o r e .

11 M r M. c N a m s a a r h a e h a c d o n s t r d u r c a t w i f o t r g h s e u i l l d i e s n a g f . d t e r e a n r c s h u m p w e r e e p o c x c y a t M e r W. i s s e a h i e v o u l l i d a k c e o p y t e d r a w i a m g M s M, c N a m s a a r i a d h e v o u i l n d c l t u h d e w e i t t h r e e p f o r r 6 t m e e k s i d e .

11 M r M. c N a m s a a r h a e a r r a i v t e a f e a c a i r l M r H. u g h h e a s d l e a e n v e e d r y l t H e s i a r M g d .. H u g h t e o s h l i d t m h 2 a 0 0 - g a w i a e h t a s d e e p n u m p o e u d t f h f e l s o m p h w a s w t a e s p l a c a t d o M e r H. u g h h e a s d l s b e a t n h e e d a c u ? m p d r o c p e u s m s p s .

11 I a s k M e r d M. c N a m a a b r c a i u n t - c d t m o i t a e n g v c , h f a t h p e o l i c f y c a l r w a e s p t b i t w e i g s t h r e s i d l e s e a . t h c e o m p a n y e p n e d a u r c l d , n t e s w h i t c o h t h e a s d b e R C R A m p t y w h e t n h e a y r i l v e f d l e t h M a d H. u g h h e a s d s c r a i c b c e e p t i w n i g s t e t a t v c e i t n e a c s b e s o i p a i t a s h e M r M. c N a m s a a r t a b o t s o t s e h s o u h a l t o e t a n c c e p H t e s e a d M. r d . H u g h h e a s d n ' t w i l t h a c e o m p a f o n , w e p y n g .

- I. ' a w s k a t y p e r a i w r a i s n v g a i M a r M. c N a m s a a r t a b y e f f e S S e H A r a i a m i d n g i n f o r m a t a d " u g t b e n m a e w r a a r l e n e s s . "

- M r W i s o e p e n t e h f e l s o m l p i T d h . e w r a e s b o t u w t i o n c b e i s q i u t i h s e u m l p l r . J o r g e s n a s f o b h e s e n s o u r m m p a s l a l y o a b f a o v e r d - i f a m a e r t h e o r l d - 8 a 0 b 0 o - u g t a l l o n o f i q u o i f d f . e t h a d t h b h u s e u h m m p u s h t a v l e e s a s p a W h e E n c o l s o a g m y p t l h e e d s u m i p h t , e b e l t w e a m n t d h w f o e e e w t a s a t n e a d p p e a n p e r t d h a a f l u f S l n o c n e l y 2 0 0 - g a w i a s w t e s r r e e m o v t e s e u ; m s p h o o r n l t a y v a e a p c c a i b u o y 8 0 0 4 0 0 - g a l l M o r M s c N a m s a a r t a b l s e u m w p a e s m p w t h y e h n e a r r o r s e i e t n e M r H. u g h t e o s h l i d m t h a n t 2 0 0 - g w e h r e e m s o v e d .

- M r M. c N a m s a a r v a a l s t w e s p e r o f o i n k e e a d c y h e a H r e t h o u t g h p e t o i f n i c l e a u r d e e w d i f o t r o x i c s t o n y s e o c r t f t h i a s t h t o w x a i s c o i n t e n y l t h w e a s s t t e s H t e s e a i r d t e s . c o m p l a a t y t e s w t a e s w h a t s e r v , e r a l a n e s l i d u (u e s a e t t d e h r e v a a n l) v T e h s i s i n f o r m c a u t b l i e d b a n d a e v a i t l F a b o i e 9 g . y .

11 W a s w t a e l s e i s n t g a g e d \ n h g e o r c t e h n c t f e h w e a r e h W u e s e t t e h d f e o l l o w i n g c o n t a i n e r s :

  - T h r t e c e t l e a s b e a " e n d b n a z a r d M o r M. c s N a m s a a r t a b l e t s o e t c e o s n t a i n e d " u n k m m o a w t n e " t r h i w a a t l s e i p n r g o f b i y P l h e i d H e s p a . f t b w e a s w t a e s p r e v i o u s l y s t c k r e e d a t h p e i g m t e o n t t e s x p l a t h E a e d l h o a g d y r e v i i c d u e s n l t y i n e s i e d t o t d e u s r i i A s g g u i s i t n s p e b a t s i k d e h d a h t t e o t b e e l s a b e a l s " e w d a s t e p e n d i d e s i g n a a n t r d i o a t s h h b n a z a r d N o c a u c s c " u m u s l t a a t r i t o a n s a d t a t e d .

  - O n e o l t a e b e a l s " e n d b n a z a r a l n o a u s s a d h e s i v e " .

  - O n e o l t a e b e a l s " e n d b n a z a r a l n o a u s s " ' p o l y m e r " .

  - O n e o l t a e b e a l s " e u d s o e i d M r " M. c N a m s a a r i a d w a t d h r i a s i 0 m 1 e , p l . r 1 o t d t u o c t t e s .

  - T w 5 5 - g d l t u b n a e b e a l s " e h d a r z d a o w u a s s t O e n " w . a n s a r k a e s " d P a l R t e s 8 - n 1 , - 0 7 a " n t d h s e e c o w r a d s a r k a e s " d P a l R t e t s , 8 - n 1 - M 7 M " c . N a m s a a r t a b l w i a s s t e w a R e p t s N e o r i l s a k b e l r S a r w k e e n t e h d e r u m s .

- On 5 5 - g a l h u l m a n b e a l s 'e s d o n l o i n d -, r e g u - l l a t M e n M c N a m s a a r a t a l w i a s s w a s a t d e h e s o i V f e r d d s m n t e i t a b l e .
- F o u p t l e a s o e ' h e a d z a w a l s o c a s u s M r M c c " N a m s a a r a n d t e o d c e n t a d i i m e t d y s o a s p o l u d t r i a o i o n e t d h w e a s t y e s t H e e s m a f l d i a w t t a p s r o b m a b x l w e y i d t h c a u s s b i l c b t e i c o a n u h s l e i m e a k l e e c r o n f b y M e r H d u g h e s e o d c e n t a i n e d w a s c t l e e a o n u e t d l h d e i r t p t s a e n 1 k e x p l a t h M a e H d u g h t e o s n e t h a h w e a s t e i n c l o u i d l e - p b a a i s n e t e o d c e n t a s i l n u a d g v e a s f t r e d r n f e l s o m n p M r . M c N a m s a a r a t a l d M a r H . u g h h e a s d i l t h t e i o s t e e f l o e a e r r i H v e (M r M c N a m a r a) h a t d h e a n d d a e p l p r o x 7 5 m a g e o l w y a o s r c t s e u s s b i l c t t o i h o e o t O e n . e o t e c o n t a v i a n s e t a e u s l t n i a e c i d u o t f h s e t a i s n t l e e a s k s .

- M r M c N a m p a r r c a p d s m e a d a a g l f e b t u o r t o e f s f a s c i o t r e r d a r i n g e w r a o s u t k s e s a i d h e c o u u l s d e h w e a s p t r e o p f r i e l v e i p o r u e s p l a y P e n d l i p B e e x r p v l i a t c h e a s t p a r t o f i l e w a s i t e d t h c e a u s s b i l c (t p i o o t n a h s y s < i ; u h p r r o e x v i i n c h o a u n) s a l g y e f d - l s s t i e t e e m . e d a p p r o p o r e a p e n o d f e i s l i e g v r a a s t t b e a s s c e n d h f e a t c h t M a r H . u g h h e a s c l o n f u s e d p r o c l e i s r a s e n v s l a s h e a k l e e c r o m m i n M g r M c c N . a m a a g r a e e d .

- W e d i s c u w s h s a t e t y d p e a o l k o s n u e r e e t t e b d c o m p l l e x p l a t h E a e t d l o g y ' s i m m e d A i c a t t l i e e n h f t o e c r u o s n e h d f e l s o m n p u t t h a h m e e t r a i l n t s a e n w k o s u a l d l s a v e t o n d e c r l g o o s u u n r l e s E M s c N a m p a l r a a n t n o e s d t e h e t r a i c c u m d a l a g e w r a o s u i t s n e t h f e u t M r M c N a m i a t r e a r (a a t g e a d h n a) p o t t h a e s h s y i d u r m s x o i l d w e t o i u o l n d b t e u s e d i n t h f e u t a r m l e e d i n d o a t n t i c i p a t d e a r g e e w r e a o s u a t s t e l h r e i i g m s e t a n k s . M r J o r g e s n a s C o d n e e k w s o i u a l e d d r t e h s e s W A C - 3 0 t 3 a - n 6 k 1 o 0 s s u t r a e n d f a o t r n h d e s f l o o r a n s c u r n e p r t h n e e a t l i . n t s a e n a k r s d , s t t h a e i s n t l e e e l s a s t t h a e n k e s n o d f t h i e w a r e h W e a s g e r . e t e n d a h t s e t a i s n t l e e e s l s t a a n l k s s e e t w b o e a d d r e b s e s c e a d u s e t h e n p s l t i k h e a l d y e u r s e t d a c c u m d a l a g e w r a o s u c t s i e r c u f l r a t h n e e i n t s a e n M s . M c N a m a a g r a e e d .

- W e w a l k t e a d o t u h g e h t s t i o s t e o r y a a g r M d r W . i s a e d d r e t s h s e e - d C o i n y c a l s o s t t o r t e e s i d d r u i e p o p d i r m a g i o n u i o t r v g a l w l e i s t l h t e o t a e r s e t o W e e d b s e a v t e d s v t o l e a k v i a r l g y r e s s t a t i o n h g e r a l v e W l e a l s b s e a s v t e d p o e n s g t i c o i d d i e o - n l e i k e a r e a f h y e a (d i m a l y e a t t r i b o u h t p e h b e l n e o l - f o p r m a d d N e o l s y g l e i f i c a n t s p i w l r o s e b s e o n t e h g e r a y w a e n N d o f u o l p l a r t f i u a l d l t w e s o e b s e r N v o e d x c a r s , c a r o g c o n t a c i o n t e h e e s n r c l s s t e d u a n g i w e e s i e o n s i e n t h y e a r d .

W e c o n c l o u u d r e a s p e c o t f i f o e n d . e d w a a c o n h p l e s p e r c e t p i o o t r m M . c N a m v a i r a a h c t o T p e y r r E a n c e h a m a C n r e e k C s o i n d s e u I W t e a t n t a s n e k v e e d r y o t n h e e i m a e l f t t h s e i a t S e : 0 0 p .

S e p t e m b e r 2 0 , 0 7

E c o l r o e g c y e a i n v a e l d y t e i s c i a t C n s l u n A l n i a a l y T t h i e s y a o w t e h d a h w e a s i t t e h f e l o o r s u m c p o n t a p i h r e a o b f l o r m a l d e h y d e l a y a d p e H , v e 2 . T 5 h . p e h e a o f l o r m a l d e h y d e c o n c e n t m r a d y t e a i t o t n r s i b E e t p a s t r e e t s i (d t u o c t P e e s p s w e e t r o e b s e o n e d a i n t a l e . d r u o m P e p s t r e e t s i w d a l s s e e i a n c g u m u l a t o e t d p e r r o d r u e c s t i d u e s .

R e q u e s t A d d i t i o n a l I n f o r m a t i o n

w A C 1 7 3 - 3 0 3 p - r 2 c 2 v 0 t i (h d a e) s t h b o r e i c t u a r i d d e i t r i e p r o (a i t h s l e u n d g i i m g e e p o i n t s , p l a a n n s s l p e c i f i c o a t c e t h m e s u r a g n t a n d t l i e s p o o s a i g t e i n c e n r d a t o g e w s a o s u t s e .

W i t h l 4 d h a y o f r e c e o i f t p h t i s p l e t p a e e y t h f e e l l o w f i o n g t m E a c t o i b o n g y :

- A p r o c f e l s o b s w a g s r h a o m w h i c n t w g h w e a s s h y s t i e m s e l d n c p u r o b e c i e n s s s t r u m e n t a t s u c a h s w a l b e a s k é t a t l e a r e m t s c ,.
- A w r i d l e e s o r o i f p h t c e i o o n t c r p o e l r s a t o r c e e m p e s t y r e a e i 9 n o i t n h g e e r c h a n i s m s p u i t p l a t o p e r e v t e h a e d c u m u o l d a a t n i g p e w r a o s u i t s e i n t s a e n t k h s f , l s o m r o p r s t a i s n t l e e s i s t h f a e u n t k u l n e c l a d e l e c r o i a p n t w y i a o s n t c e r e e o r a i n r a g l y s i s a c c o m p l i s d l e e s l c p w a i g t t o a h g f e l s o m p .

11 A s i p t l e a h o w i r l g p c t a a h t n e i d o o r l u o m p e r o c t e a s n s k e s c , o n c d o a n r t y a i b r e m r e t h n s t l t a b t l o e t , e m p r e d s a s n o g r e w r a o s u a t s e c u m u a l r a e t a n , d n o i t h l t e e g r u a i p m e n t h / a r e t h f e a c i l i t y .

111 A w r i d l e e s o r o i f K P M i c N a m a p r r a o 't f o o d r e o l s i g w a a S r t e e s n i g w a e w b a , t e a n s d , o t h w e a r s t l e n s c . l i u n d f e o r a n b c a w u t h t i o s h e s p o n s d i e l s l i e g w a s t w e h g s t , t y p o e f s w a s t a e l s e a a b n a l y z i e d l f u i t s i h o n a g s a s n a d y o w , f t w e a n s t a e p e r o f f i c d l r i e s d p d s t a l . a p p e t a h w a s a t s w h a t e r m o a v y e i v n a e s t , y f f p e r r o e d h u t c t a t e r s e i n s P e r c b . v s i p d e e c i f i c i n f o r a n t a c h u i o t w r h v i a s r i a i a s d l r i e i s t s h d e e s i g p a c t i c e s

111 A w r i d l e e s o r - i d p f t K i P M r c N a m v a i r e l a n l s u r e e s i w d r u n c e l t e a o c u b t c o m p r e s s e d t o t e e n s r o t u t o t h e e f f f e l e s t e n P a r t o i v i o i n r d f e o r a n t a c d 2 u 0 t 0 0 s n 7 h i p m (e d n a t t s e s , v o l u f m i e d , e a s t i t h a a t i n e s p a g n a d t e e s r c) r , o i l p c t v i c o m t a m i a n p r a e r e t v s e f n r t o e m d b e i w n a g s h o e f c d f o m p r e t s o s t d e u d s r s l h n i g p m e n t .

Compliance Problems

*The following conditions were not in compliance with Dangerous Waste and/or other environmental laws. Each problem is covered in three parts: (1) the **citation from the regulations**, (2) Ecology's **specific observations** to highlight the problem, and (3) the **corrective measures** needed to fix the problem. A 'Compliance Certificate' is included. It must be compiled and returned to Ecology.*

- **1 W A C 1 7 3 - 3 0 3 F - a 0 i 7 l 0 u r e e s i g w n a s t e e s .**

  O b s e r v a K P M c o N h a s m c a o r u a l o d t e m o n s t h w a a t s h e a s l e e f n u d a d q u a t e l y d e s i g p n a t t e d f d e s s p e n a l .

  R e q u A c e d E o n s l : d g n y m e s l A i c a t t L i e e t n (t d e a r A t u e g l 2 s 2 t , 0 0 r 7 e) q u e s t e d d e s i g i n a f o o f n c a r t w i a o s m n e a s a g e d f - T s h i i t s e f . o r m u a s t t o w p r o v i d e d w i t 7 h d i a n y o s f e c e f p l t e s t t t o e n r c , l a u n d y a s m t æ n a g e d f b e t w J e æ m u a r y 2 0 0 a 6 h A d u g 2 s 0 7 n f o r m a y t n o w a d s p t r e o f l i a l b e o s r a n t a o l a y y s d o s t , h e r p e r t m f e n n E a c t o i l o s g o y s i n t e r i e t s t d e e s l i g o a t n o o n - h a w z a a s r h d o u s w a t e g e d r l e b r y a t s e l d t i o n t g a e r s a) n , " y o n - h a z a r e d s o n d a u r e a s g e d f - s i t e .

Wi t 3h 0 -n dcoafyesc e f p lies tpt reorv, ie cs ei g in a f o o fm ca t rh fe co In l wo a v sis h t g r e a m s
t h va e t ro e b s e o v n e e b n S t e e p t e 1 m 1 2 , e 0 1 0 7 :

- " A d h e w s a i s v (t e r e " e s i i n t d o u t e e) .
- " P o l y w n a e s (t h " e e s i i n t d o u t e e) .
- O i r l e s i (d l u a e b a e s " l u e s s b e i d i l n " } t o t e .
- T h r t e e c e t o e " s u n k n w o a w s n t " e .
- F l c a o d r s b o e m m t x v e i d t t e a s i d u e .
- P e p s æ n t P l e p s l e l e t s i e d a u c h . i a 5 5 - g a l h l u m n
- S o a v p a s (t n e i w e d l h c i a n u s t i c) t o t e .
- S l u d g e m n t s a e n k s a t i o d c o n t c a a i u r s t p a c i w a n t s d t e)
- W a s f t e c o n a u s " p r o d a n o k " .
- W a s f t e o n h s o m m p i x v e i d t h c a u s p t r o d t u a n T t k h . é l s o m p w a s w t æ p s r e v i d c e u f s i a l n s y e d " c o r r d c a s n i g v e e r o u 1 1 s w a s t e
- " S o N l o n d - , R e g w a l s a i t t n e d " d r u m .

D e s i g n i a t f o o m m a y t n i c o l a u n d a l y t e i s c p a r l o s c k e n s o s w l M a l g e S r a i f a D a t t y a
S h e e o t p s r , e v i e o s u t s a l b y W a i s p h r e o d f f i r l a e n s w i a d s t e w l a a s h t d a a f u i b l e d l a , n g e r o u s
w a s m t æ n a g e f m æ c n i S l u i f t f y i n o f e n m m u a s b t e p o r m o v t d O e f d c i h m æ r a c t (W A C s t i c s
1 7 3 - 3 0 3 n - s 0 t 9 a 0 t) e c - r c i n (k e y o i a a n p d i e t r y s i s a t n e d l a e c e i n W A C 1 7 3 - 3 0 3 - 1 0 0 .

2) W A C 1 7 3 - 3 0 3 F a l i t E m u i t e i s g p a i t l e r l e s l - e o a r s e s .

O b s e r v a S t p i i v o l e n l r s s e b s e a v e o p r i p v e a s l , a v r e d s f n i e l a t h e e i r s t s a e n S s p i l l s w e r a e l e b s e a v e d n d c o t m o p t (r e r e s e s s v i e d s u o e z i n o g f h t e o t t e b s h e c o n c f r l e d R e e s) i w d a u a e l e b s e o v e z d i n g r a l i v t e s t e s o s t s r i e l e .

R e q u A c t e d W o i n t s h i n o 3 f 0 e - c d e a f y p s t i e s t p t r e o r v i , i n d f e o r a n l a c h u i o b w m p i l l s w e r c e l e a u n p e a , d h d o t w h e b y e p r l e v e i m t h f e e d t (u b r o i e t n h s a i n d o e u t s i d e . t h e w a r e h o u s € !) .

3) W A C 1 7 3 - 3 0 3 a - m l b 7 y 0 e (2 e) r 1 e 8 n 0 c F e 1 a) i : l t u p r r e o p p r e p y t a h m e a z a r d o u s w a s m t æ n i t f . e s

O b s e r v M a i n o # f 0 s 0 s 1 t 6 9 d 1 i 2 d 5 i 9 n c l a t u d a e n s r p a o m r p t h e o r m u e m b o e E r P A I d e n t i f i c a t i o n n u m b e t r h P a h E i S l e i l r p o v g i a c t e h S t e a r t a e n r s p d s e i r t h e g r r m , i E P A D W # A 0 0 6 1 6 7 2 8 1 2 .

R e q u A c t e d W o i n t 3 h 0 d l a y o s f h r e e c e f p l i e s t p t r e o r V E i c o b e l w o i g d y b c u m e n t a t i t h t a h m e a n i d f i e s s c t r e h p a l a s e e c r p o r r e A c l t s e o d t E i c f o y l a o b g o y u n t o y t h e r m a n i f (e g s e t n s e b r e a t t w e J a e m u a 2 r 0 y 0 a 6 1 A) u g 3 s 2 t , 0 0 t 7 h) n a t h y a v h e a d d i s c r e p a n c i e s .

4) W A C 1 ; 7 3 - 3 0 3 - 2 0 0 n W A C 1 (7 b 3) - (3 i 0 i 3) (, , 5 a) n 6 (4 6 0) y r 4) f e r F e a n i c k t u o r e m e e t t h d e a n g e w a s t s a e s k t o r r a e g c e u i r e m e n t s .

O b s e r v a K F M c o N h a s m v a a r a a c c u m u d l a a n t g i e w g a o s u i t s a e n i n - g r f d u s r o d n p , t w " o r i t n a s n e k a s a d l s , t a i n l e s s - s t e e N o r o c e f - h d t e a s e k y u s l t h a e a n d s o n t a n

adequsate conditions and rtya itnhmdeyndoht,a vaedequcate corporlosp,ae b ealnichg; thwy mneoptr opienrslpyetcot epdreevle matsoe_ntvhier onment.

Requ Actd Eccro:l dgnymesl Aicattlieo nter previtohoest ecyalnoasdufdrreess thfel s oamn Ecologdyi saclussbsecalho sofuhrei ntsaenaknsdtainlesaksted urtilmSeep te1m12,e0r0i7nspeTlhtfeoolnl.fowrichgueericstriocvnided:

11 Wit h 4 dayrs ecefpltetftiemdiescho ntarmhaisaks tEgmsloobgsyerved thsactmoefhwiosrwlasompoeSteep te1m12,e0r0A7nyes i(dvuavsanter) generbaydteecdontarmhlinteaaastkisntgreumsstepropaecrcluymualnadtteesdignate asrequiiWrAeC173-303-070.

11 Wit 3 0 dayosfecefpltestatnedfctleeaenaiosnhgsteevma,leuaacthenk systtelmeterimfiazerodoonusstiwteureenrtestadsheechvironhmiesnt. evalumautsnitoenfdthespuemrefor.msatnacondeafriidWsAC173-303-610(2 Pleaseetehaet taGuhiedlafmCorleeCalno solD.aJnrgeeWraosuffsacilities (Publ#0 4 1-)lon

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5)WAC173-303-a1r7 0 0 (2 1)yr(edf)er Eacdtuprreovailadbtehlat identi thmeajoirsla$sspcwiathlveasitmehcontainers.

Observ Ath eotaensdrumdsangewraosuatsecumualKaPMeNlamdaindot inclruidsakbels.

Requ Actd lommmedi uapbreelcyefprtespbarttepltaensdrumsdenthiefy ri(sikteexcjocr,rcestidW.ie)t,.Ph-ichasyusbmhdto-doctumecnttaatiinenrs havbeepnroplearbleybleedtthiemfnyedriiastke.

6)WAC173"303-a2r0d.(21)yr2)ferFeanicleudreevelopfcahadldwor writitnesmpesscthiedlogreenefraaclii hispyections.

Observ aSpiiwdenlsseobserved nodiuntsstihldsaerehanislatep,peatrte)dat operavteomeastwacrfeequirtemmietnisgpaitlheletsnhey caunrdlindoftollow. aimspescctheiodnfulhfeacility.

Requ Actd Woint3 0 cralechalydse,vealnodfpolal owwriintstpeescctheiodnoftre inspeachtbimigteoqruiinpgsmaefhaetnt,elymergency seeqcuudrpeimteyoctes, an operathsidhguequiratrhhdanettbpevdeentte,ctesptobnadzatrodhseublic headtlheenviroPhnmoevaictd.epyfhiirsspescctheiodnEctelogy.

.7)WAC173-303-2r0bDy(4 f)(e3e)3nFcae i ltuprreo vainale equpætresonnel traipnrionggrFaami.ltuprree paanmdea in tavari intpteerns otnmæilpnliaomgt,o maintaainimeiongrds.

Observ: Opie orradstimodosteeamb t e e f tihdeei f f eb reetnwdeeemg earnodus non-danwgaesraieedtsindo t a w e a n f e h r e i s a k s s o c w i a t t h e n . d e n a g e o m f e n t h i g h w a s t T e h s e d y i n d o s t e e m o n c e a r b n o s u p t i t k o l h f e l o o c a r b , o t u h t e a c c u m u o l f a i t g i h d - r i p q H u t i h d f e s l e s o m r u p n a d l d r e b s y S e e o d l W o g k d e i n d s o t s e e t m o n d e r a s r t d a i n d b a t d e q u a a d t e r l t e h S e a n g e W a o s u R s e g u l a t i o n s .

Requ Ace dWo ints3:0 d ra yosf e c e f p l t e s t d t e e v r e a l d c a p n g e w r a o s u t t s r e a i n g p r o g w r h a n s c h h a h b c l a w d e t t a r p n l i a m g l e c p r e W r A s C 1 7 3 - 3 0 3 - 3 3 0 .

8)WAC.173-303a n2l0r0e(f1e)r(e3n5E0a: i ltuprree paanmdea in taain adequCaotnet inPgleanmgelmergeprnoyedures.

Observ: A C o o n t s n P g l e a n a c s y n p o r t e p l a y t e n f e a c O p e t r y c t o c u r l o s s t e e m t d e m o m ; a f t u u l n a d t e e r s t o a f h f e a i c n i g l r i o t c y e . ' s s s e s

Requ Ace dWo ints3:0 d ra yosf e c e f p l t e s t d t e e v r e a l w c r p i c t o e n t i n p g l e a n m c y a n e l m e r g e n c y p s r e c q e u i d W r A e C d s 7 3 - 3 0 a 3 n - d 3 3 4 5 0 0 .

9)WAC173-303F a 5 0 t u h 2 e v a : p e r m h a t c e t p r t e o , a d t i s p o o f S a n . g e r o u s w a s t e .

Observ: M t r H . u o g h s a e c s k n o w l t e h k a E M e c c N a m s a c r m a e t a i c m c e e s p o t e t h s a t c o n t a l a m e g e w r a o s u t S e h t e o t w e e s n e o " t e m p a t s d y e " f i i h W e A C 1 7 3 - 3 0 3 - 1 6 0 (2 a n d t h e r K e F M c N a m o a p r e a r a s a e a l n g e w r a o s u t s r e e a t s m t e o n r a t a n g d i s p o s a l f a c i l i t y .

Requ Ace dlomnse:d ic ae ta es hpsyr a cotaicccee pt b itweigt a z a □rredsoiudsu e , unlesstsoeta eresempatsyle f iihWeAC173-303W16 8 0 (2) d o a f y e s c e f p t thliestptreorva,wd e d l e e n r o i K P F M i c N r a m a p r r a a ' c f s t o e i m c s e u t r h i a w t g i l l compvliyt lhm is reqnutthfeeumtelmte.ladlesecroiaprtpyiroont ccols determwhnitcchtgeusbte" emphtoyK'FMcNameamrsautrhetasct.taeresempty whetnhay raitvhWea n c o f u a v c e a r h l d c y u s t o a m r e e n s f o a r b m e t u h t e i r respon seimbpittloyitpterysit ot rfo f s l a i p r e e n t .

. KMPcNamara
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COMPE . ICAENRCIE_ I F I C . A . T E.

Instru R e f d n S s m p l E o c o R e q u a s E x t e n - s U i s o e m f i c s t m e p t o h r a t e q u i r e d a c t h a n o s e e t m a k E o m p l t e s e h e a c p e o c r o f o t m e a b a l n e d a a i c l o p o y f h f i c s t m o e W i l l i a m s a t h f e o l l o w i n W g a . s a h d i d D r g e t p s a s m : o f E e o t h o a g z y a , r W d a o s u a s e T d o x R e s u c P t r i o g n r a m , A t t e D e W o r l / P O B o s 7 7 0 5 y m W A a 9 8 5 0 4 A - n 7 7 t 7 e 5 r o s f h o e e n a d l t a r c h s i e v e c o m p l m i a n c e e q u e R t e d e e D a e W i l l i a (3 6 4 0 0) 7 - 6 3 y t 6 e q u e s t .

The problems identified below must be corrected in order to be in compliance with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Please indicate the date each action is completed and sign the concluding certification.

Compl i a R h r c e b & R e q u s i A e c t i o n	Compl i n D a t e D e a d l i C o m p l e t e d
1 W A C 1 7 3 - 3 0 3 - - F 0 a 7 i 0 l t (u 3 r e) e s i g w n a a s t t e e s . E c o l d g n m e s l A i c a t t L i e e h (t c e i r A u t g e 0 8 2 t 0 0 r 7 e) q u e s t e d d e s i g n a t f o o m c a n w i a c s m e a s a g e d - T s h i i t s e f . o r m u a s t o n n o w e p r o v w i d t e 7 d i a n o s f e c e f h p e s t t t o e n r c , a u w y a s t e m a n a g e d e s t w J e a m u 2 a 0 r 0 a y 6 n d A 2 0 0 U 5 n t f o r m a y t i o n i n c w a s p t r e o f l i a l b e o s r a a n t a o l e y s o d t s h p e r r t i m f e o r t m a t i o n . E c o l i o s g o y s i n t e r i e t h s h e e d l e s o i f g n n o a n t - i h o a m z a a s r h d o w u a s t e r " (g e n e b r y u a t s e h d t i o n t g a e r s a) n , " y n o n " ' . h e s a n d a d r e a s g s e " d - s i t e . W i t h 1 0 n d o a f y e s c e f p l t e s t p t r e o r v d i e d s e i g n a t i o n t h e f o l l w o a w s i s n t e g r e t a h m a s t n o e b s e o m e d i n S t e e p t e m 1 2 , 2 0 0 7 : a d h e v s a s p e e l y w m a e s r o i e e s i " d u u n e k , n v c a v s n t f e l ' b p r . a d s o r b e n t , P e p s a e n { P e p s s e b a v p a s (t m e i w e d d a u s s l i u c d) g , e m i n t s a e n k , w a s f t r e o m a u s t a i n v d a , s f t r e o m h e o m n (p m i w e d d a u s a t n i ' d s s) o , l i d , n o n - r e v g a r s t a e l e d	W i t h 1 0 d a y s W i t h 1 0 d a y s f o r m a t i o n f o r
2 W A C 1 7 3 - 3 0 8 a 1 4 t f o n r i e t i s g p a i t o l e r l e s l e a s e s . W i t h 1 0 n d o a f y e s c e f p l t e s t p t r e o r v i , i n d f e o r a n t a c h u i o t b w r p i w l e l r s e c l e a u n p a , d h d o w h e b y e p r l e v e i n t h f e u d t (u b r o e t n h s c i : d d t e u n t d s i t h w e a r e h o u s e) .	W i t h 1 0 d a y s
3 W A C 1 7 3 - 3 0 3 a - m l d 7 y 0 e (2 e) r 1 e 8 r 0 c F e t a) i : l t u p r r e o p p e r d p y a r e t h h e a z a r w d a o s u t s a e n i f e s t . W i t h 1 0 d a y s f h r e e c e f p l t e s t p t r e o r v E i c o b e l w o i g d y b c u m e n t a t i o n t h t a h m e a n i d f i e s s c t r e h p a l s e e c r p r r e A c l t s e o d t E i c f o y l o g y a n s b o u t o t h m e a m i f (e g s e n s e b r e a t t w e l a c e m u 1 a 2 , r 0 y 0 a 6 n A d u g u 3 s 1 2 , 0 0 t 7 h) a t m a k y a h e a d i s c r e p a n c i e s .	W i t h 1 0 d a y s
4 W A C 1 7 3 - 3 0 3 (b 2 a 0 (W A C 1 , 7 3 - - 3 6 0 3 (4 5) a) n (6) b y r e f e r F . a e i n l t u m r e e t t h d e a n g e w a s u t s e t a n r k e q s u t i o r r e a n g e e n t s . E c o l d g n m e s l A i c a t t L i e e h p t r e e r v i a c o l u d s r l e y s h s e e d e c a l n o o u f h e f l e o m E c o l o g d y i s a c l u s s b s e e a l c h o s o u f h r e e i n t s a e n a k n s d s t a i n l e a s l a s t t h S e e l p t e m 1 2 , 2 0 0 i 7 h s p e T h t f e o l n l . o w i n g	W i t h 1 0 d a y s

furdhe ericpstricovnided: • Wit h 4 dlayosf ece f pltestftiendiescho n t a m a n l a t i n g s y s t E m s o .loobgsye t h s a d m o e f h i s w a v s o r m k p d e t e S e p t e m 1 2 , 0 1 0 A n y e s i (d v u a v s a h g e e r n) e r b a y t d d e c o n t a m h i t e a a s t k i s n t g e u m s s t e p r o p a e c r c l u y m u a l n a d t t e d d e s i g a n s a e e q d i i W A e C 1 _ 7 3 - 3 0 3 - 0 7 0 . • Wi 3 0 d a y o s f e p e f p l t e s t a t n e d r c a l f e t a e r r a i c s h g s t e m e v a l e u a d t h e s k s t e m ? t e i h f r a z a e c d o o n u s s t w e n t e n r e l e t a s h e e h v i r o T h m i e s n a t . l . u m a u t s n i t o e h t h c e l o s u r e p e r f o r s m t a a m c o t e a r f d i s W A C 1 7 3 - 3 0 -P6 l 1 e 0 a (s 2 f) e . r t h a e t t a G u h i e d f r o C r l e e C a l r o : s o u D r a e n g e W r a o s u f f s a c i l i t i e s (P u b l # 9 4 t 1 0 m) .	Wit h 4 days Wit h 3 0 days	
• Wit 4 h 5 dlayosf ece f pltestptreorva,wd e t t e p t o E r c t o l o g y w h i i c n h c l a u d e e s s c r o i f p h t t e a c n k s t e c o n n ' s s t r (u e c t t h i e o n s i z e / d i o m f e h n e s i s o y n s d c e m f , i g p o i n p a a t n i o g p t , n h , e r i n t e p g a r o a t f s h t e a s k s t e m) . A t h s e o r q e f r s h o u e l i t d s e e v a l u i a n t c i l o r n e l , f i e n t g e a n c y l e s e p v e d b l s e n a s s c r a c k s g r e a t h e 0 n 0 1 - p i i n t c t h o , n p g e s b , b o l o i n h g e n r o m a i l n i h e e s c o n c r T e h t i e s . f o r w n i a b l t e l i s o e n d d e t e r i m f a z a e r d o u s c o n s t c b u h e a d V t e s e r n e l e t a s e o i d g l r o u n d w a t e r .	Wit h 4 5 days	
5 W A C 1 7 3 - 3 0 3 a n 1 2 7 0 0 (2 b) y r (e d f) e r E a i c t u p r e o v a i d e l a b t e h l a d e n t t h n f e a j e s i r s l a $ s p c w a t l a v e l a s i t n e h e c o n t a i n e r s . I m m e d i u p t r e e l c y e f p r t e s p b a t t e p t a e n d r u t n o s d e r t h r e i f s y k l m m e d i a t e l y (i t e x j c , e c t o d V . r i) d . 7 5 i c h a s y u s p n h o t o - d o c t . h u a n t e n t a t i o n c o n t a h i a n v e e r e s n r o p l e a r b l e y b l e e d t h i e n f n y e d r i i a s t k e .		
6 W A C 1 7 3 - 3 0 3 - a 2 r 0 e 0 3 (2 1 0) (r 2 e) f e r F e a n i c l t e u d r e e v e l o p a n d / o r a w f r o i l t l t o e v n i n s p e f o g r e i r o e f r a a c l i i h e s c p y e l c e t i o n s . W i t h i c a l 3 0 d a y s r , a l e f o c e l l a k v p w i t n t s p e s c c t h i e d r o u t e i n s p e a o n t b i n n i g t e o q r u i i n p g s n a e f n a e t n t e d y m e r g e e q u c i y p s n e e c n u t r , i d e v i a c n e d s p , e r a n h s i d h g u e q u i r p t r h e a r e t p p e v d e e n t t e , c t , r e s p t o b n a d z a t r o d h p e u b l i c o t h h e e a V t h o P n r m o e v n c t o d . e y a < ; > f t h i i n s s p e s c c t h i e d r E i c e l o g y .	W i t h 3 0 days	
7 W A C 1 7 3 - 3 0 3 - a 2 r 0 k D y (d f) e (e 3 e) n F c a e i t u p r e o v a i n d e a d e q u p a t r e s o t n m a e i l n r i o n g g r F a a m i . l u r e - a o r d p i r e p a r e w r i p t e e r s o t n m a e i l n i n g c o m p a l i a n r t a a i n m e i o n g r d s . W i t h 3 0 d a y o s f e c e f p l t e s t d t e e v r e a l d c a p n g e w r a o s u t t s r e a i n i n g p r o g w r h a i n s c h a i h b l a w d e t t a i p n l i a n n g l e c o p r e V A C 1 7 3 - 3 0 3 - 3 3 0 .	W i t h 3 0 days	
8 W A C 1 7 3 - 3 0 3 - a 2 r 0 k D y (d f) e (e - e 3 n 5 E 0 e : i t u p r r e p a a n r d e m a i n t a a i d n e q u C a o n t e i n R l e a n n g l m e r g p n o c y e d u r e s . W i t h 3 0 d a y o s f e c e f p l t e s t d t e e v r e a l w o r p i d d r e h i p g e a n d y e m e r g p e n o c c y e a l s r e e q s u i i W A e C 1 7 3 - 3 0 a 3 n - d 3 4 0 3 5 0 .	W i t h 3 0 days	

9 WAC 173-303-[illegible] Immediate Exceptions to Waste Disposal Ban Exceptions. Immediately [illegible]		

Kerry McNamara is the responsible [illegible] KPMcNamara [illegible] Vancouver [illegible] Washington [illegible] Department of Ecology [illegible] Mt. Kerry McNamara's certification [illegible].

I certify [illegible] under the direction [illegible] supervision [illegible] and [illegible] the information [illegible] to the [illegible] knowledge [illegible] complete.

Kerry McNamara, President
KPMcNamara

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 7705 Olympia, Washington 98504-7775 (360) 407-6300

May 19, 2008

CERTIFIED MAIL
7003 6450 0001 6954

Mr. Kevin McNamara
KPMcNamara
3972 Hamilton Avenue
Cleveland, OH 44114

RE: Dangerous Waste Inspection KPMcNamara - Vancouver, 2008 CRAD **WAH 000225556**

Dear Mr. McNamara:

The Department of Ecology conducted an inspection of KPMcNamara's Vancouver on May 7, 2008. Further information on Ecology's Hazardous Waste Inspection.

The purpose of this inspection was to determine the facility's compliance with the State Dangerous Waste Regulations (WAC 173-303). Ecology's variations summarized in the Compliance Report. The violations observed must be corrected within the time frame stated in the accompanied resulting in the issuance of the Hazardous Waste Act (RCW 70.105 and 080 and 095).

KPMcNamara - Vancouver was a generator of dangerous waste (Pacific Power Corporation) and the time of the inspection, was in fact in the process of the WAC 173-303-1 4e1 (u2i) Terminal Storage Facility. Ecology is a fine and violation of the penalties to act in the KPMcNamara's assessment on Pacific Power Corporation and the issuance of the WAC 173-303-1 4e1.

Please contact 360-407-6348 (deiwoh4a6v1e@yucey.twia.ngsov) about the correct quaicrteidamasl.sovaitlcaebwteytbouyour consultants.

P?J.at-_

Dean Rnams, Inspector
Hazardous Waste Toxics Reduction Program
Southwest Office

Enclosure: Compliance Report

cc: Douglas Vean, Wisconsin Water Resources Protection
(Douglas.Wisconsin@ac.us)
Brenton Greenkeeper, Wisconsin Water Resources Protection (abtriengtrj1@comcast.n
Erik Kinn Greenkeeper, Wisconsin Water Resources Protection (aetriingking113@comcast.n

FacNamey **KPMCNAMARA**	FacTypDeLQG	**PAGE of 2**
EPARCRAD#: **WAH0002556**	InspDatteon **05/07/08**	
SiContact: **TerraDuctechOpera(9531)7-3008**	InspName(s) **8eWi mlsSWRO-HWTR** **DouWgeisCsiWgtResouPrrcoetection**	
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Phottasken.(yceisrcle): .Samplneos:

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lask MerDu.tchwmhadyna ngewraosuwtsaens anagedamahhaofmewdsittlporoupbeaborealsing stated-aongleyraosWTE 02M.rDutchsmaahineh atsoPadc PowVearchahwea snteeedos bede f itrheids way, bpurtovtpihadepeyelorHoatvheatHtes.tahiejussitgtnhse blialdlisngo.f

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W e c o n c l o u d r e s p e c t t h e t o f h s e i t L e a , t i e h n d e a y w , a s o n t a o y E t r e K d i n o G r e e k s i d e E n v i r o n S n h e s n a t C a d l e . e k h s a b l e e c r o n t a o y K t R d _ N a t m e a d r a r e s p s r o a n t y a m a s y h a v e i a r t s e n W h e s p i s c t w s a s s e t d e w a t e r a n s c l o i n p l m e f h i f e l s o o r l d f r e e c e t s e n d e - m t a M r M c N a m t a e r c a d r t e h s e s s s e u e s .

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T A B L A E W A S T S E U M M A R Y

Waste/Product Observed	Amount	Location	Management
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3. P y m l e (n o n) D W	O n e 2 5 g 0 T - o t e		l a b e a h e l d o s e d .
4. P y r o l e (n o n) D W	O n e 2 5 g 0 T - o t e	"	L a b e a h e l d o s e d .
5. C h r o (m e o D W)	O n 2 5 0 T - o g t e	"	l a b e a h e l d o s e d .
6 W a s t e w a t e T w 2 5 0 g a l p l o o l n y t a n k s .		D a n g e W a c s u T s a n l k a s b a s l a d g e w a c S l s s p i l o a c c u m o W a s i t n e s h i a d h e k r m	

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Washi Sct tDtep a r t o fE c o l H b a g z y a r W l a o s u & s e T x i R c e s d u c P t r i o o g n r a m
Inte Ardrdertestp://www.ecv.wa.gov

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Inspectors: DeWilli SaWhrsO,- HWTR oo·Wuegis Vsanco Water RePsrcoutreccetion	SiPtheo#n:e 36,0-695-2450
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NOTICE COMPLY	PAGE
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Washington State Department of Ecology Hazardous Waste & Toxics Reduction Program

CHECKLIST SUMMARY OF VIOLATIONS FOR GENERATORS OF HAZARDOUS WASTE (Page 1 of 2)

EPA RCRA #:	Facility ID #:	Facility Name:	Inspection Date:
WAH 000 025 256		KP McNAMARA	05/07/08

Dangerous Waste

Inspectors:
DeWill Smith, HWTR
Douwe Wiersma, Compliance Program

Instructions:
1. Violations must be corrected and explained to Ecology.
2. Documentation of violations must be received within 30 days, through Certificate.

Facility status is as follows:
V=Violation NA=Not Applicable PV=Previous Violation (from previous inspection)

	WAC Code	Conditions Requirements	Facility Status		
ESQG	173-303-070(8)	Quantity of dangerous waste generated and accumulated	D	D	D
	070(7)	All records must be kept for three years.	D	D	D
	070(8)(b)	Storage of dangerous waste designated.	D	D	D
	070(8)(b)	Storage of dangerous waste in containers.	D	D	D
	060(5)	Notify EPA of hazardous waste activity.	D	D	D
		MQG and SQG Requirements (more stringent than ESQG requirements)			
MQG	060(1)	Obtain EPA ID number (apply online at www.ecy.wa.gov)	O	D	D
	060(2)	Revise EPA ID number if address changes	D	D	D
	060(5)	Annual report submitted to Ecology	D	D	D
	210(2)	Copy of Annual Report available for review	D	D	D
	210(3)	Waste designation records	D	D	D
	180(1)	Manifest requirements	D	D	D
	210(1)	Signature of manifest	D	D	D
	220(2)	Exceptions within 45 days	D	D	D
	140(2)	Recordkeeping requirements	D	D	D
	070(7)	Retention of records	D	D	D
	170(3)	Treatment in accumulation tanks	D	D	D
	300(5)	Requirements for land disposal	D	D	D
Washington	170(1)	Waste storage permit	D	D	D
	070(4)	Waste storage designation	D	D	D
	070(6)	Approval of waste storage	D	D	D
	142	State-wide hazardous waste authority	D	D	D
	630(5)(a)	Contained in containers	D	D	D
	200(1)	Dangerous waste in containers	D	D	D
	630(3)	Contained in containers	D	D	D
	630(5)(a)	Contained in containers	D	D	D
	630(7)	Contained in containers	D	D	D
	032(3)	Solid waste management	D	D	D
	630(6)	Accumulation	D	D	D
	200(2)(a)	State Accumulation	D	D	D
	200(2)	Accumulation	D	D	D
	630(8)(b)	Contained in containers	D	D	D
	200(1)	Contained in containers	D	D	D
	630(4)	Contained in containers	D	D	D
	630(9)	Incompatible waste	D	D	D
	630(5)(c)	Minimum separation		D	D
	200(2)(a)	Disposal of accumulation		D	D
	016(5)(d)	Accumulation	D	D	D
	505(2)(d)	Discharge prohibited	D	D	D
	802	Comply with other requirements	D	D	D

EPA ID: WAD 000225556	Facility Name: KPMc NAMARA	Inspection Date: 05/07/08	(Page 3)

Facility Status Legend: V = Violation NA = Not Applicable PV = Previous Violation

	WAC Code 173-303	MQG and Requirements	Facility Status V	NA	PV
Operating Record	-340(2)	Communication of emergency information to local authorities	D	D	D
	-340(1)	Emergency equipment provided/maintained	D	D	D
	-201(2)	Posting of emergency information	D	D	D
	-201(2)	Designated emergency coordinator available	D	D	D
	-320(1)	General inspection requirements	D	D	D
	-320(2)	General inspection schedule	D	D	O
	-320(2)	General inspection records	D	D	O
	-320(2)	Tank inspection records	D	D	O
	-320(2)	Tank inspection schedule	D	D	D
	-340(4)	Arrangements with local authorities documented	D	O	D
Operating Record	-515	Required documentation for emergency overweight	D	D	D
	-515(4)	Use of manifest system for shipments of dangerous waste	D	D	D
	-515(5)	Use of manifest system for receiving dangerous waste	D	D	D
	-515(6)	Contingency plan (40 CFR 279.22(c))	D	D	D
	-515(6)	Discharge of waste (40 CFR 279.22(d))	D	D	D
	-515(6)	Contingency plan amendments	D	O	D
	-515(6)(b)	Use of manifest system for shipments of short-term storage and transportation	D	D	D
	-522(2)	Anti-freeze containing ethylene glycol	D	O	D
Operating Record	-120	Recycling/reuse/reclamation/beneficial use	D	D	D
	525(1)	Regulated hazardous waste storage	D	D	D
	-505(2)	Recycling/reuse/reclamation/beneficial use	D	D	D
	505(2)	Applicable Dangerous Waste storage	D	D	D
	525(1)	Recycling/reuse/reclamation requirements of -180	D	D	D
	-145(2)	Aspects of the environmental protection immediately	D	D	D
	-145(3)	Aspects of the closure activities controlled	D	D	a
Operating Record	SQHUW: <11 KUWs & <2.2 KI Lamps	-573(1)(a) Management of hazardous waste in the environment	D	D	D
		-573(1)(a) Spill or release of hazardous waste to the environment	D	O	D
		-573(1)(a) Accumulation of hazardous waste documented	D	D	O
	LQHUW: >11 KUWs or >2.2 KI Lamps	-573(1)(a) Management of hazardous waste in the environment	O	D	D
		-573(1)(a) Spill or release of hazardous waste to the environment	D	D	D
Operating Record	-640(6)	Daily inspection of equipment		D	D
	-640(5)	Tank inspection	D	D	D
	-640(4)	Secondary containment	D	D	[ ]

Facility Log Book (general information) Yes! Facility Log Book Checklist

Notes:

Washington Department of Ecology Hazardous Waste & Toxic Reduction Program

CHECKLIST SUMMARY OF VIOLATIONS FOR LQG GENERATORS OF HAZARDOUS WASTE (Page 3 of 3)

EPA RCRA #:	Facility Site ID#:	Facility Name:	Inspection Date:
WAH 000 025 256		KP McNAMARA	05/07/08

LQG Generator Dangerous Waste

Inspectors:
Dewill Sams, HWTR
Douglas Vancouver Water Resource Protection

Instructions:
1. Violations of the cited rules shall be cited as Notice to Comply.
3. Document that the violation has been corrected by Ecology Hazardous Waste Compliance Certificate.

Facility status is evaluated for each item on this Checklist as follows:
V=Violation NA=Not Applicable PV=Previous Violation (from a previous inspection)

WAC Code		LQG Requirements (Generates more than 1,000kg/2,200 lbs/270 gallons per month of HW)	Facility Status V	NA	PV
[illegible]	-170(3)	Accumulation of waste for 90 days. [ref by -200(1)(e)]	D	D	D
[illegible]	-330	The training requirement (ttsr apirnoigrwgamp, tamaire rcrogrbs) [ref by -200(1)(e)]	D	D	D
[illegible]	-330(1)	A program of classroom or on-the-job training provided. [ref by -200(1)(e)]	D	D	D
[illegible]	-330(2)	A DW training plan was adequate and available. [ref by -200(1)(e)] Was the plan thoroughly reviewed as part of this inspection? Yes ☐ No ☒	D	D	D
[illegible]	-330(2)	A written contingency plan was prepared in [ref by -200(1)(e)]	D	D	D
[illegible]	-330(3)	Personnel training was adequate in [ref by -200(1)(e)]	D	D	D
[illegible]	-350(2)	A contingency plan was prepared [ref by -200(1)(e)]	D	D	D
[illegible]	-350(3)	Contingency plan was adequate, taking advice [ref by -200(1)(e)] as the plan thoroughly reviewed in this inspection? Yes ☐ No ☒	D	D	D

Notes:
The training plan and contingency plan were reviewed during inspection.

Washington State Department of Ecology Hazardous Waste & Toxics Reduction - Pr
\ I I A S T A N E G T O N
O N E I C O L O & V
Address: http://www.ecy.wa.gov

Southwest Regional Office	Northwest Regional Office	East Regional Office	Central Regional Office
PO Box 47775	3190 - 160 SE	4601 N Monroe	15 West Yakima Ave. Ste 200
Olympia, WA 98504-7775	Bellevue, WA 98008-5452	Spokane, WA 99205	Yakima, WA 98902-3452
Phone (360) 407-6300	Phone (425) 649-7000	Phone (509) 329-3400	Phone (509) 575-2490
FAX (360) 407-6305	FAX (425) 649-7098	FAX (509) 329-3529	FAX (509) 575-2809

COMPLIANCE CERTIFICATE

This document must be returned to Ecology 30 days after receipt of compliance with the Notice of Compliance, and include proof of compliance (photos, manifests/documents, or other proof of compliance, whichever is appropriate).
You may request extensions to the Notice of Compliance requirements in the Notice of Compliance, and to the Notice of Compliance requirements in the Notice of Compliance requirements.

Compliance Certification

1. I certify that the violation to the Notice of Compliance is complete and has been corrected.
2. I have personally reviewed the documentation and the proof of compliance to the Notice of Compliance and to the Notice of Compliance requirements.
3. I am a watershed manager in the Notice of Compliance and to the Notice of Compliance requirements.
4. I declare under the penalty of the Notice of Compliance and to the Notice of Compliance requirements.

Signature:	Print Name:
Position/Title:	Date:

SUMMARY of Focus Area Violations

Violation Code	Check Photo	Check Evidence Paper	Submitted Statement	Comments
-142	D	0	0	
-630(6)	0	0	0	
-640(6)	0	0	D	

RECEIVED
JAN 2008
Washington State Department of Ecology

K.P. McNamara - Vancouver
Pollution Prevention Practices

J. Bell [illegible] Standards Waste Regulations, [illegible] K.P. McNamara - Vancouver facility.

WAC 172-.3 Waste Designation

1111 Given the variation of waste [illegible] K.P. McNamara [illegible] designation [illegible] 2500 [illegible]

iiii Prior to [illegible] K.P. McNamara [illegible] waste [illegible] litter contamination [illegible] will not be added to [illegible]

iii All designations [illegible] required [illegible] WAC 173-30 [illegible] (Ledge)

WAC 173-30 Spill Cleanup

1111 Spill [illegible] WAC 173-33-145

[illegible] Cleanup [illegible] accumulated subsequent [illegible] proposal

Spill [illegible] accumulated [illegible]

WAC 17.3-.3 Stack Standards

e Rinsate [illegible] 2500 [illegible] water [illegible] 1 [illegible] WAC 173-30 [illegible] WAC 173-30 [illegible] 640 [illegible]

; \ ¥ AC 173 N-o n3-0p3e-C8p5e0r{ta2(t)d Eo m pT o y tAecsc e p t e d)

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m KPMcNamwainlaoatcctecp(teostt hceomtatihnaetbsepdestiicides acuthazyawdasoutsoxeikdrbamazayvdasUUNsL E S Sceontainers i"emp(tiyi'heabsee in irpihasseedquiiWrAeCd. 3-303-160).

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12-28-07

Kerry McNamara, President Date
KP McNamara

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[1] Thisscshuedrebifcuindgeilsn,isdeecsb,iocaindlde0sd,e 1.1Tthiteco,itveesl usualenlayrkaead "pcoitshMeant"eS1aifaDelatSyaeneaty detshperridbuect iaspesthieridéqingiencsiedebtiiocciddeee,netticide,