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.

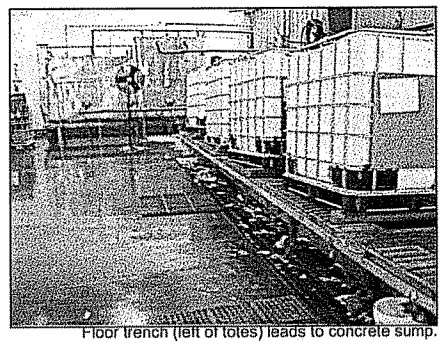
KP cleans, restores and deconstructs 275- to 330-gallon totes. These totes are supposed to arrive 'empty' (as defined in WAC 173-303-040), but may contain a small amount of residual material such as phenol-formaldehyde resins, paints, biocides, and water treatment chemicals. Product residuals are accumulated 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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- KP setahbeeonctreeaerdlimitnhaetumpTheaylsestablished newontfroarcsepttoitanegsdanagwiansgtTehsecyommunicated thecommitmeiaPsolaincDreasctdiocceusm'seingtoyKderry McNama(atrhaenenDecem2o8e2,00A7.coopfyhdioscumiesnt inclausAtdachment 2

FINDINGSthroSuegphte2008

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OnJu 3 y 2 0 0 E8 c, o l o o g n y t a K o P t ' e s o d n s u (l C t r a e n e t E k s v i d e o n t m c e n t a l)
d i s c c u o s m s p l i a s n s c l d e t s h a d n v e r E a l o l l o e g a y r t n h e a d t i s f h t h p r o e f n t
t o x d i a c n g e w a o s u t s e b e h e a s r e d n t P P V J u n e 2 T 0 h 0 s 8 h . i p m t e o p k a c e
<u>a f</u> t K e P w a d i r e t c o t e a d s h e i p m u e m t t h s h e y t h W e A C 1 7 3 - 3 0 3 - 1 4 1
r e q u i r e m e n t s .

K P s u b s e q s u e b n m t l i y n t f e o d r m t h e s h o t o w n h e y a d e q u a d l e r f y e t s h s e d
v i o l a o t b i s o e m r i s M l e a d y 2 0 0 A 8 n d n A u g u 2 s 7 2 , 0 0 E8 c , o l f o c g r y w a a r l d e e t t d t o e r
K P f o r m a l l y a c t k h n r e o c e w t l u e e r d o g n m p n l g i a n c e

<u>F I N D I - N O G c S t o b e</u> r 2 0 0 8

O n O c t o 2 b 2 e 0 r 0 E8 c , o l w o a g s y o n t a b c y t t h e C d i d t y V a n c o a u b v e K r P t ' s
m a n a g e m o n f e n e t c u r y - o w o a n s t t O a e n O r c i t m o 8 b 2 e 0 r 0 E8 c , o l o o c g n y d u a c n t e d
u n a n n o u i m n c s e p d e a c K t P i t o n f o b h t o h W e - i u t q y o ' n s c e a n r t d s d E 1 K t P e ' r s m i n e
r o u t i n e o w o i m t p h s e t f a n c e ė s w d a s n r g t e e g r u o l u a s t i o n s .

S e v e r r e a p l v e a ö l a w t e i r o o e d n s s e d w u e r d n
t h i e n s p e **A t p i p o e n r 4 p d r i o x** v a i c d o e p s y f .
t h l e n s p e R c e t p i a o m n N l o t o i V ė o l a t i o n
p r e p a f r o e d d o w i e m s g p e c t i o n .

T o t e s s t a t e t - o x c h i a l o n y g e w r a o s u t s e .

K P h a a d l c c u m u o l v a e S t e d t o r t e s a g h l y
2 1 0 , 0 0 0 - o p f o o u x h i a l o d s g e w a o s u t s e .
T a t w e e s m e o p t r o p l e a r b l e y a l n e w d l e r s e t o r e d
i a w a y t h a e t s t r a i c c t e t e s o d / f f i o r r e
e q u i p o m n e e p n d t o l n t T r o t w e e s r a e l s o
s t o w e ė d l h p o r u o t p s e c o n d c a n r t y a i n m e n t ,
a n s d l e v e t r o a t w l e e s m h e e b o d - s f i o o r v e 9 0 -
d a y s .

D u r i t n h O g e c t o 8 b 2 e 0 r 0 i 8 n s p e E c t o i b o n g y
a l s o b s e r s v e e v d e t r o a t s l e i s t c t u i n s g t i h d e e
b u i l d T h i n e g s e t c e o s n t a v i a n r e y d i n g a m o u n t s
o f i g n i t a b l e h , a z e a x r t a d r o e s u n t s e a l t y e - o n
t o x d i a c n g e w a o s u T s h e e w y e r s e t o w ė d h o u t
c l e i a d r e n t i o f f t i c o c r a t t e a i m o w h s i t h o u t
s e c o n d c a n r t y a i (n t m h e e e a y n s e i t a t b i o n a g e
p e r m e g a b a d l e e e i v e K W P a y o s p e r a t i o n
m a n a g c e u n l o d e t x p l t a h o e n i c g f i h m e a s t
a n d c o u n l o d e t s t a b w h h ė t s a h h e w a a r s r t i a e v t e
K P .

Tote at KP. Labels indicate toxic dangerous waste.

O n O c t o 1 b 6 e 2 , r 0 0 E8 c , o l f o c g r y w a K r P a l e e d t a t n e N d r o t o i V ė o l a O t n O c o t n o b e r
1 7 2 , 0 0 E8 c , o l o o c g n y d u a c f t o e l d l o i w n s p p e a c t t i s t o i h n t A e t . h a i t m E e c , o l o g y
o b s e r s v e e v d e m r o a r l e d t o o r n t e a s d i a n n i g n e g w a o s u t s e l o o r e d s w i i d t e h o u t
s e c o n d c a n r t y a i n h m e n s p d c t r o s e t c h b e s s e e r v a n O i c o t m r o 2 b 0 e 2 , r 0 0 8 ,
E c o l f o c g r y w a a r n d l r e a n d e d A i c a t t l e e n t t K e P (s **A p p e n 5 d)** T i h x i l s e t t e r
d i r e t c h t o e s o d h p a t n o c y e a a s e e c e p n t o i n n - g e t m n o p t t a e y n s t d , a d d r c e o s n s c e r n s
a b o t u h t t e o t a e l s r e o a n d - y s i t e .

The most serious violations found were as follows:

- **WAC 173-303-141(2): Failure to use appropriate procedures when sending designated dangerous waste off-site.** KP inappropriately shipped its state-only dangerous waste (rinse-water tars) when shipments of dangerous waste manifested was transported with no EPA/State Transporter Identification Number to a facility that is not permitted to accept dangerous waste.

- **WAC 173-303-200(1): Improper accumulation of dangerous waste in containers.** KP accumulated dangerous waste in drums, totes, and tanks that were not properly labeled, were not properly closed or inspected, were not in good condition, and were managed without adequate spacing or secondary containment.

- **WAC 173-303-280(1)(a): Failure to obtain a permit and meet the standards for operating a dangerous waste treatment, storage, and disposal (TSD) facility.** KP accepted dangerous waste from off-site generators. The waste accepted was not exempt from WAC 173-303-160 and contains significant amounts of extremely hazardous, toxic dangerous waste. KP stored this dangerous waste improperly, lacking security, containment, or controls.

<u>DISCUSS</u>ION:

This Request for Enforcement focuses on KP's mismanagement of rinse-water (state-only dangerous waste) and tars (extremely hazardous waste), involving violations of WAC 173-303. These violations represent a significant threat to human health and the environment. Table A, attached, provides a summary of violations at KP.

Other Considerations:

A. No concerns have been raised by the staff of Ecology.

B. Economic impact: KP's cost to ship dangerous waste to a Treatment, Storage, and Disposal (TSD) facility was about $3.00/gallon. PTW was about $0.50/kg. KP also saved roughly $50,000 by not managing their PTW through a TSD.

KP also saved money by not having 90-day shipments, roughly $1,350 each. By holding wastes, KP avoided costs.

C. Ecology is not aware of any sensitivities (sensitive issues, users, stakeholders or concerned interests).

D. Workload implications: the potential that the facility will appeal the penalty, which could result in additional workload for the Ecology program and/or Attorney General staff.

E. Ecology consulted with the Vancouver Regional Office Pretreatment Program, Clark County Health Department, and Department of Labor and Industries. These three agencies are working independently, coordinating information and risks.

F. There are no allegations requiring investigation.

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 m 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 m 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 d l e a S i g n i N i o r 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 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 E P d i s n a p p r o d p s p e a s t a t e - o n l y d a n g e w a s s a 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 g w a s 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 v 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 E n o 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 e 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
WAC173-303-F1a4i1lt(u2rs)ee approprioacteedaunmeest hwthsen sendaisntgated-eosnilgymaanhegderous wastemout-off-asctialtiety.	Major	$6,000	$10,000	$10,000
WAC173-303a-2 8 0 F O a : i l t u r b e t a i M a j o r aperrmitmeetthreequirefrmentsoperaatdiamggewastseeatment, storaamgdeispo(TSD)facility.	Major	$6,000	$10,000	$10,000"
TOTAL		$6,000	$10,000	$20,000

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 v 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 O n p t i 3 o i s a l c u l t y 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 i l e n 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 e 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
V i o l a t i o n		
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

Human Health and Environment	with the proper shipping paperwork or placarding. The transporter told EPA that the dust was a state dangerous waste. There was no indication that the hauler was certified to transport hazardous materials or dangerous waste. KP had not established that the receiving facility (PPV) could accept the waste. While KP later determined that PPV could accept the waste, they put human health and the environment at risk by managing the waste through PPV. Without proper assurance the facility could accept or treat the waste. KP accepted the hazardous waste and toxic dangerous waste onsite. This waste was stored on a bare gravel driveway (no cover or roof in place, and no secondary containment). There was no record of proper labeling. KP is an industrial site at the bank of the Columbia River and groundwater sampling. After KP determined that in-ground sumps leak. The analysis showed high groundwater penetration (the groundwater is a very few feet below the surface; spill could reach quickly the shallow-source groundwater)	is warranted, based on consideration of this factor discretion.
History of Compliance	Numerous inspections have been conducted at KP and repeat violations have been cited. KP has been considered for enforcement in the past. KP has a history of being the subject of enforcement (over $100,000 penalty) for their mismanagement of dangerous waste. The Water Resources Protection Program, Department of Labor and Industries, and the Department have expressed concerns to KP about its operation and have worked with the company to address problems. Historically, KP has responded slowly to Ecology's concerns. Simultaneously, the company has demonstrated	While KP has demonstrated a willingness to work with Ecology, the company did not take corrective action until after directed. No reduction in penalty is recommended.

	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 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 e l d o 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 n g e w a o s u t s f e t v e t s a e l n t) P P V a , n 2 d . b) . o t h s t a t n h c a e t s E c o l 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 t l a e e d n u m e r r o e u p s e a i c 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 h a t r e S t r e p t e 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 D 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 h 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 fluff was adequately designated for off-site disposal.	August 2007
WAC 173-303-145 Failure to report spills and releases. Spills were observed on pipes, valves, in the areas near the tanks. Residue was also observed on valves to tanks outside.	August 2007 October 2008
WAC 173-303-180(1) (refer to 40 CFR 262.20(a)) Failure to properly prepare the hazardous waste manifest. Manifest #001692 1569 did not include transporter's phone number, EPA identification number.	August 2007
WAC 173-303-200(1)(b) (WAC 173-303-640(4)(b)(i)), refer to Failure to meet the dangerous waste tank storage requirements. KP was accumulating waste in in-ground units, two "rinse tanks", stainless steel tanks -- with no tank system assessment, adequate secondary containment, integrity, adequate controls to prevent releases, and were not properly protected to prevent release to the environment.	August 2007 May 2008
WAC 173-303-200(1)(e) and 173-303-330 Failure to provide adequate personnel training; Failure to prepare and maintain a written personnel training plan, and maintain training records. Operators could not tell the difference between dangerous and non-dangerous wastes and were not aware of the risks associated with the management of their waste. They were not concerned about spills, fluff on the floor, or about accumulating high-pH liquid in the floor sumps and trenches. Everybody working there did not seem to understand or adequately the Dangerous Waste Regulations.	August 2007
WAC 173-303-200(1)(d) (by reference 173-303-350) Failure to prepare and maintain adequate Contingency Plan and emergency procedures. A Contingency Plan was prepared by an Oil Recovery contractor but did not demonstrate full understanding of the facility's processes.	August 2007
WAC 173-303-141(2) Failure to use appropriate procedures and methods to ensure designated dangerous waste is sent to an out-of-state facility. KP disposed of its out-of-state oxidizing waste (rinse-water) through Pacific Power Vac (PPV) of Portland, Oregon.	May 2008
WAC 173-303-200(1)(b) and 173-303-320(2)(c) Failure to conduct weekly inspections of dangerous waste accumulation areas and containers. KP skipped at least two weeks of inspections.	May 2008
WAC 173-303-170(2) (refer to 200(1)(c)) Failure to label containers "Hazardous Waste" or "Dangerous Waste" and/or failure to provide labels that identify the major risk. Totes and drums were not marked as dangerous waste or the risk.	August 2007 October 2008

WAC173-303-200(1)(b)(iii) Failure to conduct general inspections. The owner/operator failed to conduct general inspections of the hazardous waste storage area. Based on the observations of the inspector, the storage area was observed to be in violation of the requirements of WAC 173-303-200(1)(b)(iii).	August 2007 October 2008
WAC173-303-200(1)(b)(iv) Failure to keep the required inspection records. Failure to keep the required inspection records. KPA accepted the facility's comments that the storage area was observed to be "empty" as defined in WAC 173-303-160(2), and was not a dangerous waste treatment, storage, or disposal facility. NOTE: August 2007 October 2008 Ecology issued a notice of violation WAC 173-303-200(1)(b)(iii) because the storage area was observed to be a dangerous waste treatment, storage, or disposal facility.	August 2007 October 2008
WAC173-303-200(1)(b)(vi) Failure to maintain at the minimum the following information: contingency plan, emergency procedures and equipment inventory. The owner/operator failed to keep a copy of the contingency plan, emergency procedures and equipment inventory at the facility. Based on the observations of the inspector, the storage area was observed to be in violation of the requirements of WAC 173-303-200(1)(b)(vi).	October 2008
WAC173-303-200(1)(b)(vii) Failure to maintain at the minimum the following information: a log of all inspections. The owner/operator failed to keep a log of all inspections.	October 2008
WAC173-303-200(1)(b)(viii) Failure to provide adequate secondary containment. Over 30 gallons of liquid was observed in the secondary containment system. Based on the observations of the inspector, the storage area was observed to be in violation of the requirements of WAC 173-303-200(1)(b)(viii).	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 Order 6237 requiring a detailed compliance with the Dangerous Waste Regulation (WAC 73-303), addressing the human health environment. Also enclosed Notice 6229 is being for a situation of pgraocpceumlayn date disposal as negewraosutsenerontesdinfdai, tlmienetgthgeenerequirfeomrents dangewraosutsreeatsmeonatandesp(oTsSaOa)cilities.

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Sincerely,

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KSeiSlectMiaonnager
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Enclosures

cc: PenaDletsyKi, sOcfaflice
DouWgisVea,ncoWuaveRerersouPrcoetePcrtoigornam
(douglas.wise@ci.vancouver.wa.us)

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

To: Mr Kerry McNamara, as a sole owner and personally
397 Hamilton Avenue
Cleveland, OH 44114

For the site located at:
503 E Mariah Avenue
Vancouver, WA 98661
RCRA #WAH000010603

This is an Administrative Order requiring Kerry McNamara and KPM McNamara (collective referred to as Kerry) to comply with Hazardous Management Act (Chapter 70 RCW) and the State Dangerous Waste Regulation (Chapter 173-303 WAC) by taking the actions described below. Chapter 70 RCW has authorized Department of Ecology (Ecology) to issue Administrative Orders requiring compliance with the terms of the Hazardous Waste Regulation Act (Chapter 70 RCW).

The Department has determined that KPM managed hazardous waste in a manner that presents a significant risk to human health and the environment. The Department has also determined that KPM is in a substantial violation of the Kerry's including following:

- **WAC 173-303-141 (2) Failure to prepare an appropriate and adequate methods when engaged in a single-or-only dangerous waste on out-of-state facility.** KPM is approximately 1 ton of dangerous waste in a single-wide trailer, which is a dangerous waste on the site without having a dangerous waste in a fixed state by a transporter to the EPA/ST treatment plant in Nuimcbaetrwd, on the country in the attic of the receiving pipe by mixing the dangerous waste.

- **WAC 173-303-200 (2) Failure to prepare accumulating waste in containers.** KPM accumulating waste in drums, tanks and tanks were not properly well not properly, or not in a dangerous waste in a second or third tank.

- **173-303-240 (2) Failure to prepare a permit to meet the requirements of a dangerous waste at the onto a dangerous disposal facility.** KPM is accepted for the following sites. These sites are not

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Givtehaebofviendaimdgasci,cnorwaiRCW70.105itsr95e,trheKdPt
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mustemadaevaiflarbelveipeorrequifeasctcorwaiWAC173-30;3-210.

2. WAC17-3303-1-4D1i(s2p)ossitatgeDangyWausste

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3. WAC173-303-S45anBischatrdgheesenvironment

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**4. WAC173-303a-1170(e2f)er2e0n0(e1)angeWausMeanagement
inContainers**

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- WAC173-303a-d1170e(f2e)r-2n0e(-1A)c(cu)mdaagerous
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empetcontainers.

- 1 7 3 - 3 0 3a-rlb7yr0e(f2e) r- e2 r0 0 e(-A-c) (c u m) ud laa ntgeewr ao suitsre c o n atihmaermea 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 d 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(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 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 b 3 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 -) -A 6 n 4 y 0 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 - 6 D 4 a 0 n (g 5 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 w r a p s o 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 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 (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 p h 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 m a e f h a e n t e y m e r g e e n c u c i y p s n e c u d r e i v t i y c e s a n o d p e r a t i o n e / q s u t i p u n c h n e u p r t p h e l a v d 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
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P a g4eo 6

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a c c u m u a l raetai so .n

M a i natlaoogfh hien s p e cta d c o o n s w a i n T 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 i 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 i 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 h 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 e 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 n s 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 n 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 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 h u a v a e i g l a p p e l a C l r s d T e o a p p e l a y l o s m u s t :

- F i y l o 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 s w i t h 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 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 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 g s 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 d 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 a t l h D e e p a r t m E e c n o t l 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 f i a 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 g W e b s i t e :
h t t p : e / h / o w a g . 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 s h i W 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

You appeal will not be effective to the Ordinary Stay requests to submit a cover or waiver RCW 43.218.320

DATED 3 day of _____ 2008 at Olympia, Washington

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 KMP Mc Namara	)))	NOTICE OF PENALTY INCURRED AND DUE No. DE 6229

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

Fotrhseilt oec a tte d
503 SE Mari Ave #5
Vanco WA 98661
RCRA # WA0 H0010603

Notiscievtehnatdeepartofienet (oDleopgayrhtmaesnste)sapendalty agaiyrosuthaemouonfst20,f0o0r0olaCthiaopm7t0eorfRCWa5thseie. knowsKPMcNamaroaat5e03SEMariAvie#5V,ancoWuAv9e8r661.

ThpeenailstayoendhfeollDewpagfmendtngs:

- **WAC173-303-F1a4i1(u2rsae:ptporopprrioacteedaundesthods whesnendaisntgated-eosnilgydangewaosutseout-of-state faciKIPintyapprodpirsipaotseeskyeipmoesnttastetooxnilcy dangewraosu(tsreinsel-waclaestehseh ipmaesent-off-site withadangewraosuntsaenifewhtasubyadransvpiotrhaeurt EPA/STtraatnesplodenteirNfuimcbaetnwdointhcountfirtmhaltieon recefaciwlagsiptyrmtiatctcedpangewraosutse.**

11 **173-30a3n-d2480f00a:ilu-roebtapaeinnoitcompWliythe requirefmoerpnetrsaatdiamgewaosutseeatsmteonrtaangde dispo(TSSDa)ciKPatcyc.epoteefsromg9enfe-rsaitteers.** totweesmeot"emplyeyliWAC173.303-160(d2n)t,ained ignifamiocuanntgsnieaxbrhnaezlayradnotduosdiangewraosutse. KPoperasaeuchpernidangewraosuttsreeatsmteonratangde dispfoascawlheiratycepthteodtceosntadiannign.gEa;sftfOLis

Thpeenailstuyanplayabbyleewithhin(r3tdya)yosfyourecefptts Notice.

Pleasentchpeaymeot
Departmentofecology
Cashi Uenriitng
PO Box 47611
Olym WpAi9a8504-7611

You have the right to submit an Application for Reduction of Ecology. You have the right to appeal. Appeals are not to be presented to the Pollution Control Board. Instead, they are to be exercised in the Appellate Court of Ecology.

If you fail to timely Apply for Reduction of Ecology within 30 days of your receipt of this notice, the Ecology will be prepared to "Notice of Disposition" on Application for Reduction of Ecology. Your Appellate Court of Ecology will be the Dispositional Appellate Court of Ecology. Pollution Control Board Hearings

NOTICE: If you do not submit an Apply for Reduction of Ecology, the Appellate Court will be considered a new Appellate Court of Ecology, and will be subject to a trial de novo in the Appellate Court of Ecology.

To submit an Application for Reduction of Ecology: See Section 43.B2.1 RCW. You are to submit an Application for Reduction of Ecology to the Department of Ecology within 30 days of the date of the Appellate Court of Ecology.

To apply for relief you must:

May do Apply for Reduction of Ecology		Deliver your Application for Reduction of Ecology in person
The Department of Ecology Appellate Court of Ecology Coordinator PO Box 47608 Olympia, WA 98504-7608	**OR**	The Department of Ecology Appellate Court of Ecology Coordinator 300 Desmond Dr SE Lacey, WA 98503

To Appeal the Notice of Penalty Amount:

- If you are appealing the Pollution Control Board, you will have 30 days of the "<" of the Appellate Court of Ecology. Failure to do so may be a strong reason for the Board during a full hearing.
- Serve your appeal to the Department of Ecology within 30 days of the date of receipt of this Notice. Serve a copy of the proceedings in WAC 371-08-305 (free) and affirmative RCW 43.B2.10(021).

Be sure to do the following:

- Include a copy of the Notice of Penalty that you are appealing in the Notice of Appeal.
- Serve a copy of your appeal to the Department of Ecology.

1 To fyiouappewaitthPeolluCtoinothreaIriBrogasrd

Maaippetal:

ThePollCointhreaIriBrogasrd
POBox40903
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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. Nesmaa) are dealers of marsh elcye) issued "NOTICE OF PENALTY INCURRED AND DUE", which is that the KPMcNamara and Kerry McNamara have an outstanding penalty of $20,000.

I have further read under RCW 9A.72.030 which is included with this document which prescribes a fact of the risk of false statement here by making, declaration on behalf of KPMcNamara and Kerry McNamara in application mitigation or remission of the penalty of the following reasons:

KPMcNamara
Decem3b2e0r08
Pag5e05

Is we a hrtahtfeo r e g s ti n u g e a, lnkdomp s e t a e e m f e n f e a c t o s h c i a s s e .

By _

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[1917s5tx c2s6 s0e9A.72.030]

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47700 • Olympia, Washington 98504-7700 • (360) 407-6300

August 21, 2007

CERTIFIED MAIL
7007 1000 0422 5063 77

Mr. Jeff Hughes
KPMcNamara
5038 E Mariann Avenue #5-B
Vancouver, WA 98661

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

Mr. Hughes:

Thank you for your letter of August 1, 2007 and August 16, 2007. As you know, KPMcNamara is subject to the Dangerous Waste Regulations (WAC 173-303).

While one-time, infrequent collection and storage of cumulative waste at KPMcNamara is not a violation of the Dangerous Waste Regulations, the storage of waste in the concrete sump - which is not designated as a secondary containment system - is a violation of the Dangerous Waste Regulations. Inspection of the sump, which is located outside the building, shows that the concrete sump is not free of cracks.

The Dangerous Waste Regulations state that land disposal of dangerous waste is prohibited when dangerous waste is accumulated in a manner consistent with these standards. Storage of dangerous waste in a concrete sump is not a sound, reasonable practice, and is liable to result in releases of dangerous waste.

KPMcNamara is hereby notified that land disposal of dangerous waste is prohibited. WAC 173-303-200(1)(b)(iii), 173-303-140(2)(b), and (64) refer. Therefore, the following actions are:

1. Immediately upon receipt of this letter, KPMcNamara must stop using the concrete sump as a storage area for dangerous waste. KPMcNamara must determine if dangerous waste has been released to the environment. KPMcNamara must remove all dangerous waste from the concrete sump, and clean the concrete sump. KPMcNamara must determine if dangerous waste has been released to the environment. KPMcNamara must remove all dangerous waste from the concrete sump, and clean the concrete sump.

2. Within thirty days of receipt of this letter (by September 20, 2007), dangerous waste must be removed from the area and placed in a properly labeled, closed, and structurally sound drum. The container must be managed in accordance with WAC 173-303-630. The drum must be kept closed during storage, and fitting all design criteria. Within thirty days of receipt of this letter (by September 20, 2007), the container must be kept closed and locked, and must be marked with the date "August 16, 2007." The container must be kept closed and locked and must be marked with the date "August 16, 2007." The container must be kept closed and locked and must be marked with the date "August 16, 2007."

G

3. must be stored in a manner which prevents contact of the contents with the environment.

4. Within 30 days of the effective date of the permit, the residue (waste) generated during the closure of the hazardous waste surface impoundments and the design and operation of the closure system shall be evaluated and the results submitted to the Agency for review prior to start of the closure observed work.

5. Within 30 days of the effective date of the permit, the closure system shall be evaluated and the results submitted to the Agency for review. The closure system shall be evaluated in accordance with the requirements of 35 IAC 703.610 (2). Please refer to the enclosed *Guidance Document for Closure of Waste Facilities* (Publication #94-111).

6. Within 30 days of the effective date of the permit, a groundwater monitoring system shall be designed and installed in accordance with the requirements of 35 IAC 703.300 - 703.310. **NOTE: Because of the pump-and-treat system, the groundwater monitoring system shall be designed and installed in accordance with the requirements of 35 IAC 703.300 - 703.310 as soon as practicable after the effective date of the permit.**

7. Within 60 days of the effective date of the permit, the permittee shall include in the closure plan a description of the evaluation of the groundwater monitoring system, including the number, location, and depth of the monitoring wells, and a description of the evaluation of the groundwater monitoring system.

8. By November 28, 2007, the permittee shall submit a closure plan for the groundwater monitoring system. The closure plan shall be submitted in accordance with the requirements of 35 IAC 703.150 - 703.160. The closure plan shall be submitted in accordance with the requirements of 35 IAC 703.150 - 703.160.

The above comments should be kept in mind when preparing the closure plan. If the permittee has any questions concerning the above comments, please contact the undersigned at 217/782-9878.

If the permittee has any questions concerning the above comments, please contact the undersigned at 217/782-9878.

Sincerely,

Michael J. Hughes
Permit Section
Bureau of Land

cc: Mr. Jim Ryan, Permit Section
Mr. Jim Ryan, Permit Section

- A proficiency is a gross amount of remaining algebra from the same set of the water to/as a standard, a calculation in which the water is re-used to the primary and secondary stations, but does not consist of the same calculations, basketball fairness, etc.

- As it is shown, the negative value of the process set is a mode of an environment bernst, a total cost, compared as a negative value of the cumulative rate and the integral equipment in the area is 1.

I would like to get the above information to the perceptions of the following forwarded to you in the future. Unless I hear, please let Mr. McNamara be given the meeting the Lear Quean Gateway (Lt. Qs. Gt.) and the friendly WAC 173-303 requirements are generally in the enclosed *Quick Reference Guide for Dangerous Waste Generators* information in the Ecology website http://www.ecy.w

Please contact 360/407-6348461@ecy.wa.gov to have a copy of the above document three guidance documents, or subject to the Dangerous Waste Generator Workshop, which would be of the same concerns.

Sincerely,

Jft, . J j l l Y V \

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

cc: Doug Gis, Ci, Ty Ancowa, Ve Rerson Project Program

Enclosures:
Dangerous Waste Regulation (WAC 173-303)
Guidance for Calculation of Dangerous Waste Facilities
Quick Reference Guide for Dangerous Waste Generators

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

October 20, 2008

CERTIFIED MAIL
7006 3450 0006 1753 5260

Mr. Kerry McNamara
KP McNamara
3974 Hamilton Avenue
Cleveland, OH 44114

RE: **Immediate Action Required** KP McNamara, 503 SE Maritime Ave., Bldg. #8, Vancouver, WA 98661, RCRA ID # WAH000022556

Dear Mr. McNamara:

As you know, the Department of Ecology (Ecology) conducted a compliance inspection at KP McNamara's Vancouver facility on October 8, 2008. At that time, Ecology observed several violations of the State Dangerous Waste Regulations (WAC Chapter 173-303). An inspection Notice to correct the Violations was forwarded on October 16, 2008.

A follow-up conversation occurred on October 17, 2008 (refer to the enclosed October 17, 2008 Inspection Report) between Mr. Terrance Dutchman, the site's Assistant Director, and Ecology. Ecology observed that containers holding mixed contents remain at the site. Mr. Dutchman indicated that these containers were delivered, and are not the containers Ecology observed holding mixed contents during Ecology's October 8, 2008 inspection.

Ecology evaluated the contents of the property during its visit to KP McNamara. Several containers of mixed home-hazardous substances (HHW) appear to contain extremely hazardous wastes. These wastes were stored outside, exposed to potential spill, contact, or release at the container storage area and driveway.

KP McNamara is operating as a dangerous waste treatment, storage and disposal facility (TSD) by accepting containers that are not "empty" as defined in WAC 173-303-160. Per WAC 173-303-950, operating as a TSD without obtaining a permit to accept, store or dispose of dangerous waste is a violation. This violation must be corrected as follows:

1. Immediately cease accepting containers that are not "empty" as defined in WAC 173-303-160.

2. Within 30 days of receipt of this letter, test or otherwise determine which containers are holding dangerous wastes. These containers must be moved to a secured container storage area. They must be kept closed and labeled "Dangerous Waste" designation (WAC 173-303-090) and must be marked with the hazard (e.g., toxic, corrosive, ignitable, reactive). Within 30 days of receipt of this letter, provide a copy of the inventory to Ecology and documentation that non-"empty" containers are properly managed.

3. With the hindrance of the first tree run, on-emptying the generator design and the spoofs have stopped. Dangerous residues should be unclaimed to get the site. To twist the dangerous residues in the management and through permit at the dangerous TSCA Alliance to 3.0 days of receipt the first tree, provide a copy of the oil flag from the non-emptying tree turning the generator, provided copy of the manifest that shall now give our tree the above end disposed through the permit TSCA facility.

KPMcNamara has repeated the WAC 173-303 Dangerous Waste Regulations and expressed concern to KPMcNamara arcac's spoof from the same tree "temporary" that is in Ecology consideration for reinforcement. Hazardous Management (RCW 70.105F.080) is a detailed identification of the dimensions and a cattle on the cold rocks. Lyt information for cement and plug up to $10,000 per day per violation.

Contract (36400)7-6 3d4e8wi461@ecy.wa.gov 1, 1 about the Dangerous Waste Regulations or requirements should be available to your consultants.

Sincerely,

Dean Rams, Inspector
Hazardous Waste Toxics Reduction Program
Southwest Office

Enclosure: Complaint Report

cc: Brent Jotrge Onrseeenk, Environmental Consultants (nbgtie1@mccoa.net)
Douglas Vea, Ecology Waste Reduction Program (Douglas.Wiesre@wcai.uwsa)
Kerry McNamara, Mac, Nakamura (kerrym@kpmac.com)

Facility Name: KPMCNAMARA	Facility Type: QG PAGE 1 of
EPA RCRA ID #: WAH000028356	Inspection Date: 10/17/08
Site Contact: Terry Dudechman, (953) 677-1308	Inspector Name(s): Will Stevens, HWTR Doug Gies, Water Resources Protection
Address: 50 SE Main Avenue, Bellevue, WA 98661 City: Zip:	Focus: Compliance Inspection

Photo taken (Y/N): Sample: No

Notes (including areas inspected):

Inspection of Creekside (KPMcNamara) and Duchsman's auto body shop located at 1062 008th Avenue, Bellevue, WA. Present: Terry Duchsman, Doug Gies, Will Stevens.

While in the shop area, Doug Gies noticed a drum of used oil in the shop area. Is this a KPMcNamara drum? Duchsman said it belongs to KPMcNamara. Duchsman said the drum was supposed to be picked up in two months.

Is the oil being stored in Bellevue or Vancouver? Was it a Bellevue drum? Duchsman said it belongs to KPMcNamara in Vancouver. Duchsman said he would call KPMcNamara and request that the drum be picked up in two months.

Is the oil being stored in Bellevue or Vancouver? Duchsman said he would call KPMcNamara and request that the drum be picked up in two months.

Duchsman's shop is located in a strip mall. Duchsman's shop is located in the middle of the strip mall. Duchsman's shop is located in the middle of the strip mall. Duchsman's shop is located in the middle of the strip mall.

OUTSIDE STORAGE

- The wreckers are vehicles (pickup trucks, cars, etc.) that are being stored in the yard. The wreckers are being stored in the yard because they are being repaired or are being sold. The wreckers are being stored in the yard because they are being repaired or are being sold.
- Several vehicles were observed to have fluid leaks. The vehicles were observed to have fluid leaks because they were being repaired or were being sold. The vehicles were observed to have fluid leaks because they were being repaired or were being sold.
- The vehicles were observed to have fluid leaks because they were being repaired or were being sold. The vehicles were observed to have fluid leaks because they were being repaired or were being sold.
- Kent McNamara (McNamara) is a contractor for Duchsman's auto body shop. McNamara is a contractor for Duchsman's auto body shop. McNamara is a contractor for Duchsman's auto body shop. McNamara is a contractor for Duchsman's auto body shop.

- 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 d 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 d 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 e c 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 h o . u i s c a (f e o x r a m p l h e o n E ⊡ 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 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 e i 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 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 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

T o t e #	D e s c r i p t i o n
1 2	M a r 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 l o x d i a c n g e w r a o s u t s e . B e t w 1 a e n m d . : . o i n r c e h e e n s r / e b s l i u d e u e .
3	M a r k " C d u n a A s b o 5 u - t l " n c c f h e e s s i d u e .
4	· u n m a c r d k n e t d a A i b n o 2 u - t . i n c c f h e e s s i d u e .
5	O b s e o v 1 e 0 d / 8 M a 0 8 K " e B d u s T a o x l " r c e i v t o y e w o d u c t i w t s u b b e d w s e x t r e h m a e z l a v r d o u A s b o v u a i t s x t - e i o n f c e h l e l s o w - r e p s a i q l u e .
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 (s d i m h a l k e A) b i c 1 ½ l - t . f u l l .
A - M	M a r k " e 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 o b e p s e (n l o i d a s n) c d 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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C l e v e O l H a 4 n 4 d 1 , 1 4

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 a :

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 n 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 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 R 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 t s** D e a . n g e w r a o s u w t 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 m r u o l d a t 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 t h 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 2 a - 0 1 0 6 0 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 a s t s** 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 u 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 e s a e c c e p t e o n f f - s i t e T h 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 n 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 c o m m s s i s l e e r r i e a c l o d l s s o t e c o r r e v c i t t 3 e O 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 r e p a e n d t 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 c 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 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 t 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 water is not the only reduction inspection. However, the area requests the diamond (yellow) compliance with the three-cell vinyl-lined wet-bottom pressure compliance. Please also attach the same probing obtained from the quantitative analysis.

Contact me at 360-407-6348 (ecy) if you have any questions about this letter requirement. I am also available to work with your consultants.

Sincerely,

Dean Inspector
Hazardous Waste Toxics Reduction Program
Southwest Office

cc: Brent Jorge, Cnrse, Ensvide, Connes (tbarlemg_ri1@comcast.net)
Douglas Wise, Vancouver Reserve Protection Program (Douglas.Wise@ci.vanc

Enclosure: Compliance Report, Notification, Compliance Certificate

Fac Nlaimtey: KPMCNAMARA	FaciliDtLyQGype: PAGE 1 of
EPARCRAD#: WAH0 00022556	InspeDcattieo:n 10/08/08
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- Last Mark Dutchman visited the site on 5 September 2008. Mercury, xylene and benzene were detected in the soil during excavation. Dust control measures were observed to be adequate. Discussions took place between Mr Dutchman and Mr McNamara regarding the disposal of the contaminated soil. Dust control measures were observed to be adequate.

- Mr Dutchman also reported that groundwater contamination by mercury was suspected to be associated with the Pacific Power Valve (PPV), which is being decommissioned. The site was visited by Mr McNamara and flow data collected in KPMcNamara's report "Mercury Contamination Assessment" September 2008, which was manifested in the PPV effluent (Manning Creek 5 21 #4 JKT2h) was found to contain mercury at levels exceeding the site.

- Mr Jones noted that Mr McNamara had recently completed courriying in the period covered by the audit, specified that Mr McNamara had the environmental risk assessment report (NoRG Environmental Services Pty Ltd) prepared by Mr McNamara at the time of the audit. Mr McNamara assumed responsibility for the report.

- Mr Dutchman provided the following information to the audit team:
  - Manifest 0e0s4t0#5 0 3w8i5t JktJcKtoefs non - RCRA (Pdr #5 3 7 4 2 2e-0 3f) - = sit Aug 4 2 0 0 8 hmean idfiendsittn d itchaathwea swtaes'swa_s toeswtaatteer-'only dangewraosutse.
  - Manifest 0e0s5t2#1 4 1w7i2t JhJeKn (k4e6 0 0 gaw Wa so the sw ae fh MRPS Services Sept e3n02,e0r08.

- Mr Dutchman noted that whether the site was the waste treatment plant Kerry McNamara had the arrangements.

- We walked around the site and saw the mapping of the Weesa. Is bse fiteed weistwas (tehteostees dindortnetendee fion "temparsye" f iiWeAC1 7 3 - 3T0h3e) on tveenmeestpecifical knowout,thperodluadoteelmsa ofeodufrhteotlerse.vitehWeadt eSraifaDlaSheets andeviteoweidofoymcaBiusran "HBandTehBusdaesigansameexstremely hazarwdaosu(tseaEPWansgCeoW;Tl0eta)tdhHeBFuldleesrigansa_tsetsatteo-xoinly dangewraosu(tseaEPWansgCeoWeT02):

We conclouudrea speaontdtihoanMkrD.utchfomathisOefsfiate2:p1.5m.

POST INSPECTION

On October 2008 ęceaiEenhfariBmeJnotrgeonCsroene kEsnivdier onHmeeintdiatec thlaatabnaloyfsriesaffefdfurdMRPServhiacsehsowon-detceomtcaelnlcerhaetricourrsy.

On October 2008 ontaBorteJnotrgeonCsroene kEsnivdier onWheednitsaclutshfeedloyyi

- Mar :#i0i0f4e0s5t0 3w8i5t JktJcKtoefs_non+RCRA (Pdr #5 3 7 4 2 2e-0 3f) esite Aug 4 2 0 0 MBrJorgesnasfohwiasswtaesraionuetfotlewsa.sortinsewhlatser. beepmrofaindtlesignlaitsedda.ngerous.

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O c t o8b2,e0r0 8

- A tt h ti isrMerM.c N a mi ansr aak ia rr g r a n g é mv ea rs tt se d v a s p e dMs rDa ul t. c hhm aasn i . n d t b la e v e rd lim pa tk te h easr er a n g e a m e d n s s v e i a l d l MorM.c N a m ta c r a h a h d s e a s p e d f a c i p l e i t a y K t P i w o a n s . t e w a b l e t e r a l M R F S e r v p i r c 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 f h i l e a c t w e i t h s t r e g a c u r y (c a n d a m i n 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 n s l i d t l e 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 e r i e h 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 f a s u o n n d - s H i B t e F . u f o h w a t r h M e S D d S a f e h e d a y l c o m p l a e b t o e c d e s i g n a f 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 c 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 d V e T 0 2 .

I a l s o m p l a e b t o e c d e s i g n a f 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 c 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 d V 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 c e l 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 toxic)	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 c e l 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 Solid 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 l a b e M l r S . u t c h s m a a n i d t h w e a s l t c e o k l e d t e a . n s d 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 l D S o r m a t e S e p a l o s p t - i m o s t . 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 & Toxic Reduction Program

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

Southwest Regional Office	Northwest Regional Office	East Regional Office	Central Regional Office
PO Box 47775	319-0162 Ave SE	460 N Monroe St.	15 West Yakima Ave 200
Olympia WA 98504-7	Bellevue WA 98008-5452	Spokane WA 99205	Yakima WA 98902-3450
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 Notice of Compliance and Inspection Report (and/or Notice of Compliance) as appropriate.

You may request extensions to the Ecology Notice of Compliance and Inspection Report (and/or Notice of Compliance) as appropriate.

You may request extensions to the Ecology Notice of Compliance and Inspection Report (and/or Notice of Compliance) as 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 is complete.
3. I am a water treatment plant operator and the information contained in this report is correct.
4. I declare under the penalty of perjury that the information is true and correct.

Signature:	Print Name:
Position/Title:	Date:

Violation Code	Check Evidence Submitted	Check Evidence Submitted	Check Evidence Submitted
	Photo	Paperwork	Statement
-340(3) & -630(5)(e)	D	d	D
-170(3)	D	D	D
170(2)	D	D	D
-630(7)	D	D	D
-320(1)	D	D	D
-145(3)	D	D	D
950(2)	D	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:
Dave Willis, Northwest Regional Office - HWTR
Douglas Veance, Waste & Toxics Reduction Program

Instructions:
1. Violations identified must be corrected and the facility must be in compliance.
2. Do not mail in Certificate of Compliance.

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
-070(8)	Quantities of dangerous waste in excess of the limits specified in WAC 173-303-070(8) are subject to all applicable requirements of WAC 173-303 unless otherwise excluded.	D	D	D
-070(7)(a)	Large quantity generators must meet the requirements.	D	D	D
-070(8)(b)	SQG waste must be properly designated.	D	D	D
-070(8)(b)(i)	SQG exemption requires that the waste be managed in a way that protects human health and the environment.	D	D	D
-060(5)	If the waste is a RCRA D, the waste must be managed according to WAC 173-303-(222)0(1)	D	D	D
-060(1)	Site ID: Verify EPA ID number (call 206-553-1234 or visit www.ecy.wa.gov)	D	D	D
-060(2)	Revised Site ID form must be submitted to the designated employee within 30 days	D	D	D
-060(5)	Annual report must be submitted by the deadline [WAC 173-303-070(2)(a)]	D	D	D
210(2)	Copies of Annual Reports must be maintained for 3 years [WAC 173-303-220(1)]	D	D	D
210(3)	Waste designation must be done by a person [WAC 173-303-070(2)]	D	D	D
-180(1)	Owner/operator must be properly trained [WAC 173-303-170(2)]	D	D	D
-210(1)	Signature requirements must be met [WAC 173-303-070(2)(a)(i)-(180(3)]	D	D	D
-220(2)	Annual report must be submitted within 45 days of the end of the calendar year [WAC 173-303-170(2)]	D	D	D
-140(2)	Records must be kept at the facility [40 CFR 262.40]	D	D	D
-010(7)	Large quantity generators must meet the requirements.	D	D	D
-170(3)	Treatment must be done in a way that does not violate other laws.	D	D	D
-300(5)	R13 waste must be managed properly [WAC 173-303-(32)(a)(i)(d5-)(a)]	D	D	D
-170(1)	Waste must be properly designated.	D	D	D
-070(4)	Waste must be designated [WAC 173-303-070(1)]	D	D	D
-070(6)	All applicable designations must be made [WAC 173-303-070(1)]	D	D	D
-141(2)	State D-Code must be in accordance with the hierarchy.	D	D	D
-630(5)	Containers must be in good condition [WAC 173-303-170(1)(b)]	D	D	D
-200(1)	Dangerous waste must be stored in a way that does not violate other laws [WAC 173-303-170(2)]	fgl D		fgl
-630(3)	Containers must be in good condition [WAC 173-303-200(1)(b)]	D	D	D
-630(5)	Containers must be closed [WAC 173-303-200(1)(b)]	D	D	D
-630(7)	Containers must be labeled [WAC 173-303-200(1)(b)]	fgl D		D
-082(3)	Solid waste must be managed [WAC 173-303-070(3)(a)(ii)]	D	D	D
-630(6)	Accumulation must be properly [WAC 173-303-200(1)(b)]	D	D	D
-200(2)	Satellite accumulation must be managed [WAC 173-303-170(2)]	D	D	D
-200(2)	Accumulation must be managed [WAC 173-303-170(2)]	D	D	D
-630(8)	Containers must be closed [WAC 173-303-200(1)(b)]	D	D	D
-200(1)	Accumulation must be managed [WAC 173-303-170(2)]	fgl D		fgl
-630(4)	Containers must be in good condition [WAC 173-303-200(1)(b)]	D	D	D
-630(9)	Incompatible waste must be separated [WAC 173-303-200(1)(b)]	D	D	D
-630(5)	Minimum separation distance must be met [WAC 173-303-200(1)(b)]	fgl D		D
-201(2)	Disposal must be in accordance [WAC 173-303-170(3)]	D	D	D
-016(5)	Notification must be made [illegible]	D	D	D
-505(2)	Land disposal restrictions must be met.	D	D	D
-802	Compliance with other requirements.	D	D	D

EPA ID: WAH000022256	Facility Name: KPM McNAMARA	Inspection Date: 10/08/08	(Page 3)

Facility Status Evaluation Key: V = Violation NA = Not Applicable PV = Previous Violation

WAC Code	MQG Requirements (cont.)	Facility Status V	NA	PV
173-303-340(2)	Communication with public/local authorities during emergency response [173-303-200(1)(e)]	D	D	D
173-303-340(1)	Emergency coordinator provided information to local authorities about accumulated quantities [173-303-200(1)(e)]	D	D	D
173-303-200(1)(c)	Post-closure plan/notice to land records of former hazardous waste disposal units [173-303-610(2)]	D	D	D
173-303-200(1)(c)	Designated emergency coordinator available at all times to respond to emergencies; coordinator qualified to make assessments of facility conditions affecting environment [173-303-200(1)(e)]	D	D	D
173-303-320(1)	General facility standards [173-303-200(1)(e)]	IZJ	D	IZJ
173-303-320(2)	General facility standards [173-303-200(1)(e)]	D	D	D
173-303-320(2)	General facility standards [173-303-200(1)(e)]	D	D	D
173-303-320(2)	General facility standards [173-303-200(1)(e)]	D	D	D
173-303-320(2)	General facility standards [173-303-200(1)(e)]	D	D	D
173-303-340(4)	Arrangements with local authorities documented [173-303-200(1)(e)]	D	D	D
173-303-515	Requirements for emergency power	D	D	D
173-303-515(4)	Used oil management practices	D	D	D
173-303-515(5)	Used oil management practices	D	D	D
173-303-515(6)	Contaminated used oil [40 CFR 279.22(c)]	D	D	D
173-303-515(6)	Used oil [40 CFR 279.22(d)]	D	D	D
173-303-515(6)	Used oil management practices	D	D	D
173-303-515(6)	Used oil management practices	D	D	D
173-303-515(6)	Used oil management practices	D	D	D
173-303-120	Recycling/reuse/recovery facility	D	D	D
173-303-525(1)	Regulation of hazardous waste recycling	D	D	D
173-303-505(2)	Recycling activities	O	D	D
173-303-505(2)	Land disposal restrictions	D	D	D
173-303-525(1)	Recycling activities	O	D	D
173-303-145(2)	Aspects of the environment to be considered immediately	D	D	O
173-303-145(3)	Aspects of the environment to be considered	IZJ	O	IZJ
173-303-573(1)	Management practices	O	D	D
173-303-573(1)	Universal Waste Batteries, Lamps	D	O	D
173-303-573(1)	Universal Waste Batteries, Lamps	D	D	D
173-303-573(1)	Universal Waste Batteries, Lamps	D	D	D
173-303-573(1)	Universal Waste Batteries, Lamps	D	D	D
173-303-640(6)	Daily inspection of air pollution control equipment	D	D	D
173-303-640(5)	Tank systems	D	D	D
173-303-640(4)	Secondary containment (24 hours)	D	D	D

Facility In Compliance (general statement based on inspection) YES [ ] NO [ ] Complete 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 Sams, HWTR.
Doug Vance, Water Resource Protection

Instructions:
1. Violation must be checked as an exception to Need to Comply.
3. Document that the violation has been corrected by Ecology 30 days, in the 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]	[illegible]	[illegible]	181	D	D
[illegible]	-330	The training requirement [illegible]	D	D	D
[illegible]	-330(1)	A program [illegible]	D	D	D
[illegible]	-330(2)	A DW training [illegible]	D	D	D
[illegible]	-339(2)	A written [illegible]	D	D	D
[illegible]	-330(3)	Personnel [illegible]	q	D	D
[illegible]	-350(2)	A contingency [illegible]	D	D	D
[illegible]	-350(3)	Contingency [illegible]	D	D	D

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

WASHINGTON STATE DEPARTMENT OF ECOLOGY
Washington State Department of Ecology
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 St.	1250 W Alder St
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 the attached compliance schedule within 30 days.
2. Are-inspections may be conducted in the exercise of your recent violations.
3. Formal enforcement action is not required at this time, however a future violation.
4. Correction of the following violations must be completed within the schedule.

Inspection Type: ☐ Compliance Evaluation ☐ Compliance Assistance ☐ Case Development ☐ Follow-up Inspection ☐ Other _____	PAGE
Facility Name: KPM cNAMARA	Inspector Phone #: Dee Williams 407-6348
Inspection Date: 05/07/08	Inspector Signature:
Other Inspectors: Nolan Stewart, Dou Wyatt, Vea, Nco Water Resources Protection	State ID/DEP #: WAH000025556
Site Contact Title: Terry Duncan, Manager Operator Site 360-695-2455 Cell 251-377-3088	Other Contacts: Kerry Nam, Owner 216-361-895 Brent Gerke, Environmental 503-692-8118
Site Address: 505 SE Main Avenue, Suite B Vancouver, WA 98661	

Violation Code (WAC 173-303):	Written Stuenn Notice of Violation Attached Consent Order Attached
-346(3) -630(5)(c)	WAC 173-303-200(1)(a) Dangerous waste must be stored in a manner that minimizes the possibility of fire, explosion, or any unplanned release of dangerous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment. Access to the facility must be maintained at all times so as not to obstruct movement of emergency personnel and equipment within the facility. Observation: The warehouse was observed to be cluttered with various materials, including boxes and pallets, which obstructed the aisles and access to the emergency equipment. The warehouse was observed to be cluttered with various materials, including boxes and pallets, which obstructed the aisles and access to the emergency equipment during the inspection. Required Action: Upon receipt of this notice, the facility must immediately remove all obstructions from the aisles and access to the emergency equipment. Photographs of the warehouse showing the aisles and access to the emergency equipment must be submitted to the Department within 30 days of receipt of this notice.

KP-McNamara Portait, Inc. Comply PAGE 2

-1730	**WAC173-303-200(1)(e)(iii) and 40 CFR 264.1030(a) and (b): Failure to monitor the secondary containment system for at least 90 days.** Observation: Attleboro Distribution Center was storing waste in containers in the Warehouse (WAC 02) when it was observed that the containment system had been out of service for at least 11 consecutive days. Several other measures have been in place since then. Required Action: Upon notice of inspection, the company immediately put the containment system back into service and started monitoring it. The company provided a copy of the inventory of waste in the containment system and a copy of the monitoring log. The company also disposed of the inventory of waste in the containment system within the 90-day specified in the Compliance Certification.
-1720	**WAC173-303-200(1)(e)(iii) and 40 CFR 264.1030(a) and (b): Failure to identify "Hazardous Waste" or "Dangerous Waste" and/or "Hazardous Waste" or "Dangerous Waste" on containers containing waste.** Observation: The inspection team noted that containers of dangerous waste were not identified as containing dangerous waste. Required Action: Upon notice of inspection, the company immediately put the containers into compliance. Certification of compliance was provided.
-6730	**WAC173-303-200(1)(e)(iii) and 40 CFR 264.1030(a): Failure to provide adequate secondary containment system.** Observation: Otvieo 3 0 n, s 0 0 a 0 l o d n a $ n g e w a s u t s e b e i s n t g o i n e s l i d e K P McNamara Portland Warehouse. The containment system was not adequate to contain 100% of the volume required. Required Action: Upon notice of inspection, the company immediately put the containment system back into service. Certification of compliance was provided.
-3210	**WAC173-303-200(1)(e)(iii) and 40 CFR 264.1030(b): Failure to record weekly inspections.** Observation: Stpiiolnlsseon c w e r e o b s e r v e d d u r i n g a r e h o u s e c o u n t d - d o w n t o t h e e s a t, i n t e r e a n c h e a u t i s l i i n A k n y. d t o t e f s n k n o w s w a s w t e e r o b s e r v e d t h o e u t s s i t d o e r y a a g r e d . Required Action: Upon notice of inspection, the company immediately put the weekly inspection back into service. Certification of compliance was provided.

KPMcNamara, t Compliance	PAGE 3
-145(3)	**WAC173-303-F1a4i5l(ur)et i g p t e n e l e a s e s .** Observa Spiiwdenlsseo 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 Res iwdauaelsobseovezdingralivtecsstetsoorueldside RequActed bmnsed iiantsepilnysaindodeu t sa ir d e a r s m d i t i a g n a y t e d e l e a s e Wheynoruettuheemcl6sreapl Caerrdc pfriccvaitdee, s corfainpaytcitcirron takteonleasnpuipAllpsccovaidelecrcivphtaitotnwcibrlestlaktepnrevent futruerleetadsheesiort,dhgeraovuetlsthdee building.
-950(2)	**WAC173-303-F9a5 0t(ur)evaeperrmiatccetprteoadtispoflangerou waste.** Observa Ftoi'lonmosn:- etmoptwteyss'etoorueldsKPMceNamawraar'eshouse Thetsewwesset oarleodwnigdthhteortaersr ifvriomnfgfesistemhlestfootuer werrei"oetmpatsdye'f'ii.WeAC173-303a-1h6PM(c2N)amcaprearastaed dangewraosuttsreeatsmteonratangdlespfoascaillity. RequActed bmnsed icaetatshpsyraotáicccceept tbitweightlazarrdeosuisdu unletlsstsoetareempatsdyef iiWeAC173-303D-1s0(t2)ed lowin wast1e.a):octfenknsowwiads2et)wtoobefsnknbiwq(umiadrakseld'HB Fulaen3l".)aoctfenknbiwq(umiadrakseBlusaDre"s)i.gmaumtnieetnthe WAC173-r3e0c3uirWhmeymotruse.ttuheemcl6sreapl Caerrdcepfriccvaitde designafoomtmEdcobAdgpoovindfeoranladttuhbenioogfihweaste (iwleeiatrroneelnwlleeinweasgeneraantvehdy)hweaswtaesccepatec KPMcNamara.

Other Requests

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, Washington 98504-7600 • (360) 407-6300

September 26, 2007

CERTIFIED MAIL
7007 0710 0002 4561 7252

Mr. Kerry McNamara
KP McNamara
3977 Hamilton Ave
Cleveland, OH 44114

CERTIFIED MAIL
7007 0710 0002 4561 7269

KP McNamara NW, Inc.
503 SE Marine Ave #5
Vancouver, WA 98661

Re: Compliance Complaint at KP McNamara, Vancouver
WAH000010603

Mr. McNamara:

Thank you for your September 12, 2007 email with the completed application for KP McNamara Vancouver.

As you know, violations of the Dangerous Waste Regulations were noted at KP McNamara in August 2007. The most serious of these violations was addressed in an Immediate Action Letter that was forwarded to [illegible]. I forwarded a copy of that letter to you on September 5, 2007.

This letter addresses the remaining compliance issues identified at the Vancouver facility. The [illegible] Report [illegible] Compliance [illegible] within the prescribed time. As you know, failure to correct [illegible] could result in further enforcement, including penalties issued under the Hazardous Waste Management Act (RCW 70.105.080) of up to $10,000 per day per violation.

I have enclosed guidance documents and a copy of the dangerous waste regulations. This information is also available at www.ecy.wa.gov.

Please contact me at 360/407-[illegible] or at [illegible]@ecy.wa.gov if you have any questions. I am also available to [illegible] your consultant at the Vancouver facility.

Sincerely,

Dean Williams
Department of Ecology - Southwest Regional Office
Hazardous Waste and Toxics Reduction Program

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

Site: K.M. McNamara **RCRA ID: WAH000022556**

Inspection Dates: August 1, August [illegible], and September 12, 2007

Site Contact: Jeff Hugh (General Manager)
Kerry McNamara (President/Owner)

Phone: 360-696-6423

Site Location: 5501 E Mar[illegible], Ste B,
Vancouver, WA 98661

Generator Status: SQG

Ecology

Lead Contact: Dave Williams, HWTR - SWRO. Phone: (360) 407-6348

Other Representatives: [illegible], HWTR - SWRO
Doug Wise - City of Vancouver Water Resources Protection (360) 696-8008

Report By: Dave Williams ______________ ______________
(Sign) (Date)

Background

K.M. McNamara is a multi-trades construction company. The company operates several facilities [illegible]. The Vancouver site is [illegible] controlled by Kerry McNamara (owner/president) [illegible].

The Vancouver site has been operating since 2004. The site comprises a warehouse building with a large outdoor storage yard. Several waste-generating activities take place, including:

- Waste resins (cured and uncured) from [illegible] – both dangerous and non-dangerous residues may be generated;
- Wastewater generation from [illegible] the site [illegible] dump;
- Wastes [illegible] on-site [illegible] system;
- "Dirty" absorbent [illegible] outside building;
- Salt-water [illegible] are cleaned.

K.M. McNamara [illegible] Ecology [illegible] in March 2005 to discuss start-up [illegible] (see correspondence April 18, 2005).

The compliance [illegible] follow-ups.

August 1, 2007 Inspection

Conducted by Dave Williams and Doug Wise.

This was an unannounced [illegible] inspection [illegible] we arrived on site at 9:30 [illegible] introduced ourselves to Jeff Hugh, the General Manager [illegible] General Manager.

h a b d e e w r o r k a i K n P y l c N a m l a e r t a l 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 d 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 o s o n ' n c d r y e e T s h e . 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 o 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 o e n s c d r y e v e 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 d " 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 9 E M S r g h . u g h s e a s ' I E 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 d 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 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 a l 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 f 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 e 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 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 k 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 k 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 h 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 o b e . . c o n v e y a n r r i e n a r s n i e d d o h a o 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 n 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 t 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 æ l s a u d e a d s h o n - d a n w g a e s r T o e h u e s i r a e f l s o m n l p o c a n t e e 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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- Wedisculhsostvehwdeaswhatreer-cirscyuslttaetmrMdsnH.ughweassoatbtefully exphaowtrhreintsaenwkesrceonnetcotheeed-cirscyuslttaetmrd,jmdoftuelxlyplain whatypoefwsasweesdeischtadrhgfeelobor MsHuumgph.esnosrtatahdok",dirritnyse tanwka"s,sevchetnotaerfseiwrasthoeudWeusepdHpatedretshtleiqiuthideank,

- a n f l o u t n h d i a h t t a a d p H b 6 o 7 H e s a f l d w i a s s w t æ s s o m e d t r i a n i e s m e t d b r u a m m d m a n a g o e f d - o s i w t t e u m p t e d d h f e l e o m p .

11 T h s e 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 e 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 t o d i a { p o t a h s y s d i r u o m a x n i s d o 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 l 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 l 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 l d 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 l d t e o p t e r w v a l 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 o u t s . "

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

- W e · 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 h s e o u e t n h o l 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 a 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 e 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 .

W e c o n c l o u u s r é d e a . n t m o 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 o d 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 o n r g h m a z a r w d a o s u t s a e t 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 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) .

W e 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 h e h g a t ä e r e p l h 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 o e u d t w a s d t e s i g a a n d i m d a h 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 o b 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 o c e t .

August 21, 2007

OnAug2s12t,0 0I3 powkieP Ih iSleirpv i c e s about MTahmecyf a stth#A0tei d 6 9p 1 2 wat lster a n s pa o tdvtteeortw,eesmree c e ai tvheeda c iThietsyet ta a c o m b ivroeldume o 5 5 g0 a l lSbenes-.mdaai tAeudg 2 s12t,0 0 7 .

Augu2s82,0 0 7

OnAug2s8·t,2 0Ed c o, Ifoogrywa KrPKdFMdc N a m a a r m a m e daicattlieo tttdeirrpercotp e r m a n a g e o n f e o n r t r d a i e g e w u a s . S O h S e e . p t e 4 m 2 0 e 0 E 7 c , o l l o e g f t y t e l e p m h e o s n s e a g e w i M h H . u g h t e d s i s c t u h s e e s t E t e o r l a o l g s y o n t a M o r K . e d M r c y N a m a h p a r , e s o d e n t K F M c N a m a O r m S e p t e 5 m 2 0 e 0 E 7 c , o l s o p g o y w k i e M h M . c N a m a a m f a o r w a h r i d m e d p y o f h i e m m e d a i c a t t l i e o t n H e s r a h i e V o u l d p r r e o f b e a r b i l r y o i n s s e s t o T e a r D y a t t i l o , h i s - c o n H s e s u a M d H n u t g . h h e a s d o d t i s c u t s h p e e d b w e h h a e r y e t r h o u g h h a j d u s t t a l w k i e h d h m .

Septem0b2e0r07

OnSeptem0b2e0r0I7 w a e s n t a o y B t r e e d n o t r g e o n C s r e e n e k E s n i v d i e r o C r o e n s t² a l t i ' n . M r J . o r g e i n n s d e i n c l a h a e v a l m s e e t w i i n K g F M c N a m l a a r t a e h n d e a t y d i s c c u o s m s p l i a n c e i s s u H e e k s a d e c e a i c v o e p d y f h l e m m e d A i c a t t l i e o t h a t n e v d r a n t t e d d i s c o i m . p l l s i . s a n c e i s s u W e e s d i s c u t s h s e e i s s s e s u a e k s e s a h i e v o u c l a m h e w i a t m f y u r q u h e s t L i a o t h e s r . t h d a t y , I M c d H n u t g a h d W t s e a . g r e t e m e e a t K F M c N a m o a r S e p t e m 1 2 e 0 r 0 7 . I a . t e r t a l w k i e M d h M . c N a m a n h d e , i n C i r e e k a s n P d h e i e r p y i t s o m e s u t s a · t h f e a c i l i t y .

Septem0b2e0r0F7o l Uopwn s p e c t i o n

C o n d u b c y D e W i l l N a m h L a a n t a y n B k o W g i s e
A t t e n K d e , M r r c y N a m a a A g a s , m u (P h S fi V o i B c r e e J s m o) t r , g e a n n s E e r r K i n r (C r e e k s i d e

A f t i e n r t r o d w u e c t b i u d r h e w s a , r e h a o n u d s i e s c u t s h s e e d l i o s w s i u n e g s :

- M r H . u g h w e a s s o l o n v g e r r k a i K n F M c N a m a T r e a r . r B a n t e h w m o a u m l e d p l a c e h i m .
- M r M . c N a m s a a r a a b l o 7 u 0 t % f h o e p e r a w a t a s o n c u o s m e e d - c o n s t t o r t C e q s t u . s h e d t o t w e e s s s e e n 6 h i f n c a r l a s r t e i c o y s d M I r M . c N a m s a a r h a e d i d w n a ' r t t t s e n t c h e m . o v e r - b s u l e t e d s i d k n n ' c o t w a n y o i n t e h s e , t w a h t e e s c y t c h p e e l d a s t i c .

11 O n B y 0 % f h b e u s i w a e f s o s c u o s m e b l e a a n n i r c h e g f u r b o i s T e h s i w e n a g s w h a t t e h r a t g 9 e t s o h t e r e a n r c f t h l e o n m i p s r w a n s h t i h m o e u t s o i f c b e t a e n s f d , r d r h s e e c o n (d a r y f i n r a i h) s i t e s . e d i y l s u o t a e p a y t S o m a e m o u o n f s t o a w p a y t i e s r l a b l o t w o e e d - c i r c t u d l h a w e t a e s h y s t N e o s p e c i n f f i o c r w a a p s t r i c o v n o i n d l a v d o s l . u o m i e t , s c o n s i s t r e a n c c t y e / r c i h s a t i c .

- T h V e a n c o f u a v e h i r a l a s i ' t c y a u w s a t s (h p ' o t a h s y s d i r u o s x y i s d t e e) n M . c N a m s a a r f a b l e s o l u h t a i d p h b 1 3 o 1 4 T . h v e a s f t r e o m s y t s h t i v e s n s u p p c t s b e r d o u b t a e d l a h o l d t i a m w g h , e i r w t e a s e u s e n d w t a i s l o d o i r H t e s y a f l d s e o l u w t a i s c h m e n a g e f d - s i a t s e l a n g e w r a o s u T s e h i u s u a h a b p y e a n b e o d u n t c a y e a M r r M . c N a m s a a r h a e d t h o u M g r H . t u g h h e a s d o n f t u l s e o d a p a n d s y c s a t e e n h t s e i n c s h t a v d e u m p e d

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[1] C o n t k F M t c : N a m a 3 9 7 H 2 a m i A l v t e C . n , e v e O H 4 4 1 1 P 4 h o 2 4 6 - 3 6 1 F a 2 9 5 5 3 6 1 - 8 9 5 6
[2] C o n t C a c e e k E s n i v d i e r o n m e n t 2 a 1 1 7 S D W C r h s e u h C a t T i i u s g l , C a R 9 i 7 r 0 , 6 P 2 h o 5 0 3 - 6 9 2 F a 8 x 1 : 1 8 5 0 3 8 5 - 9 7 0 2

caus s b il ct t o ih o e h s o m p M r M. c N a m s 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 m n y o r e .

11 M r M. c N a m s a r h a e h a c d o n s t r d u c a t w i f o t r g h s e u i l l d i s m a g f . d t e r e a n r c s h u m p w e r e p o c x c y a t M e r W. i s s e a h 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 r i a d h e v o u i l n d c l t u h d w e n i 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 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 l 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 k 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 v c e i t n e a c s b e s o i p a i t s h e M r M. c N a m s a r a t a d 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 é r a i w r a i s n v g a i M a r M. c N a m s a r a t a d y e f f e O 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 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 o f é s q i u t i h s e u m l p M r . J o r g e s n a s f o d 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 g 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 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 d a r 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 r a t a d 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 d 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 a w e h r e e m s o v e d .

- M r M. c N a m s 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 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 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 e h w e a r e h W u e s e t t e h d e o l l o w i n g c o n t a i n e r s :

  - T h r t e e t l e a s b e a " e n d b a z a r d M o r M. s N a m s a r a t a d l e t s o e t c e o s n t a i n e d " u n k n 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 r e v i o u s l y s t c k n 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 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 a z a r d N o a u 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 a z a r a l 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 a z a r a l 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 i " M. c N a m s 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 a l l u b 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 m 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 r a t a d 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 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 9 u - l l a t M e n M c N a m s a a r a t a l d 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 u a s u s M r M c c " N a m s a a r d a n 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 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 t u h s l e i m e a k s 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 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 d 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 t H . u g h h e a s d i l t h t e i o s b 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 t 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 s l a s h e a k s 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 c 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 c 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 n 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 o 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 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 f o t n h e e i n 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 n 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 n 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 n 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 o s u n 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 i 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 o 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 c t 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 l s i g w a S r t e e s n i g w r 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 k 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 d e s t e m 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 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 , a s t i t h a a i n s p a g n a d t e e s r c) r , o i l p o t v i c o m t a m i a 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 I O 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 l s e e f n u d o a q u a t e l y d e s i g p n a t t e d f d 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 h (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 t h e a s a g e d f - T s h i i t s e f . o r m u a s t h 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 , a u n w 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 reorvd ied s ei g in a f o o fmcat rhfeco In l wo av sisht gr e a m s thwaet roe b s e o v e e d 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 w 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 i 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 a t s d t e)
- W a s f t e c o n a u s " p r o d a n c k " .
- W a s f t e d i n h s o m m p i x v e i d t h c a u s p r i o d t u a c 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 i n d - , R e g w u a l s a i t t n e d " d r u m .

D e s i g n i a t f i o o m m a y t r 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 w i e d s u o e z i o 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 d t (u b r o 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 i g a c t e h S t e a r t a e n r s p d s e i t 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 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 a h m e a n i d f i e s s c 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 a n d s o n t a n

adequsate conc oanrtya itnhmdeyndohta vaedequcate corporlcsp,ae b ealnichg; thwy mneoptr opienrslpyet co t epdreevle ratscesntvhier onment.

RequActe dEccro:l dgnymesAicattLieo nter previtohoes tecyalnoasdufdrrees s thfel s ommEcologdyi saclussbsecalho sofuhrei nt sanaknsdtainlesaksto durtilmSeepte1m12,e0r0i7nspeTlhtfeoolnl.fowrichlgueericstricovnided:

11 Wit h4dlay sr eccefpltetftiemdlie,schon tarmhaisaks tEgmso loobgsyerved thsactmoefhwicsrwlasompoeSteepte1m12,e0r0A7nyes i(dvuavsanter) generbaydteecdlon tarmhlinteaaastkisntgreumsstepropaecrcluymualnadtteesdignate asrequiiWrAeC173-303-070.

11 Wit3h0dlayosfecefpltestatnedfctleeaenaicsnhgsteevma,leuaacthenk systtelmeterimfiazearcdoonusstiwteureenrtestadsheechvirolhmiesnt. evalumautsnitoenfdthcespuemrefor.msatnacondeafriidWsAC173-303-610(2 Pleaseetebhaet taGuhiedlafmCorleeCalno solD.aJnrgeeWraosuffsacilities (Publ#0e4t-)lon

11 Wit4h5dlayosfecefpltestptreorva,wdeitetpetoEctolwohgiycrhcludes. a descroifphtteiaonykstecomrlsstr(uectthiseo,ze/diomfehseysstjeomi,nt configpuirpaatnicgptnhi,nrtepgamoatfishteaaykstAmhpoovthneesofhes evaluiantcilound,ingenoybfserevnecde pracscbrlaegmksstshuecOh.01- inophi,tting, voopitdhsen,rompaithbhesimcgrTehtiesf.orwnibteliscet,dn deterimfiazearcdoonusstictbwuhslandbtesen rtesecigsrecdundwater.

5)WAC173-303a-r1270(0(2h)yr(edf)erEacdtuprreovaildabtehlat identi thmeajoirsla$sscwiathlvaesitmehcontainers.

Observ TtheotaensdrumdsangewraosuatsecumualkaPMeNlamdaindot inclruidsakbels.

RequActe dlommmedi uapbreelcyefprtespbarttepltaensdrumsdenthiefy ri(sikteexcjocr,rcestidW.ie)t,.Ph-ichasyusopmhdto-doctumecnttaatiinpenrs havbeepnroplearbleybleedtthiemfnyedriiastke.

6)WAC173"303-a2r0d.(2h)yr2)ferFeanicleudreevelopfcahadldwor writitnesrpesctiedlogreenefraaclii hispyections.

Observ Spiiwdenlrsseobserved nodiuntsstihldsaerehanislatep,peatrte)dat operavteonestwacrfeequirtemmietnisgpaitlheletsnhey caunrdlindoftolow. aimspescctheodnfulhfeacility.

RequActed Woint3hOcralechalydse,vealnodfpolalowwriintstpeescctheodnofhe inspeachtbimigteoqruiinpgsmaefhaetnt,elymergency seeqcuudrpeimteyonts, an operathsdhguequiratrhhdanettpevdeentte,cts ptobnadzatrdhseublic headtlheenviroPhnmoevaictd.epyfhiirsspescctheodnEctelogy.

.7)WAC 1 7 3 - 3 0 3 - 2 r 0 b D y (4 f (e 3) 3 n F c a e i l t u p t r e o v a i n a l e q u p æ t r e s o n n e l t r a i p n r i o n g g r F a a m i . l t u p r r e e p a a n m d e a i n a v a r i n t p t e e r n s o t n m æ i l p n l i a o n g t , o m a i n t a a i n i m e i o n g r d s .

Observ a O p i e o r a d s t i n d o s t e e a m b t e l e f t i h d e i f f e b r e e t n w d e e e m g e a r n o d u s n o n - d a n w g a e s r a i o e d t , s i n d o t a w e a o 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 o 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 r e b s y S e e o d l W o g k y 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 A c e d W o i n t s 3 t 0 d r 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 g p r o g w r h a i n s c h h a i 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 . 1 7 3 - 3 0 3 a n 2 l 0 r 0 e (f 1 e) r (e 3 n 5 E 0 a : i l t u p r r e e p a a n m d e a i n a a i n a d e q u C a o t n e t i n P g l e a m e l m e r g e p r o y e d u r e s .

Observ a A C o o n t s n P g l e a m a c s y n p o r t e p l a y t e n f e a c O p e r t y a 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 r 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 A c e d W o i n t s 3 t 0 d r 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 c r p i c t o e n t i n p g l e a m c y a n e l m e r g e n c y p s r e c q e i d W r A e C d 1 7 3 - 3 0 a 3 n - d 3 3 4 5 0 0 .

9)WAC 1 7 3 - 3 0 3 F 3 5 0 t u h 2 e v a : p e r m i 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 a M t r H . u o g h s a e c s k n o w l t e 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 d i 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 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 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 A c e d l o m n s e d i c a e t a e s h p s r a c o t a i c c c e e p t b i t w e i g t h a z a r r e d s o i u d s u e , u n l e s s t s o e t a e r e e m p a t s y l e f i i W e A C 1 7 3 - 3 0 3 W 1 6 0 (2 d o a f y e s c e f p t t h l i e s t p t r e o r v a , w d 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 c o m p v l i y t l h i s r e q n u t t h o f e e u m e l m t e a d e l e c r o i a p r t p y i r o o n t o o l s d e t e r m v h n i t c h t g e u s b t e " e m p h t o y K ' F M c N a m e a m r s a u t r h e a s t . t a e r e e m p t y w h e t n h a y r a i t v h S e a n c o f u a v c e a r h l d o 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 r e s p o n s e i m b p i t t l o y i p t e r y s i o t r o f s l a i p r e e n t .

. KMPcNamara
Inspe Dtetis6:m 0 1 8 0 7 6&/90/71 1 / 0 7

RCRA IWDA#H 0 0 0 0 2 5 2 5 6
Pag1e2o f 4

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 J 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 o g n r a m , A t t e D e W o r l / P O B o s 4 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 p r e q u e R t e d e e D a e W i l l i a (3 8 6 4 0 0) 7 - 6 3 y t 4 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 d 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 y n 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 f o o m c a 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 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 w 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 o e b s e o m e d i n S t e e p t e m 1 2 , e 0 1 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 { R e p s s e b a v p a s (t m e i w e 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 r a u s t a i w d a , s f t r e o f n h e o m (p m i w e d a u s a t n i ' d s) o , l i d , n o n - r e g a s t a 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 m 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 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 n 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 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 y n e s l A i c a t t L i e e h p t r e e r v i a c 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 , e 0 1 0 i 7 h s p e T h t e o l n l . o w i n g	

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 r o s . l o o b g s y e 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 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 .	Wit h 4 days	
• 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 a d t h e s k s t e m ? t e i n f r a z a e c d o o n u s s t w e u n e n t 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 e 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 q n) .	Wit h 3 0 days	
• Wit h 5 d a y o s f e c e f p l t e s t p t r e o r v a , w d 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 d d e e s s c r o i f o 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 c t e m f , i g p o i n p a i 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 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 1) y r (e d f) e r F e a i c l t u p r e o v a i d e l a b t e h l a d l 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 r 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 r t e p l 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 l d 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 c g r e i r o e f r a a c l o i h 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 o p w i t r 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 . 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 (s 3 e) n F C a e i l 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 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 l t u p r r e p a a n r d e m a i n t a a i d r e q u C a o n t e i n R l e a n n g e 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 d u 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] Failure to accept or reject a pose of dangerous waste. Immediately [illegible] WAC 173-303-[illegible] [illegible] KPMcNamara [illegible]	Immediately	

Kerry McNamara [illegible] KPMcNamara [illegible] Vancouver [illegible] KPMcNamara's certification [illegible]

I certify [illegible] and [illegible] complete.

Kerry McNamara, President
KPMcNamara

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

May 19, 2008

CERTIFIED MAIL
7008 3500 0001 6954

Mr. Kevin McNamara
KPM McNamara
3917 Hamilton Avenue
Cleveland, OH 44114

RE: Dangerous Waste Inspection, KPM McNamara - Vancouver
200 RC, RCRA ID# WAH000225556

Dear Mr. McNamara:

The Department of Ecology (Ecology) conducted an inspection of KPM McNamara's Vancouver facility on May 7, 2008. The purpose of the inspection was to determine if the facility operated in compliance with Dangerous Waste Regulations (WAC 173-303). Ecology's variations summarized in the attached Compliance Report. The violations observed must be corrected within the time frame indicated in the enclosed resulting in a civil penalty under the Hazardous Waste Act (RCW 70.105 and 080 and 095).

KPM McNamara - Vancouver is a conditionally exempt small quantity generator (CESQG) of dangerous waste. During the inspection, warning information and violations were identified. WAC 173-303-145(2) requires that CESQG's shall not accumulate more than 1000 kg of dangerous waste at any time. Please contact Ecology's Hazardous Waste and Toxics Reduction Program at 360-407-6348 (dewi461@ecy.wa.gov) about the correct quantity limits as well as other requirements. You may wish to have your consultants.

P? J. at -

Dean Nams, Inspector
Hazardous Waste and Toxics Reduction Program
Southwest Regional Office

Enclosure: Compliance Report

cc: Douglas Wise, Vancouver Water Resource Protection
(Douglas.Wise@vancouver.us)
Brenton Greene, Kensington Community Alliance (abtriengtrj1@comcast.n
Erik Kingcreek, Kensington Community Alliance (kingking113@comcast.n

Fac Name: **K P MCNAMARA**	Fac Type: LQG	PAGE 1 of 2
EPA/RCRA ID#: **WAH000022556**	Inspection Date: **05/07/08**	
Site Contact: **Terra Dutch, Operator, [illegible]**	Insp Name(s): **[illegible] Williams, SWRO-HWTR; Doug Weiss, City Water Resources Protection**	
Address: City: Zip: **[illegible] SE Marine Ave., Bldg 5, Ste B, Vancouver WA 98661.**	**X** Full Inspection Targeted Inspection	

Photos taken (circle yes): . **Samples:**

Notes (including sites inspected):

This was a routine, unannounced inspection for compliance with WAC 173-303. We arrived on site at 10:30 am and introduced ourselves to Mr. Dutch. We then walked through the shop and dangerous waste accumulation areas. [illegible] No compliance violations were observed (drums were well-labeled, closed, to meet the WAC 173-303 requirements).

There was a strong (pesticide) odor in the wash area. [illegible] Mr. Dutch said [illegible] the floor and trench.

The south end of the trench was blocked. Mr. Dutch said [illegible] the trench is pumped [illegible] the tanks about twice a day depending on workload. We observed the south end of the trench connected to a pump and the tank. The floor sump is not connected to the tank. However, there was about 1" of liquid in the sump.

Mr. Dutch showed us his Weekly Inspection Log for the dangerous waste area. The last inspection was conducted April 25, 2008. We reviewed the Daily Inspection Log for the tank (marked "dangerous waste") [illegible]. The last inspection was conducted by Mr. Dutch on April 29, 2008.

Mr. Dutch noted that the waste water is managed off-site (out of the tank) by Pacific Power Vac, Portland. He provided documentation including:

- Bill of Lading #15772 for 500 gal of "WA state waste" shipped on January 3, 2008.
- Bill of Lading #17835 for 660 gal of waste "WA Haz, Non-RCRA" shipped February 12, 2008.
- Bill of Lading #19395 for 825 gal of waste "Non-USDOT Regulated" shipped March 27, 2008.
- Bill of Lading #20403 for 700 gal of waste "Non-USDOT Reg" shipped April 18, 2008.

I asked Mr. Dutch why dangerous waste was managed [illegible] state-only waste (WT02). Mr. Dutch said that Pacific Power Vac [illegible].

We reviewed the [illegible] of the waste shipments to Pacific Power Vac. These documents [illegible] (#1068) was established by [illegible] K P McNamara.

W e c o n c l o u d r e s p e c t b i e t o f h s e i t L e a , t i e h r h 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 P d d _ N a t m e a d r a r e s p s r o a b 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 i s a s s e t d e w a t e r a n s c l o i n p l m 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 .

O n M a y 8 2 0 0 1 8 e c e a i m e e n d f a r i E m K i n S g h . e n d i c l a s h e h e d a t l a l w k i e N t h M c N a m a r a a n h d e i n d i c l a " a t e b d e n t r P a S C a t n d P r o w V e a r k n o w W S a s h i n g t o n a r d i s t r h g o e b r l o d u s g e t p i n g g a e c h d l o c u . m t e h m a t e y S h " a l s o d i c l a t a h e t e r e w c u b l e s l e a r n e x t w e e k

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

Waste/Product Observed	Amount	Location	Management
1. " P e p l S M e o t " W	O n e 5 5 D g u m	D a n g e r o u M s a W a a g m e t e d t W A C 7 3 - 3 0 3 S t g e r A a e a r q e u i r e m e n t s .	
2. " P o s e 2 t 0 0 D O W "	O n e . ' g 5 D 5 r - u m	"	"
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 b l 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 b l 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 b l 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 W r a c s u T s a n l k a s b a s l a d g w r 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	

YIASHI ITGION STAI£ D[tT. Of ECOLWI

Washi Sct tDtep a r t o m fi e c o t l H bagzya 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 Ardrderteststp://www.ecv.wa.gov

IZS.JuthRegtOnfafli POBox47775 OlymWpAi9a8504-7 Phon(e3 6400)7-630 FAX(:3 6400)7-6305	DeNorthRveegsitOnfafli 319-06 0AvSE 7B7e5l IWsAv 9 8008-5 4 5 2 0Phon(e4 2654)9-7000 FAX(:4 2654)9-7098	DeEastRegioOnfafli 460N1MonrSote Spokane9 9W2A5 0Phon(e5:0392)9 3400 FAX(:5 0392)9-3529	DeCentral Regiona 1 W West YAvkSitrea0 YakWmA9 8902-3452 0Phon(e5 0 9) 75-24 FAX(:5 0597)5-2809

N'OTTIOCEOMPLY

1. Yomusctomplseitgem,slentchCeomplicaenrcteitfEiccaltveigyh3 1 0 a y s .
2. Are-insmpaypctalatomtyimverciofryreocft,iovnieollations.
3. Formenlforciemcehatdrisnisotrdaatnjslveena lutpti,Se1s0,p0e0r0 a yevriolation.
4. Correcftlinfeonllowiorlgdtoieosumseafnorrea forcaemtevinotnholbtetakegnaitnhsfitscility.
5. Aliosfittetmhsvwtrcehecf ecomplii afrocuendthoemecsluinmsnorfyiolations.

Inspe Tcytpi X CEI DCAV DCDI DFU.I DOther PAGE Compliance Evaluallon hsoecllon Compliance Assistance Visll Case Deve Jopmen t Insoaclion Follow-up Inspeclion _____	
Fac Name s: KPMcNAMARA	Inspe Phone #): DeWill 3 6 0 s 407-6348
Inspe Dcattieo:n 05/07/08	Stat el/DE#P:A WAH0 0 0 2 5 5 6
Inspectors: DeWill SaWhrsO,-HWTR oo·Wuegis Vsanco Wa ter RePsrcoutreccetion	SiPheo#n:e 36,0-695-2450
SiCentaictl,e: Terr Dnuctchopera (0 53 17)7-3088	SiCentea-cmtail:
SiAdedrEsZsyp: 50SEMari AvneBel,c5 8 tBe, Vancouve 8 6 6WA	

Violcbden (WAC173-303);	Writ Stuemmaor Vyiolaatni Cconrsr emteieolnesd
-141(2)	WAC173-303-141 (2) Ap p Fr o ipplrioacedeaunrdestwvlisnendin astated-eosnilgyndathegdwesteout-off-asctialtiety. Observ KPMcNhasmara odsitsaptoestedmalcygerou{sw-awsatsetweate thrcPuagcHPdwVear(CPPVP)ortCraengdKPMcNamamahtalvinedtific (on-tshiPatPeV)abseeanuthobrytihOerdegDcemparotmEenvtiroQmeanltat (DEQ)ccepwtaste. Requ Acte dUbpnosnecefplitestbteegcicomplwyiithmgeroceflosneensdin stanotnedeysigchantgedwraosuttseout-offasitpaeWAC173-303(2-)141 Wheme tuthmeeinncglosed Ceomplipfriacvalfeec,llowing: • Documenftradtthreeercesvatmg PVCaancceptewaste • CopiesfsigaedlatmeadnifficesatcshhipmwvasstemtPPV2008 • Awristuemmalhywastewaspeercitfriecamt PPV

NOTICE COMPLY	PAGE
630(6)	**WAC173-303-2000(4)(b)(6)(3)(F6a)i: Tucron dwuc et kinspecti of dangewaosuse cumulaa teaisd containers.** Observa The awsese: kinspewcatsioonnd uocAtperd 2250,0w8h, imcehaKB McNamsakriapopneede. kinspections. Requ Acte dommsedirae-sweyerkinspecdiangewraosutsoentaine manageamreenStusbracidpyt hienspelcoftgoAppraiMay tdat 2e0)0,8 wheynorue tuheemclOsmpl Cancteificate.
640(6}	**WAC173-303-2000(4)(f)(e)(b)(ncEa 6 4(c)(8)(d)(a)(i)nyspecotfic dangewaosutsaenakssdecondaryainment.** Observa The adsasi: hyspewcatsioonnd uocAtperd 921,0 0w8h, ich means McNamsakriapapteedawsteokinspections. Requ Acte dommsedirae-sdlayinhyspecdiangewraosutsaen&ks manageamreenStusbracidpyt hienspelcoftgoAppraiMay tdat 2e0)0,8 wheynorue tuheemclOsmpl Cancteificate.

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: DeWilliams, HWTR; Douglas Sanco, Waste Reduction Program

Instructions:
1. Violations noted in the checklist must be corrected and explained in the Notice to Comply.
2. Documentation that violations have been corrected must be received within 30 days, through a Certificate.

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

WAC Code	Conditions Examined & Requirements	Facility Status		
173-303-				
-070(8)	Quantity Determination - Generator must determine if it is a large quantity generator, small quantity generator, or conditionally exempt small quantity generator (WAC 173-303-070(8))	D	D	D
-070(7)	All records must be made available upon request for inspections.	D	D	0
-070(8)	Generator must dispose of dangerous waste at a designated facility.	D	D	D
-070(8)	Generator must manage dangerous waste in a way that does not endanger the environment.	D	D	D
-060(5)	If the site has an EPA ID, the generator must have a current EPA ID number (WAC 173-303-060(5))	D	D	D
MQG and RCRA Requirements (Generator Exemption Status)				
-060(1)	Site has an EPA ID number (apply at www.ecy.wa.gov)	O	D	D
-060(2)	Revised EPA ID form must be submitted to reflect any change in company name or address	D	D	D
-060(5)	An Annual Waste Report must be submitted to the department (WAC 173-303-220(1))	D	D	D
210(2)	Copies of the Annual Report must be made available for inspection (WAC 173-303-220(2))	D	D	D
-210(3)	Waste designated dangerous (WAC 173-303-170(2))	D	D	D
-180(1)	Dangerous waste manifest required (WAC 173-303-170(2))	[8]	D	D
-210(1)	Signature on manifest required (WAC 173-303-170(2))	D	D	D
-220(2)	Annual report must be submitted with EPA ID number (WAC 173-303-170(2))	D	D	D
-140(2)	Recordkeeping requirements (WAC 173-303-170(2))	D	D	D
-070(7)	Requirements for determinations.	D	D	D
-170(3)	Treatment must be performed in accordance with the treatment standards.	D	D	D
-300(5)	Requirements for land disposal restrictions (WAC 173-303-140(2))	D	D	D
-170(1)	Waste stored properly.	D	D	D
-070(4)	Waste designation (WAC 173-303-070(4))	D	D	D
-070(6)	Approved EPA ID number required	D	D	D
-142	State EPA ID number required	[8]	D	D
-630(5)	Contain no records and information	D	D	D
-200(1)	Dangerous waste manifest required	D	D	D
-630(3)	Contain new information	D	D	D
-630(5)	Contain petroleum	D	D	D
-630(7)	Contain information	D	D	D
-0132(3)	Solid waste management	D	D	D
-630(6)	Accumulation	[8]	D	[8]
-200(2)	State Accumulation	D	D	D
-200(2)	Accumulation	D	D	D
-630(8)	Contain information	D	D	D
-200(1)	Contain information	D	D	D
-630(4)	Contain information	D	*	D
-630(9)	Incompatible waste	D	D	D
-630(5)	Minimum			D
-202(2)	Disposal			D
-016(5)	Accumulation	D	D	D
-505(2)	Process	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 Values: V = Violation NA = Not Applicable PV = Previous Violation

	WAC Code 173-303	MQG and Requirements	Facility Status V	NA	PV
Personnel Training	-340(2)	Communication of emergency procedures to new employees [Permit Condition II.A.1]	D	D	D
	-340(1)	Emergency procedures revised immediately when required [Permit Condition II.A.1]	D	D	D
	-201(2)	Posting of emergency telephone numbers and location of fire extinguishers and other emergency equipment [Permit Condition II.A.1]	D	D	D
	-201(2)	Designated emergency coordinator with authority to commit resources to carry out contingency plan [Permit Condition II.A.1]	D	D	D
	-220(1)	General inspection requirements [Permit Condition II.A.2.b]	D	D	D
	-220(2)	General inspection schedule [Permit Condition II.A.2.b]	D	D	O
	-320(2)	General inspection schedule [Permit Condition II.A.2.b]	D	D	O
	-320(2)	Tank inspection [Permit Condition II.A.2.b]	D	D	O
	-320(2)	Tank inspection [Permit Condition II.A.2.b]	D	D	D
	-340(4)	Arrangements with local authorities documented [Permit Condition II.A.1]	D	O	D
Waste Analysis	-515	Required for all hazardous waste	D	D	D
	-515(4)	Use of analytical methods specified in SW-846	D	D	D
	-515(5)	Use of analytical methods for ignitable, reactive, and incompatible waste	D	D	D
	-515(6)	Contact with TSD facility to verify waste acceptance [40 CFR 264.12(c)(1)]	D	D	D
	-515(6)	Disposal facility [40 CFR 264.12(d)]	D	D	D
	-515(6)	Contact with receiving facility to verify acceptance	D	O	D
	-515(6)(b)	Waste analysis and analytical methods documented	D	D	D
	-522(2)	Anti-fouling agent [illegible]	D	O	D
Recordkeeping	-120	Recordkeeping requirements	D	D	D
	525(1)	Recordkeeping requirements	D	D	D
	-505(2)	Recordkeeping requirements	D	D	D
	505(2)	Recordkeeping requirements	D	D	D
	525(1)	Recordkeeping requirements of -180	D	D	D
Contingency Plan	-145(2)	Aspects of the environmental protection code immediately	D	D	D
	-145(3)	Aspects of the environmental protection code rolled	D	D	a
Tank Systems	-573(1)(a)	Management practices for tank systems	D	D	D
	-573(1)(a)	Spill prevention practices	D	O	D
	-573(1)(a)	Accumulation of hazardous waste	D	D	O
	-573(1)(a)	Spill prevention practices	O	D	D
	-573(1)(a)	Spill prevention practices	D	D	D
Other	-640(6)	Daily log of operations		D	D
	-640(5)	Tank inspection	D	D	D
	-640(4)	Secondary containment	D	D	[ ]

Facility Liquid Waste 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 in the Notice Comply.
3. Document that the violation has been corrected by Ecology 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 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 training program 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 in [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
.Internet address: http://www.ecy.wa.gov

Southwest Regional Office	Northwest Regional Office	East Regional Office	Central Regional Office
PO Box 47775	3190 - 160 Ave 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 the Compliance Notice, which is not the Notice of Compliance, and include proof of compliance (photo, copies, manifests/disposal, other original or whole or like) appropriate.
You may request extension of the Compliance Notice requirements in the Compliance Notice as a proposed (or) compliance and/or the Compliance Notice to the Ecology Notice will be in accordance with the Notice of Compliance Notice.

Compliance Certification

1. I certify that the violation to the Notice of Compliance is complete and/or the violation has been corrected.
2. I have personally made a thorough document that is not complete and/or the violation has been corrected.
3. I am a watershed manager in the Ecology Notice of Compliance Notice.
4. I declare under the penalty of the Ecology Notice of Compliance Notice that the Ecology Notice of Compliance Notice is correct.

Signature;	Print Name:
Position/Title:	Date:

SUMMARY of Ecology Notice

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 4 2008
Washington State Department of Ecology

·K.P McNamara - Vancouver Dep mt
: · : Poa Hnd Pir eas c t i c e s

J · fo e l p w i n ag p l e r s a c w i i b c e e s l l t o e w r e s d o c o m p l w i a h t h e S t a D e h g e W a o s u R s e g u l a (W A C 1 7 3 , a - t 3 h K e P M c N a m a r a - V . a n c m . r v f a c i l i t y .

WAC1 7 2 - . 3 W a s D e S i - g n a t i o n

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1 1 1 1 P r i t r o d i K s P M c N a m w a i r l a l s a i t a g e h w a i s r t e s k u d t i h g - l i t t e r . c o n t a m i r e a s t i e d d i u i e w g a e n s d t h e s m o a l t i e d r T i h a e w s a e s t e s w i l l n o b t e a d d t e o d m a n a o g f e f d v i s t c h t e s t h o e t d e s

1 1 1 A l d l e s i g i n r a f t o i r o w m i a b l t e l i e o p n r t - a s r i n d t a e d e a v E a c o a u b p g o e n r e q u S e u s p t p . o d r o t c i u m g e (n e , w g a s p o r n o f a i n a d r e a y s n a l g t a t w a i a l a i l s e a v a i A a n b y a e s s . t t e r t e h a i a d s t e t e n t n b i e h n e o d n - d h o a w s i a ' l r l h a a p e o p p r r d a c e m e n d e l a d t v n t a h i v e a s h t a b s e d e s i g a n c a c t o e r d i n g t W A C 1 7 3 - - 3 0) b 3 i - o 1 - 0 a 0 s c s c a l e s i g (n g a e t n i e k o m a o t w O l e d g e)

WAC1 7 3 - 3 0 - S p 6 4 0 a u p

1 1 1 1 S p i a l r l ' s D o r n e b s t h c e n t a a i 1 c e l e r a s n a e s d h - b u s p p p S e p n i t l h l a s t t l a u t - h e e m m l a e n a o l t t h e e n v i r a n i e l e 1 n 1 t m e e d p a a t s e e e q u i i n r e d W A C 1 7 3 0 3 3 - 1 4 5

" . . . . C 1 l 1 e . a d 1 e 1 b u d p s , (w l i d e s t d y u g d i p t e t e s 1 s) c u m u l a t e d s u b s e d q e u s e i n g t a n r a p d t r i o d p i e s r p o s a l

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

WAC1 7 . 3 - . 3 0 S k t 6 a 4 n 0 d a r d s

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

; \ ¥ AC 173 Non3-Op3e-C8p5e0r{ta2(t)dl Eomp T oytAecsc e p t e d)

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■ E m p l o h y a e b e e s t e n a t i o n r e d l e W s A t C A 1 7 3 - 3 0 a 3 n k d n 1 6 w 0 h , i c h t o m e i s r h e t q t u r i r p e l e p - r i t a n c s c i e n p g T a h a e a e l s e e m a t i o n e d s c n s e h e i p r a e c r c b s K P M r c g N a m a p r o a l r i o s t y a t c e c e p t a n c e r e j e c t i o n .

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12-28-07

Kerry McNamara, President Date
KP McNamara

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[1] T h i s c s l h u e d r e b i f c u i n d g e i l s c n , i s d e e c s b , i o c a i n d e d O s d , e 1 . 1 T t h i t e c o , i t v e e i s l u s u a l a e n l a y r k a e a d " p c o i t s h M e a n t " e S 1 a i f a E e l a t S y a e n e a t y d e t s h p e r r c i d b u e c t i a s p e s t h i e r i b l é o i n g i e n c s i e l e b t i i o c c r i i d d e e e , n e t i c c . i d e ,