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.

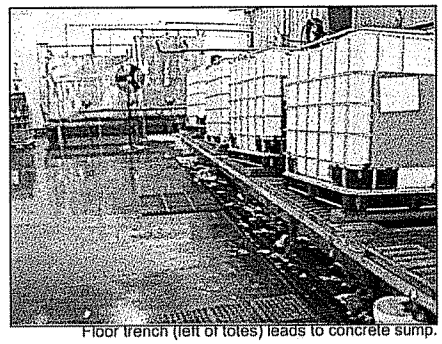
KP cleans, restores and deconstructs 275- to 330-gallon totes. These totes are supposed to arrive 'empty' (as defined in WAC 173-303-040), but may contain a small amount of residual material such as phenol-formaldehyde resins, paints, biocides, and water treatment chemicals. Product residuals are accumulated 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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FINDINGS Ethro Sueghte 2008

OnMay 7, 2008, Ecology youctoinducutreiansmpeackPiDonring thiaitspeEctoiobongsyertvhervdieolaotfihdeasgewaosuseegulations (WAC 173-3T0h3ma)o.ssterivoiuoslwaatasfonollows:

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On June 3, 2008, Ecology met at KP to discuss KP's consultant's ([illegible] Environmental) compliance schedule that was overdue. Ecology informed KP that its shipment of toxic dangerous waste be sent to PPV June 2008. This shipment took place after KP was directed that shipment is not meeting the WAC 173-303-141 requirements.

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

FINDING – October 2008

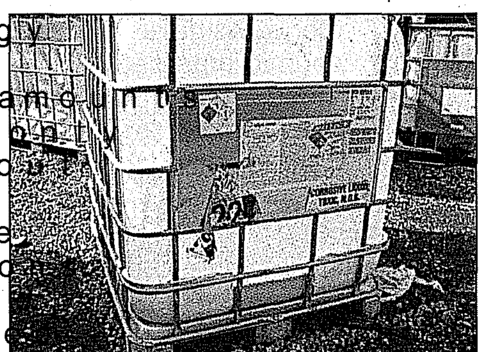
On October 2, 2008, Ecology was contacted by the City of Vancouver about KP's management of mercury-contaminated waste. On October 8, 2008, Ecology conducted an unannounced inspection of KP to follow up on the City's concerns and to determine KP's routine compliance with dangerous waste regulations.

Several violations were observed during the inspection. Appendix 4 provides a copy of the Inspection Report and Notice of Violation prepared following the inspection.

KP had accumulated roughly 210,000-pounds of toxic dangerous waste. Totes were not properly labeled or stored in a way that restricted access for fire equipment. Totes were also stored without secondary containment, and several totes were stored over 90-days.

Totes of state-only toxic dangerous waste.

During the October 8, 2008 inspection, Ecology also observed totes stored outside the building. These totes contained varying amounts of ignitable, hazardous and state-only toxic dangerous waste. They were stored outside without clear identification or containment, without secondary containment (the storage area is permeable gravel). KP's operations manager could not explain the origin of the waste and could not state whether the waste was KP's.


Tote at KP. Labels indicate toxic dangerous waste.

On October 16, 2008, Ecology sent KP a Notice of Violation. On October 17, 2008, Ecology conducted a follow-up inspection at the site. Ecology observed more containers of dangerous waste stored without secondary containment than were observed on October 8, 2008. Ecology wrote and mailed a letter to KP's attention (Appendix 5). This letter directs the company to cease accepting new totes, and address concerns about the totes on-site.

The most serious violations of the Consent Decree are as follows:

- **WAC 173-303-140(1)(a): Failure to properly characterize and test hazardous waste sent to off-site facility.** In approximately 2 instances, the facility failed to properly characterize and test hazardous waste (rinse water and debris) before shipment to an off-site hazardous waste management facility. Failure to properly characterize and test hazardous waste may result in improper transportation, improper identification of hazardous waste, improper treatment, improper disposal, and improper permitting of hazardous waste.

- **WAC 173-303-200(1): Failure to properly accumulate hazardous waste in containers.** Accumulated hazardous waste drums and tanks were not properly labeled, were not properly closed, were not properly dated, were not properly managed, and were not adequate secondary containment.

- **WAC 173-303-280(1): Failure to operate in compliance with standards for operating hazardous waste treatment, storage, and disposal facility.** Accepted hazardous waste from off-site generators in excess of the permitted capacity. Accepted hazardous waste from off-site generators in excess of the permitted capacity. Failure to manage hazardous waste in compliance with the standards for operating a hazardous waste treatment, storage, and disposal facility may result in significant amounts of toxic and hazardous waste being released into the environment. Failure to manage hazardous waste in compliance with the standards for operating a hazardous waste treatment, storage, and disposal facility may result in significant amounts of toxic and hazardous waste being released into the environment. Failure to manage hazardous waste in compliance with the standards for operating a hazardous waste treatment, storage, and disposal facility may result in significant amounts of toxic and hazardous waste being released into the environment.

DISCUSSION:

The Requested Enforcement Action addresses the violations of KPC's hazardous waste management permit (water state-approved hazardous waste treatment permit), and violations of WAC 173-303. The violations represent significant risks to human health and the environment. Table A attached provides a summary of violations and KPC's.

Other Considerations:

A. No concerns have been raised by the Ecology.
B. Economic impact on KPC's consultant indicates that the loss of shipping hazardous waste to Treatment, Storage, and Disposal (TSD) facility will cost $3.00/gal for PetroPlus was about $0.50/gal for KPC's alone. Roughly $50,000 annually to manage wastes through PetroPlus instead of through Chemical.

KPC also would need to buy a new 90-day storage tank, shipping costs through $11,350 to $100,000 to hold the wastes in KPC's, void the costs.

C. Ecology's waste management is in strict compliance with, stakeholder concerns.
D. Work load and [illegible] penalty which could result in additional work load for Ecology's enforcement or Attorney General's staff.
E. Ecology's [illegible] Department of Natural Resources, Department of Commerce, Clark County Health Department, Department of Labor and Industries. These agencies are working closely, coordinating [illegible].
F. There are no allegations of [illegible].

G. History of the facility's recent operation to the extent of illegal disposal regarding Ecology's enforcement compliance.
H. Enthusiasm of Violation WAC 173-303 to be recognized in the past. Violation taken to be recurrent at the same manner.
I. Economic Benefit Below.

The violation of the Kevin Prepress seeing the indication of the violation WAC 173-303 requirement to the case. Kevin also refused to be a Signing Notice Complier. The company has a history of non-compliance to be considered enforcement repeats. The company has repeated its Ecology's admin directives, continuous resistance to WAC 173-303.

RECOMMENDATION - ADMINISTRATIVE ORDER:
To address the violation of the Kevin (and accordance with RCW 70.105.095), recommend Order Direct Kevin to take the action in the Order of Arc. copy of the proposed Order as attached to the Appendix.

RECOMMENDATION - PENALTY:
I recommend Penalty as stated by Kevin as appropriate-only dangerous waste and accept that no tax and ranging was used. Which is the violation of the observation Kevin, WTR believes the violation WAC 173-303-14(12) presents the greater risk to human health and the environment.

The violation of the wrong term is in the Compliance Assurance Policy guide. Dismissed for the reasons of the Kevin's decision to the Ecology's manual. Ecology's manual is in accordance with the recommended penalties consideration.

**Penalty Determination**

| Violations | Category | Option 1 | Option 2 | Option 3 |
|---|---|---|---|---|
| WAC 173-303-14(12) Failure to use appropriate and the shown sending is gated-only dangerous waste to out-of-a-sector facility. | Major | $6,000 | $10,000 | $10,000 |
| WAC 173-303-240 Failure to obtain a permit to meet the requirements operating dangerous waste treatment, storage disposal facility. | Major | $6,000 | $10,000 | $10,000 |
| TOTAL | | $6,000 | $10,000 | $20,000 |

The penalty factors in violation are calculated by the wrong option 1 and the upper range option 2. Option 3 is calculated by applying discretionary factors within the lower and upper range as follows:

| Discretion Factor / Violation | Observation / Evidence | Increase (+), Decrease (-) on Range of Penalty |
|---|---|---|
| Degree of Threat | Dangerous waste was managed off-site | No reduction in penalty is |

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| Human Health and Environment | with a proper shipping paper work, according.<br><br>The transport of EPA Ay. dotinde stated dangerous waste. Tehre. re was no indication that the nuwas certtief ceedpt transpazardous material dangerous waste.<br><br>KPhar does stab thsh three deceiving facilities. Proyual cdcet pwaste. Whi KPhad determinhRPd could accept pwaste by labeman health the enrvdir oantmiesnykt. manatghiewagstther cPuPgWhithout proper surtahtachfeaccidiuitd accept dretahwaste.<br><br>KPaccepteted rehmaezlayrwdaosutse antdoxdiacngewaosuitsteotTehsis. waswtaestooredsaibdoevgeravel drive (wsapycidntwreoriesplace, anndosecondcanrtyaiTimerne). waso reocfoercdeoipprto,per labeling.<br><br>KPisanindustreaitahbeanokfs the CoRiumbiaGraonudnodwater sampwaisgitaifaktedetermined thantin-grsoumwpalseakTimagt. analsyhsoiwsehdalglroowundwater penet (aigeon,undrweastesty fefwebetlthwe suanfdaseill courledanhigyoaftfe-isahtaelow-' sougcreundwater) | consideration discrfeatcitoonr. |
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REFERENCES

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- *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 n t e r*
- *A t t a c h 6 m G e n d f e d K r P .*

**Table A – Violations at KPM**

| Violation | Date Observed |
|---|---|
| **WAC 173-303-070(3): Failure designating wastes.** KPM could not demonstrate that it was able to adequately designate its waste prior to off-site disposal. | August 2007 |
| **WAC 173-303-145: Failure reporting spills or releases.** Spills were observed in and around the pressure filter and in the tank systems. Residual waste also observed on vehicles stored outside. | August 2007 October 2008 |
| **WAC 173-303-170(2) referencing 180(1): Failure to properly prepare the hazardous waste manifest.** Manifest #001692059 did not include transporter name, phone number, EPA identification number. | August 2007 |
| **WAC 173-303-200(1)(b)(i), (WAC 173-303-640(4) and (6)), referencing: Failure to meet the dangerous waste tank storage requirements.** KPM was accumulating rinse waste in in-ground floor sumps, two "rinse tanks", stainless-steel rinse tanks. No certification of the tank system and adequate secondary containment... did not have adequate containment to prevent ... properly protected to prevent releases to the environment. | August 2007 May 2008 |
| **WAC 173-303-200(1)(e) referencing 330: Failure to provide adequate personnel training. Failure to prepare and maintain a written training plan, maintain training records.** Operators interviewed were not able to define the difference between dangerous and non-dangerous wastes and interviewed were not aware of the risks associated with the management of this waste. The staff interviewed was concerned about spills of liquid through accumulation in the in-ground sumps which flow to the ... addressed by Ecology. Workers interviewed did not understand adequately the Dangerous Waste Regulations. | August 2007 |
| **WAC 173-303-200(1)(e) referencing 350: Failure to prepare and maintain an adequate Contingency Plan and emergency procedures.** A Contingency Plan was not prepared by the facility. Operators could not demonstrate familiarity with the facility's processes. | August 2007 |
| **WAC 173-303-141(2): Failure to use appropriate procedures and methods when sending designated dangerous waste to an out-of-state facility.** KPM disposed of their spent state-oxide waste (rinse-water) through Pollution Prevention (PPV) Portland, Oregon. | May 2008 |
| **WAC 173-303-200(1)(b) referencing 320: Failure to conduct weekly inspections of dangerous waste accumulation areas and containers.** KPM skipped several weekly inspections. | May 2008 |
| **WAC 173-303-170(2) referencing 200(1)(d): Failure to label containers "Hazardous Waste" or "Dangerous Waste" and/or failure to provide a label that identifies the major risk.** Totes and drums were not marked dangerous waste and identified of the risk. | August 2007 October 2008 |

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| **WAC 173-303-200(1)(b)(iii) Failure to conduct general fraud initial inspection.** The owner/operator failed to conduct the required general fraud initial inspection at the warehouse. Auditors observed that the warehouse was being used as a storage yard. KDPH indicated that a variance form was not filed for inspection at the yard. | August 2007 October 2008 |
| **WAC 173-303-200(1)(b)(iii) Failure to take appropriate measures to stop the receipt of incompatible waste at a storage/treatment, and disposal facility.** KDPH accepted waste for storage/treatment/disposal. The owner/operator "treated" as defined in WAC 173-303-200(2) waste as dangerous waste treatment and disposal. NOTE: August 2007 October 2008 Ecology is the authority WAC 173-303-395(5) KDPH had not taken appropriate measures to stop the dangerous waste treatment and disposal. | August 2007 October 2008 |
| **WAC 173-303-200(1)(b)(iii) Failure to maintain at the minimum the required separation between incompatible waste containers and accumulation areas, and failure to maintain adequate aisle space for unobstructed movement and emergency response and equipment within the facility.** The owner/operator failed to provide adequate aisle space between containers and equipment within the warehouse. This was observed by the auditors during the site visit. The owner/operator failed to provide adequate aisle space between containers, in violation of the compliance inspection. | October 2008 |
| **WAC 173-303-200(1)(b)(iii) Failure to maintain a 50 foot buffer zone (WAC 173-303-200(1)(a)) around the waste storage area.** The owner/operator failed to maintain a 50-foot buffer zone around the waste storage area. | October 2008 |
| **WAC 173-303-200(1)(b)(iii) Failure to provide adequate secondary containment system.** Over 30,000 gallons of liquid was observed in the storage area. Ecology and KDPH Mr. McNamara warned the owner/operator to provide adequate secondary containment system to contain 110% of the volume of liquid required. | October 2008 |

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

December 3, 2008

**CERTIFIED MAIL**
**7003 6450 0000 6175 3528 4**

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

RE: KP McNamara Corporation, 5805 E Mill Plain Blvd, Vancouver, WA 98661
RCRA ID# WAH000010603

Dear Mr. McNamara:

Enclosed is a 6237 request for information pursuant to the Washington Dangerous Waste Regulations (WAC 173-303-146), and a reissued human health and environmental assessment. Also enclosed is a Notice of Violation, which is being issued to address multiple dangerous waste violations and to initiate the dispute resolution process. Please read the enclosed documents carefully. Failure to comply with the requirements of the enclosed documents may result in enforcement action.

If you wish to form a Joint Technical Committee, please follow the procedures as described in the Notice of Violation and Notice of Penalty. You may request a formal review of the Notice of Violation and Notice of Penalty by filing a Petition for Review with the Pollution Control Hearings Board within 30 days of your receipt of this order/Penalty.

All correspondence and attachments should be directed to Dave Williams, Department of Ecology, Southwest Office, PO Box 47775, Olympia, WA 98504-7775. Please direct any questions concerning the enclosures to Dave Williams at 360/407-6348.

Sincerely,

Kevin Sheehan
Hazardous Waste & Toxics Reduction Program
Southwest Office Regional Manager

Enclosures

cc: Penalty Tracking Officer
Douglas Wise, Vancouver Permits Program
(douglas.wise@ci.vancouver.wa.us)

# STATE OF WASHINGTON
# DEPARTMENT OF ECOLOGY

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

To: Mr. Kevin McNamara
KPM McNamara
397 Hamilton
Cleveland, OH 44114

For hand delivery to:
503 E Main Avenue
Vancouver, WA 98661
RCRA WA# D000010603

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

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

1. **WAC 173-303-141(1)(a): Failure to properly manage dangerous waste when generating dangerous waste from a out-of-state facility.** KPM is a property owner of a property located in Washington. KPM generated dangerous waste from a facility located in Oregon. KPM shipped the dangerous waste off-site without obtaining a dangerous waste permit from EPA/ST or transporting the waste to a permitted facility in compliance with the requirements of the receiving facility's permit or with a dangerous waste permit.

2. **WAC 173-303-200(1): Failure to properly manage dangerous waste in containers.** KPM accumulated dangerous waste in containers in a manner that is not in compliance with the requirements of WAC 173-303-200(1) and WAC 173-303-200(2) in that the containers were not properly labeled and were not closed during storage except when it was necessary to add or remove waste.

3. **WAC 173-303-280(1): Failure to properly manage dangerous waste in a storage facility.** KPM is a storage facility that accepts dangerous waste from off-site sources. Those sources were not

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

**. 5WAC1 7 3 3 0 3 - S p 4 5 a n B i s c h a t r d g h e e a n v i r o n m e n t**

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

**4 .WAC1 7 3 - 3 0 3 a n 7 0 r ( e 2 f ) e r 2 e 0 n 0 ( p 1 a n g e W a u s s M a n a g e m e n t i C o n t a i n e r s**

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

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

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

- W A C 1 7 3 - 3 0 3 - a 2 r 0 b 0 y ( e l f ) e ( l e e 6 r 3 0 0 e ( - 5 K ) 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 .

- W A C 1 7 3 - 3 0 3 - a 2 r 0 b 0 y ( e l f ) e ( r 1 e 6 r 3 0 0 e ( a 5 n ) d ( 7 3 ) - 3 0 3 - 3 4 0 ( 3 ) - S e p a r t a t a e n s d l r s m s t i h a e s r e e 3 S i t n c b é 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 o m o r t e h a w , o : 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 d i 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 d I f c o t w r 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 W A C 1 7 3 - 3 0 3 - a 2 r 0 b 0 y ( e l f ) e ( e e 6 r 3 0 0 e ( C 6 ) n e l w u e c e t k i h 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 i 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 h d d e a s t a : e t d i r o n é 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 d 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 h , d e a t 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 .

- 0 W A C 1 7 3 - 3 0 3 - a 2 r 0 b 0 y ( e l f ) e ( l e e 6 r 3 0 0 e ( - 7 P ) 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 .W A C - 1 7 3 - 3 0 3 - 2 0 W A C 1 ) 7 ( 3 b - ) 3 ( 0 i 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 t 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

- 0 W A C 1 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 .

- W A C 1 7 3 - 3 0 3 - 6 D 4 a 0 n ( g 5 e ) w r ( a d s u ) t s a e r 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 " i g n a b m e l b o 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 l 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 r 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

- a W A C 1 7 3 - 3 0 3 - ) D 4 a 0 ( g 6 w r a ( 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 l e a c p t e 6 y r 4 0 ( ) 6 a ) n ( t h h i e n s p e s c h t o i u o l c h o b c h u e n e w n i t a e h n d i n s p e l c o p t g e 6 o 4 n 0 ( 6 ) ( d ) .

**6 .1 7 3 - 3 0 3 - 2 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 3 0 d r a y o s f e c e i p t 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 n a e f h a e t n t e l y m e r g e e q n u c i y p s n e c u d r e i v t i y c e s a n o d p e r a t i o n e / q s u t i p u n c h n e u t p r t p h e l a v 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
D e c e m3b2e0r0 8
P a g4eo 6

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

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

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

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

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

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

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

- F iy l e a p p e v a l t h P e o l l U t o n d H r e o a l r B o g s w i t h 3 0 d a y s f t h e "d a t o r e f e c e o i f p h f d 'c s c u m E n t l m i e n a g r a b c t p u e a d e 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 c 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 s f t ") d e a o t f e r e c e o i f p h t d 'c 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 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 " 0 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 y f t h d c s c u m e n y f o t a h r a p p e a w l i i y n b g N o t o f c e A p p e a l :
- S e r v e d 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 r p p e i a p l e s t o n : |
|---|---|
| T h e P o l l U t o n d H r e o a l r B o g s d<br>P O B o x 4 0 9 0 3<br>O l y m W A 9 8 5 0 4 - 0 9 0 3 | O R T h e P o l l U t o n d o n o l B H b e a r d i n g s<br>4 2 2 - 4 6 t A h v S E R o w S e i B x l , d 2 g<br>L a c W A 9 8 5 0 3 |

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

**. A n d s e n c o p 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 v . o v*

T o f i h a l w a s a l g e n r c u y l v e i s t h W 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 warranty 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 KMPc Namara | ) ) ) | NOTICE OF PENALTY INCURRED AND DUE No. DE6229 |

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

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

Notiscievtehnat Deepar tonfe Ec (oDleopgayrht maesnste) sapendalty agaiyrosunt haemo uonf$t20 ,f0o0r0 o laCthiaopm7t0eo.rfRCWa5t hsei e. knowsKPMcNamaorcaat5e03 SE Mari Ave #5V,ancoWuAv9e8r661.

Thpeenaiblstayoendhfeo llDewpiagfmendtngs:

- **WAC173-303-F1a4i1 (u2rsae:ptporoppriocteedaundesthods whesnendaisntgated-eosnilgyndangewaosutseoout-of-state faciKIPintyappropdpirsipaotseeldyeipmoesnttastetooxnilcy dangewraosu(tsreinsel-wacleastehsehipmesent-off-site withadangewraosuntsenifewhtasubyadransvpiotrhaeurt EPA/STtraatnesplodenteiNfuimcbaetnwdonthcountfirtmhaltieon recefaciwlagsiptyrmtiatctcedpangewraosutse.**

11 **173-30a3n-d2480F0a:ilu-roebtapaeinnoitcompWliythe requirefmoerpnetrsaatdiamgewaosutseeatsmteonrtaangde dispo(TSSDa)ciKPatcyc.epoteefsromg9enfe-rSaitteers.** totweesmeot"emplyeyliWAC173.303-160(d2n)t,ained ignifamiocuanntgsnieaxbrhnaezlayradnotduosdiangewraosutse. KPoperasaeuchpernidangewraosuttsreeatsmteonratangde dispfoascawlheiratycepthteodtceosntadiannign.gEa;sftfOLis

**Thpeenaiblstuyenplayabbyleewithhin(r3tdya)yosfyourecefptts** Notice.

**Pleasentchpeaymeot**
Depar tonfe Ecotlogy
Cashi Uenriitng
PO Bo4x7611
Olym WpAi9a8504-7611

K P McNamara
Decem3b2e0r08
Page 25

You have the right to submit an Application for Review of Ecology. You have the right to appeal. Appeals are not to be presented to the Pollution Control Board in the first instance but are to be exercised in the following Application for Review of Ecology.

If you fail to timely apply for Review of Ecology within 30 days of your receipt of this notice, Ecology will be provided "Notice of Disposition" on Application for Review. If you fail to timely apply for Review of Ecology, the Ecology Notice of Disposition on Application for Review of Ecology is the Pollution Control Board Hearings

**NOTICE:** If you do not submit an Application for Review of Ecology, the Appeal will be considered as a wilt by the Board and will be subject to a trial or a review.

**To submit an Application for Review of Ecology, Assessment Penalty:** See chapter 43.B2.1 RCW. You Application for Review of Ecology must be submitted to the Department of Ecology within 30 days of the date of receipt of this document.

**To apply for relief you must:**

| | | |
|---|---|---|
| Mail to Application for Review of Ecology | | Deliver your Application for Review of Ecology in person |
| The Department of Ecology<br>Appeals Application for Review of Ecology<br>Coordinator<br>PO Box 47608<br>Olympia, WA 98504-7608 | **OR** | The Department of Ecology<br>Appeals Application for Review of Ecology<br>Coordinator<br>300 Desmond Dr SE<br>Lacey, WA 98503 |

**To Appeal the Notice of Penalty, you must:**

- File your appeal with the Pollution Control Board within 30 days of the "<" of the receipt of this document. Filing a stream is not a bar to the board during a full hearing.
- Serve your appeal to the Department of Ecology within 30 days of the date of receipt of this document. Serve mailing, accompanying the proceedings WAC 371-08-305 (free) and affiant as 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 the delivery of your appeal for remission to the Department of Ecology.

**1 To fyiouappewaitthPolluCtoinothreaIrBrogasrd**

Maaippetal:

ThPolluCtointhreaIrBrogasrd
POBox40903
OlymWpA9a8504-0903

OR

Deliyvoeappeiapleerstoon:

ThPolluCtointhreaIrBrogasrd
422-46htAvSERowe BSlidx2,
LacWeAy98503

**2 ToserywoeuappeoanthDepartomEcnotlogy**

Maaiplpeal.to:

ThDepartomEcnotlogy
Appe&AlpsplicRteiioinef
Coordinator
P0Box47608
OlymWpA9a8504-7608

OR

Deliyvoeappeiapleerstoon:

ThDepartomEcnotlogy
Appe&AlpsplicRteiioinef
Coordinator
300DesmoDnSdE
LacWeAy98503

**3.Andsendcopoyfyouappetaol:**

DeWilliams
DepartomEcnotl'ogy
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Foarditionalv]insfhEnmaitoHmeanrtOnflgWecbesite:
http://www.eho.wa.gov/

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http://wfaA.!gwow./Ceode.Revis□r

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K Seiler

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Sc:iuRegeOnfaIce

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 (Mr. McNamara) are the parties to have received "NOTICE OF PENALTY INCURRED AND DUE," which is that the KPMcNamara and Kerry McNamara have incurred a penalty of $20,000.

I have further concluded that RCW 9.A.72.030 is not a lawful defense to this document which proposes a fact of the assessment of a state tenure by making an order to be made KPMcNamara and Kerry McNamara prepare a certain mitigation of the amount of the penalty of the following reasons:

KPMcNamara
Decem3b2e0r08
Pag5e05

Is we ta h rtah tfeo r e g is ti n ug 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 _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _

Tit-le - - - - - - - - - - - - - - - - -

SUBSCRIABNESDWORNbe f o h r e s d a o y f _ - ' - - - - - - - 2 0 0 _ .

NOTARYPUBLilaCn fdotrhSet aoWeashingto

Mycommisexpoinres: _ - - - - " ' - - - - - - - -

RCW9A.72P.e0r3jiOuthsyee codreg r e e .

(1) Apersigu iolpteyr jiuthsyee codreg r i e f e i th tteomits laead pubsleircvatrhtpilenr f o r m h a i d s c t e y e n c a f k e n s a t a e r f i a a s s t a y t e m e n t , wh i h c e k n o w s e f a l u s n e a e m a t e q u o i a r u e t d h o b r y l i a z w e d

(2) Perjiuthye · s e e c o n d e l a C s f s e l o n y .

[1917s5tx c2 3 6 s0 e 9 A . 7 2 . 0 3 0 ]

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 7770 · Olympia, Washington 98504 · (7 3 6 4 5) 7 · 6 3 0 0

August 2, 2007

**CERTIFIED MAIL**
**7 0 0 7 1 0 0 0 4 2 2 5 0 6 3 7 7**

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

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

Mr. Hughes:

Thank you for your letter on August 1, 2007. On August 1, 2007, you know, is KPMcNamara's Vancouver Terminal Incorporated's complaint with the Dangerous Waste Regulation (WAC 173-303).

While one-sixty-one-, in spread of [illegible] cumulated KPMcNamara's [illegible] determination [illegible] 14, which designates a [illegible] order [illegible] outgoing [illegible] inspection [illegible] concrete sump.

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

**KPMcNamara is at the [illegible] WAC 173-303-200 (WAC (b)(ii) 173-303-[illegible] refer [illegible] following [illegible]:**

1. Immediate [illegible] sump [illegible] system can be [illegible] possible to [illegible] KPMcNamara [illegible] integrity.

2. Within [illegible] dangerous [illegible] drum [illegible] WAC 173-303-[illegible] design [illegible] August 1, 2007 [illegible]

G

3. must be stored in secondary containment) upon completion of this work, contact the blowdown water removed from the system.

4. Within thirty (30) days of receipt of this letter, decontaminate the tank system. Any residue (wash water) generated by decontaminating the tank system must be properly accumulated and designated per WAC 173-303-070. Notify me at least two days prior to starting this work, so I can be present and observe work.

5. Within 30 days of receipt of this letter, evaluate the tank system to determine if hazardous constituents were released to the environment. The evaluation must meet the closure performance standards in WAC 173-303-610(2). Please refer to the enclosed *Guidance for Clean Closure of Dangerous Waste Facilities* (Publication #94-111).

6. Within forty-five (45) days of receipt of this letter, designate the sump-wash and the waste generated by decontaminating the tank system. The designation must meet the requirements of WAC 173-303-070, including evaluation of toxicity and persistence per WAC 173-303-100. **NOTE: Based on Ecology's test, the sump-waste designates as corrosive dangerous waste, or EPA Waste Code D002. Further designation is needed to determine if any other federal or state waste codes apply.**

7. Within sixty (60) days of receipt of this letter, provide a report to Ecology which includes a description of the tank system construction (size/dimension of the system components, piping configuration, and integrity of the tank). Also provide the results of the evaluation of the observed cracks at the 0-1-inch ... in the concrete. This information will be used to determine if hazardous constituents could have been released to groundwater.

8. By November 26, 2007, manifest off-site the sump-waste generated by decontaminating the tank. At a minimum, the sump-waste must be managed as corrosive dangerous waste, EPA Waste Code D002, or as other wa... applicable. Provide a copy of the manifest to Ecology within five (5) days of the date the waste is manifested off-site.

The above tasks must be met within the prescribed timelines to ease their concern about the dangerous waste. Failure to meet these deadlines could result in enforcement action, including a penalty under the Hazardous Waste Management Act (RCW 70.105.080) of up to $10,000 per day per violation.

I have several other concerns about how waste has been managed at McNamara. These issues will be addressed in a Compliance Report that will follow in the near future. Within thirty (30) days, please provide the following which will help complete the report:

- Copies of manifests for dangerous waste and non-hazardous waste that were managed off-site from January 2006 through August 2007.

- Any designation information for the waste that has been managed off-site. Please include copies of any analytical reports or other pertinent information.

- A proficiency is a great summary of the main algebra from the same sheet at the water/sea level, and a calculation of the water-level tolerance of primary and secondary sensitive tainoid, but decisions structure and the basketball fairness, etc.

- As it is shown, the negative volume of the process set a mode can, by a inment bernst, at the lowest, empredsas nogrew, raosutsecumua_rleaandolhienrtegral equipment in the area is sity.

I would like to get the above information to the perceptive form, will be forwarded to your three after the Unit Helex, pebkRMcNamtairnamed baegmieheyting thLearQueanGeinteyr(aLtQoSrt) and dae,friidWeAdC173-303 These requirements are generally in the enclosed *QuiRckferGeunidfeDrangeWaosuse Generatnforsmaltaioanitlabdeucgohlowgybiatlettp://www.ecy.w*

Please contact 360/407-6348461@ecy.wa.gov if you have any questions about three guidance, or subjectedinsmedAicattLieontleorfokrwtaord workwiintgh qyuoiuakdobytehsessoencerns.

Sincerely,

Jft, .Jj□ll□lYlV□\ □

Dean R. Williams, Inspector
Hazardous Waste Toxic Reduction Program
Southwest Regional Office

cc: Doug Wise, Ecology Vancouver Reference Project Program

Enclosures:
Dangerous Waste Regulation (WAC 173-303)
Guidance for Cleanup of Dangerous Waste Facilities
QuiRckferGeunidfeDrangeWaosuse Generators

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

October 2, 2008

**CERTIFIED**
**7008 3400 0017 5352 6**

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

RE: **Immediate Required Action** – KPM McNamara, 5038 Maritime Blvd, Vancouver, WA 98661, RCRA ID# WAH000022556

Dear Mr. McNamara:

As you know, the Department of Ecology (Ecology) has been in regular contact with KPM McNamara's Vancouver facility since October 2, 2007. At that time, Ecology's review of all of the Standards and Regulations (WAC 173-303) inspection reports and notice of Violation was sent to you on October 2, 2008.

A follow-up review was conducted on October 2, 2008 (see enclosed 17 October 2008 Inspection Report). Terrance Dutchman, Hazardous Waste and Toxics Reduction Program, Ecology observed no attempts to comply with the Ecology observed no attempts to comply with the Ecology observed no attempts to comply with the October 2, 2008 inspection.

Ecology has not authorized the disposal of hazardous waste at KPM McNamara. Several roll-off containers containing hazardous waste were observed to contain extremely large quantities of waste, appearing to contain contaminated debris, and were observed to be in poor condition, posing a risk of release to the environment.

**KPM McNamara has not treated, stored, or disposed of dangerous waste at its facility without a permit or interim status, and is in violation of WAC 173-303-160 and WAC 173-303-950 by operating a TSD without obtaining a permit or interim status. Failure to comply with the following requirements constitutes a violation of the dangerous waste regulations:**

1. immediately cease all acceptance of dangerous waste and "attempt to delist" as required by WAC 173-303-160.

2. Within 90 days of receipt of this letter, attempt to delist the dangerous waste, or determine whether contaminated soil from the alleged dangerous waste must be moved and remediated in accordance with WAC 173-303-160. Dangerous waste must be kept to a minimum. "Waste" means discarded material (WAC 173-303-016). "Waste" means any material that is abandoned, recycled, or considered inherently waste-like. Waste includes, but is not limited to, spent materials, sludges, toxic, corrosive, ignitable, or reactive materials. Whether the dangerous waste is a hazardous waste, or a "non-hazardous" dangerous waste, must be determined by analyzing the waste and documenting the results in accordance with WAC 173-303-070.

3. Within thirty days of receipt of this letter, return non-empty totes to the generator or designate a facility to properly manage these wastes. If Dean's wastes is due to be taken together, the wastes must be managed through a permitted TSD facility. Within 30 days of receipt of this letter, provide a copy of the bill of lading for non-empty totes returned to the generator, provide a copy of manifests showing that the wastes have been disposed through a permitted TSD facility.

KPM McNamara has repeatedly violated WAC 173-303. Ecology has repeatedly expressed concern about KPM McNamara's practices. At this time, Ecology is considering formal enforcement under the Hazardous Waste Management Act (RCW 70.105.080) that could result in formal enforcement and penalty of up to $10,000 per day per violation.

Contact me at (360) 407-6348 or dwil461@ecy.wa.gov if you have questions or require technical assistance with your consultants.

Sincerely,

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

Enclosure: Compliance Report

cc: Brent Jorgensen, Environmental Consultant (bjorgensen@comcast.net)
Douglas Wiese, Water Resources Program (douglas.wiese@wa.gov)
Kerry McNamara, KPM (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) 677-1300 | Inspector Name(s): Will Stevens, HWTR Doug Gies, Water Resources Protection |
| Address: 50 SE Main Avenue, Bellevue, WA 98661 | Focused Compliance Inspection |

Photo taken (on image): Sample no:

Notes (including observations):

Ic o n t a B c r t e l m o t r g e o n f s o C h r e e k s i d e ( K P M c N a m a r a c o r p o r a t e s s u t t a d l i a s n d E u c s o s l o g y ' l e t a t n d l o t o V e o l a N O V o o n d a T h e e t t e w r a / s N e O t V K P M c N a m a r O a t o 1 b 6 2 , 0 0 8 , a n w l a s r : h G r i d e e k E s n i v d i e r o r a n M e c r N t a a m l a a r g a e ' n s t .

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

I s p o w k i e F t h a D n i k o l k h C e i d t W a n c o l u n v d e u r W a s t e a P a r b e g a r h a o n u t W C a u s a h l e i n d i c t l a C a u e a d W a a s w h o u p l r d o b r a e d e t d g e a f p e r m m o i d i f i t o a n t s n i t e a w l q l u i p o n t e o n t , a c c e p n e e w a s s t t e r e T a h m p t e r m i p t r t o i c c e g s u s l a d k p t e i m x o n t h s .

I r e l a t y h e i d s f o r m B a r t e J r o t n r g e h l s s o a n h . e u n d e r s a h a b s l c a r t i h f a h t t e o t q e f s e s i d u h a n d l o y t e b t e e s r h i p o p f s e f i d f t r e k K P M c N a m a l t r a M . r d J . o r g e t n h s D a c t n W g i s ( e W a R e s o u r c e P r o t e P c r t o i ' o g n n a l m w y o v u i s t d s e i l t a e f t e h n d e a . y .

D o u W g i s a e n b a r r i v e d a 9 o r 4 - 5 r a s n i d t h e r o d u c e t d M r D u u r t s c e h W e w a l k e d t h r t h f e a c a i r l d t o y b s l e f e o v l e l d o w ! n g :

OUTSIDE STORAGE

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

- S e v e e r m a p l t t o y t p e r s e , v . c i o o n u t s a d i s y n t i y m g e r n e a s t i e n d , e d e n e l i W e e n e o d a e s d t r o n g s t y r o e d n o e e a h t e o t M e r s D . ; u t c h s m a a f n d t e o t h e a s d e c e a n r t r l a y n l e e d c o u n l o d t u t t h e u n p b e c a t u h s e e n y e l b l a e d d .

- T h e i o n - t e o m t p e t s y e o n e O c 8 2 0 0 e v 8 e r s e t o i n s i l T h e t s e t w e e s r f e o u t n o d o n t a i n e x t r e h n a e z l a y r o d s o t u a s t e t - o o d n a l c n y g e w r a o s u T s e h e w r e e r s e e v e n e a v b n - e t m o p t t e y s - s i T h e t s e t ( e l s a b a e s t l o e x P i e c p , s l a e n t b l ' a ) s o n t a a s i n g d i a f n i o c u a n f n t e t s i ( d u t p e - i n c h A e t l s e ) a t s v d o f h t e o t w e e s r o p e ( r p e r h d a p s i a l i d i n t y a o t f e l g r e e s i T h e w r a e s s t r n o a t g h a l e d e i n h a e r k e A a l n l o n - e t m o p t w e y s m e a r k a e s n d o t i e T n d a b A l . e

- K e r M r c y N a m a c o r p o r a t e M r D . u e t d c h w r h a i w l e v e e r c e o n d u o c u t i r i n n s g p e M d t D i u o t n c . h t m o M n c . M c N a m t a h r t a c t d w a a y s i l s a d s a t y t . h e s p o w k i e M h M . c N a m a r r e a x p r e E s c s o e l d o c g p y n ' c s e r a b o n u o t n - e t m o p t t e y s x p l a t h t a l t e t s o e t e s n o b t e r u e l m d o f v e d r n s e i w t i e t l p o r o p e r d e s i g n M a r M . c N a m s a r h a e u n d e r s t o o d .

- 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 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 l m a i e a a k r 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 c n r g e w r a o s u . t s e t r e a t s m t e o n r a t a n , g d l e i s p f o a s c a i l p l c i i t m y t o e n d e f h e c t P e t p e t s h i c a t c t n t a a i b r o s u i d t x i n c b o é e s i b s u a e i b l t e o c t c e n t a a w i a e t d h e i a s t o x a i n d c h t e o r t e e e d t e b d e m p t l y . o f f e r t h t a h t t e o r t e e e d t e o c b n t o a n D r y 3 o % f t c h a e p a ( c t i h t a y b . o 1 u g t a l o l v f o a n s t N e O ) T . E D : n i e n c h o f e s i i d a 0 3 0 - g t a o l 1 t l 3 c o q r a l a d 5 s . t g 6 a l l o n s .

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

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

- T h e w r e e r s e e v e e m a p t t o y t i e n s s t i h d w e a r e h a n r s l e e u , g 3 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 c 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 c p 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 m 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 c 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 c d e l o b e s v e a r l u a t a i p o p m e a t o e n d e y c . o n h a a i z r a r m d a o t u e s r l t a h e t d m a r t k h n e o n - e t m o p t t e y s a c t n t a n i o m e - c h a z c a h r e c m o . u i s c a ( f e o x r a m p l h e o n E ⊡ 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 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 r t t h w e a s i t r t . h e e n t e c e t d e s t o b e d e s i g n l a f h d e e d s . i g s a l a d w s e i n i t t s h a a z t a r t d l o e u h s e e n t t i o w t e i e r t e a s i n d e u e d b s e s h i p t p a e T c S T c p r r o c e ( s b s u i l a k g n i d n i g s p o s a l ) .

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

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

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

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

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

TAOEWASHINGTON
DEPARTOMEENCTOLOGY
POBo4x7 7 7 5 l y m pWa s h i n 9 8 5 0 4 -°7 (3 6 4 0)7 - 6 3 0 0

O c t o1b6 2,0 0 8

**C E R T I M A E D**
**.7 0 0364 5000 0617 5352 5 3**

M r K e r M r c y N a m a r a
K P M c N a m a r a
3 9 7 H 2 a m i A v e n u e
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 c 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 t (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 e u t e n l e r o c f u r y - w a r s t a e t i e n v i a n g t u h a f e t a e c i l i t y ' s c o m p l w i a t h h S e t a t e ' s W a s R g e e g r u o l u a s W A C 7 3 - 3 0 3 ) .

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

- **W A C 1 7 3 - 3 0 3 2 - 0 a O n , 0 1 6 3 F O a : i l t u p r r e o p r e a r n 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 c u a m n 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 . 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 D i u r a e v a p e r m t e a t c c e t p r t o , a d t i s p o o f s a n g e r o u s w a s t** S e e . v e t r o a b l e f s i q w u e i r o d b s e o v 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 a c c e p t e o n f f - s i t e T h e w y e e m 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 o m s s i s l e e m i e a d o l o s s o t e c o r r e v i t t 3 e 0 d a y a s s p , r e s c i r t h i h b e e d I n s p e R c e t p i o P r n t e . a e e m p a e n d e e t t u h C e r o m p l C a e m r d e a f n i d e a q t u e e s t e d i n f o r m a a d t i r c e i n c t h B e e d p o F r a t i t o a e q u a i c r t e i d o m 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 m 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 waste is not the only reducing inspection. However, the area requests to find a mutually consistent time to be effective in the initial yielded with our response to compliance. Please also contact the same problem to obtain the enough easy analysis.

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

Sincerely,

Dean Rams, Inspector
Hazardous Waste Toxics Reduction Program
Southwest Office

cc: Brent Jorge, Cnrse Eenkes, Sivile Connes (tbarlemg_ri1@comcast.net)
Douglas Wise, Vancouver Reserve Project Engineer (Douglas.Wise@ci.vanc

Enclosure: Compliance Report, Notification Complaint, Complaint Certificate

| | |
|---|---|
| Facility Name: KPMC NAMARA | Facility Type: PAGE 1 of |
| EPA RCRA ID #: WAH000025256 | Inspection Date: 10/08/08 |
| Site Contact: Terra Induction Corporation (953) 777-3000 | Inspector(s): Will Sarkis, HWTR<br>Douglas Ceiling, Water Resources Protection<br>Nollan Sarkis, HWTR |
| Address: 503 MLK Ave, Bellingham, WA 98661<br>City: Zip: | X Full Inspection Targeted Inspection<br>ERT#S608877 |

Photo taken (explain): Sample no:

Note (include violations observed):

This was an announced compliance inspection at Terra Induction McNamara. Inspectors were there at the request of the facility to determine compliance with Dangerous Waste Regulations.

Doug Ceiling, Nollan Sarkis and Will Sarkis met with Mr. Dutchman. The walk-through of the facility included the following:

- The warehouse is in the process of being remodeled. Workers were observed installing drywall and painting. Mr. Dutchman said the facility is expected to open in January 2009. Mr. Dutchman said the facility originally applied for a formal determination that the facility was not a dangerous waste generator.

- The warehouse contains a variety of equipment, including a forklift, a grinder, a table saw, and a welder. Mr. Dutchman said the facility will start with a few employees but will eventually have 30 employees. Mr. Dutchman said the facility could not provide a floor plan at this time.

- Weld beads were observed on the floor. Mr. Dutchman said the welding was done by a contractor. Mr. Dutchman said the facility does not plan to do welding. Mr. Dutchman said the facility would provide a floor plan within 30 days.

- All of the wastes generated by the facility will be collected by Mr. Dutchman and taken to his residence for disposal. Mr. Dutchman said the facility would provide a list of the wastes within 30 days.

- There are no floor drains in the building. Mr. Dutchman said the facility would provide a floor plan within 30 days.

- The wastewater from the facility will be discharged to the sanitary sewer. Mr. Dutchman said the facility would provide a floor plan within 30 days.

- The warehouse was recently purchased by Mr. Dutchman. Mr. Dutchman said the facility would provide a floor plan within 30 days.

- The facility was not operating at the time of the inspection. Mr. Dutchman said the facility would provide a floor plan within 30 days.

- The warehouse was recently purchased by Mr. Dutchman. Mr. Dutchman said the facility would provide a floor plan within 30 days.

- I asked Mr. Dutch about his shipment of waste that contained mercury, xylene and benzene. He said that he was [illegible] about the entire content [illegible]. I asked for a copy of the manifest. Mr. Dutch said that he had discussed the waste disposal [illegible]. I asked Mr. Dutch about the source of xylene and benzene. He said he didn't know. He also said he didn't know what it was.

- Mr. Dutch called Mr. Bill Reed, Jorgensen Conforce Environmental, for further information about the mercury contamination. Mr. Jorgensen indicated that the mercury might have come from Pac Power (PPV), whose equipment contained mercury. The waste went to KPM McNamara and [illegible] KPM McNamara's accumulation. On September 30, 2008 the waste was manifested to MRPS of Portage (Manifest #005214172 JJK). The waste was profiled containing mercury at MRP by the [illegible].

- Mr. Jorgensen told KPM McNamara that he [illegible] the mercury [illegible] suspected that the mercury was already in the tank at KPM McNamara. The transporter, NRG Environmental Services, had taken a sample of the waste [illegible] PPV [illegible] KPM McNamara [illegible] sample of the waste from PPV, [illegible] McNamara assumed responsibility for the [illegible] Quigg Wash.

- Mr. Dutch provided me with the manifests regarding the waste shipments in 2008. These included:
  - Manifest #004050385 JJK of non-RCRA (Profile #33742-08) - site August 2008. The manifest indicated that the waste was "water-only" dangerous waste.
  - Manifest #005214172 JJK of 4600 gallons of waste to MRP Services September 30, 2008.

- Mr. Dutch did not know whether the shipment of waste was [illegible]. Kerry McNamara handles these arrangements.

- We walked around and observed the empty tote [illegible]. We observed [illegible] "Hazardous Waste" [illegible] (WAC 173-303) [illegible] "Dangerous Waste" (WAC 173-303) [illegible] "Dangerous Waste" (WT02):

We concluded our inspection with Mr. Dutch in his office at 2:15 pm.

**POST INSPECTION**

On October 10, 2008 I received an email from Bill Reed, Jorgensen Conforce Environmental, who indicated that analysis results of the waste at MRP Services showed non-detect concentrations of mercury.

On October 13, 2008 I contacted Bill Reed, Jorgensen Conforce Environmental, who sent the following:

- Manifest #004050385 JJK of non-RCRA (Profile #33742-08) site August 2008. Mr. Jorgensen said that the waste [illegible] should have been profiled and designated as dangerous.

- Another shipment will be picked up at KPM McNamara on October 15, 2008. This shipment will be manifested as dangerous waste. (It was [illegible] scheduled [illegible] "before the end of the month").

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 mw ea rs tt se d/ a s pe dMs rDa ul t. c hhmaasn i . n d t b la e v e r d i m p a t k t e h e a s r e r a n g e a m e i n s s w e i a l d l M o r M . c N a m t a c r a h a t h d s e a s p e c t a c o p l e i r t a y K t P i w o s 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 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 c h i s d o k t n o w h r y o n - R e C r R p A t t o y t e s t w e o u s l i d t l e x . p l a t h M a e D d u t c h m a l s o n d o k t n o w h e t n h a y r o w e d y h w y r i e h y e a r d .

I r e q u e a s r M S e D d S o t r h H e B F u l t l o e t t r e y a v t a s u o n n d - s H i B t e F . u i o h w a t r h M e S D d S a t 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 t 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 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 t 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 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 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 Liquid 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 I r S . u t c h s m a a n i d t h w e a s l t o e o k l e d t e a . n s d o a b l e e o m - s i f t o s r o m t e i m e . |
| 4. Unknown Liquid (Busan) | O n 3 0 - g t a o l t H e 2 0 , 5 F % u l | O u t s i i T d o e t e S t o r Y a a g r e d | C l o s a e n d l g o o c d o n d i D t e i n o s y n e . l l o w l i q l u a i b l e " I B e u d s 1 a 0 n 0 9 W B " , " T r i R i n a e " d C o r r T o o s x i v e " . |
| 5. Unknown Liquid (H Buller) | T w 3 3 0 - g t a o l t O e o s e . : : 2 5 f u s l e l c ; c o n t a i n e d 0 % | O u t s i i T d o e t e S t o r Y a a g r e d | C l o s a _ n e d l g o o c d o n d i G t r i e o e n n . - i s h l i q l u a i b l e " I H e B d u l l e r W B 3 7 0 6 R B M r D . t . l t o c h u m l a d f t i M S I D S o r m a t e S e p a l o s p t - i m o s t . e 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 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 | 319-16 Ave SE | 460 N Monroe | 15 West Yakima Ave |
| Olympia WA 98504-7 | Bellevue WA 98008-5452 | Spokane WA 99205 | Yakima WA 98902-3450 |
| Phone (36400)7-6300 | Phone (42654)9-7000 | Phone (50392)9-3400 | Phone (50597)5-2490 |
| FAX (36400)7-6305 | FAX (42654)9-7098 | FAX (50392)9-3529 | FAX (50597)5-2809 |

# 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 Compliance requirements in the Notice of Compliance and Inspection Report (and/or Notice of Compliance) and/or Notice of Compliance Certificate to be completed and/or to be completed by the Ecology Compliance Certificate. Ecology will not be responsible for any loss or damage to the Ecology Compliance Certificate or any loss or damage to the Ecology Compliance Certificate or any loss or damage to the Ecology Compliance Certificate.

## Compliance Certification

1. I certify that the Notice of Compliance and Inspection Report has been corrected.
2. I have personally reviewed the Notice of Compliance and Inspection Report and the Ecology Compliance Certificate and the Ecology Compliance Certificate is complete.
3. I am a water treatment assignment of the Ecology Compliance Certificate and the Ecology Compliance Certificate is complete.
4. I declare that the Ecology Compliance Certificate is correct.

| Signature: | Print Name: |
|---|---|
| Position/Title: | Date: |

## Checked Evidence Submitted

| Violation Code | Check Evidence Submitted | Check Evidence Submitted | Check Evidence Submitted |
|---|---|---|---|
| | | | |
| -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:
**Dee Williams, Northwest Regional Office - HWTR**
**Douglas Yeager, Solid Waste & Resource Protection Program**

Instructions:
1. Violations identified on this checklist must be corrected and the facility must be made to comply.
2. Document in writing the actions taken to correct violations and submit a Certification 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 chapter 173-303 WAC. | D | D | D |
| -070(7)(a) | Records of all waste determinations. | D | D | D |
| -070(8)(b) | SQG waste is properly designated. | D | D | D |
| -070(8)(b)(i) | SQG exemption requirements are met and documented. | D | D | D |
| -060(5) | Identification number from EPA. | D | D | D |
| -060(1) | Site has EPA ID number (apply at www.ecy.wa.gov). | D | D | D |
| -060(2) | Revised ID number submitted to reflect change in company name or address. | D | D | D |
| -060(5) | Annual or biennial hazardous waste report submitted [WAC 173-303-220(1)]. | D | D | D |
| 210(2) | Copies of Annual Reports and exception reports available for review [WAC 173-303-220.1]. | D | D | D |
| 210(3) | Waste designation records available [WAC 173-303-170(2)]. | D | D | D |
| -180(1) | Owner/operator certification [WAC 173-303-170(2)]. | D | D | D |
| -210(1) | Signature of generator [WAC 173-303-180(3)]. | D | D | D |
| -220(2) | Annual exception report with 45 days of end of calendar year [WAC 173-303-170(2)]. | D | D | D |
| -140(2) | Records of hazardous waste activity [40 CFR 262.40]. | D | D | D |
| -010(7)(a) | Records of all waste determinations. | D | D | D |
| -170(3)(b) | Treatment of waste prior to land disposal. | D | D | D |
| -300(5) | R13 Waste Pile Systems [WAC 173-303-400(32)(a)(i)(A)]. | D | D | D |
| -170(1)(a) | Waste properly designated. | D | D | D |
| -070(4) | Waste designation [WAC 173-303-170(1)]. | D | D | D |
| -070(6) | Application of designation to waste [WAC 173-303-170(1)]. | D | D | D |
| -141(2) | State D-Code [WAC 173-303-141(2)]. | D | D | D |
| -630(5)(a) | Containing records [WAC 173-303-630(1)(b)]. | D | D | D |
| -200(1)(d) | Labeling Hazardous Waste [WAC 173-303-170(2)]. | fgl | D | fgl |
| -630(3) | Containing records [WAC 173-303-630(1)(b)]. | D | D | D |
| -630(5)(a) | Containing records [WAC 173-303-630(1)(b)]. | D | D | D |
| -630(7) | Containing records [WAC 173-303-630(1)(b)]. | fgl | D | D |
| -082(3) | Solid waste management [WAC 173-303-017(3)(a)(ii)]. | D | D | D |
| -630(6) | Accumulation [WAC 173-303-630(1)]. | D | D | D |
| -200(2)(a) | Satellite Accumulation [WAC 173-303-170(2)]. | D | D | D |
| -200(2)(b) | Accumulation [WAC 173-303-170(2)]. | D | D | D |
| -630(8)(b) | Containing records [WAC 173-303-630(1)(b)]. | D | D | D |
| -200(1)(c) | Containing records [WAC 173-303-170(2)]. | fgl | D | fgl |
| -630(4) | Containing records [WAC 173-303-630(1)(b)]. | D | D | D |
| -630(9) | Incompatible waste [WAC 173-303-630(1)]. | D | D | D |
| -630(5)(d) | Minimum storage [WAC 173-303-630(1)]. | fgl | D | D |
| -201(2)(a) | Disposal [WAC 173-303-170(3)]. | D | D | D |
| -016(5)(d) | Notification [WAC 173-303-170(3)]. | D | D | D |
| -505(2)(d) | Land disposal restrictions. | D | D | D |
| -802 | Compliance with Federal 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 requirements [rule by 200(1)(e)] | D | D | D |
| 173-303-340(1) | Emergency provisions [rule by 200(1)(e)] | D | D | D |
| 173-303-200(1)(c) | Post-closure plan [rule by 200(1)(e)] | D | D | D |
| 173-303-200(1)(c) | Designation of emergency coordinator [rule by 200(1)(e)] | D | D | D |
| 173-303-320(1) | General facility standards [rule by 200(1)(e)] | IZJ | D | IZJ |
| 173-303-320(2) | General facility standards [rule by 200(1)(e)] | D | D | D |
| 173-303-320(2) | General facility standards [rule by 200(1)(e)] | D | D | D |
| 173-303-320(2) | General facility standards [rule by 200(1)(e)] | D | D | D |
| 173-303-320(2) | General facility standards [rule by 200(1)(e)] | D | D | D |
| 173-303-340(4) | Arrangements with local authorities [rule by 200(1)(e)] | D | D | D |
| 173-303-515 | Requirements for hazardous waste energy recovery | D | D | D |
| 173-303-515(4) | Use and management of incompatible wastes | D | D | D |
| 173-303-515(5) | Use and management of dangerous waste | D | D | D |
| 173-303-515(6) | Contained in a manner that is not liquid [rule by 40 CFR Part 279.22(c)] | D | D | D |
| 173-303-515(6) | Disposal of used oil [rule by 40 CFR Part 279.22(d)] | D | D | D |
| 173-303-515(6) | Contained in containers or tanks | D | D | D |
| 173-303-515(6) | Used oil management in a manner that prevents releases to the environment | D | D | D |
| 173-303-515(2) | Anti-freeze containing ethylene glycol (compact disc, motor oil, engine coolant, transmission fluid) | D | D | D |
| 173-303-120 | Recycling/reuse facility | D | D | D |
| 173-303-525(1) | Requirements for recyclable materials | D | D | D |
| 173-303-505(2) | Recycling in a manner that is not consistent with the specified manner | D | D | D |
| 173-303-505(2) | Applicability of the DW rules | D | D | D |
| 173-303-525(1) | Prohibited management of recyclable materials | D | D | D |
| 173-303-145(2) | Aspects of the environment to be corrected immediately | D | D | D |
| 173-303-145(3) | Aspects of the environment to be controlled | IZJ | D | IZJ |
| 173-303-573(1) | Management of the environment | D | D | D |
| 173-303-573(1) | Management of the environment | D | D | D |
| 173-303-573(1) | Management of the environment | D | D | D |
| 173-303-573(1) | Management of the environment | D | D | D |
| 173-303-573(1) | Management of the environment | D | D | D |
| 173-303-640(6) | Daily inspection of the facility | D | D | D |
| 173-303-640(5) | Tank system requirements | D | D | D |
| 173-303-640(4) | Secondary containment requirements | D | D | D |

Facility Status Evaluation Key: D = YES

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. Violations identified as a result of the Checklist Comply.
3. Document that the violation has been corrected by Ecology 30 days, 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] | [illegible] | DWac!; unous liat[illegible] 90 days. | 181 | D | D |
| [illegible] | -330 | The training requirement [illegible] 200(1)(e)] | D | D | D |
| [illegible] | -330(1) | A program [illegible] 200(1)(e)] | D | D | D |
| [illegible] | -330(2) | A DW training [illegible] 200(1)(e)] Was the [illegible] Yes? No 181 | D | D | D |
| [illegible] | -339(2) | A written [illegible] 200(1)(e)] | D | D | D |
| [illegible] | -330(3) | Personnel [illegible] 200(1)(e)] | q | D | D |
| [illegible] | -350(2) | A contingency [illegible] 200(1)(e)] | D | D | D |
| [illegible] | -350(3) | Contingency [illegible] 200(1)(e)] [illegible] Yes? No 181 | D | D | D |

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

WASHINGTON STATE DEPARTMENT OF ECOLOGY

Washington State Department of Ecology Hazardous Waste & Toxics Reduction Program

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

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

# NOTICE TO COMPLY

1. You must comply with items listed and send Ecology a certification within 30 days.
2. A re-inspection may occur at any time to verify correction of violations.
3. Formal enforcement [illegible] up to $10,000 per day per violation.
4. Correct the following violations [illegible] against this facility.

| | |
|---|---|
| Inspection Type: X CEI (Compliance Evaluation Inspection) ☐ CAV (Compliance Assistance Visit) ☐ CDI (Case Development Inspection) ☐ FUI (Follow-up Inspection) ☐ Other ________ | PAGE 1 |
| Facility Name: **KP McNAMARA** | Inspector (Phone #): Dee Williams 360-407-6348 |
| Inspection Date: **05/07/08** | Inspector Signature: |
| Other Inspectors: **Nolan Satterthwaite, SWRO-HWTR; Doug Weis, Vancouver Water Resources Protection** | State/EPA ID#: **WAH000022556** |
| Site Contact/Title: **Terry Dutcher, Manufacturing Operator; Site 360-695-2451 Cell 501-377-3088** | Other Contacts: **Kerry McNamara, Owner 216-361-895...; Brent Jorgensen, Creek Environment... 503-692-8118** |
| Site Address/Zip: **50 SE Marine Ave, Bldg 5, Ste B, Vancouver WA 98661** | |

| Violation Code (WAC 173-303): | Written Summary of Violations and Corrective Measures Required |
|---|---|
| -340(3) -630(5)(c) | **WAC 173-303-200(1)(e)(i) by reference -340(3), -630(5)(c): Maintain adequate aisle space. Maintain a minimum of thirty inches of aisle space between rows of containers of accumulated dangerous waste. Maintain adequate aisle space to allow unobstructed movement of emergency personnel and equipment in the facility.**<br><br>Observation: There were ninety-two totes located along the wall of the warehouse. The totes were stored together so that there was no aisle space between them, limiting access for complete inspection.<br><br>Required Action: Upon receipt of this letter, separate the totes to ensure at least 30 inches of aisle space between rows so that all containers can be inspected, and allow unobstructed movement of emergency personnel and equipment in case of emergency. When you return the enclosed **Compliance** [illegible], include photographs showing the aisle space between the containers. |

| | |
|---|---|
| -1730 | **WAC173-303-200(1)(e)(iii) and 40 CFR 264.15(b)(4): Failure to inspect containment system within 90 days.**<br><br>Observation: Attleboro Distribution Center was a treatment facility (as defined in WAC 173-303-200(1)(e)(iii)) where hazardous waste was stored in containment systems. The containment systems were marked with hard-to-read labels and were observed to have been not inspected for 11 to 20 days. Several other containment systems have been observed to be in compliance with the 90-day requirement.<br><br>Required Action: Upon receipt of this notice, the company must review its inspection schedule and procedures to ensure that containment systems are inspected within the required 90-day period. The company must provide a copy of the revised schedule and procedures to the Ecology Agency within 30 days of receipt of this notice. Failure to comply with the requirements of this notice may result in enforcement action. Please see the attached Compliance Certification for specific provisions and instructions. |
| -1720 | **WAC173-303-200(1)(e)(iii) and 40 CFR 264.15(b)(4): Failure to inspect containment system within "Hazardous Waste" Danger Waste" and/or "Hazardous Waste" identification signs.**<br><br>Observation: Two containment areas marked as "Danger Waste" and/or "Hazardous Waste" identification signs were observed to have been not inspected for 11 to 20 days. Several other containment systems have been observed to be in compliance with the 90-day requirement. Two containment areas were observed to have been not inspected for 11 to 20 days. Several other containment systems have been observed to be in compliance with the 90-day requirement.<br><br>Required Action: Upon receipt of this notice, the company must review its inspection schedule and procedures to ensure that containment systems are inspected within the required 90-day period. The company must provide a copy of the revised schedule and procedures to the Ecology Agency within 30 days of receipt of this notice. Failure to comply with the requirements of this notice may result in enforcement action. Please see the attached Compliance Certification for specific provisions and instructions. |
| -6730 | **WAC173-303-200(1)(e)(iii) and 40 CFR 264.15(b)(4): Failure to provide adequate secondary containment system.**<br><br>Observation: On 3/30/2020, 6/30/2020 and 9/30/2020, the Ecology Agency was unable to inspect the KP McNamara Portland Cement Company containment system because it was covered by snow. The containment system could not be inspected for 11 to 20 days as required.<br><br>Required Action: Upon receipt of this notice, the company must provide a secondary containment system capable of holding any liquids spilled within WAC 173-303-200(1)(e)(iii) within 30 days of receipt of this notice. Please see the attached Compliance Certification for specific provisions and instructions. |
| -3210 | **WAC173-303-200(1)(e)(iii) and 40 CFR 264.15(b)(4): Failure to record weekly facility inspections.**<br><br>Observation: Stockpile inspection records were observed to have been not recorded for 11 to 20 days. Several other containment systems were observed to have been inspected and recorded within the required 90-day period.<br><br>Required Action: Upon receipt of this notice, the company must review its inspection schedule and procedures to ensure that inspections are recorded within the required 90-day period. The company must provide a copy of the revised schedule and procedures to the Ecology Agency within 30 days of receipt of this notice. Failure to comply with the requirements of this notice may result in enforcement action. Please see the attached Compliance Certification for specific provisions and instructions. |

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

## Other Requests

WAC173-303p-r2c2vOEi(c3e)lsvoigttylhaeu t h b o r e i q u y i e n s f t o r a n s a p t e i o n t a t o i h d e s i s p o o s f i t w a s W h e y n o r u e t t u h e e m c l 6 s r e p d l C a r m d i e a f d i d c r a t e h s e e s , l l o e v q u n f e g o i n h s f o r m a t i

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

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

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

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

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

September 12, 2007

**CERTIFIED MAIL**
**7007 1000 2456 1725 2**

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

**CERTIFIED MAIL**
**7007 1000 2456 1726 9**

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

Re: Compliance Cotmipolnet KP McNamara, WA Vancouver
WAH 000010603

Mr. McNamara:

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

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

This stated dressers matching pliances were identified in Vancouver facility. The enclosed Receipt document may be observed and concerned. The Report claudiest Compliance on the Wash. Ecology's addressed the prescribed time. As you know, it is a requirement of the Hazardous Manage Act (RCW 70.105 and 08.05) up to $10,000 per violation.

Have enclosed a regulation document and we copy the Dangerous Waste Regulation Thiions for more information below www.ecy.wa.gov.

Please contact 360/407-6348461@ecy.wa.gov for questions. Also, we will be waiting to your consultants for the.

Sincerely,

[illegible]

Dear Will Lamp, [illegible]
Department of Ecology Southwest Office
Hazardous Waste Toxics Reduction Program

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

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

**Ecology**
Lead Contact: Dwight Williams, HWTR - SWRO. Phone: (360) 407-6348
Other Representatives: Natalia Vetsyhaak, Hunter, HWTR - SVVRO
Douglas City of Vancouver Fire Prevention Bureau (360) 696-8008

Report By: Dwight Williams [signature] 10/2/07
(Sign) (Date)

## Background

KPM McNamara Trading Corporation (KPM) is a small business that distributes scrap metal. The company was not operating at the facility at the time of the inspection. The facility is located in a mixed industrial/commercial area. The facility is surrounded by a chain link fence with a locked gate. The facility is owned by Kerry McNamara (owner/president) and Connie McNamara (owner/vice president).

The Vancouver Fire Bureau visited the facility on 2007-08-07. The inspector observed the following violations:

- Waste is discharged or is being discharged into the environment or is being generated;
- Waste water derived from the cleaning of the facility is being discharged into the waste water system;
- Waste is being accumulated on site in a way that causes a threat to human health or the environment;
- "Dirty" absorbent is being stored outside the building;
- Salt-water is being generated and allowed to drain into the parking area and cleaned.

KPM McNamara has a separate LQG Corporate Office in Portland. Dwight Williams discussed starting up a pre-treatment system (see enforcement letter dated April 2, 2005).

This compliance report does not include an evaluation of conditions observed during visits.

## August 1, 2007 Inspection

Conducted by Dwight Williams and Dennis Wiese.

This was an initial announced inspection, not a compliance evaluation inspection. Mr. Williams arrived at 3:00 PM. The introduction was made to Jeff Hugh (the General Manager). Mr. Hugh explained that he had called Kerry McNamara and Connie McNamara (the owners) and they were on their way.

h a b d e e w r o r k a i K n R M 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 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 b e e u i l M r i H h 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 . t e p t w e e s d e e s t t i b n e e l d a i c n u e t d - , d o s w e n o f a h d s i t e . E c o l p o r g e y v i r o e u v s i l e y w M e S c D S c o s r o m o e f h e p s i e g m e a m t d e n , f i t r h m a t e t r e e s i d u e w a s o n - h a z a R h t S i c e l u r i s v h i a c r e d s l l i e s s p o s a l .

a T h e w r e e r a f e e o w u t - d o w r e h s n 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 a e 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 r b e e i m a g n a g e e d o u b l e d d d t o g o e d o r . M r H . u g h s e a s i n d i g h t f h b " e P e p t s c e t T e h e w r a e 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 ' l P e p r s e e s t i W d a n s e a n a g e f d a s l i a h e g e w r a o s u s e . M r H . u g h l e a s f e a r m e e d M S D S r P e p s S e e t e . P o l s n t s p e N c o t t i e o s n 0

• T h e w r a e a s t i l t a - n t c l a o b m p e a l c o t c o a r t e l a 9 h r d e o r t h c w o e r s n f e h w e a r e h ( o s u e s e e F i g A u ) T e h e w r e e r s e e v e s m a a l l ! o ' n t s p f e l l a l o s o u t h e d c s u i p a n r e b h o t t u , h i w t e s r e . c o a i t n e e d s i M r H e u . g h e e x s p l a t h a e t d t e o s n t a n i o n n i - n h g a z r a e 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 M c N a m m a a r m a a g 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 l a p s l a c a a r s ' d w e a d s t e r a a r g e d d l ' H . u g h e e x s p l a t h a e t d t 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 d o r u m o s n t a i n e p d a i d h i . t l e . - b a s s a i d o u l d r u w m e s n d e a n g e w r a o s u T s l e d e r u w m e s n e o l t a b e a k s l e a d n g e w r a o s u a t s n 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 n s w e h a d t a e n r s d l o a V p e . l a d l e t e r m n h i t a n h t e a h k a a s t l e a t s v t o c o m p a r o t m m f e e p n r o t s a s h s y h d . r , d ' 1 x c n i a d u ( s p t 1 H 4 c l ) " ; , a l s n e d c o f r o d r . Z E P " s o ( a p 1 " H 0 ) T h t e a w l a p s i p t e a d c o n v w a y o r h a d l o , c a n t e e a d T h y e . l a c o o u t h d : t a w l a s t a i w r h e i d t e w - i g d r h e i y e d r e s p i d l u e .

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

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

- Wewalktedotuhgebtstiostteoraargeeawestimtahtatedwreewed v1500 emptcytiehshairseSae.veorfahteotweesrleabeakbeedi"ntgrriipnlsaerdaS",Bubreak 4253Therenqweasstmairiobenhgetsoet Seesv.eortahteortweesmearkaesd conta".tirniimegthayrlabsedlzenWe2o0b1s"e.ovteodrteeahoeverldeadts thatabwoalus/f3uMrHu.ghseasicdctntaidrheeds,"vesolasskieifftaadrraited thseiwtiethrautclhiqiuniachldesayelsH.esaiwdlasodtangeMoWuisstealked ab.tohuretiosskpifIrldsotttehsattciolnltlaiqruids.

- Wereturnheedfaircesean,brevitehmeodsrtecmeanrtifaesdesofrondrosn-hazwasdtiespMsaanli#f0e0s1t691v25.9dJaUtKetd12y007sthowfeodwarsstterteamswemeanagedffButeiEnngvtiornoinKenTthanelanidfiedshtaeaetransporte nam(esignwaatsurioev iTdheedo)pv.yalsatdealdat.ppeathevtoo toessodium hydrowxeiidgeah,tiondgs550-pvwamsdesagedHsesiatiewdha.swfoutloltthesat weignmoerdehahat.

WeconcltuhdeeaspectttoilodhuMgrht.ehsbwtouflodrwhaidinsperoetpiodrhte neafutularsek.heidtmoamlewiathmcyuestWeotrhsa.nMkrel.ughfedsritsimaeleft thseiOefs.fiattte1:50a.

**August 2, 2007**

On August 2, 2007 ecaifvaexdMm_.HughhiersclMuSDeSdPrepsaentPlepsdet Thisformaasteivoinlyaeedcolcohgeymwihsoto,nfitrhmaetodruecstwodulel designsWaTt0e2angewraosubtseecaoufsheenfoolr,malaldrendhaypdhethalene concentrations.

**August 16, 2007 Follow Up Inspection**

Conducted by Dave Willis, Nathan Lanter, Cynthia Hourff

Wearrivedat9:00AMWemetJeHfughesTeamBrucehWeaenx.plathmaetd vivsaiatfollowhAeupgu1,2007inspeacntdiovtreh,aqduestabohutstwastes wegeneraantdeachagedslexplathmeadlvaeopteodbtaasianmpfIrethme "non-rewgausltaetweyads"eWeent.outlefeacwilMrHyugheswvemhaedreethe following observations:

- Sevetroatwleesrsset acikneslihdvea rehdFuosoef.thteostweesseparoaudtfdle stancekat,tmhaeiemtraTrhoeeyo.ntaviamreyadmroguonrhastelMrHaulg.hseashed didknn'otwhavtaisthteotaensdh,hlaeyldeetrhesrienhoeset awtoirnkfgidKrPg McNamara.

- Thteitlatahedompawcetroersean,tdhewreersevecrudatolwtnotiehshareAa. palolkeittlitwyaseear1b\H/uigrhseashiesometaidhdeskeilitytoesiichue totaensdd,eusesrsiptitldlhfelloTdhre.kiittsteyft (onshtohveehatedbrtufmor manifesfaisinhgzarwdaosutTeh)e.otek(pltytisseom)prebsasnedalen,sdlent offt6Shtfeacarecycling.

- Wedisculhsostvehwdeaswhatreer-cirscyuslttaetmrMdsnH.ughweassoatbtefully exphaowtrhreintsaenwkesrceonnetcotheeed-cirscyuslttaetmrd,imdoftuelxplain whatypoefwsasweesdeischtadrhgfeelobor MsHuumgph.esnosrtatahdok",dirritnyse tanwka"s,sevchetnotaerfseiwrasthoeudWeusepdHpatedretshtleiqiuhihdeank,

- 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 o 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 r a k n f l o u t n h d i a h t t a a d p H b f 3 o f 4 M r H . u g h s e a s c a l u s b d a { p o t a h s y s d i r u o 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 r a k n p d h r a i t g r 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 r 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 r a 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 h r e i r t s a e n k d i r n u t r 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 a 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 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 h a v b u m l a d k a e w a s " t d e a n g e o m c o u t s . "

11 W e d i s c u t s d e e d 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 t e o d 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 t , a s c o n s i e d r 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 r h e s i a d n u M e r , . H u g h s e a s f l d 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 r p c p h e a t o e c h t a a é i w n c o n 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 r e d g i f f i c u l t d u d b s y e t r h v e e n d o f h t e r n e . n . c h

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

- 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 n 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 t 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 d 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 p d l a c a e d o o f l o e m f f a s a i t y . s i s .

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

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

**August 21, 2007**

OnAug2s12,00I3 powkieP Ih iSleirpvices about MTahmecyfastth#A0t6 d 6 9p12 watlsteranspaotdvtteortweesmreeceaitvhedlac iThietsyet ta acdombivroeldume o5 5g0a l lSoenes-.mdaaitAeudg2s12,007.

**Augu2s82,007**

OnAug2s·t,20EDclo, Ifoogrywa KrPKlFMdc Namaanmame daicattlieo ttdeirrpercotper manageomfeonrtrdaeigewuas. SOhSee.pte4m2Oe0E7c,o lloegftyte lepmheosmseage wiMlhH.ughtedsisctuhseesEteorlaolgsyontaMorK.emMrcyNamahnpar,esodent KFMcNamaOrmSept e5m2Oe0E7c,o lsopgoykieMlhM.cNamaamrfaorwahridmedpy of hiemmedaicattlieotnHesrahlaWould prreofbeavbilryoinsestoTeanDyattilo, his-conHsesualMldHnutg.hheasdodtiscutshseeodbwehlaeyetmoughhajdust talwkiehdhm.

**SeptemOb2e0r07**

OnSeptem02e0r0I7 waentaoyBtreedinotrgeonCsreeneKEsnivdieroCromenstu²altiin MrJ.orgeinnsdeinctlahaevlmeetwiinKgFMcNamlaartaeIndeatydisccuosmspliance issuHeeksadeceaicvoepdyfhlemmedAicattlieo thatnedranttedd iscoim.pllsi.sance issuWeesdiscutshseeissses aeslesahlevouclamlewiamfyurqhestLiaonesr. thdaty, I MdHnutgahWtsea.grtemeeatKFMcNamoarSeptem12e0r07. .laater talwkieMlhM.cNamamlde, inCireekasnPdheieipvitsmesutsathfeacility.

**SeptemOb2e0r07 Follow-up Inspection**

Conducted By: Dave Will Nathan Laan, Matt Aynes, Kevin Wise
Attendee: Mr. Mr. Namara, Ms. Phillips, Mr. Mr. Namara, Mr. Jorgeinnsden, Mr. Kinn (Creekside

Afterrtrodwuectbiudrhewsa,rehaoruds ies cutshseedlosvsiumgs:

- MrHughweassolonvgerrkaiKnPlgcNamaTrear.rlaoutehwmoaumledplace him.
- MrMcNamsaaraaldo7u0t% fhoeperavtasfoocuosmeed-consttortOeqstu.shed totweesrseem6hifnqarlasrteicoysdMlrM.cNlamsaarhaedidwna'rttsentchem .over-bsuletedsidkmn'ocdwanyoimhnse, twahteescytchpeldastic.

11 On B0% fhbeusiwaefsoscuosmedleaannirchegfurboistTehsivnagswhattehrat g9etsohterearrcfthleomipsrwanshtilmoeutsoifobetaensfd,rdrhsee con(dary finrailh)sitesv.edlyIsuotaepayt Somaemouonfstoavpaytiesrlaolotweed-circtudlhavetaesshystNeomspeciinffiocrwaapstricoovnoirdlavdosl.uomiet,s consistreanocctye/rcihsatic.
- ThVeancoufavehiralasi'tcyauwsats(hp'otahsysdiruosxyisdtee)mM.cNamsaarfaldle soluhtaidpHb13o14T.hveasftreomsytshtivesnsuppctsbeerdoubtadla holdtiamwgh,eirwteaseusedwtaitsldodoirHtesyafldseolluwtaitschmenagedf-siatsdangewraosuTsheiusuahlapyeanbeodunticayeaMrrM.cNamsaarfaldle thouMgrHutghheasdonftulseodap andsycsatemnhtsenicshtavdeumped

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[1] Contact FMtc:Nam3 9 7H2amiAvtecn,evOH4 4 1 P4ho2 6 6 - 3 6 1 Fa2 9 5 5 3 6 1 - 8 9 5 6
[2] Contact Ecekesnivdieronment2a1 7 SDWCrhseuhCatTiiusgl,CaR9i7n0,P2ho5 0 3 - 6 9 2 Fa&1:18 5 0 3 8 5 - 9 7 0 2

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

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

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

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

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

11 W a s w t a e l s e i s n t g a g e d \ n h g e o r c t e h n c t f e h w e a r e h W u e s e t t e h d 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 l " e n d b a n a z a r d M o r M. s N a m s a a r t a b l e t s o e t c e o s n t a i n e d " u n k m m o a w t n e " t r h i w a a t l s e i p n r g o f b i y P l h e i d H e s p a . f t b w e a s w t a e s r e v i o u s l y s t c k r e e d a t h p e i g m t e o n t t e s x p l a t h E a e d l h o a g d y r e v i i c d u e s n l t y i n e s i e d t o t d e u s r i i A s g g u 1 s i t n s p e b a t s i k d e h n d a h t t e o t b e e l s a b e a l s " e w d a s t e p e n d i d e s i g n a a n t r d i o a t s h h b n a z a r d N o 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 n a z a r a l n o a u s s a d h e s i v e " .
  - O n e o l t a e b e a l s " e n d b a n a z a r a l n o a u s s " ' p o l y m e r " .
  - O n e o l t a e b e a l s " e u d s o e i d M r " M. c N a m s a a r i a d w a t d h r i a s i 0 m 1 e , p l . r 1 o t d t u o c t t e s .
  - T w 5 5 - g a l l u n a b e a l s " e h d a r z d a o w u a s s t O e n " w . a n s a r k a e s " d P a l R t e s 8 - n 1 , - 0 7 a " n t d h s e e c o w r a d s a r k a e s " d P a l R t e s , 8 - n 1 - M 7 M " c . N a m s a a r t a b l w i a s s t e w a R e p t s N e o r i l s a k b e l r S a r w k e e n t e h d e r u m s .

- On 5 5 - g a l h u l m a n b e a l s 'e s d o n l o i n d -, r e g 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 c 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 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 m g e w r a o s u t k s e s a i d h e c o u u l s d e h w e a s p t r e o p f r i e l v e i p o r u e s p l a y P e n d l i p B e e x r p v l i a t c h e a s t p a r t o f i l e w a s i t e d t h c e a u s s b i l c ( t p i o o t n a h s y s < i ; u h p r r o e x v i i n c h o a u n ) s a l g y e f d - l s s t i e t e e m . e d a p p r o p o r e a p e n o d f e i s l i e g v r a a s t t b e a s s c e n d h f e a t c h t M a r H . u g h h e a s c l o n f u s e d p r o c l e i s r a s e n 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 k 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 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 h 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 h n 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 a g e w r a o s u c t s i e r c u f l r a t h n e e i n t s a e n M s . M c N a m a a g r a e e d .

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

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

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

E c o l r o e g c y e a i n v a e l d y t e i s c i a t C n s l u n A l n i a a l y T t h i e s y a o w t e h d a h w e a s i t t e h f e l o o r s u m c p o n t a p i h r e a o b t l o r m a l d a e h d a y a d p e H , v e 2 . T 5 h . p e h e a o t 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 1 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 l e e y t h f e e l l o w f i o n g t m E a c t o b o n g y :**

- A p r o c f e l s o b s w a g s r h a o m w h i c n t w g h w e a s s h y s t i e s m e l d n c p u r o b e c i e n s s s t r u m e n t a t s u c a h s w a l b e a s k é t a t l e a r e m t s c ,.
- A w r i d l e e s o r o i f p h t c e i o o n t c r p o e l r s a t o r c e e m p e s t y r e a e i 9 n o i t n h g e e r c h a n i s m s p u i t p l a t o p e r e v t e h a e 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 o l s i g y a S r t e e s n i g w a e w b a , t e a n s d , o t h w e a r s t l e n s c . l i u n d f e o r a n b c a w u t h t i o s h e s p o n s d i e l s l i e g w a s t w e h g s t , t y p o e f s w a s t a e l s e a a b n a l y z e d l f u i t s i h o n a g s a s n a d y o w , f t w e a n s t a e p e r o f f i c d l r i e s d p d s t a l . a p p e t a h w a s a t s w h a t e r m o a v y e i v n a e s t , y f f p e r r o e d h u t c t a t e r s e i n s P e r c b . v s i p d e e c i f i c i n f o r a n t a c h u i o t w r h v i a s r i a s d l r e i s t s h d e e s i g p a c t e s s
- 111 A w r i d l e e s o r - i d p f t K P M c N a m v a i e l a n l s u 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 h e e f f d e s t e n P a r t o i v i o i n r d f e o r a n t a c d 2 u 0 t 0 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 n i s p a g n a d t e e s r c ) r , o i l p c t v i c o m t a m i a p r a e r e t v s e f n r t o e m d b e i w n a g s h o e f c d f o m p r e t s o s t d e u d s r s l h n i g p m e n t .

## Compliance Problems

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

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

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

  R e q u A c e d E o n s l : d g n y n e s l A i c a t t L i e e t n ( t d e a r A t u e g l 2 s 2 t , 0 0 r 7 e ) q u e s t e d d e s i g i n a f o o f n c a r t w i a o s m n e a s a g e d f - T s h i i t s e f . o r m u a s t o t 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 reorv, ie cs ei g in a f o o fm c a t rh fe co In l w o a v s s h t g r e a m s
t h w a e t r o e b s e o v n e e d r 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 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 o k " .
- W a s f t e o n h s o m m p i x v e i d t h c a u s p 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 n d - , R e g w a l s a i t t n e d " d r u m .

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

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

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

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

adequsateconcdoanrtyaitnhmeleyindohta vaedequcaneteorporlsp,aebrealnichg; thweyrneoptropienrslpyetcotepdreevlenatsceesntvhieronment.

RequActeiEccro:lolgnymesAicattLieonter previtohcesteyalnoasdufrreess thfelscumEcologdyisaclussbsecalhosoufrreintsaenaknsdtainletsanksst durtilmSeepte1m12,e0r17nspeTcthefcoolnl.fowrichgreericstrioovnided:

11 Wit14dnaysrecofeflptetftiendie,schontarmainsaksstEgmso.loobgsyerved thsactmoefhwiosrwlascomplosSteepte1m12,e0r07nryesi(dvuawsanter) generbaydteecdontarmhiteaastkisntgreumsstepropaecrcluymualnadteesdignate asrequiiWrAeC173-303-070.

11 Wit30dnaysrecofeflptestatnedrfcteeaenaiosngysteevma,leuaacthank systtedmeterimfiazerdcoonusstiweureenrtesatdsheechviroTnmiesnt. evalumautsmiteonfdthcespuerrefor.msatnacmdeafriidWsAC173-303-610(2 PleaasetdohaettaGuniedafmCcrleeCalnosolD.aJnrgeeWraosuFsacilities (Publ#0941-1)ion

11 Wit45dnaysrecofeflptestptreorva,widrteetpoFrctolwohgiyicrnhcludes.a descroifphtteiaonrkstemnlsstr(uectthseiozre/diomfehseysisitjeomi,nt configpuirpaatnigotnhi,nrtepgarmcatflshteaaskstAmspcovtindeesofthe evaluiantcilound,ingtanegbfseerevnecedpracscbrlaegmkssatshuacdh.01- inchi,tting, voorithasenrompaeibtnedesimgrTentiesfrwiabteliscetdon deterimfiazerdcoonusstictouwhelandvtesenreteseagsredundwater.

5)WAC173-303-a1200(2)(y)(edf)erFeanicteuprrevailadbetehlat identi thmeajorisksassociwitthaeasitrtheontainers.

Observa Theotaendrumsangewraosuatsecumualkaf Mel Namdaindot inclruidsakbels.

RequActeidlommedieupbreelcyefprtesplartepltaendrumsidentiefy ri(sikteexcjocrrestidWie)t,?indasyusbmhoto-doctumeadcnttaatiinoenrs hasbeepnroplearbleydbedtthiemfmyedriiastke.

6)WAC173"303-a2r0d.(2)(y)(2)FerFeanicteudreevelopfanhadowr writitnesrpesscthiedioglreenefraaclii hispyections.

Observa Spiwdenlsseobservedndiuntsstiindeaerehaaisdtep,peatrtedat operawteonestwacrfeequirtemnietnisgpaiwtheletsnhecycaunrdindoftollow. aimspescctheiodnfuhfeacility.

RequActeiWoint30cralechadyadse,vealnofdpolalowwriintstpeesccthieodfnure inspeacntbimigteoqruiinpgsmaefnatnteymergency seequudrpimteycnces, an operatsidnguequiratmhehanetpevdeentte,ccesptobnadzatrtodhspeublic headttheenviroPnmmoevaictoepyfhiinsspesccthieodnEcology.

**.7 )WAC 1 7 3 - 3 0 3 - a 2 r 0 b 0 y ( 4 f ( e 3 e ) 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 d r e b s y S 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 o a t d e q u a a d t e r l t e y 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 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 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 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 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 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 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 s 7 3 - 3 0 a 3 n - d 3 3 4 5 0 0 .

**9 )WAC 1 7 3 - 3 0 3 F a 5 0 t u h 2 e v a : p e r m h a t c e t p r t e o , a d t i s p o o f 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 l a m e g e w r a o s u t S e h t e o t w e e s n e o " t e m p a t s l y e " f i i l W e A C 1 7 3 - 3 0 3 - 1 6 0 ( 2 a n d t h e r K e F M c N a m o a p r e a r a s a e a l n g e w r a o s u t s r e e a t s m t e o n r a t a n g d i s p o s a l f a c i l i t y .

Requ 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 l 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 .

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

***Instru*** R e f d n S s m p l E o c o R e q u a s E x t e n - s U i s o e m f i c s t m e p t o h r a t e q u i r e d a c t h a m 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 d / P O B o s 4 7 7 0 5 y m W A a 9 8 5 0 4 A - n e 7 x 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 n c 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 .**<br>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 y 6 n d A 2 0 0 U 5 n t f o r m a y t i o n i n c w a s p t r e o f l i a l b e o s r a a n t a o l e y s o d t s h p e r r t i m f e o r t m a t i o n . E c o l i o s g o y s i n t e r i e t h s h e e d l e s o i f g n n o a n t - i h o a 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 .<br>W i t h 1 0 n d o a f y e s c e f p l t e s t p t r e o r v d i e d s e i g n a t i o n t h e f o l l w o a w s i s n t e g r e t a h m a s t n o e b s e o m e d i n S t e e p t e m 1 2 , 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 d a u s s t 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 n ( p m i w e d d a u s a t n i ' d s s ) o , l i d , n o n - r e v g a r s t a e t e d | W i t h 1 0 n d a y s<br>W i t h 1 0 n d a y s f o r m a t i o n f o r d a y s |
| **2 W A C 1 7 3 - 3 0 3 a 1 4 t f o m r i e t i s g p a i t o l e r l e s l e a s e s .**<br>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 n d e 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 .**<br>W i t h 1 0 d a y o f h r e e c e f p l t e s t p t r e o r V E i c o b e l w o i g d y b c u m e n t a t i o n t h t a h m e a n i d f i e s s c t r e h p a l s e e c r p r r e A c l t s e o d t E i c f o y l o g y a n s b o u t o t h m e a m i f ( e g s e n s e b r e a t t w e l a c e m u 1 a 2 , r 0 y 0 a 6 n A d u g u 3 s 1 2 , 0 0 t 7 h ) a t m a k y a h e a d i s c r e p a n c i e s . | W i t h 1 0 n 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 . æ 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 .**<br>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 f e o l n l . o w i n g | |

| | | |
|---|---|---|
| furdhe ericpstricovnided:<br>• Wit h 4 dlayosfeceefpltestftiendiescho 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 e p r o p a e c r c l u y m u a l n a d t t e d d e s i g a n s a e e q d i i W A e C 1 _ 7 3 - 3 0 3 - 0 7 0 . | Wit h 4 days | |
| • Wi 3 0 d a y o s f e p e 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 e r f d i s W A C 1 7 3 - 3 0 - P 6 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 u 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 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 t e r i m f a z a e r d o u s c o n s t c t o u h e a n d V t e s e r n e l e t a s e o i d g l r o u n d w a t e r . | Wit h 4 5 days | |
| **5 W A C 1 7 3 - 3 0 3 a n 1 2 7 0 0 ( 2 b ) y r ( e d f ) e r F e a i c t 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 .**<br>I m m e d i u p t r e e l c y e f p r t e s p o a r t e p t a e n d r u t n o s d e r t h r e i f s y k l m m e d i a t e l y ( i t e x j c , e c t o d V . r i ) d . 7 5 i c h a s y u s p n h o t o - d o c t . h u a n t e n t a t i o n c o n t a h i a n v e e r e s n r o p l e a r b l e y 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 t e u d r e e v e l o p a n d / o r a w f r o i l t l t o e v n i n s p e f o g r e i r o e f r a a c l i h e s c p y e l c e t i o n s .**<br>W i t h i c a l 3 0 d a y s r , a l e f o c e l a l 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 d . e y a < ; > f t h i i n s s p e s c c t h i e d r E i c e l o g y . | W i t h 3 0 days | |
| **7 W A C 1 7 3 - 3 0 3 - a 2 r 0 k 0 y ( d f ) e ( e 3 e ) n F c a e i t 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 p 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 p a i n m e i o n g r d s .**<br>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 0 y ( d f ) e ( e - e 3 n 5 E 0 e : i t 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 t i n R l e a n n g e l m e r g p e n o c y e d u r e s .**<br>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 c 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] Immediate Exceptions to Dangerous Waste.** Immediately [illegible] | | |

[illegible]

[illegible]

Kerry McNamara, President
KPKPMcNamara

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

May 19, 2008

**CERTIFIED MAIL**
**7003 6450 0001 6954**

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

RE: Dangerous Waste Inspection KPMcNamara - Vancouver, 2008 RCRA DWAH 00022556

Dear Mr. McNamara:

The Department of Ecology conducted an inspection of KPMcNamara's Vancouver on May 7, 2008. Further information on the Operator's Ecology inspection.

The purpose of the inspection was to determine the facility's compliance with the State Dangerous Waste Regulations (WAC 173-303). Observations summarized in the attached Compliance Report. The violations observed must be corrected within the time frame stated in the accompanied resulting in the issuance of the Hazardous Waste Act (RCW 70.105.080 and 095).

KPMcNamara - Vancouver was a generator of dangerous waste (Pacific Power Corporation), and the inspection was conformed to the Pacific Power Corporation, was conformed to the Pacific Power Corporation, WAC 173-303-1 4e1q(u2i) Terminal Storage Facility. Violations stated in the accompanied Pacific Power Corporation, Pacific Power Corporation, WAC 173-303-1 4e1.

Please contact 360-407-6348 (deiwoh4a6v1e@yucey.twia.ng.gov) about the correct quaicrteidamasl.sovaitlcaobwteytoh your consultants.

**P?J.at-_**

Dean Rnams, Inspector
Hazardous Waste Toxics Reduction Program
Southwest Office

Enclosure: Compliance Report

cc: Douglas Vean, Wisconsin Water Resources Protection
(Douglas.Wisconsin@ac.us)
Brenotrgeo Creek Environmental Trinity (abtrienngtrj1@comcast.r
Erkin Cgr, Creek Environmental Trinity (kingking113@comcast.r

| | | |
|---|---|---|
| Facility Name: **KP MCNAMARA** | Facility Type: DLQG | **PAGE 1 of 2** |
| EPA RCRA ID #: **WAH000022556** | Inspection Date: **05/07/08** | |
| Site Contact: **Terra Dutcher, Operator, (503) 717-3088** | Inspector Name(s): **Bill Wiles, SWRO - HWTR Washington State Department of Ecology** [illegible] | |
| Address: City: Zip: **5005 SE Marine Drive, Bldg 5, Ste B, Vancouver WA 98661.** | **X** Full Inspection / Targeted Inspection | |

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

**Notes (include site description, areas inspected):**

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

The waste stream [illegible] parts washer [illegible] [illegible]

The [illegible] Mr. Dutch [illegible] [illegible]

Mr. Dutch [illegible] dangerous waste [illegible] Inspection [illegible] on April 25, 2008 [illegible] dangerous waste [illegible] by Mr. Dutch on April 29, 2008.

Mr. Dutch [illegible] waste [illegible] Portland [illegible] provided documentation including:

- Bill of Lading # [illegible] 500 gallons [illegible] January 2008.
- Bill of Lading # [illegible] 660 gallons [illegible] February 2008.
- Bill of Lading # [illegible] 825 gallons [illegible] March 27, 2008.
- Bill of Lading # [illegible] 700 gallons [illegible] April 18, 2008.

I asked Mr. Dutch [illegible] dangerous waste [illegible] managed [illegible] Mr. Dutch [illegible] [illegible]

We reviewed [illegible] KP McNamara.

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

O n M a y 8 2 0 0 8 e c e a i r 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 V 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 o c u . m t e h m a t e y S h " a e l s o d i c l a t h e t e r e w c u b l e s e a r h 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 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 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 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 u T s a n l k a s b a s l a d g w r a c N 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
D[tT.
ITGION STAI£
Of ECOLWI

Washi Sct tDtep a r tmfec ot lHbagzya rWlaosu&se Tx iRœsd u cPtrioogn r am
Inte Ardrdertestp://www.ecv.wa.gov

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|---|---|---|---|
| ISJ.buthRegtOnfafl | DeNorthRveegsitOnfafl | DeEastRegioOnfafli | DeCentral Regiona |
| POBox47775 | 319-06tAvSE | 460N1MonrSote | 1West YAakSitrea0 |
| OlymWpAi9a8504-7 | 7B7e5lIWAV98008-5 | 4Spokane9WA5 | YakWnA98902-3452 |
| Phon(e3 6400)7-630 | 0Phon(e4 2654)9-7000 | 0Phon(e5:0392)9 340 | 0Phon(e5 09) 75-24 |
| FAX(:3 6400)7-6305 | FAX(:4 2654)9-7098 | FAX(:5 0392)9-3529 | FAX(:5 0597)5-2809 |

# N'OTTIOCEOMPLY

1. Yomusctomplseitgem,slentchCeomplicaenrcteitfEiccaltveigyh30ays.
2. Are-insmapycctalomtyimverciofryreocft,iovnieollations.
3. Formenlforciemœhatdrisnisotrrdaatnjslveena lutpti,Se1s0,p0e0r0ayevriolation.
4. Correcftlinfeonllovwionlgdtoieosmseafnorrmeaforcæmtevinothlbtetakæganitnhsfitscility.
5. Aliosfittetmhswtrcehecf ecomplliasrocuendthoemecslumnsrofviolations.

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|---|---|
| InspeTcytpioOnEI X DCAV DCDI DFU.I DOther PAGE<br>Compliance Evaluallon hsoecllon / Compliance Assistance Visll / Case Deve Jopment Insoaclln / Follow-up Inspeclln | |
| FacNameys:<br>KPMcNAMARA | InspeRtlome#):<br>DeWill 3 6ms 407-6348 |
| InspeDcattieon:<br>05/07/08 | StatelDE#P:A<br>WAH0 00 02556 |
| Inspectors:<br>DeWilliSaWhrsO,-HWTR<br>oo·Wuegis/sanoWaeer RePsrcoutreccetion | SiRheo#n:e<br>36,0-695-2450 |
| SiGcenttaicttl,e:<br>TerrDnuctchOpera(0 53)7-3088 | SiGcentea-cmtail: |
| SiAtedrGesZsyp:<br>50SEMariAvneBel,c5 8tBe,<br>Vancouve 8 6 6WA | |

| Violcbtdeen (WAC173-303); | Writ Stuemmaor Vyiolaatni Cconrsr emteieodnesd |
|---|---|
| -141(2) | WAC173-303-141t(o2s)ep pFrao ipplrruioacedeeaunrdeesthwvdlsesnendin astated-eosnilgyndlathgedwesstseroout-off-asctialtiety.<br><br>Observ aKPMcoNhasmara odsitsaptoestsedmalcnygerou{sw-awsatsetweate thrcPuagcHPdwVear(cPPVMR)ortCraengdKPMcNamamahtalvinedtific (on-tshiPatPteV)abseeanuthobrytihOerdegDcemparotmEenvtiroOmeanltiaty (DEQe)ccepwtvaste.<br><br>RequActeidUbpnosnecefplitestbteegcicomplwyitithgeroceflosmeensdin stanotheleysigchanrtgedwraosuttsœut-ofastpteWAC1e7s3-30(32-)141 Wheemetuthmeeinncglosed Ceomplipfriacvtalfeee,llowing:<br><br>• Documenftradtthireeercesvatfm BPVaancceptewaste<br>• Copiesfsigaedlatmeadnifferesatcsshipmvasstemt BPV2008<br>• Awristtemmalfywastewastperecitfriecam BPV |

| NOTICE COMPLY | PAGE |
|---|---|
| 630(6) | **WAC173-303-2000(4)(b)(6)(3)(F6)(a): Tuck on due to kinspection of dangerous secumulate and containers.**<br><br>Observation: The owner's kinspection conducted per 2250,0 w8h, in the KP McNamara kinspection were kinspections.<br><br>Required: Accident immediate-sweep kinspection of dangerous containe management. Submit copy of hien spelcoff go Apr in May to date 2000,8 when you return the Closed Compliance Certificate. |
| 640(6) | **WAC173-303-2000(4)(b)(6)(3)(F6)(a): Tuck on due to kinspection of dangerous tanks secondary containment.**<br><br>Observation: The tanks kinspection conducted per 2921,0 w8h, ich means McNamara kinspected were kinspections.<br><br>Required: Accident immediate-sweep kinspection of dangerous tanks management. Submit copy of hien spelcoff go Apr in May to date 2000,8 when you return the Closed Compliance Certificate. |

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 Hansen, Waste Reduction Program

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

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

| | WAC Code | Conditions Requirements | Facility Status | | |
|---|---|---|---|---|---|
| ESQG | 173-303-070(8) | Quantities of dangerous waste generated and accumulated on-site shall be kept below the limits for a conditionally exempt small quantity generator (CESQG) as specified in WAC 173-303-070(8). | D | D | D |
| | 173-303-070(7) | All waste must be accurately counted and documented to verify compliance with applicable limits. | D | D | D |
| | 173-303-070(8) | Dangerous waste must be disposed at an authorized facility. | D | D | D |
| | 173-303-070(8) | Generators must manage dangerous waste in a way that does not endanger human health or the environment. | D | D | D |
| | 173-303-060(5) | If the site is a CESQG, the owner must notify EPA. | D | D | D |
| | | MQG and SQG Requirements (in addition to CESQG requirements) | | | |
| MQG | 173-303-060(1) | Site must have an EPA ID number (apply online at www.ecy.wa.gov) | D | D | D |
| | 173-303-060(2) | Revised site ID form must be submitted to reflect any ownership or address changes | D | D | D |
| | 173-303-060(5) | An annual report must be submitted to the Department of Ecology | D | D | D |
| | 21Q(2) | Copy of the annual report must be retained for 3 years | D | D | D |
| | 173-303-210(3) | Waste designation must be kept for 5 years | D | D | D |
| | 173-303-180(1) | Dangerous waste manifest must be used for off-site shipments | D | D | D |
| | 173-303-210(1) | Signature of the manifest must be kept for 5 years | D | D | D |
| | 173-303-220(2) | Exceptions report must be filed within 45 days if a manifest is not received back within 60 days | D | D | D |
| | 173-303-140(2) | Personnel must be trained in hazardous waste management | D | D | D |
| | 173-303-070(7) | Accurate records must be maintained | D | D | D |
| | 173-303-170(3) | Treatment must be performed in accordance with applicable standards | D | D | D |
| | 173-303-300(5) | Required annual reports must be submitted | D | D | D |
| Washington | 173-303-170(1) | Waste must be properly disposed | D | D | D |
| | 173-303-070(4) | Waste must be designated | D | D | D |
| | 173-303-070(6) | Approval must be obtained for storage | D | D | D |
| | 173-303-140(2) | State-wide training must be documented | D | D | D |
| | 173-303-630(5)(a) | Containers must be in good condition | D | D | D |
| | 173-303-200(1)(b) | Dangerous waste must be properly managed | D | D | D |
| | 173-303-630(3) | Containers must be inspected | D | D | D |
| | 173-303-630(5)(a) | Containers must be in good condition | D | D | D |
| | 173-303-630(7) | Containers must be labeled | D | D | D |
| | 173-303-200(1)(b) | Waste must be properly managed | D | D | D |
| | 173-303-630(6) | Accumulation must be limited | D | D | D |
| | 173-303-200(2)(a) | Waste must be managed properly | D | D | D |
| | 173-303-200(2)(b) | Waste must be managed properly | D | D | D |
| | 173-303-630(8)(b) | Containers must be closed | D | D | D |
| | 173-303-200(1)(c) | Waste must be managed properly | D | D | D |
| | 173-303-630(4) | Containers must be in good condition | D | D | D |
| | 173-303-630(9) | Incompatible waste must be segregated | D | D | D |
| | 173-303-630(5)(c) | Minimum separation distance must be maintained | | D | D |
| | 173-303-200(2)(a) | Waste must be managed properly | | D | D |
| | 173-303-016(5) | Accumulation must be limited | D | D | D |
| | 173-505(2)(c) | Records must be kept | D | D | D |
| | 173-802 | Compliance with the Recycling Rule 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 all personnel [Permit Condition II.D.1] | D | D | D |
| | -340(1) | Emergency equipment available and accessible [Permit Condition II.D.1] | D | D | D |
| | -201(2) | Posting of emergency phone numbers [Permit Condition II.D.1] | D | D | D |
| | -201(2) | Designation of emergency coordinator [Permit Condition II.D.1] | D | D | D |
| | -220(1) | General inspection requirements [Permit Condition II.D.1] | D | D | D |
| | -220(2) | General inspection schedule [Permit Condition II.D.1] | D | D | O |
| | -320(2) | General inspection [illegible] | D | D | O |
| | -320(2) | Tank requirements [illegible] | D | D | O |
| | -320(2) | Tank specifications [illegible] | D | D | D |
| | -340(4) | Arrangements with local authorities documented | D | O | D |
| Storage Practices | -515 | Requirements for emergency equipment | D | D | D |
| | -515(4) | Use of containers in good condition | D | D | D |
| | -515(5) | Use of containers storing dangerous waste | D | D | D |
| | -515(6) | Containers labeled [illegible] | D | D | D |
| | -515(6) | Dispatch [illegible] | D | D | D |
| | -515(6) | Containers [illegible] | D | O | D |
| | -515(6)(b) | Use of containers and containment [illegible] | D | D | D |
| | -522(2) | Anti-freeze [illegible] | D | O | D |
| Recycling | -120 | Recycling [illegible] | D | D | D |
| | 525(1) | Regulated [illegible] | D | D | D |
| | -505(2) | Recycling [illegible] | D | D | D |
| | 505(2) | [illegible] | D | D | D |
| | 525(1) | Recycling [illegible] | D | D | D |
| Contingency Plan | -145(2) | Aspects of the environmental [illegible] | D | D | D |
| | -145(3) | Aspects of the [illegible] | D | D | D |
| Lamps | -573(1) | Management of the environment | D | D | D |
| | -573(1) | [illegible] | D | O | D |
| | -573(1) | [illegible] | D | D | O |
| | -573(1) | [illegible] | O | D | D |
| | -573(1) | [illegible] | D | D | D |
| Other | -640(6) | Daily [illegible] | | D | D |
| | -640(5) | [illegible] | D | D | D |
| | -640(4) | [illegible] | D | D | [ ] |

Facility Lat/Long: (generated [illegible]) YES! [illegible] 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

Inspectors:
Dewill Sams, HWTR
Douglas Vancouver Water Resource Protection

Instructions:
1. Violations of the checklist are subject to the Notice to Comply.
3. Document that the violation has been corrected by Ecology Hazardous Waste Compliance Certificate.

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

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

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

Washington State Department of Ecology Hazardous Waste & Toxics Reduction - Pr
Internet address: http://www.ecy.wa.gov

| Southwest Regional Office | Northwest Regional Office | Eastern Regional Office | Central Regional Office |
|---|---|---|---|
| PO Box 47775 | 3190 - 160th Ave SE | 4601 N Monroe | 15 West Yakima Ave, Suite 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 within 30 days of receipt of this Notice. Failure to comply with the Notice may result in Ecology, and including purchase of compliance (at the cost of the violator), as it deems appropriate.

You may request extension of the compliance date by submitting a written request to the Ecology Compliance Officer identified in the Notice. Ecology may grant extensions at its discretion. Failure to comply with the Notice may result in Ecology, and including purchase of compliance (at the cost of the violator), as it deems appropriate.

You may request an extension of the compliance date by submitting a written request to the Ecology Compliance Officer identified in the Notice. Ecology may grant extensions at its discretion. Failure to comply with the Notice may result in Ecology, and including purchase of compliance (at the cost of the violator), as it deems appropriate.

## Compliance Certification

1. I certify that the violations cited in the Notice of Compliance have been corrected.
2. I have personally examined and am familiar with the information submitted in this document and all attachments and believe that the information is true, accurate and complete.
3. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.
4. I declare under penalty of perjury that the foregoing is true and correct.

| | |
|---|---|
| Signature: | Print Name: |
| Position/Title: | Date: |

## SUMMARY of FOOHAZVAR / : \ _ s i A-O,.+-.,\.O □i:

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

RECEIVED
JAN 2008
Washington State Department of Ecology

**K.P. McNamara - Vancouver**
**Pollution Prevention Practices**

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

**WAC 172-.3 Waste Designation**

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

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

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

**WAC 173-30 Spill Cleanup**

1111 Spill [illegible] WAC 173-33-145

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

Spill [illegible] accumulated [illegible]

**WAC 17.3-.3 Stack Standards**

e Rinsate [illegible] 2500 [illegible] water [illegible] 0 [illegible] Rinsate [illegible] WAC 173-30 [illegible] maintained [illegible] WAC 173-30 [illegible] requirements

; \ ¥ AC 173 N-on3-0p3e-C8p5e0r{ta2(t)d Eomp T oytAecsc e p t e d )

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12-28-07

Kerry McNamara, President Date
KP McNamara

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