TSD File Inventory Index

Date: November 11, 2008

Initial: CM Guerrero

Facility Name:	Fulton Industries, Inc. (the Fulton Site)
Facility Identification Number:	OHD 098 010 736

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

Tab 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1.			

Note: Transmittal Letter to Be Included with Reports.
Comments: the field site.

A.2 Part A/
Interim Status

NF

OhioEPA
State of Ohio Environmental Protection Agency

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

George V. Voinovich
Governor

Donald R. Schregardus
Director

May 10, 1993

Fulton Industries Inc.
Attn: Ned Griggs
P.O. Box 377
Wauseon, OH 43567

RE: EPA ID#: *OHD094810736*

LOCATION of INSTALLATION: *135 E Linfoot*
Wauseon, OH 43567-0377

In response to your request of March 1993 the following information has been updated:

Removed transporter activity status.

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau

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

TEC/bab

cc: U.S. EPA, Region V
Ohio EPA District Office

JAN 10 1985

5HS-13

OHD 094 810 736

Mr. Tom Carlisle
Ohio Environmental Protection Agency
Division of Solid and Hazardous
Waste Management
361 East Broad Street
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Carlisle:

We have been reviewing Ohio facilities that have requested withdrawal of their Part A permit application. During the course of our review, we have uncovered several facilities which are not Ohio permitted facilities, but operated as interim status treatment, storage or disposal facilities after the effective date of RCRA and ceased operation without going through closure. The facilities concerned must submit full closure plans and these plans should be obtained as soon as possible.

Simmonds Cutting Tools located in Newcomerstown, Ohio (U.S. EPA ID #: OHD 018-221-253) Brian Blair of OEPA inspected this facility in 1983 and noted a surface impoundment and on their Part A, D83 was listed, which is a disposal impoundment. If they closed the impoundment in place they will need to submit a closure plan and a post-closure plan, plus they must address adequate groundwater monitoring and financial responsibility.

Fulton Industries Incorporated located in Wauseon, Ohio (U.S. EPA ID #: OHD 094-810-736) submitted a Part A to U.S. EPA on October 15, 1980, on which they listed a waste pile (S03). They also included a picture of their waste pile. There is a possibility that they were storing acutely hazardous waste in the pile. Fulton removed the pile in June of 1982, until that time they were operating the waste pile under interim status. Fulton must go through a full closure and test for any possible contamination.

Morgan County Landfill located in McConnelsville, Ohio (U.S. EPA ID #: OHD 000-720-243). In a letter to U.S. EPA dated July 1, 1983, Morgan County stated that they accepted hazardous waste until July 1, 1981. They submitted a Part A on November 13, 1980 on which they listed D80 as their process code. Morgan County ceased accepting hazardous waste in 1981 and never submitted a closure plan or a post-closure plan. They did some preliminary groundwater monitoring and submitted results in 1982, but we have not received anything since then. Morgan County Landfill must submit a closure plan and a post-closure care plan.

Doherty Sanitary Landfill located in Geneva, Ohio (U.S. EPA ID #: OHD 052-315-056) submitted a Part A to U.S. EPA on November 17, 1980 on which they listed D80 as their process code. The waste stream they said they were accepting was U013, which has been delisted, but in Doherty's Part A permit application, they referred to accepting other hazardous waste streams. U.S. EPA has sent numerous requests for information and has received nothing in response. If they have accepted other waste streams, they must either submit closure or comply with the interim status standards for landfills.

The last facility is Chemical Leaman Tank Lines, Incorporated, located in Ross, Ohio (U.S. EPA ID #: OHD 045-618-914) on March 25, 1983, Chemical Leaman submitted a closure plan for surface impoundments located at the facility. There is some question as to whether the waste contained in the impoundments was hazardous. Chemical Leaman may have also been a storage facility. Please let us know of any action taken on the closure plan or the designation of the wastes in the impoundment.

U.S. EPA will be closely monitoring progress OEPA makes in bringing these facilities into compliance and will be considering possible enforcement action, if the State does not act in a timely manner. Please send any information or additional correspondence on these facilities to U.S. EPA. If you have any questions, please feel free to contact Ms. Rebecca Strom at (312) 886-6194.

Sincerely yours,

Daniel J. Banaszek, Chief
OH/MN Technical Unit
Solid Waste Branch

cc: Cheryl Kaiser

bcc: Jim Mayka
Rose Freeman
Lisa Pierard
Paul Dimock
Rebecca Strom
Part A Files

FULTON INDUSTRIES INC. 135 East Linfoot Street, Wauseon, Ohio 43567 419-335-3015

FULTON

17

October 6, 1983

RECEIVED
OCT 12 1983
WASTE MANAGEMENT BRANCH

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

OHD 094 810 736 PA, G, TRS, TSD

Attn: Mr. Jim Mayka

Re: Karl J. Klepitsch, Jr. - his letter dated September 9, 1983.

Dear Mr. Mayka:

I talked with Mr. Banaszek, on 9/13 and again on 9/28, with regard to the referenced letter and he said that he would check through our file to determine how best to resolve our problem. Briefly, these are the facts:

We did have wastes stored outside, during a period of uncertainty as to how and where to dispose of said wastes. The pile was created by covering the residue from our treatment plant with a layer of clay each time we dumped, in order to reduce run off.

During this period, our Mr. MacLeod filed for a "storage" permit, believeing this was necessary. Per our records, the permit, for whatever reason, was never granted, and was really requested in error. (We are a generator).

This pile of waste and dirt (approximately 100 cu. yd.) was removed during the months of June 1982 by Fondessy Enterprises EPA I.D. Code #OHD 045243 706.

Since that time, our chemical wastes have been stored in a covered hopper, provided by Fondessy, which is picked up approximately every 80 days. We have no waste storage on the premises, other than the hopper.

If we can supply any additional information, please let us know.

Sincerely,

FULTON INDUSTRIES INC.

R N Cheney

R. N. Cheney
Vice President

cc: Mr. Dave Banaszek

RECEIVED
10/18/83

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

SEP 09 1983

REPLY TO ATTENTION OF:
5HW-13

R. N. Cheney, Vice President, Manufacturing
Fulton Industries, Incorporated
135 East Linfoot Street
Wauseon, Ohio 43567

RE: Permit Application Withdrawal Letter
(Insufficient Information)
FACILITY NAME: Fulton Industries, Incorporated
U.S. EPA ID NO.: OHD 094 810 736

Dear Mr. Cheney:

This is to acknowledge receipt of your letter of June 14, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request did not contain sufficient information to enable this office to concur with your determination. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265, Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

Please do not hesitate to contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter, (Insufficient Information)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

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

Enclosure

cc: R. H. MacLeod, Vice President, Operations

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
   - ☐ Show to whom and date delivered..... ___ ¢
   - ☐ Show to whom, date and address of delivery.... ___ ¢
   - ☐ RESTRICTED DELIVERY
     Show to whom and date delivered..... ___ ¢
   - ☐ RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery.$ ___

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Richard MacLeod
125 Linfoot St.
Wauseon, OH 43567

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	313566	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

X Ci R Cl

4. DATE OF DELIVERY

POSTMARK
WAUSEON OCT 26 1981 OHIO 43567

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO : 1979-288-848

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, and 3 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

RETURN TO

U.S. Environmental Protection Agency
Waste Management Branch
111 West Jackson Blvd.
Chicago, Illinois 60604

(Name of Sender)

(Street or P.O. Box)

(City, State, and ZIP Code)

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

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

OCT 1 6 1981

Fulton Industries, Inc.
Richard MacLeod, Vice President
125 Linfoot St.
Wauseon, OH 43567

RE: Hazardous Waste Permit Application-Incomplete Part A (OHD094810736)
Facility Name (and EPA ID number)
Facility Address

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (*) on the application form, and return the form in time to reach this office by November 16, 1981. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by December 16, 1981.

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Allen Debus, the reviewer of your application, at (312) 886-6162 or me at (312) 886-7449.

Sincerely yours,

Arthur S. Kawatachi

Arthur S. Kawatachi
Regional Project Officer

Enclosure

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.

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

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Richard Volk
Fulton Industries, Inc.
135 E. Linfoot
Wauseon, OH 43567

RE: Interim Status Acknowledgement USEPA ID No. OHD094810736
FACILITY NAME: Fulton Industries, Inc.

Dear Mr. Volk:

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

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

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

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

Sincerely yours,

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

Enclosure

FULTON INDUSTRIES INC. 135 East Linfoot Street, Wauseon, Ohio 43567-0377
Post Office Box 377 Phone 419-335-3015

FULTON

October 25, 1990

U.S.E.P.A.
Region 5
230South Dearborn St.
Chicago, Il. 60604
Attn: Ms. Babara Russell

Dear Ms. Russell,

We are submitting a sample of the notification/certification form that accompanys our manifests with each shipment of F006 waste that we have treated and disposed of.

Please accept our apology for not submitting this sample before this date. We were under the impression that the matter was resolved with the OEPA.

If you should need additional information, please contact me at 419-335-3015.

Sincerely,

Tom Gleckler

Tom Gleckler
Finishing Manager
Fulton Ind, Inc.

A

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

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

EPA I.D. NUMBER ➤ OHD094810736 REACKNOWLEDGEMENT

FULTON INDUSTRIES INC
135 EAST LINFOOT
WAUSEON OH 43567

INSTALLATION ADDRESS ➤ 135 EAST LINFOOT
WAUSEON OH 43567

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

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

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

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

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

INSTALLATION'S EPA I.D. NO.	~~OHD004372076~~ OHD094810736
I. NAME OF INSTALLATION	~~CHROMALLOY AMERICAN CORPORATIN~~
II. INSTALLATION MAILING ADDRESS	~~125~~ 135 LINFOOT ST WAUSEON, OH 43567
III. LOCATION OF INSTALLATION	~~125~~ 135 LINFOOT ST WAUSEON, OH 43567

000523 AUG 12 80

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F OHD094810736 T/A 1	A	800812

I. NAME OF INSTALLATION

FULTON INDUSTRIES, INC.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 135 EAST LINFOOT

CITY OR TOWN	ST.	ZIP CODE
WAUSEON	OH	43567

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 135 EAST LINFOOT

CITY OR TOWN	ST.	ZIP CODE
WAUSEON	OH	43567

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
MACLEOD, RICHARD VP	419-335-3015

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: YMCV

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

F = FEDERAL
M = NON-FEDERAL

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

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

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

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

VIII. FIRST OR SUBSEQUENT NOTIFICATION

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

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

C. INSTALLATION'S EPA I.D. NO.: ~~OHD004372076~~ OHD094810736

IX. DESCRIPTION OF HAZARDOUS WASTES

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

AUG 12 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S/W														T/A	C
0	N	D	0	9	4	8	1	0	7	3	6	5	2		1
1	2												13	14	15

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

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

1: F006	2:	3:	4:	5:	6:
7:	8:	9:	10:	11:	12:

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

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

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

31: P098	32: P104	33: P106	34:	35:	36:
37:	38:	39:	40:	41:	42:
43:	44:	45:	46:	47:	48:

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

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

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

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

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

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
R.H. MacLeod	R.H. MACLEOD V.P.	8/8/80

DETACH

FULTON INDUSTRIES INC. 135 East Linfoot Street, Wauseon, Ohio 43567 419-335-3015

485

FULTON

October 15, 1980

Mr. Y. J. Kim
EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Dear Mr. Kim:

Enclosed is our application for a storage facility. Even though we are temporarily storing the material, I understand that we should legally apply for the necessary license.

Our situation is as follows. We have built and are operating a water treatment plant for our plating operation. This plant treats the water such that the local Wauseon sewer system can accept it. In the treatment process, we develop a clay-like substance which consists of the materials we are precipitating from the water. For the last year and one-half we have been taking this material to the Fulton County Ohio landfill. This landfill was closed four months ago, and the new Fulton County landfill is not yet in operation. In this interim, we have been placing our sludge in the property that we own to the rear of our plant.

It is our intent when the new landfill opens up to remove this material to the landfill and continue our previous operation of periodically hauling our material to an approved disposition site.

I trust I have filled out the necessary paperwork properly. If you have any questions, please do not hesitate to call.

Sincerely,

FULTON INDUSTRIES, INC.

R. H. MacLeod
Vice President - Operations

mam

Enclosure

OCT 15 1980

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

Form Approved OMB No. 158-R0175 485

FORM 1 GENERAL

EPA

U.S. IRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S		T/A	C
F	OHD0948107362		D
1	2 - 13	14	15

LABEL ITEMS

A I.D. NUMBER

FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

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

II. POLLUTANT CHARACTERISTICS

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

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
	16	17	18		19	20	21
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
	22	23	24		25	26	27
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
	28	29	30		31	32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
	34	35	36		37	38	39
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X		J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
	40	41	42		43	44	45

III. NAME OF FACILITY

C 1 SKIP FULTON INDUSTRIES, INC.

15 16 - 29 30 - 69

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
C 2 MACLEOD, RICHARD V.P.	419	335	3015
15 16 - 45	46 - 48	49 - 51	52 - 55

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

C 3 135 E. LINFOOT

15 16 - 45

B. CITY OR TOWN	C. STATE	D. ZIP CODE
C 4 WAUSEON	OH	43567
15 16 - 40	41 42	47 - 51

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

C 5 135 E. LINFOOT

15 16 - 45

B. COUNTY NAME

ULTON

46 - 70

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
C 6 WAUSEON	OH	43567	
15 16 - 40	41 42	47 - 51	52 - 54

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CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

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

A. FIRST	B. SECOND
3465 *(specify)* Auto stampings	3469 *(specify)* Metal stampings
C. THIRD	**D. FOURTH**
3648 *(specify)* Lighting equipment	3471 *(specify)* Plating and polishing

VIII. OPERATOR INFORMATION

A. NAME: FULTON INDUSTRIES, INC.

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

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC *(other than federal or state)*
O = OTHER *(specify)*

Answer: P *(specify)*

D. PHONE *(area code & no.)*: 419 335 3015

E. STREET OR P.O. BOX: 135 E. LINFOOT

F. CITY OR TOWN: WAUSEON

G. STATE: OH

H. ZIP CODE: 43567

IX. INDIAN LAND

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

X. EXISTING ENVIRONMENTAL PERMITS

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

XI. MAP

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

XII. NATURE OF BUSINESS *(provide a brief description)*

Stamping and plating operation
Assembly of flashlights

XIII. CERTIFICATION *(see instructions)*

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

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED
R. H. MacLeod Vice President - Operations	R.H. MacLeod	10/15/80

COMMENTS FOR OFFICIAL USE ONLY

C

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

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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

I. EPA I.D. NUMBER

S F 1 2 - 13 T/A 14 C 1 15

FOR OFFICIAL USE ONLY

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

II. FIRST OR REVISED APPLICATION

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

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

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

C 8 15 — YR. 3 9 (73 74) — MO. 0 1 (75 76) — DAY 0 1 (77 78) — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

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

YR. (73 74) — MO. (75 76) — DAY (77 78) — FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

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

[ ] 72 **1. FACILITY HAS INTERIM STATUS**

[ ] 72 **2. FACILITY HAS A RCRA PERMIT**

III. PROCESSES – CODES AND DESIGN CAPACITIES

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

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

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

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

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

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

S C 1 — DUP — T/A C 1 (13 14 15)

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 3	10,000	Y	
3				
4				

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

CONTINUE ON REVERSE

Continued from the front.

III. PROCESSES *(continued)*

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

IV. DESCRIPTION OF HAZARDOUS WASTES

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

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

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

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

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

D. PROCESSES

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

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

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

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

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

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

CONTINUE ON PAGE 3

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

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

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

S F | T/A | C 6

V. FACILITY DRAWING

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

VI. PHOTOGRAPHS

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

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
41 33 37	84 08 35

VIII. FACILITY OWNER

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

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

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

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

IX. OWNER CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
R. H. MacLeod Vice President - Operations	R H MacLeod	10/15/80

X. OPERATOR CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
R. H. MacLeod Vice President - Operations	R H MacLeod	10/15/80

CONTINUE ON PAGE 5

Continued from page 2.

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

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485

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

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F006	25 cubic yards	Y	S03	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

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(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

CONTINUE ON REVERSE

Continued from page 4.

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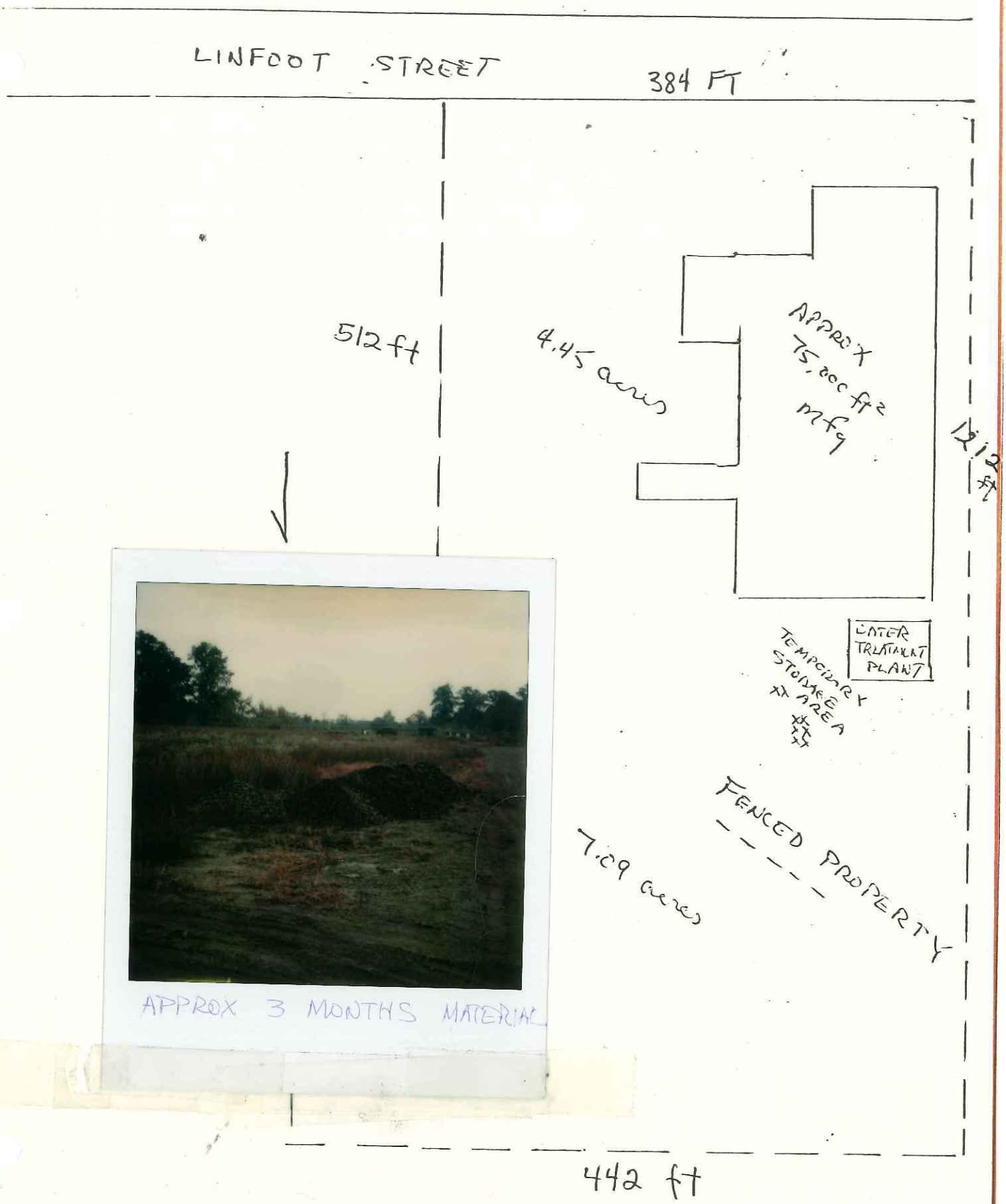
V. FACILITY DRAWING (see page 4)



OCT 15 1980

Continued from page 4.

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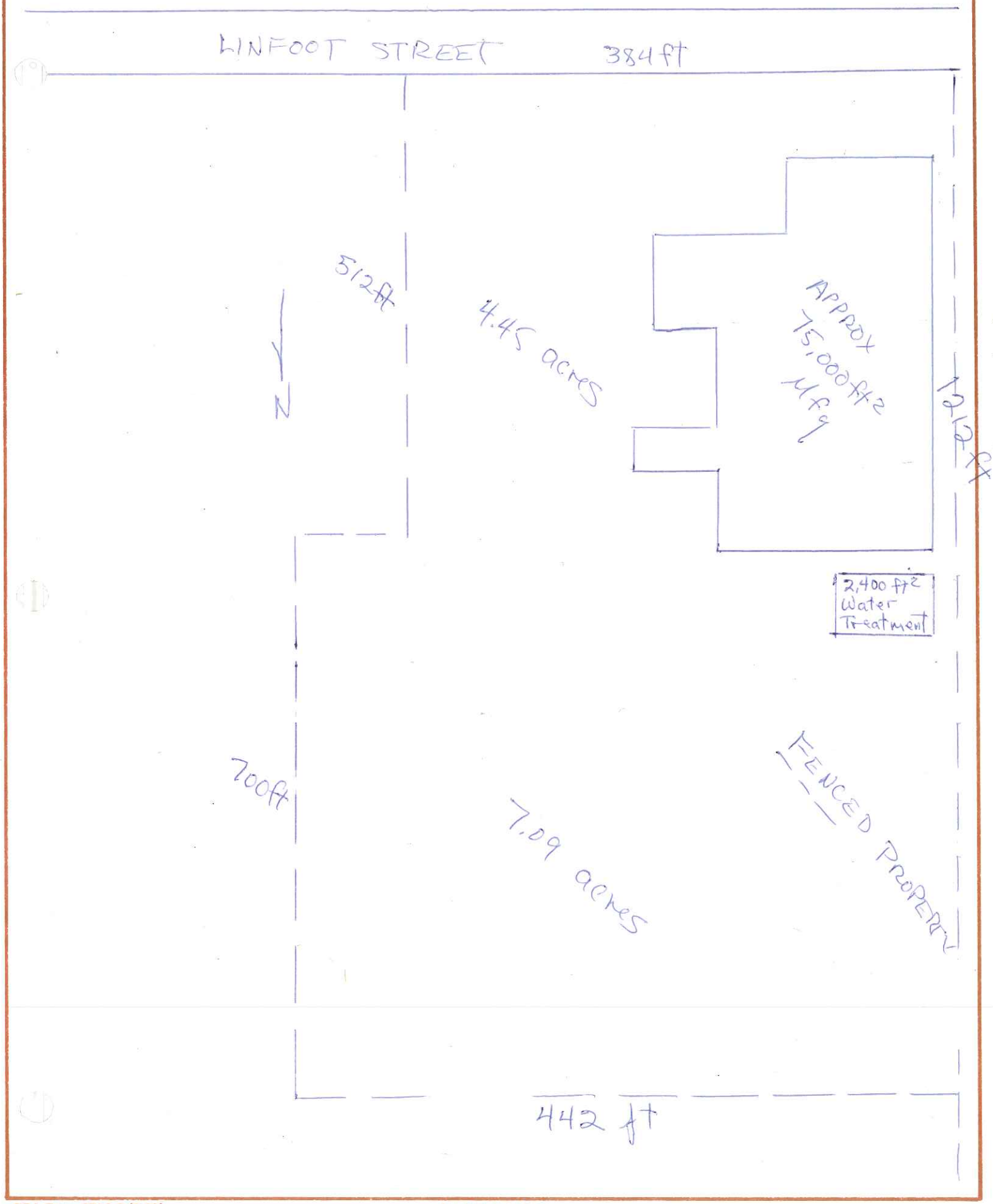
V. FACILITY DRAWING (see page 4)



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

Form Approved OMB No. 158-R0175 571

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

EPA I.D. NUMBER: F OHD094810736 (T/A: D)

GENERAL INSTRUCTIONS

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

LABEL ITEMS

I. EPA I.D. NUMBER	~~OHD000375076~~
II. FACILITY NAME	FULTON INDUSTRIES, INC. ~~CHROMALLOY AMERICAN CORPORATION~~
V. FACILITY MAILING ADDRESS	125 LINFOOT ST WAUSEON, OH 43567
VI. FACILITY LOCATION	125 LINFOOT ST WAUSEON, OH 43567

II. POLLUTANT CHARACTERISTICS

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

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

III. NAME OF FACILITY

1 SKIP FULTON INDUSTRIES, INC.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 VOLK, RICHARD ~~MACLEOD RICHARD~~ V.P.	419 335 3015

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 135 E LINFOOT

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 WAUSEON	OH	43567

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 135 E. LINFOOT

B. COUNTY NAME: FULTON

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 WAUSEON	OH	43567	

RECEIVED 10/30/81

EPA Form 3510-1 (6-80)

NOV 18 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

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

A. FIRST	B. SECOND
3465 (specify) AUTO STAMPINGS	3469 (specify) METAL STAMPING

C. THIRD	D. FOURTH
3648 (specify) LIGHTING EQUIPMENT	3471 (specify) PLATING & POLISHING

VIII. OPERATOR INFORMATION

A. NAME: FULTON INDUSTRIES, INC.

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

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

Answer: P (specify)

D. PHONE (area code & no.): 419 335 3015

E. STREET OR P.O. BOX: 135 E. LINFOOT

F. CITY OR TOWN: WAUSEON

G. STATE: OH

H. ZIP CODE: 43567

IX. INDIAN LAND

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

X. EXISTING ENVIRONMENTAL PERMITS

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

XI. MAP

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

XII. NATURE OF BUSINESS (provide a brief description)

STAMPING & PLATING OPERATION
ASSEMBLY OF FLASHLIGHTS

XIII. CERTIFICATION (see instructions)

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

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
R. H. MACLEOD V.P. OPERATIONS	R H MacLeod	Nov 18, 198

COMMENTS FOR OFFICIAL USE ONLY

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

Form Approved OMB No. 158-S80004

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FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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

I. EPA I.D. NUMBER

S F | T/A | C 1

FOR OFFICIAL USE ONLY

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

II. FIRST OR REVISED APPLICATION

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

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

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

C 8 (15) — YR. 39 (73 74) — MO. 01 (75 76) — DAY 01 (77 78)

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

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

YR. (73 74) — MO. (75 76) — DAY (77 78)

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

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

[ ] 1. FACILITY HAS INTERIM STATUS (72)

[ ] 2. FACILITY HAS A RCRA PERMIT (72)

III. PROCESSES – CODES AND DESIGN CAPACITIES

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

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

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

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

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

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

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

S C | DUP | T/A | C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	T 0 1	150,000	U		7				
2					8				
3					9				
4					10				

RECEIVED 10/30/81

Continued from the front.

III. PROCESSES *(continued)*

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

IV. DESCRIPTION OF HAZARDOUS WASTES

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

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

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

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

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

D. PROCESSES

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

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

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

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

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

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

CONTINUE ON PAGE 3

Continued from page 2.

NOTE: Photocopy this page before completing if you [illegible] more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
S W 1 2 - 13 T/A C 14 15: 1	S W 1 2 - 13 T/A C 14 15: 2 DUP 23 - 26 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code) 23 - 26	B. ESTIMATED ANNUAL QUANTITY OF WASTE 27 - 35	C. UNIT OF MEASURE (enter code) 36	D. PROCESSES 1. PROCESS CODES (enter) 27 - 29	27 - 29	27 - 29	27 - 29	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P030	5730	P	T01				
2	P029	600	P	T01				
3	P088	300	P	T01				
4	P104	30	P	T01				
5	P106	4800	P	T01				
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
[illegible]								
26								

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

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

EPA I.D. NO. *(enter from page 1)*	T/A	C
F		6

V. FACILITY DRAWING

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

VI. PHOTOGRAPHS

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

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
41 33 37	84 08 35

VIII. FACILITY OWNER

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

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

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

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

IX. OWNER CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
R.H. MACLEOD V.P. OPERATIONS	R.H. MacLeod	11/18/80

X. OPERATOR CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
R.H. MACLEOD V.P. OPERATIONS	R.H. MacLeod	11/18/80

CONTINUE ON PAGE 5

FULTON INDUSTRIES INC. 135 East Linfoot Street, Wauseon, Ohio 43567 419-335-3015

57

FULTON

November 18, 1980

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Gentlemen:

Enclosed is our application for a permit for hazardous waste activity. We understand that such a permit may eventually be given by rule and that the original intent of the regulations was not to require a permit for a pretreatment system discharging to a sewer. However, we have been advised to apply at this time.

Yours very truly,

FULTON INDUSTRIES, INC.

R. H. MacLeod
Vice President - Operations

mam

Enclosure

A.4 Closure/ Post-Closure

EASTMAN & SMITH
ATTORNEYS AT LAW
800 UNITED SAVINGS BUILDING
TOLEDO, OHIO 43604-1141

TELEPHONE (419) 241-6000
TELECOPIER (419) 241-5568

July 8, 1986

Mr. Robert E. Swale
RCRA Activities
U.S. EPA Region V
P. O. Box 3587A
Chicago, IL 60690-3587

RE: Fulton Industries, Inc.
Our File No: F075/13581

OHD094810736 C,TR,TSD, PA

Dear Mr. Swale:

Pursuant to your telephone request, enclosed please find a copy of the closure plan for Fulton Industries, Inc. which has been approved by Ohio EPA. We have also enclosed a copy of the certification of closure from Bowser Morner.

We look forward to hearing from you regarding this matter. If you have any questions or if we may be of assistance, please do not hesitate to contact the undersigned.

Very truly yours,

EASTMAN & SMITH

R T Sargeant

Richard T. Sargeant

RTS/bmm
Enclosure
cc: Mr. Richard N. Cheney

FULTON INDUSTRIES INC. 135 East Linfoot Street, Wauseon, Ohio 43567-0377
Post Office Box 377 Phone 419-335-3015

FULTON

January 8, 1986

Ohio EPA
P.O. Box 1049
361 East Broad Street
Columbus,Ohio 43266-0149
ATTN: Thomas E. Crepeau, Manager

Subject: Your letter dated December 12, 1985 regarding "Corrective Action/Closure; Facility Name: Fulton Industries; US EPA ID No.: OHD094810736; Ohio Permit No.: N/A

Dear Mr. Crepeau:

With regard to our closure plan, an analysis of soil samples taken at our plant indicate that it will be necessary to perform some additional excavation of contaminated soil, in order to meet closure criteria. As soon as weather permits, it would be our intent to determine the depth of the contamination; excavate the contaminated soil and re-submit sample data under our existing closure plan. (Revised 10/17/85)

In addition, we are retaining the certification statement that you requested; pending a response to our request for information from Dave Ferguson, NWDO.

If we can provide any additional information, please let us know.

Sincerely,

Richard N. Cheney

Richard N. Cheney
Vice President Mfg.

RNC/db

cc: Dave Ferguson, NWDO
Data Management Section, Columbus, Ohio

Fulton Co.

EASTMAN & SMITH
ATTORNEYS AT LAW
800 UNITED SAVINGS BUILDING
TOLEDO, OHIO 43604-1141

TELEPHONE (419) 241-6000
TELECOPIER (419) 241-5568

JAMILLE G. JAMRA
FRANK E. KANE
RICHARD E. ANTONINI
FREDERIC E. WOLF
M. DONALD CARMIN
FRANK D. JACOBS
PATRICK J. JOHNSON
JAMES F. NOONEY
BRUCE L. SMITH
MORTON BOBOWICK
DAVID M. JONES
HENRY N. HEUERMAN
JOHN T. LANDWEHR
DAVID L. KUHL
RICHARD T. SARGEANT
KENNETH C. BAKER
ROBERT J. GILMER, JR.
PETER R. CASEY III
DAVID F. COOPER
RUDOLPH A. PECKINPAUGH, JR.

DONALD E. THEIS
BARRY W. FISSEL
THOMAS A. DIXON
THERESE V. KAURICH
JOHN D. WILLEY, JR.
MARTIN S. HALL
RICHARD L. BERRY, JR.
GARY M. HARDEN
JUDITH K. RUUD
JOSEPH A. GREGG
STEPHEN R. SERRAINO
RONALD J. TICE
JOHN J. McGOWAN, JR.
STEVEN D. REINBOLT
STUART J. GOLDBERG
THOMAS J. GIBNEY

JOHN R. EASTMAN
HOWARD M. FRIEDMAN
OF COUNSEL

MELVIN R. BERGMAN
RETIRED

March 17, 1986

Ohio Environmental Protection Agency
Division of Solid & Hazardous Waste Management
P. O. Box 1049
Columbus, OH 43266-1049

RECEIVED
OHIO EPA
MAR 18 1986
DIV. of SOLID & HAZ. WASTE MGT

ATTN: Data Management Section

RE: Fulton Industries, Inc.
Our File No: F075/13581

Gentlemen:

We represent Fulton Industries, Inc. (hereinafter "Fulton") located in Wauseon, Ohio, which received your letter dated January 30, 1986, requesting information relating to corrective action for releases of hazardous waste or waste constituents from solid waste management units. For the reasons outlined below, it appears that Fulton should not have been sent the above described letter. Nevertheless, the company submits the following information relating to your request.

After discussions with company officials and its consultant, we understand the following to describe the situation and events at Fulton's Wauseon facility. In 1980, Fulton had on its premises a small pile of electroplating sludge. (With the exception of an industrial wastewater treatment unit permitted pursuant to the Ohio NPDES program, the facility does not have other types of solid waste management units.) At the suggestion of the EPA, the company submitted to the U.S. EPA an application for a Part A TSD permit. The facility has not been operated as a TSD, and no Ohio hazardous waste TSD permit was applied for or issued. The company is a manufacturing concern; it did not consider itself to be a hazardous waste TSD. It is not "seeking a permit" under subtitle C of the Resource Conservation Recovery Act of 1976.

There are no "regulated units" on Fulton's premises. No waste was deposited on the pile after July 26, 1982. In fact, the entire pile was removed and disposed of in a licensed commercial hazardous waste disposal facility prior to that date.

On several occasions plant personnel have inquired of Region V officials regarding how to have Fulton removed from EPA's list of TSD facilities. Each time the company has received a promise that EPA would get back to Fulton with the necessary information, but that information was never received.

Fulton officials also met with Ohio EPA and, on July 18, 1985, submitted a closure plan. During the fall of 1985, it was revised in accordance with the Ohio EPA's suggestions, and was ultimately approved.

Fulton has interviewed certain long-standing employees, performed field analyses and has consequently identified two areas on the premises which appear to have been affected by electroplating sludge from the facility. The company will remove all contaminated soil this spring when the ground unfreezes. The removal work will be performed pursuant to the closure plan and will be properly supervised by an independent professional engineer. The material which is removed will be processed through Ohio's waste product review program and, if approved by Ohio EPA, is expected to be disposed of in a permitted Ohio RCRA landfill.

If you have any questions or if we may be of assistance, please do not hesitate to contact the undersigned.

Very truly yours,

EASTMAN & SMITH

Richard T. Sargeant

RTS/bmm
cc: Mr. David Ferguson

OhioEPA
State Of Ohio Environmental Protection Agency
P. O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049
(614) 466-8565

Richard F. Celeste, Governor

RECEIVED
JUN 18 1986
U.S. EPA, REGION V

CERTIFIED MAIL

June 13, 1986

Re: CLOSURE PLAN, FULTON INDUSTRIES
OHD094810736

RECEIVED
JUN 17 1986
SOLID WASTE BRANCH
U.S. EPA, REGION V

Richard Cheney
Fulton Industries, Inc.
135 E. Linfoot Street
Wauseon, Ohio 43567

Mr. Cheney:

On July 21, 1985, Fulton Industries, Inc., submitted to Ohio EPA a closure plan for its hazardous waste storage pile located at 135 E. Linfoot Street, Wauseon, Ohio. Revisions to this closure plan were received on October 23, 1985. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Fulton Industries' proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

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

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

The closure plan submitted to Ohio EPA by Fulton Industries is hereby approved.

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

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

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

By: Vivian Davis Date 6/13/86

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JUN 13 1986

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

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas E. Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049.

Warren W. Tyler

DF/ara

cc: Tom Crepeau, DSHWM
Tom Carlisle, DSHWM
George Hamper, USEPA, Region V
Rebecca Strom, USEPA, Region V
Dave Ferguson, NWDO, Ohio EPA

1370U

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JUN 13 1986

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

By: Vivian Davis Date 6/13/86

OhioEPA

State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43266-0149
(614) 466-8565

December 12, 1985

Richard F. Celeste, Governor

Fulton Industries
Attn: Richard Cheney
135 E. Linfoot
Wausen, Ohio 43567

CERTIFIED MAIL

Dear Mr. Cheney:

Subject: Corrective Action/Closure; Facility Name: Fulton Industries;
US EPA ID No.: OHD094810736; Ohio Permit No.: N/A

As you are aware, Ohio EPA is currently evaluating your request for closure of your facility referenced above which is regulated under the Resource Conservation and Recovery Act (RCRA) and Ohio hazardous waste law.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, on behalf of USEPA, Ohio EPA must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it unsigned with a cover letter of explanation, within 30 days of the date of this letter. All submittals should be sent to: Ohio EPA, Division of Solid and Hazardous Waste Management, Attn: Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Please call Dave Ferguson, NWDO at (419) 352-8461 if you have any questions, or wish to discuss this matter further.

Very truly yours,

Thomas E. Crepeau

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

TEC/dhs

Enclosures

cc: Edith Ardiente/Rebecca Strom USEPA, Region V
Chris Bowers, DSHWM, Engineering Section
Ben Chambers/Dave Ferguson, NWDO

SHS-13

Richard H. Chaney
Fulton Industries, Incorporated
Post Office Box 377
135 East Linfoot Street
Wauseon, Ohio 43567-0377

RE: Closure Plan
Fulton Industries, Incorporated
OHD 004610726

Dear Mr. Chaney:

This is in reference to the closure plan that this office received on July 14, 1986 and the same being previously submitted to the Ohio Environmental Protection Agency (OEPA) on October 11, 1985. The plan concerned the closure of a waste storage pile containing (F006) electroplating wastes located at the above-referenced facility. The United States Environmental Protection Agency (U.S. EPA) has reviewed the plan and is providing comment.

The OEPA approved the plan conditionally in a letter dated June 12, 1986. The U.S. EPA is in concurrence with the OEPA's review and approval. U.S. EPA approves the closure plan with the conditions stipulated by OEPA. If you have any further questions, please contact Mr. Robert Swale of my staff at (312) 886-6571.

Sincerely,

Karl E. Bremer, Chief
Technical Programs Section

cc: Tony Tassone, OEPA
Tom Carlisle, OEPA-[illegible]
Tom Gregory, [illegible]
Bruce Hindley, [illegible]

bcc: Rebecca Stro[illegible]

SHS/Swale:ww

	INC.	AUTOL	IL CHIEF	IN CHIEF	MI CHIEF	[illegible]	OH	TPS	[illegible]	WMD DIR
INIT.	[illegible]	[illegible]					[illegible]	[illegible]		
DATE	7-17	7/17					7/17/86	7/21/86		

CYP 7/21/86

5HS-13

Richard N. Cheney
Fulton Industries, Incorporated
Post Office Box 377
135 East Linfoot Street
Wauseon, Ohio 43567-0377

RE: Closure Plan
Fulton Industries, Incorporated
OHD 094810736

Dear Mr. Cheney:

The United States Environmental Protection Agency (U.S. EPA) received a copy of the above referenced facility's closure plan on July 14, 1986. This plan was previously submitted to the Ohio Environmental Protection Agency (OEPA) on October 11, 1985. The plan concerned the closure of a waste storage pile containing (F006) electroplating wastes located at the facility.

The OEPA approved the plan conditionally in a letter dated June 13, 1986. The U.S. EPA concurs with the OEPA's review and approval with the conditions stipulated.

If you have any further questions, please contact Mr. Robert Swale of my staff, at (312) 886-6591.

Sincerely,

Karl E. Bremer, Chief
Technical Programs Section

cc: Tony Sassoon, OEPA
Tom Carlisle, OEPA-DSHWM
Tom Crepeau, OEPA-DSHWM
Bruce Middlo, OEPA-NWDO

bcc: Rebecca Strom

5HS/Swale:vw

	TYP	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	IPS CHIEF	WMB CHIEF	WMD DIR
DATE	7/22	7/16/86			Disk	#6				

OhioEPA

State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43266-0149
(614) 466-8565

December 12, 1985

Richard F. Celeste, Governor

Fulton Industries
Attn: Richard Cheney
135 E. Linfoot
Wausen, Ohio 43567

CERTIFIED MAIL

Dear Mr. Cheney:

Subject: Corrective Action/Closure; Facility Name: Fulton Industries;
US EPA ID No.: OHD094810736; Ohio Permit No.: N/A

As you are aware, Ohio EPA is currently evaluating your request for closure of your facility referenced above which is regulated under the Resource Conservation and Recovery Act (RCRA) and Ohio hazardous waste law.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, on behalf of USEPA, Ohio EPA must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it unsigned with a cover letter of explanation, within 30 days of the date of this letter. All submittals should be sent to: Ohio EPA, Division of Solid and Hazardous Waste Management, Attn: Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Please call Dave Ferguson, NWDO at (419) 352-8461 if you have any questions, or wish to discuss this matter further.

Very truly yours,

Thomas E. Crepeau

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

TEC/dhs

Enclosures

cc: Edith Ardiente/Rebecca Strom USEPA, Region V
Chris Bowers, DSHWM, Engineering Section
Ben Chambers/Dave Ferguson, NWDO

OhioEPA

Re: Fulton Industries/Closure
US EPA ID No.: OHD094810736
Ohio Permit No.: (NA)

October 25, 1985

RECEIVED
OCT 29 1985
SWB - AIS
U.S. EPA, REGION V

Richard Cheney
Fulton Industries
135 E. Linfoot
Wauseon, Ohio 43567

Dear Mr. Cheney:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for Fulton Industries in Wauseon, Ohio, will appear the week of October 27, 1985, in the Wauseon Republican. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, November 28, 1985.

Copies of the closure plan will be available for public review at the Wauseon Public Library, 117 East Elm Street in Wauseon and the Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio.

Please contact James F. Flautt at (614) 466-1578 if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau

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

TEC/jff

cc: Edith Ardiente, U.S. EPA, Region V
Rebecca Strom, U.S. EPA, Region V
Dave Ferguson, OEPA, NWDO

1013R

State of Ohio Environmental Protection Agency
361 East Broad St., Columbus, Ohio 43266-0149
(614) 466-8565

FULTON INDUSTRIES INC. 135 East Linfoot Street, Wauseon, Ohio 43567-0377
Post Office Box 377 Phone 419-335-3015

FULTON

October 18, 1985

Mr. Thomas Crepeau
Ohio EPA
P.O. Box 1049
Columbus, OH 43216-1049
(Route to Mr. Tom Carlisle)

Re: Closure Plan
Fulton Industries
Wauseon, Ohio

Gentlemen:

Fulton Industries has revised the closure plan which was previously submitted on July 18, 1985. Revisions have been made in accordance with the response received from Mr. Dave Ferguson of the Northwest District Office dated October 7, 1985.

Please review the attached plan. Fulton Industries is looking forward to the approval of this plan and will proceed with closure activities upon the receipt of such approval.

Yours truly,

FULTON INDUSTRIES

Richard M Cheney

Mr. Richard Cheney

Attachment

3-Mr. Tom Carlisle
1-Mr. Dave Ferguson
Ohio EPA Northwest
District Office
1035 Devlac Grove Drive
Bowling Green, OH 43402

RECEIVED
OHIO EPA
OCT 23 1985
DIV. of SOLID & HAZ. WASTE MGT.

CLOSURE CERTIFICATION PLAN

FULTON INDUSTRIES
WAUSEON, OHIO
JOB NO. 39321
(Revised 10/17/85)

INTRODUCTION:

Fulton Industries is a metal stamping manufacturer located in Wauseon, Ohio which performs some electroplating. The company generates electroplating waste, which is classified as EPA Hazardous Waste No. F-006. Over a period of about two years between 1980 and 1982, the company accumulated a waste pile of the electroplating waste on their property. In June, 1982 the company had Fondessy Enterprises completely remove the waste pile and a top layer of soil and dispose of it in a hazardous waste landfill.

The company is on file with the USEPA and Ohio EPA as having been a hazardous waste storage facility. The company has never held a storage facility permit, however, the agencies have recently requested that Fulton Industries formally document and certify the closure of the waste pile.

The following closure plan details the steps to be taken to document and certify the closure. The plan has been prepared in substantial accordance with 40CFR 265.111 and 265.112 inasmuch as is possible given that this documentation is to occur after the actual removal of the stored waste material and after termination of the use as a storage facility.

CLOSURE PLAN:

Fulton Industries generates electroplating waste classified as being hazardous waste No. F-006. The waste also has exhibited the EP toxicity

BOWSER MORNER

characteristic. Over a period of approximately two years, ending in 1982, the industry accumulated a waste pile of electroplating sludge covering an area approximately 20 feet by 24 feet or a total area of approximately 500 square feet. The attached plan titled "Former Location of Waste Pile" shows the area. The maximum volume of the pile and some underlying and surrounding soil which was removed and transported to a hazardous waste facility by Fondessy Enterprises in 1982 was approximately 120 cubic yards. Since then, the industry has not accumulated the waste on-site and has been strictly a generator.

The hazardous waste regulations list cadmium, hexavalent chromium, nickel, and cyanide as the basis for listing electroplating wastes (F-006) as hazardous. Fondessy was able to provide EP toxicity results for the waste which are listed in Table 1. As may be seen, cadmium and chromium exceed the limits. Therefore, the soil samples will be analyzed for cadmium, chromium, nickel, and cyanide. All analyses will be for total concentrations in the soil.

As stated above, all stored wastes were previously removed from the site and disposed in an environmentally sound manner. The industry, at this time, wishes to complete the closure including certification. The following items will be performed to accomplish certification:

1. Four background soil samples and four soil samples from within the previous waste pile area will be obtained. The background samples will be taken from randomly selected locations within unaffected areas on the plant property. The waste pile area will be divided into quadrants. One

sample will be obtained from a randomly selected location or locations within each quadrant. All sampling locations will be recorded. Randomly selected locations will be selected arbitrarily by the sampler; a grid and random number techniques will not be utilized. Samples will be taken with an open tubular sampler or other applicable method to represent the 0-12 inch depth interval. If necessary because of volume requirements for analysis, multiple subsamples will be composited. Samples will be placed in labeled laboratory containers.

2. Samples will be transferred to a laboratory for analysis. Chain-of-custody procedures will be followed. Each sample will be analyzed for:

   Cyanide (total)

   Cadmium (total)

   Chromium (total)

   Nickel (total)

   All analyses will be in accordance with SW-846 methods. The laboratory will be required to maintain QA/QC procedures.

3. Analytical results will be analyzed with the Student's t-test at a level of significance of 0.01. Each of the quadrant results will be compared statistically to the background results. If the quadrant result is statistically greater than the background data, the owner will have the option of obtaining another sample of soil from the quadrant and having the resample analyzed. The statistical test will be used to evaluate the resample result. If both sample and resample are statistically greater

than background, the closure plan will be revised and resubmitted to Ohio EPA.

4. If no quadrant results are statistically greater than background, the results of the closure activities will be summarized in a certification report by a registered professional engineer. The owner will also certify that the facility was closed in accordance with this closure plan.

The sampling and analytical work will be initiated upon approval of this plan by the Ohio EPA. It is expected that the work will take approximately 1 to 2 months.

The Ohio EPA Northwest District Office will be notified a minimum of two days prior to the beginning of the sampling work.

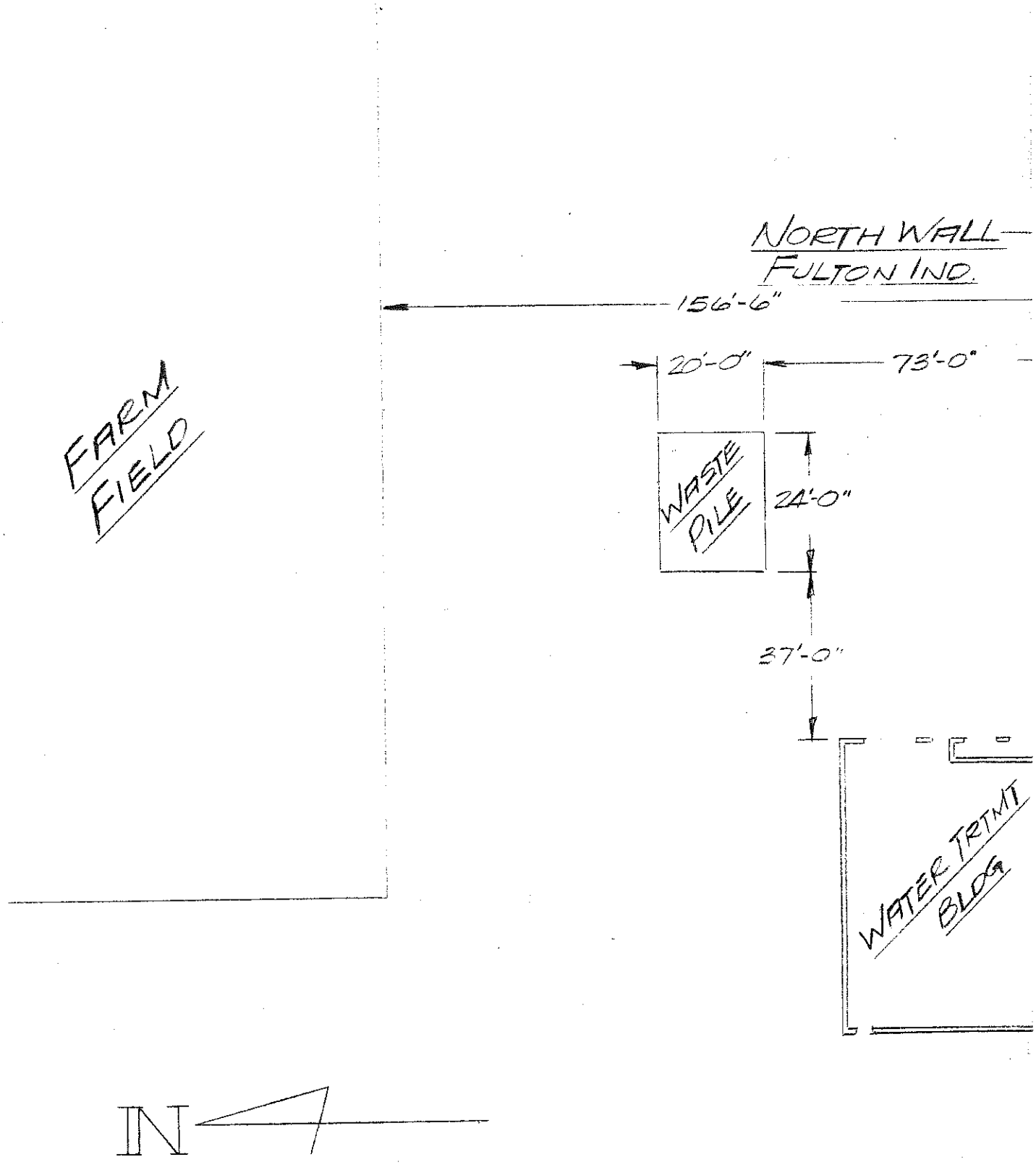
Upon successful completion of the closure work, a certification report will be provided by a registered professional engineer stating that the closure was completed in substantial accordance with this closure plan. A plan showing the facility and the boring locations will be included. Analytical results will also be included.

TABLE 1

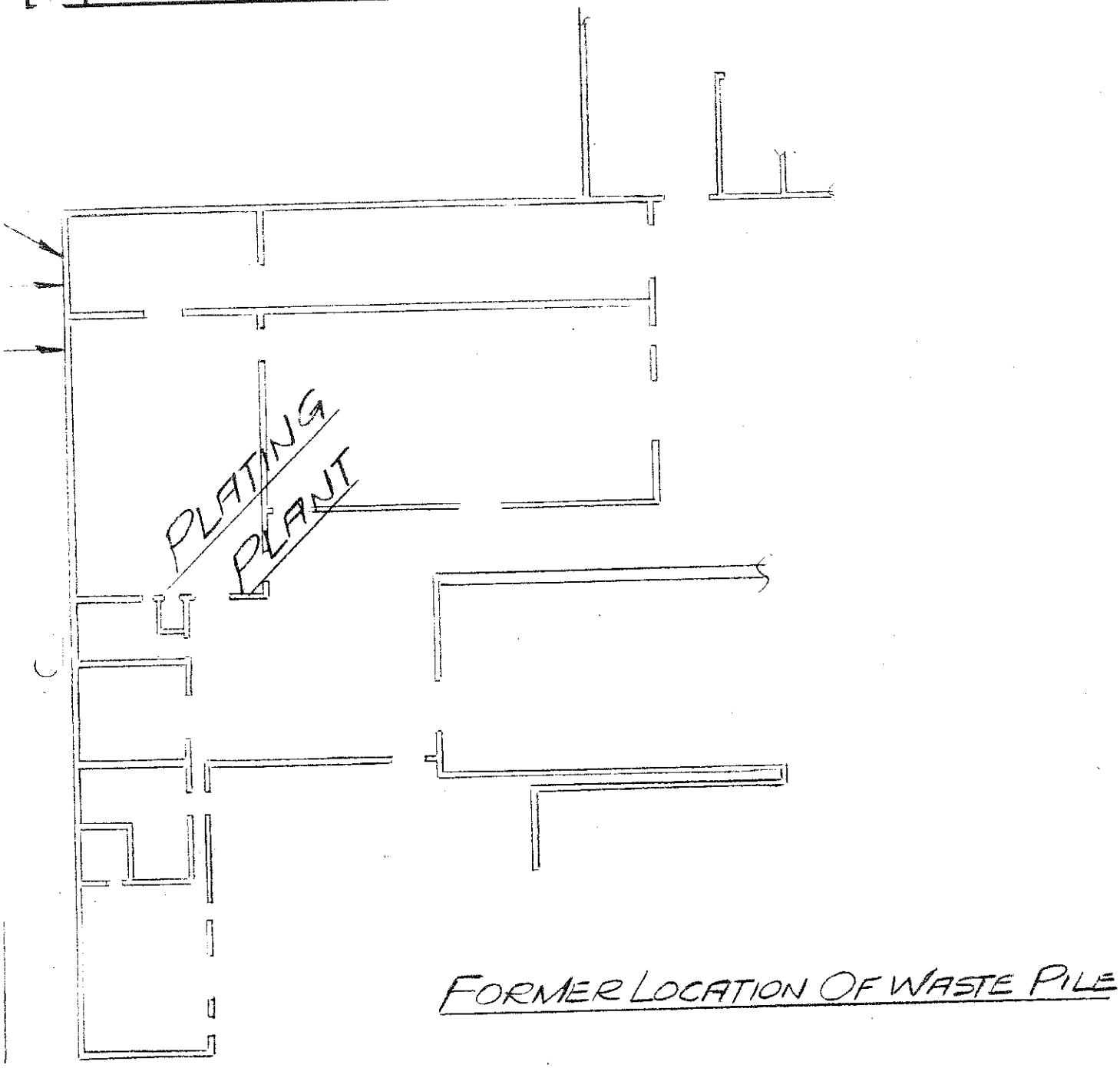
EP TOXICITY TEST RESULTS

Metal	Waste Concentration (mg/l)	EPA Limit (mg/l)
Arsenic	0.005	5.0
Barium	0.3	100.0
Cadmium	74	1.0
Chromium	24 (hexavalent)	5.0
Lead	0.054	5.0
Mercury	0.0002	0.2
Selenium	0.004	1.0
Silver	0.002	5.0

BOWSER MORNER



LET.	REVISIONS	DATE	LET.	REVISIONS	DATE



OPERATIONS	UNLESS OTHERWISE SPECIFIED	FULTON INDUSTRIES INC.
	DEC. ± FRACT. ±	WAUSEON, OHIO
	MAT'L:	DR: HRS SCALE: 1" = 30'-0"
	HARDNESS	CK: PHILIPS DATE: 10-11-85
	R. LG: WIDTH:	CUST. NO.:
	STRT'G GAGE:	NAME:
	STOCK NO:	PART NO.:

OhioEPA

May 24, 1985

Mr. Daniel J. Banaszek
U.S. Environmental Protection Agency
Region V
Solid Waste Branch 5HW-13
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Banaszek:

I have contacted our district office staff regarding the withdrawal/closure status of the facilities described in your letter of January 10, 1985. The discussion below and the attached information provide appropriate historical information. Our opinions as to the facilities current status and our plans for dealing with the facility in the future are also included.

Doherty Sanitary Landfill in Geneva, Ohio (OHD052316056). Doherty Landfill notified and filed a Part A solely due to the fact that they accept asbestos (formerly U013). They do not accept and have not accepted other hazardous waste. Any previous representations to the contrary were due to a lack of understanding of the regulations. This is a protective filer; no closure required. (See attached memo).

Chemical Leaman Tank Lines in Ross, Ohio (OHD046618914) is a more complex case. The Ohio EPA involvement with this facility goes back many years. It had always been a facility of concern to our industrial wastewater and groundwater staff. For a long time we were not sure, nor was Chemical Leaman or U.S. EPA, exactly how the hazardous waste regulations applied to the facility. As a result Chemical Leaman filed a Part A with U.S. EPA and initially they applied for a state permit. It was then determined that the waste in the surface impoundment was not hazardous waste even though it was derived from hazardous materials. The impoundment was removed from service pursuant to a decommissioning plan which the DSHWM-Southwest District Office reviewed. All wastes generated were sent to hazardous waste TSD's since the wastes were highly contaminated. They currently operate as a generator storing in drums for less than 90 days. Chemical Leaman is conducting groundwater monitoring at the site on a quarterly basis as specified by our Southwest District Office.

It is my assumption that if any federal closure is necessary for this facility if could be handled via the expedited closure procedures used for storage facilities that have converted to less than 90 day storage. We do not intend to pursue any further formal closure. (Most of the Chemical Leaman correspondence should be in Region V files. Attached is a letter that speaks to the waste in the impoundment.)

State of Ohio Environmental Protection Agency
361 E. Broad St., Columbus, Ohio 43216-1049, (614) 466-8565

Simonds Cutting Tools in Newcomerstown, Ohio (OHD018321853). I have attached an extensive series of correspondence and a memo regarding this facility. The current status of the facility is a generator storing for less than 90 days. The impoundment was taken out of service pursuant to plans reviewed by our Southeast District Office. We may have erred in handling this informally since we lack a public noticed and Director approved plan. I am satisfied that the impoundment was closed in an environmentally sound manner, however, and that no further groundwater monitoring is necessary. There is some question as to whether or not the pickle liquor discharged to the impoundment was K062 or not but does appear that there was some hazardous waste in the impoundment. I don't think this is a candiate for expedited closure. If you want us to do so, we could do some sort of retroactive closure process to cleanup the administrative record for the federal system. Please let me know.

Morgan County Landfill in McConnelsville, Ohio (OHD000720243) received a hazardous waste stream from Gould Inc. that is a candidate for delisting (see the Federal Register February 26, 1985). Morgan County Landfill has conducted some groundwater monitoring at the facility but is probably not in full compliance with the absolute letter of the regulations. They are conducting an assessment. If the waste in the landfill is eventually delisted then Morgan County Landfill would not be a hazardous waste facility. Nonetheless, our Southeast District Office staff is of the opinion that the landfill should be closed for other reasons and has been pursuing closure as a solid waste disposal facility. A final decision on the Gould Inc. delisting should come this year. We would prefer to delay any formal action on the hazardous waste closure until the Gould delisting is decided. This would be our course of action as long as site monitoring data does not indicate that immediate action is necessary.

Fulton Industries Inc. in Wauseon, Ohio (OHD094810736). Fulton Industries will be inspected the week of May 27, 1985. I will provide a status report on that facility following the inspection.

Sincerely,

Tom Carlisle

Tom E. Carlisle, Manager
Technical Assistance & Waste Management Section
Division of Solid and Hazardous Waste Management

TEC/sc

Attachments

cc: Steve Hamlin, SEDO
Dave Wertz, NEDO
Don Marshall, SWDO
Ben Chambers, NWDO
Anthony Sasson, DSHWM

1000U(67-68)

FULTON INDUSTRIES INC. 135 East Linfoot Street, Wauseon, Ohio 43567 419-335-3015

FULTON

new

RECEIVED
JUN 17 1983
WASTE MANAGEMENT BRANCH
EPA, REGION V

June 14, 1983

CERTIFIED MAIL

Mr. William Miner
RCRA Activities
Attn: Financial Requirements
P.O. Box A3587
Chicago, IL 60690

OHD 094 810 736 PA, G, TRS, TSD, PAS)

Dear Mr. Miner:

Subject: Your letter dated June 2, 1983 requesting financial assurance for closure and liability coverage with regard to Fulton Industries, Inc., EPA I.D. No. OHD 094810736, 135 East Linfoot St., Wauseon, Ohio 43567

We are a generator of hazardous waste (from our plating facility) and dispose of this waste through Fondessy Enterprises, Inc., 876 Otter Creek Rd., Oregon, Ohio 43616 (EPA I.D. Code No. OHD 045243706).

It is our understanding that, as a generator, we do not need the closure and liability coverage.

If we are in error, or have overlooked a requirement, we would appreciate your bringing that information to our attention.

Yours very truly,

FULTON INDUSTRIES, INC.

R. N. Cheney

R. N. Cheney
Vice President - Manufacturing

mam

RECEIVED

CLOSURE CERTIFICATION PLAN

FULTON INDUSTRIES
WAUSEON, OHIO
JOB NO. 39321
(Revised 10/17/85)

INTRODUCTION:

Fulton Industries is a metal stamping manufacturer located in Wauseon, Ohio which performs some electroplating. The company generates electroplating waste, which is classified as EPA Hazardous Waste No. F-006. Over a period of about two years between 1980 and 1982, the company accumulated a waste pile of the electroplating waste on their property. In June, 1982 the company had Fondessy Enterprises completely remove the waste pile and a top layer of soil and dispose of it in a hazardous waste landfill.

The company is on file with the USEPA and Ohio EPA as having been a hazardous waste storage facility. The company has never held a storage facility permit, however, the agencies have recently requested that Fulton Industries formally document and certify the closure of the waste pile.

The following closure plan details the steps to be taken to document and certify the closure. The plan has been prepared in substantial accordance with 40CFR 265.111 and 265.112 inasmuch as is possible given that this documentation is to occur after the actual removal of the stored waste material and after termination of the use as a storage facility.

CLOSURE PLAN:

Fulton Industries generates electroplating waste classified as being hazardous waste No. F-006. The waste also has exhibited the EP toxicity

characteristic. Over a period of approximately two years, ending in 1982, the industry accumulated a waste pile of electroplating sludge covering an area approximately 20 feet by 24 feet or a total area of approximately 500 square feet. The attached plan titled "Former Location of Waste Pile" shows the area. The maximum volume of the pile and some underlying and surrounding soil which was removed and transported to a hazardous waste facility by Fondessy Enterprises in 1982 was approximately 120 cubic yards. Since then, the industry has not accumulated the waste on-site and has been strictly a generator.

The hazardous waste regulations list cadmium, hexavalent chromium, nickel, and cyanide as the basis for listing electroplating wastes (F-006) as hazardous. Fondessy was able to provide EP toxicity results for the waste which are listed in Table 1. As may be seen, cadmium and chromium exceed the limits. Therefore, the soil samples will be analyzed for cadmium, chromium, nickel, and cyanide. All analyses will be for total concentrations in the soil.

As stated above, all stored wastes were previously removed from the site and disposed in an environmentally sound manner. The industry, at this time, wishes to complete the closure including certification. The following items will be performed to accomplish certification:

1. Four background soil samples and four soil samples from within the previous waste pile area will be obtained. The background samples will be taken from randomly selected locations within unaffected areas on the plant property. The waste pile area will be divided into quadrants. One

sample will be obtained from a randomly selected location or locations within each quadrant. All sampling locations will be recorded. Randomly selected locations will be selected arbitrarily by the sampler; a grid and random number techniques will not be utilized. Samples will be taken with an open tubular sampler or other applicable method to represent the 0-12 inch depth interval. If necessary because of volume requirements for analysis, multiple subsamples will be composited. Samples will be placed in labeled laboratory containers.

2. Samples will be transferred to a laboratory for analysis. Chain-of-custody procedures will be followed. Each sample will be analyzed for:

   Cyanide (total)
   Cadmium (total)
   Chromium (total)
   Nickel (total)

   All analyses will be in accordance with SW-846 methods. The laboratory will be required to maintain QA/QC procedures.

3. Analytical results will be analyzed with the Student's t-test at a level of significance of 0.01. Each of the quadrant results will be compared statistically to the background results. If the quadrant result is statistically greater than the background data, the owner will have the option of obtaining another sample of soil from the quadrant and having the resample analyzed. The statistical test will be used to evaluate the resample result. If both sample and resample are statistically greater

than background, the closure plan will be revised and resubmitted to Ohio EPA.

4. If no quadrant results are statistically greater than background, the results of the closure activities will be summarized in a certification report by a registered professional engineer. The owner will also certify that the facility was closed in accordance with this closure plan.

The sampling and analytical work will be initiated upon approval of this plan by the Ohio EPA. It is expected that the work will take approximately 1 to 2 months.

The Ohio EPA Northwest District Office will be notified a minimum of two days prior to the beginning of the sampling work.

Upon successful completion of the closure work, a certification report will be provided by a registered professional engineer stating that the closure was completed in substantial accordance with this closure plan. A plan showing the facility and the boring locations will be included. Analytical results will also be included.

TABLE 1

EP TOXICITY TEST RESULTS

Metal	Waste Concentration (mg/l)	EPA Limit (mg/l)
Arsenic	0.005	5.0
Barium	0.3	100.0
Cadmium	74	1.0
Chromium	24 (hexavalent)	5.0
Lead	0.054	5.0
Mercury	0.0002	0.2
Selenium	0.004	1.0
Silver	0.002	5.0

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FOUNDED 1911

THIS IS OUR 75th ANNIVERSARY THANKS TO YOU

CLOSURE OF WASTE PILE AREA

FULTON INDUSTRIES, WAUSEON, OHIO

CLOSURE OF WASTE PILE AREA

FULTON INDUSTRIES, WAUSEON, OHIO

Fulton Industries
P.O. Box 377
135 E. Linfoot Street
Wauseon, OH 43567-0377

Attention: Mr. Richard Cheney

Report No. 39321-586-074

June 2, 1986

BOWSER MORNER

BOWSER MORNER

FOUNDED 1911

122 S. St. Clair St. • P.O. Box 838 • Toledo, OH 43696-0838 • 419/255-8200

June 2, 1986

Fulton Industries
P.O. Box 377
135 E. Linfoot Street
Wauseon, OH 43567-0377

Attention: Mr. Richard Cheney

RE: Closure of Waste Pile Area
Fulton Industries
Wauseon, Ohio
Report No. 39321-586-074

Gentlemen:

Attached is our closure certification report for the previous waste pile facility at Fulton Industries in Wauseon, Ohio. The closure at the waste pile area has been accomplished in substantial accordance with the Closure Certification Plan (Revised 10-17-85).

STATE OF OHIO
GLENN L. FITKIN III
E-49728
REGISTERED
PROFESSIONAL ENGINEER

Respectfully submitted,

BOWSER-MORNER ASSOCIATES, INC.

Glenn L. Fitkin

Glenn L. Fitkin, P.E.
Civil/Environmental Engineer

GLF:jl(9)
3-Client
1-Mr. Richard T. Sargeant
Eastman and Smith

CLOSURE CERTIFICATION--FULTON INDUSTRIES--WAUSEON, OHIO

INTRODUCTION:

Fulton Industries submitted to Ohio EPA a Closure Certification Plan dated October 17, 1985, for their waste pile storage unit. The waste pile had been removed in 1982 and disposed of at a hazardous waste facility; however, Ohio EPA in 1985 requested that the closure of the facility be certified.

The closure plan stated that Fulton Industries would obtain background soil samples and soil samples from within the waste pile area and analyze them for cyanide, cadmium, chromium, and nickel. The analytical results were to be evaluated using the Student's t-test at a level of significance of 0.01. To complete closure, none of the waste pile area soil samples could have concentrations of any of the inorganic constituents statistically exceeding background concentrations.

The following is a description of the closure activities which have occurred, and an evaluation and presentation of the analytical data.

WORK PERFORMED:

On November 25, 1985, soil samples were obtained at the Fulton Industries, Wauseon, Ohio, facility. Mr. David Ferguson of Ohio EPA was present. Four background soil samples and a sample from each of four quadrants of the waste pile area were obtained. Each sample was retrieved with an open tubular auger to represent the interval from the ground surface to a depth of 6-10 inches below the ground surface. Several subsamples were obtained to make up a complete sample at each sample location. All soil samples were placed directly into sample containers which were labeled and sealed.

The samples were transported to the BOWSER-MORNER laboratory for analysis. Total cyanide was determined according to Standard Methods for the Examination of Water and Waste Water, 16th Edition, since an applicable method is not contained in the U.S. EPA SW846 document. Cadmium, chromium, and nickel were determined according to "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods," SW846, U.S. EPA, Office of Solid Waste. Test results are presented in Laboratory Report R112915, dated December 26, 1985. The Laboratory Report and a sample location plan are included in Attachment A.

Sample Nos. 1, 2, 3, and 4 were intended to be used as background samples. It was apparent, based on review of the data, that sample No. 1 contained elevated concentrations of some of the constituents. Based upon this, Fulton Industries performed an in-house investigation and determined that some contaminated soil and waste materials existed in areas outside of the waste pile area. The area in question was excavated with all excavated materials transported to and disposed of at Fondessy Landfill in Oregon, Ohio.

Samples 5, 6, 7, and 8 represented soil in the waste pile area and apparently contained elevated concentrations of the constituents.

Fulton Industries notified Ohio EPA of the results and their intention to excavate and dispose in a letter dated January 8, 1986.

After excavation of waste materials in the area of sample No. 1, additional samples were obtained by BOWSER-MORNER on March 25, 1986, in a manner similar to that described above. Analytical results are reported in BOWSER-MORNER Laboratory Report S032618, dated April 15, 1986. The report and sample locations are presented in Attachment A. Sample No. 1 and No. 2 were taken in the

excavated area. Sample No. 3 was a soil/waste material mixture that was observed adjacent to the excavated area, and sample No. 4 was a soil sample taken beneath the visually contaminated material. Sample Nos. 1 and 2 were evaluated statistically for certification of the closure as presented in the next section. Sample Nos. 3 and 4 were obtained for informational purposes only.

It was observed that apparent contaminated materials still existed adjacent to the excavated area. Fulton Industries initiated excavation and disposal of visually contaminated materials on April 30, 1986. BOWSER-MORNER personnel observed the excavation operations. Excavation was continued until all visible traces of apparent contamination were removed starting at the waste pile area and the aforementioned excavation and working outward.

On May 5, 1986, ten soil samples were obtained by BOWSER-MORNER. The test results are reported in Laboratory Report S050768, dated May 22, 1986. Sample locations and the limits of the excavated area are indicated on the plan which accompanies the Laboratory Report. Both the report and plan are included in Attachment A. Sample Nos. 1 and 2 were intended to represent background conditions. Sample Nos. 3, 4, 5, and 6 represent remaining soil in the excavated area outside of the waste pile area. They were taken at random locations. Sample Nos. 7, 8, 9, and 10 were taken within the waste pile area and represent remaining soil. All samples represent the upper 6"-10" of the remaining soil profile.

All of the soil samples were transported to the BOWSER-MORNER laboratory and analyzed according to the methods referenced above.

EVALUATION OF DATA:

Five soil samples were designated as background samples. The analytical results for the samples are summarized in Table 1 along with the mean and standard deviation for each of the four constituents. To facilitate utilization of the specified statistical method, values reported as being below the detection limit were considered to equal the detection limit.

The Student's t-test at a level of significance of 0.01 was used to evaluate the samples representing soil remaining after excavation of contaminated materials. The soil sample results were compared statistically to the background soil analytical results. Results of the statistical evaluation are presented in Table 2, Table 3, Table 4, and Table 5. A soil sample would be considered to have a concentration statistically greater than background if the t^* value exceeds the t_c value. As indicated in the tables, none of the sample results were found to statistically exceed background concentrations.

Certification

It is the opinion of BOWSER-MORNER, based upon field observations, the analytical results and the statistical evaluation, that the waste pile facility has been closed in substantial accordance with the Closure Certification Plan previously submitted to Ohio EPA.

Table 1

Fulton Industries--Wauseon, Ohio
Background Data

Laboratory Report Date	Sample No.	Cyanide (mg/kg)	Cadmium (mg/kg)	Chromium (mg/kg)	Nickel (mg/kg)
12-26-85	2	<0.5	<1	24	27
12-26-85	3	<0.5	<1	21	20
12-26-85	4	1.0	3	77	50
5-22-86	1	<0.5	<1	24	110
5-22-86	2	<0.5	<1	20	110
Mean:		0.6	1.4	33.2	63.4
Standard Deviation:		0.22	0.89	24.6	44.0

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Table 2

Fulton Industries--Wauseon, Ohio
Statistical Evaluation of Cyanide Data

Laboratory Report Date	Sample No.	CYANIDE Analytical Result (mg/kg)	t*	Significantly Greater Than Background
4-15-86	1	0.3	-1.244	No
4-15-86	2	0.2	-1.659	No
5-22-86	3	<0.5	-0.414	No
5-22-86	4	<0.5	-0.414	No
5-22-86	5	<0.5	-0.414	No
5-22-86	6	<0.5	-0.414	No
5-22-86	7	<0.5	-0.414	No
5-22-86	8	<0.5	-0.414	No
5-22-86	9	<0.5	-0.414	No
5-22-86	10	<0.5	-0.414	No

t_c (0.01,4) = 3.747

BOWSER MORNER

Table 3

Fulton Industries--Wauseon, Ohio
Statistical Evaluation of Cadmium Data

Laboratory Report Date	Sample No.	CADMIUM Analytical Result (mg/kg)	t*	Significantly Greater Than Background
4-15-86	1	<5	3.692	No
4-15-86	2	<5	3.692	No
5-22-86	3	<1	-0.410	No
5-22-86	4	<1	-0.410	No
5-22-86	5	1	-0.410	No
5-22-86	6	3	1.641	No
5-22-86	7	<1	-0.410	No
5-22-86	8	<1	-0.410	No
5-22-86	9	<1	-0.410	No
5-22-86	10	1	-0.410	No

t_c (0.01,4) = 3.747

BOWSER MORNER

Table 4

Fulton Industries--Wauseon, Ohio
Statistical Evaluation of Chromium Data

Laboratory Report Date	Sample No.	CHROMIUM Analytical Result (mg/kg)	t*	Significantly Greater Than Background
4-15-86	1	55	0.809	No
4-15-86	2	31	-0.082	No
5-22-86	3	20	-0.490	No
5-22-86	4	25	-0.304	No
5-22-86	5	27	-0.230	No
5-22-86	6	62	1.069	No
5-22-86	7	30	-0.119	No
5-22-86	8	28	-0.193	No
5-22-86	9	25	-0.304	No
5-2286	10	30	-0.119	No

t_c (0.01,4) = 3.747

BOWSER MORNER

Table 5

Fulton Industries--Wauseon, Ohio
Statistical Evaluation of Nickel Data

Laboratory Report Date	Sample No.	NICKEL Analytical Result (mg/kg)	t*	Significantly Greater Than Background
4-15-86	1	2	-1.274	No
4-15-86	2	5	-1.212	No
5-22-86	3	150	1.797	No
5-22-86	4	130	1.382	No
5-22-86	5	34	-0.610	No
5-22-86	6	42	-0.444	No
5-22-86	7	44	-0.403	No
5-22-86	8	34	-0.610	No
5-22-86	9	28	-0.734	No
5-22-86	10	54	-0.195	No

t_c (0.01,4) = 3.747

BOWSER MORNER

ATTACHMENT A

Analytical Results and Sample Locations

BOWSER-MORNER, INC.

CORPORATE: 420 Davis Ave. • P.O. Box 51 • Dayton, OH 45401 • 513/253-8805
TOLEDO DISTRICT: 122 S. St. Clair St. • P.O. Box 838 • Toledo, OH 43696 • 419/255-8200

LABORATORY REPORT

Report to: Fulton Industries
% BOWSER-MORNER, INC.
P. O. Box 838
Toledo, Ohio 43696
Attn: Mr. Glen Fitkin

Date: December 26, 1985
Laboratory No.: R112915
Authorization:

Report on: Eight (8) Soil Samples for Cyanide and Metals Analyses, Received November 29, 1985.

SAMPLE IDENTIFICATION:

The samples were identified as 1 through 8.

ANALYTICAL METHODS:

The cyanide analysis was performed in accordance with Standard Methods for the Examination of Water and Wastewater, 16th edition. The metals analyses were performed according to "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods," SW-846, U.S. EPA Office of Solid Waste.

QUALITY ASSURANCE:

Our analyses included certified quality control samples. The percent recoveries obtained in our analyses of these samples are reported in a section after the soil sample results.

TEST RSULTS:

A. Soil Samples Analyses:

Sample	Cyanide, mg/kg	Cadmium, mg/kg	Chromium, mg/kg	Nickel mg/kg
1	12.5	36	540	220
2	<0.5	<1	24	27
3	<0.5	<1	21	20
4	1.0	3	77	50
5	82.5	180	4700	1600
6	19.0	40	790	340
7	28.0	50	1100	480
8	42.0	77	1600	530

- Continued -

B. Quality Assurance Analyses:

Parameter	Percent Recovery
Cyanide	103
Cadmium	105
Chromium	98
Nickel	105

Respectfully Submitted,

BOWSER-MORNER, INC.

James M. Kemper

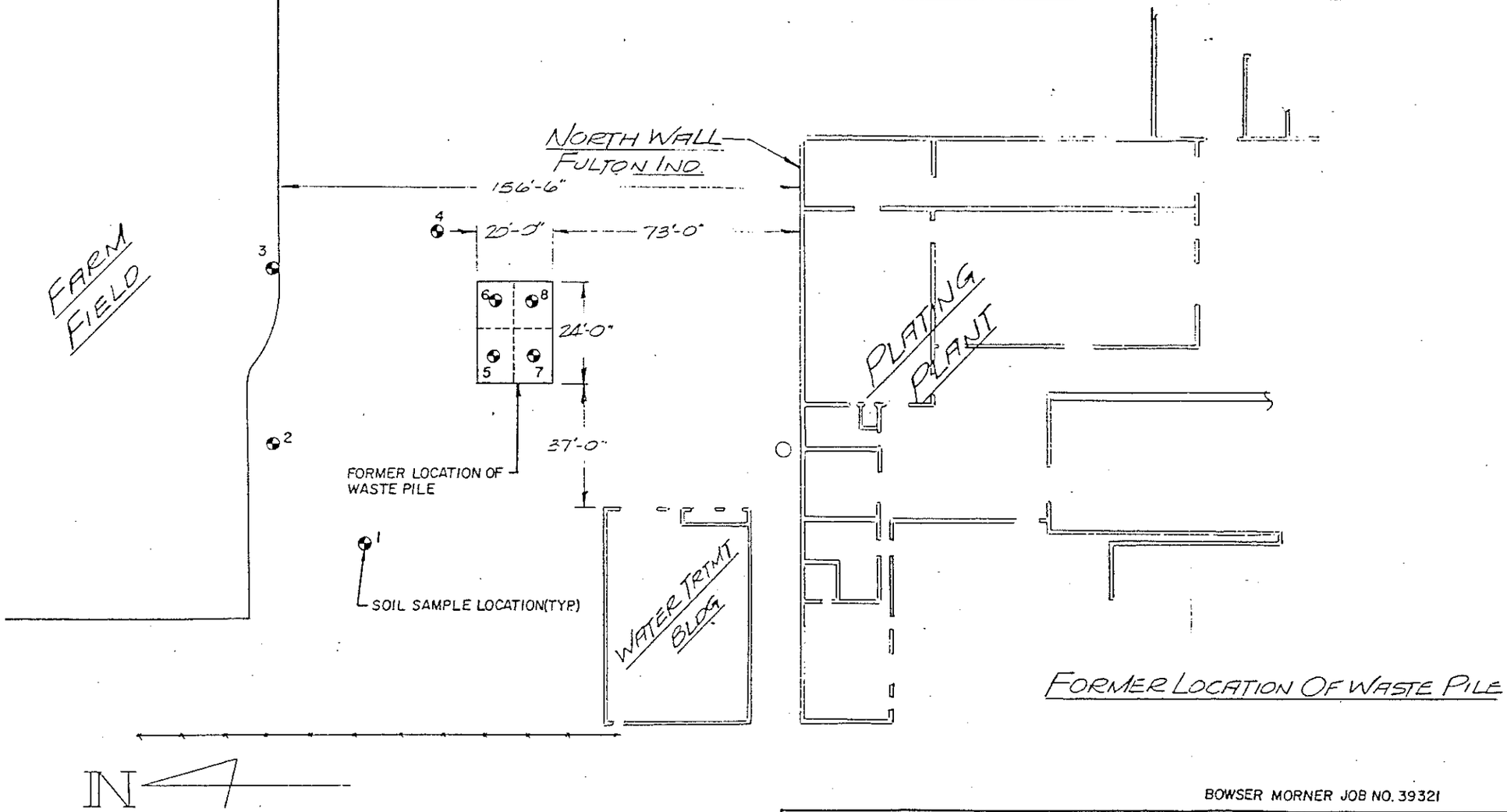
James M. Kemper
Chemist
Analytical Sciences Division

JMK/mj
1-Client
2-File

All samples recovered from this project will be retained at this laboratory for a period of 30 days unless we are informed to the contrary.

BOWSER MORNER

LET.	REVISIONS	DATE	LET.	REVISIONS	DATE
A	SOIL SAMPLE LOCATIONS (BY BOWSER MORNER)	1-3-86			



BOWSER MORNER JOB NO. 39321

OPERATIONS	UNLESS OTHERWISE SPECIFIED	FULTON INDUSTRIES INC.
	DEC. ± FRACT. ±	WAUSEON, OHIO
	MAT'L:	DR: HRS SCALE: 1"=30'-0"
	HARDNESS	CK: PHILIPS DATE: 10-11-85
	R. LG: WIDTH:	CUST. NO.:
	STRT'G GAGE:	NAME:
	STOCK NO:	PART NO.:

BOWSER-MORNER, INC.

CORPORATE: 420 Davis Ave. • P.O. Box 51 • Dayton, OH 45401 • 513/253-8805
TOLEDO DISTRICT: 122 S. St. Clair St. • P.O. Box 838 • Toledo, OH 43696 • 419/255-8200

LABORATORY REPORT

Report to: Fulton Industries
% BOWSER-MORNER, INC.
P. O. Box 838
Toledo, Ohio 43696
Attn: Mr. Glen Fitkin

Date: April 15, 1986
Laboratory No.: S 032618
Authorization:

Report on: Four (4) soil samples received March 26, 1986 for chemical analysis.

SAMPLE IDENTIFICATION:

The samples were identified as;

1, 2, 3, and 4.

ANALYTICAL METHODS:

For total cyanide the samples were prepared according to the EPA Field and Laboratory Methods Applicable to Overburdens and Minesoils; analysis was according to Standard Methods for the Examination of Water and Wastewater, 16th Edition.

The metals analyese were performed according to EPA SW-846 Method 3050.

QUALITY CONTROL:

Each analysis included a certified quality control sample. The true value of the parameter in the QC sample and the percent recovery in our analysis are included in this report.

TEST RESULTS:

	1	2	3	4	QC True Value	QC % Recovery
Cyanide, ppm	0.3	0.2	77	2	0.561	100
Cadmium, ppm	<5	<5	3100	<5	0.078	96
Chromium, ppm	55	31	45,000	28	0.52	100
Nickel, ppm	2	5	28	34	0.41	102

Respectfully Submitted,

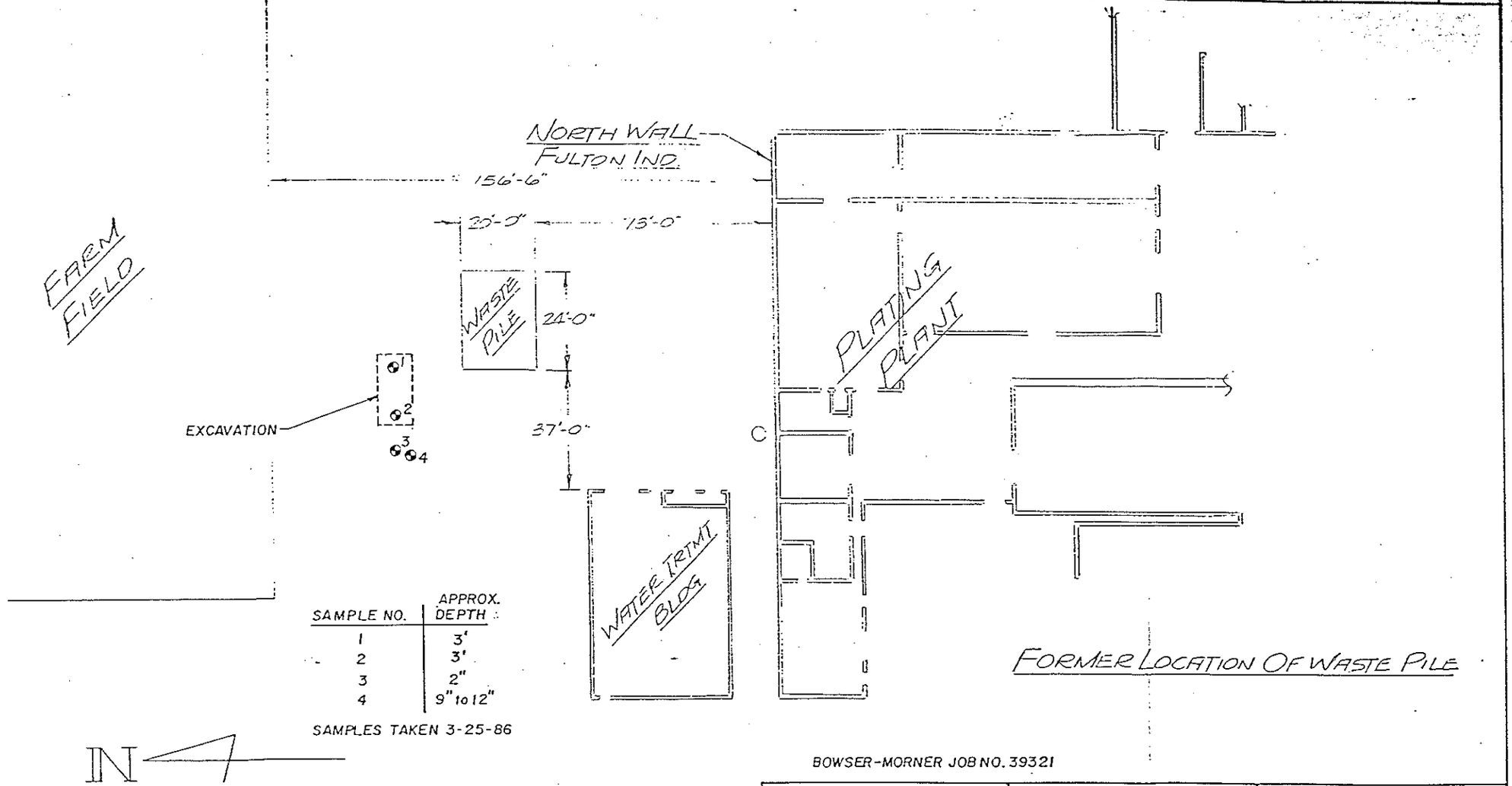
BOWSER-MORNER, INC.

Phyllis S. Szotak

Phyllis S. Szotak, Chemist
Analytical Sciences Division

All samples recovered for this project will be retained at this laboratory for a period of 30 days unless we are informed to the contrary.

LET.	REVISIONS	DATE	LET.	REVISIONS	DATE
A	SAMPLE LOCATIONS ADDED BY BOWSER-MORNER	4-23-86			



SAMPLE NO.	APPROX. DEPTH
1	3'
2	3'
3	2"
4	9" to 12"

SAMPLES TAKEN 3-25-86

BOWSER-MORNER JOB NO. 39321

OPERATIONS	UNLESS OTHERWISE SPECIFIED	FULTON INDUSTRIES INC.
	DEC. ± FRACT. ±	WAUSEON, OHIO
	MAT'L:	DR: HRS SCALE: 1"=30'-0"
	HARDNESS	CK: PHILIPS DATE: 10-11-85
	R. LG: WIDTH:	CUST. NO.:
	STRT'G GAGE:	NAME:
	STOCK NO:	PART NO.:

B. Quality Assurance Analyses

Parameter	Percent Recovery
Cyanide	102
Cadmium	90
Chromium	106
Nickel	98

Respectfully Submitted,

BOWSER-MORNER, INC.

James M. Kemper

James M. Kemper
Chemist
Analytical Sciences Division

JMK/lu
1-Client
2-File

All samples recovered for this project will be retained at this laboratory for a period of 30 days unless we are informed to the contrary.

BOWSER MORNER

BOWSER-MORNER, INC.

CORPORATE: 420 Davis Ave. • P.O. Box 51 • Dayton, OH 45401 • 513/253-8805
TOLEDO DISTRICT: 122 S. St. Clair St. • P.O. Box 838 • Toledo, OH 43696 • 419/255-8200

LABORATORY REPORT

Report to: Fulton Industries
% BOWSER-MORNER, INC.
P. O. Box 838
Toledo, OH 43696
Attn: Mr. Glen Fitkin

Date: May 22, 1986
Laboratory No.: S050768
Authorization:

Report on: Ten (10) Soil Samples for Cyanide and Metals Analyses, Received May 7, 1986.

SAMPLE IDENTIFICATION:

The samples were identified as 1 through 10.

ANALYTICAL METHODS:

The cyanide analysis was performed in accordance with Standard Methods for the Examination of Water and Wastewater, 16th Edition. The metals analyses were performed according to "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods," SW-846, U.S. EPA Office of Solid Waste.

QUALITY ASSURANCE:

Our analyses included certified quality control samples. The percent recoveries obtained in our analyses of these samples are reported in a section after the soil sample results.

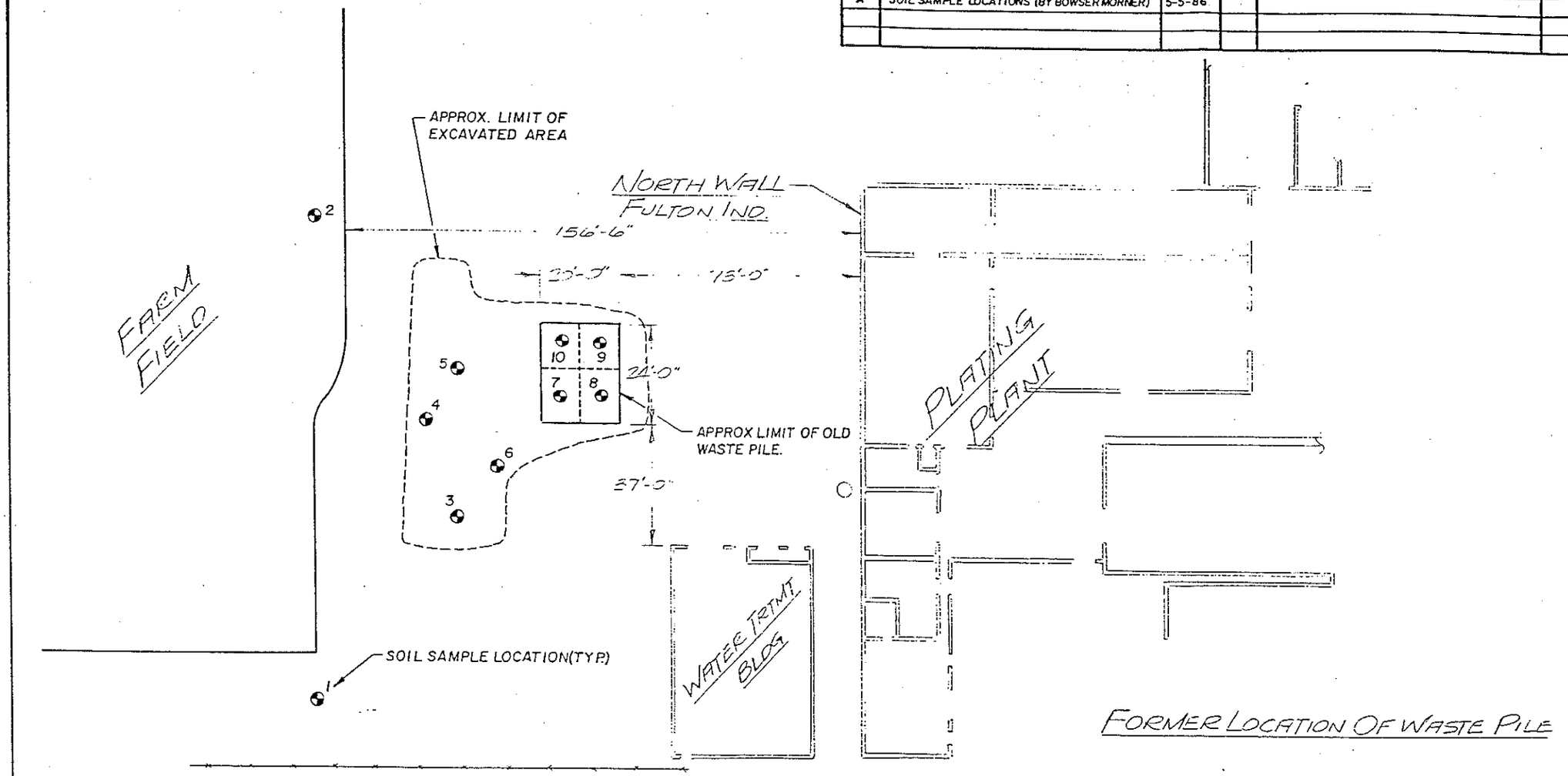
TEST RESULTS:

A. Soil Samples Analyses:

Sample	Cyanide, mg/kg	Cadmium, mg/kg	Chromium, mg/kg	Nickel, mg/kg
1	<0.5	<1	24	110
2	<0.5	<1	20	110
3	<0.5	<1	20	150
4	<0.5	<1	25	130
5	<0.5	1	27	34
6	<0.5	3	62	42
7	<0.5	<1	30	44
8	<0.5	<1	28	34
9	<0.5	<1	25	28
10	<0.5	1	30	54

- Continued -

LET.	REVISIONS	DATE	LET.	REVISIONS	DATE
A	SOIL SAMPLE LOCATIONS (BY BOWSER MORNER)	5-5-86			



BOWSER MORNER JOB NO. 39321

OPERATIONS	UNLESS OTHERWISE SPECIFIED	FULTON INDUSTRIES INC.
	DEC. ± FRACT. ±	WAUSEON, OHIO
	MAT'L:	DR: HRS SCALE: 1" = 30'-0"
	HARDNESS	CK: PHILIPS DATE: 10-11-85
	R. LG: WIDTH:	CUST. NO.:
	STRT'G GAGE:	NAME:
	STOCK NO:	PART NO.:

C.2 Compliance/ Enforcement

LAND DISPOSAL NOTIFICATION/CERTIFICATION FORM

ENVIRITE CORPORATION

CUSTOMER INFORMATION:

Generator Name: Fulton Industries Inc.

Pickup Address: 135 East Linfoot St. Wauseon, Oh. 43567

Generator EPA ID #: OHD094810736 Manifest Document # per Item 1/Item A: 23531 / _____

Envirite Waste Stream #'s: 11a. CS0181 11b. _____ 11c. _____ 11d. _____

MANIFEST ITEM NUMBER	DESCRIPTION OF WASTE*			TREATABILITY INFORMATION PER 40 CFR†				
	EPA WASTE CODE	SUBCATEGORY	TREATABILITY GROUP	268.41(a)	268.43(a)	268.42(a)(1) TABLE 1 & TABLE 2	NICKEL** ≥134 mg/l	THALLIUM** ≥130 mg/l
11A	F006		Non-Wastewater	X	X			

* *Subcategory references to "Acid," "Alkaline," "Reactive Cyanides," and "Reactive Sulfides" are understood to be respectively, Acid Subcategory—261.22(a)(1), Alkaline Subcategory—261.22(a)(1), Reactive Cyanides—261.23(a)(5), and Reactive Sulfides—261.23(a)(5). Waste analysis data, where available, accompanies this shipment.*

† *unless otherwise specified. Also, a "✓" or an "X" relates the CFR sections and paragraphs where the treatment standards appear. When required, the five-letter treatment code is specified.*

** *in liquid hazardous wastes including free liquids associated with any solid or sludge containing this metal (or element). See RCRA section 3004(d).*

≥ *denotes "greater than or equal to."*

SECTION 1: Restricted Wastes Requiring Treatment prior to Land Disposal

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated does not meet applicable treatment standards set forth in 40 CFR 268 Subpart D or exceeds the applicable prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d); and 2) to apprise the facility of the CFR section(s) and paragraph(s) where the treatment standards appear and, where applicable, the prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d).

Printed Name: Tom Gleckler Signature/Date: Tom Gleckler / 10/25/90

SECTION 2: Restricted Wastes from Generators That Can Be Land Disposed without Further Treatment

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated can be land disposed without further treatment; and 2) to certify that the waste meets the standards referenced above and does not exceed the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Printed Name: _____ Signature/Date: _____ / _____

SECTION 3: Restricted Wastes from Treatment Facilities That Can Be Land Disposed without Further Treatment

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated can be land disposed without further treatment; and 2) to certify that the waste meets the standards referenced above and does not exceed the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268, subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Printed Name: _____ Signature/Date: _____ / _____

REV.1-7/90

RETURN ORIGINAL TO RECEIVING FACILITY—RETAIN COPY FOR YOUR FILES

NOV 15 1990

5HR-12

Tom Gleckler, Finishing Manager
Fulton Industries
135 East Linfoot Street
Wauseon, Ohio 43567-03377

Re: Fulton Industries
OHD 094 810 736

Dear Mr. Gleckler:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on October 25, 1990. The stated action appear to adequately address the land disposal restriction deficiency outlined in our September 28, 1989, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS
William Radlinski, IEPA

5HR-B.RUSSELL:ev:11/14/90:3-7928:FILENAME: Gleckle

Author's File Copy

NOV 1 5 1990

5HR-12

Tom Gleckler, Finishing Manager
Fulton Industries
135 East Linfoot Street
Wauseon, Ohio 43567-03377

Re: Fulton Industries
OHD 094 810 736

Dear Mr. Gleckler:

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Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS
William Radlinski, IEPA

5HR-B.RUSSELL:ev:11/14/90:3-7928:FILENAME: Gleckle

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
EV 11/14/90	BR 11/14/90				REB, acting 11-14-90				

OFFICIAL File Copy- Concurrences

RECEIVED
OCT 03 1989
IEPA-DLPC

5HR-12

28 SEP 1989

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Tom Gleckler, Finishing Manager
Fulton Industries
135 East Linfoot Street
Wauseon, Ohio 43567-0377

Re: Second Notice of Violation
Fulton Industries
OHD 094 810 736

Dear Mr. Gleckler:

On April 14, 1989, a Notice of Violation (NOV) was sent to you citing a land disposal restriction violation discovered at the above-referenced facility during a Resource Conservation and Recovery Act (RCRA) inspection on November 16, 1988. The NOV indicated that you should submit to the United States Environmental Protection Agency (U.S. EPA) documentation demonstrating that the cited violation has been corrected. The violation is listed below:

> Failure to provide a separate written notice attached to the manifest for each shipment of restricted wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest number, and waste analysis data, where available, as required by Section 268.7(a)(1).

To date, U.S. EPA have not received any documentation indicating that the above cited violation has been adequately addressed. You are hereby requested to submit to the U.S. EPA within 10 days of the receipt of this letter, documentation addressing the violation cited in the April 14, 1989, NOV. Failure to correct the violation may subject the facility to further Federal enforcement action.

RECEIVED
OCT 10 1989
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA, CMS
✓Glenn Savage, IEPA, FOS

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA, CMS
Glenn Savage, IEPA, FOS
5HR-12:B.RUSSELL:ev:9/20/89:DISK #2:FILE NAME: Gleckler

EV 9-27-89

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	BR 9/27/89	FRM 9/27/89	

B. Russell (5HR-12)

P 611 586 962

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to TOM Gleckler	
Street and No. 135 East Linfoot St.	
P.O., State and ZIP Code Wauseon, Ohio 43567-0377	
Postage	$ 45
Certified Fee	85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	90
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 2.20
Postmark or Date	CHICAGO, ILL. SEP 28 1989 USPO STA

★ U.S.G.P.O. 1983-403-517

PS Form 3800, Feb. 1982

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. *(Extra charge)*
2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to:
TOM Gleckler, Finishing Manager
Fulton Industries
135 East Linfoot Street
Wauseon, Ohio 43567-0377

4. Article Number P 611 586 962

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X Robin Russ

7. Date of Delivery
10-2-89

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

14 APR 1989

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tom Gleckler, Finishing Manager
Fulton Industries
135 East Linfoot Street
Wauseon, Ohio 43567-0377

Re: Notice of Violation
Fulton Industries
OHD 094 810 736

Dear Mr. Gleckler:

On November 16, 1988, the Ohio Environmental Protection Agency (OEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The Land Disposal Restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 268, and 270-271). Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

> Failure to provide a separate written notice attached to the manifest for each shipment of F-solvent wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifests number, and waste analysis data, where available, as required by Section 268.7(a)(1);

A copy of the inspection report is enclosed for your records. please submit to this office, within thirty (30) days of receipt of this Notice of Violation, and documentation demonstrating that the above cited violation has been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Janet M. Leite, OEPA, Northwest District Office

bcc: Sally Swanson

5HR-12:B. RUSSELL:or:04/05/89:3-7925:DISK# 3:PC FILENAME:galecker

O.R. 4/7/89

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	BR 4/11/89	RCB acting 4-11-89	

P 155 069 718

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Tom Gleckler	
Street and No. 135 East Linfoot Street	
P.O., State and ZIP Code Wauseon, Ohio 43567-0377	
Postage	$ 1.25
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 3.00
Postmark or Date	

PS Form 3800, June 1985

5HR-12) B.RUSSELL-230 S. Dearborn, Chicago, IL 60604

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. *(Extra charge)*
2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to:

Tom Gleckler, Finishing Manager
Fulton Industries
135 East Linfoot Street
Wauseon, Ohio 43567-0377

4. Article Number
P 155 069 718

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X Robin Rush

7. Date of Delivery
4-17-89

8. Addressee's Address *(ONLY if requested and fee paid)*

WAUSEON OHIO APR 17 1989 USPS

PS Form 3811, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 DOMESTIC RETURN RECEIPT

Ms. Barbara Russell SHR-12
P 155 069 612

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Mr. Ralph Casten	
Street and No. 975 Rohlwing Road	
P.O., State and ZIP Code Rolling Meadows, IL 60008	
Postage	$ .45
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$2.20
Postmark or Date	CHICAGO, ILL. 60604 MAR 23 1989 USPO

PS Form 3800, June 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
1. ☒ Show to whom delivered, date, and addressee's address. ↑*(Extra charge)*↑
2. ☐ Restricted Delivery ↑*(Extra charge)*↑

3. Article Addressed to:
Mr. Ralph Casten
Casten Auto Body
975 Rohlwing Road
Rolling Meadows, IL 60008

4. Article Number
P 155 069 612

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X

7. Date of Delivery
3-24-89

8. Addressee's Address *(ONLY if requested and fee paid)*
975 ROHLWING
ROLLING MEADOWS
Ill. 60008

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

CMEL FS, ISD, LD

OhioEPA
State of Ohio Environmental Protection Agency

Northwest District Office
035 Devlac Grove Dr.
Bowling Green, Ohio 43402
(419) 352-8461

RECEIVED
OHIO EPA
DEC 19 1988
DIV. of SOLID & HAZ. WASTE MGT

Richard F. Celeste
Governor

Re: Fulton County
Fulton Industries
OHD094810736
Hazardous Waste

December 8, 1988

Mr. Tom Gleckler
Finishing Manager
Fulton Industries
135 E. Linfoot Street
Wauseon, OH 43567-0377

Dear Mr. Gleckler:

A generator inspection was conducted at Fulton Industries in your presence on November 16, 1988. The purpose of this inspection is to assess compliance with state and federal regulations applicable to a generator of hazardous waste. The following violations of state and federal law were noted at the time of the inspection:

1. 40 CFR 262.21 a and b 262.22 and OAC 3745-52-21 and 3745-52-22.
2. 40 CFR 262.42 a and b and OAC 3745-52-42.
3. 40 CFR 262.40 a and OAC 3745-52-40a.

These three violations concern manifests. Please send me copies of manifest numbers 00060, 00063, and 00064 with the final TSD signature.

4. 40 CFR 265.16 d and e and 262.34 and OAC 3745-65-16 d and e and 3745-52-34 A4. Hazardous waste training for all employees handling hazardous waste must be provided within six months of start date and renewed annually. Training must be documented.

5. 40 CFR 265.51 and OAC 3745-65-52 a,b,c,d,e. Your facility's contingency plan must be revised to include:

   a) a list of all emergency equipment including location, physical description and outline of capabilities
   b) an evacuation plan for facility personnel
   c) statements of agreements/arrangements with local or state emergency authorities

When these revisions are completed, please send me a copy of the plan.

6. 40 CFR 265.174 and OAC 3745-66-74. You must begin doing weekly inspections of your container storage area and these inspections must be documented. The inspection should include checks for evidence of leaks, corrosion, etc.

Please be advised that failure to comply with applicable hazardous waste rules may be cause for enforcement action by this Agency pursuant to Chapter 3734 of the Ohio Revised Code.

Please respond, in writing, to this Notice of Violation (NOV) within ten (10) days. Your response must include all actions and timetables necessary to achieve compliance. In any event, total compliance must be achieved by April 1, 1989.

Failure to list specific deficiencies in this communication does not relieve your from the responsibility of complying with all applicable regulations.

A copy of the completed inspection form is enclosed for your review. If you have any questions, please advise.

Sincerely,

Janet M. Leite

Janet M. Leite
Div. of Solid & Hazardous Waste Mgmt.

/eb

Enclosure

cc: Dave Sholtis, DSHWM, CO
Janet Leite, DSHWM, NWDO
NWDO File
A & C Rep.

Certified
P-456-027-823

JUN 0 2 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5HW-13

Mr. R.N. Cheney
Fulton Industries Inc.
135 East Linfoot
Wauseon, Ohio 43567

Re: Fulton Industries Inc.
EPA I.D. No. OHD 094810736
135 East Linfoot
Wauseon, Ohio 43567

Dear Mr. Cheney:

The above referenced facility is a hazardous waste treatment, storage, or disposal facility subject to the Resource Conservation and Recovery Act (RCRA) as amended. Federal regulations (40 CFR Part 265 Subpart H) require that such a facility shall provide to the United States Environmental Protection Agency (U.S. EPA) proof of financial assurance for closure by July 6, 1982, and liability coverage by July 15, 1982, (40 CFR 265.143 and 265.147 respectively).

To date U.S. EPA has not received these proofs; consequently, the facility is in violation of requirements of 40 CFR Part 265 Subpart H. The Agency considers these financial responsibility proofs as significant requirements of the hazardous waste regulations. Failure to provide these required proofs within 30 days of receipt of this notice may subject the facility to enforcement action. RCRA provides for civil penalties up to $25,000 per violation. Please forward the financial responsibility proofs to:

RCRA Activities
Attn: Financial Requirements
P.O. Box A3587
Chicago, Illinois 60690

If you have any questions or desire additional information, please contact Mr. Charles B. Slaustas of my staff, at (312) 353-2474.

Sincerely,

William Miner, Chief
Technical, Permits, and Compliance Section

cc: Deborah E. Tegtmeyer, OEPA

bcc: Thomas B. Golz, TPCS

CBS 6/2/83 WHW 6/2/83