

115CC RL Miller 73975



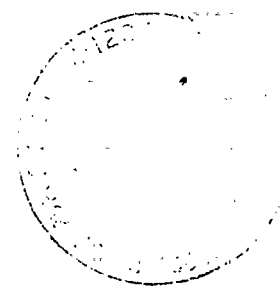
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1012 Water Street
Meadville, Pennsylvania 16335
Telephone: A. C. 814/724-8526
January 4, 1985



CERTIFIED MAIL #P446 369 086

Subject: Hazardous Waste Generator
Follow-Up Inspection
Lord Corporation, Chemical Products Group
Borough of Saegertown, Crawford County
I.D. No. PAD048203822



Mr. Norman M'Sadoques
Chemical Buyer
Lord Corporation, Chemical Products Group
P. O. Box 556
Saegertown, Pennsylvania 16433

Dear Mr. M'Sadoques:

Enclosed you will find the follow-up inspection report from my December 28, 1984 inspection of your facility.

Should you have any questions or comments concerning this report, please feel free to contact me at this office.

Sincerely,

Benjamin J. Lammie

Benjamin J. Lammie
Solid Waste Specialist
Borough of Solid Waste Management

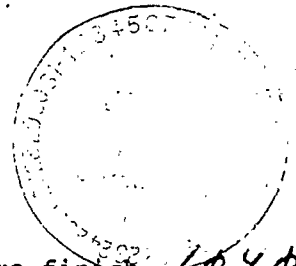
BJL/csm

Enclosure

AR200514

Followup Inspection

HAZARDOUS WASTE INSPECTION REPORT Generators - Part A



Date of inspection 12/28/84 Time start 1015 Time finish 1040

Name of inspector Be J. Lammie

Company, installation name Lead Carpenter (CPG)

Location P.O. Box 556

County Crawford Municipality Legetown

Identification number WAD 048203822

Name of responsible official Mr. Haman M. Sadouess

Title Chemical Buyer

Mailing address P.O. Box 556 Legetown, PA 16433

Area code and phone no. 814-763-2345

Name of person interviewed Mr. Ron Miller

Title Plant Manager

Mailing address (if different from above) Same

Area code and phone no. Same

1. Current waste handling method:

- a. On-site treatment, storage, disposal
- b. On-site use, reuse, recycle, reclaim
- c. Off-site treatment, storage, disposal
- d. Off-site use, reuse, recycle, reclaim

2. Amount of hazardous waste produced:

- a. ~ 10,000 gallon kg./mo. organic solvents
- b. ~ 210,000 lbs kg./yr. other

3. Types of hazardous waste produced by Hazardous Waste Number:

D001, D002, F001, F002, F003

AR200515

4. Are hazardous wastes transported off-site by the generator? Yes No

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part B

PA11 018263822 12/28/84

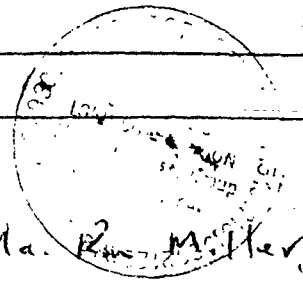
1- NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS	REQUIREMENT	CHAPTER CITATION
1		75.262
✓	Identification number	(c) (1)
✓	Hazardous waste shipments offered only to licensed transporters	(c) (4)
✓	Authorization received from TSD facility for wastes shipped off-site	(d)
✓	PA manifest used for intrastate shipments	(e) (1) (i)
✓	Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1) (ii)
✓	Manifests filled out properly and completely	(e) (1)
✓	Manifests routed properly and within time limits (24 hours)	(e) (2)
✓	Proper U.S. DOT shipping containers or packages	(f) (1) (i)
✓	Shipping containers marked and labeled according to U.S. DOT	(f) (1) (ii)
✓	Containers of 110 gal. or less marked with required PA label	(f) (1) (iii)
✓	Placards offered to transporter	(f) (2)
✓	Wastes accumulated on-site for less than 90 days	(g) (1)
✓	Wastes stored in proper containers and properly marked and labeled	(g) (1) (i)
✓	Containers managed in accordance with 75.265(g)	(g) (1) (ii)
✓	Containers clearly marked with accumulation date and visible for inspection	(g) (1) (iii)
✓	Records retained at designated location for 20 years	(h)
✓	Quarterly reports submitted to the Department	(i)
✓	Exception reporting procedures followed	(j)
✓	Hazardous waste disposal plan, if required	(l)
✓	Spill reporting procedures followed	(m) (1)
✓	Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
✓	Special requirements followed for international shipments	(o)

AR200516

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of inspection 12/28/84 Identification number 2A0 698263822
Company, Installation name Lord Corporation (CE)
Crawford Municipality Sageston



Comments

1. The following information was discussed with Mr. Miller, Plant Manager.
2. This followup inspection was conducted based on the violations noted in the Department's October 2, 1984 inspection and November 8, 1984 NOU to the facility.
3. At the time of the followup the areas of non-compliance (labeling requirements) had been remedied.
4. Made Mr. Miller aware of the Department's findings regarding the baghouse dust/solvent mixture and the PPC plan evaluation for the periodic drum pressure release process.
5. Told Mr. Miller Department plans penalty assessment for labeling violation of October 2, 1984 inspection.
6. On Jan 8, 1985, 9:00 AM the Department will attend sampling of Cell Tank for determination of His waste solution.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person interviewed (signature) _____ Date _____
Inspector (signature) Ben J. Hamrick SW 06 Date AR200517 1/2/85

Sent Certified

Guy G. McUmber, Solid Waste Specialist
Bureau of Solid Waste Management
Commonwealth of Pennsylvania
Department of Environmental Resources
1012 Water Street
Meadville, PA 16335

December 5, 1984

Subject: Hazardous Waste Generator Inspection
LORD Corporation, Chemical Products Group
Borough of Saegertown, Crawford County
I.D. No. PADO48203822
Notice of Violation - Your letter of 11/8/84 (Received 11/14/84)

Dear Mr. McUmber:

We have reviewed the violations listed in the above referenced letter and have collectively formulated response which we herewith submit:

1. Waste Container Labeling - 75.262 (g)(i.i.).

We acknowledge that while all of the information listed in 75.262 was not on the containers, it is important to note that the containers were labeled as hazardous waste by the use of our TSD's code numbers (WPS) and that the accumulation date was clearly marked on each. Additionally, the DOT waste description and UN number appeared on each drum.

The DOT label noting generators name, manifest number and the statement "Hazardous Waste - Pennsylvania and Federal laws prohibit improper disposal. If found ..." was being added at time of shipment. This procedure was employed in order to (1) facilitate notation of manifest number (typed) and (2) ensure that the label was completely legible as we have found in the past that outside storage of the containers and their labels tend to severely degrade the label's legibility. In essence, LORD/CPG was in compliance with the spirit of the law, if not the letter.

It is important however for LORD to accept the guidance of the regulatory agency in this area. In that vein, we instituted the addition of the DOT label in question to be applied to each waste drum in storage. This procedure was adopted immediately following your inspections and comments on October 3, 1984.

AR200518

2. Proper Hazardous Waste Determination on Baghouse Dust - 75.262 (b)(1)(iii).

A waste determination on this material was performed using the DER/EPA permitted procedure of "applying knowledge of the hazard characteristic of the waste in light of the materials or processes used". The constituents contained in the baghouse dust were identified and communicated to the TSDF via the waste product survey form. The information given on that form clearly states the expected level of a given constituent in a particular waste category. A waste category is process related. An example of a process and the logic used in communicating waste make up is as follows:

The raw materials used to make the finished product are combined into the appropriate processing equipment. These raw materials basically consist of solvents, pigments and resins. These materials are then processed in and packaged from this same equipment.

Once packaging is completed, the processing equipment is rinsed with solvent (compatible with the product made) to wash it clean of any remaining product. This used wash solvent is then packaged into drums as waste. Note: It now consists of the product (solvent, pigment and resins) diluted in wash solvent.

During processing, the pigments are added into the processing equipment under local exhaust to contain any airborne pigment dust that results. This pigment dust is collected in drums at the baghouse. However, during 90 days of collection, these baghouse dust drums rarely end up more than half full (by volume in the fluffed state). The composition of the collected dust in each baghouse dust drum would roughly be proportional to the total amount of pigments used in the products made over the collection (90 day) period.

As the wash solvent waste generated in clean-up of the processing equipment already contains these same pigments collected at the baghouse in roughly the same proportions, these drums which are only partially filled with the baghouse dust are then topped off with the used wash solvent waste from the clean-up of the processing equipment. This keeps all similar wastes generated from a process in the same single waste stream and also leaves it in a single physical form (liquid-suspension) that can be properly processed by the disposal facility.

AR200519

PADER
December 5, 1984
Page Three

3. Baghouse Dust Not Indicated on Manifest.

Wastes sent off-site generated by the example above have been categorized and placed into an EPA/DER category consistent with the hazardous nature of the major constituents. Baghouse dust which falls into an F003 category, for instance, is not mixed with wastes falling to a D001 category.

Also, on May 14, 1982, an inspection of our facility was performed by Mr. James D. Rozakis out of your Meadville office. During his inspection, Mr. Rozakis also questioned the classification of our waste streams. At that time, the classification of D001 was employed for all flammable wastes as we felt that the ignitability of these wastes was of the prime concern. Following Mr. Rozakis' inspection, wishing to be in full compliance with the regulations, we forwarded for DER's review a copy of each waste product survey form requesting DER's assistance at proper waste number characterization. A copy of my letter dated June 7, 1982 and DER's reply of July 12, 1982 is attached.

4. Waste Polyurethane Containers Open During Storage.

As I had explained during the inspection, the containers in question were vented to allow gases generated by the reaction to escape without causing drum failure. Concern for the safety of our employees had prompted such a procedure. Attached is a caution issued by one of this area's major drum manufacturers advising us of the hazards of even small amounts of unvented air pressure. To answer the questions posed in your letter on generation, chemical constituents and chemical reactions, we offer the following:

The drums contain rinse waste from urethane reaction vessels and other vessels which held urethane reaction product. As a result, the waste contains material with isocyanate functionality. The isocyanate functionality is very reactive with water from any source. When the isocyanate reacts with water, an amine and carbon dioxide is formed as indicated below:



The water participating in the reaction comes primarily from the rinse solvent, but even moisture in the air is sufficient to cause this sort of reaction. Water is not purposely added to cause the reaction. The amount of gassing cannot be predicted because the amount of isocyanate and water in the wash waste both vary.

1R200520

PADER
December 5, 1984
Page Four

Finally, we are exploring the use of pressure release bungs to be attached on drums found to be in a "reactive state". Initial attempts at use of currently available pressure release bungs have failed as the valves either clogged or would not release pressure fast enough to ensure low pressure build-up in the drums. Our attempts are continuing with the objective of employee safety and regulatory compliance (i.e. covering of drums).

I believe this letter satisfactorily responds to your November 8 communication. I again state that it is LORD/Chemical Products Group's intent to remain in compliance with all DOT, EPA AND DER regulations. Should any points contained herein need further clarification, please feel free to call.

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

NGM/j

bcc: J.A. Boughton, R.L. Miller, G.F. Metzinger

w/attachments

AR200521

INTER-OFFICE
CORRESPONDENCE**LORD**

DATE: November 15, 1984
 TO: Addressees
 FROM: N.G. M'Sadoques
 SUBJECT: PADER Inspection of October 2-3, 1984
 Notice of Violation dated November 8, 1984

*I understand
 R.L. Miller will
 be in 11/20
 Suggest we wait till
 then for this meeting
 Time will be consumed
 NGM
 11/16*

Attached to this memo is DER's official Notice of Violation which reiterates discrepancies found in their October 2-3, 1984 inspection.

Point #1, labeling of hazardous waste containers, has been taken care of and is well documented by memos submitted from my office.

Points #2 & #3 address the bag house dust and, essentially, state that we have not performed the proper waste determination on that material.

Point #4 deals with our procedure of venting gases on drums which contain material in the reaction state going from the liquid to the solid phase.

It is imperative that we quickly and promptly formulate a response to this notice of violation. I do believe this response could only be handled properly by the input of all individuals concerned in our organization. Thus, a meeting is in order, and I will take this time to suggest a meeting take place at 2:00 PM on November 16 in the main conference room. I leave it up to the addressees to determine which individuals should attend this meeting. Whose input do we need?

NGM
 N.G. M'Sadoques

NGM/j

Addressees:

Wm. Aylsworth
 J.A. Boughton
 R.L. Miller
 G.L. Johnson
 R.E. Polak
 D.A. Parmeter
 W.A. Barker
 R.E. Stark

AR200522



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1012 Water Street
Meadville, Pennsylvania 16335
Telephone: A. C. 814/724-8526
November 8, 1984



CERTIFIED MAIL #P446 369 635

NOTICE OF VIOLATION

Subject: Hazardous Waste Generator Inspection
Lord Corporation, Chemical Products Group
Borough of Saegertown, Crawford County
I.D. No. PAD048203822

Mr. Norman M'Sadoques
Chemical Buyer
Lord Corporation, Chemical Products Group
P. O. Box 556
Saegertown, Pennsylvania 16433

Dear Mr. M'Sadoques:

A Hazardous Waste Generator Inspection was conducted at your facility on October 2, 1984, pursuant to the Pennsylvania Solid Waste Management Act, July 7, 1980, P.L. 580, No. 97, 35 P.S. 6018.101 et seq.; and the Chapter 75 Rules and Regulations of the Pennsylvania Department of Environmental Resources. The comments regarding violations revealed and other matters related to the inspection are as follows:

1. Fifty-nine hazardous waste containers were found as lacking required Pennsylvania labels. This situation violates Subsection 75.262(g)(ii) of the Department's Rules and Regulations, which states:

"A generator may accumulate hazardous waste on-site without a permit for ninety (90) days or less, provided that:

The waste is placed in containers which meet all U.S. Department of Transportation packaging, marking, and labeling the requirements in Section F,...

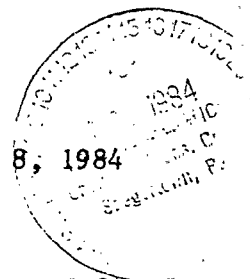
Relatedly, Subsection 75.262(f)(1)(iii) of the Department's Rules and Regulations states that generators should "...permanently mark each container of 100 gallons or less according to U.S. Department of Transportation requirements under 49 C.F.R. Section 172.304..."

2. A proper hazardous waste determination has never been performed on the waste baghouse dust generated by Lord Corporation. The determination done by the company found the baghouse dust to be hazardous, but the waste's hazardous characteristic(s) was not determined. This situation violates Subsection 75.262(b)(1)(iii) of the Department's Rules and Regulations, which states:

CC Bill Aylerworth
RLM
JAB
GLJ
RFP
D Saperstein
W A Barber
Ann Stank

AR200523

November 8, 1984



"A person or municipality who generates a solid waste as defined in Article 1 of this Act (35 P.S. Sections 6018.101-6018.108) shall determine if that waste is a hazardous waste using the following procedure:

If the waste is not listed, he shall determine whether the waste is identified in Section 75.261(g) (relating to criteria, identification and listing of hazardous wastes) by either:

Testing the waste according to the methods set forth in Section 75.261 (relating to criteria, identification and listing of hazardous wastes) or according to an equivalent method approved by the Department; or

Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used."

3. The aforementioned baghouse dust was also never indicated on manifests, although, according to the company, the waste was always sent off-site in hazardous waste containers (mixed with D001, F001, F002 and F003 wastes). This situation violates Subsection 75.262(e)(1)(v)(c) of the Department's Rules and Regulations, which states, in part:

"The Department manifest shall require the following information as a minimum:

The proper U.S. Department of Transportation shipping name, U.S. Department of Transportation hazard class, and U.N. number of the waste..."

4. It was also observed during the inspection that four waste polyurethane containers were open during storage. Those interviewed stated that this situation was necessary in order to prevent rapid venting of gases from a closed container and, relatedly, damage or injury. As indicated by the Department during the inspection, this operation may be considered either 1) physical treatment of a hazardous waste or 2) improper container management. In conversations with you since the inspection, the Department has requested further information on this process (supplied) in order to determine its status. The Department now feels that further technical information describing this process should be provided and reviewed prior to a final Departmental decision being made. This information should address the following points:

- A. How the waste is generated, including data on the industrial materials contaminating the waste and how the waste is separated off.

- B. The chemical constituents of the waste.

- C. The chemical reactions which take place during the aforementioned process.

AR200524

Mr. Norman M'Sadoques

-3-

November 8, 1984

These items should be detailed as fully as possible, with this information submitted within thirty (30) days of receipt of this letter.

The Act provides for separate penalties for any violation of its sections, any rule or regulation of the Department or any permit condition. Up to \$25,000 per violation in civil penalties could be assessed under Section 605 of the Act, and Section 606 provides for criminal penalties.

In order to resolve the above stated violations, your company should:

1. Immediately label all containers as indicated, and hereafter ensure that all hazardous waste containers are labeled in accordance with Subsection 75.262(g) of the Department's Rules and Regulations.
2. Conduct a proper hazardous waste determination on the aforementioned baghouse dust as per Subsection 75.262(b) of the Department's Rules and Regulations, and notify the Department of this result within forty-five (45) days. Also, your company should not send this waste off-site until after this determination is made. Relatedly, your company should make the disposal facility involved aware of the past acceptance of this waste. Lord Corporation should also ensure that in the future, the waste is handled and disposed of in light of the information gathered from the hazardous waste determination.

Also, the Department wishes to reiterate that the data requested on the polyurethane waste stream should be submitted within thirty (30) days of receipt of this letter.

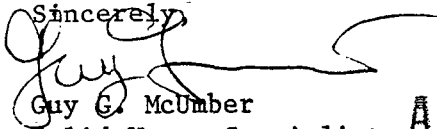
This Notice does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this Notice or the conditions upon which the Notice is based.

This Notice shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This Notice shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions or comments regarding these matters, please feel free to contact me.

Sincerely,


Guy G. Mcumber

Solid Waste Specialist

Bureau of Solid Waste Management

AR200525

GCM/csm

James D. Rozakis, Solid Waste Specialist
Department of Environmental Resources
Bureau of Solid Waste Management
1012 Water Street
Meadville, PA 16335

June 7, 1982

Subject: Determination of Proper Hazardous Waste Number
use on our manifests

Reference: Your visit on May 14, 1982

Dear Jim:

Enclosed you will find waste product survey forms on all our halogen-containing drum wastes. The following is the list, by Generator code, of the waste product surveys enclosed:

<u>Generator Code</u>	<u>Description</u>
LO	Liquid Organic
1A;1B	Urethane Room/Reactor
2A	Adhesive Kady Mill
2B	Adhesive Sand Mill
3A;3B	Acrylic/Epoxy-Ross/Cowles
4A	Solid Urethane
4B	Solid Adhesive
4C	Solid Filter
5	Filtrate

I wish for you to review these and after which, communicate in writing your position on the proper hazardous number which you feel should be associated with these streams. I must also request your letter refer to each waste by Generator code number.

One point should be taken into consideration when making the evaluation, that is - each of these have a flash point below 100° F. We still feel that this factor overrides the dangers of the small amount of halogens which appear essentially as contaminants.

AR200526

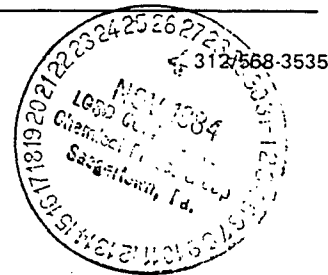
Sincerely,

N.G. M'Sadoques
Chemical Buyer

bcc:G.F. Metzinger, J.A. Boughton, S.M. Stvborski, H.G. Rovlan.

VAN LEER CONTAINERS, INC.

4300 WEST 130TH STREET
CHICAGO, ILLINOIS 60658



November 19, 1984

TO OUR CUSTOMERS:

As a manufacturer of steel shipping containers, we are deeply concerned that these containers be used properly. The purpose of this letter is again to bring to your attention two hazardous practices to which steel shipping containers are sometimes subjected. The first of these is the use of air pressure to empty containers and the second is the use of a cutting torch or tool to remove the head of a closed head drum or otherwise cut up a drum.

A steel shipping container is basically a shipping container for liquid, semi-solid and dry solid materials. It is not a pressure vessel and under no circumstances should it be subjected to internal air or gas pressure.

While it is true that drums are leak tested by air pressure of from 7 to 15 pounds at time of manufacture, testing is done under carefully controlled conditions whereby the ends are supported to prevent distortion and possible rupture. If not supported, head and bottom distortion is measurable at as little as 3 p.s.i. and stress creases appear at 6 to 7 p.s.i.

It is also true that drums manufactured to certain DOT specifications must pass pressure tests of from 15 to 40 pounds, but these are hydrostatic tests with water pressure, not air. If failure does occur in a hydrostatic test, it is not hazardous, but the same failure under air pressure would be extremely hazardous. Even in hydrostatic tests at 15 p.s.i. and up, the drums are seriously deformed with both heads bulged outward.

Therefore, should you ask how much air pressure could safely be applied to a steel drum, our answer is simply NONE. Failure of a drum under air pressure is explosive and can propel the drum or parts of it, causing severe injury or damage.

The use of a cutting torch or tool is also hazardous. Although a drum may appear to be empty, slight amounts of vapor or residue may be left inside. The flame from a torch or the sparks from a tool might ignite the residue or vapor creating a hazardous fire, or in the extreme case, an explosion. The force of the explosion can propel the drum or parts of it and can cause severe damage or injury.

We would like you to call these hazards to the attention of those in your organization. We would also encourage you to inform your customers that receive your product in steel shipping containers of the dangers involved in using air pressure, cutting torches or cutting tools on steel shipping containers so that good safety practices are known and observed.

Sincerely,

H. T. Perrin
Director of Technical Services

AR200527

gt



THE VAN LEER GROUP OF COMPANIES

FU 316

Benjamin J. Lammie, Solid Waste Specialist
Commonwealth of Pennsylvania
Department of Environmental Resources
1012 Water St.,
Meadville, PA 16335

February 18, 1985

Subject: PP&C Plan Amendment
Releasing Pressure Build-Up from Hazardous Waste Containers

Reference: My letter of January 15, 1985

Dear Mr. Lammie:

As promised in my above referenced letter, we are herewith submitting our PP&C amendment to cover the handling of pressure build-up within drums of hazardous waste.

I request your review of this procedure and, if found to be acceptable, written acknowledgement to that effect.

Ben, this final piece of work by LORD brings us up to par with PADER expectations and corrects all discrepancies noted in your facilities inspection of October 2 and 3, 1984.

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

NGM/j

bcc: J.A. Boughton, R.L. Miller

RLM approved before mailing

AR200528

Releasing Pressure from Drums

Purpose:

Internal pressure buildup within drums can constitute a potential physical and environmental hazard. This procedure details the steps which must be taken to ensure the safety of personnel and provide for the proper handling of potential spills resulting from the untimely rupture of pressurized drums.

Procedure:

The initial indication that a drum is building pressure is the bulging of the drum ends. The following steps should immediately be taken:

1. Have available at least 5 gallons of diking/absorbent compound to control any potential spill.
2. Slowly loosen bung to release pressure. If pressure buildup is excessive, a manually powered drill may be used to drill a 1/8" hole through the bung prior to being loosened.
3. Place a large, plastic spigot in the bung hole and "close" to permit movement without spillage. Then transport the drum to the designated hold area and then "open", the spigot.
4. Drums in the segregated area must be inspected daily by Production Department supervisory personnel. A wooden stick may be used to poke through any crust formed on the liquid level within the drum to facilitate continued pressure release.
5. Experience has shown that pressure - venting is generally complete within 3 days. At the end of 3 days, return the drum, with a regular threaded bung in place, to the normally assigned hazardous waste drum storage area, being certain that proper labeling is still intact.

AR200529

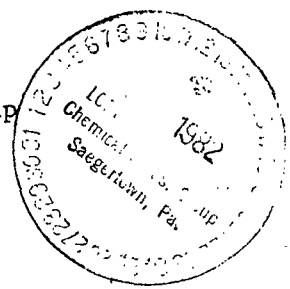


COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1012 Water Street
Meadville, Pennsylvania 16335
Telephone: A. C. 814/725-8526
July 12, 1982



Subject: Hazardous Waste Determination
Lord Corporation-Chemical Products Group
I.D. No. PAD048203822



Mr. Norman G. M'Sadoques
Chemical Buyer
Lord Corporation-Chemical Products Group
P.O. Box 566
Saegertown, Pennsylvania 16433-0556

Dear Mr. M'Sadoques:

Regarding your letter of June 7, 1982, in which you requested a determination of the proper hazardous waste number to be used on your manifests, I have consulted with the Department's chemist and our conclusions are as follows:

<u>Generator Code</u>	<u>Hazardous Waste Number</u>
L0	F003
1A;1B	F003
2A	F002 and F003
2B	F002 and F003
3A;3B	F002 and F003
4A	F003
4B	F002 ad F003

Manifesting these wastes under F002 and F003 will still indicate that the waste is ignitable, as the D001 listing does. In addition, this listig will indicate that the waste is toxic, which the D001 listing does not. The waste contains toxic heavy metals in addition to the solvents. During transportation the primary hazardous is ignitability, however, in the case of a spill it is essential, to know that toxic materials are present for the purposes of clean-up and disposal.

AR200530

Mr. Norman G. M' Sadoques

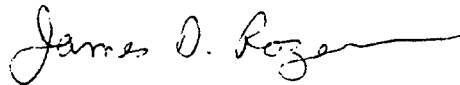
-2-

July 12, 1982

It is important to note that the regulations under Subsection 75.262(b)-Hazardous Waste Determination, require that if a waste can be placed under either the (h) listing or (g) listing, the (h) listing takes precedence in all cases.

If you have any questions regarding this determination, please feel free to contact me.

Sincerely,



James D. Rozakis
Solid Waste Specialist
Bureau of Solid Waste Management

JDR/csw

AR200531

Internal Note: Regulation 75.261 essentially states that a hazardous waste will be listed as ignitable if the flashpoint is less than 140^oF. The hazardous waste number associated with ignitability is D001 which is what we have been using. The regulation goes on to state that D001 is to be used if the waste is not further listed in subsection (h) which is a list of solvents grouped into categories. The problem with these categories is that no mention is made as to what levels the waste is to contain before being classified and manifested under the respective hazardous waste number. In essence, a case can be made for classification of our halogen containing materials in either D001 or F002 categories. I feel by soliciting a ruling on this by a representative of DER,

James D. Rozakis, Solid Waste Specialist
Department of Environmental Resources
Bureau of Solid Waste Management
1012 Water Street
Meadville, PA 16335

we will, in effect, be protecting ourselves from future classification problems.

June 7, 1982

Subject: Determination of Proper Hazardous Waste Number
use on our manifests

Reference: Your visit on May 14, 1982

*Send no
Permit
Fu 7/16*

Dear Jim:

Enclosed you will find waste product survey forms on all our halogen-containing drum wastes. The following is the list, by Generator code, of the waste product surveys enclosed:

<u>Generator Code</u>	<u>Description</u>
LO	Liquid Organic
1A;1B	Urethane Room/Reactor
2A	Adhesive Kady Mill
2B	Adhesive Sand Mill
3A;3B	Acrylic/Epoxy-Ross/Cowles
4A	Solid Urethane
4B	Solid Adhesive
4C	Solid Filter
5	Filtrate

I wish for you to review these and after which, communicate in writing your position on the proper hazardous number which you feel should be associated with these streams. I must also request your letter refer to each waste by Generator code number.

One point should be taken into consideration when making the evaluation, that is - each of these have a flash point below 100^oF. We still feel that this factor overrides the dangers of the small amount of halogens which appear essentially as contaminants.

Sincerely,

N.G. M'Sadoques
Chemical Buyer

AR200532
Fu 6/25

bcc: G.F. Metzinger, J.A. Boughton, S.M. Styborski, H.G. Boylan, Ross P O

CERTIFIED MAIL #P260 633 617

Benjamin J. Lammie, Solid Waste Specialist
Commonwealth of Pennsylvania
Department of Environmental Resources
1012 Water St.
Meadville, PA 16335

January 15, 1985

Subject: Meeting of January 8, 1985

Dear Ben:

This letter is to confirm topics discussed and agreed upon during our January 8 meeting:

1. All future shipments of NaBr/NaCl will be manifested as hazardous. We had been handling this bulk waste stream using the hazardous waste manifest system and essentially treating the material as a hazardous waste in all handling aspects, including disposal. The pH of this waste stream runs in the 12 to 13 range with the average being close to 13. Manifests completed in the future will reflect the hazard of this waste due to corrosivity.
2. You will forward to my attention official settlement papers assessing LORD/CPG \$250.00 for improper drum labeling observed during your October 2 site inspection.
3. DER has agreed to allow LORD/CPG to handle gas build-up which occurs in some of our waste drums by venting the CO₂ gas through the open bung hole. We will formulate an addition to our PP&C plan which will address specific handling and inspection procedures on drums which exhibit gassing. This plan is being drawn up by our plant safety engineer and should be completed by mid-February.

AR200533

PADER
January 15, 1985
Page Two

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

NGM/j

bcc:J. Thayer - Future manifests for NaBr/NaCl should be completed as follows: Waste Corrosive Liquid, N.O.S.

UN # None

Waste # D002 (c)

D.A. Parmeter, J.J. Szwarc, R.L. Miller, R.E. Polak, S.M. Styborski
J.A. Boughton, FU 2/15

AR200534

CERTIFIED MAIL #P260 633 617

Benjamin J. Lammie, Solid Waste Specialist
Commonwealth of Pennsylvania
Department of Environmental Resources
1012 Water St.
Meadville, PA 16335

January 15, 1985

Subject: Meeting of January 8, 1985

Dear Ben:

This letter is to confirm topics discussed and agreed upon during our January 8 meeting:

1. All future shipments of NaBr/NaCl will be manifested as hazardous. We had been handling this bulk waste stream using the hazardous waste manifest system and essentially treating the material as a hazardous waste in all handling aspects, including disposal. The pH of this waste stream runs in the 12 to 13 range with the average being close to 13. Manifests completed in the future will reflect the hazard of this waste due to corrosivity.
2. You will forward to my attention official settlement papers assessing LORD/CPG \$250.00 for improper drum labeling observed during your October 2 site inspection.
3. DER has agreed to allow LORD/CPG to handle gas build-up which occurs in some of our waste drums by venting the CO₂ gas through the open bung hole. We will formulate an addition to our PP&C plan which will address specific handling and inspection procedures on drums which exhibit gassing. This plan is being drawn up by our plant safety engineer and should be completed by mid-February.

AR200535

PADER
January 15, 1985
Page Two

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

NGM/j

bcc:J. Thayer - Future manifests for NaBr/NaCl should be completed as follows: Waste Corrosive Liquid, N.O.S.

UN # ~~None~~ *UN1760*
Waste # D002 (c)

*per HCB 1/17/85
committed to part T.*

D.A. Parmeter, J.J. Szwarc, R.L. Miller, R.E. Polak, S.M. Styborski
J.A. Boughton, FU 2/15

AR200536

LORD

Lord Corporation
Chemical Products Group
South Street
P. O. Box 556
Saegertown, Pa. 16433-0556
Telephone: 814-763-2345
Telex: 91-4445

9

CERTIFIED MAIL #P260 633 617

Benjamin J. Lammie, Solid Waste Specialist
Commonwealth of Pennsylvania
Department of Environmental Resources
1012 Water St.
Meadville, PA 16335

January 15, 1985

Subject: Meeting of January 8, 1985

Dear Ben:

This letter is to confirm ^{Topics} ~~that~~ discussed and agreed upon during our January 8 meeting:

1. All future shipments of NaBr/NaCl will be manifested as hazardous. We had been handling this bulk waste stream using the hazardous waste manifest system and essentially treating the material as a hazardous waste in all handling aspects, including disposal. ~~When the waste stream was characterized at the onset of RCRA, its pH was below 12.5. Apparently, the pH has crept up since that time and is now around 13.~~ Manifests completed in the future will reflect the hazard of this waste due to corrosivity. *The pH of this waste stream runs in the 12 to 13 range with the average being close to 13.*
2. You will forward to my attention official settlement papers assessing LORD/CPG \$250.00 for improper drum labeling. ~~This is as a result of discrepancies discovered~~ during your October 2 site inspection.
3. DER has agreed to allow LORD/CPG to handle gas build-up which occurs in some of our waste drums by venting the CO₂ gas through the open bung hole. ~~We understand that waste drums should remain covered during storage, but the safety hazard posed by pressure build-up is of great concern to LORD/CPG.~~ Thus, we will formulate an addition to our PP&C plan which will address ^{specific} ~~more~~ proactive handling and inspection procedures on drums which exhibit gassing. This plan is being drawn up by our plant safety engineer and should be completed by mid-February.

AR200537

JAB/NGM



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1012 Water Street
Meadville, Pennsylvania 16335
Telephone: A. C. 814/724-8526
February 20, 1985

CERTIFIED MAIL #P534 352 406

Subject: Lord Corporation,
Chemical Products Group
Borough of Saegertown
Crawford County
ID No. PAD048203822

Mr. Ronald L. Miller
Manager, Plant Operations
Lord Corporation
Chemical Products Group
P. O. Box 556
Saegertown, Pennsylvania 16433

Dear Mr. Miller:

I am forwarding three (3) copies of a Letter-Agreement in settlement of violations to the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, 35 P.S. §6018.101 et seq., and the Rules and Regulations adopted thereunder. These violations occurred on October 2, 1984 at Lord Corporation, Chemical Products Group, Saegertown, Pennsylvania.

Please sign all three (3) copies and return them to this office within twenty (20) days of your receipt thereof. You will receive an executed copy for your records after the document is signed on behalf of the Department of Environmental Resources.

The facts of the matter and terms of the settlement are as follows:

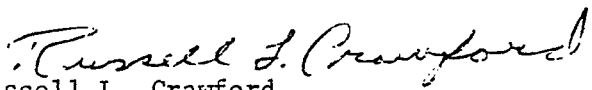
1. On October 2, 1984 fifty-nine (59) hazardous waste containers at Lord Corporation lacked complete Pennsylvania labels, in violation of Section 75.262(g)(1)(ii) of the Rules and Regulations, 25 Pa. Code §75.262(g)(1)(ii).
2. This violation constitutes unlawful conduct and a public nuisance pursuant to Sections 601 and 610(4) of the Solid Waste Management Act, 35 P.S. §§6018.601 and 6018.610(4).
3. By December 28, 1984, the violation had been abated.

AR200538

4. In settlement of all claims for monetary penalties assessable against Lord Corporation pursuant to Section 605 of the Solid Waste Management Act, 35 P.S. §6018.605, for the violation described in Paragraph 1 above, Lord Corporation agrees to pay a civil penalty of two hundred fifty dollars (\$250.00). This sum is a figure for settlement purposes only as set forth herein, and shall be due and payable upon execution of this Letter Agreement. The payment shall be submitted to the Department together with the signed copies of this Letter-Agreement and shall be in the form of a certified check or the like, made payable to the "Commonwealth of Pennsylvania, Solid Waste Abatement Fund" and shall be forwarded to Russell L. Crawford, Regional Solid Waste Manager, Bureau of Solid Waste Management, Department of Environmental Resources, 1012 Water Street, Meadville, Pennsylvania 16335.

5. In consideration of the above payment from Lord Corporation Chemical Products Group, the Department agrees not to initiate any action pursuant to Section 605 of the Solid Waste Management Act, 35 P.S. §6018.605, against Lord Corporation for the violation described in Paragraph 1 above; provided, however, that nothing in this letter-agreement shall be construed to relieve Lord Corporation from any future liability for environmental damage which may have resulted from the violations described herein.

Sincerely,


Russell L. Crawford
Regional Solid Waste Manager
Bureau of Solid Waste Management

RLC/BJL/11k

AR200539

APPROVED AS TO FORM AND LEGALITY:

Patti J. Saunders
Patti J. Saunders
Attorney for the Commonwealth

FOR THE DEPARTMENT OF
ENVIRONMENTAL RESOURCES:

FOR LORD CORPORATION
CHEMICAL PRODUCTS GROUP:

THE UNDERSIGNED STATE, SUBJECT TO THE
PENALTIES OF 18 PA. C.S.A. SECTION 4904
RELATING TO UNSWORN FALSIFICATION TO AUTH-
ORITY, THAT THEY ARE AUTHORIZED TO
CONSENT TO THE ENTRY OF THIS LETTER-AGREE-
MENT AND TO EXECUTE THIS LETTER-AGREEMENT
ON BEHALF OF LORD CORPORATION, CHEMICAL
PRODUCTS GROUP.

Russell L. Crawford Date
Regional Solid Waste Manager

Ronald L. Miller Date
Manager, Plant Operations

Patti J. Saunders Date
Attorney for the Commonwealth

AR200540



3/25 cc R.L. Miller
JAB
JJS

2c

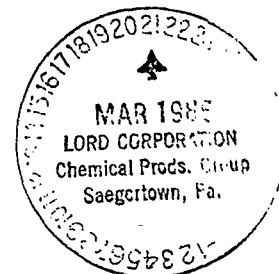
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1012 Water Street
Meadville, Pennsylvania 16335
Telephone: A. C. 814/724-8526
March 19, 1985



CERTIFIED MAIL #P534 352 174

Subject: Chloride/Bromide Sample Results
PPC Plan Amendment
Lord Corporation/C.P.G.
I.D. No. PAD048203822



Mr. Norman G. M'Sadoques, C.P.
Chemical Buyer
Lord Corporation
Chemical Products Group
Saegertown, Pennsylvania 16433-0556

Dear Mr. M'Sadoques:

Enclosed are the sample results taken from the chloride/bromide tank solution on January 8, 1985 and October 3, 1984 at Lord Corporation/C.P.G., Saegertown, Pa. As was agreed upon on January 8, 1985, this material is being handled as a hazardous waste.

In another matter, the proposed Preparedness, Prevention and Contingency (PPC) Plan amendment regarding the pressure release handling method has been reviewed. The current review is limited in scope and is not adequate because the Department does not have on file a PPC Plan for Lord Corporation/C.P.G. Therefore, the Department is requesting that Lord submit a copy of their PPC Plan to this office and provide the necessary information for understanding the aforementioned amendment in the context of the overall Plan.

I appreciate your patience in this matter, and should you have any questions regarding either the sample results or the request for the Plan, please feel free to contact me at this office.

Sincerely,

Benjamin J. Lammie
Benjamin J. Lammie
Solid Waste Specialist
Bureau of Solid Waste Management

BJL/csm

Enclosures

We are so saying

JJS What now?

AR200541

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
WATER OR WASTE QUALITY REPORT
ALL CHEMICAL ANALYSES MUST BE IN
MGA UNLESS OTHERWISE SPECIFIED

LAB. Number **4-00151**
Date Received **1/9/85**

ESTABLISHMENT Land Corporation		CASE Haystack Waste Determination	FACILITY Chloride/Bromide Tank		COLL NUMBER 2519
Municipality Cranford		PROGRAM SW	COLL NAME Ben Lammie	TYPE TR -	STD ANALYSIS 500
CARD (3)	ID CODE (ALL CARDS) 4-18	LATITUDE 4-10	LONGITUDE 11-18	DATE 19-24	TIME 25-28
1 2	Crnty Mun T Est Case Fed			M D Y	Hr Min
USGS-Q 30-34	BUREAU 35-37 AMIS	SAMPLE NUMBER 38-43	STREAM NAME 44-57	RELATIVE POINT 58	
	300	2619011		010885	10052

TRIBUTARY TO: _____
FULL DESCRIPTION WHERE SAMPLE TAKEN **Facilities chloride/Bromide Tank**

ADDITIONAL LAB ANALYSES **Na/Br**

Quit BR as per Telephone 1/11/85 J.E.

FIELD ANALYSES

Type Sample 59-60

Source of Sample 61-62

Reason Sampled 63-64

Composite Sample
Proportional Uniform 65
Temporal Spatial 66

Aliquots 67-68

Estimated Measured 69

Condition Above - 1 Normal - 2 Flood - 5
Below - 3 No Flow - 4 80

Stream Flow-CFS (00061)

Stream Flow-MGD (50051)

Pipe Flow-MGD (50050)

Gage Reading-Ft. (00065)

Temp (C) (00010)

pH (00400)

D.O. (00300)

Cl (50060)

Br (71871)

I (71866)

Spec Cond (00094)

Appearance (46001)

(01330)

LAB ANALYSES

Chemist _____ Date Analyzed _____

Color (00080)

Turb (00070)

pH (00403)

Spec. Cond (00095)

Alk (00470)

pH4 (00436)

pH8 Hot
Cold

T.O.C. (00680)

C.O.D. (00340)

5-Day BOD (00310)

T (00665)
TD (00666)

Al-Tot ug/l (01105)

Cd-Tot ug/l (01027)

Cr-Tot ug/l (01034)

Cu-Tot ug/l (01042)

Fe-Tot ug/l (01045)

Mn-Tot ug/l (01055)

Ni-Tot ug/l (01067)

Pb-Tot ug/l (01051)

Zn-Tot ug/l (01092)

DEPT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MGMT.
1012 WATER STREET
MEADVILLE, PA 16335
FEB 6 1985

RECEIVED

Total Solids (00500)

Susp. Solids (00530)

Set Solids (00545)

Total Diss Solids (00515)

NO₃-N (00615)

NO₂-N (00620)

NH₃-N (00610)

Kjel-N (00625)

Hardness (00900)

Ca (00916)

Mg (00927)

SO₄ (00945)

Cl (00940)

F (00951)

MBAS (38260)

Phenols ug/l Dr. (46002)
Ds (32730)

Cyanide (00720)

AR200542

CUSTODY LOG

How Shipped **Pure Water** Date **1/8/85**

Legal Seal No. **022812 / 024813**

Received by _____

Condition of Seal _____

SEWER AND WASTEWATER REPORT

SAMPLE NUMBER - 8500151

COLLECTOR - S. KAPLAN

COLLECTOR NO - 22619011

LAB - LORD COOP-CREM ERGD GROUP

NAME - HAZARDOUS WASTE DETERMIN.

FACILITY - CHLORIDE/AMMONIUM TANK

ID CODE - WDR STATION NUMBER - 500 SEAL INTACT

SAMPLING DATE - 1/08/85 TIME - 11:15 LAT - 50:00:00.0 LONG - 00:00:00.0

TYPE - 00 SOURCE - 00 STD ANAL - 500 RECEIVED DR - 1/09/85

SEAL NO(S) - 028812 028813

REPORT REVIEWED BY

DATE - 2/04/85

JRM

DEPT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MGMT.
1012 WATER STREET
MEADVILLE, PA. 16335

FEB 6 1985

RECEIVED

STORET	DESCRIPTION	RESULT	CONC	VERIFY BY	VERIFY DATE	COMM CODE
LABORATORY ANALYSIS :						
0009E	SPEC COND	185000.0000		G MCD	1/14/85	
0040Z	PH LAB	13.3000	MG/L	G MCD	1/09/85	
0051S	RES DISS/105	477440.0000	MG/L	G MCD	1/28/85	
00916	CA, TOTAL	1.0000	MG/L	G GLM	1/11/85	
00227	MG TOT MG/L	1.0000	MG/L	G GLM	1/11/85	
00929	NA, TOT MG/L	163000.0000	MG/L	G GLM	1/18/85	
00940	CHLORIDE	450000.0000	MG/L	G SGT	1/15/85	
00945	SO4 TOT	0.0000	MG/L	G REM	1/30/85	INTERFERENCE

SAMPLE COMMENTS

NO SAMPLE COMMENTS

TOTAL NUMBER TEST FOR THIS SAMPLE 8

AR200543

WATER AND WASTEWATER REPORT

SAMPLE NUMBER - B436255

COLLECTOR - GUY MC UMBER COLLECTOR NO - 2616108

ESTAB - LORD CORP CHEM. PROD.6P

CASE NAME - HAZARDOUS WASTE INSP.

FACILITY - CHLORIDE/BROMIDE TANK

ID CODE - NONE

WQI STATION NUMBER - 000

SEAL INTACT

SAMPLING DATE - 10/03/84 TIME - 11:44 LAT - 00:00:00.0 LONG - 00:00:00.0

TYPE - 00 SOURCE - 00 STD ANAL - 500 RECEIVED ON - 10/04/84

SEAL NO(S) 028679

REPORT REVIEWED BY

DATE - 2/01/85

J. C.

STORET	DESCRIPTION	RESULT	CONC	VERIFY BY	VERIFY DATE	COMM CODE
LABORATORY ANALYSIS :						
99007	SOILS/QUAL	0.0000	G	PAL	2/01/85	***SEE QUALITATIVE REPORT

SAMPLE COMMENTS

NO SAMPLE COMMENTS

ANALYST COMMENTS

STORET CODE

COMMENTS

ANALYST

99007S

E. P. TOX. RESULTS (PPM)

PAL

AS=0.016

BA=0.929

CD=<0.07

CR=0.124

PS=0.153

HG=<0.002

SE=<0.01

AG=<0.15

DEPT OF ENVIRONM.
BUREAU OF SOLID
WATER
ALLENTOWN, PA.
MAR 1 1985

RECEIVED

TOTAL NUMBER TEST FOR THIS SAMPLE

AR200545

Fu 3/6
SAR Fu 3/15
SAR Fu 3/27

Benjamin J. Lammie, Solid Waste Specialist
Commonwealth of Pennsylvania
Department of Environmental Resources
1012 Water St.
Meadville, PA 16335

February 18, 1985

Subject: PP&C Plan Amendment
Releasing Pressure Build-Up from Hazardous Waste Containers

Reference: My letter of January 15, 1985

Dear Mr. Lammie:

— HAS our amendment been accepted? No

As promised in my above referenced letter, we are herewith submitting our PP&C amendment to cover the handling of pressure build-up within drums of hazardous waste.

I request your review of this procedure and, if found to be acceptable, written acknowledgement to that effect.

Ben, this final piece of work by LORD brings us up to par with PADER expectations and corrects all discrepancies noted in your facilities inspection of October 2 and 3, 1984.

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

NGM/j

bcc: J.A. Boughton, R.L. Miller

RLM approved before mailing

AR200546

fu 3/7, 3/15

REGISTERED MAIL

Benjamin J. Lammie, Solid Waste Specialist
Commonwealth of Pennsylvania
Department of Environmental Resources
1012 Water St.
Meadville, PA 16335

July 25, 1985

Subject: 1. PP&C Plan (Updated)
2. Waste Generation

Dear Ben:

Resulting from your plant inspection in October 1984, we drafted and provided you with my February 18 letter an update to our PP&C Plan which addressed handling of pressure build-up with some of our hazardous waste drums.

In your March 19 letter, you informed me that our complete PP&C Plan was needed by your office in order to evaluate our amendment in context of our overall plan. Being we were in the process of updating our PP&C Plan, we opted, at that time, to await its completion.

Please review the enclosed Plan and send written acceptance of our amendment addressing gassing waste drums, Section XII.

We have also evaluated our waste streams and provided our TSDF's with updated WPS forms (Section 3-1) where needed. Please note the following EPA waste categories which will appear on our manifests:

F002
F003
F005
D007

D008
D002
U121
U154

AR200547

PADER
July 25, 1985
Page Two

Ben, please be aware that information contained in this PP&C is extremely confidential. Should our competition ever obtain the information, particularly on our raw materials, this would severely compromise the proprietary nature of our finished products. We look to everyone in PADER who comes in contact and needs to utilize the information herein to respect its confidential nature.

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

NQM/j

bcc: J.J. Szwarc, J.A. Boughton, R.L. Miller, fu 8/12

AR200548

Richard Watman, 3HW23
U.S. E.P.A.
841 Chestnut Blvd.
Philadelphia, PA 19107

April 6, 1987

Subject: Preliminary Assessment Report PA1542 for the
Hugson Chemical Company Plant Site

Dear Mr. Watman:

On February 11, 1987, we were inspected by PADER's Mark E. Gorman, Superfund Project Officer, Remedial Response Section, Division of Emergency & Remedial Response, Department of Environmental Resources, Meadville, PA office.

During this inspection, Mr. Gorman informed us that the report concerning our plant site would be filed with your office. I am herewith requesting a copy of that report under the Freedom of Information Act.

Please forward this document to my attention at the letterhead address at your earliest convenience.

Sincerely,

N.G. M'SAdoques, C.P.M.
Chemical Buyer

NGM/j

bcc: J. Boughton, R. Miller, G. Miller, E. Dalglish, J. Wright,
FU 4/17

AR200549

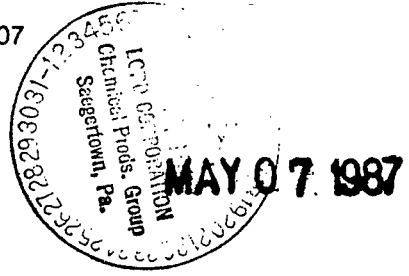


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

cc of A83 to
Ron Miller
Fu 7/5/87

5/19 m



TO: Mr. N.G. M'Sadoques, C.P.M.
Lord Corporation
Chemical Products Group
South Street
P.O. Box 556
Saegertown, PA 16433-0556

Dear Mr. M'Sadoques:

The following information and disposition are furnished concerning your request made under the Freedom of Information Act.

Date Request Received	<u>4/10/87</u>
Request Identification Number	<u>3 RIN-429-87</u>
(Estimated) Cost	<u>N/A</u>

- Positive Determination (Material enclosed).
- Your request of _____ modified as a result of a discussion with _____. See Remarks below.
- Holding Material Pending Receipt of Payment (estimated cost over \$100) or arrangement for payment.
- Fee Waived. Under \$25.00.
- Processing Request: Partial information included. Remaining information to be forwarded by _____.
- Processing Request: Extension until _____ needed due to _____
- Please see attached bill. Make check payable to U.S. Environmental Protection Agency. Put Request Identification Number (RIN) on check and mail to EPA-Region III, P.O. Box 360515M, Pittsburgh, PA 15251.

Remarks: The Preliminary Assessment for the Hughson Chemical Co. Plant site will not be available until the end of June, 1987. Please contact Ms. Pat Maguire (215) 597-3162, at that time to confirm that the report is available.

8/6/87 Iuy Biddle Information clerk
To call back w/ Report availability

Sincerely,

John Machita, Jr.
John Machita, Jr., Acting Chief
Site Support Section
Superfund Branch

AR200550

5/7 person responsible
Bernice Pasquini
not in will call back
Monday

7c

August 11, 1987

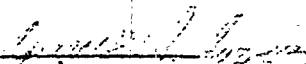
Ivy Biddle, Information Clerk
United States Environmental Protection Agency
Region 3
841 Chestnut Bldg.
Philadelphia, PA 19107

Subject: Preliminary Assessment Report PA1942 for the Hughson Chemical
Co. Plant Site - Identification No. BRIN-429-87

Dear Ms. Biddle:

This letter confirms our 8/6, 8/7 and 8/10 telecon in which I pursued receipt of the subject report which documents Mark E. Corman's inspection of our plant site performed on February 11, 1987. I will be in anxious anticipation of the subject report. Thank you for your assistance in this matter.

Sincerely,


W. G. M'Sadockes, C.P.A.
Chemical Buyer

WGM/m

cc: J. A. Boughton
E. C. Dalglish
E. A. Miller
R. L. Miller
J. W. Wright
FU 8/25/87

AR200551

LORD

2c
Lord Corporation
Chemical Products Group
South Street
P. O. Box 556
Saegertown, Pa. 16433-0556
Telephone: (814) 763-2345
TWX: 510-6952000

February 16, 1988

Pennsylvania Department of Environmental Resources
Bureau of Waste Management
P.O. Box 2063
Harrisburg, PA 17120

Re: Manifest #PAB5085555 (2/9/88)

Subject: Manifest Error

Gentlemen:

With this letter we are submitting corrected copy of manifest #PAB5085555 dated 02/09/88. A one drum error was made in 11.C. We shipped 9 drums not 8. The total quantity is then also adjusted from 3960 lbs to 4455 lbs.

Please correct all records.

Feel free to call if you have any questions.

Sincerely,


Norman G. M' Sadoques/QM

cc: Manifest

AR200552

JCC Bob Nipper
Cover letter only

Bob Note Copy Sent
to USEPA Region III
also 7/26

Pennsylvania Department of Environmental Resources
Bureau of Solid Waste Management
Division of Hazardous Waste Management
P.O. Box 2063
Harrisburg, PA 17120

July 22, 1988

SUBJECT: EPA Form 8700-12

Gentlemen/Ladies:

This subsequent notification is being forwarded to inform your office of additional waste categories shipped from our plant recently as part of a "Lab" clean out.

I believe the forms are complete as required and self explanatory.

Feel free to contact me if you have any questions.

Sincerely,

~~N. G. M. Sadoquis~~, C.P.M.
Chemical Buyer

NGM:jp
Enclosures

AR200553

SUPPLEMENT TO U.S. EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY FORM (EPA Form 870)

Installation's EPA I.D. Number

PAID 048203822

I. Name of Installation Lord Corporation Chemical Product Group

III. Location of Installation

Saeger Town

Municipality (Township, Borough, City)

Crawford

County

V. IRS Employer Identification Number

□□ - □□□□□□□□

V. SIC Codes (four-digit number in order of priority)

2851

Specify: Manufacture Coatings and adhesives

2891

Specify: Manufacture adhesives and sealants

2869

Specify: HAVE some specialty chemicals

□□□□

Specify: _____

VI. Type of Hazardous Waste Activity

- 1. Treater
- 2. Storer
- 3. Disposer
- 4. Reuse, Recycle, Reclaim
- 5. Permit by Rule

VII. Existing Environmental Permits

A. NPDES (Discharges to Surface Water)

PA 0101800 □□□□□□□□

D. PSD (Air Emissions from Proposed Sources)

□□□□□□□□□□□□□□

B. UIC (Underground injection of fluids)

□□□□□□□□□□□□□□

E. Municipal Waste (As defined in Act 97)

□□□□□□□□□□□□□□

C. RCRA (Hazardous Waste)

□□□□□□□□□□□□□□

F. Residual Waste (As defined in Act 97)

□□□□□□□□□□□□□□

G. Permit by Rule

Name of POTW _____

POTW NPDES Number

□□□□□□□□□□□□□□

AR200554

H. Other

□□□□□□□□□□□□□□

(Specify) _____



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1303 Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 665-4940

March 19, 1985

Ronald L. Miller, Manager
Plant Operations
Lord Corporation
Chemical Products Group
South Street
P. O. Box 556
Saegertown, PA 16433-0556

Dear Mr. Miller:

I have enclosed an executed copy of the Letter-Agreement concerning unlabelled hazardous waste containers.

Thank you for your cooperation.

Very truly yours,

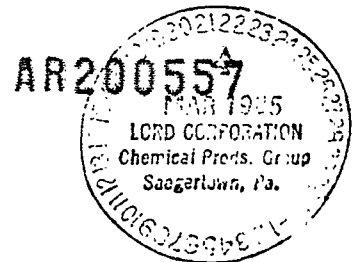
Patti J. Saunders

Patti J. Saunders
Assistant Counsel

PJS:kad

Enclosure

cc: Russell Crawford



1012 Water Street
Headsville, Pennsylvania 16335
Telephone: A. C. 814/724-7525
February 20, 1985

CERTIFIED MAIL #2534 352 406

Subject: Lord Corporation,
Chemical Products Group
Borough of Saegertown
Crawford County
ID No. PAS048203822

Mr. Ronald L. Miller
Manager, Plant Operations
Lord Corporation
Chemical Products Group
P. O. Box 556
Saegertown, Pennsylvania 16433

Dear Mr. Miller:

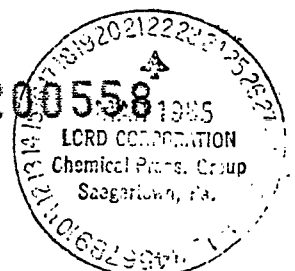
I am forwarding three (3) copies of a Letter-Agreement in settlement of violations to the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, 35 P.S. §6018.101 et seq., and the Rules and Regulations adopted thereunder. These violations occurred on October 2, 1984 at Lord Corporation, Chemical Products Group, Saegertown, Pennsylvania.

Please sign all three (3) copies and return them to this office within twenty (20) days of your receipt thereof. You will receive an executed copy for your records after the document is signed on behalf of the Department of Environmental Resources.

The facts of the matter and terms of the settlement are as follows:

1. On October 2, 1984 fifty-nine (59) hazardous waste containers at Lord Corporation lacked complete Pennsylvania labels, in violation of Section 75.262(e)(1)(ii) of the Rules and Regulations, 25 Pa. Code §75.262(e)(1)(ii).
2. This violation constitutes unlawful conduct and a public nuisance pursuant to Sections 601 and 610(4) of the Solid Waste Management Act, 35 P.S. §§6018.601 and 6018.610(4).
3. By December 29, 1984, the violation had been abated.

AR200558



Mr. Donald Miller

-3-

February 25, 1985

APPROVED AS TO FORM AND LEGALITY:

Patti J. Saunders
Patti J. Saunders
Attorney for the Commonwealth

FOR THE DEPARTMENT OF
ENVIRONMENTAL RESOURCES:

FOR LORD CORPORATION
CHEMICAL PRODUCTS GROUP:

THE UNDERSIGNED STATE, SUBJECT TO THE
PENALTIES OF 18 PA. C.S.A. SECTION 4904
RELATING TO UNLAWFUL FALSIFICATION TO AUTH-
ORITY, THAT THEY ARE AUTHORIZED TO
CONSENT TO THE ENTRY OF THIS LETTER-AGREE-
MENT AND TO EXECUTE THIS LETTER-AGREEMENT
ON BEHALF OF LORD CORPORATION, CHEMICAL
PRODUCTS GROUP.

Russell L. Crawford 3/11/85
Russell L. Crawford Date
Regional Solid Waste Manager

Ronald L. Miller 3/7/85
Donald L. Miller Date
Manager, Plant Operations

Patti J. Saunders 3/12/85
Patti J. Saunders Date
Attorney for the Commonwealth

AR200560

20
102

Stephen A. Colantino, Manager
Manifest Sub-Unit
Compliance Monitoring Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

May 10, 1984

Subject: Log N-G9
Your letter of April 10, 1984

Reference: #9420390041G
Manifest: #0864580

Dear Mr. Colantino:

I apologize for the untimely response. As you requested, attached is a copy of Manifest 0864580, Part 1, completed and returned by SCA.

Please feel free to call if you need additional information.

Sincerely,

N.G. M'Sadoques
Chemical Buyer

NGM/j

bcc: R.L. Miller, SCA P.O.

AR200561



217/785-2361

Refer to: 9420390041G -- PA
Segertown/Lord Corporation

April 10, 1984

Lord Corporation
South Street
Segertown, PA 16433

Attention: Plant Manager

Dear Sir:

We are currently involved in reconciling the State Manifest Delinquent Report for hazardous waste. Our records indicate that, as of this date, we have not received the copy -- Part 2 (Site Copy) for the following manifest(s) used in the transportation of special waste generated at your facility:

<u>Manifest No.</u>	<u>Date Shipped</u>
0864580	10/04/83

SCA Chem. Serv. (03160058) has been contacted in an attempt to resolve the apparent Part 2 discrepancy, but there is also a need to determine if the site has returned the completed original Part 1 to you.

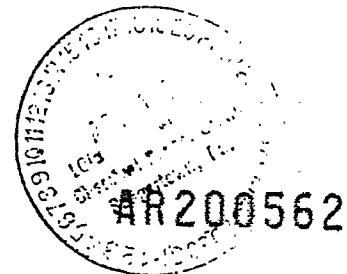
At this time I am requesting that you review your files to determine if the original(s) (Part 1) has been returned to you. If the original(s) is on file, please forward a photocopy to me. If Part 1 has not been returned to you, specify so in writing. Due to the importance of this matter, I am requesting you respond as directed within 15 days of the letter date. On all responses, please refer to Log N-G9.

Sincerely,

Stephen A. Colantino, Manager
Manifest Sub-Unit
Compliance Monitoring Section
Division of Land Pollution Control

SAC:b1s/0760D

cc: Greg Zak, Compliance Assurance Unit
Division File
Northern Region



TO BE COMPLETED BY WASTE GENERATOR

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

060000

Authorization Number 8 13

LORD CORPORATION
CHEMICAL PRODUCTS GROUP

SOUTH STREET

8 1 4 7 6 3 2 3 4 5 9 4 2 0 3 9 0 0 4 1 6

(Company Name)

Address

Phone Number

14

Generator Number

24

HAEGERTOWN

PENNSYLVANIA 16433

P A D O 4 8 2 0 3 8 2 2

City

State

Zip

EPA Number

WASTE HAULER(S)

SCA

P.O. BOX 200
MODEL CITY, NY 14107

S.W.H. Registration Number 0 5 4 4 0 2 2

Hauler Name

Hauler Address

NY D O 4 9 8 3 6 6 7 9

7 1 6 7 5 4 8 2 3 1

M X XXXX XXXX XXXX XXXX

Phone Number

EPA Number

Hauler Name

Hauler Address

S.W.H. Registration Number 32 38

Phone Number

EPA Number

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

SCA CHEMICAL SERVICE

11700 SOUTH STONEY ISLAND AVENUE

0 3 1 6 0 0 5 8

(Facility Name)

Address

39

Site Number

46

CHICAGO

ILLINOIS

60617

31 26 4 6 57 00

1 LD 0 0 0 6 7 2 1 2 1

City

State

Zip

Phone Number

EPA Number

Alternate (Facility Name)

Address

39

Site Number

46

City

State

Zip

Phone Number

EPA Number

TO BE COMPLETED BY WASTE GENERATOR

1A/1B

WASTE NAME: URETHANE ROOM REACTOR SCA CODE 1139004 WASTE PHASE: LIQUID

(Liquid, Gaseous, Solid)

SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION: HAZARD CLASS:

WASTE FLAMMABLE LIQUID N.O.S. FLAMMABLE LIQUID

U N 1 9 9 3
UN or NA Number

F. 0 0 3
EPA HW Number

WEIGHT FOR D.O.T. USE 30000 LBS (circle one) TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0 0 3 3 0 0 47 52

(1) GALLONS (Circle One) 1
(2) CU. YDS. 1

METHOD OF SHIPMENT (Circle One) (DRUMS 60) TANK TRUCK OPEN TRUCK OTHER (Specify) VAN

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

H.G. BOYLAN (Authorized Signature)

DATE: 10-4-83

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) Dennis Homan (Authorized Signature)

DATE: 10/04/83

(2) (Authorized Signature)

DATE: / /

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES NO L

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

P. Newton (Authorized Signature)

DATE: 10/05/83

COMMENTS OR SPECIAL INSTRUCTIONS:

AR200563

James Sibbald Moran, P.E.
Supervisor, Manifest Section
Bureau of Hazardous Waste Operations
Division of Solid & Hazardous Waste
New York State Department of Environmental Conservation
P.O. Box 12820
Albany, NY 12212

June 3, 1986

Subject: Manifest Document #NYA4022133
Shipped to CECOS International, Inc. on 4/30/86

Reference: Your letter of May 20, 1986

Dear Mr. Moran:

By the time of this writing, you should have received your copies of the subject manifest. We were slightly tardy in sending this particular manifest out.

Please call me at the letterhead phone number if you have not received the document.

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

NGM/j

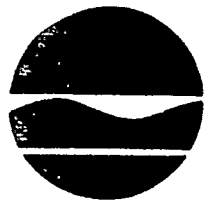
bcc: CECOS P.O.
Manifest

AR200564

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001



MAY 20, 1986



Henry G. Williams
Commissioner

LORD INCORPORATED
PO BOX 556
SAEGERTOWN, PA 16433

EPA ID NUMBER : PAD048203822
REFERENCE CODE NO.: 0

RE: MANIFEST DOCUMENT NUMBER NYA4022133
SHIPPED TO CECOS INTERNATIONAL INC
SHIPPED ON 04/30/86

DEAR SIR:

OUR RECORDS INDICATE THAT WE HAVE NOT RECEIVED COPY 6 OR 7 FOR THE ABOVE REFERENCED HAZARDOUS WASTE SHIPMENT.

IN ACCORDANCE WITH 6NYCRR PART 372.2 (b)(3), NEW YORK STATE HAZARDOUS WASTE REGULATIONS, A GENERATOR IS REQUIRED TO SEND COPY 6 OR 7 OF THE MANIFEST FORM TO NEW YORK STATE WHEN THE SHIPMENT IS INITIATED.

A GENERATOR WHO DOES NOT FULFILL THESE REQUIREMENTS MAY BE SUBJECT TO A FINE OF UP TO \$25,000 AS SPECIFIED IN ECL S71-27-5.

PLEASE FORWARD COPY 6 OR 7 OF THE ABOVE REFERENCED MANIFEST TO:

NYS DEC - DIVISION OF SOLID AND HAZARDOUS WASTE
MANIFEST SECTION
P.O. BOX 12820
ALBANY, NY 12212

SINCERELY,

JAMES SIBBALD MORAN, P.E.
SUPERVISOR, MANIFEST SECTION
BUREAU OF HAZARDOUS WASTE OPERATIONS
DIVISION OF SOLID AND HAZARDOUS WASTE

AR200565

bcc: H. Boylan, H. Trautman, J. Boughton

Note to both Harrys - It is important that we investigate sequence of events that have led up to this particular occurrence and document preventative measures which will be utilized to avoid a future repeat.

James Sibbald Moran, P.E.
Supervisor, Manifest Section
Bureau of Hazardous Waste Operations
Division of Solid and Hazardous Waste
New York State Department of Environmental Conservation
Manifest Section
P.O. Box 12820
Albany, NY 12212

May 16, 1986

Subject: LORD Manifest Document NYA4022096

Reference: Your letter of May 7, 1986

Dear Mr. Moran:

In acknowledgment to your above referenced letter received at our office on May 12, I am herewith forwarding Copy 3 - Generator - mailed by TSD facility - of the subject manifest. This is the completed copy of the manifest showing both ours, the transporter's and the TSD's signatures. It appears that the original set of manifest copies that remained within our facility which includes the copies that are normally mailed to your office have been lost in transit between our Traffic Department and our Purchasing Department.

We are thus utilizing this TSD's completed copy to maintain our files covering this particular hazardous waste shipment. Of the hundreds of manifests issued from our facility in a year's time, spanning the many years since the inception of the manifest system, this is the first occurrence where our internal copies have been mislaid. This error has been brought to the attention of appropriate individuals within our organization and should never occur again.

Please feel free to call me should you have any additional questions.

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

NGM/j

AR200566

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Form Approved. OMB No. 2000-0404. Expires 7-31-96.

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. **P A D 0 4 8 2 0 3 8 2 2 2 2 0 9 8**
Manifest Document No.

2. Page 1 of **1** Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address
Lord Corporation, Chemical Products Group
P.O. Box 556, South St., Saegertown, PA 16433
4. Generator's Phone (**814**) **763-2345**

A. State Manifest Document No. **NY A 402209 8**
B. Generator's ID **Same**

5. Transporter 1 (Company Name) **Cecos International, Inc**
6. US EPA ID Number **NY D 0 8 0 3 3 6 2 4 1**

C. State Transporter's ID **054759**
D. Transporter's Phone (**716**) **873-4200**

7. Transporter 2 (Company Name)
8. US EPA ID Number

E. State Transporter's ID
F. Transporter's Phone ()

9. Designated Facility Name and Site Address
Cecos International, Inc.
56th St. & Niagara Falls Blvd.
Niagara Falls, NY 14303
10. US EPA ID Number **NY D 0 8 0 3 3 6 2 4 1**

G. State Facility's ID
H. Facility's Phone (**716**) **282-2676**

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers No. Type
13. Total Quantity
14. Unit (Wt/Vol) Waste No.

a. **RQ, Waste Spent Sulfuric Acid (Phenol, Sulfuric Acid) Corrosive Material UN1832** **A** **1** **T T** **4 0 0 0 0** **P** **D007**

b.

c.

d.

J. Additional Descriptions for Materials listed Above

K. Handling Codes for Wastes Listed Above

a. **Liquid C**

a. b.

b.

b. c.

15. Special Handling Instructions and Additional Information
APPROXIMATELY 0.5% SOLIDS BY WEIGHT (SUPERFUND TAX)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002 (b) of RCRA, I also certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name **Harry G. Boylan, Traffic Manager** Signature *Harry G. Boylan* Mo. Day Year **10 4 1 7 8 6**

17. Transporter 1 (Acknowledgement of Receipt of Materials)
Printed/Typed Name **Richard Goodman** Signature *Richard Goodman* Mo. Day Year **10 4 1 7 8 6**

18. Transporter 2 (Acknowledgement or Receipt of Materials)
Printed/Typed Name Signature Mo. Day Year

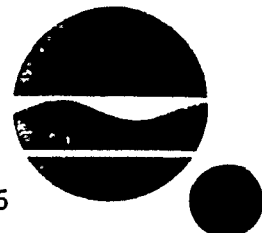
19. Discrepancy Indication Space **AR200567**

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name **DAVID P JAROSZEWSKI** Signature *David Jaroszewski* Mo. Day Year **10 4 1 7 8 6**

Department of Transportation (518) 457-7752

NY A 402209 8

New York State Department of Environmental Conservation



MAY 07, 1986

Henry G. Williams
Commissioner



LORD INCORPORATED
PO BOX 556
SAEGERTOWN, PA 16433

EPA ID NUMBER : PAD048203822
REFERENCE CODE NO.: 0

RE: MANIFEST DOCUMENT NUMBER NYA4022098
SHIPPED TO CECOS INTERNATIONAL INC
SHIPPED ON 04/17/86

DEAR SIR:

OUR RECORDS INDICATE THAT WE HAVE NOT RECEIVED COPY 6 OR 7 FOR THE ABOVE REFERENCED HAZARDOUS WASTE SHIPMENT.

IN ACCORDANCE WITH 6NYCRR PART 372.2 (b)(3), NEW YORK STATE HAZARDOUS WASTE REGULATIONS, A GENERATOR IS REQUIRED TO SEND COPY 6 OR 7 OF THE MANIFEST FORM TO NEW YORK STATE WHEN THE SHIPMENT IS INITIATED.

A GENERATOR WHO DOES NOT FULFILL THESE REQUIREMENTS MAY BE SUBJECT TO A FINE OF UP TO \$25,000 AS SPECIFIED IN ECL S71-27-5.

PLEASE FORWARD COPY 6 OR 7 OF THE ABOVE REFERENCED MANIFEST TO:

NYS DEC - DIVISION OF SOLID AND HAZARDOUS WASTE
MANIFEST SECTION
P.O. BOX 12820
ALBANY, NY 12212

SINCERELY,

JAMES SIBBALD MORAN, P.E.
SUPERVISOR, MANIFEST SECTION
BUREAU OF HAZARDOUS WASTE OPERATIONS
DIVISION OF SOLID AND HAZARDOUS WASTE

AR200568

James Sibbald Moran, P.E.
Supervisor, Manifest Section
NYS DEC
P.O. Box 12820
Albany, NY 12212

October 17, 1984

Subject: New York Manifest No. NY1149381
Reference Code No. 19
Letter of Manifest Discrepancy dated October 5, 1984
(received October 15, 1984)

Dear Mr. Moran:

As requested in your subject letter, I am herewith returning a copy of the subject manifest with the necessary corrections. Please rest assured that future manifests will be typed correctly.

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

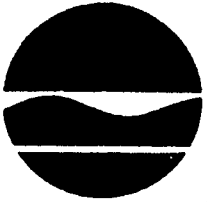
NGM/j

bcc: H.G. Boylan, J. Thayer, J.A. Boughton, CECOS Blanket

} All w/attachments

AR200569

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001



Henry G. Williams
Commissioner

October 5, 1984

Lord Corporation
P.O. Box 556
South Street
Saegertown, Pennsylvania 16433

EPA ID No.: PAD048203822
Manifest Document No.: NY1149381
Reference Code No.: 19

Dear Sir:

You have improperly used a Uniform Hazardous Waste Manifest. The misuse of a manifest is a violation of State and Federal Regulations.

Based on a review of your submitted manifest, we found the following violations:

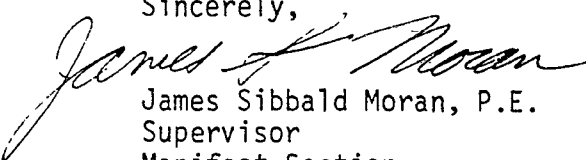
- Use of the wrong State's manifest. You must use the Disposer State's manifest.
- Use of a Hazardous Waste Manifest is not allowed for solely non-hazardous waste.
- See the photocopy of the manifest for errors in omissions or coding.

A letter explaining why these violations occurred and a correction of errors indicated is required to be returned to this office within five (5) days of receipt of this letter. Failure to comply with manifest regulations could result in fines and/or criminal action.

If you need assistance, please contact the Manifest Section at telephone number 518/457-0530. Correspondence should be addressed to:

NYS DEC - Manifest Section
P.O. Box 12820
Albany, NY 12212

Sincerely,


James Sibbald Moran, P.E.
Supervisor
Manifest Section

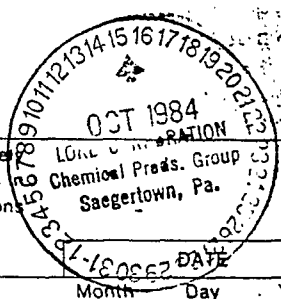


STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE
HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

Form Approved. OMB No. 2000-0404. Expires 7-31-85

19

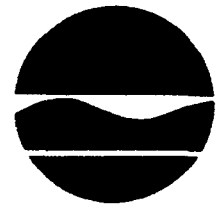
Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA No. PA D 0 4 8 2 0 3 8 2 2 4 9 3 8 1		Manifest Document No. 1		2. Page 1 of 1		Information in the shaded areas is not required by Federal Law.		
3. Generator's Name and Mailing Address LORD CORPORATION, CHEMICAL PRODUCTS GROUP P.O. BOX 556, SOUTH STREET, SAEGERTOWN, PA 16433						A. State Manifest Document No. NY A 114938 1				
4. Generator's Phone (814 763-2345)						B. State generator's ID SAME				
5. Transporter 1 (Company Name) CECOS INTERNATIONAL, INC.				6. US EPA ID Number NY D 0 8 0 3 3 6 2 4 1		C. State Transporter's ID NY 165162		D. Transporter's Phone (716 873-4200)		
7. Transporter 2 (Company Name)						E. State Transporter's ID				
9. Designated Facility Name and Site Address CECOS INTERNATIONAL, INC. 56th STREET & NIAGARA FALLS BLVD. NIAGARA FALLS, NY 14303						10. US EPA ID Number NY D 0 8 0 3 3 6 2 4 1		G. State Facility's ID		
						H. Facility's Phone (716) 873-4200				
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Unit		14. Waste No.
a. RQ, WASTE SPENT SULFURIC ACID (PHENOL, METHANOL, SULFURIC ACID)						No. 00		Type ITTT 4-0-0-0-P		Quantity APPROX. 1000
b. CORROSIVE MATERIAL UN1832										DOOR
										KEEP ENTRIES WITHIN LINES
d. BE SURE TO VALIDATE ALL OTHER INFO.										
J. Additional Descriptions for Materials listed Above						K. Handling Codes for Wastes Listed Above				
a.						a. <input type="checkbox"/>				
b.						b. <input type="checkbox"/>				
15. Special Handling Instructions and Additional Information						APPROXIMATELY 0.5% SOLIDS BY WEIGHT (SUPERFUND TAX)				
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects proper condition for transport by highway according to applicable international and national governmental regulations and state laws and regulations.										
Printed/Typed Name HARRY G. BOYLAN, TRAFFIC MANAGER				Signature <i>Harry G. Boylan</i>		Month 9 Day 27 Year 84				
17. Transporter 1 (Acknowledgement of Receipt of Materials)				Printed/Typed Name Bob MacDermott		Signature <i>Bob MacDermott</i>		Month 9 Day 27 Year 84		
18. Transporter 2 (Acknowledgement or Receipt of Materials)				Printed/Typed Name		Signature		Month DATE MISSING Day 9 Year		
19. Discrepancy Indication Space						AR200571				
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						DATE				
Printed/Typed Name				Signature		Month		Day Year		

COPY NEED WASTE No.

NYA 114938 1

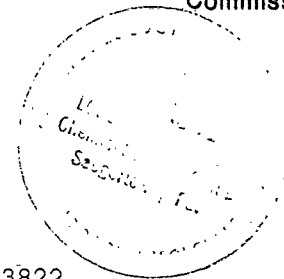
New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233 -0001



Robert F. Flacke
Commissioner

May 27, 1982

Hughson Chemicals
Route #198 South Street
Saegertown, Pennsylvania 16433



Re: PAD048203822

Dear Sir:

Our records indicate that we have not received Part A for manifest document number NY2308671 & NY2308698 & PA0591345 & PA0591369 & PA059141 PA0591382 & PA0592393 & NY2308662 & PA0591334 & PA0591356 & PA0591371 & PA059140

In accordance with 6NYCRR Part 365.2(b)(2), a generator is required to send a copy of Part A of the manifest form to the State when the shipment is initiated. Also, in accordance with 6NYCRR Part 365.2(c)(3), the generator is required to file an exception report with the State if he has not received a copy of the Part B from the disposal facility within 20 days of shipment.

A generator who does not fulfill these requirements may be subject to a fine of up to \$25,000 as specified in ECL § 71-2705.

Please notify the New York State Department of Environmental Conservation, Division of Solid Waste, Manifest Section at (518) 457-6858 within 24 hours regarding the status of this shipment and forward a copy of the Part A [redacted] to:

New York State
Department of Environmental Conservation
P.O. Box 15628
Albany, NY 12212

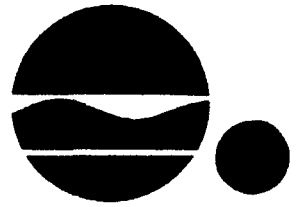
Mark [unclear]

Sincerely,

David A. Blackman, P.E.
Supervisor, Manifest Section
Bureau of Hazardous Waste Operations
Division of Solid Waste

AR200573

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233 -0001



Robert F. Flacke
Commissioner

March 23, 1982

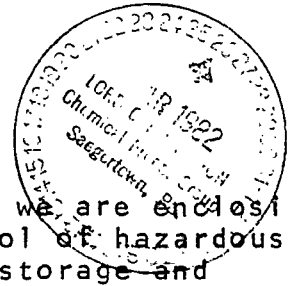
*Please Pull any FU'S
Now*

Mr. N. G. M'Sadoques
Chemical Buyer
Chemical Products Group
Lord Corporation
South Street
P.O. Box 556
Saegertown, PA 16433

Dear Mr. M'Sadoques:

Re: Hazardous Waste Rules and Regulations

In accordance with your request of March 9, we are enclosing copies of the rules and regulations on the control of hazardous waste generation, transportation and treatment, storage and disposal.



We do require that wastes disposed of in New York State be manifested on a New York State form or another acceptable form. At present only those forms used by Pennsylvania, New Jersey, Delaware or Puerto Rico are considered acceptable. They are identical in format which is necessary for computerization of data. This decision was reached after a series of public hearings conducted throughout New York State in June 1981. The rules were filed with the Secretary of State of the State of New York on January 18, 1982 and became effective on March 9, 1982.

Sincerely,

Lawrence J. Tierney
Lawrence J. Tierney
Assistant Sanitary Engineer
Bureau of Hazardous Waste Operations
Division of Solid Waste

Enclosures

AR200574



3/23
L. J. ...
Fu 4/14

Norman Nosenchuck
New York State Dept.
of Environmental Conservation
50 Wolf Road
Albany, NY 12233

March 9, 1982

Subject: Hazardous Waste Rules and Regulations

Dear Mr. Nosenchuck:

The purpose of this letter is to request information on how to obtain a copy of the Rules and Regulations on Hazardous Waste, published by your department.

As generators of such, we employ the service of TSD Facilities based in your state. It has been brought to my attention, that as of this date, your department requires any waste entering New York be manifested either on New York State or Pennsylvania State forms. Up to this time, we had been using manifests of our own design, which of course, incorporated all the proper information. I would like to know what prompted your department to make such a ruling, and also why it was necessary to make it go into effect only one week after signing into law. This hardly gives enough time for the public to become aware of the law, much less comply.

Please send Rules and Regulations information as soon as possible, so we may study them and assure we are in full compliance.

Sincerely,

N. G. M'Sadoques
Chemical Buyer

NGM/s

bcc: G. F. Metzinger, J. A. Boughton, H. G. Boylan, FU 3/23

AR200575

OHIO ENVIRONMENTAL PROTECTION AGENCY
CONSENT TO JURISDICTION OF THE COURTS OF THE STATE
OF OHIO AND CONSENT TO SERVICE OF PROCESS

CALENDAR YEAR 19 89

Waste Category

This form pertains to (check all that apply):

- Infectious Waste
 Solid Waste
 Hazardous Waste



In accordance with the requirements of Section 3734.131
Ohio Revised Code (O.R.C.), I,

Norman M'Sadoques, state as follows:

1. I am duly authorized to give the consent and waiver described in this document on behalf of, and am executing and filing this document on behalf of, the following person (please initial the applicable section):

Myself.

Myself as sole proprietor of the following sole proprietorship:

Name: Norman M'Sadoques, Chemical Buyer

Address: Lord Corporation, Chemical Product Group

P.O. Box 556, South Street

Saegertown PA 16433
City State Zip Code

The following corporation, association, firm, partnership, trust, governmental entity, or other person as the term "person" is defined in O.R.C. Section 1.59(C):

Name: _____

Address: _____

City State Zip Code

AR200576

2. The person identified in paragraph 1 of this Consent to Service, on whose behalf this consent is executed is a person identified in paragraphs (A)(1)(a) through (A)(1)(d) of Section 3734.131 of the Ohio Revised Code, and specifically is (Please initial the applicable section or sections):

- (A) _____ The person who actually transports the waste, (e.g., driver).
- (B) _____ The person who employs the person described in 2(A), (e.g., trucking company).
- (C) _____ A person who has contracted with the transporter for the transportation of the waste to a facility in Ohio.
- (D) NM'S NM'S _____ A person who has contracted with the owner or operator of the Ohio facility to which the wastes will be transported for treatment, transfer, storage, or disposal.

3. The person identified in paragraph 1 of this Consent to Service is a(n) (Please initial the applicable section or sections):

- | | | | |
|---|------------------------|--------------------------------|---------------------|
| <input checked="" type="checkbox"/> _____ | Individual | <input type="checkbox"/> _____ | Sole Proprietorship |
| <input type="checkbox"/> _____ | Partnership | <input type="checkbox"/> _____ | Corporation |
| <input type="checkbox"/> _____ | Other. Identify: _____ | | |

4. On behalf of the person identified in paragraph 1 of this Consent to Service, I hereby irrevocably consent to the jurisdiction of the courts of the State of Ohio for and in any civil or criminal proceeding arising out of or relating to waste that is shipped to a facility in the State of Ohio;

* 5. On behalf of the person identified in paragraph 1 of this Consent to Service, I hereby irrevocably consent to the service of process in the State of Ohio, including without limitation, service of summons or subpoena, for and in any criminal or civil proceeding arising out of or relating to waste that is shipped to a facility in the State of Ohio, and state that such service shall be complete and effective when service of process is made upon the following agent designated within the State of Ohio, at the following Ohio address:

Designated Ohio Agent: Lord Corporation

Ohio Address: _____

4644 Wadsworth Road

Dayton OH 45414
City State Zip Code

and provided that service is made upon the designated agent in accordance with those Ohio Rules of Civil Procedure in a civil proceeding, or those Ohio Rules of Criminal Procedure in a criminal proceeding, which civil or criminal rules govern service of process upon a person within the State of Ohio;

* 6. On behalf of the person identified in paragraph 1 of this Consent to Service, I hereby waive all rights of federal or state law inconsistent with the above consent, including rights as to extradition, as to territorial limits for service of summons under Ohio Criminal Rule 4(D)(2), and as to procedures set forth in the Uniform Act to Secure the Attendance of Witnesses From Without a State in Criminal Proceedings, O.R.C. Section 2939.25 et seq., except that I waive no rights under O.R.C. 2939.28 or O.R.C. 3734.131(A)(4).

Signed *Norman M'Sadoques* Date 1/12/89

Typed or Printed Name Norman M'Sadoques

Title: Chemical Buyer

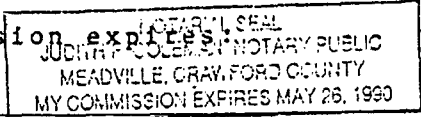
Address: Lord Corporation, Chemical Product Group

P.O. Box 556, South Street

Saegertown PA 16433
City State Zip Code

Sworn to and subscribed before me 12th Seal or Authority
this day of January 12th, 1989

Judith A. Colem
Notary Public

My commission expires 
Member, Pennsylvania Association of Notaries

* Notwithstanding any of the provisions of this Consent to Jurisdiction and Service of Process form, the signatory does not waive any federal or state, statutory or constitutional, rights, defenses, or privileges which are not lawfully and expressly required to be waived under the provisions of O.R.C. S3734.131. Furthermore, the signatory reserves the right to challenge any provisions of O.R.C. S3734.131 which violates federal or state, constitutional or statutory, provisions or rights.

AR200578

James M. Riddell, Air Section Chief
State of Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

April 9, 1987

Subject: Robert Ross & Sons, Inc. - Permit

Dear Mr. Riddell:

My records show that Ross' permit to operate an air contaminant source (#1947050278N001) will expire on May 7, 1987. Please provide me with a copy of the reissuance of this permit.

Thank you.

Sincerely,

N.G. M'Sadoques, C.P.M.
Chemical Buyer

NGM/j

bcc: FU 5/5

AR200579

CERTIFIED MAIL

Gloria L. Gaylord
Public Utilities Commission of Ohio
180 East Broad St.
Columbus, OH 43215

August 14, 1984

Subject: Transportation Permit #329-HW
Case #84-858-TR-CID

Dear Ms. Gaylord:

Relative to the subject transportation permit obtained under the name of Hughson Chemicals/LORD Corporation, please be aware this was a temporary permit. The need for hauling in Ohio ended in February 1982. Please remove us from your "active" list.

Sincerely,

N.G. M'Sadoques
Chemical Buyer

NGM/j

bcc: Ohio EPA File
Rock Creek File

AR200580

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of Hazardous Waste)
Stamp Payment for the year)
1984-1985 as required by Section)
3745-53-11 Ohio Administrative) Case No. 84-858-TR-CID
Code)

CITATION ORDER

The Commission, coming now to consider the above-entitled matter, finds:

- 1) Pursuant to Section 3734.02 Ohio Revised Code, and 3745-53-11, Ohio Administrative Code hazardous waste carriers with this Commission must purchase hazardous waste I.D. stamps annually prior to January 31 of each calendar year.
- 2) The companies listed have failed to purchase hazardous waste I.D. stamps for the year 1984-1985 which was due on or before the last day of January 1984.
- 3) Each of the companies listed in the Order are hereby given formal notice to rectify such delinquency within thirty (30) days from the date of this Order.
- 4) Any company listed herein shall pay its I.D. cab card fee for the year 1984-1985, within thirty (30) days from the date of this Order or show cause why the Commission should not revoke that company's registration.

AR200581

HALL'S MOTOR TRANSIT
1553 FRANK ROAD
COLUMBUS OH 43223
368-HW

HANCHAR INDUSTRIAL WASTE MANAGEMENT, INC.
3651 N. CLINTON ST.
FT. WAYNE IN 46805
373-HW

RALPH F. HARTMAN
DBA: HARTMANS TRUCKING
P.O. BOX 421
BROADWAY VA 22815
75-HW

HAZARD MATERIALS TRANSPORTATION
11101 MOSTELLER ROAD
CINCINNATI OH 45246
596-HW

HAZARDOUS WASTE DISPOSAL, INC.
1 SHORE ROAD
P.O. BOX 329
GLENWOOD LANDING NY 11547
588-HW

H.E.A.T., INC.
4628 W. WALTON BLVD.
DRAYTON PLAIN MI 48020
341-HW

HERITAGE POLLUTION CONTROL, INC.
26 HYDELOR AVENUE
P. O. BOX 7227
PROSPECT CT 06712
353-HW

HERRON TRANSFER CO.
1026 FRANKLIN ST
P.O. BOX 116
SALEM OH 44460
78-HW

HISKO TRUCKING CO., INC.
24 BUCKINGHAM AVE
PERTH AMBOY NJ 08846
537-HW

HL-NIW, INC.
2321 KENMORE AVENUE
KENMORE NY 14217
571-HW

HOBART CORPORATION
920 LAFAYETTE ROAD
MEDINA OH 44256
418-HW

HUGHSON CHEMICALS/LORD CORPORATION
SOUTH STREET
SAEGERTOWN PA 16433
329-HW

HYDROSOL SYSTEM, INC.
4216 KARG INDUSTRIAL PKWY.
BRIMFIELD OH 44240
462-HW

AR200582

It is, therefore,

ORDERED, That the foregoing findings be observed and that each of the carriers listed be notified of this Order.

THE PUBLIC UTILITIES COMMISSION OF OHIO

Michael D. Bane
Chairman

John R. Schick

Gloria L. Gaylord

Commissioners

Commissioners

If you have any questions concerning this Order, call
(614) 466-7259.

Entered in the Journal

AUG 07 1984

A True Copy

Mary Ann Orłinski

Mary Ann Orłinski
Secretary

AR200583



Re: Cuyahoga County
Robert Ross & Sons, Inc. Waste

Mr. J.A. Full
Chemical Buyer
c/o Hughson Chemicals - Lord Corporation
P.O. Box 556 - South Street
Saegerton, PA 16433

December 30, 1981



Dear Mr. Full:

This letter is in answer to your letter of 2 December 81. The reason for the delay in answering is that I had asked our Hazardous Waste Unit for help in answering a portion of your inquiry.

The Norton Construction Company landfill will be re-licensed for the year 1982 by the Cuyahoga County Health Department as far as I know. That department has not informed me otherwise.

Our Hazardous Waste Unit stated that, for the time being, the incinerator residue from Robert Ross & Sons, Inc., will continue to be disposed of at the CECOS site in southwestern Ohio. The residue has not been deemed non-hazardous and as such cannot be disposed of in a conventional landfill.

If there are any other questions please contact me at any time.

Yours truly,

Jack L. Burgan, R.S.
District Solid Waste Scientist

JLB:psj

cc: J. Speakman, R.S., OLPC/CO
R. Moore, R.S., Cuyahoga County Health Department
M. Becker, OEPA-NEDO

AR200584

James M. Riddell, Air Section Chief
State of Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

January 17, 1984

Subject: Robert Ross & Sons, Inc. - Permit

Dear Mr. Riddell:

My records show that Ross' permit to operate an air contaminant source (#1947050278N001) will expire on May 7, 1984. Please provide me with a copy of the reissuance of this permit.

Thank you.

Sincerely,

N.G. M'Sadoques
Chemical Buyer

NGM/j

FU 5/15/84

AR200585

Jack L. Burgan, R.S.
District Solid Waste Scientist
State of Ohio EPA
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

December 2, 1981

Subject: Robert Ross & Sons, Inc. Permit -
Landfill of Incinerator Residue

Reference: Your letter of May 7, 1981

Dear Mr. Burgan:

According to your May 7 letter, the Norton Construction Company permit to operate a landfill is valid through December 31, 1981. Has this permit been extended?

Please issue your written reply as promptly as possible regarding status of this landfill to receive Ross incinerator residue.

Thank you for your cooperation.

Most sincerely,

J.A. Full
Chemical Buyer

JAF
cc: J.A. Boughton, Ross A07979, FU 12-28

AR200586

54
OhioEPA

December 22, 1981

J. A. Full
Chemical Buyer
Hughson Chemicals
Lord Corporation
P.O. Box 556
Saegertown, Pa. 16433

cc J. FULL
METZ
ROSS A07979
MWAY
NMS
12/28/81

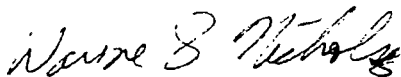
Dear Mr. Full:

I wish to thank you for your comments regarding Robert Ross & Sons, Incorporated and their proposal to establish a hazardous waste landfill in Wayne County, Ohio.

Your comments will be taken into account by the Agency's Division of Hazardous Materials and the Hazardous Waste Facility Approval Board when we consider action on their permit application.

Again, thank you for expressing your concerns.

Very truly yours,



Wayne S. Nichols
Director

WSN/vjw
80000.0

cc: Charles J. Wilhelm, Chief, DHM
Peggy Vince, Executive Director, HWFAB

AR200587

Wayne Nichols, Director-Ohio EPA
361 East Broad Street
P.O. Box 1049
Columbus, OH 43216

December 1, 1981

Dear Mr. Nichols:

The purpose of this letter is express our support for the "Hawkridge Landfill" in Wayne County, Ohio which Robert Ross & Sons, Inc. of Grafton, Ohio have proposed to operate.

Our Company has utilized the incineration facilities of Robert Ross and Sons, Inc. for almost 10 years. Ross has always conducted their business affairs in the most ethical manner, and has never fallen prey to operating by "expediency". Based upon my personal inspection of their facilities in Grafton, Ohio on several occasions and many meetings with the principals (Maureen Crowley, Gary Ross, Dennis Ross and others), Lord Corporation has significant confidence that the Ross organization conducts its activities in accordance with and even beyond the "bare minimum" of all regulatory requirements. We believe Ross complies with both the letter and the spirit of the law.

It is my understanding Ross began the permitting procedure for the Hawkridge Landfill in September of 1977. Final authorization to operate this facility has not yet been granted. As a representative of the industrial community, I would like to emphasize our need for secure landfill sites operated by companies such as Ross in an environmentally sound manner. I solicit your aid in obtaining regulatory approval for the Hawkridge Landfill.

Sincerely,

J.A. Full
Chemical Buyer

bcc: J.A. Boughton, G.F. Metzinger,
M.J. Way, Ross A07979, Full 200588

JAF/j

cc: Maureen H. Crowley, Robert Ross & Sons, Inc. 394 Giles
Road, Grafton, Ohio 44044

AR200588

James M. Riddell, Air Section Chief
State of Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

April 21, 1981

Subject: Permit - Robert Ross & Sons, Inc.

Reference: Your May 13, 1980 reply to my letter of April 2, 1980

Dear Mr. Riddell:

Per my April 2, 1980 request, you provided me with a copy of the Robert Ross permit issued by the Ohio EPA on May 6, 1980.

I note that permit is effective until May 6, 1981. I would like to receive a copy of the renewal permit to operate an air contaminant source.

Thank you for your cooperation in this matter.

Sincerely,

J.A. Full
Chemical Buyer

~~_____/j~~
bcc: J.A. Boughton, FU 5-11-81

AR200589

Ohio EPA

cc: JAB
SFM
Mark Way
A05737

1 copy to FU 2/1/81
(letter only)

Note Section C - Sampling Program
" " F sub 5

May 13, 1980

FU 4/6/81

Mr. J. A. Full
Hughson Chemicals
Lord Corporation
P.O. Box 556
Saegertown, Pennsylvania 16433

Dear Mr. Full:

Please find enclosed a copy of Robert Ross' Permit, issued by the Ohio EPA on May 6, 1980.

Yours truly,

James M. Riddell
(cc)

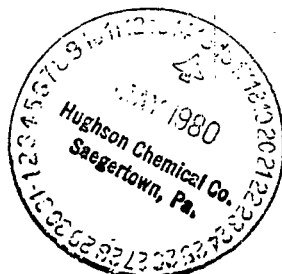
James M. Riddell
Air Section Chief

JMR:c11

Enclosure

Ref: My 4/2/80 letter request

New letters to Riddell -
Air Per
Park - Norton
Landfill
perm



AR200590

Permit to Operate an Air Contaminant Source

Terms and Conditions

Date of Issuance May 6, 1980Application Number 1947050278 N001Effective Date May 6, 1980Permit Fee \$50

This document constitutes issuance to:

ROBERT ROSS INDUSTRIAL DISPOSAL INC
394 GILES ROAD
GRAFTON, OHIO 44044

of a permit to operate:

LIQUID INDUSTRIAL WASTE INCINERATOR
THERMAL OXIDIZER #7

The following terms and conditions are hereby expressly incorporated into this permit to operate:

Condition 1

The above described air contaminant source is now operating, and over the period covered by the permit will be operated, in full compliance with all applicable state and federal laws and regulations.

Condition 2

Prior to any physical change in, or change in the method of operation of, this air contaminant source which increases the amount of any air pollutant emitted, or results in the emission of any air pollutant not previously emitted, a permit to install must be granted by the Ohio Environmental Protection Agency (See Chapter 3745-31 of the Ohio Administrative Code).

Condition 3

The Director of the Ohio Environmental Protection Agency, or his authorized representative, may enter upon the premises of the source operation at any reasonable time and subject to safety requirements of the person in control of the premises for the purpose of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants and determining compliance with all applicable State and Federal air pollution laws and regulations and the terms and conditions of this permit.

Condition 4 (This condition applicable if checked:)

Upon declaration of an Air Pollution Alert, Warning or Emergency Episode this air contaminant source will follow those emission reduction procedures enumerated in the Emergency Action Plan approved by the Director for this source.

Condition 5This permit to operate shall be effective until May 6, 1981. You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to this agency.**Condition 6**

A permit fee in the amount specified above must be remitted within fifteen (15) days of the effective date of this permit.

Condition 7

Any transferee of this permit shall, personally, assume the responsibilities of the original permit holder-transferor. The Ohio EPA must be notified in writing of any transfer of this permit.

Condition 8 (This condition is applicable if checked:)

This permit is subject to the supplementary conditions attached.

OHIO ENVIRONMENTAL PROTECTION AGENCY

James F. McQuay

 Director



AR200591

SPECIAL TERMS AND CONDITIONS

- I. Application Number: 1947050278 N001
- II. Facility Name: Robert Ross & Sons, Inc.
- III. Company I.D.: Thermal Oxidizer #7
- IV. Equipment Description: Liquid Industrial Waste Incinerator
- V. Special Terms and Conditions:

A. OPERATING PARAMETERS

1. Temperature Restrictions

- a. The thermocouple located at the midpoint of the length of the furnace chamber shall be operated and continuously monitored by means of a recording temperature indicator at all times while the thermal oxidizer is in operation. The thermocouple and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- b. An additional thermocouple located near the outlet of the furnace chamber shall be maintained operational while the thermal oxidizer is in operation and shall be connected to a temperature indicator so that the temperature can be periodically recorded, however, the temperature need not be continuously recorded.
- c. A spare thermocouple, which in the event of a thermocouple failure, can be used to replace the faulty thermocouple, shall be maintained in inventory.
- d. The furnace temperature, as indicated by the thermocouple located at the midpoint of the length of the furnace chamber, shall be maintained at a temperature in excess of 1900°F at all times while the thermal oxidizer is in operation except during periods of start up and shutdown. A controlled fuel feed device shall be installed on the thermal oxidizer to maintain the temperature. The start up period shall be considered to extend for a period of one hour from the time of flame ignition. The shutdown period shall be a period ten minutes prior to flame-out.
- e. A quarterly operating temperature report is to be submitted by Robert Ross and Sons, Incorporated to the Ohio EPA Northeast District Office and copied to the Ohio EPA, Office of Air Pollution Control Hazardous Waste Coordinator. The operating temperature report shall contain as a minimum, the date, time of occurrence, cause explanation and action taken for any temperature variations below combustion temperature requirements as described in A.2.



AR200592

- f. All temperature data obtained by the recording temperature indicator shall be maintained on file at the facility for a period of at least two (2) years. Such data shall be made available for inspection by any official of the Ohio EPA, Office of Air Pollution Control, upon request.

2. Operation of Scrubber

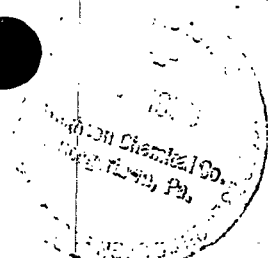
- a. The multi stage scrubber shall be maintained in operation at all times while the thermal oxidizer is in operation except as provided by OAC 3745-15-06 and except during periods of start up as defined by A.l.d. provided that no chlorinated hydrocarbons are incinerated during the start-up period.
- b. The liquid sodium hydroxide solution addition to the scrubbing liquor, and other operating parameters of the thermal oxidizer and scrubber system, shall be adjusted and controlled so that the scrubbing liquor at the outlet of the scrubber is maintained at pH 7 or greater at all times while the thermal oxidizer is in operation except for periods of start up or shutdown as specified in paragraph A.l.d. The pH of the scrubbing liquor at the outlet of the scrubber shall be checked at least every two (2) hours with a pH sensitive paper capable of indicating to at least the nearest whole pH value, or other equally accurate device. The pH of the ponds should also be sampled at least twice a day since any large fluctuations in the ponds pH may be indicative of the need for large changes in the rate of liquid sodium hydroxide solution make up or other operating parameters. This data shall be maintained on file at the facility for a period of at least two (2) years. Such data shall be made available for inspection by any official of the Ohio EPA, Office of Air Pollution Control, upon request.
- c. An inventory of spare parts shall be maintained (such as scrubber nozzles, scrubber pumps and valves, pump motors, pump bushings and bearings, pump valve seals and packings, fan bearings, motor to pump couplings or belts, motor to fan couplings or belts) in order to avoid prolonged shutdown of the thermal oxidizer because of scrubber equipment failure.

3. Safeguards

Safeguard devices shall exist so that if any portion of the scrubbing system shall inadvertently fail, the thermal oxidizer shall immediately cease to operate. The thermal oxidizer and scrubber system shall include safeguards as follows:

- a. The system is wired in series so that failure of all functional motors in the scrubbing system will result in immediate shutdown of the thermal oxidizer; and
- b. A thermocouple is installed at the exit duct of the quench chamber and will immediately shut down the thermal oxidizer if temperature exceeds 300°F.

AR 200593



B. LIMITATIONS ON WASTE FUEL STOCK AND WATER WASTE

Robert Ross and Sons, Incorporated, at the Giles Road facility, shall comply with all local, state, and federal laws and regulations including but not limited to the Toxic Substances Control Act of 1979. No polychlorinated biphenyl's (PCBs) in excess of 50 p.p.m. and no herbicides, pesticides, rodenticides or insecticides except as, otherwise authorized by applicable laws and regulations will be incinerated at the Giles Road facility.

C. SAMPLING PROGRAM

1. Robert Ross and Sons, Incorporated, shall allow access to the Giles Road facility for the purpose of random unannounced sampling as determined necessary by the Ohio EPA.
2. Robert Ross and Sons, Incorporated shall have on-site a composite liquid waste sampler, which meets USEPA and Ohio EPA specifications, for use by Ohio EPA personnel. Robert Ross and Sons, Incorporated shall maintain a supply of sampler replacement parts and provisions for sampler cleaning.
3. Within 30 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall submit for approval to the Ohio EPA a plan for the routine sampling and laboratory analysis of incoming wastes for the purpose of preventing polychlorinated biphenyls, PCBs, from being disposed of in the thermal oxidizer. The plan shall include as a minimum:
 - a. A copy of the standard supplier contract which prohibits the delivery of any PCBs to the Giles Road facility,
 - b. A copy of a negotiated (signed) contract for PCB analysis from a laboratory approved by the Ohio EPA.
 - c. A list of suppliers which will be routinely sampled, the frequency of sampling, sampling procedures and the rationale for these selections.
 - d. Provisions for submitting monthly a composite sample from each designated supplier to the approved laboratory.
4. All laboratory analysis shall be reported to Robert Ross and Sons, Incorporated directly from the laboratory and retained on-site and available for inspection by the Ohio EPA for a minimum of two years. An analysis which reports any concentration of PCBs shall be reported immediately to the Ohio EPA.
5. Upon notification or receipt of any laboratory analysis which confirms a PCB concentration greater than, or equal to, 5 parts per million (ppm), in the composite sample of a supplier, Robert

AR200594

Ross and Sons, Incorporated shall immediately discontinue incineration of all wastes received from that supplier. This prohibition shall remain in effect until written authorization is received from the Ohio EPA.

D. COMPLIANCE RESPONSIBILITY

Possession of any permit to operate shall not relieve Robert Ross and Sons, Incorporated, of the responsibility to comply with applicable air pollution emission limitations and regulations or with any applicable Federal, State or local laws, rules, regulations, codes, ordinances, or orders.

E. MALFUNCTION REPORTING AND SCHEDULED MAINTENANCE

Robert Ross and Sons, Incorporated shall comply with the malfunction and scheduled maintenance requirements of OAC Rule 3745-15-06.

F. RECORDS OF MATERIALS RECEIVED

1. A record of materials received for disposal at the Giles Road facility shall be maintained by Robert Ross and Sons, Incorporated. The record shall contain as a minimum:
 - a. Name of the company from which the material was received.
 - b. Address and location of the facility from which the material was received.
 - c. Date the material was received.
 - d. Identification of the vehicle(s) transporting the material including the PUCO identification number and the state license number.
 - e. Amount of material and type of container.
 - f. Description of material including chemical composition.
2. The record of all material received at the Giles Road facility shall be kept on file at the facility for at least two (2) years. The record shall be available for inspection by the Ohio EPA.

G. BY-PASS

1. Within 30 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall install an interim fuel supply system to be operated during use of the by-pass. This system shall consist at a minimum of conditions, G,2-a. and G,2-b.
2. Within 90 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall submit for approval to the Ohio EPA a plan for the operation of the incinerator during use of the by-pass. The plan shall include as a minimum:

AR200595

- a. A fuel source isolated from the normal waste feed.
- b. Provisions whereby the fuel source does not contain more than 0.5% halogen, the chemical composition is verifiable and approved by the Ohio EPA.
- c. Either monitoring system or a design specification whereby the use of the alternate fuel source during the use of the by-pass can be verified.
- d. A detailed description of installation and operation.
- e. Proposed dates for placement of equipment orders, equipment delivery, installation and start-up.

H. ODOR CONTROL SYSTEM

1. Within 90 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall submit for approval to the Ohio EPA a plan for a continuous system designed to eliminate odors during the process of emptying drums and tankers. The plan shall include as a minimum:
 - a. A detailed description of installation and operation.
 - b. Proposed dates for placement of equipment orders, equipment delivery, installation and start-up.
 - c. A closed system for eliminating odors during the process of transferring materials from tank trucks to storage facilities.
2. Within 120 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall submit for approval to the Ohio EPA a plan for a storage tank odor control system. The plan shall include as a minimum:
 - a. A detailed description of installation and operation.
 - b. Proposed dates for placement of orders, equipment delivery, installation and start-up.

VI. The plans required in Conditions C.3, G.2, H.1 and H.2 are to be submitted to the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087 with a copy to the Hazardous Materials Coordinator, Ohio EPA, Office of Air Pollution Control, 361 East Broad Street, Columbus, Ohio 43215.

VII. This permit may be revoked at any time pursuant to the requirements of OAC 3745-35-02 (F).



AR200596

Ohio EPA

cc: JAB
SFM
Mark Way
A05737

1 copy to FU 2/1/81
(letter only)

Note Section C - Sampling Program
" " F sub 5

May 13, 1980

Mr. J. A. Full
Hughson Chemicals
Lord Corporation
P.O. Box 556
Saegertown, Pennsylvania 16433

Dear Mr. Full:

Please find enclosed a copy of Robert Ross' Permit, issued by the Ohio EPA on May 6, 1980.

Yours truly,

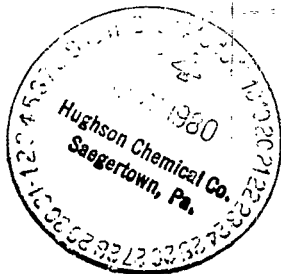
James M. Riddell
(cc)

James M. Riddell
Air Section Chief

JMR:c11

Enclosure

Ref: My 4/2/80 letter request



AR200597

Permit to Operate an Air Contaminant Source

Terms and Conditions

Date of Issuance May 6, 1980Application Number 1947050278 N001Effective Date May 6, 1980Permit Fee \$50

This document constitutes issuance to:

ROBERT ROSS INDUSTRIAL DISPOSAL INC
394 GILES ROAD
GRAFTON, OHIO 44044

of a permit to operate:

LIQUID INDUSTRIAL WASTE INCINERATOR
THERMAL OXIDIZER #7

The following terms and conditions are hereby expressly incorporated into this permit to operate:

Condition 1

The above described air contaminant source is now operating, and over the period covered by the permit will be operated, in full compliance with all applicable state and federal laws and regulations.

Condition 2

Prior to any physical change in, or change in the method of operation of, this air contaminant source which increases the amount of any air pollutant emitted, or results in the emission of any air pollutant not previously emitted, a permit to install must be granted by the Ohio Environmental Protection Agency (See Chapter 3745-31 of the Ohio Administrative Code).

Condition 3

The Director of the Ohio Environmental Protection Agency, or his authorized representative, may enter upon the premises of the source operation at any reasonable time and subject to safety requirements of the person in control of the premises for the purpose of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants and determining compliance with all applicable State and Federal air pollution laws and regulations and the terms and conditions of this permit.

Condition 4 (This condition applicable if checked:)

Upon declaration of an Air Pollution Alert, Warning or Emergency Episode this air contaminant source will follow those emission reduction procedures enumerated in the Emergency Action Plan approved by the Director for this source.

Condition 5This permit to operate shall be effective until May 6, 1981. You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to this agency.**Condition 6**

A permit fee in the amount specified above must be remitted within fifteen (15) days of the effective date of this permit.

Condition 7

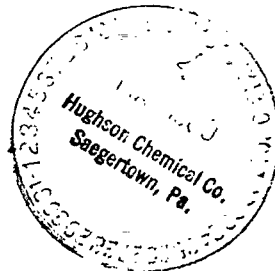
Any transferee of this permit shall, personally, assume the responsibilities of the original permit holder-transferor. The Ohio EPA must be notified in writing of any transfer of this permit.

Condition 8 (This condition is applicable if checked:)

This permit is subject to the supplementary conditions attached.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director



AR200598

SPECIAL TERMS AND CONDITIONS

Application Number: 1947050278 N001

II. Facility Name: Robert Ross & Sons, Inc.

III. Company I.D.: Thermal Oxidizer #7

IV. Equipment Description: Liquid Industrial Waste Incinerator

V. Special Terms and Conditions:

A. OPERATING PARAMETERS

1. Temperature Restrictions

- a. The thermocouple located at the midpoint of the length of the furnace chamber shall be operated and continuously monitored by means of a recording temperature indicator at all times while the thermal oxidizer is in operation. The thermocouple and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- b. An additional thermocouple located near the outlet of the furnace chamber shall be maintained operational while the thermal oxidizer is in operation and shall be connected to a temperature indicator so that the temperature can be periodically recorded, however, the temperature need not be continuously recorded.
- c. A spare thermocouple, which in the event of a thermocouple failure, can be used to replace the faulty thermocouple, shall be maintained in inventory.
- d. The furnace temperature, as indicated by the thermocouple located at the midpoint of the length of the furnace chamber, shall be maintained at a temperature in excess of 1900°F at all times while the thermal oxidizer is in operation except during periods of start up and shutdown. A controlled fuel feed device shall be installed on the thermal oxidizer to maintain the temperature. The start up period shall be considered to extend for a period of one hour from the time of flame ignition. The shutdown period shall be a period ten minutes prior to flame-out.
- e. A quarterly operating temperature report is to be submitted by Robert Ross and Sons, Incorporated to the Ohio EPA Northeast District Office and copied to the Ohio EPA, Office of Air Pollution Control Hazardous Waste Coordinator. The operating temperature report shall contain as a minimum the time of occurrence, cause explanation and action taken for any temperature variations below combustion temperature requirements as described in A.2.

Highland Chemical Co.
P.O. Box 100
Piquette, Pa.

AR200599

- f. All temperature data obtained by the recording temperature indicator shall be maintained on file at the facility for a period of at least two (2) years. Such data shall be made available for inspection by any official of the Ohio EPA, Office of Air Pollution Control, upon request.

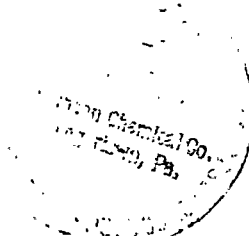
2. Operation of Scrubber

- a. The multi stage scrubber shall be maintained in operation at all times while the thermal oxidizer is in operation except as provided by OAC 3745-15-06 and except during periods of start up as defined by A.l.d. provided that no chlorinated hydrocarbons are incinerated during the start-up period.
- b. The liquid sodium hydroxide solution addition to the scrubbing liquor, and other operating parameters of the thermal oxidizer and scrubber system, shall be adjusted and controlled so that the scrubbing liquor at the outlet of the scrubber is maintained at pH 7 or greater at all times while the thermal oxidizer is in operation except for periods of start up or shutdown as specified in paragraph A.l.d. The pH of the scrubbing liquor at the outlet of the scrubber shall be checked at least every two (2) hours with a pH sensitive paper capable of indicating to at least the nearest whole pH value, or other equally accurate device. The pH of the ponds should also be sampled at least twice a day since any large fluctuations in the ponds pH may be indicative of the need for large changes in the rate of liquid sodium hydroxide solution make up or other operating parameters. This data shall be maintained on file at the facility for a period of at least two (2) years. Such data shall be made available for inspection by any official of the Ohio EPA, Office of Air Pollution Control, upon request.
- c. An inventory of spare parts shall be maintained (such as scrubber nozzles, scrubber pumps and valves, pump motors, pump bushings and bearings, pump valve seals and packings, fan bearings, motor to pump couplings or belts, motor to fan couplings or belts) in order to avoid prolonged shutdown of the thermal oxidizer because of scrubber equipment failure.

3. Safeguards

Safeguard devices shall exist so that if any portion of the scrubbing system shall inadvertently fail, the thermal oxidizer shall immediately cease to operate. The thermal oxidizer and scrubber system shall include safeguards as follows:

- a. The system is wired in series so that failure of all functional motors in the scrubbing system will result in immediate shutdown of the thermal oxidizer; and
- b. A thermocouple is installed at the exit duct of ~~the~~ **AR200600** chamber and will immediately shut down the thermal oxidizer if temperature exceeds 300°F.



B. LIMITATIONS ON WASTE FUEL STOCK AND WATER WASTE

Robert Ross and Sons, Incorporated, at the Giles Road facility, shall comply with all local, state, and federal laws and regulations including but not limited to the Toxic Substances Control Act of 1979. No polychlorinated biphenyl's (PCBs) in excess of 50 p.p.m. and no herbicides, pesticides, rodenticides or insecticides except as, otherwise authorized by applicable laws and regulations will be incinerated at the Giles Road facility.

C. SAMPLING PROGRAM

1. Robert Ross and Sons, Incorporated, shall allow access to the Giles Road facility for the purpose of random unannounced sampling as determined necessary by the Ohio EPA.
2. Robert Ross and Sons, Incorporated shall have on-site a composite liquid waste sampler, which meets USEPA and Ohio EPA specifications, for use by Ohio EPA personnel. Robert Ross and Sons, Incorporated shall maintain a supply of sampler replacement parts and provisions for sampler cleaning.
3. Within 30 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall submit for approval to the Ohio EPA a plan for the routine sampling and laboratory analysis of incoming wastes for the purpose of preventing polychlorinated biphenyls, PCBs, from being disposed of in the thermal oxidizer. The plan shall include as a minimum:
 - a. A copy of the standard supplier contract which prohibits the delivery of any PCBs to the Giles Road facility,
 - b. A copy of a negotiated (signed) contract for PCB analysis from a laboratory approved by the Ohio EPA.
 - c. A list of suppliers which will be routinely sampled, the frequency of sampling, sampling procedures and the rationale for these selections.
 - d. Provisions for submitting monthly a composite sample from each designated supplier to the approved laboratory.
4. All laboratory analysis shall be reported to Robert Ross and Sons, Incorporated directly from the laboratory and retained on-site and available for inspection by the Ohio EPA for a minimum of two years. An analysis which reports any concentration of PCBs shall be reported immediately to the Ohio EPA.
5. Upon notification or receipt of any laboratory analysis which confirms a PCB concentration greater than, or equal to, 5 parts per million (ppm), in the composite sample of a supplier, Robert

AR200601

Ross and Sons, Incorporated shall immediately discontinue incineration of all wastes received from that supplier. This prohibition shall remain in effect until written authorization is received from the Ohio EPA.

D. COMPLIANCE RESPONSIBILITY

Possession of any permit to operate shall not relieve Robert Ross and Sons, Incorporated, of the responsibility to comply with applicable air pollution emission limitations and regulations or with any applicable Federal, State or local laws, rules, regulations, codes, ordinances, or orders.

E. MALFUNCTION REPORTING AND SCHEDULED MAINTENANCE

Robert Ross and Sons, Incorporated shall comply with the malfunction and scheduled maintenance requirements of OAC Rule 3745-15-06.

F. RECORDS OF MATERIALS RECEIVED

1. A record of materials received for disposal at the Giles Road facility shall be maintained by Robert Ross and Sons, Incorporated. The record shall contain as a minimum:
 - a. Name of the company from which the material was received.
 - b. Address and location of the facility from which the material was received.
 - c. Date the material was received.
 - d. Identification of the vehicle(s) transporting the material including the PUCO identification number and the state license number.
 - e. Amount of material and type of container.
 - f. Description of material including chemical composition.
2. The record of all material received at the Giles Road facility shall be kept on file at the facility for at least two (2) years. The record shall be available for inspection by the Ohio EPA.

G. BY-PASS

1. Within 30 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall install an interim fuel supply system to be operated during use of the by-pass. This system shall consist at a minimum of conditions, G,2-a. and G,2-b.
2. Within 90 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall submit for approval to the Ohio EPA a plan for the operation of the incinerator during use of the by-pass. The plan shall include as a minimum:

AR200602

- a. A fuel source isolated from the normal waste feed.
- b. Provisions whereby the fuel source does not contain more than 0.5% halogen, the chemical composition is verifiable and approved by the Ohio EPA.
- c. Either monitoring system or a design specification whereby the use of the alternate fuel source during the use of the by-pass can be verified.
- d. A detailed description of installation and operation.
- e. Proposed dates for placement of equipment orders, equipment delivery, installation and start-up.

H. ODOR CONTROL SYSTEM

1. Within 90 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall submit for approval to the Ohio EPA a plan for a continuous system designed to eliminate odors during the process of emptying drums and tankers. The plan shall include as a minimum:
 - a. A detailed description of installation and operation.
 - b. Proposed dates for placement of equipment orders, equipment delivery, installation and start-up.
 - c. A closed system for eliminating odors during the process of transferring materials from tank trucks to storage facilities.
2. Within 120 days, of the effective date of this permit, Robert Ross and Sons, Incorporated shall submit for approval to the Ohio EPA a plan for a storage tank odor control system. The plan shall include as a minimum:
 - a. A detailed description of installation and operation.
 - b. Proposed dates for placement of orders, equipment delivery, installation and start-up.

VI. The plans required in Conditions C.3, G.2, H.1 and H.2 are to be submitted to the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087 with a copy to the Hazardous Materials Coordinator, Ohio EPA, Office of Air Pollution Control, 361 East Broad Street, Columbus, Ohio 43215.

VII. This permit may be revoked at any time pursuant to the requirements of OAC 3745-35-02 (F).

AR200603



4/21/80 - no reply
Send Copy
Fu 5/5/80

5/6 - no reply
Send copy
Fu 5/27/80

David A. Woodring, Chief
Air Pollution Control
State of Ohio EPA
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

April 2, 1980

Subject: Robert Ross & Sons, Inc., Grafton, Ohio

Reference: Your 12/15/78 letter.

Dear Mr. Woodring:

Since our discussions in December of 1978, we have continued and intend to continue business transactions with Robert Ross & Sons, Inc.

Please provide a copy of their current permit to operate the thermal incinerator and a copy of their authority to dispose of, by land fill, ash and solid materials generated from their operation.

I would also like a statement regarding Ross's current relationship with the Ohio EPA.

Thank you for your prompt attention.

Sincerely,

J. A. Full
Chemical Buyer

JAF:jm

cc: JAB, Mark Way, FU 4/21/80, JAF and File

AR200604

FU 4/21 5/1

Ohio EPA

Re: Cuyahoga County
Norton Landfill

cc: GFM

JAB
MS Way
Ross PO A07970



May 7, 1981

Mr. J.A. Full, Chemical Buyer
c/o Hughson Chemicals
Lord Corporation
P.O. Box 556
Saegertown, Pennsylvania 16433

Dear Mr. Full:

This is in answer to your letter of 21 April 81 to Mr. Lynn A. Clark,
of this office. Mr. Clark is no longer with us. ←

To answer your question - Yes, the Norton Construction Company has a
current license to operate a landfill in Cuyahoga County. It is valid
until 31 December 81 at which time it will, no doubt, be renewed for
1982.

It is hoped that this answers your inquiry, if not, please contact me
at (216) 425-9171.

Yours truly,

Jack L. Burgan

Jack L. Burgan, R.S.
District Solid Waste Scientist

JLB:cal

cc: J. Speakman, R.S., OLPC, Central Office
R. Moore, R.S., Cuyahoga County Health Department

AR200605

Lynn A. Clark, P.E.
Section Chief
Office of Land Pollution Control
State of Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

April 21, 1981

Subject: Robert Ross & Sons, Inc. Permit - Landfill of
Incinerator Residues

Reference: Your June 4, 1980 reply to my May 19, 1980 letter
to J.M. Riddell

Dear Mr. Clark:

With your June 4, 1980 letter, I was provided a copy of the Norton
Construction Company permit to operate a landfill. This landfill is
used by Robert Ross & Sons, Inc. to dispose of incinerator residues.

Is this permit still current? Please issue your written reply by
May 11, 1981 if possible.

Thank you for your cooperation.

Sincerely,

J.A. Full
Chemical Buyer

JAF

bcc: J.A. Boughton, FU 5-11-81

AR200606

James M. Riddell, Air Section Chief
State of Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

May 19, 1980

Subject: Your May 13, 1980 reply to my April 2, 1980 letter

Reference: Robert Ross and Sons, Inc., Grafton, OH - Permit to
Operate an Air Contaminant Source

Dear Mr. Riddell:

Thank you for your letter and accompanying copy of the Robert Ross permit.

Please note that I am also interested in documentation of their legal authority to dispose of, by landfill, ash and solid materials generated by their operation. I would also appreciate your statement regarding Ross' expected ability to maintain within the legal requirements of pending RCRA regulations.

Thank you for your assistance.

Sincerely,

J. A. Full
Chemical Buyer

JAF/j

bcc: J. A. Boughton, A05737, Mark Way, FU 6-23

AR200607

Ohio EPA

CC: SAB 12/19/78

Hughson Chemicals, Lord Corporation
P. O. Box 556
Saegerton, Pennsylvania 16433

December 15, 1978


Attention: Jim Full

Dear Mr. Full:

This is to confirm our telephone conversation of December 14, 1978, regarding Robert Ross & Sons, Inc. This facility has been inspected and their permit applications have been reviewed by the Northeast District Office and the Lorain Department of Air Pollution Control. It is our opinion that the incinerator, when operated in conformance with the terms and conditions of their permit will be in compliance with the air pollution control regulations. I have enclosed a copy of the permits and the permit terms and conditions.

I hope this answers your questions. If not, please write or call 216/425-9171.

Sincerely,


David A. Woodring, Chief
Air Pollution Control

DAW:1pa

Enclosure(s)

AR200608



Permit to Operate an Air Contaminant Source

Terms and Conditions

Date of Issuance 03/23/77

Application Number 1947050278 N001

Effective Date 03/23/77

Permit Fee \$110

This document constitutes issuance to: **ROBERT ROSS & SONS, INC.**
394 GILES ROAD
GRAFTON, OHIO 44044

of a permit to operate:

Thermal Oxidizer #7
Liquid Industrial Waste Incinerator

The following terms and conditions are hereby expressly incorporated into this permit to operate:

Condition 1

The above described air contaminant source is now operating, and over the period covered by the permit will be operated, in full compliance with all applicable state and federal laws and regulations.

Condition 2

For any physical change in, or change in the method of operation of, this air contaminant source which increases the amount of any air pollutant emitted, or results in the emission of any air pollutant not previously emitted, a permit to install must be granted by the Ohio Environmental Protection Agency (See ~~Chapter 3745~~ of the regulations).

OAC 3745-31

Condition 3

The Director of the Ohio Environmental Protection Agency, or his authorized representative, may enter upon the premises of the source operation at any reasonable time and subject to safety requirements of the person in control of the premises for the purpose of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants and determining compliance with all applicable State and Federal air pollution laws and regulations and the terms and conditions of this permit.

Condition 4 (This condition applicable if checked:)

Upon declaration of an Air Pollution Alert, Warning or Emergency Episode this air contaminant source will follow those emission reduction procedures enumerated in the Emergency Action Plan approved by the Director for this source.

Condition 5

This permit to operate shall be effective until 03/23/80. You will be contacted approximately four months prior to this date regarding the renewal of this permit. If you are not contacted, please write to this agency.

Condition 6

A permit fee in the amount specified above must be remitted within fifteen (15) days of the effective date of this permit.

Condition 7

The Director must be notified in writing prior to any transfer of a permit to operate. Such transfer shall not take place without the written permission of the Director.

Condition 8 (This condition is applicable if checked:)

permit is subject to the supplementary conditions attached.

AR200609

SPECIAL TERMS AND CONDITIONS

1. Application Number: 1947050278 NG01
2. Facility Name: Robert Ross and Sons, Incorporated
3. Company I. D.: Thermal Oxidizer #7
4. Equipment Description: Liquid Industrial Waste Incinerator
5. Special Terms and Conditions:

I. OPERATING PARAMETERS

A. Temperature Restrictions

- 1) The thermocouple located at the midpoint of the length of the furnace chamber shall be operated and continuously monitored by means of a recording temperature indicator at all times while the thermal oxidizer is in operation. The thermocouple and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturers recommendations, instructions, and operating manuals.
- 2) An additional thermocouple located near the outlet of the furnace chamber shall be maintained in operation while the thermal oxidizer is in operation and shall be connected to a temperature indicator so that the temperature can be periodically read, however, the temperature need not be continuously recorded.
- 3) A spare thermocouple, which in the event of a thermocouple failure, can be used to replace the faulty thermocouple, shall be maintained in inventory.
- 4) The furnace temperature, as indicated by the thermocouple located at the midpoint of the length of the furnace chamber, shall be maintained at a temperature in excess of 1900°F at all times while the thermal oxidizer is in operation except during periods of start up and shutdown. The start up period shall be considered to extend for a period of one hour from the time of flame ignition. The shutdown period shall be considered to extend for a period of ten minutes prior to flame-out.

AR200610

- 5) All temperature data obtained by the recording temperature indicator shall be maintained on file at the facility for a period of at least two (2) years. Such data shall be made available for inspection by any official of the Ohio EPA, Office of Air Pollution Control, or any authorized official of the Lorain Department of Air Pollution Control upon request at any reasonable time.

B. Operation of Scrubber

- 1) The three stage scrubber shall be maintained in full operation at all time while the thermal oxidizer is in operation except as provided by VI.A.1. and except during periods of start up as defined by I.A.4, provided that no chlorinated hydrocarbons are incinerated during the start up period.
- 2) The lime addition to the scrubbing liquor, and other operating parameters of the thermal oxidizer and scrubber system, shall be adjusted and controlled so that the scrubbing liquor at the outlet of the scrubber is maintained at pH 8 or greater at all times while the thermal oxidizer is in operation except for periods of start up or shutdown as specified in paragraph I.A.4. The pH of the scrubbing liquor at the outlet of the scrubber shall be checked at least every two (2) hours with a pH sensitive paper capable of indicating to at least the nearest whole pH value, or other equally accurate device. The pH of the ponds should also be sampled at least twice a day since any large fluctuations in the ponds pH may be indicative of the need for large changes in the rate of lime make-up, or other operating parameters.
- 3) It is recommended that an inventory of spare parts (such as scrubber nozzles, scrubber pumps and valves, pump motors, pump bushings and bearings, pump valve seals and packings, fan bearings, motor to pump couplings or belts, motor to fan couplings or belts) be developed in order to avoid prolonged shutdown of the thermal oxidizer because of scrubber equipment failure. Arrangements may be made with a local supplier to provide such parts within twenty-four (24) hours.

C. Installation and Maintenance of Interlocks

- 1) An interlock device shall be installed and maintained on the relief stack of the thermal oxidizer so that, in the event that the relief stack opens, the induced draft fan, waste feed pump, and combustion air **AR-2006-1-1** . . .

will automatically de-energize so as to shutdown the thermal oxidizer operation. The relief stack will be equipped with an automatic interlock so that the relief stack will open, thereby shutting down operation of the thermal oxidizer, upon loss of scrubbing water supply pressure. These interlocks are to be installed and maintained in accordance with Robert Ross and Sons, Incorporated print number A-R101-20 which was marked and signed by L. A. Davis on January 15, 1975 in behalf of Robert Ross and Sons, Incorporated.

II. WASTE MATERIAL

A. Limitations on Waste Fuel Stock and Water Wastes

- 1) No material which contains insecticide, pesticide, herbicide, or rodenticide nor any material which results from the production of an insecticide, pesticide, herbicide, or rodenticide shall be accepted for disposal at the Giles Road facility.
- 2) No material which is a polychlorinated biphenyl (PCB); nor any water or waste which is contaminated with or which contains any polychlorinated biphenyl; nor any waste which results from the production of any polychlorinated biphenyl shall be accepted for disposal at the Giles Road facility.
- 3) The total ash content of the waste fuel feed stock introduced into the furnace shall at no time exceed 4.2% by weight. The total ash content of the waste water system feed stock introduced into the furnace shall at no time exceed 0.4% by weight.

B. Sampling of Waste Materials

- 1) During each calendar quarter year, Robert Ross and Sons, Incorporated shall, if requested as described below, sample both the liquid waste fuel feed stock, and the contaminated water feed stock, and have such sample analyzed by a competent laboratory to determine the concentrations of i) total ash content ii) total chlorine iii) antimony, Sb iv) arsenic, As v) barium, Ba vi) cadmium, Cd vii) chromium, Cr viii) cobalt, Co ix) lead, Pb x) Mercury, Hg, or such other material, compounds or element as the Agency demonstrates could present a potential hazard to public health or welfare. The results of all such analysis shall be submitted in a timely manner to the

Lorain Department of Air Pollution Control. The sampling shall be conducted in the following manner:

- a) At some random time during reasonable working hours during a normal working day, an official of the Lorain Department of Air Pollution Control will register at the Office of the Robert Ross and Sons, Incorporated facility at Giles Road and request that samples be taken.
- b) The official of the Lorain Department of Air Pollution Control shall be allowed to witness as a sample is taken of both the waste fuel feed stream and the waste water system feed stream. Each of these samples shall contain approximately two quarts. Each of these samples shall then be divided into two (2) representative samples of a homogeneous nature and of approximately one quart each in volume.
- c) One quart (nominal) from each feed stream is to be given to the official of the Lorain Department of Air Pollution Control, and one quart (nominal) from each feed stream is retained by Robert Ross and Sons, Incorporated for laboratory analysis.
- d) Robert Ross and Sons, Incorporated will then select a laboratory to perform the analysis, inform the Lorain Department of Air Pollution Control as to what laboratory has been selected, have the analysis performed, and report the results to the Lorain Department of Air Pollution Control.

III. PERMIT TO INSTALL REQUIREMENTS

A. Permit-to-Install Requirements for Future Modifications [EP-30-01-

- 1) In the event that Robert Ross and Sons, Incorporated should decide to modify the thermal oxidizer, or its operation so as to enable the source to burn any of the materials indicated in paragraph II A, a permit-to-install shall be applied for and obtained prior to modification. Application for a permit-to-install should be submitted to the Lorain Department of Air Pollution Control. Any permit-to-install issued as a result of such application may contain requirements that a performance test be conducted to demonstrate the source's ability to operate effectively under modified conditions. Such application for permit-

AR200613

to-install would be made without prejudice to Robert Ross and Sons, Incorporated, which it is agreed, reserves all legal rights and defenses regarding such application.

IV. COMPLIANCE RESPONSIBILITY

A. Permit Issuance Does Not Relieve Responsibility

- 1) Possession of this permit-to-operate shall not relieve Robert Ross and Sons, Incorporated, of the responsibility to comply with applicable air pollution emission limitations and regulations or with any applicable Federal, State or local laws, rules, regulations, codes, ordinances, or orders.

V. STACK GAS MONITOR

A. Continuous Monitor for Chlorine Emissions

- 1) Within six months from the effective date of this permit, Robert Ross and Sons, Incorporated shall place an order for a continuous stack gas monitor to detect chlorine emissions. Within twelve months from the effective date of this permit, the monitor shall be installed, calibrated, and placed in continuous operation during all times of thermal oxidizer operation.
- 2) The continuous stack gas monitor shall be capable of detecting chlorine concentrations of down to 0.1 ppm (vol), and shall be capable of actuating an alarm should a concentration of 10 ppm (vol) be exceeded.
- 3) The monitor shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, and instructions.
- 4) The operation of the thermal oxidizer and scrubber shall be conducted in such a manner as to minimize chlorine emissions and at no time shall such emissions exceed an in stack concentration of 10 ppm (vol).

VI. REPORT MALFUNCTIONS

A. Abnormal Release of Air Contaminants

AR200614

- 1) Any operation of equipment resulting in abnormal release of air contaminants shall be subject to OEPA regulation AP-2-06(B), unless such release

occurs during a period of normal start up or shut-down. Any abnormal releases should be reported to the Lorain Department of Air Pollution Control. The period of start up or shutdown shall be as defined in paragraph I.A.4.

VII. MAINTAIN RECORDS

A. Log of Materials Received

- 1) A log of materials received for disposal at the Giles Road facility shall be maintained by Robert Ross and Sons, Incorporated. The log shall contain at least the following information:
 - a) Date the material was received.
 - b) Amount of material that was received.
 - c) Name of the company from which material was received.
 - d) Address or location of the plant or facility from which the material was received.
 - e) Identification of the vehicle(s) transporting the material.
 - f) General description of the type of material received.
- 2) The log of material received for disposal at the Giles Road facility shall be kept on file at the facility for a period of at least two (2) years. Such data shall be made available for inspection by any official of the Ohio EPA, Office of Air Pollution Control or any authorized official of the Lorain Department of Air Pollution Control upon request at any reasonable time. The log of materials received for disposal at the Giles Road facility shall be considered to be a confidential record as described in EP-49-03(A).

AR200615

Ohio EPA

Re: Solid Waste
Lorain County
Robert Ross & Sons

cc 6110 Mark Way
JAB (cover letter only)

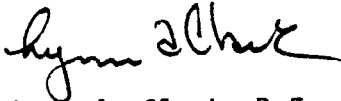
June 4, 1980

Mr. J. A. Full
Chemical Buyer
Highson Chemicals
Lord Corp.
P.O. Box 556
Saegertown, Pennsylvania 16433

Dear Mr. Full:

Currently, Mr. Robert Ross is disposing of his incinerator's residues at the Norton Landfill. A copy of that permit is enclosed. Mr. Ross also has a landfill of his own to which he plans to take those residues when a license has been secured from the Wayne County Health Department. Since a major portion of the hazardous waste regulations were just published May 19, 1980, we have not had an opportunity to review those regulations and speculate on the future compliance of any given facility.

Sincerely,

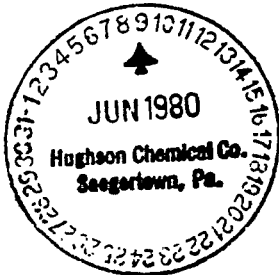


Lynn A. Clark, P.E.
Section Chief
Office of Land Pollution Control
Northeast District Office

LAC:tri

cc: Dan Redman, Ohio EPA - Central Office

Enclosure

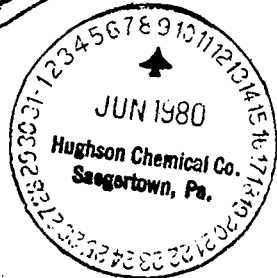


AR200616

OHIO EPA

Re: Cuyahoga County
Broadview Heights
Detail Plans of Expansion of
Royalton Road Landfill
Plans Received June 6, 1979
From Norton Construction Company

ORIGINAL
(Red)



CERTIFIED MAIL

Norton Construction Company
7500 Exchange Street
Valley View, Ohio 44125

Issuance Date: November 28, 1979
Effective Date: November 28, 1979

Gentlemen:

The Ohio Environmental Protection Agency has reviewed the plans and specifications submitted pursuant to Ohio Revised Code Section 3734. These plans and specifications are approved subject to the conditions of compliance with all applicable laws, rules, regulations and standards. Further, all construction must be supervised by an engineer or expert qualified in such work.

This approval shall apply only to those facilities shown on the plans cited above.

The owner shall be responsible for the proper operation and maintenance of the solid waste disposal facilities.

Daily records of operation shall be maintained, and submitted to the Ohio Environmental Protection Agency, if requested.

The local health department having jurisdiction shall be notified prior to start of construction so that construction of this project can be routinely inspected and approved by the local health department before being placed in operation.

Substantial construction for installation must take place within eighteen months of the effective date of this permit. This deadline may be extended by up to twelve months if an application is made to the Director no less than sixty days before the expiration of this permit and the party shows good cause for any such extension.

If leachate is detected on the site or is draining from the site in such quantities that the Director or his authorized representative or the Health Commissioner believes, based on a review of geologic, hydrologic, engineering and other factors, that a threat of water pollution exists, the leachate shall be contained on the site and properly treated or shall be collected and transported from the site for proper treatment.

certify that to be a true and accurate copy of the official documents filed in the records of the Ohio Environmental Protection Agency.

By: *Carol Tronobell* Date 11/28/79

Ohio Environmental Protection Agency
CERTIFIED DIRECTOR'S JOURNAL

NOV 28 1979

APR 20 06 17

ORIGINAL
(REB)

Norton Construction Company
November 28, 1979
Page Two

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All necessary action shall be taken to minimize, control or eliminate the conditions which contribute to the production of leachate.

The extent of the landfill and it's property lines should be clearly marked on the site in a responsibly secure manner.

A topographical survey shall be performed by the permit holder at the request of either the Health Commissioner or a representative of the Ohio EPA.

On completion of the construction, a certificate by the Engineer supervising the construction, stating that the facilities have been constructed in conformity with the approved plans, should be filed with the Northeast District Office of the Ohio EPA no later than thirty (30) days following the completion of construction.

Analysis of the waste stream, adjacent surface or groundwaters, noise, air borne pollutants or any other such testing that the Health Commissioner or a representative of the Director feels necessary to determine the impact of this facility upon the environment, shall be made by the permit holder.

No sludges, liquids, or hazardous wastes other than the ones listed below may be accepted for disposal without written approval of the Agency. All such wastes shall be handled only in the manner prescribed by the Agency. If problems arise resulting from the acceptance of such wastes, action shall be taken by the permit holder in accordance with this Agency's requests.

- (a) Robert Ross and Sons, incinerator ash.
- (b) Robert Ross and Sons, scrubber lagoon sludges.
- (c) B. F. Goodrich latex from Avon Lake, Ohio; 30 to 80 percent solids content.
- (d) B. F. Goodrich curite 18 drum ash. AR200618
- (e) Luria Brothers shredded auto body residue.
- (f) Chevrolet, Parma Plant SO₂ scrubber sludge, 50% moisture content, no more than 30 CY/DAY.

This document is to be filed in the records of the Ohio Environmental Protection Agency.

By: Paul Manske Date 11/28/79

Norton Construction Company
November 28, 1979
Page Three

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- (g) Chevrolet, Parma Plant grinder waste sludge, 60% iron compounds, 25% water, 2% oil remainder carbon from grinding wheel, no more than 10 CY/DAY.
- (h) Day Glo's melanine, toluene sulfonamide and solid formaldehyde, approximately 200 lbs/week.
- (i) DuPont's, CD and PD Cleveland Plant, filter muds and WWTP sludges, 30% minimum solids, no more than 40 CY/DAY.

The leachate and gas collection and disposal system shall be operated and maintained as long as those by-products are being produced after the landfill closes.

The proposed facility may be constructed and operated only in accordance with plans approved by the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviation from the approved plans or the above conditions may lead to denial of an operating license or other sanctions and penalties provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

Should there be any questions regarding the requirements, meaning or interpretations of any of the above which we may clarify, please contact the appropriate District Office of the Ohio Environmental Protection Agency.

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

I certify this to be a true and accurate copy of the
official record of the Director of the Ohio
Environmental Protection Agency.

By: Carol Marchant Date 11/28/79

AR200619

Norton Construction Company
November 28, 1979

Page Four
(Red)

appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division 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
Suite 305
395 East Broad Street
Columbus, Ohio 43215

Very truly yours,

James F. McAvey
Director

JFM/pam

cc: Bowser-Morner Testing Labs
cc: Cuyahoga County Health Dept.
cc: Mayor Edna Deffler, City of Broadview Heights
cc: Northeast District Office

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

NOV 28 1979

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: Carol Marshall Date 11/28/79

AR200620

21.
C/la-71

Re: Cuyahoga County
Broadview Heights
Application For Expansion of Existing
Sanitary Landfill
Received June 6, 1979
From Mr. Joseph Balog

CERTIFIED MAIL

Norton Construction Company
7500 Exchange Street
Valley View, Ohio 44125

November 28, 1979

Gentlemen:

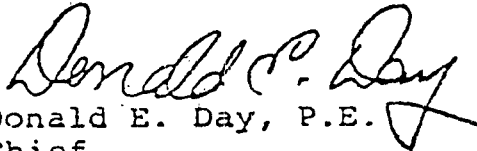
Enclosed is the Ohio EPA Permit to Install which will allow you to install the described source in the manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days 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 Law Division 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
Suite 305
395 East Broad Street
Columbus, Ohio 43215

If you have any questions, please contact the Ohio EPA District Office or local air pollution control agency to whom you submitted your application.

Yours truly,



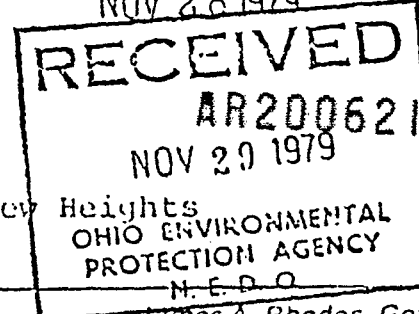
Donald E. Day, P.E.
Chief
Office of Land Pollution Control

DED/pam

cc: Bowser-Morner Testing Labs
cc: Cuyahoga County Health Dept.
cc: Mayor Edna Deffler, City of Broadview Heights
cc: Northeast District Office

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

NOV 28 1979



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.

11/28/79

NOV 29 1979

OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Application No. 02-585

Applicants Name: Norton Construction
Company
Address: 7500 Exchange Street

Permit Fee: \$ None

City: Valley View

State: Ohio 44125

Telephone: (216) 447-0070

Description of Proposed Source: Expansion of existing sanitary
landfill

Issuance Date: November 28, 1979

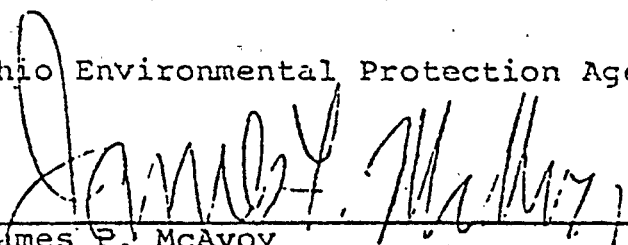
Effective Date: November 28, 1979

The above named entity is hereby granted a permit to install for the above described source pursuant to Chapter 3745-31 of the Ohio Administrative Code (former Ohio EPA Regulation EP-30). Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source of pollutants will be granted the necessary operating permits. This permit is granted subject to the following conditions attached hereto:

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

NOV 28 1979

Ohio Environmental Protection Agency

by 
James P. McAvoy
Director
361 East Broad Street
Columbus, Ohio 43215

AR200622

Case No. Date 11/28/79

Norton Construction Company
November 28, 1979
Page Two

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Substantial construction for installation must take place within eighteen months of the effective date of this permit. This deadline may be extended by up to twelve months, if application is made to the Director no less than sixty days before the expiration of this permit and the party shows good cause for any such extension.

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, examining records or reports pertaining to the construction, modification or installation of the above described source of environmental pollutants.

The proposed source shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

Daily records of operation shall be maintained and submitted to the Ohio Environmental Protection Agency at the end of each month.

The local health department having jurisdiction shall be notified prior to start of construction in order that construction of this source can be routinely inspected and approved by the local health department before being placed into operation.

The owner shall provide for the proper maintenance and operation of the solid waste disposal site or source in accordance with the provisions of Rule 3745-27 of the Ohio Administrative Code.

Monitor wells shall be installed by the owner or operator if requested by the Ohio Environmental Protection Agency. Locations, depths, and characteristics of such wells shall be as required by the Ohio Environmental Protection Agency.

AR200623

I hereby certify that this is a true and correct copy of the original as it appears in the records of the Ohio Environmental Protection Agency.

By: Carol Marshall Date 11/28/79

Norton Construction Company
November 28, 1979
Page Three

NOV 28 1979

If leachate is detected on the site or is draining from the site in such quantities that the Director or his authorized representative or the Health Commissioner believes, based on a review of geologic, hydrologic, engineering and other factors, that a threat of water pollution exists, the leachate shall be contained on the site and properly treated or shall be collected and transported from the site for proper treatment. All necessary action shall be taken to minimize, control or eliminate the conditions which contribute to the production of leachate.

The extent of the landfill and its property lines should be clearly marked on the site in a responsibly secure manner.

A topographical survey shall be performed by the permit holder at the request of either the Health Commissioner or a representative of the Ohio EPA.

On completion of the construction, a certificate by the Engineer supervising the construction, stating that the facilities have been constructed in conformity with the approved plans, should be filed with the Northeast District Office of the Ohio EPA no later than thirty (30) days following the completion of construction.

Analysis of the waste stream, adjacent surface or groundwaters, noise, air borne pollutants or any other such testing that the Health Commissioner or a representative of the Director feels necessary to determine the impact of this facility upon the environment, shall be made by the permit holder.

No sludges, liquids or hazardous wastes other than the ones listed below may be accepted for disposal without written approval of the Agency. All such wastes shall be handled only in the manner prescribed by the Agency. If problems arise resulting from the acceptance of such wastes, action shall be taken by the permit holder in accordance with this Agency's requests.

- (a) Robert Ross and Sons, incinerator ash.
- (b) Robert Ross and Sons, scrubber lagoon sludges.
- (c) B. F. Goodrich latex from Avon Lake, Ohio; 30 to 80 percent solids content.
- (d) B. F. Goodrich curite 18 drum ash.
- (e) Luria Brothers shredded auto body residue.

AR200624

- (f) Chevrolet, Parma Plant SO₂ scrubber sludge, 50% moisture content, no more than 30 CY/DAY.
- (g) Chevrolet, Parma Plant grinder waste sludge, 60% iron compounds, 25% water, 2% oil remainder carbon from grinding wheel, no more than 10 CY/DAY.
- (h) Day Glo's melanine, toluene sulfonamide and solid formaldehyde, approximately 200 lbs/week.
- (i) DuPont's, CD and PD Cleveland Plant, filter muds and WWTP sludges, 30% minimum solids, no more than 40 CY/DAY.

The leachate and gas collection and disposal systems shall be operated and maintained as long as those by-products are being produced after the landfill closes.

Should there be any questions regarding the requirements, meaning or interpretations of any of the conditions of this permit, please contact the Office of Land Pollution Control, Northeast District Office of the Ohio EPA.

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

NOV 28 1979

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: Carol Marshall Date 11/28/79

AR200625

Brown, Makee, Strangward and Ward
79 DEC 31 13:15
Counsellors at Law

Area Code 216
241-1204

OFFICE OF THE DIRECTOR
OHIO EPA
922 Leader Building
Cleveland, Ohio 44114

of Counsel
Robert S. Malaga

December 28, 1979

James F. McAvoy, Director
State of Ohio Environmental
Protection Agency
Box 1049, 361 East Broad Street
Columbus, Ohio 43216

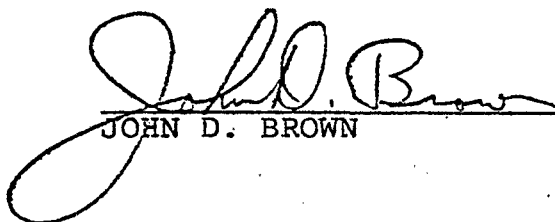
RE: Residents Organized to Preserve the Environment
vs. James F. McAvoy, Director, Et Al

Dear Mr. McAvoy:

Enclosed please find a photocopy of our Notice of Appeal
which I have this 28th day of December, 1979 filed with
the Environmental Board of Review.

Thank you.

Sincerely yours,



JOHN D. BROWN

JDB:mf
Enclosure

RECEIVED
JAN 13 1980
OHIO ENVIRONMENTAL
PROTECTION AGENCY
C. D. O.
AR200626

Recd.

Brown, Malaga, Pstrangward and Ward

79 DEC 31 P 3:15

Counsellors at Law

OFFICE OF COUNSEL 922 Leader Building

Cleveland, Ohio 44114

*of Counsel
Robert P. Malaga*

*Area Code 216
241-1204*

December 28, 1979

James F. McAvoy, Director
State of Ohio Environmental
Protection Agency
Box 1049, 361 East Broad Street
Columbus, Ohio 43216

RE: Residents Organized to Preserve the Environment
vs. James F. McAvoy, Director, Et Al

Dear Mr. McAvoy:

Enclosed please find a photocopy of our Notice of Appeal
which I have this 28th day of December, 1979 filed with
the Environmental Board of Review.

Thank you.

Sincerely yours,



JOHN D. BROWN

JDB:mf
Enclosure

AR200627

**James M. Riddell, Air Section Chief
State of Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087**

May 19, 1980

Subject: Your May 13, 1980 reply to my April 2, 1980 letter

**Reference: Robert Ross and Sons, Inc., Grafton, OH - Permit to
Operate an Air Contaminant Source**

Dear Mr. Riddell:

Thank you for your letter and accompanying copy of the Robert Ross permit.

Please note that I am also interested in documentation of their legal authority to dispose of, by landfill, ash and solid materials generated by their operation. I would also appreciate your statement regarding Ross' expected ability to maintain within the legal requirements of pending RCRA regulations.

Thank you for your assistance.

Sincerely,

**J.A. Full
Chemical Buyer**

JAF /j

bcc: J.A. Boughton, A05737, Mark Way, FU 6-23

AR200628

OhioEPA

Mr. J. A. Full
Chemical Buyer
Hughson Chemicals
Lord Corporation
P.O. Box 556
Saegertown, Pennsylvania 16433

June 3, 1980

Dear Mr. Full:

In answer to your letter of May 19, 1980, I have referred your question to Mr. Lynn Clark, Office of Land Pollution Control, Northeast District Office.

Mr. Clark will be able to answer your question on Ross' expected ability to maintain within the legal requirements of pending RCRA regulations.

Sincerely,

Jim Riddell
(cc)

Jim Riddell
Air Section Chief
Northeast District Office

JR:c11

cc: Mr. Lynn Clark



AR200629