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PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CARBOLINE COMPANY
XENIA, OHIO
OHD 030 963 615

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 030 963 615
Date Prepared	:	November 6, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH2F
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4. F-Waste Storage Tank
5. Kettle Cleaning Area
6. Back Pad

Areas of Concern

1. Solvent Blending Tank Area
2. National Pollutant Discharge Elimination System (NPDES) Outfall

PRC believes the potential for releases from Carboline to ground water is high. Releases to on-site soils from the solvent blending tanks (AOC 1) have occurred. During the VSI, stained soils were observed in the vicinity of the Hazardous Waste Storage Area (SWMU 2), the D-Waste Storage Tank (SWMU 3), and the Back Pad (SWMU 6). Bedrock at the facility is about 20 feet below ground surface and underlies gravel deposits. Area well logs indicate that the water table is present at about 25 feet; however, PRC believes that the lower portion of the gravel deposits are saturated during and after heavy rains. In the Xenia area, ground water is used as a primary industrial and municipal water source. The city of Xenia water department pumps between 3 and 4 million gallons of ground water per day from well fields about 2.8 miles northeast and upgradient of the facility. At the south end of the Carboline facility, there is one production well that is used for noncontact cooling water. The facility receives all its drinking water from the city of Xenia.

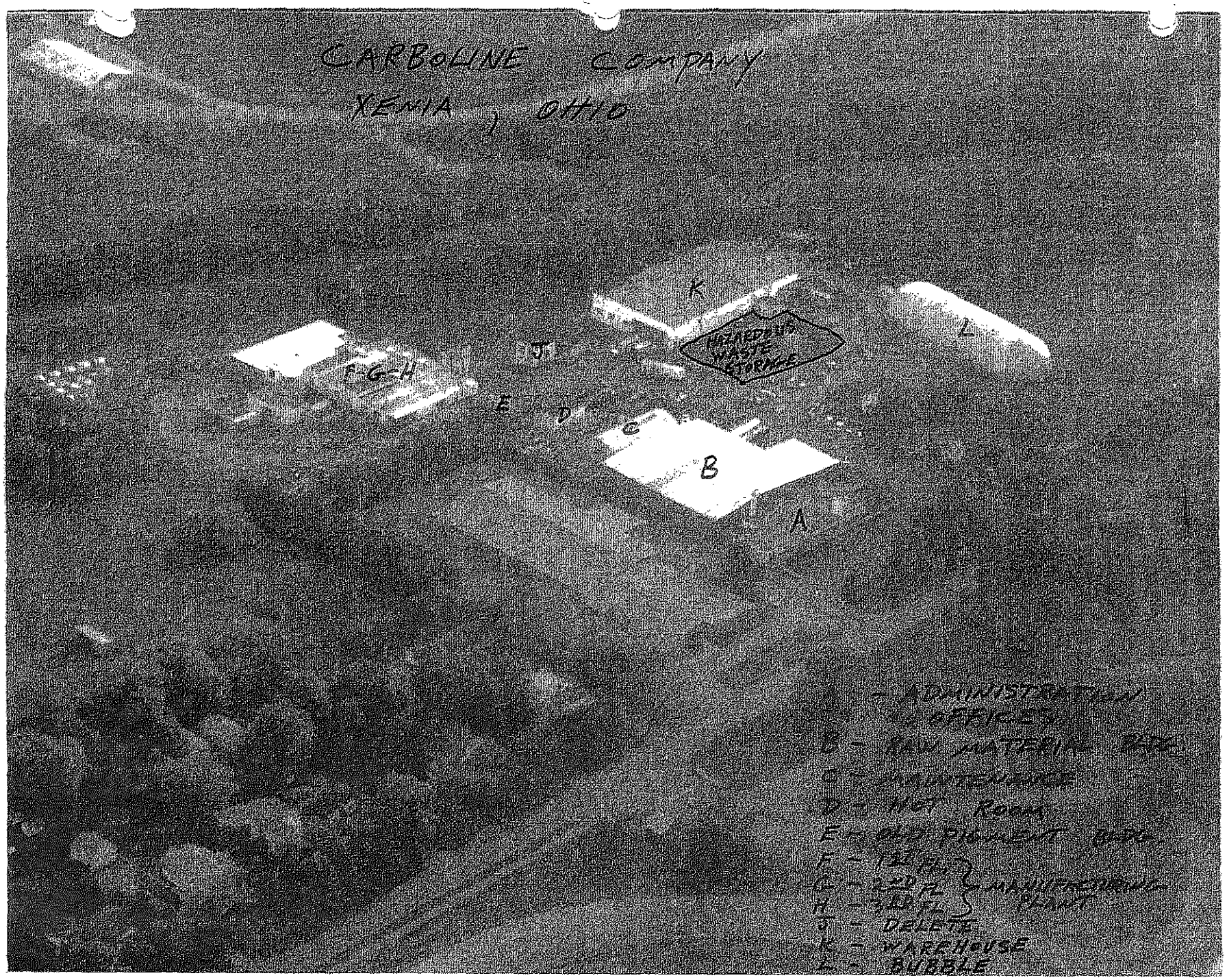
The facility has a moderate potential for release to surface water. Along the south border of the Carboline facility, there is an outfall that releases to the nearest surface water body, Shawnee Creek. Carboline does not possess a current NPDES permit for the outfall. Releases of hazardous constituents from the outfall to Shawnee Creek have occurred in the past.

Carboline has a moderate potential for release of hazardous constituents to air because of the high volatility of the solvents used at the facility. Carboline has one air permit covering a baghouse (SWMU 1). No complaints from residents of the area have been recorded.

PRC believes that further study of possible contamination and hydrogeologic conditions at the Carboline facility is needed. To accomplish this, PRC recommends that soil borings to bedrock with continuous split-spoon sampling be performed at the Carboline facility to define hydrogeologic conditions and to determine the presence of contamination. Investigative efforts

should focus on SWMU 2, SWMU 3, SWMU 6, and AOC 1. Because of the large number of different materials used at the facility over the years, soil samples should be analyzed for all hazardous waste constituents. The closure status of SWMU 3 should also be further investigated.

The NPDES outfall area also should be assessed. Sediment samples should be collected from Shawnee Creek near the NPDES Outfall (AOC 2) to determine the presence and extent of contamination. Samples should be analyzed for all hazardous waste constituents.



1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) programs are working together to identify and address RCRA facilities that have a high priority for corrective action under applicable RCRA and CERCLA authorities. The PA/VSI is the first step in prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where there is a strong possibility that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Carboline Company (Carboline) facility (EPA Identification No. OHD 030 963 615) in Xenia, Greene County, Ohio. The PA was completed on May 5, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) Southwest District files and from EPA Region 5 RCRA files. The VSI was conducted on May 7, 1992. It included interviews with a facility representative and a walk-through inspection of the facility. PRC identified six SWMUs and two AOCs at the facility.

PRC completed EPA Form 2070-12, using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and 12 inspection photographs are in Attachment B. Field notes from the VSI are included as Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations, waste generating processes and waste management practices, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Carboline facility is located at 125 Fairgrounds Road in Xenia, Greene County, Ohio (latitude 39°41'53"N, longitude 83°56'27"W), as shown in Figure 1. The Carboline facility is bordered on the north by the county fairgrounds and a residential area, on the west by a residential area, on the south by Shawnee Creek, and on the east by a school for the handicapped and other small businesses.

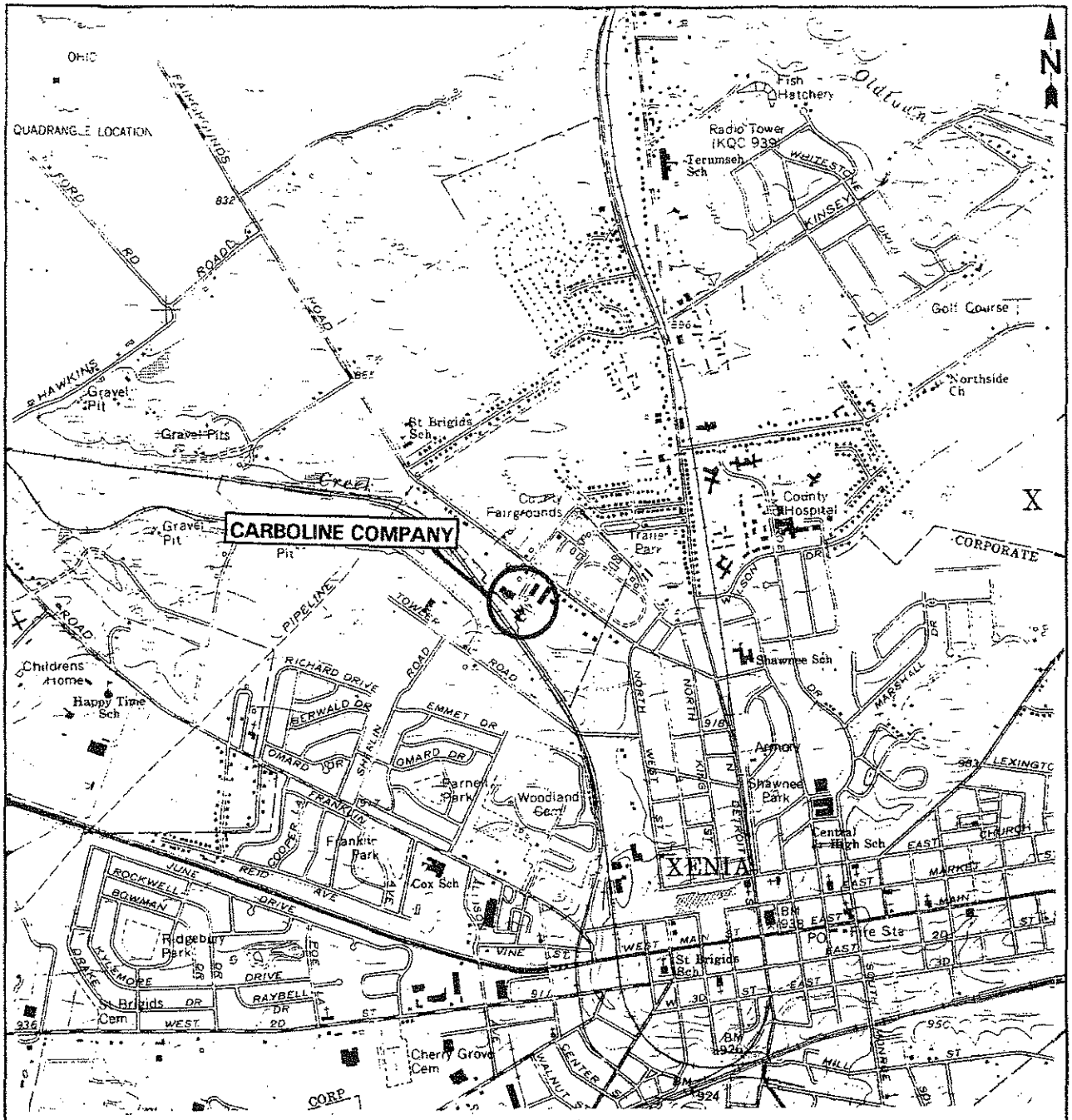
2.2 FACILITY OPERATIONS

The Carboline facility covers about 12 acres. The facility consists of 4 separate buildings: a raw materials and product storage warehouse, a three-story manufacturing plant, a dry pigment warehouse, and an office building (see Figure 2).

The facility opened in 1953 as the Moran Paint Company of Xenia, Ohio (Moran). Under the ownership of Moran, paint finishes for the automotive and appliance industries were manufactured at the facility. The facility was purchased by Carboline in about 1962 and continued manufacturing products under the Moran name. The Moran product line was sold in 1982, however manufacturing operations remained the same. Carboline employs about 55 to 60 people at the Xenia facility and operates on first and third work shifts.

Carboline is a paint manufacturing company, specializing in epoxy coatings. Epoxy coatings are used in various industries as corrosion inhibitors for metallic surfaces. Carboline blends various grades of liquid and solid paint materials and solvents to match the specifications of a particular order. About 700 virgin chemicals are stored on-site in 55-gallon drums and 1-cubic yard bulk packages for use in production.

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2.

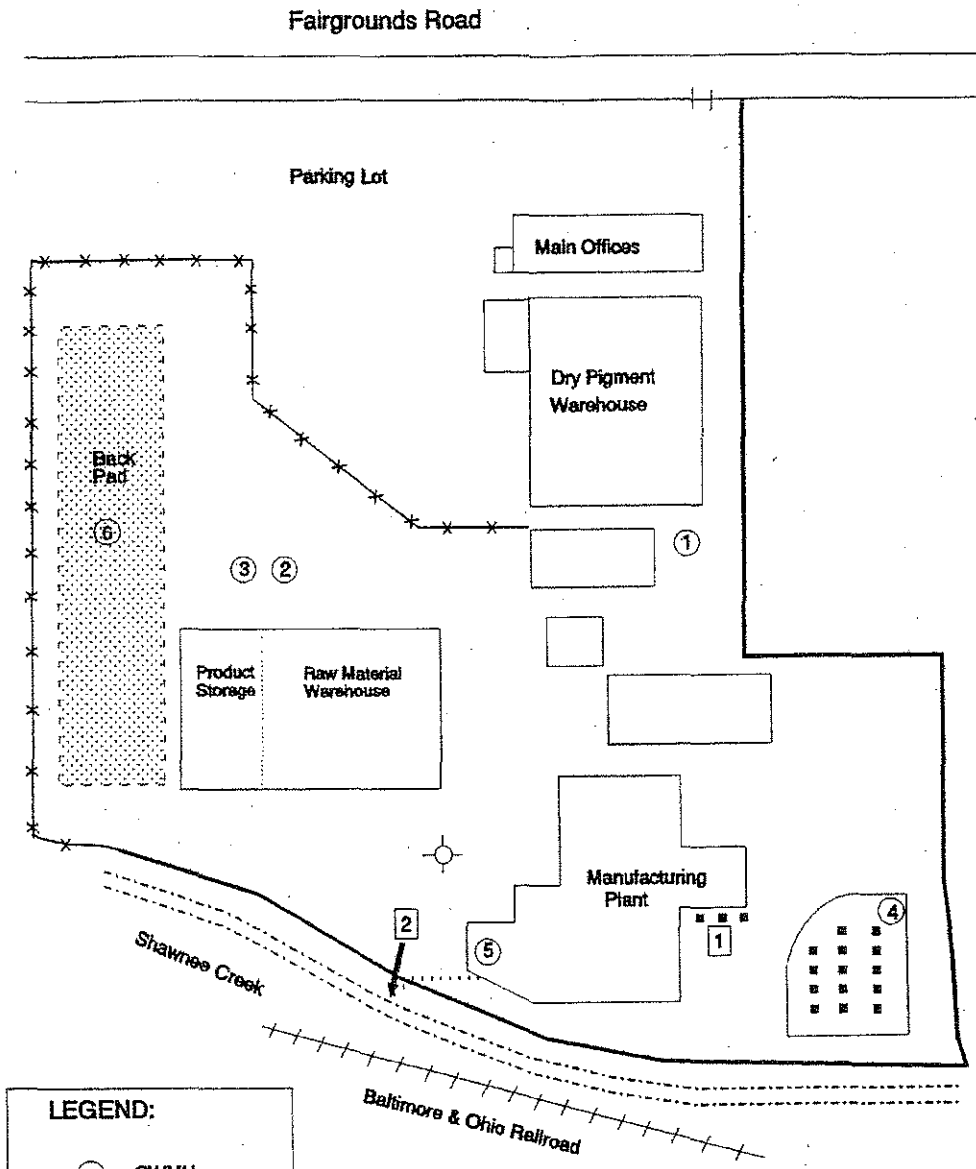


CARBOLINE COMPANY
XENIA, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

Source: Modified From USGS, Xenia Quadrangle, Photorevised 1987.



Solid Waste Management Units

1. Baghouse
2. Hazardous Waste Storage Area
3. D-Waste Storage Tank
4. F-Waste Storage Tank
5. Kettle Cleaning Area
6. Back Pad

Areas of Concern

1. Solvent Blending Tanks
2. NPDES Outfall

35' 0' 35' 70'

SCALE: 1" = 70'

SOURCE: Modified from Carboline Company, 1992

CARBOLINE COMPANY
XENIA, OHIO

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Baghouse	No	Active
2	Hazardous Waste Storage Area	Yes	Active, closed in 1984 to achieve generator status
3	D-Waste Storage Tank	Yes	Active; the unit has apparently not been closed
4	F-Waste Storage Tank	No	Active
5	Kettle Cleaning Area	No	Active
6	Back Pad	Yes	Active

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

2.3 WASTE GENERATION AND MANAGEMENT

Wastes generated at the Carboline facility include waste paint thinners, waste paint materials, and miscellaneous dust (see Table 2) (Carboline, 1991). While preparing this PA/VSI report, PRC received conflicting information from the facility representative concerning waste management practices at Carboline.

Carboline generates waste halogenated (F001) and nonhalogenated (F003 and F005) paint thinners in the Kettle Cleaning Area (SWMU 4). Paint thinners are used to loosen solidified paint waste from the kettles used in manufacturing. The loosened waste paint is allowed to settle in the mixing tanks and the thinner is decanted from the surface for reuse.

As the thinners become spent, the materials are placed in 55-gallon drums in the Kettle Cleaning Area; halogenated and nonhalogenated thinners are stored in separate drums. When the drums are full, Carboline transfers those containing halogenated materials to the Hazardous Waste Storage Area (SWMU 2). Because Carboline generates a larger amount of nonhalogenated waste solvents, those materials are transferred to the F-Waste Storage Tank (SWMU 4) (Carboline, 1992a). All of the waste paint thinners eventually are removed from the facility by Ecolotec, Inc. of Dayton, Ohio for used in fuels blending. Carboline generates about 180 tons of waste paint thinners per year (Carboline, 1991).

The loosened waste paint material (F003, F005, D001, D005, D007, and D008) that settles in the mixing tanks is placed in 55-gallon drums in the Kettle Cleaning Area. When full, the drums are transferred to the Hazardous Waste Storage Area (SWMU 2) and eventually removed from the facility by Ecolotec for incineration.

Carboline stores off-specification paint in steel drums of various sizes in an area called the Back Pad (SWMU 6). When the Back Pad is nearing its capacity or when paint is no longer usable, portions of the materials are placed in the Hazardous Waste Storage Area as waste paint materials (F003, F005, D001, D005, D007, and D008). Solid materials are left in drums, while D-waste liquid materials are pumped to a D-Waste Storage Tank (SWMU 3). The waste materials are removed from the facility by Ecolotec, for use in either fuels blending or for incineration, depending on the viscosity of the materials. Carboline generates about 95 tons of waste paint materials per year (Carboline, 1991).

Handling of bags of dry pigment in a dry pigment warehouse generates miscellaneous dust containing chromium (D007) and lead (D008). Carboline uses a Baghouse (SWMU 1) to continually collect the dust from the warehouse. The dust is collected in 55-gallon drum located

TABLE 2
SOLID WASTES

Waste/EPA Waste Code	Source	Solid Waste Management Unit
Waste paint thinners/F001, F003, and F005	Kettle cleaning	2, 3 and 4
Waste paint materials/F003, F005, D001, D005, D007, and D008	Kettle cleaning and off-spec materials	2, 3, 5, and 6
Miscellaneous dust: chromium/(D007), lead/(D008)	Dry pigment warehouse	1 and 2

underneath the Baghouse. Carboline uses the dust as filler to top off drums of waste paint materials stored in SWMU 2.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the Carboline facility.

In July 1985, a chemical spill occurred at Carboline during the unloading of a tanker truck near a tank farm in the southeastern corner of the facility. More than 260 gallons of epoxy resin hardener were released from the tanker. Carboline attempted to pump the hardener back into the tanker; however an undetermined amount was released to the surrounding soil. Carboline notified EPA of the spill several days later. An OEPA representative inspected the spill area, but gave Carboline no formal report (Carboline, 1985). Carboline had the contaminated soil excavated and taken to Adams Center Industrial Landfill in Allen County, Indiana (Indiana, 1985). There is no documentation of any regulatory action against Carboline concerning the release.

During the VSI, the facility representative stated that two spills occurred from the solvent blending tanks, located at the rear of the main production building. One spill occurred in August 1991 during the filling of a methanol tank. About 20 gallons of methanol were released to Shawnee Creek through storm drains that discharge at Carboline's National Pollutant Discharge Elimination System (NPDES) Outfall (AOC 3). Shawnee Creek borders Carboline to the southwest.

In March 1992, more than 800 gallons of a mixture of methyl ethyl ketone and toluene were released from a solvent blending tank. Carboline was able to recover about half the released material. The rest entered Shawnee Creek through storm drains and AOC 3.

The facility representative stated that each of the releases killed many fish in Shawnee Creek. There is no documentation in EPA Region 5 or OEPA files of any action against Carboline for either release. During the VSI, the facility representative stated that Carboline is planning to perform an investigation of the spill areas; the investigation will include a series of soil borings and sample analyses. However, OEPA is not aware of planned investigation activities, and no regulatory action is pending against Carboline.

2.5 REGULATORY HISTORY

In July 1981, Carboline filed a RCRA Part A permit application with OEPA. The application identified Carboline as a treatment, storage, or disposal (TSD) facility storing wastes in a tank (SWMU 3) and in drums (SWMU 2) (Carboline, 1981). The permit application listed the following hazardous waste codes: K078, K079, K081, F002, F003, and F005. No documentation is available regarding submittal of a Notification of Hazardous Waste Activity form.

In December 1982, Carboline notified OEPA that the Hazardous Waste Storage Area (SWMU 2) had been closed. Carboline stated that accumulated waste paint had been removed from the facility and requested that the facility's Part A permit application be withdrawn (Carboline, 1982a). OEPA immediately informed EPA of the closure, and EPA requested details of the closure from Carboline. In a December 1982 letter to EPA, Carboline explained the closure and supplied certification from a professional engineer that proper closure had been accomplished (Carboline, 1982b). According to the facility representative, Carboline currently is using SWMU 2 to store hazardous waste for less than 90 days. It should be noted that the D-Waste Storage Tank (SWMU 3) was listed on the Part A permit application and has apparently not been closed.

In September 1984, EPA granted Carboline a change in status from that of a TSD facility to that of a hazardous waste generator that stores waste for less than 90 days (EPA, 1984). OEPA acknowledged the change in status in April 1985 (OEPA, 1985).

OEPA conducted RCRA interim status inspections at the facility during the early to mid-1980s. Most violations involved information missing from Carboline's personnel training program and contingency plan (OEPA, 1982 through 1984). There is no documentation in the file indicating that Carboline addressed the violations.

As reported in Section 2.4, several chemical spills have occurred at the Carboline facility. Soil has been excavated from one of the spill areas, and Carboline is planning a soil investigation. EPA Region 5 and OEPA have had little regulatory involvement at the facility since Carboline was granted generator status in 1984, and are not involved in the planned investigative work.

Carboline does not possess a current NPDES permit; however, the facility has an NPDES outfall to Shawnee Creek. The facility representative stated that Carboline's last NPDES permit expired in 1986. When the permit expired, OEPA told Carboline to follow the requirements of the expired permit (Carboline, 1992b). The permit requires Carboline to monitor monthly for suspended solids, oil, grease, and pH. The facility representative stated that he has contacted

OEPA repeatedly concerning this matter; however, the agency has not acted. OEPA has no record of Carboline filing NPDES permit applications since the permit expired in 1986, and no monitoring records are available. As detailed in Section 2.4, unpermitted releases have occurred to Shawnee Creek via the NPDES Outfall (AOC 2).

Carboline has one air permit that involves collection of dust at the Baghouse (SWMU 1). No complaints from residents in the area have been recorded. There has been no Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Greene County is characterized by warm, humid summers and cold, cloudy winters. The yearly average temperature is 54°F. The lowest monthly average temperature is 23°F in January, and the highest monthly average temperature is 87°F in July. Precipitation in southwestern Ohio is fairly well distributed throughout the year. The average yearly rainfall in Greene County is 37.46 inches. Monthly rainfall peaks in June at 4.04 inches; the lowest monthly rainfall, 2.19 inches, occurs in October (USDA, 1978). The 1-year, 24-hour maximum rainfall is 2.5 inches, and annual net precipitation is 7.0 inches. The prevailing wind is from the southwest and averages 7 miles per hour in summer and 11 miles per hour in winter (Todd, 1983).

2.6.2 Flood Plain and Surface Water

The Carboline facility lies partially in a 100-year flood plain of Shawnee Creek (National Flood Insurance Program, 1981). Shawnee Creek borders the Carboline facility on the southwest. The creek flows northwest and enters the Little Miami River about 1.5 miles northwest. The Little Miami River eventually enters the Ohio River about 80 miles south. Annual flooding occurs along the south portion of the facility in low-lying areas, despite a dike constructed along Shawnee Creek.

Surface water at the facility drains to stormwater drains that empty to Shawnee Creek via Carboline's NPDES outfall.

2.6.3 Geology and Soils

Greene County lies on the east flank of the Cincinnati Arch, a large anticline running from Tennessee to Canada. The bedrock in the area is of Ordovician age and consists of interbedded shale and limestone of the Cincinnati series (Ausich, 1981). Bedrock in the Carboline area is about 20 feet below the ground surface; it dips northwest toward the Little Miami River. During the Pleistocene Epoch, the advance and retreat of Wisconsinan glaciers deposited most of the unconsolidated materials that overlie bedrock in the area (USDA, 1978). Upon the retreat of the glaciers, meltwater from glacier ice cut channels through the glacial deposits, creating the drainage pattern that exists today.

A well log from about 500 feet northwest of Carboline's property lists the following units in descending order (Ohio Department of Natural Resources [ODNR], 1992):

- 0 to 4 feet: soil and fill material
- 4 to 20 feet: gravel with thin clay lenses
- 20 to 25 feet: shale bedrock
- 25 to 65 feet: limestone bedrock

Soils at the facility are of the Ockley-Urban Land complex. This soil class consists of nearly level and gently sloping soils on stream terraces (USDA, 1978).

2.6.4 Ground Water

Because little information is available concerning local ground water, hydrogeologic conditions at Carboline are difficult to assess. Depth to ground water in the area is about 25 feet; however, because of the low permeability of the shale formation directly beneath the facility, PRC believes that the lower portion of the gravel and clay deposit is saturated during and after periods of heavy rainfall. Glacial deposits, mainly sand and gravel in ancient river channels, are the highest-yielding aquifers in Greene County. These aquifers are capable of yielding more than 500 gallons per minute (Todd, 1983). Bedrock in the area is a poor source of ground water, capable only of low yields. Regional ground-water flow is generally south to southwest. Shallow ground-water flow, if and when ground water is present in the gravel deposits beneath the facility, is probably southwest toward Shawnee Creek. Ground water is recharged by flow from the north and by surface infiltration (ODNR, 1956).

2.7 RECEPTORS

The Carboline facility occupies about 12 acres in a mixed residential and industrial area in Xenia, Ohio. Xenia has a population of about 24,836; about 950 private residences lie within one mile of the facility. From 55 to 60 people work at the facility.

The facility is bordered on the north by County Fairgrounds and a residential area, on the west by a residential area, on the southwest by Shawnee Creek, and on the east by Saint Brigid's School and by other businesses. The facility is equipped with an alarm system and is surrounded by a chain-link fence. The nearest hospital is Greene County Hospital, about 4,000 feet northeast.

The nearest surface water body, Shawnee Creek, is located along the southwest border of the facility. Shawnee Creek is used for recreational fishing and receives stormwater discharges. Carboline's NPDES outfall discharges to the creek. The creek flows northwest and enters the Little Miami River about 1.5 miles northwest of the facility. The Little Miami River enters the Ohio River about 80 miles south. There are no drinking-water intakes on the Little Miami River near or south of Xenia.

Ground water is used in the Xenia area as a primary source of both industrial and municipal water. The City of Xenia obtains drinking water from two well fields located about 2.8 miles northeast and upgradient from the facility, near the junction of the Little Miami River and Massies Creek. The Xenia water department pumps from 3 to 4 million gallons of ground water per day from wells screened at depths from 50 to 120 feet below ground surface in a valley-train gravel aquifer (Xenia, 1992). The wells are upgradient from the Carboline facility. At the south end of the Carboline facility there is one production well that is used for noncontact cooling water. The facility representative could not provide information on the depth at which the well is screened. Carboline receives all its drinking water from the city of Xenia.

There are no wetlands or sensitive environments within 2 miles of the facility (USGS, 1987).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the six SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1	**Baghouse**
Unit Description:	The Baghouse is located outdoors just southwest of the dry pigment warehouse. The unit is aboveground and is totally enclosed. It is constructed of steel and sits on a 12- by 12-foot unsealed concrete base (see Photograph No. 1). The unit collects fugitive dust from the dry pigment warehouse and accumulates the dust in a 55-gallon drum underneath the unit. A chute connects the Baghouse and drum, fully enclosing the unit. The dust is used as filler to top off drums in the Hazardous Waste Storage Area (SWMU 2).
Date of Startup:	The unit was installed in the early 1980s.
Date of Closure:	The unit is active.
Wastes Managed:	The unit collects fugitive dust from the dry pigment warehouse and accumulates the dust in a 55-gallon drum underneath the unit. The dust contains chromium (D007) and lead (D008).
Release Controls:	The fully enclosed unit sits on an unsealed concrete base.
History of Documented Releases:	No releases have been documented from the unit.
Observations:	During the VSI, the unit was in sound condition and displayed no signs of deterioration. PRC noted no evidence of release.
SWMU 2	**Hazardous Waste Storage Area**
Unit Description:	The Hazardous Waste Storage Area is located in the northwestern section of the facility. According to the facility representative, it

	is currently used to store hazardous waste for less than 90 days. The unit measures about 40 by 40 feet and is composed of an uncovered gravel pad of undefined dimensions. There is no berm surrounding the area and no secondary containment (see Photograph No. 2). Fifty-five-gallon drums are stored in the area, most of them on pallets (see Photograph No. 3).
Date of Startup:	The unit has been used since 1980.
Date of Closure:	The unit is active. However, Carboline closed the unit in late 1982, and the closure was certified by a professional engineer. In 1984 and 1985, EPA and OEPA respectively acknowledged change in the facility's status from that of a TSD facility to that of a generator with storage of wastes for less than 90 days.
Wastes Managed:	The unit is used for drum-storage of waste paint materials (F003, F005, D001, D005, D007, and D008) and halogenated waste paint thinners (F001, F003, and F005) for less than 90 days. The unit also stores miscellaneous dust (D007 and D008) accumulated in the baghouse (SWMU 1).
Release Controls:	The unit has no secondary containment.
History of Documented Releases:	No releases from the unit have been documented.
Observations:	During the VSI, several improperly labeled drums were stacked in the unit. Stains were present on the grass and gravel in and around the area.
SWMU 3	**D-Waste Storage Tank**
Unit Description:	Adjacent to the Hazardous Waste Storage Area (SWMU 2) is a 6,000-gallon, single-walled steel tank used for the bulk accumulation waste paint materials. The tank does not rest on concrete or have any secondary containment (see Photograph No. 2). Drums of ignitable D-wastes are brought to the area and

	pumped into the bulk tank; eventually the wastes are removed from the facility by bulk by Ecolotec for incineration.
Date of Startup:	The unit has been used since 1980.
Date of Closure:	The unit is active. It was listed on the original 1980 Part A permit application for the facility and has apparently not been RCRA closed.
Wastes Managed:	The unit is used for storage of waste paint materials (D001, D007, and D008) for less than 90 days.
Release Controls:	The unit has no secondary containment.
History of Documented Releases:	No releases from the unit have been documented.
Observations:	During the VSI, stains were present on the grass and gravel in and around the area, and spilled material was noted on the bulk tank.
SWMU 4	**F-Waste Storage Tank**
Unit Description:	The F-Waste Storage Tank is located outdoors in the southeastern portion of the facility. The aboveground tank is constructed of carbon steel and has a capacity of about 5,000 gallons. The tank sits on a 10- by 10-feet unsealed concrete base, surrounded by a 3-foot high concrete dike. The tank is used strictly for less than 90 day accumulation of nonhalogenated waste paint thinners (Carboline, 1992b).
Date of Startup:	The tank has been used to store hazardous waste since about 1982. The Carboline representative did not know what the tank was used for before that time.
Date of Closure:	The unit is active.
Wastes Managed:	The tank is used for the accumulation of nonhalogenated waste paint thinners (F003 and F005).

Release Controls:	The tank has a capacity of about 5,000 gallons and sits on a 10- by 10-foot unsealed concrete base, surrounded by a 3-foot-high concrete dike.
History of Documented Releases:	No releases have been documented from this unit.
Observations:	During the VSI, the unit appeared to be in sound condition, and no signs of spills or stains were noted.
SWMU 5	**Kettle Cleaning Area**
Unit Description:	The Kettle Cleaning Area is located in the primary production building in the southern section of the facility. The area measures about 30 by 30 feet and has an unsealed concrete floor (see Photograph No. 4). An 8-cubic-foot concrete spill containment sump is located near the center of the floor. The area is used to clean waste paint materials from kettles used in paint blending. Waste materials are accumulated in 55-gallon drums and transferred to SWMU 2 or SWMU 3.
Date of Startup:	The facility representative stated that the area has been used since the mid-1970s.
Date of Closure:	The unit is active.
Wastes Managed:	The unit stores waste paint materials (F002, F005, D001, D005, D007, and D008) and waste paint thinners (F001, F003, and F005). The wastes are stored in 55-gallon drums and eventually moved to SWMU 2 or SWMU 3.
Release Controls:	The area is indoors and has an unsealed concrete floor containing an eight-cubic-foot sump.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	During the VSI, spills and stains were noted throughout the area.
SWMU 6	**Back Pad**
Unit Description:	The Back Pad is outdoors in the western portion of the facility and has been used for an undetermined amount of time. The area consists of an uncovered and unsealed concrete pad that measures about 50 by 200 feet. The pad has no berms or secondary containment. It is used to store off-specification paint in cans and drums on pallets (see Photograph Nos. 5 through 9). Carboline stores paint in this area until a customer requests a particular grade of material stored on the pad, or until it is obvious that the material cannot be sold. The company is refurbishing a warehouse at the facility that eventually will be used to store off-specification material.
Date of Startup:	The facility contact did not know when the unit was built.
Date of Closure:	The unit is active.
Wastes Managed:	The unit is used to store off-specification paint in cans and drums on pallets. If the materials cannot be sold, they are shipped off site as wastes (F003, F005, D001, D005, D007, and D008).
Release Controls:	The unit is an unbermed, unsealed, concrete pad.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, PRC noted numerous cracks in the concrete base and evidence of spills. Most drums are stacked two-high and most cans and drums are rusting.

SWMU 6 **Back Pad**

Conclusions: The Back Pad is located in the western section of the facility and is used to store off-specification paint. The concrete base is unsealed and has numerous small cracks. There are no containment barriers for the area. Most of the containers on the pad are rusting. The potential for release to environmental media is summarized below.

On-site soils and ground water: The potential for release is high. The pad has been used for paint storage for an undetermined length of time, and numerous stains and cracks are present. PRC believes that ground water periodically is present above the bedrock beneath the facility. Because containment for the drums stored on the pad is limited and because of the permeability of the gravel deposits underlying the facility, releases from the unit could reach ground water easily.

Surface water: The potential for release is moderate. The area is about 140 feet from Shawnee Creek, and contaminants could be carried to the creek by heavy rainfall. There is an unknown potential for contaminated ground water to reach Shawnee Creek.

Air: The potential for release is moderate. The wastes stored in the unit are highly volatile.

Recommendations: PRC recommends that soil borings to bedrock with continuous split-spoon sampling be performed at the Carboline facility to define hydrogeologic conditions and to determine the presence of contamination. SWMU 6 should be subject to major investigative activity. Because of the large number of different materials used at the facility over the years, soil samples should be analyzed for hazardous waste constituents.

AOC 1 **Solvent Blending Tank Area**

Conclusions: Three solvent blending tanks are located outdoors in the southeastern portion of the facility. The tanks, used to store paint thinner, have a capacity of about 600 gallons each and sit on an unsealed concrete base. The tanks are surrounded by an 8-inch-high concrete dike that was added a number of years after the concrete base was poured. Because the

Air: The potential for release is moderate. The wastes stored in the unit are highly volatile.

Recommendations: PRC recommends that soil borings to bedrock with continuous split-spoon sampling be performed at the Carboline facility to define hydrogeologic conditions and to determine the presence of contamination. SWMU 2 should be subject to major investigative activity. Because of the large number of different materials used at the facility over the years, soil samples should be analyzed for hazardous waste constituents. PRC also recommends EPA investigate the closure status of this unit.

SWMU 4 **F-Waste Storage Tank**

Conclusions: The F-Waste Storage Tank is located outdoors, in the southeastern section of the facility. The tank is aboveground, uncovered, and sits on a concrete base surrounded by a 3-foot dike. Neither the base nor the dike is sealed. Because PRC noted no stains or evidence of spills at the tank and no cracks in the concrete surrounding the unit, the potential for release to ground water, surface water, on-site soils, and air is low.

Recommendations: Though the potential for release is low, PRC recommends that Carboline be advised to treat the containment area with a sealant.

SWMU 5 **Kettle Cleaning Area**

Conclusions: The Kettle Cleaning Area is located in the primary production building. Carboline uses the area for cleaning waste paint materials from kettles used in paint blending. The area has a concrete floor containing an eight-cubic-foot containment sump. During the VSI, PRC noted stains and spills on the floor and walls throughout the area. The potential of this SWMU to release to ground water, surface water, air, and on-site soils is low.

Recommendations: No further action is recommended for this SWMU.

the permeability of the gravel deposits underlying the facility, releases from the unit could reach ground water.

Surface water: The potential for release is moderate. The area is about 140 feet from Shawnee Creek, and contaminants could be carried to the creek by heavy rainfall. There is an unknown potential for contaminated ground water to reach Shawnee Creek.

Air: The potential for release is moderate. The wastes stored in the unit are highly volatile.

Recommendations: PRC recommends that soil borings to bedrock with continuous split-spoon sampling be performed at the Carboline facility to define hydrogeologic conditions and to determine the presence of contamination. SWMU 2 should be subject to major investigative activity. Because of the large number of different materials used at the facility over the years, soil samples should be analyzed for hazardous waste constituents.

SWMU 3 **D-Waste Storage Tank**

Conclusions: The D-Waste Storage Tank is adjacent to SWMU 2 and is used for storing waste paint materials. The tank does not rest on concrete or have any secondary containment. During the VSI, stains were present on the grass and gravel in and around the area, and spilled material was noted on the bulk tank. The potential for release to environmental media is summarized below.

On-site soils and ground water: The potential for release is high because the unit has been used since 1980 and has no secondary containment. PRC believes that ground water periodically is present above the bedrock beneath the facility. Because the unit has no secondary containment, and because of the permeability of the gravel deposits underlying the facility, releases from the unit could reach ground water.

Surface water: The potential for release moderate. The area is about 140 feet from Shawnee Creek, and contaminants could be carried to the creek by heavy rainfall. There is an unknown potential for contaminated ground water to reach Shawnee Creek.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified six SWMUs and two AOCs at the Carboline facility. Background information on the facility's location, operations, waste generating processes and waste management practices, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU 1 **Baghouse**

Conclusions: Carboline has been using the Baghouse since the early 1980s to collect and store dust from the dry pigment warehouse. The Baghouse is located outdoors, in the northeast section of the facility. The unit is made of steel and has an unsealed concrete base. The unit is adequately contained and is in sound condition. The potential for release to ground water, surface water, air and on-site soils is low because of adequate containment.

Recommendations: PRC recommends no further action.

SWMU 2 **Hazardous Waste Storage Area**

Conclusions: The Hazardous Waste Storage Area is located in the northwest section of the facility and stores waste solvents and waste paint materials in 55-gallon drums. Because there is no concrete base or containment barriers for drum storage, the area does not provide adequate containment. During the VSI, PRC noted evidence of spills on the gravel and grass surrounding the unit. The potential for release to environmental media is summarized below.

On-site soils and ground water: The potential for release is high because the area has been used since 1980 and has no containment. PRC believes that ground water periodically is present above the bedrock beneath the facility. Because there is no containment for drum storage, and because of

AOC 2 **NPDES Outfall**

Carboline's NPDES outfall is located in the southern section of the facility near the primary production building. The facility representative stated that the outfall is used discharge of storm water and noncontact cooling water to Shawnee Creek. Releases from the solvent blending tanks exited the facility to Shawnee Creek via the NPDES Outfall.

Carboline does not have a current NPDES permit. The facility representative stated that the last permit held by the company expired in 1986. Carboline immediately reapplied for a permit; however, OEPA told Carboline to follow the requirements of the expired permit. The NPDES permit requires that Carboline monitor for suspended solids, oil, grease, and pH. The facility representative stated that Carboline tests the water once a month; however, there is no information that documents such tests in OEPA files.

4.0 AREAS OF CONCERN

PRC identified two AOCs during the PA/VSI. The AOCs are discussed below; their locations are shown in Figure 2.

AOC 1 Solvent Blending Tank Area

Three solvent blending tanks, used to store paint thinner, are located outdoors in the southeastern portion of the facility at the rear of the main production building (see Photograph Nos. 10 through 12). The tanks have a capacity of about 600 gallons each and sit on an unsealed concrete base. The tanks are surrounded by an 8-inch high concrete dike that was added a number of years after the concrete base was poured. Concrete around the loading dock and drain adjacent to the tanks contained several various-sized cracks. The facility representative did not know when the tanks were installed.

As mentioned in Section 2.4, the facility representative stated that two spills have occurred from the solvent blending tanks. The first spill occurred in August 1991 during the filling of a methanol tank. About 20 gallons of methanol were released to Shawnee Creek through storm drains. Shawnee Creek borders Carboline on the southwest.

In March 1992, more than 800 gallons of a mixture of methyl ethyl ketone and toluene were released from a solvent blending tank. Carboline was able to recover about half of the released material. The rest entered Shawnee Creek through storm drains.

The facility representative stated that each of the releases killed many fish in Shawnee Creek. There is no documentation in EPA Region 5 or OEPA files of any action against Carboline for either of the releases. During the VSI, the facility representative stated that Carboline is planning to perform an investigation of the spill areas; the investigation will include a series of soil borings and sample analyses. However, OEPA is not aware of planned investigation activities, and no regulatory action is pending against Carboline.

The facility representative stated that since the time the spills from the tanks occurred, new filling procedures have been developed. He also stated that Carboline is designing a new tank farm to blend and store solvents.

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Baghouse	Early 1980s to present	None	No further action
2. Hazardous Waste Storage Area	1980 to present	During the VSI, PRC noted what appeared to be evidence of spills.	Soil borings to bedrock should be performed to define hydrogeologic conditions and to determine the presence and extent of contamination. Soil samples should be analyzed for hazardous waste constituents.
3. D-Waste Storage Tank	1980 to present	During the VSI, PRC noted what appeared to be evidence of spills.	Soil borings to bedrock should be performed to define hydrogeologic conditions and to determine the presence and extent of contamination. Soil samples should be analyzed for hazardous waste constituents.
4. F-Waste Storage Tank	About 1982 to present	None	No further action.
5. Kettle Cleaning Area	Mid-1970s to present	During the VSI, PRC noted evidence of spills in the area.	No further action.
6. Back Pad	Unknown to present	PRC noted evidence of several spills in the area.	Soil borings to bedrock should be performed to define hydrogeologic conditions and to determine the presence and extent of contamination. Soil samples should be analyzed for hazardous waste constituents.

concrete dike was added later, no seal capable of containing leaks or spills from the tanks exists. The concrete around the adjacent loading dock and drains is cracked. The facility representative has stated that two spills have occurred from the tanks and that each spill entered Shawnee Creek through storm drains. Both spills resulted in fish kills in Shawnee Creek. It is difficult to assess the quantity of spilled solvent that has entered the surrounding soils. No regulatory involvement has been documented.

Recommendations: PRC recommends that soil borings to bedrock with continuous split-spoon sampling be performed at AOC 1 to define hydrogeologic conditions and to determine the presence of contamination. Because of the large number of different materials used at the facility over the years, soil samples should be analyzed for hazardous waste constituents.

AOC 2 **NPDES Outfall**

Conclusions: Carboline's NPDES outfall discharges to Shawnee Creek and is used for releases of storm water and noncontact cooling water. The company does not possess a current NPDES permit; however, the facility representative stated that monitoring requirements of a permit that expired in 1986 are being followed. PRC located no indication of such monitoring in OEPA files. Materials from two spills from the Solvent Blending Tanks (AOC 1) exited the facility from this outfall. The potential for releases to environmental media are summarized below.

Surface water: The potential is moderate. PRC believes that because of poor waste management practices, unpermitted discharges of production and waste materials periodically occur from the NPDES outfall.

Ground water, on-site soils, and air: The potential is low. Concern about the NPDES outfall does not involve these environmental media.

Recommendations: PRC recommends that sediment sampling be performed in Shawnee Creek near the vicinity of the NPDES outfall. This effort would involve sampling above and below the outfall to evaluate possible contamination of the creek from surface-water releases from Carboline. Samples should be analyzed for hazardous waste constituents.

Table 3 (continued)

SWMU AND AOC SUMMARY

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1. Solvent Blending Tank Area	Unknown to present	The facility representative indicated that two spills have occurred from the tanks.	Soil borings to bedrock should be performed to define hydrogeology conditions and to determine the presence and extent of contamination. Soil samples should be analyzed hazardous waste constituents.
2. NPDES Outfall	Unknown	None	Sediment sampling should be performed in the vicinity of the NPDES outfall. Samples should be analyzed for hazardous waste constituents.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD030963615

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER
Carboline Company	125 Fairgrounds Road

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Xenia	OH	45385	Greene		

09 COORDINATES: LATITUDE	LONGITUDE
39° 41' 53. N	83° 56' 27". W

10 DIRECTIONS TO SITE (Starting from nearest public road)
Travel northwest on Fairgrounds Road. The Carboline facility is located 0.5 mile morthwest of the intersection of Fairgrounds and Hawkins roads.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing residential)
Carboline Company	350 Hamley Industrial Court

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
St. Louis	MO	63144	

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)
☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency Name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
☒ A. RCRA 3010 DATE RECEIVED: ___ / ___ / ___ (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ___ / ___ / ___ (MONTH DAY YEAR) ☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES ☐ NO DATE 05/07/92
BY (Check all that apply)
☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)
CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS (Check one)	03 YEARS OF OPERATION
☒ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN	1954 (BEGINNING YEAR) present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

The facility generates waste solvents, waste paint materials, and miscellaneous dust.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Potential on-site soils, ground-water, and stream sediment contamination.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☐ A. HIGH (Inspection required promptly) ☒ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Pete Zelinskas		PRC	(513)241-0149	09/12/92 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD030963615

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*
- ☒ A. SOLID
- ☒ B. POWDER, FINES
- ☐ C. SLUDGE
- ☐ E. SLURRY
- XCF. LIQUID
- ☐ G. GAS
- ☐ D. OTHER _____ *(Specify)*

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*
- TON _____
- CUBIC YARDS _____
- NO. OF DRUMS 200

03 WASTE CHARACTERISTICS *(Check all that apply)*
- ☒ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. INFLAMMABLE
- ☒ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS	90,000	pounds	Quantity on-site during VSI
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	Unknown		

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
F001, F003, F005	Waste paint thinners		Drums, Bulk tank		
F003, F005	Waste paint materials		Drums		
D001, D005					
D007, D008					
D007, D008	Miscellaneous Dust		Drums		

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

U.S. EPA Region 5 and OEPA Southwest District files, ODNR

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE: OH	02 SITE NUMBER: OHD030963615

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: ____) — ☒ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown — 04 NARRATIVE DESCRIPTION

There is a high potential for releases to ground water. Gravel deposits beneath the facility may contain ground water during and after heavy rain periods.

01 ☒ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: ____) — ☒ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 1,000 — 04 NARRATIVE DESCRIPTION

Carboline has no current NPDES permit. Solvent releases have supposedly exited the facility via the outfall to Shawnee Creek.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: ____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ____ — 04 NARRATIVE DESCRIPTION

None

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: ____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ____ — 04 NARRATIVE DESCRIPTION

None

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: ____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ____ — 04 NARRATIVE DESCRIPTION

None

01 ☒ F. CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE: ____) — ☒ POTENTIAL — ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: 60 *(Acres)* — 04 NARRATIVE DESCRIPTION

Spills have occurred at the facility and stains were noted on on-site soils during the VSI.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: ____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ____ — 04 NARRATIVE DESCRIPTION

None

01 ☒ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: ____) — ☒ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 60 — 04 NARRATIVE DESCRIPTION

Workers could be exposed from direct contact with waste materials and contaminated soils.

01 ☒ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: ____) — ☒ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 1,000 — 04 NARRATIVE DESCRIPTION

See parts A, B, and H.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	OHD030963615

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None observed.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Fish kills have been reported from solvent spills.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

See part K.

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: 05/07/92) ☐ POTENTIAL ☒ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 60 — 04 NARRATIVE DESCRIPTION

Waste solvents are currently stored on a gravel area. Some waste paint materials are stored on an unbermed, unsealed, cracked, concrete pad.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None observed.

01 ☐ O. CONTAMINATION OF SEWERS, DRAINS, WWTPS — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None observed.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None observed.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None

III. TOTAL POPULATION POTENTIALLY AFFECTED: 1,000

IV. COMMENTS

None

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

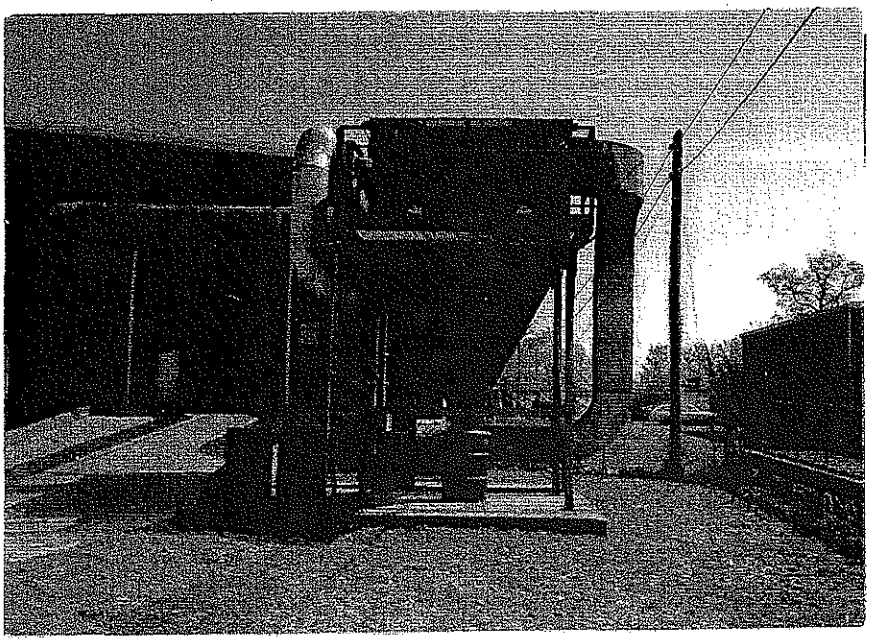
See Part 2, Section VI

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

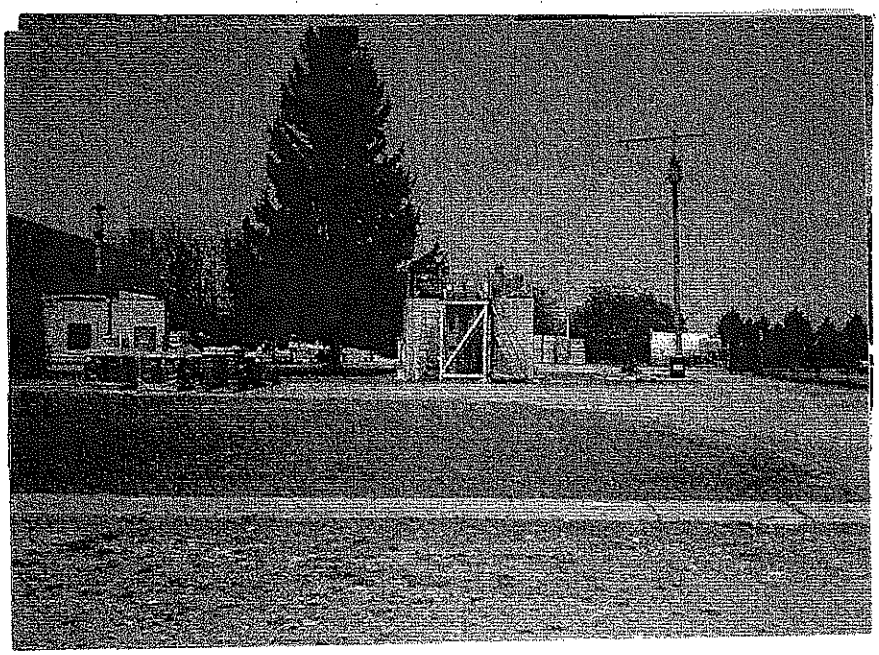
VISUAL SITE INSPECTION SUMMARY

Carboline Company
125 Fairgrounds Road
Xenia, Ohio
OHD 030 963 615

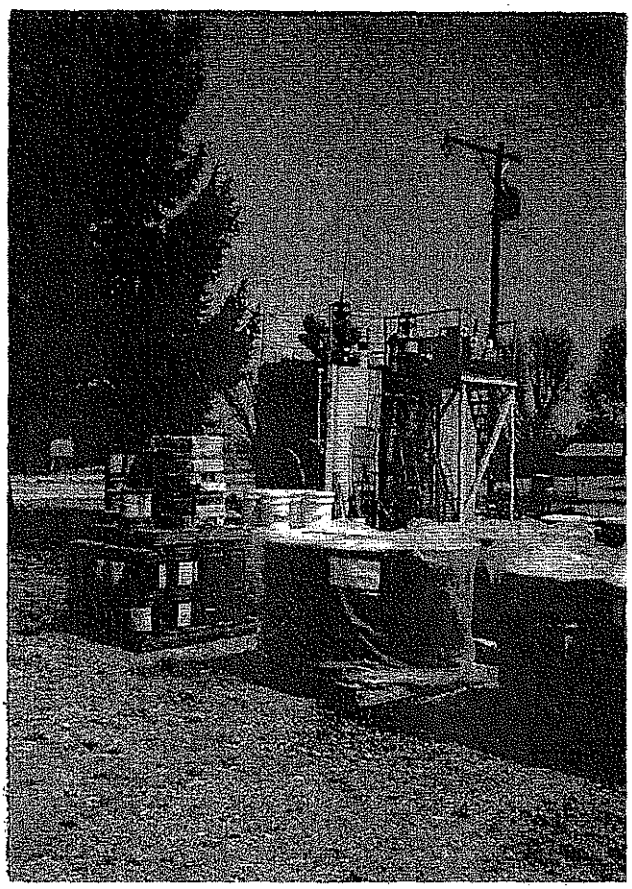
Date:	May 7, 1992
Primary Facility Representative: Representative Telephone No.:	Thomas Higgins (513)372-3511
Inspection Team:	Gabe Rood, PRC Environmental Management, Inc. (PRC) Kelly Brogan, PRC
Photographer:	Gabe Rood
Weather Conditions:	Sunny, 65°F
Summary of Activities:	The visual site inspection (VSI) began at 9:53 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representative then discussed the facility's past and current operations, solid wastes generated, and release history. The inspection team was provided with copies of requested documents. The VSI tour began at 11:05 a.m. The interior operations at the facility were examined and SWMU 4 was observed. The tour then covered the outside including SWMUs 1, 2, 3, 5, and 6, and AOCs 1 and 2. The NPDES outfall area at Shawnee Creek was also examined. The tour concluded at 12:20 p.m., after which the inspection team held an exit meeting with the facility representative. The VSI was completed and the inspection team left the facility at 12:30 p.m.



Photograph No. 1 Location: SWMU 1
Orientation: Northeast Date: 5/7/92
Description: The Baghouse at Carboline. It is used to collect fugitive dust from the warehouse in the background.

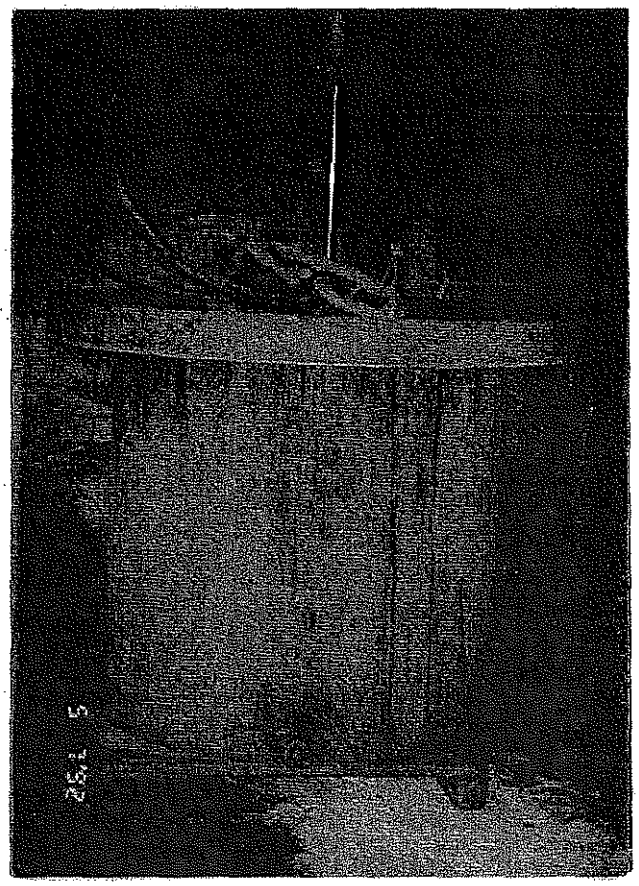


Photograph No. 2 Location: SWMUs 2 and 3
Orientation: West Date: 5/7/92
Description: The Hazardous Waste Storage Area and the D-Waste Storage Tank. Note that there is no secondary containment for the units.



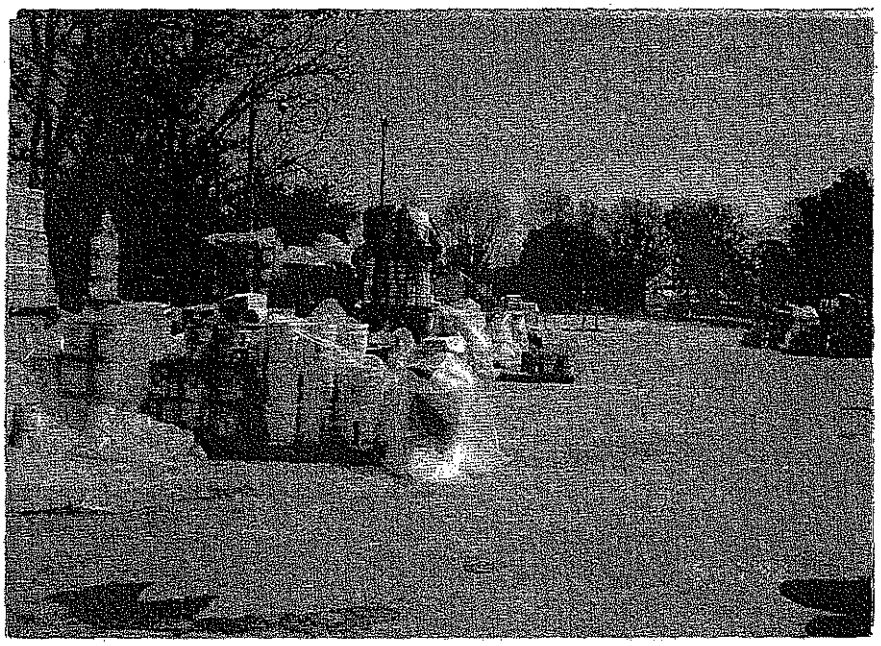
Photograph No. 3
Orientation: Northeast
Description: The Hazardous Waste Storage Area. Note the stains on the ground at the base of the pallets.

Location: SWMU 2
Date: 5/7/92



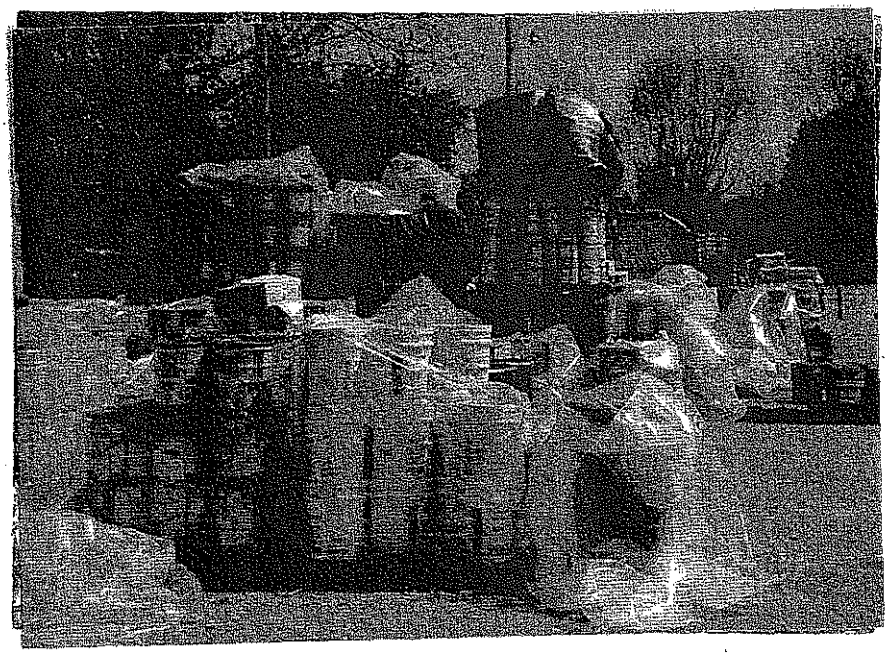
Photograph No. 4
Orientation: South
Description: The Kettle Cleaning Area.

Location: SWMU 5
Date: 5/7/92



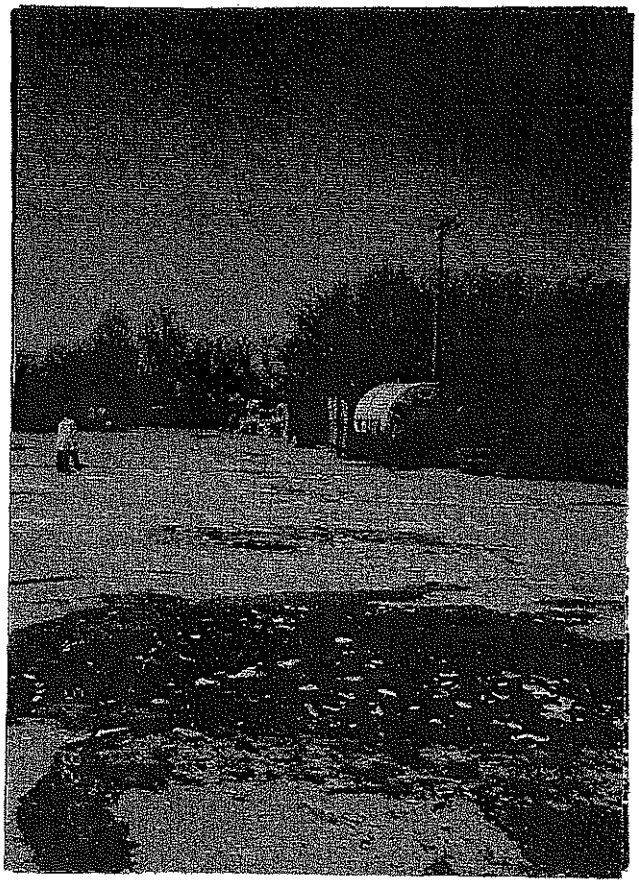
Photograph No. 5
Orientation: East
Description: The Back Pad. Note the evidence of spilled material in the foreground.

Location: SWMU 6
Date: 5/7/92

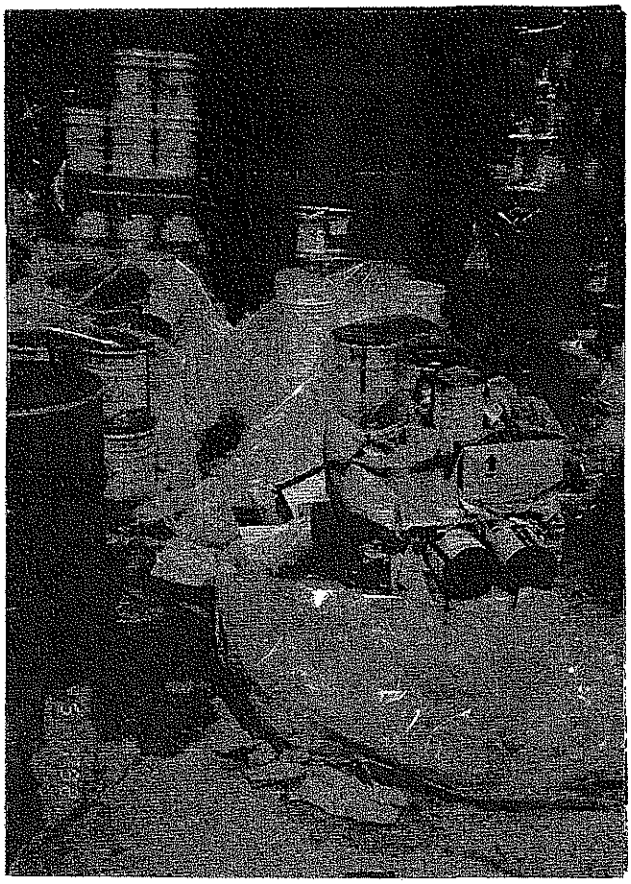


Photograph No. 6
Orientation: East
Description: The Back Pad.

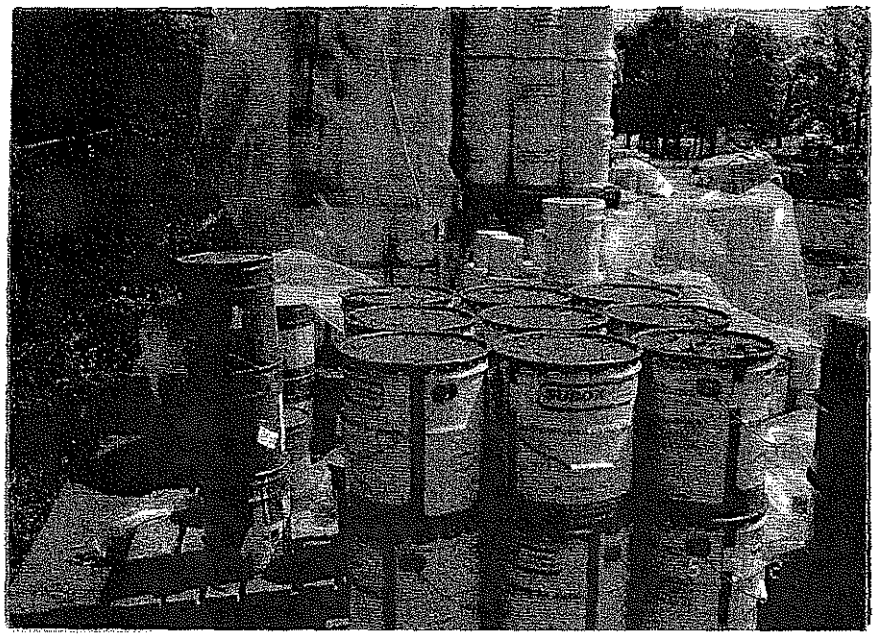
Location: SWMU 6
Date: 5/7/92



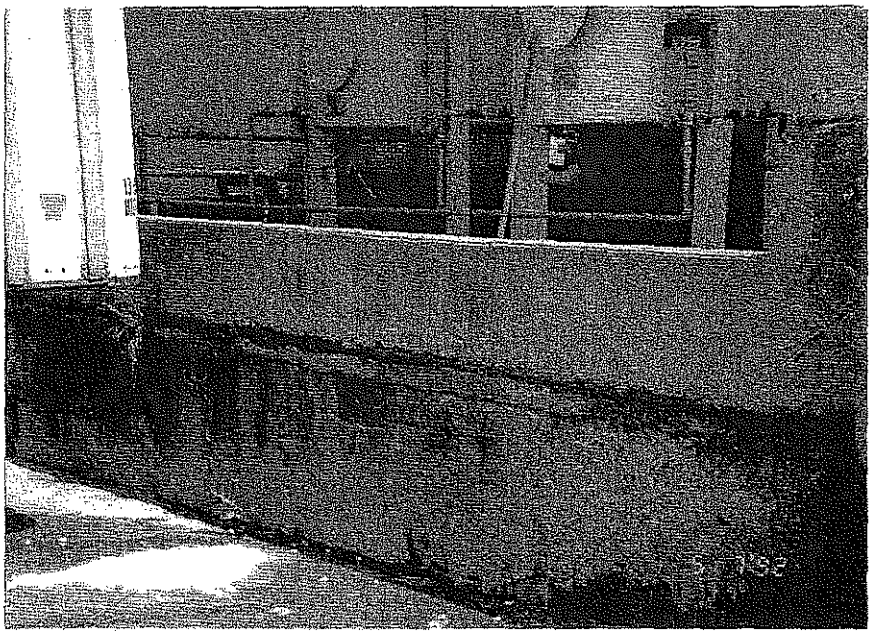
Photograph No. 7 Location: SWMU 6
Orientation: West Date: 5/7/92
Description: The Back Pad. The bulk tank is a process tank that was removed from the facility.



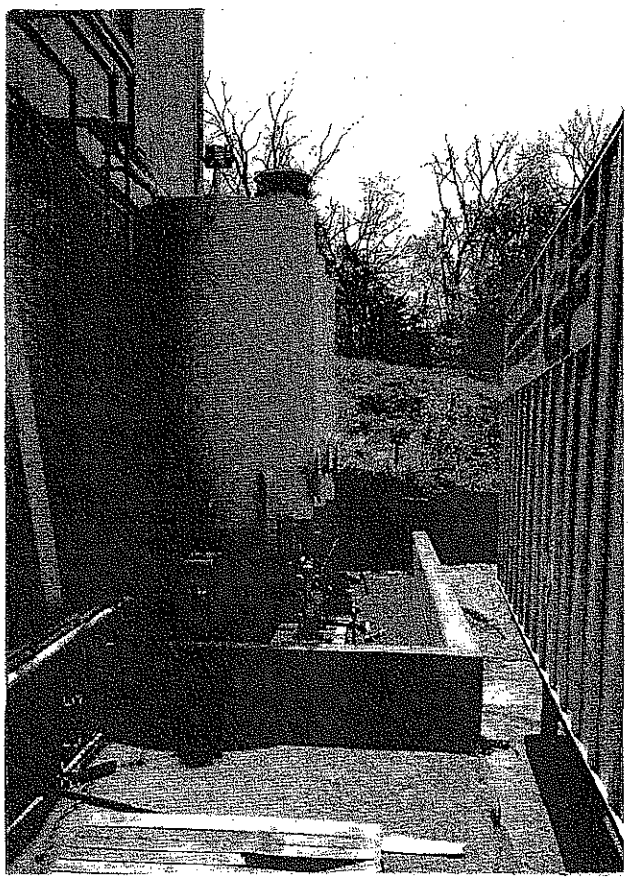
Photograph No. 8 Location: SWMU 6
Orientation: North Date: 5/7/92
Description: Rusting containers on the Back Pad. The bulk tank is a process tank that was removed from the facility.



Photograph No. 9 Location: SWMU 6
Orientation: East Date: 5/7/92
Description: Rusting containers on the Back Pad.

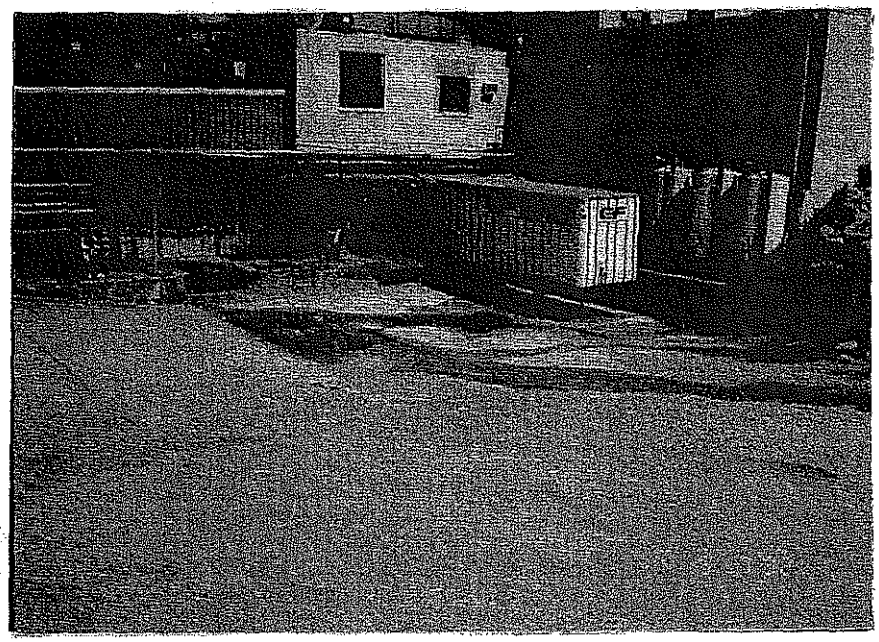


Photograph No. 10 Location: AOC 1
Orientation: West Date: 5/7/92
Description: The dike surrounding the Solvent Blending Tanks. Note the deterioration of the unit.



Photograph No. 11
Orientation: East
Description: The Solvent Blending Tanks.

Location: AOC 1
Date: 5/7/92



Photograph No. 12 Location: AOC 1
Orientation: Southwest Date: 5/7/92
Description: The three Solvent Blending Tanks are at the corner of the building.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

② Carboline Co.
009-CO508701HZF

May 7, 1992
On site 9:53

Mike Rood PRC
Kelly Brogan, PRC
① On site at Carboline Co.
Fairground Rd at Xenia, Ohio
Weather - clear, mild,
temp. approx. 65°F wind
approx. 10-5 miles an hour
out of the North
Coatings Many as they
produce Epoxy Coating specialize
Coating for construction and
Maint. of RR cars, petro chem
plants, wastewater treatment.
Nuclear Reactors etc...
Inorganic zincs included
Zinc mixed w special A
product. Carboline stocks
300 items - specialized application
process - viscosity of water to

③
sludge - largest corrosion
coating div. in country
Carboline has 3 plants
Lake Charles, Elwood and
Xenia. R+D in St Louis -
Headquarters
1983 - Xenia facility
purchased Founded in
1953, originally ~~Morain~~ Moran
Paint Co. made industrial
paint for Dayton co's. He built
the plant. Office sold farm
tractors built in the late
1940's. Early years - they
did new construction.
1980's changed - sales didn't
increase weren't building
new, headed towards
maint. w/s coat tanks,
floors, ceiling, pipes etc...
RR cars also coated
Waste water treatment plants
new area Shell, Marathon
to paint tanks, Golden Gate
Bridge.

(4) They have 1st and 3rd shifts.
55-60 people work at this facility. Part A Haz. Waste Storage area - SWMU
Haz. Waste Drums - 1982-83 contracted w/ DHM & they took all of them out. Tank is 6,000 gal. capacity - no more than 3,000 gal at a time. Accumulation drums around tank to put contents in tank. Tank put in about 1981-82. Steel Kure NPDES applied for permit in 1986 - they told them to use the old permit. Floor drains covered up. NPDES - Non contact cooling well H2O discharged from artesian well. Closure - DHM contracted & took everything away. Not sure how/ possibly happen - only has manifests.
Satellite accumulation areas?
Drums of solvent throughout plant - use until spent - pump into tank - empties at 3 levels

(5)
not used - sent out to the tank and dumped into tank.
Wastestream is dirty solvent sludge. Make decision what to discharge as to waste paint.
Dump into tank & sold for fuels blending - Ecolotech from Dayton picks it up.
Paint - F003, D001, D007, D008, F005. They used it at Southwestern Cement Plant now goes somewhere in West Virginia.
Art. Well - generates a lot of water. Pump in it - if no pump floods - artesian well - property goes down hill. Plant is 3 story plant on creek. Creek has flooding problems. 15-18 years ago built a dike b/t plant & creek. Flapper valves so water can't come back in.
Water from well - cooling H2O only. They use city H2O throughout the office Bldg.

(6)

1985 - Chemical spill tank
was unloading by tank farm
- type of resin epoxy. there was
a problem with the tank new tank
hole 4-5 ft. from bottom.
2-3 in. of insulation - no leak
no one knew hole was there
didn't have tanker pump
shut off. 260 + gallons spilled
Brought in front loader
Wicked in [illegible] [illegible]
Sid [illegible] landfilled taken
to ENVIROSafe in Oregon Ohio -
only permitted Haz waste
landfill in Ohio. Waste
streams generated products
that can't move sew - waste
stream straight forward
same thing [illegible] out with just
can use it. they've had
two a couple spills past 6-7 months
of solvents. New operation to
blend our solvents (use to
buy blended solvents) (1) left
bottom valve of tank open - overflow

(7)

(2) Dumped into full tank &
overflowed at [illegible]
happened at night. they
developed new procedures.
they are designing new
tank farm the blending
tanks outside, diked, but
the dike didn't hold. Built
dike on existing concrete - it
split solvent went through
[illegible] & cracks & into the drains
ultimate goal is to move
tanks into new area spill [illegible]!!
mix MEK + Toluene 450 gallons
all went into creek - 80
spilled, save 40 gallons.
killed fish - went down
storm water drain. One in
(1) [illegible] the other in (2) March
[illegible] smaller spill - different
solvent - one little pool
killed 7 fish alcohol methanol
solvent NPDES permit - monitor
for oil, grease, suspended solids
1 - once a month monitor

(8)

air permit - 40 pds. emission
per day. Don't have air
collection system. I have
vent system + roof stacks &
emit everything up stacks
700 chemicals on site
Toluene, Xylene, ~~MEK~~ MEK, titanium
methanole filler pigments
color pigments (lead zinc)
increasing lead out of operation
all wash solvent / storage area
in tank car. Others comes in
drums + kegs - on Vans

Excel Security - clean system
wells Piezo + fence
Summ Baghouse - waste stream
Must dust of warehouse -
in existance 6 or 7 years.
1997 + 2008 in baghouse used as
filter to [illegible] drums
[illegible] clean [illegible] times
a year waste generated
[illegible] have to clean [illegible] tanks.
[illegible] [illegible] - use a [illegible]
not [illegible] any more b/c

(9)

[illegible] [illegible] very
well - clean tanks by
hand ~~[illegible]~~ now.
spill area - [illegible] control [illegible]
constant flow of H2O [illegible]
[illegible] - may not [illegible]
[illegible] soil [illegible] waste
stored [illegible] at the
facility - [illegible] all shipped
to Beavercreek, Ohio.
[illegible]
outside [illegible]
~~[illegible]~~ [illegible] renovating
warehouse [illegible] to [illegible]
[illegible]
[illegible] tank [illegible]
~~Summ~~ - 6,000 gal. tank
outside by warehouse
10 X 5 feet - no containment
[illegible] by valve
on [illegible] Accumulation
start date 4-23-92 ND
KIR waste [illegible] 20 [illegible] drums
~~Tanks~~ [illegible]
[illegible] put in the tanks

(10)

3 KLB

D035, F001 → drums
P035 (EPA waste #s)
From the spill in
March 1992 there
is also 3 skids up to
to 3 levels of small 5 gal
buckets waiting to be
dumped into the tank
evidence of spills around
drums + Buckets (5 gal)
are rusty. Dates on
larger drums 4/21/92
Drums are not marked
very well - No EPA waste
code. [illegible] in 2 smaller
drums of the 55 gal
drums. Some 5 gal
buckets are smashed
[illegible] [illegible] [illegible]
[illegible] the ~~[illegible]~~ KLB, Haz. waste storage tank.
Surrounding area -
residents within 500
feet to the N+W.
Area to the S. Fairgrounds
to the ~~[illegible]~~ KLB N. Business to

(11)

the East and more residents.
Off site at 12:30pm.

Kelly L. Bragan
9/7/92

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

MAR 30 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Wm. J. Stewart
Carboline Company
350 Hanley Industrial Court
St. Louis, MO 63144

RE: Interim Status Acknowledgement USEPA ID No. OHD030963615
FACILITY NAME: Carboline Company

Dear Mr. Stewart:

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

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

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

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

Sincerely yours,

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

Enclosure

cc: J. D. Porthouse

Kbonner 3/29/82

DJB 3/30/82

XA

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

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

EPA I.D. NUMBER ➤ OHD030963615 REACKNOWLEDGEMENT

CARBOLINE COMPANY
350 HANLEY INDUSTRIAL COURT
ST LOUIS MO 63144

INSTALLATION ADDRESS ➤ 125 FAIRGROUNDS ROAD
XENIA OH 45385

EPA Form 8700-12B (4-80)

09/29/81

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

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

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I. INSTALLATION'S EPA I.D. NO: OHD030963615

II. NAME OF INSTALLATION: CARBOLINE CO

II. INSTALLATION MAILING ADDRESS: ~~125 FAIRGROUND RD~~ XENIA, OH 45385

0002

III. LOCATION OF INSTALLATION: 125 FAIRGROUND RD XENIA, OH 45385

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

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: FOHD030963615 T/A: 2 C: 1

APPROVED: A

DATE RECEIVED (yr., mo., & day): 800X1F

I. NAME OF INSTALLATION

Carboline Company

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: P O Box 370

CITY OR TOWN: Xenia ST: OH ZIP CODE: 45385

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 125 Fairground Road

CITY OR TOWN: Xenia ST: OH ZIP CODE: 45385

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title): 2 Stewart W J Mgr Corp Eng

PHONE NO. (area code & no.): 3146441000

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 Carboline Company

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

F = FEDERAL
M = NON-FEDERAL

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

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

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

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

VIII. FIRST OR SUBSEQUENT NOTIFICATION

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

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

C. INSTALLATION'S EPA I.D. NO.: OHD030963615

IX. DESCRIPTION OF HAZARDOUS WASTES

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

D. – FOR OFFICIAL USE ONLY

W		I

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

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

1	2	3	4	5	6
F003	F005				
7	**8**	**9**	**10**	**11**	**12**

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

13	14	15	16	17	18
K078	K081				
19	**20**	**21**	**22**	**23**	**24**
K079	K082				
25	**26**	**27**	**28**	**29**	**30**

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

31	32	33	34	35	36
U002	U125	U159	U220	U031	U069
37	**38**	**39**	**40**	**41**	**42**
U013	U140	U161	U238	U088	U102
43	**44**	**45**	**46**	**47**	**48**
U124	U154	U169	U239	U112	U160

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

49	50	51	52	53	54

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

[X] 1. IGNITABLE (D001) [ ] 2. CORROSIVE (D002) [ ] 3. REACTIVE (D003) [X] 4. TOXIC (D000)

X. CERTIFICATION

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

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Ardell E. Pitt	Ardell E. Pitt Manager of Manufacturing	8/15/80

SEP 2 8 1984

5HW-13

J. Davis Porthouse, President
Carboline Company
125 Fairgrounds Road
Xenia, Ohio 45385

RE: Withdrawal of Part A
Recission of Part B Call-in
FACILITY NAME: Carboline Company
U.S. EPA ID #: OHD 030-963-615

Dear Mr. Porthouse:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status, and formally rescinds the call-in of the Part B application.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation. The Part B application would need to contain all of the information required by 40 CFR 270.14-270.16 (formerly 40 CFR 122.25).

Should you propose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to $25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

Sincerely yours,

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

cc: Tom Carlisle, Ohio EPA
Cheryl Kaiser, Ohio EPA

William J. Stewart, Manager-
Corporate Engineering

Michael Hasser, Plant Manager
bcc: Lisa Pierard
Part A file
Rebecca Strom
Chuck Slaustas

5HW-13:RStrom:JTurner:9-28-84

	INITIALS	DATE
TYPIST		10/1/84
AUTHOR		10/1/84
STU #1 CHIEF		
STU #2 CHIEF		10/1/84
STU #3 CHIEF		
TPS CHIEF		10/1/84
WMB CHIEF		10/3/84

SEP 26 1984

5HW-13

J. Davis Porthouse, President
Carboline Company
125 Fairgrounds Road
Xenia, Ohio 45385

RE: Withdrawal of Part A
Recission of Part B Call-in
FACILITY NAME: Carboline Company
U.S. EPA ID #: OHD 030-963-615

Dear Mr. Porthouse:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status, and formally rescinds the call-in of the Part B application.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation. The Part B application would need to contain all of the information required by 40 CFR 270.14-270.16 (formerly 40 CFR 122.25).

Should you propose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to $25,000 per violation.

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Sincerely yours,

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

cc: Tom Carlisle, Ohio EPA
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William J. Stewart, Manager-
Corporate Engineering

Michael Hasser, Plant Manager

bcc: Lisa Pierard
Part A file
Rebecca Strom
Chuck Slaustas

5HW-13:RStrom:JTurner:9-28-84

TYPIST | AUTHOR | UTS #1 CHIEF | UTS #2 CHIEF | UTS #3 CHIEF

carboline.
PROTECTIVE COATINGS
FOR CORROSION RESISTANCE • WATERPROOFING • FIRE PROTECTION • ROOFING

AREA CODE 314
644-1000

CABLE-CARBOCO-ST.LOUIS
TELEX 44-7332

August 26, 1982

Ms. Kathleen Homer
RCRA Activities
Part B Permit Application
USEPA Region V
P.O. Box A3587
Chicago, IL 60690-3587

Dear Ms. Homer:

Per my conversation with Richard Karl of the Region V Office this letter serves as notification of our intent to withdraw our Part A application for hazardous waste storage facility at our location in Xenia, Ohio, EPA # OHD030963615. The waste that was stored at this location was removed and disposed of by M & M Chemical Company, EPA # ALD070513767 and Associated Chemical an Enviornmental Services Company, EPA # OHD045243706. The liquid material in the drums was removed from the drums by these companies and incinerated or used as fuel. The drums and the remaining solids were compacted and disposed of in regulated landfills. We have contracted the A.M. Kinney Company, a consulting engineering firm in Cincinnati, to survey the facility and certify that the waste stored over 90 days has been removed. I will forward their certifiction to your attention when it is received.

We will continue to be a hazardous waste generator. If you have any questions or need any further information, please feel free to contact us.

Sincerely,

William J. Stewart

William J. Stewart
Manager of
Corporate Engineering

lrb/l/331/
Homer/082682

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

Form Approved OMB No. 158-R0175 225

FORM **1** GENERAL

EPA ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F O H D 0 3 0 9 6 3 6 1 5

GENERAL INSTRUCTIONS

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

LABEL ITEMS

- I. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

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

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

III. NAME OF FACILITY

1 SKIP: CARBOLINE COMPANY

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 STEWART, WM. J, MGR, CORP, ENGR.	314 644 1000

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	
3 350 HANLEY INDUSTRIAL COURT	

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 ST LOUIS	MO	63144

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
5 125 FAIRGROUNDS ROAD	

B. COUNTY NAME:

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 XENIA	OH	45385	

NOV 18 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

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

A. FIRST	B. SECOND
2850 (specify) Paint Manufacturing	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

CARBOLINE COMPANY

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO

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

P (specify)

D. PHONE (area code & no.)

A 513 372 3511

E. STREET OR P.O. BOX

125 FAIRGROUNDS ROAD

F. CITY OR TOWN | **G. STATE** | **H. ZIP CODE**

XENIA | OH | 45385

IX. INDIAN LAND

Is the facility located on Indian lands?
☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N OH0031461	9 P
B. UIC (Underground Injection of Fluids)	**E. OTHER (specify)**
9 U	9 (specify)
C. RCRA (Hazardous Wastes)	**F. OTHER (specify)**
9 R	9 (specify)

XI. MAP

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

F-9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Resins, pigments, and solvents (raw materials) are mixed together according to customer needs to make architectural and marine coatings (paint). Paint is made in batch quantities of up to 1000 gallons in large tanks. The materials are mixed together and then discharged through a valve at the bottom of the tanks into 5-gallon containers used for shipment.

F9: A/51

XIII. CERTIFICATION (see instructions)

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

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
J. D. Porthouse Vice-President of Operations		11/18/80

COMMENTS FOR OFFICIAL USE ONLY

C

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

Form Approved OMB No. 158-S80004 236

FORM 3 RCRA

EPA

ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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

I. EPA I.D. NUMBER: F 0 H D 0 3 0 9 6 3 6 1 5 3 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

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

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

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

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

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: C 8 | YR. 57 | MO. 01 | DAY 01

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. | MO. | DAY

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

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

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

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

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

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

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

C DUP 3 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	16,500	G	
2	S 0 2	7000	G	
3				
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

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

IV. DESCRIPTION OF HAZARDOUS WASTES

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

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

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

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

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

D. **PROCESSES**

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

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

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

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

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

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

Continued from page 2.

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

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)

W	0	H	D	0	3	0	9	6	3	6	1	5	3	1

FOR OFFICIAL USE ONLY

W	DUP	3	2	DUP

D. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K 0 7 8	851,4000	P	S 0 1 S 0 2	
2	K 0 7 9				Included with above.
3	K 0 8 1				Included with above.
4	F 0 0 2	283,8000	P	S 0 1 S 0 2	
5	F 0 0 3				Included with above.
6	F 0 0 5				Included with above.
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

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

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

F | O | H | D | 0 | 3 | 0 | 9 | 6 | 3 | 6 | 1 | 5 | 3 | 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail). F.G. 1 A/SS

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail). F.G. 1 A/SS

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
8 3 5 6 2 7	3 9 4 1 5 3

VIII. FACILITY OWNER

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

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

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

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

IX. OWNER CERTIFICATION

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

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
J. D. Porthouse Vice-President of Operations		11/18/80

X. OPERATOR CERTIFICATION

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

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*

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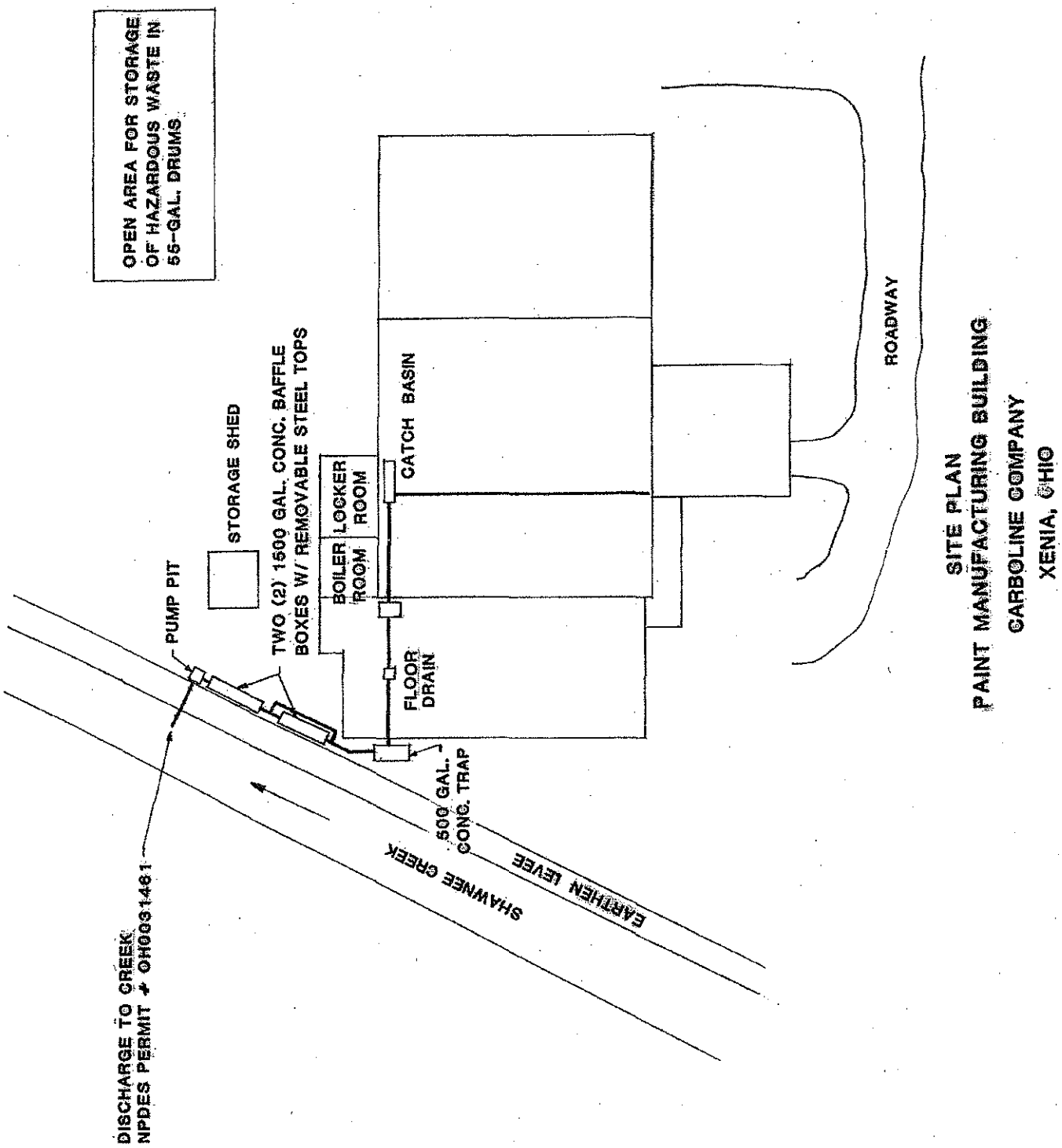
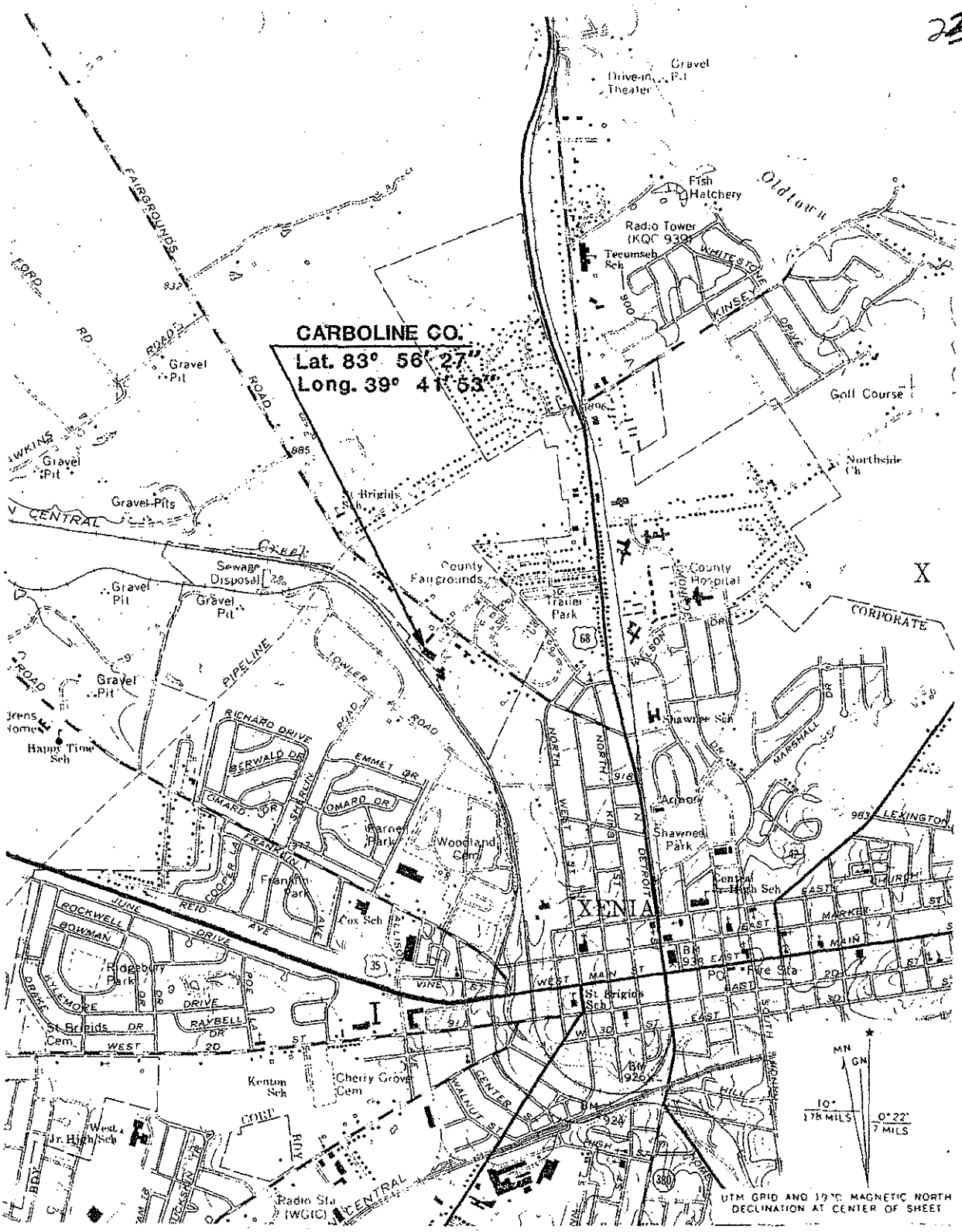




Scale 1 : 24,000

0 — 1 Mile

USGS Map Xenia, Ohio

Location Map
Carboline Co.
Xenia, Ohio

Certified mail
P 371 345 961

DEC 12 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William J. Stewart
Manager of Corporate Engineering
Carboline Company
350 Hanley Industrial Court
St. Louis, Missouri 63144

RE: [illegible]
Carboline Company
125 Fairgrounds Road
Lenis, Ohio 45324

Dear Mr. Stewart:

Thank you for your letter of August 24, 1982, in which you stated your organization's intent to withdraw the Part A application for the hazardous waste storage facility located in Lenis, Ohio. You stated that the basis for withdrawal was the fact that hazardous materials which were stored in drums were removed from the drums and disposed of, by either incineration or burning at Fuel. Also, the drums and remaining solid materials were compacted and disposed of in regulated landfills. In your submittal, it appears that your organization has attempted to comply with the provisions of 40 CFR 265.111.

We believe that it was your intent to properly dispose of your drummed wastes in a manner which would not endanger human health or the environment. However, the following provisions of 40 CFR Part 6 were not followed:

a. An acceptable closure plan should have been submitted to the Regional Administrator at least 180 days before the date that closure is expected to commence;

b. The proposal to close the storage facility should have been subject to a public comment period;

c. The closure plan should have received approval from the Regional Administrator prior to its implementation.

To substantiate your claim that hazardous wastes were properly managed during the closure of your hazardous waste management facility, certifications by both the owner or operator of the facility, and by an independent registered professional engineer must be submitted to this office. Also, a copy of the closure plan which was followed during the closure should be submitted to us. These submissions should be made as soon as possible but in no case later than 45 days after receipt of this letter.

In addition, we may request that an inspection of your facility be conducted by the Ohio Environmental Protection Agency (OEPA) in the future. The purpose of the inspection would be to further confirm that all hazardous wastes were removed in accordance with applicable provisions of the regulations.

After receipt and review of the closure plan and the above mentioned certification, we will be able to consider your request to have your storage facility removed from our data base. Subsequently, your status will be that of a generator only.

If you have any questions and desire additional information, please contact Charles Slaustas of my staff at (312) 353-2674.

Sincerely,

William K. Miner, Chief
Technical, Permits and Compliance Section

cc: Paul Flanigan, OEPA

bcc: Kathy Homer, Ohio SIO
LaNita Marrable, Versar
Permit File

AREA CODE 314
644-1000

CABLE-CARBOCO-ST.LOUIS
TELEX 44-7332

carboline®

PROTECTIVE COATINGS
FOR CORROSION RESISTANCE • WATERPROOFING • FIRE PROTECTION • ROOFING

December 17, 1982

Mr. William H. Miner, Chief
Technical, Permits and Compliance Section
U.S. Environmental Protection Agency
Region V
111 West Jackson Blvd.
Chicago, IL 60604

RECEIVED
DEC 2 71982
WASTE MANAGEMENT BRANCH
EPA, REGION V

Subject: OHD030963615 PA, G, TSO
Carboline Company
125 Fairgrounds Road
Xenia, Ohio 45385

Dear Mr. Miner:

You requested certification from an official in our company and a certified engineer as to the closure of our hazardous waste storage facility in Xenia. I am enclosing both certifications with a copy to the Ohio EPA. You requested a copy of our closure plan which was given to your Mr. Charles Slaustas when he inspected our facility on December 13, 1982.

If you have any other needs, please let me know as soon as possible.

Sincerely,

William J. Stewart
Manager
Corporate Engineering

RECEIVED 12/29/82

WJS:dd
Enclosures
cc: Mr. Thomas Carlisle
State of Ohio EPA
Columbus, Ohio 63216
cc: Mr. Jeffrey G. Hines
Southwest District Office
Dayton, Ohio 45402-2086
cc: Mr. Jim Robertson/Mr. Paul Robinson

I, J. David Porthouse, certify under penalty of law that I am familiar with the facility listed below and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the following statement is true and accurate. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

The facility located in Xenia, Ohio was closed as a hazardous waste storage facility following the closure plan which had been previously submitted to the Ohio EPA. The material was removed and disposed of in regulated landfills and/or burned in accordance with regulation 40CFR265.111.

Facility ID #: OHD 03 096 3615

(Signature)

President
(Title)

December 22, 1982
(Date)

*This certification must be signed in accordance with the requirements of 40 CFR Part 122.6.

Sun Company, Inc.
2000 Market Street
Philadelphia PA 19103

July 13, 1982

Mr. Thomas B. Golz
Waste Management Branch
230 South Dearborn St.
Chicago, IL 60604

Dear Mr. Golz,

I have attached the Certificate of Insurance prepared by the Royal Insurance Company on behalf of Sun Company, Inc. in compliance with the liability requirements for Sudden and Accidental coverage under the Resource Conservation and Recovery Act of 1976, as amended.

If there is a question on our submission, please contact the undersigned.

Very truly yours,

Susan F. Graef
Treasury Analyst
Insurance Department

SFG:pg
Attachment

cc: M. L. Beck - 27/10PC (w/ attach)
L. T. Clere - Toledo Refinery (w/ attach)
A. K. Delarue - A & A (w/o attach)
W. K. Lorenz - 21/10PC (w/ attach)
C. P. McMahon - 25/1845 (w/ attach)
W. Sterwart - Carboline Co., 350 Hanley Industrial Court, St. Louis, MO 63144

HAZARDOUS WASTE FACILITY
CERTIFICATE OF LIABILITY INSURANCE

1. The Royal Insurance Company of America of 150 William Street, New York, New York 10038 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Sun Company, Inc., the "Insured" of 2000 Market Street, Philadelphia, Pennsylvania 19103 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies, as per attached listing of EPA Identification number and name and address for each facility, for "sudden accidental occurrences". The limits of liability are $1,000,000 "each occurrence" and $2,000,000 "annual aggregate" exclusive of legal defense costs. The coverage is provided under policy number PTG 316214 issued on 4/1/82. The effective date of said policy is 4/1/82.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

   (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

   (b) The Insured is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).

   (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

   (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of EPA Regions in which the facilities are located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess of surplus lines insurer, in one or more States.

Allana C. Leigh, Underwriter

Authorized Representative Of
Royal Insurance Company of America
150 William Street
New York, N.Y. 10038

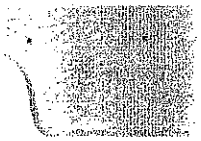
Name and address of Certificate Holder

Thomas B. Golz
Waste Management Branch
230 South Dearborn St.
Chicago, Ill. 60604

SCHEDULE

FACILITY	LOCATION	E.P.A. IDENTIFICATION NUMBER
Sun Tech	Marcus Hook, Pa.	PAD080790991
Smith Oil	Rockford, Ill.	ILD053197547
Carboline	Xenia, Oh.	OHD030963615 GRH
Carboline	Lake Charles, La.	
Sun Refining	Marcus Hook, Pa.	
Sun Refining	Marcus Hook, Pa.	
Sun Refining	Marcus Hook, Pa.	
Sun Refining	Toledo, Oh.	GOHD0050465 11
Sun Refining	Toledo, Oh.	GOHD0050465 11
Sun Refining	Yabucoa, PR	PRT000040782
Sun Refining	Tulsa, Ok.	OKD058078775
Sun Refining	Tulsa, Ok.	OKD058078775
Sun Refining	Tulsa, Ok.	OKD058078775
Sun Refining	Tulsa, Ok.	OKD058078775

B. Permit Application /Post Permit



OhioEPA

Re: Hazardous Waste Activity Status
U.S. EPA I.D. No. OHD030963615 G, PA-3, N
Ohio Permit No. 05-29-0573

April 1, 1985

Paul Robinson
Plant Engineer
Carboline Company
125 Fairgrounds Rd.
Xenia, Ohio 45385

Dear Mr. Robinson:

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

Thomas E. Crepeau

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

TEC/ds

Enclosure

cc: U.S. EPA, Region V
HWFB
D.O.

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

1 P23-6855938

MAR 31 1982

5HW-7TS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Stewart
Carboline Company
350 Hanley Industrial Court
St. Louis, Missouri 63144

RE: OHD039993815
Carboline Company
125 Fairgrounds Road
Xenia, Ohio 45385

Dear Mr. Stewart:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute a Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than September 30, 1982. Please send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Richard Karl of my staff at (312) 886-7447, as you begin preparing your application. Mr. Karl will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

While your complete application is due no later than the above date, you are encouraged to submit at your earliest opportunity those components which have been completed. Several interim status documents also are used as components of your Part B application. Included are such items as your waste analysis plan, contingency plan, closure plan, etc., each of which may be submitted to this office immediately, to initiate the processing of your Part B application.

Failure to furnish your complete Part B application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 122.23.

Information you submit in the Part B application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (USEPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. USEPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment and storage facilities. These standards will become applicable upon issuance of a permit to your facility by USEPA.

We will coordinate review of your application with the Ohio Environmental Protection Agency and the Hazardous Waste Facility Approval Board, and if your application is acceptable, will strive for a simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of your application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the State in lieu of USEPA will make the final determination on your application.

We look forward to receiving your Part B application.

Sincerely yours,

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

Enclosures: 40 CFR 122.25
40 CFR 264

cc: J.D. Porthouse

Paul Flanigan, OEPA
Peggy Vince, HWFAB

INITIALS		K. Homer					
DATE		3/31/82					

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-TUB

MAY 20 1982

Mr. Wm. Stewart
Carboline Corp.
350 Hanley Ind. Ct.
St. Louis, Missouri 63144

RE: EPA ID# OHD030963615
Carboline Corp.
Xenia, Ohio 45285

Dear Mr. Stewart:

Recently, we requested you to submit a Part B application for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program.

In an attempt to coordinate the review of your application with the Ohio Environmental Protection Agency (OEPA), and striving for a simultaneous issuance or denial of Federal and State hazardous waste facility permits, we urge you to submit three copies of your Part B to OEPA at the same time it is submitted to this Agency. The mailing address for OEPA is:

Ohio Environmental Protection Agency
Division of Hazardous Materials Management
361 East Broad Street Box 1049
Columbus, Ohio 43216

Your direct submittal is necessary to allow OEPA to begin processing under Ohio state law. If you send copies directly to OEPA, you need send only three (rather than four) copies to USEPA.

If you have questions concerning the Ohio permitting process, please contact Mr. Paul Flanigan of OEPA at (614) 462-6303, or Mr. Bob Fragale of the Ohio Hazardous Waste Facility Approval Board at (614) 462-6981. If you have questions concerning the Federal permit process, please contact your permit-writer in this Agency, or Ms. Kathleen Homer, State Implementation Officer for Ohio, at (312) 886-6148.

Sincerely yours,

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

cc: Paul Flanigan - OEPA
Bob Fragale - HWFAB

OhioEPA
State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, OH 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

December 22, 1998

RE: CARBOLINE
HAZARDOUS WASTE
GREENE COUNTY
OHD030963615
NOTICE OF VIOLATION
FAXED

Mr. Tom Calkins, QA/QC Manager
Carboline
125 Fairgrounds
Xenia, Ohio 45385

Dear Mr. Calkins:

On December 8, 1998 and December 17, 1998 Ohio EPA, represented by me, conducted a compliance evaluation inspection of Carboline's Xenia facility. You represented Carboline. On December 8, 1998, I was accompanied by Tamara Aull, U.S. EPA, Region 5, who conducted an AA, BB, CC organic emissions regulations inspection. Ms. Aull will contact you in regard to that portion of the inspection. A walk through of the facilely was conducted on December 8, 1998 and a review of paperwork occurred on December 17, 1998. I have enclosed a copy of the completed checklist for your review. Based on the findings during the inspection visits of December 8 and 17, 1998, Carboline is in **violation** of the following state hazardous waste rules.

1. **Amendment of contingency plan, OAC 3745-65-54(C).** This rule requires that when a facility changes in its design, construction, operation, maintenance, or in other circumstances it is necessary to amend the contingency plan. Carboline failed to revise their contingency plan since the 1995 submittal to Ohio EPA. A review of the 1995 Carboline contingency plan by Ohio EPA revealed the following areas needed updating.

   a. Section F. Emergency Contacts- local phone numbers-area codes have changed for some from area code 513 to 937.
   b. Section G. Description of Site Activities. 1.A. Reference is made to the first floor hazardous waste container storage area. I was informed the first floor is no longer used for hazardous waste storage.
   c. Section G. Description of Site Activities. 1.B. 2.a. Outside Bulk Storage. Reference is made to 2 vertical hazardous waste tanks at the rear of the plant. The 2 hazardous waste tanks were removed in 1994.
   d. Section G. Description of Site Activities. 1.B.2.c. Security. Reference to spent solvent tanks in the next to last sentence of paragraph two.
   e. Figures. Emergency Exits. Diagrams for first and second floors are not accurate with present conditions at the facility. The hazardous waste container storage area is now on the second floor instead of the first floor. You may want to re-evaluate your primary exit for the second floor.

f. Section F. Response. Area codes need updated. The location of the Ohio EPA Central Office has changed. Their new location is

Mailing Address	Street Address
Ohio EPA	Ohio EPA
Lazarus Government Center	Lazarus Government Center
P.O. Box 1049	122 South Front Street
Columbus, Ohio 43216-1049	Columbus, Ohio 43215

g. Section 5. Notification. Diagram of facility. Last page of contingency plan. Location has changed for hazardous waste storage area.

2. **Personnel Training, OAC 3745-65-16(A)(2).** This rule requires generators to train employees in the use of the contingency plan. Training records reviewed did not indicate that employees handling hazardous waste had been trained in the use of the contingency plan.

GENERAL COMMENTS

During the inspection Ohio EPA discovered that the first floor hazardous waste container storage area had been moved to the east end of the second floor. You informed me that Carboline would no longer be using the first floor hazardous waste container storage area. Since Carboline has operated as a large quantity generator, they are required to follow **Ohio Administrative Code (OAC) 3745-52-34(A)(1)(d), OAC 3745-66-11(A)(B) and OAC 3745-66-14** in closing the first floor hazardous waste storage area. Ohio EPA's Division of Hazardous Waste Management has a policy paper on generator closures. The policy can be found on Ohio EPA's web page at www.epa.oh.us. There are different closure activities described in the policy for container storage areas based on the type of pad and waste handling history. Ohio EPA recommends that your former hazardous waste container storage area be closed as soon as possible to avoid future complications of closing the unit, such as future contamination of the unit. If you choose option 1 or 2 of the policy, please call me and I will visit your facility to review inspection logs and a signed statement from the facility.

Please submit the revised pages to the contingency plan and actions you plan to take in training employees in the use of the contingency plan to this office within 30 days of the date of this letter.

Failure to list specific deficiencies in this communication does not relieve Carboline from the responsibility of complying with all applicable hazardous waste rules.

If you have should have any questions or comments in regard to the inspection or generator closure procedures, please feel free to call me at (937)285-6089.

Sincerely,

Timothy E. Staiger, CHMM
Division of Hazardous Waste Management

TES/laj

Enclosure

cc: Tom Higgins, Carboline Environmental Manager, w/o enclosure
Tamara Aull, U.S. EPA, Region 5
Linda Neumann, DHWM/CO, w/enclosure

Re: Greene County
Hazardous Materials Management
Carboline Company
Generator
OHD030963615

CERTIFIED MAIL

Mr. Michael Hasser, Plant Manager
Carboline Company
125 Fairground Road
Xenia, Ohio 45385

March 1, 1984

Chuck S. 17 pull

Dear Mr. Hasser:

An inspection of Carboline Company was conducted on February 22, 1984 to determine compliance status with the applicable portions of the Hazardous Waste Rules of the Ohio EPA (Ohio Administrative Code Sections 3745-50 thru 69). At that time, I met with Mr. Paul Robinson, Plant Engineer, to review the required paperwork and tour the storage area.

The inspection reveals the following deficiencies:

1. Personnel Training is approximately one month overdue for the annual refresher training requirement (OAC 3745-65-16).

   The Sun Company slide program is suitable for general RCRA training, but your program must include facility-specific instructions in safe equipment operation and emergency response procedures, i.e. contingency plan implementation (OAC 3745-65-16).

   Records of personnel training must include an outline of the training presentation, the name and qualifications of the instructor, date of presentation, written job titles and job descriptions (OAC 3745-65-16).

2. At the time of the inspection two drums with accumulation start dates of November 11, 1983 were observed. As a Generator you are limited to storage of hazardous wastes for periods less than 90 days (OAC 3745-52-34).

   Mr. Robinson indicated that delays were caused by severe winter weather interfering with transporter and disposal site scheduling. While this is understandable, such delays should be anticipated during the winter and scheduling should allow for them.

Southwest District Office
7 East Fourth Street, Dayton, Ohio 45402-2086

Richard F. Celeste, Governor
Robert H. Maynard, Director

3. During times when hazardous waste is being physically handled in the storage area, the employee handling it must have immediate access to an emergency communication device or a second employee must be posted to obtain assistance if an emergency situation arises (OAC 3745-65-34).

4. The Contingency Plan for your facility should be modified to include the following:

   a. More detail is needed to specify actions to be taken by personnel in the event of an emergency incident.

   b. Arrangements or agreements with local or state emergency response authorities should be listed. This is in addition to documenting submittal of your contingency plan to those authorities.

   c. The list of emergency equipment, it's location and capabilities is too general. All items of emergency equipment must be listed, its exact location must be specified, a physical description must be provided and the capabilities of the equipment must be indicated.

   d. The emergency evacuation plan must specify the signal to be used to indicate an all clear condition.

   e. A copy of your Contingency Plan must be submitted to the local hospital in addition to the local police and fire departments.

   f. The plan must list the types of hazardous waste, the maximum inventory expected by type and the primary and secondary hazards associated with each waste type.

   g. The plan should include a topographic map showing the facility, access routes, utility installations, topographic features including streams and drainage ditches and adjacent land uses.

   h. Brief job descriptions of the emergency coordinators must be included and must show familiarity with all aspects of the wastes and waste handling processes used and must be consistent with the responsibility and authority required to implement the plan in an actual emergency.

i. The list of emergency coordinators must include effective dates and times of that capacity and must indicate a provision for ensuring the availability of an emergency coordinator at all times i.e.3, on call weekends and evenings on a rotating basis, etc.).

j. In addition to the U.S. EPA Regional Administrator, copies of the written incident report must be sent to the Director of the Ohio EPA. Addresses to which the reports are to be sent should be included in the plan.

k. The plan must describe procedures and clearly defined decision points for stopping operations during an emergency situation.

l. The plan must contain provisions for the decontamination and renovation of all contaminated process equipment and emergency equipment prior to resuming operations.

m. The Plan must be revised in response to personnel changes. I assume Mr. Robinson is an Emergency Coordinator but he is not listed.

I have enclosed a blank contingency plan review checklist for use in revising your plan.

OAC 3745-50 thru 56 contain the Rules requiring and specifying the contents of a Contingency Plan.

5. The hazardous waste container storage area weekly inspection form must be modified to provide spaces for indicating the time of the inspection and the date and nature of any remedial action (OAC 3745-65-15).

A form must be developed for inspection of loading/unloading areas daily when used and for conducting daily tank level and freeboard inspections as well as tank construction material inspections. (OAC 3745-65-15).

The following schedule is established for Carboline Company to submit proof of correction of the violations cited here-in.

1. Items 2,3 and 5 within 15 days of the date of this letter.

2. Item 4 within 30 days of the date of this letter.

3. Item 1 within 45 days of the date of this letter.

I will gladly meet with you and/or Mr. Robinson if you feel that I may be of assistance in further explaining these requirements.

Sincerely,

Jeff G. Hines
Hazardous Materials Management Section

JGH/dkp

Enclosures

cc: Ms. Paula Cotter, OEPA-DHMM/CO
cc: Mr. Paul Robinson, Plant Engineer/Carboline

February 22, 1984 10:00 a.m.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

withdrawal requested
HMFAB # 05-29-0573

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OHD030963615

Facility: Carbolene Address: 125 Fairground Road City: Xenia

State: Ohio Zip Code: 45385 County: Greene Telephone: (513) 372-3511

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	Paul Robinson	Plant Engineer	(513) 372-3511
2.			
3.			

INSPECTOR(S)

1.	Jeff Hynes		(513) 461-4670
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☑ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- ☐ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure
- ☐ Containers S01
- ☐ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment
- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80
- ☐ Chemical/Physical/Biological T04
- ☐ Groundwater Monitoring
- ☐ Post-Closure

Revised 9/15/82

OhioEPA

Re: Greene County
Hazardous Material Management
Carboline Company
Generator
OHD 030963615

Mr. Michael Hasser, Plant Manager
Carboline Company
125 Fairground Road
Xenia, Ohio 45385

March 11, 1983

Dear Mr. Hasser:

On February 28, 1983, an inspection of Carboline Company-Xenia was conducted to determine compliance status with the Hazardous Waste and Consolidated Permit Regulations (May 19, 1980 Federal Register) and the Hazardous Waste Rules of the Ohio EPA (OAC 3745-50 thru 69). At that time I met with Mr. Paul Robinson, Plant Engineer, to review the paperwork requirements and to tour those portions of your facility which are involved in hazardous waste management.

A copy of the inspection form is enclosed for your review.

At the time of the inspection, Carboline Company-Xenia was in substantial compliance with the Generator requirements of the Federal and State regulations.

Sincerely,

Jeff G. Hines
Hazardous Materials Management Section

JGH/dkp

cc: Ms. Paula Cotter, DHMM/Ohio EPA-CO
cc: Mr. Ken Westlake, U.S. EPA/Region V

Southwest District Office
7 East Fourth Street, Dayton, Ohio 45402-2086 (513) 461-4670

Richard F. Celeste, Governor
Robert H. Maynard, Director

Febru 1 28, 1983; 1:00 p.m.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 05-29-0573

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OHD 630963615

Facility: Carboline Company Address: 125 Fairground Road City: Xenia

State: Ohio Zip Code: 45385 County: Greene Telephone: (513) 372-3511

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	Paul Robinson	Plant Engineer	(513) 372-3511
2.			
3.			

INSPECTOR(S)

1.	Jeff Hines	Environmental Engineer 2	(513) 461-4670
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☑ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- ☐ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure
- ☐ Containers S01
- ☐ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment
- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80
- ☐ Chemical/Physical/ Biological T04
- ☐ Groundwater Monitoring
- ☐ Post-Closure

Revised 9/15/82

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	√			
2. If "yes", is it complete and accurate?	√			
3. Has the facility submitted a Part B?		√		

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

The facility operated under an HWFAB Ohio Storage permit, but have since modified operations and management procedure to act only as a Generator. Appropriate partial closure documentation has been submitted to OEPA-CO and U.S. EPA - Region V.

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	✓			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?		✓		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).		✓		
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	✓			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	✓			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	✓			

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.			✓	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	✓			
b) The date that accumulation began is clearly marked on each container.	✓			
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	✓			
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	✓			

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)		√		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	√			
b) Access to telephone, radio or other device for summoning emergency assistance.	√			
c) Portable fire control equipment.	√			
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	√			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	√			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	√			
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	√			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)	√			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)			√	

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	√			
b) Arrangements or agreements with local or state emergency authorities.	√			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	√			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	√			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))	√			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)	√			
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)	√			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)	√			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.			√	

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	√			
b) In good physical condition (265.171)	√			
c) Compatible with the wastes stored in them (265.172)	√			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	√			
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	√			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	√			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	√			
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c)	√			

RCRA INTERIM STATUS INSPECTION FORM

Subpart J: Storage in Tanks

	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d).			✓	
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).			✓	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).			✓	
4. Weekly inspections are made of all tank construction materials and containment structures (265.194).		✓		done but not documented.
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)				
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			✓	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			✓	
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a))				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).		✓		

	Yes	No	N/A	Remark #
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	✓			
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)			✓	
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b). (265.199)	✓			
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197).			✓	

OhioEPA

Re: Greene County
Hazardous Materials Management
Carboline
TSD
OHD 030963615/05-29-0573

Mr. Michael D. Hasser, Plant Manager
Carboline Company
125 Fairground Road
Xenia, Ohio 45385

August 9, 1982

Dear Mr. Hasser:

A reinspection of your facility was conducted on August 2, 1982 at 9:00 a.m. to determine if sufficient corrective measures had been taken, in accordance with my inspection report of April 13, 1982 and reinspection report of July 1, 1982, to achieve compliance with the Hazardous Waste and Consolidated Permit Regulations (May 19, 1980 Federal Register) and the Hazardous Waste Rules of the Ohio EPA (OAC 3745-50 thru 58). At that time, Mr. Don Marshall, Ohio EPA Southwest District Regulated Site Group Chief, and I met with Mr. Kenneth Johnson to review your hazardous waste management program.

Our reinspection concludes that Carboline Company - Xenia is currently in substantial compliance with the applicable portions of the Federal and State regulations previously referenced.

We did request that sampling methods and analytical tehcniques be listed in the Waste Analysis Plan. Mr. Johnson indicated that he would request that information from your contract laboratory for inclusion in the plan.

Mr. Johnson informed us that Carboline Company - Xenia intends to request a change in status from a permitted treatment and storage facility to only a generating facility. Such a change should be requested in writing, including hazardous waste management practices adopted to insure compliance with generator requirements, and submission of your facility closure plan, revised to show phase implementation dates. If accepted, closure of the storage area may be carried out according to the plan, and must be followed with certification of closure by a registered Professional Engineer. Copies of the request for change of status and the closure plan must be sent to:

1. Administrator
   U.S. EPA Region V
   230 South Dearborn Street
   Chicago, Illinois 60604

State of Ohio Environmental Protection Agency
Southwest District Office
7 East Fourth Street. Dayton. Ohio 45402-2086 (513) 461-4670

James A. Rhodes, Governor
Wayne S. Nichols, Director

2. Ohio Environmental Protection Agency
   Division of Hazardous Materials Management
   Permits and Manifest Records Section
   361 East Broad Street
   Columbus, Ohio 43215

   Attention: Tom Crepeau

3. Ohio EPA Southwest District Office
   7 East Fourth Street
   Dayton, Ohio 45402

   Attention: Jeff Hines

If a change of status is approved and closure of the storage area is completed, hazardous waste management must be conducted in compliance with Sections 262 and 3745-52 of the Federal and State regulations respectively. These sections pertain to generator activity.

As a treatment and storage facility, recent Federal regulations required implementation of a financial assurance mechanism by July 6, 1982 and liability insurance by July 15, 1982. Mr. Johnson was not informed of corporate activity to assure compliance with these regulations. This matter should be addressed immediately.

Please feel free to contact me if I may be of assistance to you. Thank you for your cooperation in these matters.

Sincerely,

Jeff G. Hines
Hazardous Materials Management Section

JGH/dk!

cc: Mr. Ken Johnson, Safety and Training Manager, Carboline-Xenia
cc: Mr. Dale Boyer, Plant Services Manager, Carboline-Xenia
cc: Mr. William Stewart, Manager Corporate Engineering, Carboline-St. Louis
cc: Mr. Bob Fragale, Hazardous Waste Facilities Approval Board, Columbus
cc: Ms. Paula Cotter, Division of Hazardous Materials Management, Columbus
cc: Ms. Kathy Homer, U.S. EPA/Region V

Re: Greene County
Hazardous Materials Management
Carboline Company
TSDF
OHD 030963615/05-29-0573

Michael D. Hasser, Plant Manager
Carboline Company
125 Fairground Road
Xenia, Ohio 45385

July 1, 1982

Dear Mr. Hasser:

A reinspection of your facility was conducted on June 15, 1982 at 9:00 a.m. to determine if sufficient corrective measures had been taken, in accordance with my inspection report of April 13, 1982, to achieve compliance with the Hazardous Waste and Consolidated Permit Regulations (May 19, 1980 Federal Register) and the Hazardous Waste Rules of the Ohio EPA (OAC 3745-50 thru 58).

I will address the status of the violations in the order that they were listed in my April 13, 1982 letter to you.

1. A written waste analysis plan and records of detailed chemical analyses as required by Sections 265.13 and 3745-55-13 of the Federal and State Regulations respectively were not available at the reinspection. I was informed that a consultant had been retained to prepare the plan.

2. Records of the Personnel Training Program required by Sections 265.16 and 3745-55-16 of the Federal and State Regulations respectively were available at the time of the reinspection. According to the records, the only training provided was conducted on August 27, 1980. The records show that the training consisted of a Sun Company RCRA slide/tape show. These records indicate a violation of the previously referenced regulations which also require annual training program refresher courses, training new employees within six months, training in safe equipment operating and emergency response procedures specific to the facility.

3. Adequate aisle space had not been maintained between the stacks of solvent drums remaining in the storage area as required by Sections 265.35 and 3745-55-35 of the Federal and State Regulations respectively.

Aisle space between stacks of drums must be adequate to allow inspection of the drums for leaks and to permit unobstructed movement of emergency or spill control equipment.

4. The drummed and containerized wastes refered to in item 4 of the inspection report letter had been removed by the time of the reinspection and therefore the violation was eliminated.

5. Again, the containers refered to in item 5 of the inspection report letter had been removed by the time of the inspection and the violation was therefore eliminated. The solvent drums appeared to be closed and in good condition.

6. All ignitable and reactive wastes stored within 50 feet of the property line and in areas not designated to be hazardous waste storage areas had been removed by the time of the inspection. Compliance with the distance requirement was achieved.

7. The written Contingency Plan for Carbboline Company (Xenia) now contains arrangements/agreements with local emergency authorities. It has not been modified to include the home addresses of the persons listed as emergency coordinators. Further, the existing evacuation plan for the facility has not been included in the contingency plan.

8. There is no written operating record at the facility. Sections 265.73 and 3745-55-73 of the Federal and State regulations respectively specify the content of the operating record. Much of the information is available at the facility, but it has not been pulled together and made available as an operating record. I was informed that Mr. Mike Tankersley has been given the responsibility for compiling the written operating record.

9. A written closure plan and closure cost estimate are now available at the facility. Compliance with this requirement has been achieved.

In my original inspection letter of April 13, 1982, I requested that all paperwork violations listed (items 1,2,7,8 and 9) be corrected within thirty days of your receipt of that letter and forwarded to my attention for review. I find it disturbing that I received no response at the end of the thirty day period and at the end of sixty days, a reinspection revealed that violations still existed in four of the five noted items. The original inspection report noted four physical management violations (items 3,4,5 and 6). At the time of the reinspection, three of the four noted violations had been corrected by having several hundred drums and containers of hazardous waste removed from the site for proper disposal. Adequate aisle space has not been provided in the remaining stacks of waste solvent drums. Although removal of the majority of the hazardous waste from your facility has achieved compliance with most of the noted physical management violations, no demonstration of continued compliance through proper physical management of wastes in the storage area has been indicated.

A final reinspection is here-in scheduled for August 2, 1982 at 9:00a.m. At that time, Mr. Don Marshall, Regulated Site Group Chief, and I will review your total hazardous materials management program. If Carboline Company (Xenia) is found at that time not to be in substantial compliance with all pertinent requirements of the Federal and State hazardous waste regulations (May 19,1980 Federal Register and OAC 3745-50 thru 58), our legal staff will be consulted regarding appropriate subsequent enforcement.

Please contact me immediately if you have any questions regarding this matter or if you feel that I have misinterpreted any aspect of your hazardous materials management program.

Sincerely,

Jeffrey G. Hines
Hazardous Materials Management Section

JGH/mmg

cc: Mr. Ken Johnson, Safety and Training Manager/Carboline, Xenia
cc: Mr. Dale Boyer, Plant Services Manager/Carboline, Xenia
cc: Mr. William J. Stewart, Manager Corporate Engineering/Carboline, St. Louis
cc: Mr. Bob Fragale, HWFAB/Columbus
cc: Ms. Paula Cotter, DHMM/Columbus
cc: Ms. Kathy Homer, U.S. EPA/Retion V

KINTECH SERVICES, INC.
2900 VERNON PLACE
CINCINNATI, OHIO
45219

NEW YORK
CHICAGO
DENVER
BASEL
LOS ANGELES

513 281-2900
TLX 21-4303

December 7, 1982

Mr. W. Stewart
Manager Corporate Engineering
Carboline Company
350 Hanley Industrial Court
St. Louis, Missouri 63144

Subject: Hazardous Waste Facility Inspection

Dear Mr. Stewart:

I visited the Carboline Corporation plant in Xenia, Ohio, on December 2, 1982, to inspect the facilities stated by your Mr. Paul Robinson to be for disposal of drummed hazardous waste.

I examined an area approximately 150 feet by 175 feet located north of Raw Materials Warehouse No. 8.

I saw an agitated 7,000 gallon rectangular holding tank in the aforementioned area. The tank was full of liquid material. The analysis was not stated. Twenty-one empty 55 gallon drums were situated adjacent to the 7,000 gallon tank. Located nearby were nineteen filled 55 gallon drums bearing hazardous waste labels dated December 1, 1982. The above describes the situation existing at the site mentioned above.

I trust that this information will be of assistance to you.

Very truly yours,

KINTECH SERVICES, INC.

Joseph Reis, Jr.
Professional Engineer
State of Ohio
Registration No. E-046087

JR
hlc/abg

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD 030963615

Facility: CARBOLINE COMPANY Address: 125 FAIRGROUND ROAD City: XENIA

State: OHIO Zip Code: 45385 County: GREENE Telephone: (513) 372-3511

Facility Operator: MICHAEL D. HASSER Title: PLANT MANAGER Telephone: (513) 372-3511

Facility Owner: CARBOLINE COMPANY Address: 350 HANLEY INDUSTRIAL COURT

City: ST. LOUIS State: MISSOURI Zip Code: 63144 Telephone: (314) 644-1000

Type of Ownership: ✓ Private ____ Government State HWFAB No. 05-29-0573

Date of Inspection: APRIL 5, 1982 Time of Inspection: (Start) 1:35 p.m. (Finish) 2:25 p.m.

Advance Notification? ___ No ✓ Yes: ____

Weather Conditions: cold, cloudy

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	KEN JOHNSON	SAFETY AND TRAINING MANAGER	(513) 372-3511
2.	DALE BOYER	PLANT SERVICES MANAGER	(513) 372-3511
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	JEFF G. HINES	ENVIRONMENTAL SCIENTIST 2	(513) 461-4670
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ✓ Generation B. ✓ Storage C. ____ Treatment
   D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

   a) Listed Wastes: K078, K079, K081, F002, F003, F005

   K... solvent cleaning wastes and water cleaning wastes from paint manufacturing and wastewater treatment sludges;

   F... spent halogenated and non-halogenated solvents.

   b) Non-Listed Wastes: ____ I (D001) ____ C (D002) ____ R (D003) ____ T (D000)

3. Has this facility submitted a Part A Permit Application? ✓ Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

   ✓ Yes, See Remark # 1 ____ No

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ___√___ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ___√___ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

PAINT MANUFACTURING

REMARKS, PART 1. (GENERAL INFORMATION)

1. Product paint with expired shelf-life is returned from warehouse facilities off-site to the Xenia facility for storage prior to arranging disposal (if it is determined that it can not be "reworked").

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	√			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?		√		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.		√		
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	√			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	√			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	√			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	√			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	√			

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	√			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	√			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	√			
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	√			1
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	√			1
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.			√	
8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:			√	
a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.			√	

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.	—	—	√	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	—	—	√	—
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	—	—	√	—
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	√	—
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	√	—
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	—	—	√	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	—	—	√	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	√	—	—	2
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	—	√	—	2

	Yes	No	N/A	Remark #
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.	√			3

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

1. Federal annual reporting requirement suspended; first Ohio annual report recently completed.

2. A personnel training program was conducted by the corporate headquarters staff (from St. Louis). No training records were available for review at the facility. It was indicated that the records may be at the corporate office.

3. Not necessary to date however they are aware of the requirement.

RCRA INTERIM STATUS INSPECTION FORM

PART 3. TRANSPORTER REQUIREMENTS NOT APPLICABLE

	Yes	No	N/A	Remark #
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).				
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.				
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.				
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).				
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).				
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.				
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).				
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?				
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).				

	Yes	No	N/A	Remark #
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?				
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?				
9. Does the transporter store hazardous wastes temporarily while they are in transit?				
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)				

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?				
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?				

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.		✓		1
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).		✓		1
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	✓			2
b) Artificial or natural barrier completely surrounding the active portion of the facility.	✓			
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	✓			
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	✓			

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	√			
a) Inspect emergency equipment.	√			
b) Inspect monitoring equipment.			√	
c) Inspect security, alarm and communications devices.	√			
d) Inspect process equipment (pipes, pumps, etc.).	√			
e) Inspect containment structures (dikes, curbs, etc.).			√	
f) Inspect facility for structural malfunctions (roof, floor, etc.).	√			
g) Inspect hazardous waste handling/loading areas each day used.	√			
h) Record of any malfunctions due to equipment or operator errors.	√			
i) Record of any hazardous waste discharges.	√			
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	√			
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.		√		3
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	√			

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.	√			
b) Physical separation of incompatible waste materials.	√			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	√			
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	√			

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		√		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	√			
a) Internal alarm system	√			
b) Access to telephone, radio or other device for summoning emergency assistance.	√			
c) Portable fire control equipment.	√			
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	√			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	√			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	√			

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).		✓		4
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).			✓	

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	✓			
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.		✓		
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.		✓		5
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).		✓		
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	✓			

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	✓			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.			✓	

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:		✓		
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).		✓		
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).		✓		
c) The estimated (or actual) weight, volume or density of the waste material(s).		✓		
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).		✓		

	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.	___	✓	___	___
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	___	___	✓	___
g) Records of any waste analyses and trial tests required to be performed.	___	___	✓	___
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	___	___	✓	___
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	___	___	✓	___
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	___	___	✓	___
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	___	___	✓	___

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	___	___	✓	___

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	___	___	✓	___

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	___	___	√	___
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	___	___	√	___
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	___	___	√	___
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/ Director within 15 days.	___	___	√	___

Subpart F: Groundwater Monitoring NOT APPLICABLE

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	___	___	___	___

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	✓			
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.			✓	
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.			✓	
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).			✓	
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).			✓	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES. NOT APPLICABLE

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.				
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.				
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.				
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.				

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.				
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.				

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)		✓		6
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).			✓	
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.			✓	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.			✓	

	Yes	No	N/A	Remark #
9. ~~The property owner~~ has attached a notation to the property deed or other instrument which ~~will notify any potential~~ purchaser that the property has been used to manage hazardous waste and ~~future use of the property~~ is restricted under Sections 265.117(c) and 3745-56-08-C as required ~~in Sections 265.120~~ and 3745-56-10.				

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).		√		6

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

1. There is no waste analysis plan on file at the facility. There are no waste chemical analyses available for review at the facility.

2. Surveillance 16 hours/day 5 days/week and 8 hours/day on week-ends. Drive through spot checks by Greene County Sheriff's Department.

3. Training records are not maintained at the Xenia facility. They may be on file in St. Louis since corporate office staff provided the training.

4. There is no aisle space in the hazardous waste storage area; drums are tightly stacked.

5. Addresses are not listed.

6. The closure plan is not available at the Xenia facility. It is on file at the corporate headquarters office in St. Louis.

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).		√		1
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	√			2

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).		√		3
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	√			

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	√			

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.			√	
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).			√	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	√			
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	√			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).			√	
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			√	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			√	

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	√			
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.			√	
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	√			
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	√			
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	√			
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).			√	

Subpart K: Surface Impoundments NOT APPLICABLE

1. ~~The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).~~				
2. Earthen structural containment systems are equipped with ~~protective~~ cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).				

	Yes	No	N/A	Remark #
3. The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented (Sections 265.226 and 3745-57-07).				
4. Has the facility ever recorded an unplanned release of hazardous waste from the Surface Impoundment(s)? (Sections 265.15 and 3745-55-15).				
5. Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes by one or both of the following methods (265.225 and 3745-57-06).				
a) A complete waste analysis plus bench scale or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.				
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.				
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Sections 265.229 and 3745-57-10)				
a) The waste is treated immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.				
7. Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (Sections 265.230 and 3745-57-11).				

	Yes	No	N/A	Remark #
8. As required by Subpart F, Sections 265.90 and 3745-55-90 (Groundwater Monitoring) the facility has implemented a groundwater monitoring program capable of determining the impact of the Surface Impoundment(s) on the quality of the groundwater in the uppermost aquifer underlying the facility.	___	___	___	_____
9. In lieu of a groundwater monitoring program, the operator has a written demonstration that there is a low potential for migration of hazardous waste or constituents via ground or surface waters which has been certified in writing by a qualified geologist in compliance with Sections 265.90(c) and 3745-55-90-C.	___	___	___	_____
10. Upon closure of the Surface Impoundment, the operator intends to remove all wastes, residues, liners and any contaminated soil as required by Sections 265.228 and 3745-57-09 in order to exempt the Surface Impoundment from further regulation under Section 265.	___	___	___	_____

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS. (SECTIONS 265.228 AND 3745-57-09).

Subpart L: Storage in Waste Piles NOT APPLICABLE

	Yes	No	N/A	Remark #
1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal (Sections 265.251 and 3745-57-31).	___	___	___	_____
2. If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Sections 265.253 and 3745-57-33).	___	___	___	_____
a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.	___	___	___	_____

	Yes	No	N/A	Remark #
b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.				
c) No liquids or wastes containing free liquids are placed in the pile.				
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Sections 265.252 and 3745-57-32).				
4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met (Sections 265.256 and 3745-57-36).				
a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive and was done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.				
b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.				
5. Incompatible materials are never placed in the same Waste Pile or near areas containing residues of a incompatible material unless it is done in compliance with the safety requirements of Section 265.17(b) (Sections 265.257(a)(c) and 3745-57-37-A-C.				
6. Piles of hazardous waste are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.257(b) and 3745-57-37-B).				

Subpart M: Land Treatment NOT APPLICABLE

	Yes	No	N/A	Remark #
1. Is treated hazardous waste capable of biological or chemical degradation?	___	___	___	_____
2. Are run-off and run-on diverted from the facility or collected? (Effective Date: November 19, 1981)?	___	___	___	_____
3. Is waste analyzed according to 265.273?	___	___	___	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	___	___	___	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	___	___	___	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	___	___	___	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	___	___	___	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	___	___	___	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies).	___	___	___	_____

Subpart N: Landfills NOT APPLICABLE

1. General Operating Requirements. Does the facility provide the following:

NOTE: 1a, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
a) Diversion of run-on away from active portions of the fill?	___	___	___	_____

	Yes	No	N/A	Remark #
b) Collection of run-off from active portions of the fill?				
c) Is collected run off treated?				
d) Control of wind dispersal of hazardous waste?				
2. Surveying and Recordkeeping. Does the operating record include:				
a) A map showing the exact location and dimensions of each cell?				
b) The contents of each cell and the location of each hazardous waste type within each cell?				
3. Closure and Post-Closure				
a) Is the Closure Plan available for inspection by May 19, 1981?				
b) Has this plan been submitted to the Regional Administrator?				
c) Has Closure begun?				
d) Is Closure cost estimate available by May 19, 1981?				
4. Special requirements for ignitable or reactive waste				
a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE SEE TREATMENT REQUIREMENTS . IF NOT, THE PROVISIONS OF 40 CFR 265.17(b) APPLY.

	Yes	No	N/A	Remark #
5) Special Requirements for Incompatible Wastes.				
a) Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply.				

	Yes	No	N/A	Remark #
6. Special requirements for liquid waste (effective November 19, 1981)				
a) Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
b) Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
c) Does the landfill have a functional leachate collection system?	___	___	___	_____
d) Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
7. Special requirements for Containers (effective November 19, 1981)				
a) Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

Subparts O and P: Incineration and Thermal Treatment

NOT APPLICABLE

1. Determination of Steady State

a) Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

b) Components and steady state condition:

NOTE: INDICATE WHETHER OR NOT THIS COMPONENT WAS AT STEADY STATE PRIOR TO ADDING WASTE.

Component	Yes	No	N/A	Remark #
1. _____	___	___	___	_____
2. _____	___	___	___	_____
3. _____	___	___	___	_____
4. _____	___	___	___	_____

2. Waste Analysis

NOTE: THE FOLLOWING ARE MINIMUM REQUIREMENTS, FOR WASTES NOT PREVIOUSLY BURNED/TREATED:

	Yes	No	N/A	Remark #
a) Required analyses; has an analysis been performed for the heating value?	___	___	___	_____
b) Halogen content?	___	___	___	_____
c) Sulfur content?	___	___	___	_____
d) Has documented or written data been substituted for analysis of either:				
1. Lead?	___	___	___	_____
2. Mercury?	___	___	___	_____

e) List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	Remark #
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____
6. _____	_____
7. _____	_____

3. Monitoring and Inspections

	Yes	No	N/A	Remark #
a) Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
b) Is steady state maintained or corrections attempted?	___	___	___	_____
c) Is tack plume observed at least hourly for normal color and opacity?	___	___	___	_____
d) Did any stack observations made by owner or operator show a plume different than normal?	___	___	___	_____
e) If yes to "d" above, were corrections made to return emissions to normal appearance?	___	___	___	_____

NOTE: SPECIFY IN REMARKS FOR WHAT PERIOD OF TIME THIS WAS CHECKED.

f) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
g) Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

4. Open Burning

NOTE: ONLY COMPLETE THIS PART IF THE FACILITY OPEN BURNS HAZARDOUS WASTE.

a) Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
b) If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft.
101 to 1,000.....	380 m	1,250 ft.
1,001 to 10,000.....	530 m	1,730 ft.
10,001 to 30,000.....	690 m	2,260 ft.

Subpart Q: Chemical, Physical and Biological Treatment NOT APPLICABLE

	Yes	No	N/A	Remark #
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	_____
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible waste treated? (If yes, 265.17(b) applies.)	___	___	___	_____

NOTE: EPA HAS TEMPORARILY SUSPENDED THE APPLICABILITY OF THE REQUIREMENTS OF THE HAZARDOUS WASTE REGULATIONS IN 40 CFR PARTS 122, 264 AND 265 TO OWNERS AND OPERATORS OF (1) WASTEWATER TREATMENT TANKS THAT RECEIVE, STORE, AND TREAT WASTEWATERS THAT ARE HAZARDOUS WASTE OR THAT GENERATE, STORE OR TREAT A WASTEWATER TREATMENT SLUDGE WHICH IS A HAZARDOUS WASTE WHERE SUCH WASTEWATERS ARE SUBJECT TO REGULATION UNDER SECTIONS 402 OR 307(b) OF THE CLEAN WATER ACT (33 U.S.C. 1251 ET SEQ.) AND (2) NEUTRALIZATION TANKS, TRANSPORT VEHICLES, VESSELS, OR CONTAINERS WHICH NEUTRALIZE WASTES WHICH ARE HAZARDOUS ONLY BECAUSE THEY EXHIBIT THE CORROSIVITY CHARACTERISTIC UNDER 40 CFR 261.22 OR ARE LISTED AS HAZARDOUS WASTES IN SUBPART D OF 40 CFR PART 261 ONLY FOR THIS REASON.

PART 5 : TREATMENT/STORAGE/DISPOSAL ; REMARKS

#1. Many drums were observed to have missing bungs & loose fitting lids.

#2. Daily inspections of the drum storage area are conducted, however the drums are so crowded that detecting leaks, etc. is impossible in the center of the storage yard.

#3. There are many waste drums stored immediately adjacent to the property line..

OhioEPA

Re: Greene County
Hazardous Materials Management
Carboline Company
OHD030963615/05-29-0573

Mr. Michael D. Hasser, Plant Manager
Carboline Company
125 Fairground Road
Xenia, Ohio 45385

Dear Mr. Hasser:

On April 5, 1982, an inspection of your facility was conducted to determine compliance with the applicable portions of the Hazardous Waste and Consolidated Permit Regulations and the Hazardous Waste Rules of the EPA (May 19, 1980 Federal Register and OAC 3745-50 thru 58 respectively). At that time I met with Mr. Kenneth Johnson, Safety and Training Manager, and Mr. Dale Boyer, Plant Services Manager, to discuss your Hazardous Waste Management program and tour your hazardous waste storage area.

A copy of the inspection form is enclosed for your review.

The inspection revealed the following problem areas:

1. Carboline Company (Xenia) does not have on file a written waste analysis plan or records of detailed chemical analyses as required by Sections 265.13 and 3745-55-13 of the May 19, 1980 Federal Register and the Ohio Administrative Code respectively.

2. Records of the Personnel Training Program as required by Sections 265.16 and 3745-55-16 of the Federal and State regulations respectively are not maintained at your facility.

3. Adequate aisle space has not been maintained between stacks of drums in the drum storage area as required by Sections 265.35 and 3745-55-35 of the Federal and State regulations respectively.. Aisle space between stacks of drums must be adequate to allow inspection of the drums for leaks and to permit unobstructed movement of emergency or spill control equipment.

4. Drummed waste should not be stacked at a height exceeding three (3) drums. Each layer of drums must be supported by a sound pallet. Likewise, wastes stored in one (1) and five (5) gallon containers should be divided into single layers separated and supported by sound pallets.

5. All hazardous waste in the storage yard must be stored in closed containers which are in good condition. Several of the drums were observed to have missing bungs or loose-fitting lids.

6. Ignitable or reactive wastes may not be stored closer than 50 feet from the property line. There are apparently several hundred containers of ignitable waste adjacent to the fence (property line), an area not disignated to be a hazardous waste storage area. (Sections 365.176 and 3745-56 of the Federal and State regulations respectively).

7. The written contingency plan for Carboline Company (Xenia) does not contain the following as required by Sections 265.51 and 3745-55-51 of the Federal and State regulations:
   a. arrangements or agreements with local or state emergency authorties.
   b. home addresses of the persons listed as emergency coordinators.
   c. an evacuation plan for facility personnel.

8. There is no written operating record at the facility as required by Sections 265.73 and 3745-55-73 of the Federal and State regulations respectively.

9. There is no written Closure Plan on file at the facility as required by Sections 265.112 and 3745-56-13 of the Federal and State regulations respectively. Contents of the plan could therefore not be reviewed for complaince determination.

Remedial actions necessitated by the above-referenced violations include the following:

1. Items 1, 2, 7, 8 and 9 above are all paper-work requirements and Mr. Johnson and Mr. Boyer indicated that at least some aspects of these requirements might be on file at the head-quarters office in St. Louis. It will be necessary for

Carboline Company (Xenia) to obtain the available documents from St. Louis, to modify existing documents where required, and to cause the creation of currently non-existing required documents within 30 days of your receipt of this letter. Copies of all required documents sited in items 1, 2, 7, 8 and 9 above should be forwarded to my attention at the end of the 30 day period for review.

2. Items 3, 4, 5 and 6 above are all physical management aspects of your hazardous waste storage area. Within 60 days of your receipt of this letter, all hazardous ignitable or reactive waste must be removed from any area not designated as hazardous waste storage on your original Part A application, including any area closer than 50 feet from the property line. Also within the same time, adequate aisle space must be provided in the drum storage area, all drums must be examined to insure that all bungs are in place, all lids are secure and the drums are in satisfactory condition. Additionally all one and five gallon containers must be stacked as described in item 4. A reinspection of your facility is herein scheduled for June 15, 1982, at 9:00 a.m. to determine if adequate remedial actions have been taken to achieve correction of the "physical management" deficiencies outlined in this report.

During the inspection, we discussed the status of solvent recycling in the permit exemption classification. The solvent recycling program conducted for Carboline Company by Solvent Resource Recovery is not exempt from permit requirements as it is currently handled. I will gladly discuss the recycling exemption with you or your staff in the future if you so desire.

If you feel that I have misinterpreted any aspect of your hazardous waste management program or if I may be of assistance to you in any way, please contact me immediately.

Sincerely,

Jeff G. Hines
Hazardous Materials Managment Section

JGH/dkp

cc: Mr. Ken Johnson, Safety and Training Manager/Carboline (Xenia)
cc: Mr. Dale Boyer, Plant Services Manager/Carboline (Xenia)
cc: Mr. William J. Stewart, Manager, Corporate Engineering/Carboline (St. Louis)
cc: Mr. Bob Fragale, HWFAB/CO
cc: Ms. Paula Cotter, DHMM/CO
cc: Ms. Kathy Homer, U.S. EPA/Region V

OhioEPA

RE: Application Number 81-HW-0573
Greene County

October 1, 1981

Mr. William J. Stewart
Manager, Corporate Engineering
Carboline Company
350 Hanley Industrial Court
St. Louis, Missouri 63144

Dear Mr. Stewart:

On September 25, 1981, Jeff Hines of the Ohio Environmental Protection Agency conducted an inspection of your facility as part of the Hazardous Waste facility permit review process. Your facility was represented by Dale Boyer.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/maf

cc: Kathleen Homer, U.S. EPA, Region V
Jeff Hines, SWDO

CERTIFIED MAIL

STATE IDENTIFICATION NUMBER
81-HW-0573

EPA IDENTIFICATION NUMBER
OHD030963615

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Carboline Company
(B) Street: 125 Fairgrounds Road
(C) City: Xenia (D) State: Ohio (E) Zip Code: 45385
(F) Phone: (513) 372-3511 (G) County: Greene

(H) Operator: same as above
(I) Street:
(J) City: (K) State: (L) Zip Code
(M) Phone: (N) County:

(O) Owner: Carboline Company
(P) Street: 350 Hanley Industrial Court
(Q) City: St. Louis (R) State: Missouri (S) Zip Code: 63144
(T) Phone: (314) 644-1000 (U) County:
(V) Date of Inspection: 9-25-81 (W) Time of Inspection (From) 1:50 p.m. (To) 3:40 p.m.

(X) Weather Conditions: warm, cloudy

(Y) Person(s) Interviewed	Title	Telephone
Dale Boyer	Plant Service Manager	(513) 372-3511 ext. 33

(Z) Inspection Participants	Agency/Title	Telephone
Jeff Hines	Ohio EPA/Env. Scientist	(513) 461-4670

(AA) Preparer Information

Name	Agency/Title	Telephone
Jeff Hines	Ohio EPA/Env. Scientist	(513) 461-4670

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

✓ A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	___	___	___	N.A.
2. Facility expansion?	___	___	___	N.A.
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	√	___	___	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	___	√	___	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	___	√	NA	
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	√	___	___	
2. Artificial or natural barrier around facility?	√	___	___	
3. Controlled entry?	√	___	___	
4. Danger sign(s) at entrance?	√	___	___	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	√	___	___	thru specific checklist
2. Records of operator error?	√	___	___	" " "
3. Records of discharges?	√	___	___	" " "

no malfunctions, operator error or discharges to date

*Not Inspected

GENERAL FACILITY STANDARDS Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	√			daily
5. Safety, emergency equipment?	√			
6. Security devices?	√			
7. Operating and structural devices?	√			
8. Inspection log?	√			
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	√			
2. Job descriptions?		√		
3. Description of training?	√			
4. Records of training?	√			
5. Have facility personnel received required training by 5-19-81?	√			
6. Do new personnel receive required training within six months?		√		
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	√			
2. No smoking signs?	√			
3. Separation and protection from ignition sources?	√			

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			
2. Telephone or 2-way radios at the scene of operations?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

Xenia City water; 1 hydrant and 2 risers for fire use.

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
2. Is emergency equipment maintained in operable conditions?	✓			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	✓			

*N Inspected

(E) Is there adequate aisle space for unobstructed movement?	✓			

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			Currently there is no separate Contingency Plan, however most required components are availat The Mgr. of Corporate Engineering will arrive from St. Louis on 9/30/81 to combine all require components into one docume
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		✓		training conducted on-site b Xenia Twp. Fire Dept. - familiar with plant. No plar given to fire dept., etc.
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?		✓		
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	✓			

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?		√		Available as separate components at facility but not at local emergency organizations.
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	√			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	√			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	√			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				N.A.

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?				N.A. receives no waste from off-site
2. Are records of past shipments retained for 3 years?				N.A.
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				N.A.

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?	✓			components not in one operating record.
2.	Does the operating record contain the following information:				
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?		✓		will start logging
c.	The location and quantity of each hazardous waste within the facility?		✓		will start logging
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				N/A.
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓			
f.	Reports detailing all incidents that required implementation of the Contingency Plan?				N/A. no implementation to date
g.	All closure and post closure costs as applicable? (Effective 5-19-81)		✓		

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?		✓		The headquarters in St. Louis did not interpret this as being applicable to them. They will now begin preparation.
2. Has this plan been submitted to the Regional Administrator		✓		
3. Has closure begun?		✓		
4. Is closure estimate available by May 19, 1981?		✓		
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				N.A.

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Carboline Company Date of Inspection: 9-25-81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?	✓			daily
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	✓			

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	✓			

J
TANKS

Facility Name: Carboline Company Date of Inspection: 9-25-81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				N.A.
3. Do continuous feed systems have a waste-feed cutoff?				N.A.
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				N.A. only one waste
5. Are required daily and weekly inspections done?	✓			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	✓			
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				N.A.

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 6500 gallons

Tank diameter: _____ feet 16' L x 6' W x 10' H

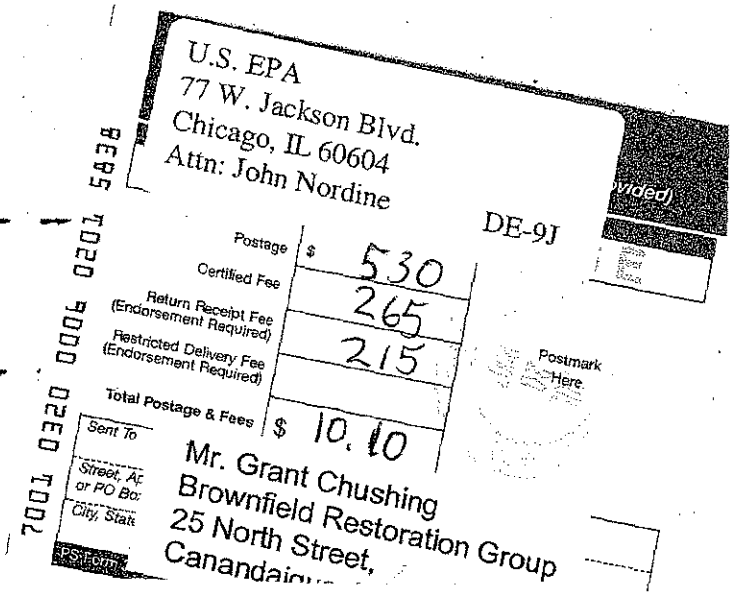
Distance of tank from property line ~200 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS N/A

Facility Name: _____ Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective covers?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				



L

WASTE PILES N/A

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of incompatible waste protected by barriers or distance from other waste?				

*Not Inspected

M

LAND TREATMENT N/A

Facility Name: _____ Date of Inspection: _____

1.	Is treated hazardous waste capable of biological or chemical degradation?	___	___	___
2.	Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?	___	___	___
3.	Is waste analyzed according to 265.273?	___	___	___
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	___	___	___
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	___	___	___
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	___	___	___
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	___	___	___
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	___	___	___
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies)	___	___	___

N
LANDFILLS N/A

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	___	___	___	_____
**2. Collection of run-off from active portions of the fill?	___	___	___	_____
**3. Is collected run off treated?	___	___	___	_____
4. Control of wind dispersal of hazardous waste?	___	___	___	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	___	___	___	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	___	___	___	_____
2. Has this plan been submitted to the Regional Administrator?	___	___	___	_____
3. Has closure begun?	___	___	___	_____
4. Is closure cost estimate available by 5-19-81?	___	___	___	_____
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	___	___	___	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	___	___	___	_____
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
2. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
3. Does the landfill have a functional leachate collection system?	___	___	___	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

*Not Inspected

O and P
INCINERATION and THERMAL TREATMENT

N/A

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.	_____	___	___	___	_____
2.	_____	___	___	___	_____
3.	_____	___	___	___	_____
4.	_____	___	___	___	_____
5.	_____	___	___	___	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

	1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a.	Heating value	___	___	___	_____
b.	Halogen content	___	___	___	_____
c.	Sulfur content	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

1. List other parameters for which the waste is tested to enable owner or operator to establis steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

N/A

	Yes	No	NI*	Remarks
. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
. Is steady state maintained or corrections attempted?	___	___	___	_____
. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected
*Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

N/A

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	√	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	√	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	√	___	___	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	✓			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	✓			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required certification?	✓			
8. Required signatures?	✓			with two exceptions where transpo is disposer. Will call and requ signed copy.
(C) Does the owner or operator submit exception reports when needed?	✓			

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	✓			
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	✓			
(C) If required, are placards available to transporters of hazardous waste?	✓			

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation N/A

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	___	___	___	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	___	___	___	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	_____
c. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
d. Are required daily and weekly inspections done?	___	___	___	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	___	___	___	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	___	___	___	_____

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	√			
(B) Has the generator submitted Annual Reports and Exception Reports as required?				N/A

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E) N/A.

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?				

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263 N/A

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	___	___	___	_____

II. INTERNATIOINAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	___	___	___	_____
B. Are signed completed manifest(s) on file?	___	___	___	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	___	___	___	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

I outlined the violations with Mr. Boyer at the time of the inspection and again by telephone on 9-28-81. I am confident that the company is taking swift action to insure compliance (as evidenced by corporate executives arriving from St. Louis on 9-30-81 to address the violations). None of the violations appear to provide immediate threat to environment, health or safety.

Greene co.

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-HW-0573
OWNER - Carboline Company
FACILITY NAME - Carboline Company
FACILITY LOCATION - 125 Fairgrounds Road Xenia, Ohio 45385
FACILITY CONTACT - William J. Stewart Mgr. Corp. Eng. : PHONE NO. - 878/644-100
ISS INSPECTION DATE - 9-25-81

Page	COLUMN I Item No.			COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III	A	1	3745-55-12(A)	265.12 (A)			
			2					
		B	1	3745-55-13	265.13			
			2	3745-55-13	265.13	B		
			3	"	"			
		C	1	3745-55-14	265.14			
			2	"	"			
			3	"	"			
			4	"	"			
		D	1	3745-55-15	265.15			
			2	"	"			
			3	"	"			
4			4	"	"			
			5	"	"			
			6	"	"			
			7	"	"			
			8	"	"			
		E	1	3745-55-16	265.16			
			2	"	"	B		
			3	"	"			
			4	"	"			
			5	"	"			
			6	"	"	B		
		F	1	3745-55-17	265.17			
			2	"	"			
			3	"	"			
5	IV	A	1	3745-55-31	265.31			
		B	1	3745-55-32	265.32			
			2	"	"			
			3	"	"			
		C	1	3745-55-33	265.33			
			2	"	"			
		D	1	3745-55-34	265.34			
6		E		3795-55-35	265.35			
	V	A	1	3745-55-52	265.52		✓	

Page	Item No.			AC Reference	USEPA Refere.	See Code Following	Refer To ISS Remark	OEPA Use
		A	2	3745-55-52	265.52	B	✓	
			3	"	"	B		
			4	"	"			
			5	"	"			
7		B	1	3745-55-53	265.53	B	✓	
		C	1	3745-55-55	265.55			
			2	"	"			
			3	"	"			
		D	1	3745-55-56	265.56			
	VI	A	1	3745-55-71	265.71			
			2	"	"			
		B	1	3745-55-72	265.72			
8		C	1	3745-55-73	265.73		✓	
			2b	"	"	B	✓	
			c	"	"	B	✓	
			d	"	"			
			e	"	"			
			f	"	"			
			g	"	"	B		
9	VII	A	1	3745-56-03	265.112	B	✓	
			2	"	"			
			3	"	"			
			4	3745-56-32	265.142	B		
		B	1	3745-56-09	265.118			
	VIII	I	1	3745-56-51	265.171			
			2	3745-56-52	265.172			
			3	3745-56-53	265.173			
			4	"	"			
			5	3745-56-54	265.174			
			6	3745-56-56	265.176			
10			7	3745-56-57	265.177			
			8	"	"			
		J	1	3745-56-72	265-192			
			2	"	"			
			3	"	"			
			4	3745-56-73	265-193			
			5	3745-56-74	265.194			
			6	3745-56-78	265.198			
			7	3745-56-79	265.199			
11			8	3745-56-78	265.198			
		K	1	3745-57-03	265.222			
			2	3745-57-04	265.223			
			3	3745-57-06	265.225			
			4	3745-57-07	265.226			
			5	"	"			
			6	3745-57-10	265.229			
			7	3745-57-11	265.230			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12		L	1	3745-57-31	265.251			
			2	3745-57-32	265.252			
			3		265.258			
			4	3745-57-36	265.256			
			5	"	"			
			6	3745-57-37	265.257			
			7	3745-57-37	265.257			
13		M	1	3745-57-52	265.272			
			2	"	"			
			3	3745-57-53	265.273			
			4	3745-57-56	265.276			
			5	3745-57-58	265.278			
			6	3745-57-58	265.278			
			7	3745-57-59	265.279			
			8	3745-57-61	265.281			
			9	3745-57-62	265.282			
14	N	A	1	3745-57-72	265.302			
			2	"	"			
			3	"	"			
			4	"	"			
		B	1	3745-57-79	265.309			
			2	"	"			
		C	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.192			
		D	1	3745-57-82	265.312			
15				3745-55-17	265.17(b)			
		E	1	3745-57-83	265.313			
			2	3745-55-17	265.17(b)			
		F	1	3745-57-84	265.314			
			2	"	"			
			3	"	"			
			4	"	"			
		G	1	3745-57-85	265.315			
16	O&P							
	I	B	1	3745-58-33	265.373			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
	II	A	1a	3745-58-35	265.375			
			b	"	"			
			c	"	"			
17								
			2a	3745-58-35	265.375			
			b	"	"			
		B	1	"	"			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	O U
	III	A	1	3745-58-37	265.377			
		B	1	"	"			
		C	1	"	"			
		D	1	"	"			
		E	1	"	"			
		F	1	"	"			
		G	1	"	"			
18	IV	A	1	3745-58-42	265.382			
			2	"	"			
		0	1	3745-58-51	265.401			
			2	"	"			
19			3	3745-58-52	265.402			
			4	3745-58-53	265.403			
			5	3745-58-55	265.405			
			6	3745-58-56	265.406			
	IX I	(A)		3745-52-40	262.40			
		(B)	1	3745-52-21	262.21			
			2	"	"			
20			3	"	"			
			4	"	"			
			5	"	"			
			6	"	"			
			7	"	"			
			8	3745-52-42	262.42		✓	
		(C)		3745-52-42	262.42			
	2.	(A)		3745-52-30	262.30			
		(B)		3745-52-31	262.31			
		(C)		3745-52-33	262.33			
21	3		1	3745-52-34	262.34			
			2	"	"			
			3	3745-56-54	265.174			
			4a	3745-56-72	265.192			
			b	"	"			
			c	"	"			
			d	3745-56-74	265.184			
			e	3745-56-78	265.198			
			f	3745-56-79	265.199			
22	VI	A		3745-52-40	262.40			
		B		3745-52-41	262.41			
	VII		1a	3745-52-50	262.50			
			b	"	"			
			c	"	"			
			2	"	"			
23	X I			3745-53-22	263.22			
	II	A		3745-53-20	263.20			
		B		"	"			
	V	A		3745-53-10	263.10			
		B		3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the consideration for issuance of an Ohio Hazardous Waste Permit.

B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.

D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 5 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.

E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.

F. Inspection revealed non-compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.

G. NFPA's code requires that the tanks be located 50 feet from the property line.