DSWM LEC

Request EPA ID # FEB 09 1993

Hazardous Waste Notification

Tennessee Department of Health and Environment, Division of Solid Waste Management
Customs House - Fourth Floor, 701 Broadway, Nashville, Tennessee 37219-5403

NEW

1. Organization's full, legal name: Brad Ragan Tire and Appliance	EPA identification code: TND 987789716
2. Mailing address: 110 Villa Circle	City: Dickson; State abbrev.: TN; ZIP code: 37055
3 a. Physical location or address: Hgwy 70 Bypass	County name: Dickson
b. Latitude (degrees, minutes & seconds): Hwy 70 Byp	Longitude (degrees, minutes & seconds):
4. Owner name: Brad Ragan, Pres	Phone with area code: (704) 521-2174
5. Manager or operator name: Judy Jordan Mgr John Hargrove	Phone with area code: (615) 446-8061
6. Principal technical contact: See item 5 John Hargrove	Phone with area code: (615) 446-8061

7. Number of employees	Year operation began	SIC codes (Primary SIC first, etc.)	Job shop Yes No
		7534	

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	See item 5 Judy Jordan John Hargrove		615-446-8061
b.			
c.			
d.			

9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
R Ragan	Mgr. Sec	2-3-93

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
2-9-93	22		Yes (No)	Yes (No)	(Y)

12. Date closed	Date regulated	Date deregulated	Inspection frequency Annual (A), FY88+2n (1), FY89+2n (2).	

13. Comments

PH-2010A (SWM 11/87 Rev.)

Hazardous Waste Stream Report

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

NEW

1. Organization's full name at facility. Brad Ragan Tire and Appliance	EPA identification code TND 98778 9716
2. Waste name. Use standard name from regulations whenever possible. WASTE COMBUSTIBLE LIQUID, N.O.S. (Mineral Spirits)	Waste Stream number 01
3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY) — Frequency of generation: Continuous / Accidental/ One time / Various
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f).	EPA waste codes. (Primary first) D001, D018, D039 — SIC code for generating process. 7538

5. Physical form	Percent solid	Percent water	Vol. to wt. conversion (pounds per gallon)	If used for fuel, chlorine content	BTU per pound
Liquid, Other	0.5%	2.5%	6.71b/gl	PPM	/lb.

6. Generation rates. Supply all rates in kilograms. Monthly maximum	Annual average	Maximum amount stored on site	Maximum days stored
20 (kg)	96 8/440 (kg)	20 ø (kg)	ø 90

7. DOT shipping name	DOT hazard class	DOT ID code
Waste Combustible Liquid	N.O.S. (Mineral Spirits) PGIII 2	NA1993

8. Describe generation process.

DEGREASING AUTOMOTIVE PARTS

*** ANNUAL REPORT SECTION *** Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off site, also submit Annual Shipping Report for hazardous waste generators. For handling in a permitted facility, use "T", "S", or "D" codes from instructions. For other handling, use "R" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on site on first day of year (kg)	Amount on site on last day of year (kg)

	Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods		Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods
a				b			
c				d			

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

a. Reformulation/redesign of product . a( )
b. In process recycling. . . . . b( )
c. Equipment/technology modification . c( )
d. Substituting raw materials . . . . d( )
e. Improved operations. . . . . e( )
f. No effort. . . . . f( )
g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to the previous year.

a. Increased toxicity-a( ). b. decreased toxicity-b( ). c. No change-c( ).

Amount of Reduction (kg)

PH-2022(SWM 11/87 Rev.)

NEW

12. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic wastes, indicate PPM. % volume( ), % weight( ), PPM( )
	105°F		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. Petroleum Naphtha	80	99
b. Oil, Water & Solids	1	20
c.		
d.		
e.		

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

Recycled through fractional distillation

14. Describe storage, treatment, and disposal methods using codes in the instructions.

Location	Treatment codes	Storage codes	Disposal codes
On site:			
Off site:	T63	S02	

15. Identify transporters, TSDF operators and recyclers involved in handling this waste.

Name and address	EPA identification code
SAFETY KLEEN CORP	TSDR TND981474125
215 WHITSETT ROAD NASHVILLE TN 37210	TRANSPORTER ILD051060408

16. Certification: I certify that this information is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
R Olson	Mfg Dir	2-3-95

Below is for Department use only.

17. Date received (MMDDYY)	Complete?	Test results?	Reasonable?	Follow up	Initials
2-9-93	(Yes) No	Yes (No)	(Yes) No	Yes (No)	DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); and Mixed radiological wastes (R).

Status	Further Reporting
4	(Y) N

18. Comments.

BRAD RAGAN, INC.
4046 Stuart Andrew Blvd., Charlotte, NC 28217
A Subsidiary of The Goodyear Tire and Rubber Company
Phone 704-521-2174
Fax 704-521-2171

January 25, 1996

Tennessee Dept. Of Environment and Conservation
Division of Solid Waste Management
5th Floor, L & C Tower
401 Church Street
Nashville, TN 37243-1535

The attached hazardous waste data reflects a substantial change from prior years. Our stores are auto and tire service stores. Their only waste that might be classed as hazardous includes waste oil and antifreeze. By phone consultation with Mr. Dennis Woodson, I am advised that Tennessee no longer considers those products as hazardous. In any case, they are picked up for recycling.

We have also changed our parts cleaners to a "green" or non-solvent based product in the interest of both economy and environmental responsibility.

It is my understanding that we no longer have to submit these forms unless we resume some form of hazardous waste generation.

Sincerely,

R.D. Aigner
Brad Ragan, Inc.

RECEIVED
JAN 30 1996
Solid & Hazardous Waste

Conditionally Exempt Small Quantity Generators (CESQG). 1995 Annual Reports of Hazardous Waste Activities

Tennesseee Department of Environment and Conservation; Division of Solid Waste Management;
Fifth Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535

Although Conditionally Exempt Small Quantity Generators (CESQG) are not required to file an annual report or to pay maintenance fees, you must maintain notification of your current status with the Division. Complete the following to determine your status.

1. Enter the amount of hazardous waste in kilograms that you generated in 1995. 0
2. Enter the number of months in 1995 that you generated more than 100 but less than 1000 kilograms of hazardous waste. 0
3. If you are a Conditionally Exempt Small Quantity Generator (CESQG), enter the number of months in 1995 that you accumulated at any time more than 1000 kilograms of non-acute hazardous waste. 0
4. Enter the number of months in 1995 that you generated 1,000 or more kilograms of hazardous waste. 0
5. Enter the number of months is 1995 that you generated 1 or more kilograms of acute hazardous waste, or 100 or more kilograms of a spill or residue of acute hazardous waste. 0
6. If you are a CESQG, enter one (1) if you received a Notice of Violation in 1995, other than for over-accumulation expressed in line 3 above. _____

(Note: The waste generated from the cleanup or containment of a Superfund site or from the cleanup of a spill on public property shall be excluded from the above. Also, excluded are wastes listed under 1200-1-11.02(1)(c)(ii) or 40 CFR 261.5 (c) & (d), incorporated by reference in 1200-1-11.02(1)(a). For examples, wastes handled as H03, H05, H06 and H07; fly ash, drilling fluids, and cement kiln dusts; and still bottoms recycled onsite as long as the waste recycled has been counted once.)

If all lines 1 to 6 are zero and you do not plan to generate any hazardous waste in the future, certify and submit this form along with a revised notification and hazardous waste stream report(s).

If lines 2 to 5 are all zero, you are still a conditionally exempt small quantity generator. Certify below and fold, tape and mail this page as it is the only response you need to make. Do not staple.

If line 2 or 3 is greater than zero, and all lines 4 to 6 are equal to zero, you have changed status and are now a small quantity generator. Call the Division to obtain notification, waste stream descriptions, annual report and fee forms.

If any line 4 to 6 is greater than zero, you have changed status and are now a large quantity generator. Call the Division to obtain notification, waste stream descriptions, annual report and fee forms.

Certify this form below and return it along with the revised notification, completed annual report and fee forms. If you need to report any new wastes other than those on the enclosed computer printed forms, call the Division to obtain the annual report forms.

The annual report is due in this office or must be postmarked no later than March 1, 1996. A metered or franked imprint is not acceptable as a postmark. Under current policy, a person is subject to a penalty of up to $2,000 per month for late annual reports. A late fee penalty of 5% compounded monthly will be assessed in addition to statutory interest at the rate of 10% per annum on the fee due.

If, after reviewing these forms and instructions, you require assistance, please contact the Division. You may call 1-800-237-7018 from inside Tennessee anytime, 24 hours per day, and leave your name, phone number, EPA ID number, date called and questions. From outside Tennessee, call (615) 532-0878 from 8:00 A.M. to 4:00 P.M. CST. Someone will contact you as soon as possible to offer assistance.

Director of Solid Waste Management

Please complete and return the original.

For technical assistance, call 1-(800) 237-7018 (in Tennessee only.)

Certify that the information given is true, accurate and complete by an authorized representative of the site.

Signature of owner, manager or authorized representative	Title	Date
[signature]	Div Mgr	1-25-96

CN-0908 (Rev. 11/95)

RDA 2203

DSWM LEC

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name	EPA identification code
LARAD RAGAN TIRE AND APPLIANCE	TND 98-778-9716

2. Mailing address	City	State	Zip code
110 VILLA CIRCLE	DICKSON	TN	37055

3 a. Site address	City	State	Zip code	County name
HGWY 70 BYPASS, DICKSON, TN 37055				Dickson

b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)
00.0000	00.0000

4. Owner name (may be corporation or company name)	Type	Phone with area code
BRAD RAGAN INC		(704) 521-2174

5. Manager or operator name	Type	Phone with area code
JOHN HARGROOVE MGR		(615) 446-8061

6. Principal technical contact	FAX number with area code	Phone with area code
JOHN HARGROOVE		(615) 446-8061

7. Number of employees	Year operation began	SIC codes (Primary SIC first, etc.)	Job shop
0		7538, , ,	( ) Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	JOHN HARGROOVE		(615) 446-8061
b.			
c.			
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date

*** Below is for Department use only. ***

11. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
01-30-96	22		N	N	N

12. Date closed	TSDR status	Transporter status

13. Comments

JAN 30 1996
Solid & Hazardous Waste

CN-0909 (Rev. 11/85) RDA 2283

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility BRAD PAGAN TIRE AND APPLIANCE	EPA identification code TNC 98-[illegible]
2. Waste name. Use standard name from regulations whenever possible. WASTE COMBUSTIBLE LIQUID NOS (MINERAL SPIRITS)	**WASTE STREAM NUMBER**

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY) 6-1-95	Annual Frequency of generation Continuous Accidental Various One time
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA ~~waste codes.~~ (Primary first; six maximum.) D001,D018,D039	SIC code for generating process. 7538

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Other (3)	0.5	2.5	6.700	0.0	0.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
20.0	96.0	20.0	90

7. DOT shipping name	DOT hazard class	DOT ID code
WASTE COMBUSTIBLE LIQUID	MISC HAZ. MAT 9	NA1993

8. Describe the generation process.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
	105F		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A. PETROLEUM NAPHTHA	80	99
B. OIL WATER SOLIDS	1	20
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

RECEIVED
[illegible] 1996
Hazardous Waste

CN-0773 (Rev. 11/95) Form Continues on the Back RDA 2203

4(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1536
Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: ARGO RAGAN TIRE AND APPLIANCE
EPA identification code: TND 98-778-9716

2. Waste name. Use standard name from regulations whenever possible.: RQ HAZARDOUS WASTE LIQUID NOS (ANTIFREEZE)
WASTE STREAM NUMBER: 2

3. Give the years that this waste has been generated, e.g. 1975, 1982-.
Date no longer generated. (MM/DD/YY): 11-1-95
Annual Frequency of generation: Continuous Accidental/ Variable / One time

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).
EPA waste codes. (Primary first; six maximum.): D008, D039
SIC code for generating process.: 7538,

5. Physical form code: Liq-Wtr (2)
% Solid: 0.5
% Water: 70
Vol. to wt. conversion (pounds/gallon): 9.200
If used for fuel, chlorine content(PPM): 0.0
BTU per pound: 0.0

6. Generation rates in kilograms.
Monthly maximum (kg): 70.0
Annual average (kg): 65.0
Maximum stored onsite (kg): 150.0
Maximum days stored: 90

7. DOT shipping name: RQ HAZARDOUS WASTE LIQUID NOS
DOT hazard class: Misc Haz. Mat 09
DOT ID code: NA3082

8. Describe the generation process.

9. Chemical Characteristics.
pH: 10.2
Flash point:
Reactive code:
Concentration units. Use PPM for TCLP and EP Toxic wastes: % volume( ), % weight( ), PPM( )(V)

Major and hazardous constituents. Give range of values at right.

	lower value	upper value
A. WASTE WATER	50	70
B. WASTE ETHYLENE GLYCOL	30	50
C. WASTE PROPYLENE GLYCOL	1.5	5
D. WASTE DIETHYLENE GLYCOL	1.5	1.5
E. WASTE PHOSPHORIC ACID	1.5	1.5

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

RECEIVED
JAN 30 1996
Solid Waste

U.S. EPA REGION IV

SDMS

POOR LEGIBILITY

PORTIONS OF THIS DOCUMENT MAY BE UNREADABLE, DUE TO THE QUALITY OF THE ORIGINAL

*PLEASE CONTACT THE APPROPRIATE RECORDS CENTER TO VIEW THE MATERIAL

DSWMLQ

Hazardous Waste Notification

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, Tennessee 37219-5403

1. Organization's full name at facility. CARL'S BODY SHOP		EPA identification code TND 040645608	
2. Mailing address RT. 8, BOX 447	City DICKSON	State abbrev. TN	ZIP code 37055
3. Facility physical location or address. HIGHWAY 46, DICKSON, TN		Facility county name DICKSON	
4. Owner name CARL SMITH		Phone with area code (615) 446-4134	
5. Manager or operator name CARL SMITH		Phone with area code (615) 446-4134	
6. Principal technical contact CARL SMITH		Phone with area code (615) 446-4134	
7. Number of employees 18	Date operation began 1978	SIC codes (Primary SIC first, etc.) 7531	Job shop Yes (No)

8. Emergency contacts for 24 hours per day and 7 days per week.

	Name	Time period covered	Phone with area code
a.	CARL SMITH	WORK	(615)-446-4134
b.		HOME	(615) - 446-2001
c.			
d.			

9. Current environmental permits for air water, solid waste and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit.

NONE

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Carl Smith	Owner	7-29-86

Block is for Department use only	11. Date received	County code	Priority	Generator	Small generator	Major generator
	8-5-86	22		Y	Y	

12. Date closed	Date regulated	Date deregulated

13. Comments

Hazardous Waste Stream Description

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility.
CARL'S BODY SHOP

EPA identification code
~~NONE~~ TND 040645608

2. Waste name. Use standard name from regulations whenever possible.
WASTE PAINT THINNER

Waste Stream ID: 1

EPA waste code: F003, F005

3. Give the years that this waste has been generated, e.g. 1975, 1982-1984, June 1985-
~~since~~ 1978

4. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.
Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Otherwise toxic (f)

5. Physical form
LIQUID

Percent solid
<5% 3-5

6. Generation rate in kilograms (KG). Supply both rates.
Monthly Maximum: 163
Annual average: 1227

Volume to weight conversion (pounds per gallon)
9 LB/GAL

7. Maximum amount stored in kilograms: 489

Maximum days stored: 90

Frequency of generation
Continuous Accidental Various

8. DOT shipping name
WASTE PAINT RELATED MATERIAL

DOT hazard class
FLAMMABLE LIQ.

DOT ID. code
NA 1263

9. Describe generation process.
PAINTING AUTOMOBILES AND CLEANING UP PAINTING OPERATION

Lines 10/14 on back. Below is for department use only.

15. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Initials
Yes No	Yes No	Yes No	Yes No	07	MAH

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8)

Status Code: 3

Date Received: 8-5-86

16. Comments.

PH-2022 (SWM 12/85 Rev.)

Hazardous Waste Notification Summary DSWM L.C. JAN 02, 1991

changes on this form. Full instructions are given with Form PH-2019A.

Organization's name
CARL'S BODY SHOP

EPA ID CODE
TND 04-064-5608

Mailing address
RT 8 BOX 446

City
DICKSON

State/Zip
TN 37055

Physical location or address
HIGHWAY 46, DICKSON TN

County name
DICKSON

Latitude | Longitude
00.0000 000.0000

Owner name
CARL SMITH

Phone
(615) 446-4134

Manager or operator name
CARL SMITH

Phone
(615) 446-4134

Principal technical contact
CARL SMITH

Phone
(615) 446-4134

Number of employees	Year began	SIC codes	Job shop
18	1978	7531, , ,	NO

Emergency contacts

	Name	Time period covered	Phone
A.	CARL SMITH	WORK	(615)446-4134
B.		HOME	(615)446-2001

Current environmental permits for air, water, and radiol
Give permit type, number and expiration date. In a range of related permits,
summarize by giving the first and last permit number.
NONE

Check hazardous waste fuel burning activities below.
Fuel blending or marketing a( ) Fuel burning. . . . c( )
Transporting fuel . . . . b( )

I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date

Owner 1-24-91

For Department use only.

Date rcvd	County	Priority	Generator	Small Gen.	Special status
1-24-91	20	1	Yes No	Yes No	

Date closed	Date regulated	Date deregulated	Insp. Freq.
/00/00	/00/00	/00/00	2

Comments

Hazardous Waste Stream Report - Front JAN 02, 1991

changes on this form. Full instructions are given with Form PH-2022.

Organization's name.
CARL'S BODY SHOP

| EPA ID CODE
TND 04-064-5608

Waste name.
WASTE PAINT THINNER

| Waste stream ID
1

Give years waste generated | Date stopped | Frequency of generation
1978 /00/00 CONTINUOUS

Mark all appropriate hazard criteria below. |EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES: AF |F005 | 7531

| Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 5.01 | .01 | 8.800 | .01 | .0

Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
163 1,227 489 90

DOT shipping name | DOT hazard class | DOT ID code
WASTE PAINT RELATED MATERIAL FLAMMABLE LIQUID 1263

Describe generation process.
PAINTING AUTOMOBILES AND CLEANING UP PAINTING OPERATION

ANNUAL REPORT SECTION ** LINES 9-11

| Report Year | Amount generated during year (kg) | Amount on site on first day (kg) | Amount on site on last day (kg)
| 1990 | 1100. | 200. | 100.

| | Amount Handled by site | | TSDF handling/Waste management methods
| A | OFFSITE: 1200. | N- | T50
B	ONSITE:	Y-
C	ONSITE:	Y-
D	ONSITE:	Y-

Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
Reformulation/redesign of product a( ) d. Substituting raw materials d( )
In-process recycling. . . . . b( ) (e) Improved operations. . . . e(X)
Equipment/technology modification c( ) f. No effort. . . . . f( )

Other - explain below: . . . . . g( )

Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

more toxic-a( ) b. less toxic-b( ) (c) No change-c(X). | Amt of Reduction (kg)
0

Hazardous Waste Stream Report - Back JAN 02, 1991

Mark changes on this form. Full instructions are given with Form PH-2022.

1. Organization's name.
CARL S BODY SHOP

| EPA ID CODE
TND 04-064-5608

2. Waste name.
WASTE PAINT THINNER

* Waste stream ID
1

3. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic wastes, indicate PPM.
5.5	80-90F		% VOLUME

4. Major and hazardous constituents.

	lower	upper
A. ACETONE	15	2.5
B. METHYL ETHYL KETONE	15	25
C. METHYL ISOBUTYL KETONE	15	25
D. TOLUENE	15	25
E. PAINT SLUDGE	1	5

5. If this waste is recovered, reclaimed, recycled, or reused, describe how

FUEL BLENDING AT TSDF

6. I certify that this information is true, accurate and complete.
SIGNATURE (Generator or authorized representative), title and date.

OWNER 1-24-91

Boilerplate for department use only.

Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
02/29/	Yes No	Yes No	Yes No	Yes No	DBM

Status: Not hazardous (1); Demonstrated not hazardous (2); Status Report
Small generator (3); Resource recovery (4);
Partial exemption (5); Hazardous (6);
Incidental (7); No longer generated (8);
Variance granted (9); Conditionally exempt (A);
Mixed radioactive waste (R).

4 Y

8. Comments.

DSWM L&C

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management,
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535
Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility.
CARL'S CERTIFIED COLLISION CENTER, INC

EPA Identification code
TND 04-064-5608

2. Waste name. Use standard name from regulations whenever possible.
WASTE PAINT THINNER

Waste Stream number
1

3. Give the years that this waste has been generated. e.g. 1975, 1982-.
1978

Date no longer generated. (MM/DD/YY)

Frequency of generation (C)
Continuous Accidental/ One time Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g) WF

EPA waste codes. (Primary first; six maximum.)
F005, F003,

SIC code for generating process.
7531.

5. Physical form: Liq-Othr (3)
% Solid: 5.0
% Water: .0
Vol. to wt. conversion (pounds/gallon): 8.800
If used for fuel, chlorine content (PPM): 0.0
BTU per pound: 0.0

6. Generation rates. Supply all rates in kilograms.
Monthly maximum (kg): 163.0
Annual average (kg): 1,227.0
Maximum amount stored on-site (kg): 489.0
Maximum days stored: 90

7. DOT shipping name
WASTE PAINT RELATED MATERIAL

DOT hazard class
Flam. liquid 07

DOT ID code
1263

8. Describe generation process.
PAINTING AUTOMOBILES AND CLEANING UP PAINTING OPERATION

9. Chemical Characteristics.
pH: 5.5
Flash point: 80-90f
Reactive code:
Concentration units. For EP toxic and TCLP wastes, use PPM.
% volume( ), % weight( ), PPM( ) (V)

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. ACETONE	15	25
b. METHYL ETHYL KETONE	15	25
c. METHYL ISOBUTYL KETONE	15	25
d. TOLUENE	15	25
e. PAINT SLUDGE	1	5

10. If this waste is recovered, reclaimed, recycled or reused, describe how.
BFUEL BLENDING AT TSDF

Page 1 of 1

1993 Offsite Shipping Report

Page 1 of

For wastes shipped off-site only.

TND 04 064-5608 YY Nashville

CARL'S CERTIFIED COLLISION CENTER, INC
ATTN: CARL SMITH
525 HWY 46
DICKSON, TN 37055

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 232-7040 in Tennessee only.

2. Waste code number or "TS"	Dot Shipping Name or Waste name	EPA Waste codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility EPA ID number	Transporter EPA ID number	TSDR Mgt Method Code
a. 1	WASTE PAINT RELATED MATERIAL	D001 F003 F005	400.	1	TND 98-192-0119	ALD 09-947-6793	S01
~~b. 2~~	~~WASTE MINERAL SPIRITS~~	~~D001~~	~~102~~	~~2~~	~~TND 98-147-4125~~	~~[illegible]~~	~~S01/TS~~
c.						ILD 98-190-8202 CORRECTED 8/10/94 BOB GARDNER	
d.							
e.							
b. 2	WASTE MINERAL SPIRITS	D001	51	1	TND 98-147-4125	ILD 98-190-8202	S01/TS
c. 2	WASTE MINERAL SPIRITS	D001	51	1	TND 98-147-4125	ILD 05-106-0408 BOB GARDNER	S01/TS
f.							

3. Totals: Sum the two columns to the right.
Page totals: sum the following two columns: 502 3
Final totals: sum all page totals on last page of report.

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give date and title)

x Randy Phillips, Mgr. 1/7/94

CN-0778 (11/93)

Please Key A B C

CARDER ENGINEERING PHONE No. : 615 446 6329 Mar. 16 1994 4:03PM P07

Revised 1994

94 REPORT
DSWM
L&G

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name: CARL'S CERTIFIED COLLISION CENTER, INC	EPA identification code: TND 04-064-5608

2. Mailing address	City	State	Zip code
525 HWY 46	DICKSON	TN	37055

3. a. Site address	City	State	Zip code	County name
HIGHWAY 46, DICKSON, TN 37055				Dickson

b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)
36.0336	87.2240

4. Owner name	Type	Phone with area code
CARL SMITH		(615) 446-4134

5. Manager or operator name	Type	Phone with area code
CARL SMITH		(615) 446-4134

6. Principal technical contact	Phone with area code
CARL SMITH	(615) 446-4134

7. Number of employees	Year operation begun	SIC codes (Primary SIC first, etc.)	Job shop
18	1978	7531, , ,	Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	CARL SMITH	WORK	(615) 446-4134
b.		HOME	(615) 446-6744
c.			
d.			

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. If a range of related permits, give the first and last permit number.

NONE

10. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Randy Phillips	Manager	2/28/96

*** Below is for Department use only ***

12. Date received	County code	Priority	Generator	Small Generator	Special status
03-01-1996	22		Yes No Y	Yes No Y	

13. Date closed	Date regulated	Date deregulated

14. Comments

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MAR 01 1996
Div. of Solid & Hazardous Waste

Revised 1996

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, sign and return regardless. Retain a copy for your records.

1. Organization's full name at facility: CARL'S CERTIFIED COLLISION CENTER, INC
   EPA identification code: TND 04-064-5608

2. Waste name. Use standard name from regulations whenever possible.: WASTE PAINT THINNER/STILL BOTTOMS
   Waste Stream number: 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1978
   Date no longer generated. (MM/DD/YY):
   Frequency of generation (C): Continuous ____ Accidental/ One time ____ Various ____

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). AF
   EPA waste codes. (Primary first; six maximum.): F005,F003,D001
   SIC code for generating process.: 7531,

5. Physical form: Liq-Othr (3)
   % Solid: 5.0
   % Water: .0
   Vol. to wt. conversion (pounds/gallon): 8.800
   If used for fuel, chlorine content (PPM): 0.0
   BTU per pound: 0.0

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): 163.0
   Annual average (kg): 1,227.0
   Maximum amount stored onsite (kg): 489.0
   Maximum days stored: 90

7. DOT shipping name: WASTE PAINT RELATED MATERIAL
   DOT hazard class: Flam. liquid 07
   DOT ID code: 1263

8. Describe generation process.

   PAINTING AUTOMOBILES AND CLEANING UP PAINTING OPERATION THINNER IS USED TO CLEAN-UP PAINT EQUIPMENT. THIS DIRTY THINNER IS RECYCLED IN AN ON-SITE DISTILLATION STILL. STILL BOTTOMS ALONG WITH SCRAP PAINT IS ACCUMULATED AS WASTE STREAM #1.

9. Chemical Characteristics.
   pH: 5.5
   Flash point: 80-90F
   Reactive code:
   Concentration units. For EP toxic and TCLP wastes, use PPM.
   % volume( ), % weight( ), PPM( ) XX (V)

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. ACETONE	15	2.5
b. METHYL ETHYL KETONE	15	25
c. METHYL ISOBUTYL KETONE	15	25
d. TOLUENE	15	25
e. PAINT SLUDGE	1	5

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

    #FUEL BLENDING AT TSDF

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CN-0773 Form Continues on the Back RDA 2203 4(Y)

Tennessee Department of Environment and Conservation, Division of
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

DSWM 266

~~Please complete and/or correct, certify and return regardless. Retain a copy for your records.~~

1. Organization's full name at facility CARL'S CERTIFIED COLLISION CENTER, INC	EPA identification code TND 04-064-5608
2. Waste name. Use standard name from regulations whenever possible. DIRTY THINNER	Waste Stream number 3

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Frequency of generation (Y) Continuous / Accidental/ One time / Various
1978		

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
AF	D001 F003 F005	7531

5. Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Liq-Othr (3)	3		8.800	0.0	0.0

6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
400.0	4,600.0	250.0	0

7. DOT shipping name	DOT hazard class	DOT ID code

8. Describe generation process.

THINNER IS USED FOR CLEAN-UP OF PAINT EQUIPMENT DIRT THINNERIS ACCUMULATED & PROCESSED DAILY. (I) PROCESSED DAILY IN STILL.

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( ) ( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. ACETONE		
b. MEK		
c. MIBK		
d. TOLUENE		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

ON-SITE STILL

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Hazardous Waste Notification

DSWM L&C

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full legal name: CARL'S CERTIFIED COLLISION CENTER, INC			EPA identification code: TND 04-064-5608
2. Mailing address: 525 HWY 46	City: DICKSON	State: TN	Zip code: 37055
3 a. Site address: HIGHWAY 46, DICKSON, TN 37055	City:	State:	Zip code: / County name: Dickson
b. Latitude (degrees, minutes & seconds): 35.0350	Longitude (degrees, minutes & seconds): 87.2240		
4. Owner name (may be corporation or company name): CARL SMITH		Type:	Phone with area code: (615) 446-4134
5. Manager or operator name: CARL SMITH		Type:	Phone with area code: (615) 446-4134
6. Principal technical contact: CARL SMITH	FAX number with area code:		Phone with area code: (615) 446-4134
7. Number of employees: 10	Year operation began: 1970	SIC codes (Primary SIC first, etc.): 7531,	Job shop: (N) Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	CARL SMITH	WORK	(615) 446-4134
b.		HOME	(615) 446-6744
c.			
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ) No ( )

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Randy Phillips	2/26/96	Manager

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
03-01-1996	22		Y	Y	

12. Date closed	TSDR status	Transporter status

13. Comments

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Div. of
Solid & Hazardous Waste

CN-0939 (Rev. 11/95) RDA 2283

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

Organization's full name at facility	EPA identification code
CARL'S CERTIFIED COLLISION CENTER, INC	TNC 34-254-3608

2. Waste name. Use standard name from regulations whenever possible. | WASTE STREAM NUMBER

~~WASTE PAINT THINNER/STILL BOTTOMS~~ → WASTE PAINT / THINNER STILL BOTTOMS

3. Give the years that this waste has been generated, e.g. 1975, 1982	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation: Continuous	Accidental/ One time	Various
1978				

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process
AF	F005 F003 D001	[illegible]

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Liq-Other (3)	5.0	0	8.806	0.0	[illegible]

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
163.6	2,227.0	489.6	90

7. DOT shipping name	DOT hazard class	DOT ID code
WASTE PAINT RELATED MATERIAL	ORM-D	[illegible]

8. Describe the generation process.

PAINTING AUTOMOBILES AND CLEANING UP PAINTING OPERATION THINNER IS USED TO CLEAN-UP PAINT EQUIPMENT. THIS DIRTY THINNER IS RECYCLED IN AN ON-SITE DISTILLATION STILL. STILL BOTTOMS ALONG WITH SCRAP PAINT IS ACCUMULATED AS WASTE STREAM D1.

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
5.5	60-90F		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A. ACETONE	15	25
B. METHYL ETHYL KETONE	15	25
C. METHYL ISOBUTYL KETONE	15	25
D. TOLUENE	15	25
E. PAINT SLUDGE	1	5

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

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Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: CARL'S CERTIFIED COLLISION CENTER INC
EPA identification code: TNC 04-064-5608

2. Waste name. Use standard name from regulations whenever possible.: WASTE MINERAL SPIRITS
WASTE STREAM NUMBER: 2

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1993
Date no longer generated. (MM/DD/YY):
Annual Frequency of generation: Continuous / Accidental/ One time / Various (✓)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).: a
EPA waste codes. (Primary first; six maximum.): D001
SIC code for generating process.: 7531

5.

Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Other (1)	2	0	7.000	0.0	~~4~~ 7,000

6. Generation rates in kilograms.

Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
60.0	500.0	0.0	0

7.

DOT shipping name	DOT hazard class	DOT ID code
HAZ WASTE LIQUID	ORM-D	10

8. Describe the generation process.

MINERAL SPIRITS IS USED IN PARTS WASHER.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
	<140		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A.		
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

S01, T54

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Div. of Solid & Hazardous Waste

Sloan L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. Organization's full, legal name: CARL'S CERTIFIED COLLISION CENTER, INC			Installation identification no.: TND 04-064-5608	
2. Mailing address: 525 HWY 46	City: DICKSON	State: TN	Zip code: 37055	
3 a. Site address: HIGHWAY 46, DICKSON, TN 37055	City	State	Zip code	County name: Dickson
b. Latitude (degrees, minutes & seconds): 36.0350	Longitude (degrees, minutes & seconds): 87.2240			
4. Owner name (may be corporation or company name): CARL SMITH		Type	Phone with area code: (615) 446-4134	
5. Manager or operator name: CARL SMITH		Type	Phone with area code: (615) 446-4134	
6. Principal technical contact: CARL SMITH	FAX number + area code		Phone with area code: (615) 446-4134	
7. Number of employees: 18	Year operation began: 1978	SIC codes (Primary SIC first, etc.): 7531, , ,		Job shop: Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	CARL SMITH	WORK	(615) 446-4134
b.		HOME	(615) 446-6744
c.			
d.			

9. a. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ) No (X)
b. Do you recycle RCRA hazardous waste from onsite? Yes (X) No ( )

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Randy Phillips	Manager	2-26-99

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
03/01/1999	22		Yes No Y	Yes No Y	

12. Date closed	TSDR status	Transporter status	

13. Comments

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RDA 2203
MAR 1 1999

CN-0909(Rev.11/98)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility CARL'S CERTIFIED COLLISION CENTER, INC	**Installation identification number** TND 04-064-5608
2. **Waste name.** Use standard name from regulations whenever possible. WASTE PAINT/THINNER STILL BOTTOMS	WASTE STREAM NUMBER 1

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation
1978		Continuous ____ Accidental/ One time ____ Various (c)

4. Circle all appropriate **hazard criteria.** Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	**EPA waste codes.** (Primary first; six maximum.)	**SIC code** for generating process.
AF	F005,F003,D001	7531,

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	5.0	.0	8.800	0.0	0.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
20.0	200.0	489.0	90

7. **DOT shipping** name	DOT hazard class		DOT ID code
WASTE PAINT RELATED MATERIAL	ORM-D	10	1263

8. Describe the **generation process.**

PAINTING AUTOMOBILES AND CLEANING UP PAINTING OPERATION THINNER IS USED TO CLEAN-UP PAINT EQUIPMENT. THIS DIRTY THINNER IS RECYCLED IN AN ON-SITE DISTILLATION STILL. STILL BOTTOMS ALONG WITH SCRAP PAINT IS ACCUMULATED AS WASTESTREAM #1.

9. **Chemical Characteristics.** pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) (v)
5.5	80-90F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. ACETONE	15	25
B. METHYL ETHYL KETONE	15	25
C. METHYL ISOBUTYL KETONE	15	25
D. TOLUENE	15	25
E. PAINT SLUDGE	1	5

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

S01/T31/D81

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Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility: CARL'S CERTIFIED COLLISION CENTER, INC
   Installation identification number: TND 04-064-5608

2. **Waste name.** Use standard name from regulations whenever possible.: WASTE MINERAL SPIRITS
   WASTE STREAM NUMBER: 2

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.: 1993
   Date no longer generated. (MM/DD/YY):
   Annual **Frequency** of generation: Continuous / Accidental/ One time / Various ____ (V)

4. Circle all appropriate **hazard criteria.** Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).: A
   EPA waste codes. (Primary first; six maximum.): D001
   SIC code for generating process.: 7531.

5. **Physical form** code: Liq-Othr (3)
   % Solid: 2
   % Water: 0
   Vol. to wt. conversion (pounds/gallon): 7.000
   If used for fuel, chlorine content(PPM): 0.0
   BTU per pound: 8,000.0

6. **Generation rates** in kilograms.
   Monthly maximum (kg): 60.0
   Annual average (kg): 500.0
   Maximum stored onsite (kg): 0.0
   Maximum days stored: 0

7. **DOT shipping** name: HAZ WASTE LIQUID
   DOT hazard class: ORM-D
   10
   DOT ID code:

8. Describe the **generation process.**

   MINERAL SPIRITS IS USED IN PARTS WASHER.

9. **Chemical Characteristics.**
   pH:
   Flash point: <140
   Reactive code:
   Concentration units Use PPM for TCLP and EP Toxic wastes.
   % volume( ), % weight( ), PPM( ) ( )

Hazardous constituents. Give range of values at right.	lower value	upper value
A.		
B.		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

S02/T63

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CN-0773 (Rev. 11/95) Form Continues on the Back RDA 2203 and 2497

Sum... 4(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility CARL'S CERTIFIED COLLISION CENTER, INC	**Installation identification number** TND 04-064-5608
2. **Waste name**. Use standard name from regulations whenever possible. DIRTY THINNER	WASTE STREAM NUMBER 3

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-. 1978	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation Continuous Accidental/ One time Various ____ (V)
4. Circle all appropriate **hazard criteria**. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). AF	EPA **waste codes**. (Primary first; six maximum.) D001,F003,F005	**SIC code** for generating process. 7531.

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	3		8.800	0.0	0.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
850.0	9,000.0	250.0	0

7. **DOT shipping** name	DOT hazard class		DOT ID code
	ORM-D	10	

8. Describe the **generation process**.

THINNER IS USED FOR CLEAN-UP OF PAINT EQUIPMENT DIRT THINNER IS ACCUMULATED & PROCESSED DAILY. (1) PROCESSED DAILY IN STILL.

9. **Chemical Characteristics.**

pH	Flash point	Reactive code	**Concentration units**.Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )

Hazardous constituents. Give range of values at right.	lower value	upper value
A. ACETONE		
B. MEK		
C. MIBK		
D. TOLUENE		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

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4(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility: CARL'S CERTIFIED COLLISION CENTER, INC
   Installation identification number: TND 04-064-5608

2. **Waste name**. Use standard name from regulations whenever possible.: SPENT BRAKE FLUID
   WASTE STREAM NUMBER: 4

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.: 1997
   Date no longer generated. (MM/DD/YY):
   Annual **Frequency** of generation: Continuous Accidental/ One time Various ____ (Y)

4. Circle all appropriate **hazard criteria**. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). G
   EPA **waste codes**. (Primary first; six maximum.): D006,D039,D040
   SIC code for generating process.: 7531,

5. **Physical form code**: Liq-Othr (3)
   % Solid:
   % Water:
   Vol. to wt. conversion (pounds/gallon): 8.600
   If used for fuel, chlorine content(PPM): 0.0
   BTU per pound: 0.0

6. **Generation rates** in kilograms.
   Monthly maximum (kg): 10.0
   Annual average (kg): 35.0
   Maximum stored onsite (kg): 35.0
   Maximum days stored: 365

7. **DOT shipping** name:
   DOT hazard class: Misc Haz. Mat 09
   DOT ID code:

8. Describe the **generation process**.

   BRAKE FLUID FROM AUTOMOTIVE REPAIR.

9. **Chemical Characteristics**.
   pH:
   Flash point:
   Reactive code:
   Concentration units.Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )

   Hazardous constituents. Give range of values at right.

	lower value	upper value
A. BRAKE FLUID		
B.		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

RECEIVED
MAR 1 1999

4(Y)

For wastes shipped offsite only.

1998 Offsite Shipping Report

Page 1 of 1

TND 04-064-5608 YY - - Nashville FO

CARL'S CERTIFIED COLLISION CENTER, INC
Attn: CARL SMITH
525 HWY 46
DICKSON, TN 37055

Please complete and return this form to following address.

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2 Waste Streams or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility Installation ID	Transporter Installation ID	TSDR Handling Codes
1	STILL BOTTOMS	F005 F003 D001	220.	1	OHD 00-417-8612	TNO 00-073-8963	S01/T21/D81
2	MINERAL SPIRITS	D001	38	1	TND 98-147-4125	ILD 98-490-8202	S02/~~T63~~
4	SPENT BRAKE FLUID	D006 D039 D040	15	1	SCD 07-799-5488	ILD 98-490-8202	S02/T63
Total	Sum the two columns to the right. Page totals: sum the following two columns. Final totals: sum all page totals on last page of report		273	3			

4 Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Randy Phillips Manager 2/1/99

RECEIVED
DIV SOLID WASTE MGT
MAR 1 1999

ID No.
Group No.
File No.

CN-0779 (Rev. 11/94)

2203

Carl's Certified Collision Center, Inc. 525 Highway 46 Dickson, Tennessee 37055

DATE: 03/01/99 Check NUMBER: 8995

TREASURER, STATE OF TENN

ACCOUNT #	AMOUNT
61308	550.00

INVOICE NO :

TOTAL: 550.00

1999 Hazardous Waste Generator Maintenance Fees

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

INSTRUCTIONS

Complete the following to determine if you owe the hazardous waste maintenance fee for generators. Return the certified form even if no fees are due.

1.1	Enter the number of months in 1998 that you generated more than 100 but less than 1000 kilograms of hazardous waste.	12
1.2	If you are a Conditionally Exempt Small Quanity Generator (CESQG), enter the number of months in 1998 that you accumulated at any time more than 1000 kilograms of non-acute hazardous waste.	0
1.3	Enter the number of months in 1998 that you generated 1,000 or more kilograms of hazardous waste.	0
1.4	Enter the number of months in 1998 that you generated 1 or more kilograms of acute hazardous waste, or 100 or more kilograms of a spill or residue of acute hazardous waste.	0
1.5	If you are a CESQG, enter one (1) if you received a Notice of Violation in 1998, other than for over-accumulation as expressed in line in 1.2 above.	0

Note: Wastes generated from the cleanup or containment of a Superfund site or a spill on public property shall be excluded from the above for the fee calculations only. Also, exicuded are wastes listed under 1200-1-11-.02(1)(c)(ii) or 40 CFR 261.5 (c) & (d), incorporated by reference in 1200-1-11-.02(1)(a). For examples, wastes handled as H03, H05, H06 and H07; fly ash, drilling fluids, and cement kiln dusts; and still bottoms recycled onsite as long as the waste recycled has been counted once.

If all lines above are zero, you owe no fee. Enter zero on line 1 below and certify on line 2.

If either line 1.1 or 1.2 is greater than zero, and all lines 1.3 to 1.5 are zero, your are considered a small quantity generator for fee purposes. Enter $550 on line 1 below and certify on line 2.

If any line 1.3 to 1.5 is greater than zero, you are considered a large quantity generator for fee purposes. Enter $900 on line 1 below and certify on line 2.

Enter Name and Installation ID:

TND 04-064-5608 YY - - Nashville FO

CARL'S CERTIFIED COLLISION CENTER, INC
Attn: CARL SMITH
525 HWY 46
DICKSON, TN 37055

Please complete and return the original to the above address.

For technical assistance, call 1-(800) 237-7018 (in Tennessee only.)

1. See the instructions to determine if you owe a hazardous waste generator maintenance fee. If you are a large quantity generator, enter $900. If you are a small quantity generator, enter $550. Else, enter zero. Submit the completed form with your check or money order payable to Treasurer, State of Tennessee. Do not send cash. — $ 550.

2. Certify that the information given above is true, accurate and complete.

Signature of owner, manager or authorized representative.	Title	Date
Randy Phillips	Manager	2-10-99

Below is for DEPARTMENT USE only.

CD No.	Date received	Amount	Receipt #	Comments
A 502546		550.00	AC 9436	RECEIVED

CN-0906 (Rev. 11/95)

MAR 1 1999

RDA 2203

DSWM L&C

Gardner Engineering

SOLID AND HAZARDOUS WASTE CONSULTANTS

February 27, 1999

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
5th Floor, L & C Tower
401 Church St.
Nashville, TN 37243-1535

RE: Hazardous Waste Annual Report
Carl's Certified Collision Center
Dickson, TN
TND-04-064-5608

Dear Sir:

Enclosed are the following for the subject facility:

1. 1999 H.W. Generator Maintenance Fees
2. 1998 Off-site Shipping Report
3. H.W. Notification & Stream Report
4. Check for $550.

Thank you.

Sincerely,

Bob Gardner

Bob Gardner, P.E.
Consultant for CCCC

cc: Cindy Smith, CCCC

DIV. RECEIVED
SOLID WASTE MGT.
MAR 1 1999
Group No.
ID No.
File No.

112 Freda Lane • Burns, Tennessee 37029 • (615) 446-6320

U.S. EPA REGION IV

SDMS

POOR LEGIBILITY

PORTIONS OF THIS DOCUMENT MAY BE UNREADABLE, DUE TO THE QUALITY OF THE ORIGINAL

*PLEASE CONTACT THE APPROPRIATE RECORDS CENTER TO VIEW THE MATERIAL

Hazardous Waste Notification [redacted] 1990

Part changes on this form. Full instructions are given with Form PH-2019A.

NO Change

1. Organization's name
CLASSIC CLAWS
| EPA ID CODE
TND 98-207-8982

2. Mailing address
101 CENTER AVE
| City
DICKSON
| State/Zip
TN 37055

3. Physical location or address
101 CENTER AVE
| County name
DICKSON

Latitude | Longitude
0000 0000

4. Owner name
HAROLD DENNY
| Phone
(615) 446-3000

5. Manager or operator name
DUDLEY DENNEY
| Phone
(615) 446-3000

6. Principal technical contact
DUDLEY DENNEY
| Phone
(615) 446-3000

7. Number of employees | Year began | SIC codes | Job shop
4 1987 7216 YES

8. Emergency contacts
Name | Time period covered | Phone
A DUDLEY DENNEY 24 HR (615)446-3000

9. Current environmental permits for air, water, and radiol
Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.

10. Check hazardous waste fuel burning activities below.
Fuel blending or marketing at ( ) Fuel burning (X)
Transporting fuel ( ) Other ( )

11. Certify that this information is true, accurate and complete.
Signature of authorized representative, title, date

Space is for Department use only.

12. Date rcvd | County | Priority | Generator | Small gen. | Special status
02/27/ | | Yes No | Yes No |

13. Date closed | Date regulated | Date deregulated | Insp. Freq
/00/00 /00/00 /00/00

14. Comments

FEB 27 1991

Hazardous Waste Stream Report - Front

DEC 14, 1990

Mark changes on this form. Full instructions are given with Form PH-2022.

1. Organization's name.
CLASSIC CLNRS

| EPA ID CODE
TND 98-207-8980

2. Waste name.
WASTE PERCHLORDETHYLENE

| Waste stream ID
1

3. Give years waste generated | Date stopped | Frequency of generation
1988 - ~~[illegible]~~ /00/00 CONTINUOUS VARIOUS

4. Mark all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f)
CODES: F

| EPA waste codes | SIC
|F002 |

5. Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
SLUDGE, OTHER BASED | 20.0 | | 10.000 | .0 | | .0

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
143 858 14

7. DOT shipping name
WASTE PERCHLORETHYLENE

| DOT hazard class | DOT ID code
ORM-E UN1897

8. Describe generation process.
DRY CLEANING

9. ANNUAL REPORT SECTION 9 LINES 9-11

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1990	606.82	36.36	Ø

	Amount Handled by site	TSDF handling/Waste management methods
A	OFFSITE: 643.18	N: 501,763
B	ONSITE:	Y:
C	ONSITE:	Y:
D	ONSITE:	Y:

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
a. Reformulation/redesign of product a( ) d. Substituting raw materials d( )
b. In process recycling. . . . . b( ) e. Improved operations. . . . e( )
c. Equipment/technology modification c( ) f. No effort. . . . . f( )
g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that these reduction efforts checked in line 10 produced last year compared to the previous year.
a. More toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt of Reduction (kg)

FEB 27 1991

Hazardous Waste Stream Report - Back DEC 14, 1990

Mark changes on this form. Full instructions are given with Form PH-2022.

Organization's name.
CLASSIC CLNRS

EPA ID CODE
TND 98-207-8982

Waste name.
WASTE PERCHLOROETHYLENE

Waste stream ID
1

12. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic wastes, indicate PPM.

Major and hazardous consituents.	lower	upper
A PERCHLORETHYLENE	10	50
B PAPER, METAL, CARBON, CLAY, DIRT & WATER	50	90

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

16. I certify that this information is true, accurate and complete.
SIGNATURE! (Generator or authorized representative), title and date.

Below is for department use only.

17. Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
2279,	Yes No	Yes No	Yes No	Yes No	DBM

Status! Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastse (R); Corrective action (C).

Status	Report
4	Y

18. Comments.

FEB 27 1991

DSWM LEC

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, sign and return. Retain a copy of any changes.

1. Organization's full, legal name: [illegible] — EPA identification code: TNC [illegible]

2. Mailing address: ~~[illegible] Ave~~ ~~112 Sykes~~ — City: [illegible] — State: TN — Zip code: [illegible]

3. a. Site address: ~~112 Sykes St~~ — City: Dickson — State: TN — Zip code: 37055 — County name: Dickson

b. Latitude (degrees, minutes & seconds): [illegible] — Longitude (degrees, minutes & seconds): [illegible]

4. Owner name: ~~[illegible]~~ Dudley Denney — Type: — Phone with area code: [illegible]

5. Manager or operator name: [illegible] — Type: — Phone with area code: [illegible]

6. Principal technical contact: — Phone with area code: [illegible]

7. Number of employees: 5 — Year operation began: [illegible] — SIC codes (Primary SIC first, etc.): [illegible] — Job shop: Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	[illegible]	[illegible]	[illegible]
b.			
c.			
d.			

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.

10. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

11. Certify that the information given in the document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Dudley Denney	owner-mgr	2-8-95

For Solid Waste Department use only

12. Date received: 02-27-1995 — County code: [illegible] — Priority: — Generator Yes (No) / — Small Generator Yes (No) / — Special status:

13. Date closed: — Date regulated: — Date deregulated:

14. Comments:

RECEIVED JUN 01 1995 Solid & Hazardous Div. of

RECEIVED FEB 27 1995 Div. of RDA 2203

TN 0000 (Rev. 12/94)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility CLASSIC CLEANS	EPA identification code TND 98-207-8982
2. Waste name. Use standard name from regulations whenever possible. WASTE PERCHLOROETHYLENE	Waste Stream number 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.

Date no longer generated. (MM/DD/YY) 12-22-94

Frequency of generation: Continuous / Accidental/ One time / Various (V)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).

EPA waste codes. (Primary first; six maximum.) F002

SIC code for generating process. 7216

5. Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Sludge (other)	50.0	.5	10.000	0.0	0.0

6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
183.3	558.9	0.0	14

7. DOT shipping name	DOT hazard class		DOT ID code
WASTE PERCHLOROETHYLENE	ORM-E	9	UN1897

8. Describe generation process.

DRY CLEANING

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. PERCHLOROETHYLENE	10	50
b. PAPER, METAL, CARBON, CLAY, DIRT & WATER	50	90
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

SEP SYSTEMS

RECEIVED FEB 27 1995

SR-0173 Form Continues on Back RDA 2203 (1)

JUN 07 1995 DIV. OF SOLID & HAZARDOUS WASTE

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243 - 1535

March 25, 1998

CERTIFIED MAIL # P 446-335-992
RETURN RECEIPT REQUESTED

Classic Cleaners
ATTN: Ricky R. Nelson
112 Sylvis St.
Dickson, TN 37055

Dear Mr. Nelson:

RE: Notice of Violation

The Division of Solid Waste Management conducted a review of its records. The record review revealed that your facility has failed to submit an Annual Report for 1997, as required by Tennessee Code Annotated (T.C.A.) Section 68-212-105 and subsequent Rules.

Rule 1200-1-11-.03(5)(b) states that a generator of more than 100kg of hazardous waste in any month during the preceding year must submit an Annual Report to the Department by March 1 of this calendar year. Such report must be submitted on forms provided by the Department, and the forms must be completed according to the instructions accompanying them.

Please be advised that the Tennessee Hazardous Waste Management Act (T.C.A.) Section 68-212-101 et seq provides that violators are subject to civil penalties of up to fifty thousand dollars ($50,000) per day, per violation in addition to damages to the state resulting from investigating violations and enforcing the Act. This matter is being referred to the hazardous waste enforcement section for appropriate action. You will continue to be in violation of Rule 1200-1-11-.03(5)(b) until the Department receives your Annual Report.

If you have any questions regarding this matter, please call Dennis Woodson at (615) 532-0487.

Sincerely,

Bobby W. Morrison, Manager
Waste Activity Audit

BWM/DW/jk/

cc: Nashville Field Office

VSWM LOG RECEIVED

Hazardous Waste Notification

MAR 04 1999

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535 Solid & Hazardous Waste

~~Please complete and/or correct, certify and return. Retain a copy for your records.~~

1. Organization's full, legal name CLASSIC CLNRS			Installation identification no. TNR 00-000-0687	
2. Mailing address 112 SYLVIS ST	City DICKSON	State TN	Zip code 37055	
3 a. Site address 112 SYLVIS ST DICKSON TN 37055	City	State	Zip code	County name Dickson
b. Latitude (degrees, minutes & seconds) 00.0000	Longitude (degrees, minutes & seconds) 00.0000			
4. Owner name (may be corporation or company name) RICKY R NELSON		Type P	Phone with area code (615) 446-3000	
5. Manager or operator name RICKY R NELSON		Type P	Phone with area code (615) 446-3000	
6. Principal technical contact RICKY R NELSON	FAX number + area code N/A ( ) xxx-1132		Phone with area code (615) 446-3000	
7. Number of employees 5	Year operation began 1995	SIC codes (Primary SIC first, etc.) 7216, , ,		Job shop Yes No ( )

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	RICKY R NELSON	6PM-6AM	(615) ~~[illegible]~~-5992 (615) 446 6279
b.	PAM ~~NELSON~~	~~6AM-6PM~~	(615) ~~799~~-2355
c.	CLASSIC CLEANERS (RICKY NELSON)	6AM-5PM	(615) 446-3000
d.			

9. a. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ) No (✓)
b. Do you recycle RCRA hazardous waste from onsite? Yes( ) No (✓)

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Ricky R Nelson	OWNER	2/25/99

***** Below is for Department use only *****

11. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
03/04/1999	22		Y	Y	

12. Date closed	TSDR status	Transporter status

13. Comments

RECEIVED

MAR 0 4 1999

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility CLASSIC CLNRS	**Installation identification number** TNR 00-000-0687
2. **Waste name.** Use standard name from regulations whenever possible. WASTE PERCHLOROETHYLENE	WASTE STREAM NUMBER 1

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-. 1988-	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation Continuous Accidental/ Various One time ____ (Y)
4. Circle all appropriate **hazard criteria.** Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). F	EPA **waste codes**. (Primary first; six maximum.) F002	**SIC code** for generating process. 7216,

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Sldg-Othr (6)	20.0	.5	10.000	0.0	0.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
143.0	858.0	0.0	14

7. **DOT shipping** name	DOT hazard class	DOT ID code
WASTE PERCHLOROETHYLENE	12	UN1897

8. Describe the **generation process.**

DRY CLEANING.

9. **Chemical Characteristics.**

pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )

Hazardous constituents. Give range of values at right.	lower value	upper value
A. PERCHLORETHYLENE	10	50
B. PAPER METAL CARBON CLAY DIRT & WATER	50	90
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

S01 (Pick-up by MCF Systems Atlanta, Inc

4(Y)

(11A) 379.55

11. Annual Generation and Handling Data: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year	A. Amount generated during year (kg)	B. Amount onsite Jan. 1 in temp. storage (kg)	C. Amount onsite Dec. 31 in temp. storage (kg)	D. Amount handled (kg)
1998	348.62	58.0	58.0	379.55

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	379.55 kg	T07/T16/S01/S02 T54/T63	D2	Ø kg	N/A
D3	Amount Handled ONsite N/A kg	TSDR handling/Waste management methods N/A	D4	Amount Handled ONsite N/A kg	TSDR handling/Waste management methods N/A

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.

13. Identify the **efforts** undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product (A)
B. In process recycling (B)
C. Equipment/technology modification (C)
D. Substituting raw materials (D)
E. Improved operations (E)
F. Reduction research/planning (R)
G. No effort (F)
H. Other - briefly explain here (G)

Continued training in refinement of distilling process

14. Rate the **helpfulness** of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance A(No NA Yes)
B. Technical feasibility B(No NA Yes)
C. Economic practicality C(No NA Yes)
D. Measurement/accounting methods D(No NA Yes)
E. TN hazardous waste regulations E(No NA Yes)
F. Implementation experience F(No NA Yes)
G. High costs of haz. waste mgt G(No NA Yes)
H. Accidental generation H(No NA Yes)
I. Other - describe here: I (No NA Yes)

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

In our attempt to reduce waste our distilling process is almost at optimum. I've been pleased with the sludge versus liquid ratio when cleaning out our machine.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
Ricky R Nelson	Owner	2/25/99

Below is for Department use only.

17. Date received (MM/DD/YY)	Complete? Yes No	Test results? Yes No	Reasonable? Yes No	Follow-up Yes No	Initials
06/28/1999					DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes(R); Corrective Action (C); Waste water Rx(W); Universal Waste (U)

Status: D

Further Reporting

18. Comments. NOD correction

RECEIVED
DIV SOLID WASTE MGT
JUN 28 1999

Group No. _____ File No. _____

ID No. _____

For wastes shipped offsite only.

1998 Offsite Shipping Report

Page 1 of 1

TNR 00-000-0687 YY - - Nashville FO

CLASSIC CLNRS
Attn: RICKY R NELSON
112 SYLVIS ST
DICKSON, TN 37055

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2. Waste Streams or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility Installation ID	Transporter Installation ID	TSDR Handling Codes
a. FS 1	Perchloroethylene	F002	379.55	4	GAD981269095	GAD 981 269095 SAME	~~M051~~ S01 T-6.3 M052 S02 T07 ~~M053~~ T54
b.							
c.							
d.							
e.							
f.							
g.							
h.							
3. Totals: Sum the two columns to the right. Page totals: sum the following two columns			379.55	4			
Final totals: sum all page totals on last page of report							

MAR 04 1999
Solid Waste

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Ricky R Nelson OWNER 2/25/99

CN-0779 (Rev. 11/94)

?203

DGWM. L&C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243 - 1535

May 26, 1999

Classic Cleaners
ATTN: MR. RICKY NELSON
112 Sylvis Street
Dickson, TN 37055

EPA I.D. Number: TNR 00-000-0687

RE: Notice of Deficiency

The Division of Solid Waste Management conducted a review of your 1998 annual report and found deficiencies pertinent to your facility as noted in the attachment. These deficiencies must be corrected within 30 days after the receipt of this letter.

Tennessee Code Annotated (T.C.A.) Section 68-212-105 and T.C.A. Section 68-212-306 and the rules promulgated under these Acts, require that generators file an annual report.

Rule 1200-1-11-.03(5)(b) states that a generator must submit an annual report to the Department by March 1 for the proceeding calendar year. Such Report must be submitted on forms provided by the Department, and the forms must be completed according to the instructions accompanying it.

Please be advised that the Tennessee Hazardous Waste Management Act (T.C.A.) Section 68-212-101 et seq provides that violators are subject to civil penalties of up to fifty thousand dollars ($50,000) per day, per violation in addition to damages to the state resulting from investigating violations and enforcing the Act. Your continued noncompliance will result in this matter being referred to our enforcement section for the assessment of the appropriate civil penalties.

If you have any questions regarding this matter, please call me at (615) 532-0487.

Sincerely,

Dennis Woodson

Dennis Woodson
Environmental Specialist
Waste Activity Audit

DBW/jknod/nelson3

Attachment

cc: Nashville EAC Office

Summary of Deficiencies

Environmental Specialist: DBW
Nashville EAC

Classic Cleaners
ATTN: Ricky Nelson
112 Sylvis Street
Dickson, TN 37055

TNR 00-000-0687

Waste Stream 1:

There is a discrepancy in the amount onsite in temporary storage on the first day of the year (11B). You have given as the amount 27.07 kg. The 1997 report showed 58 kilograms on site the end of the year (11C). You see whatever is onsite the last day of the year (12/31/1997) should be onsite the first day of the following year (1/1/98). The amount in section 11B should be 58 kgs. If 379.55 (11D1) is the correct amount shipped then the amount handled 11A would be 348.62. Then the calculation will work as followed: (348.62 + 58) - 27.07 = 379.55 (11D & D1)

Initial and date beside all revisions and send the corrected copies to my attention. Be sure to keep a corrected copy for your files.

DYLORA LEC

TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT
COMPLIANCE MONITORING AND ENFORCEMENT ACTIVITY REPORT

1 ID NO: TND 042441617 NAME: Community Newspaper, Inc.
ADDRESS: 104 S Church St Dickson, TN

HANDLER TYPE: Major ☐ Non-Major ■

2. PROGRAM: Hazardous Waste ■ Solid Waste ☐ ENTRY TYPE: New ☐ Update ☐

3 DATE OF INITIAL EVALUATION:

TYPE OF EVALUATION

4. EVALUATION INSPECTION 5/8/94

A. FULL CHECKLIST
1. HW Gen ☐
2. HW Trans ☐
3. HW TSDF ☐
4. HW SQ Gen ☐
5. HW Non-Resp ■
6. SW Processing Facility ☐
7. SW Landfill ☐

B. OTHER
1. Partial Checklist ☐
2. CL Eval ☐
3. P-CL Eval ☐
4. Special Waste Evaluation ☐
5. Part A Modification/Withdrawal Eval ☐
6. Complaint Follow-up NOS ☐
7. Emergency Response ☐
8. Other ☐

5. SAMPLING INSPECTION / /
1. Generated Waste ☐
2. Received Waste ☐
3. Soil/Sediment ☐
4. Surface water/Leachate ☐
5 Ground Water ☐
6. Ambient Air ☐

6 SPECIAL INSPECTION / /
1. Groundwater Monitoring ☐
2. Other (describe in comments) ☐

7. RECORDS/REPORT REVIEW (non-permitting) / /
1. Closure/Post Closure Cost Estimates ☐
2. Closure/Post Closure Plans ☐
3. Financial Instruments ☐
4. Other Required TSDF Plans ☐
5. Special Waste Requirements ☐
6. Landfill Planning Annual Report ☐
7. Manifest Reports ☐
8. Manifest Records ☐
9. GMM Data ☐
10 GMM Plans ☐
11. Other ☐

8. FOLLOW-UP INSPECTION / /
1 With Field Office Personnel Only ☐
2. With Central Office Personnel ☐

9 INCIDENT PROCESSING / /
1 Oral Complaint ☐
2. Written Complaint ☐
3 Emergency Response Call ☐
4 Other (describe) ☐

10 MISCELLANEOUS / /
1. Facility Status, Evaluation, Meetings/Letters ☐
2. Other (describe in comments) ☐

11 VIOLATION CODES: None ■

12 ENFORCEMENT ACTIONS:

	Date Action Taken	Sched Comp Date	Actual Comp Date
Warning Letter	/ /	/ /	/ /
Notice of Non-Compliance	/ /	/ /	/ /
Compliance Review Meeting	/ /	/ /	/ /
Referred to Enforcement Section	/ /		

13. COMMENTS: (continue on reverse if necessary) Notifiaye hazardous wastes are not generated at this site

14. Prepared by:	ID Code:	Date:	Field Office:
Mark McWhorter	044	5-23-94	NFO. 102

U.S. EPA REGION IV

SDMS

POOR LEGIBILITY

PORTIONS OF THIS DOCUMENT MAY BE UNREADABLE, DUE TO THE QUALITY OF THE ORIGINAL

*PLEASE CONTACT THE APPROPRIATE RECORDS CENTER TO VIEW THE MATERIAL

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

DEC

1. Facility's full legal name: Dickson Electric Dept.
EPA Identification code: TND 98 778 1729

2. Mailing address: P.O. Box 632 | City: Dickson | State: TN | Zip code: 37055

3. Site address: East Chestnut St. | City: Dickson | State: TN | Zip code: 37055 | County name: Dickson

4. Latitude (degrees, minutes & seconds) | Longitude (degrees, minutes & seconds)

5. Owner name: Dickson Electric Dept | Type: M | Phone with area code: 615 446-9051

6. Manager or operator name: James E. Parker | Type: M | Phone with area code: 615 446-9051

7. Principal technical contact: Thomas Parchmont | Phone with area code: 615 446-9051

8. Number of employees: 65 | Year operation began: 1936 | SIC codes (Primary SIC first, etc.): 4911 Municipal utility | Job shop: Yes (No)

9. Emergency contacts for 24 hours per day, and 7 days per week.

Name	Time period covered	Phone with area code
James Parker	See Attached List	615 412-4871
Butch Dean		615 446-7719
Mike Billingsby		615 446-6871
Thomas Parchmont		615 446-6879

10. List current environmental (air, water, and radiological) permits. Give permit type, (source, number) and expiration date.
If a large list of related permits, give the first and last permit number.

11. Do you accept RCRA hazardous waste from offsite and recycle it? Yes / No

12. I certify that the information given in this document is true, accurate and complete by signing and dating.
Signature of authorized representative: James E. Parker | Title: Manager | Date: 9-6-95

13. Below for EPA Use Only

Date received	County code	Priority	Generator (Yes/No)	Transporter (Yes/No)	Transporter No.	Special status
09/20/1995	22					

Date letter sent	Date hazbased	Date delinquent

14. Comments

RECEIVED
SEP 08 1995

Line 8 Emergency Contact

a. James Peeler, 615-446-9051 7:00 AM - 4:00 PM
Mon - Fri, any Time after 615-412-4571

b. Butch Dean, 615-446-9051 7:00 AM - 4:00 PM
Mon - Fri, anytime after work 615-446-1919

c. Mike Billingsby, 615-446-9051 7:00 AM - 4:00 PM
Mon - Fri, anytime after work 615-446-6871

D. Thomas Parchment, 615-446-9051
7:00 AM - 4:00 PM Mon - Fri anytime after
work 615-446-4879

RECEIVED
SEP 18 1985
DIV.

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

1. Organization's full name at facility. Dickson Electric
EPA Identification code TND 981 181 139

2. Waste name. Use standard name from regulations whenever possible. Nickel Cadmium Batteries
Waste Stream number ~~FDA~~ 001

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1995
Date no longer generated. (MM/DD/YY) 5/10/95
Frequency of generation: Continuous / Accidental/ One time / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g). (c) Doc 2/Doc 6
EPA waste codes. (Primary first; six maximum.)
SIC code for generating process. 4911

5. Physical form: Liquid/Solid
% Solid: 80
% Water: 10
Vol. to wt. conversion (pounds/gallon): 3.4
If used for fuel, chlorine content (PPM): ~~0~~
BTU per pound: ~~0~~

6. Generation rates. Supply all rates in kilograms.
Monthly maximum (kg): ---
Annual average (kg): 307 Kg
Maximum amount stored on-site (kg): 307 Kg
Maximum days stored: 5 mo 5/10/95

7. DOT shipping name: Hazardous Waste Liquid N.O.S. (Cadmium)
DOT hazard class: 9
DOT ID code: UN 3082

8. Describe generation process.
One time disposal of old Nickel/Cadmium batteries

9. Chemical Characteristics.
pH: <2
Flash point: N/A
Reactive code: N/A
Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )

Major and hazardous constituents. Give range of values at right.	Lower value	Upper value
a. Battery Nickel/Cadmium		90
b. Sulfuric Acid	0	10
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.
Reclaimed for the Nickel and Cadmium content

WS#1 TND 98-778-1737

11. Annual Generation and Handling Data: If the waste was shipped off-site, summarize in block (a) and submit an Off-site Shipping Report. Report onsite handling in blocks (b) - (d). For offsite or onsite handling that requires interim status or a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "M" codes.

Report Year	Amount generated during year (kg)	Amount on-site in temporary storage on the first day of year (kg)	Amount on-site in temporary storage on the last day of year (kg)
1995	307 kg	NONE	307 kg

	Total Handled Offsite	TSDR Handling/Waste management methods		Amount Handled Onsite	TSDR Handling/Waste management methods
a	307 kg	S01	b		
c	Amount Handled Onsite	TSDR handling/Waste management methods	d	Amount Handled Onsite	TSDR handling/Waste management methods

Hazardous Waste Reduction Data: Large Quantity Generators (LQGs) in 1989 are required to answer questions 12-15. Generators not in operation in 1989 have a different schedule for required reporting; see the instructions. Small Quantity generators (SQGs) in 1989 are not required to answer questions 12-15 until the report due for calendar year 1994. However, we urge SQGs to answer them as it should help later when answers are required.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units. See instructions for further details.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.

13. Check the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods.

a. Reformulation/redesign of product . (a)
b. In process recycling. . . . . (b)
c. Equipment/technology modification . (c)
d. Substituting raw materials . . . . (d)
e. Improved operations . . . . . (e)
f. Reduction research/planning . . . . . (r)
g. No effort . . . . . (f)
h. Other - briefly explain here. . . . . (g)

14. Rate the helpfulness of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

a. Training or technical assistance.....a(No NA Yes)
b. Technical feasibility.....b(No NA Yes)
c. Economic practicality.....c(No NA Yes)
d. Measurement/accounting methods.....d(No NA Yes)
e. TN hazardous waste regulations.....e(No NA Yes)
f. Implementation experience.....f(No NA Yes)
g. High costs of haz. waste mgt....g(No NA Yes)
h. Accidental generation.....h(No NA Yes)
i. Other - describe here:.....i(No NA Yes)

15. Narrative: provide additional explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

One time Disposal of Nickel/Cadmium Batteries

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative) Thomas Parahment | TITLE: Transformer Maint. | DATE: 8-10-95

"X" Below is for Department use only.

17. Date received (MM/DD/YY) 08-08-1995 | Complete? Yes No | Test results? Yes No | Reasonable? Yes No | Follow up Yes No | Initials DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (B); Corrective Action (C); Waste Water Rx (W).

Status: 8 | Further Reporting: 9 X

18. Comments: Could be LQG of Hazardous

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, TN 37243-1535

September 13, 1995

Mr. Thomas Parchment
Dickson Electric Dept.
PO Box 627
Dickson, TN 37055

Re: EPA ID Number
Site Location: East Chestnut Street
Dickson, TN 37055

Dear Mr. Parchment:

This letter will serve as official notice of your EPA ID Number TND 98-778-1739 which should be used on all reports and correspondence submitted to the Department.

The EPA ID Number is assigned to this specific physical location. Should you ever relocate, you would be required to apply for a new EPA ID Number for that location.

If you have further questions about this subject please contact Dennis Woodson at (615) 532-0487.

Sincerely,

Bobby W. Morrison, Manager
Waste Activity Audit
Division of Solid Waste Management

BWM/DBW/mb

cc: Nashville Field Office

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
L & C Tower, 11th Floor, 401 Church Street, Nashville, TN 37243-1535

Mod Called 3/15/96

1. Generator's EPA ID number: TN DICKSON ELECTRIC DEPT — 1996 FEB -9 AM 9:33 — EPA ID: TNR 000 178 179

2. Name of site: DICKSON ELECTRIC DEPT — City: DICKSON — State: TN — Zip code: 37055

3. Site address: EAST CHESTNUT ST DICKSON TN 37055 — City: — State: — Zip code: — County: DICKSON

4. Latitude (degrees, minutes & seconds): — Longitude (degrees, minutes & seconds): 00.0000

5. Owner name (city or corporation or company name): DICKSON ELECTRIC DEPT — Type: M — Phone with area code: (615) 446-9051

6. Manager by operator name: JAMES E. PEELER — Type: — Phone with area code: (615) 446-9051

7. Principal technical representative: — FAX number with area code: — Phone (615) area code)

8. Number of employees: — Year operation began: — SIC codes (Primary SIC first, etc.): — Job shop (H): Yes No

9. Emergency contacts for 24 hours per day and 7 days per week:

Name	Time period covered	Phone with area code
JAMES PEELER	SEE ATTACHED	(615) 412-4571
BUTCH DEAN	SHEET	(615) 446-1719
MIKE BILLINGSBY		(615) 446-6871
THOMAS PARCHMENT		(615) 446-4879

10. Do you receive RCRA hazardous waste from others and recycle it? Yes ( ) No (X)

11. I certify that the information given in this document is true, accurate and complete by signing and dating.
Signature of authorized representative: Thomas Parchment — Title: Transit Mgr — Date: 1-5-96

12. Date received: 1-05-96 — Catalog code: 22 — Priority: — Unacceptable: Yes (No) — Small Quantity: Yes (No) — Special status:

13. Date closed: — TSDR status: — Transporter(s) code:

14. Comments:

RECEIVED
MAR 05 1996
RCA 2203
Div. of Solid & Hazardous Waste

TDEC-SWM (Rev. 11/95)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, sign and return regardless. Retain a copy for your records.

1. Organization's full name at facility: TENNESSEE ELECTRIC DEPT
   EPA identification code: TND 98-178-1739

2. Waste name: Use standard name from regulations whenever possible. NICKEL/CADMIUM BATTERIES
   WASTE STREAM NUMBER: 1

3. Give the years that this waste has been generated, e.g. 1975, 1982: 1993
   Date no longer generated. (MM/DD/YY): 08-10-93
   Annual Frequency of generation: Continuous / Accidental / Various / One time (A)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). CB
   EPA waste codes. (Primary first; six maximum.) D002, D006
   SIC code for generating process. 4911,

5. Physical form code: Bld-Other (9) | % Solid: 80 | % Water: 10 | Vol. to wt. conversion (pounds/gallon): 8.900 | If used for fuel, chlorine content (PPM): 0.0 | BTU per pound: 0.0

6. Generation rates in kilograms.
   Monthly maximum (kg): 0.0
   Annual average (kg): 307.0
   Maximum stored onsite (kg): 307.0
   Maximum days stored: 0

7. DOT shipping name: HAZARDOUS WASTE LIQUID NOS (CADMIUM).
   DOT hazard class: Misc Haz. Mat | 09
   DOT ID code: NA3082

8. Describe the generation process.
   ONE TIME DISPOSAL OF OLD NICKEL/CADMIUM BATTERIES.

9. Chemical Characteristics.
   pH: 7.3
   Flash point:
   Reactive code:
   Concentration units. Use PPM for TCLP and EP Tox wastes (% volume(), % weight(), PPM.) (%)

   Major and hazardous constituents. Give range of values at right.

		lower value	upper value
A.	BATTERY NICKEL/CADMIUM		90
B.	SULFURIC ACID	0	10
C.			
D.			
E.			

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

R-90 Battery Reclamation

RECEIVED
MAR 0 5 1996
DIV. OF SOLID WASTE MGMT.

SN-0722 (REV. 12/95) Formerly HW-0722 (Rev. 12/94) MDA122203

1996 Offsite Shipping Report

For wastes shipped offsite only.

Page 1 of 1

TNO 98-778-1739 YY - - Nashville

ICKSON ELECTRIC DEPT
Attn: THOMAS PERCHMENT
PO BOX 627
DICKSON, TN 37055

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete the form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

RECEIVED MAR 05 1996 Solid Waste

Waste Streams "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility EPA ID Number	Transporter EPA ID Number	TSDR Handling Codes
1	Nickle Cadmium Hazardous Waste Liquid	D002 D006	307	1	TND006457720	MDD980554653	S01

Totals: Sum the two columns to the right.
Page totals: sum the following two columns
Final totals: sum all page totals on last page of report 307 1

Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Thomas Perchment Transf. Maint.

RDA 3203

1996 Hazardous Waste Generator Maintenance Fees

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

INSTRUCTIONS

Complete the following to determine if you owe the hazardous waste maintenance fee for generators. **Return this certified form even if no fees are due.**

1.1 Enter the number of months in 1995 that you generated more than 100 but less than 1000 kilograms of hazardous waste. ___1___

1.2 If you are a Conditionally Exempt Small Quantity Generator (CESQG), enter the number of months in 1995 that you accumulated at any time more than 1000 kilograms of non-acute hazardous waste. ___0___

1.3 Enter the number of months in 1995 that you generated 1,000 or more kilograms of hazardous waste. ___0___

1.4 Enter the number of months in 1995 that you generated 1 or more kilograms of acute hazardous waste, or 100 or more kilograms of a spill or residue of acute hazardous waste. ___0___

1.5 If you are a CESQG, enter one (1) if you received a Notice of Violation in 1995, other than for over-accumulation as expressed in line in 1.2 above. ___0___

Note: Wastes generated from the cleanup or containment of a Superfund site or a spill on public property shall be excluded from the above for the fee calculations only. Also excluded are wastes listed under 1200-1-11.02(1)(c)(ii) or 40 CFR 261.5 (c) & (d); incorporated by reference in 1200-1-11.02(1)(a). For examples, wastes handled as H03, H05, H06 and H07; fly ash, drilling fluids, and cement kiln dusts; and still bottoms recycled onsite as long as the waste recycled has been counted once.

If all lines above are zero, you owe no fee. Enter zero on line 1 below and certify on line 2.

If either line 1.1 or 1.2 is greater than zero, and all lines 1.3 to 1.5 are zero, your are considered a small quantity generator for fee purposes. Enter $550 on line 1 below and certify on line 2.

If any line 1.3 to 1.5 is greater than zero, you are considered a large quantity generator for fee purposes. Enter $900 on line 1 below and certify on line 2.

Enter Name and EPA ID:

IND 78-778-1739 YY - - Nashville

DICKSON ELECTRIC DEPT
ATTN: THOMAS PERCHMENT
PO BOX 627
DICKSON, TN 37055

Enter phone number with area code:

Please complete and return the original to the above address.

For technical assistance, call 1-(800) 237-7018 (in Tennessee only.)

1. See the instructions to determine if you owe a hazardous waste generator maintenance fee. If you are a large quantity generator enter $900. If you are a small quantity generator, enter $550. Else, enter zero. Submit the completed form with your check or money order payable to *Treasurer, State of Tennessee*. Do not send cash. $550.00

2. Certify that the information given above is true, accurate and complete.

Signature of owner, manager or authorized representative: Thomas Perchment
Title: Treas. Mgr.
Date: 2-1-96

Below is for DEPARTMENT USE ONLY:

CD No.	Date Received	Amount	Receipt #	Comments
A5011763	MAR 12 1996	550.00	AC1946	

CN-0905 (Rev. 1/95)

RDA 2203

DICKSON ELECTRIC DEPARTMENT, DICKSON, TN 37055

CHECK DATE: 03/07/96 NAME: TREASURER, STATE OF TN CHECK NUMBER 0011456

DATE	IDENTIFIER	DESCRIPTION	AMOUNT PAID
03/07/96	02-138-96	HAZARDOUS WASTE FEE 1996	$550.00
		TOTAL AMOUNT PAID	$550.00

DETACH BEFORE DEPOSITING

ID: TN1 [illegible] NAME: Dickson Printing

ADDRESS: E. College, Dickson TN.

HANDLER TYPE: Major ☐ Non-Major ■

PROGRAM: Hazardous Waste ■ Solid Waste ☐ | ENTRY TYPE: New ☐ Update ☐

HW INITIAL EVALUATION:

TYPE OF EVALUATION

EVALUATION INSPECTION 5/18/84

A. FULL CHECKLIST
1. HW Gen ☐
2. HW Trans ☐
3. HW TSDF ☐
4. HW SQ Gen ☐
5. HW Non-Resp ■
6. SW Processing Facility ☐
7. SW Landfill ☐

B. OTHER
1. Partial Checklist ☐
2. CL Eval ☐
3. P-CL Eval ☐
4. Special Waste Evaluation ☐
5. Part A Modification/Withdrawal Eval ☐
6. Complaint Follow-up NOS ☐
7. Emergency Response ☐
8. Other ☐

SAMPLING INSPECTION / /
1. Generated Waste ☐
2. Received Waste ☐
3. Soil/Sediment ☐
4. Surface water/Leachate ☐
5. Ground Water ☐
6. Ambient Air ☐

SPECIAL INSPECTION / /
1. Groundwater Monitoring ☐
2. Other (describe in comments) ☐

RECORDS/REPORT REVIEW (Non-permitting) / /
1. Closure/Post Closure Cost Estimates ☐
2. Closure/Post Closure Plans ☐
3. Financial Instruments ☐
4. Other Required TSDF Plans ☐
5. Special Waste Requirements ☐
6. Landfill Planning Annual Report ☐
7. Manifest Reports ☐
8. Manifest Records ☐
9. GW Data ☐
10. GW Plans ☐
11. Other ☐

FOLLOW-UP INSPECTION / /
1. With Field Office Personnel Only ☐
2. With Central Office Personnel ☐

INCIDENT PROCESSING / /
1. Oral Complaint ☐
2. Written Complaint ☐
3. Emergency Response Call ☐
4. Other (describe) ☐

MISCELLANEOUS / /
1. Facility Status, Evaluation, Meetings/Letters ☐
2. Other (describe in comments) ☐

VIOLATION CODES: None ■

ENFORCEMENT ACTIONS:	Date Action Taken	Sched Comp Date	Actual Comp Date
Warning Letter	/ /	/ /	/ /
Notice of Non-Compliance	/ /	/ /	/ /
Compliance Review Meeting	/ /	/ /	/ /
Referred to Enforcement Section	/ /		

13. COMMENTS: (continue on reverse if necessary) Notifiable hazardous wastes are not generated at this site.

14. Prepared by:	ID Code:	Date:	Field Office:
Mark McClanta	044	5-22-84	NFU - 10

SWM LOC

JAN 06,

Hazardous Waste Notification Summary

See full instructions for Form PH-2019A for additional information and codes.

1. Organization's name
~~DISSER ENTERPRISES INC~~
Disser Enterprises, Inc.

| EPA ID CODE
TND 98-216-1786

2. Mailing address
~~6609 ELLESMERE RD~~
6629 Ellesmere Rd.

| City
NASHVILLE

| State|Zip
TN 37205

3. Physical location or address
HWY 46 DICKSON TN 37055

| County name
DICKSON

Latitude | Longitude
.0000 .0000

4. Owner name
WASHLAND CUSTOM CLEANERS

| Phone
(615) 446-581

5. MANAGER OR operator name
~~PHILLIP DISSER~~

| Phone
(615) 356-9443

6. Principal technical contact
~~PHIL DISSER~~
Phil Disser

| Phone
(615) 356-9443

7. Number of employees | Year began | SIC codes
3 1987 7216

| Job shop

8. Emergency contacts
Name
~~1. PHIL DISSER~~
Phil Disser

| Time period covered | Phone
24 HRS (615)297-6871

9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.

10. I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date

2-21-89

Below is for Department use only.

11. Date rcvd | County | Priority | Generator | Small Gen. | Special status
2-28-89 | 22 | | Yes No | Yes No |

12. Date closed | Date regulated | Date deregulated | Insp. Freq.
/00/00 /00/00 /00/00

13. Comments

RECEIVED
FEB 28 1989
DIV. OF SWM

Hazardous Waste Stream Report - Front JAN 06,

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name.
~~DRESSEN~~ ENTERPRISES INC DISSEK

| EPA ID COD
TND 98-216-17

2. Waste name.
Waste Perchlorethylene Filters

| Waste stream
*
1

3. Give years waste generated | Date stopped | Frequency of generation
1987 - - Continuous

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC CODES |
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)

| F002- | 7216-

5. Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
Liquid/Solid | 70 - | .5 | 10 - | - | -

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stor
227 lb - 523 - 227 - 30 -

7. DOT shipping name | DOT hazard class | DOT ID cod
Waste Perchlorethylene ORM-A UN1897

8. Describe generation process.
Dry Cleaning

9. ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (Kg)	Amount on site on first day (Kg)	Amount on site on last day (Kg)
1988	523	0	0

	Amount Handled	Handled On Site?	TSDF handling/Waste management methods
A	523	Y N	T-63
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
a. Reformulation/redesign of product a( ) g. Substituting raw materials g(
b. In process recycling. . . . . b( ) h. Improved operations. . . . h(
c. Equipment/technology modification c( ) i. No effort. . . . . i(

d. Other - explain below: . . . . . g(X)

Safety Kleen

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ) | Amt. of Reduction (Kg)

FEB 08 1989 DIV. OF SW

Hazardous Waste Stream Report - Back JAN 06,

See full instructions for form PH-2022 for additional information and codes.

Organization's name. | EPA ID CODI
DISSEM ENTERPRISES INC | TND 98-216-171

Waste name. | Waste stream
Waste Perchlorethylene * 1

12. Chemical Characteristics. | Concentration units. For EP toxic
pH | Flash point | Reactive code | wastes, indicate PPM.
NA None

Major and hazardous consituents. | lower | upper
Perchlorethylene 10 50
Paper, Metal, Carbon, Clay, Dirt + Water 50 90

13. If this waste is recovered, reclaimed, recycled, or reused, describe how

Safety Kleen

16. I certify that this information is true, accurate and complete.
SIGNATURE| (Generator or authorized representative), title and date.

X [signature] President X 2-22-89

Below is for department use only.

17. Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
2-28-89	Yes No	Yes No	Yes No	Yes No	LEJ

Status| Not hazardous (1); Demonstrated not hazardous (2); Status Report
Small generator (3); Resource recovery (4); 4 V
Partial exemption (5);Hazardous (6);
Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastse (R).

18. Comments.

1. Organization's full name at facility.	EPA identification code
Disser Enterprises Inc.	TND982161788

2. Waste name. Use standard name from regulations whenever possible.	Waste Stream number
Waste Perchlorethylene (Still Bottom)	2

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Frequency of generation
1987		(Continuous) Accidental/ One time Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e) Other toxic (f)	EPA waste codes. (Primary first)	SIC code for generating process.
	F002	7216

5. Physical form	Percent solid	Percent water	Vol. to wt. conversion (pounds per gallon)	If used for fuel, chlorine content PPM	BTU per pound /lb.
3 liquid/solid	10%	.5%	10		

6. Generation rates. Supply all rates in kilograms. Monthly maximum	Annual average	Maximum amount stored on site	Maximum days stored
91 (kg)	159 (kg)	91 (kg)	30

7. DOT shipping name	DOT hazard class	DOT ID code
Waste Perchlorethylene	ORM-A 12	UN1897

8. Describe generation process.

Dry cleaning

*** ANNUAL REPORT SECTION *** Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off site, also submit Annual Shipping Report for hazardous waste generators. For handling in a permitted facility, use "T", "S", or "D" codes from instructions. For other handling, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on site on first day of year (kg)	Amount on site on last day of year (kg)
1988	159	0	0

	Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods		Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods
a	159 KG	Y/N	T63	b			
c				d			

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

a. Reformulation/redesign of product . a( )
b. In process recycling . . . . . b( )
c. Equipment/technology modification . c( )
d. Substituting raw materials . . . d( )
e. Improved operations . . . . . e( )
f. No effort . . . . . f( )
g. Other - explain below: . . . . . g( )

Safety Kleen

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to the previous year.

Amount of Reduction (kg)

a. Increased toxicity-a( ), b. decreased toxicity-b( ), c. No change-c( )

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. Organization's full, legal name ~~DISSER ENTERPRISES, INC.~~			Installation identification no. TND 98-216-1788	
2. Mailing address 6629 ELLESMERE RD	City NASHVILLE	State TN	Zip code 37205	
3 a. Site address HWY 46, DICKSON, TN 37055	City Dickson	State TN	Zip code 37055	County name Dickson
b. Latitude (degrees, minutes & seconds) 00.0000	Longitude (degrees, minutes & seconds) 00.0000			
4. Owner name (may be corporation or company name) WASHLAND EXECUTIVE CLEANERS		Type	Phone with area code (615) 446-5817	
5. Manager or operator name EUNICE LOVELL		Type	Phone with area code (615) 446-5817	
6. Principal technical contact PHIL DISSER	FAX number + area code ~~(615) 356-1459~~ 615-352-4635		Phone with area code (615) 356-9443	
7. Number of employees 8	Year operation began 1987	~~SIC codes (Primary SIC~~ first,etc.) 7216, , .		Job shop Yes No ( )

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	PHIL DISSER	24 HRS	(615) 297-6871
b.	SCOTT MITCHELL	24 HRS	(615) 446-2437
c.			
d.			

9. a. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ) No (✓)
b. Do you recycle RCRA hazardous waste from onsite? Yes( ) No ( )

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
[signature]	President	2-15-99

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
02/25/1999	22		N	N	Y

12. Date closed	TSDR status	Transporter status	

13. Comments

RECEIVED
DIV SOLID WASTE MGT
FEB 25 1999

Group no. RDA 2203

ID No.

CN-0909(Rev.11/98)

Filters

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility: DISSER ENTERPRISES, INC.
   Installation identification number: TND 98-216-1788

2. **Waste name.** Use standard name from regulations whenever possible.: WASTE PERCHLORETHYLENE FILTERS
   WASTE STREAM NUMBER: 1

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.: 1987
   Date no longer generated. (MM/DD/YY):
   Annual **Frequency** of generation: Continuous ____ Accidental/ One time ____ Various (c)

4. Circle all appropriate **hazard criteria.** Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). F
   EPA waste codes. (Primary first; six maximum.): F002
   SIC code for generating process.: 7216,

5. **Physical form** code: Sld:Othr (9)

% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
70.0	.5	10.000	0.0	0.0

6. **Generation rates** in kilograms.

Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
21.9	~~263.6~~ 218.1847	72.7	30

7. **DOT shipping** name: WASTE PERCHLORETHYLENE
   DOT hazard class: Misc Haz. Mat 09
   DOT ID code: UN1897

8. Describe the **generation process.**

   FROM RECYCLING PERK USED IN DRY CLEANING EQUIPMENT. DRY CLEANING

9. **Chemical Characteristics.**
   pH:
   Flash point:
   Reactive code:
   Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )

Hazardous constituents. Give range of values at right.	lower value	upper value
A. PERCHLORETHYLENE	10	50
B. PAPER, METAL, CARBON, CLAY, DIRT & WATER	50	90
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

T63

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DIV SOLID WASTE MGT
FEB 2 5 1999

CN-0773 (Rev. 11/95)

Form Continues on the Back

Group No. ____ File No. RDA 2203 and 2497
ID No. ____
4(Y)

still Bottoms

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility DISSER ENTERPRISES, INC.	**Installation identification number** TND 98-216-1788
2. **Waste name.** Use standard name from regulations whenever possible. WASTE PERCHLORETHYLENE (STILL BOTTOM)	WASTE STREAM NUMBER 2

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation
1987		Continuous ____ Accidental/ One time. Various (C)

4. Circle all appropriate **hazard criteria.** Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA **waste codes.** (Primary first; six maximum.)	**SIC code** for generating process.
F	F002	7216.

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	10.0	.5	10.000	0.0	0.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
34.0	~~409.0~~ 336.36	136.3	30

7. **DOT shipping** name	DOT hazard class		DOT ID code
WASTE PERCHLORETHYLENE	Misc Haz. Mat	09	UN1897

8. Describe the **generation process.**

DRY CLEANING

9. **Chemical Characteristics.**

pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) ( )

Hazardous constituents. Give range of values at right.	lower value	upper value
A. PERCHLORETHYLEN	10	50
B. PAPER, METAL, CARBON, CLAY, DIRT, WATER	50	90
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

Use Waste Co. To haul off

T63

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DIV SOLID WASTE MGT
FEB 25 1999

Group No. ____ File to ____
RDA 2203 and 2497
ID No. ____

CN-0773 (Rev. 11/95)

Form Continues on the Back

4(Y)

TND-98-216-1788

For wastes shipped offsite only.

1998 Offsite Shipping Report

Page 1 of 1

TNB -98- 216-1788 YY - -

FO

A EXECUTIVE CLEANERS
Attn: PHILIP DISSER
6629 ELLESMERE RD
NASHVILLE, TN 37205

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Flor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2. Waste Streams or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility Installation ID	Transporter Installation ID	TSDR Handling Codes
a. 1	waste filters	5002	218.18	4	GAD 981269095	GAD 981269095	T-63-501
b. 2	waste sludge	5-002	336.36	4	GAD 981269095	GAD 981269095	T-63-501
c.							
d.							
e.							
f.							
g.							
h.							

3. Totals: Sum the two columns to the right.
Page totals: sum the following two columns
Final totals: sum all page totals on last page of report

554.54	8	

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date)

shipped at same time 4+4=7

President

2-15-99

RECEIVED
DIV SOLID WASTE MGT
FEB 25 1999

Group No.
File No.

DISSER ENTERPRISES, INC.

31251

31251

DATE
02/22/99

AMOUNT
**550.00

FOR: TNR 00-000-0083

RECEIVED
DIV SOLID WASTE MGT

FEB 25 1999

Group No._____ File No._____

ID No._____

1998 Hazardous Waste Generator Maintenance Fees

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville TN 37243-1535

INSTRUCTIONS

Complete the following to determine if you owe the hazardous waste maintenance fee for generators. Return the certified form even if no fees are due.

1.1	Enter the number of months in 1997 that you generated more than 100 but less than 1000 kilograms of hazardous waste.	6
1.2	If you are a Conditionally Exempt Small Quanity Generator (CESQG), enter the number of months in 1997 that you accumulated at any time more than 1000 kilograms of non-acute hazardous waste.	- 0 -
1.3	Enter the number of months in 1997 that you generated 1,000 or more kilograms of hazardous waste.	- 0 -
1.4	Enter the number of months is 1997 that you generated 1 or more kilograms of acute hazardous waste, or 100 or more kilograms of a spill or residue of acute hazardous waste.	- 0 -
1.5	If you are a CESQG, enter one (1) if you received a Notice of Violation in 1997, other than for over-accumulation as expressed in line in 1.2 above.	- 0 -

Note: Wastes generated from the cleanup or containment of a Superfund site or a spill on public property shall be excluded from the above for the fee calculations only. Also, exlcuded are wastes listed under 1200-1-11.02(1)(c)(ii) or 40 CFR 261.5 (c) & (d), incorporated by reference in 1200-1-11.02(1)(a). For examples, wastes handled as H03, H05, H06 and H07; fly ash, drilling fluids, and cement kiln dusts; and still bottoms recycled onsite as long as the waste recycled has been counted once.

If all lines above are zero, you owe no fee. Enter zero on line 1 below and certify on line 2.

If either line 1.1 or 1.2 is greater than zero, and all lines 1.3 to 1.5 are zero, your are considered a small quantity generator for fee purposes. Enter $550 on line 1 below and certify on line 2.

If any line 1.3 to 1.5 is greater than zero, you are considered a large quantity generator for fee purposes. Enter $900 on line 1 below and certify on line 2.

Enter Name and Installation ID:

TND-98-216-1755
~~TNP-10-000-0022~~ Nashville TN
Disser Enterprises, Inc. DBA
~~EXECUTIVE CLEANERS~~ Nashville cleaners
ATTN: PHILLIP DISSER
5520 FLEGHERL RD
NASHVILLE, TN 37205

Please complete and return the original to the above address.

For technical assistance, call 1-(800) 237-7018 (in Tennessee only)

1. See the instructions to determine if you owe a hazardous waste generator maintenance fee. If you are a large quantity generator, enter $900. If you are a small quantity generator, enter $550. Else, enter zero. Submit the completed form with your check or money order payable to Treasurer, State of Tennessee. Do not send cash. — $550.00

2. Certify that the information given above is true, accurate and complete.

Signature of owner, manager or authorized representative.	Title	Date
Philip Disser	President	2-15-99

Below is for DEPARTMENT USE only.

CD No.	Date received	Amount	Receipt #	Comments
ASW8344		550.00	A09245	RECEIVED DIV SOLID WASTE MGT FEB 2 3 1999 RDA 2203

CN-0906 (Rev. 11/95)

Group No. _____ File No. _____
ID No. _____

22-41

DSWM L&C

NOV 20 21 1986

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

11-21-86 mat

JM A 12-1

file

November 18, 1986

Mr. Billy Williams
Fiberglass Works, Inc.
TND 044526549
Route 7 Box 223
Dickson, TN 37055

SUBJECT: HAZARDOUS WASTE INSPECTION
Tennessee Hazardous Waste Management Act

Dear Mr. Williams:

This letter confirms the observations and recommendations which were made during the Hazardous Waste generator, small quantity exclusion, inspection concerning your facility on November 13, 1986. The attached inspection report verifies that no violations were discovered during the inspection.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 741-0654.

Sincerely,

David Wall
Division of Solid Waste Management

DW/kk/fiberglas.ltr

cc: DSWM - Central Office, Nashville

22-UE SWM &CC

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

January 9, 1987

The Dickson Herald
104 Church St.
Dickson, TN 37055

Attention: Classified Advertising, Legals

Dear Sir:

Please insert the enclosed Public Notice, regarding the tentative decision to grant a variance to Aries Fiberglass Works, Inc., Dickson, in the legal section of your newspaper, for one day only, January 16, 1987, or as soon thereafter as possible.

Upon completion of publishing the Legal Notice, please send three (3) copies each of the invoice, "Proof of Advertisement" statement, and clippings of the Legal Notice to:

Division of Solid Waste Management
Tennessee Department of Health and Environment
Customs House, 4th Floor
701 Broadway
Nashville, Tennessee 37219-5403
Attention: Barbara Blanton
Phone (615) 741-3424

Sincerely,

Barbara Blanton

Barbara Blanton
Division of Solid Waste Management

BJB/ah/SWM-VAR-3/SW-52c

Enclosure

cc: Linda Tidwell
Tom Tiesler
Joe Walkup

JAN 23 2007

See full instructions for form PH-2022 for additional information and code

1. Organization's name.
FIBERGLASS WORKS INC

: EPA ID C
TMD 04-452-

2. Waste name.
SPENT ACETONE

: Waste stre
1

3. Give years this waste has been generated.
3 TO 4 YRS

: Frequency of genera
VARIOUS

4. Mark all appropriate hazard criteria below.
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (d), Other toxic (f)
CODES: A

: EPA waste codes
F003

5. Physical form
OTHER SOLID

: Percent solid
10.0

: Volume to wt. (lb/ga

6. Generation rates in kilograms.
Monthly maximum
800

: Annual average
~~3,400~~ 5000

: Max. amount stored
50

: Max. days st
6 —

7. DOT shipping name
N/A

: DOT hazard class : DOT ID t

8. Describe generation process.
DIRTY ACETONE ~~IS GENERATED FROM FLUSH OUT CHOPPER GUN AND FROM CLEANIN~~
~~HANDS & TOOLS~~ SEE INFO in # 17 on next pg.

9. ANNUAL REPORT SECTION *** Lines 9-11.
If the waste was shipped off-site, also submit Annual Shipping Report
Hazardous Waste Generators. If waste was handled on-site in a permitted
facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H
codes from instructions.

Report Line	Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt method TSDF handling c
9a	4590.	0	0	H09

10. Describe the efforts undertaken to reduce the volume and toxicity in
generation of this waste during the reported year. This reduction refers
generation processes and not treatment methods.

UTILIZING BEST MANAGEMENT PRACTICES ON ACETONE
USAGE. STARTING USING SOLVENT RECOVERY UNIT. IN 19

11. Describe changes in volume and toxicity that those reduction efforts
described in line 10 produced last year compared to previous years since 19

FEB 27 1987

See full instructions for form PH-2022 for additional information and codes.

Organization's name.
FIBERGLASS WORKS INC

: EPA ID CODE
TND 04-452-654

Waste name.
STILL BOTTOMS (FROM ACETONE RECOVERY)

* Waste stream :
2

12. Chemical Characteristics.
pH : Flash point
>140

: Concentration units. For EP to
: wastes, indicate PPM.

Major and hazardous consituents. : lower : upper

NONE

13. Describe handling methods with codes from instructions.

Treatment codes	Storage codes	Disposal codes	Location
—	—	—	OFF-SITE

14. Identify EPA ID code all transporter and TSDF operators involved in handling this waste. N/A

15. I certify that this information is true, accurate and complete.
SIGNATURE: (Generator or authorized representative), title and date.

Billy D. Williams Pres. 1-20-87

==========

ow is for department use only.

Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
2/27/87	(Yes) No	Yes (No)	(Yes) No	Yes (No)	RLG

Status: Not hazardous (1); Demonstrated not hazardous (2);
Small generator (3); Resource recovery (4); Partial exemption (5); 2
Hazardous (6); Accidental (7); No longer generated (8);
Variance granted (9); Conditionally exempt (A).

17. Comments.

CORRECTED 2/25/87 - BG.

DSWM L&C

PUBLIC NOTICE

The Commissioner of the Tennessee Department of Health and Environment is hereby giving notice of this tentative decision to grant a variance from classification as a waste, for spent acetone, Hazardous Waste Code F003, as generated at Aries Fiberglass Works, Inc., Route 7, Colesburg Area in Dickson County, Dickson, Tennessee 37055, because this hazardous material is recycled in a manner which will not pose a significant hazard to public health or the environment. This variance will only apply to the material identified in the request and only when it is managed as described in the request.

Aries Fiberglass Works, Inc. generates spent acetone in their production process. This spent acetone exhibits the hazardous characteristic of ignitability. Aries Fiberglass Works collects their spent acetone and recovers the acetone by an on-site distillation process. The recovered acetone is reused, on-site, as it was used originally.

The procedures for determining that certain hazardous materials that are being recycled will no longer be classified as wastes are provided in Tennessee Rule 1200-1-11-.01(4) Variance from Classification as a Waste.

Comments and/or requests for a hearing on this tentative decision will be accepted for 30 days ending at 4:30 p.m. FEB 16 1987.

Comments or requests for a hearing should be sent to: Mr. Tom Tiesler, Director, Division of Solid Waste Management, Tennessee Department of Health and Environment, Customs House, 4th Floor, 701 Broadway, Nashville, Tennessee 37219-5403; phone (615) 741-3424.

The Commissioner will issue a final decision to either grant or deny the variance after receipt of comments and after the hearing (if any).

If you wish to review the draft variance, or wish further information, please contact: Division of Solid Waste Management Regional Office, Tennessee Department of Health and Environment, Customs House, Room B-01, Nashville, TN 37219-5403; phone (615) 741-0654.

TY/ah/SW-154

Hazardous Waste Stream Report - Front JAN 05, 198

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name
FIBERGLASS WORKS INC

| EPA ID CODE
IND 04-452-5549

2. Waste name
SPENT ACETONE

| Waste stream ID
1

3. Give years waste generated | Date stopped | Frequency of generation
1984- 00-00 CONTINUOUS

RECEIVED FEB 15 1989 DIV

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), RR toxic (b), Corrosive (c),
Reactive (e), Other toxic (d)
CODES | A | F003 | 3732

5. Physical form | % solid | % water | lb./gal | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 100 | 0 | 6.000 | 0 | 0

6. Generation rates in Kilograms
Monthly maximum | Annual average | Max. amount stored | Max. days stored
800 | 5,000 | 50 | 5

7. DOT shipping name | DOT Hazard class | DOT ID code

8. Describe generation process
SPENT SOLVENT IS GENERATED FROM FLUSH OUT CHOPPER GUN AND FROM CLEANING HANDS & TOOLS. FIBERGLASS WORKS PURCHASED AND STARTED USING A SOLVENT RECOVERY UNIT DURING 1985.

9. ANNUAL REPORT SECTION ** LINES 9-11
Report year | Amount generated during year (kg) | Amount on site on first day (kg) | Amount on site on last day (kg)
1988 | 0 | 0 | 0

VARIANCE GRANTED IN 1987

| Amount Handled | Handled On Site? | TSDF Handling/Waste management methods
A | | Y N
B | | Y N
C | | Y N
D | | Y N

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year
a. Reformulation/redesign of product (a) | d. Substituting raw materials (d)
b. In process recycling (b) | e. Improved operations (e)
c. Equipment/technology modification (c) | f. No effort (f)
g. Other - explain below (g)

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year

a. more toxic (a) | b. less toxic (b) | c. No change (c) | Amt of Reduction (kg)

See full instructions for form PH-2022 for additional information and codes.

Organization's name. | EPA ID CODE
FIBERGLASS WORKS INC | TND 04-452-6549

Waste name. | Waste stream I
SPENT ACETONE | 1

12. Chemical Characteristics. | Concentration units. For EP toxic
pH | Flash point | Reactive code | wastes, indicate PPM.

Major and hazardous consituents. | lower | upper

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

ON SITE SOLVENT RECOVERY IN USE. Variance granted Febuary 27, 1987

14. I certify that this information is true, accurate and complete.
SIGNATURE (Generator or authorized representative), title and date.

[illegible signature] V.P. 2-10-89

Below is for department use only.

Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
2-15-89	Yes No	Yes No	Yes No	Yes No	[illegible]

Status: Not hazardous (1); Demonstrated not hazardous (2); Status Report
Small generator (3); Resource recovery (4); #9 #N
Partial exemption (5); Hazardous (6);
Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R).

15. Comments.

RECEIVED
FEB 15 1989
DIV. OF SWM

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

DSWM LC

If this is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name: FIBERGLASS WORKS INC			EPA identification code: TND 04-452-6549	
2. Mailing address: 2111 HIGHWAY 47 EAST	City: DICKSON	State: TN	Zip code: 37055	
3. a. Site address: 2111 HIGHWAY 47 EAST DICKSON TN 37055	City:	State:	Zip code:	County name: Dickson
4. Latitude (degrees, minutes & seconds): 36.0348	Longitude (degrees, minutes & seconds): 87.2100			
5. Owner name (may be corporation or company name): BILLY O WILLIAMS		Type:	Phone with area code: (615) 446-8513	
6. Manager or operator name: MIKE OWYER		Type:	Phone with area code: (615) 446-5095	
7. Principal technical contact: MIKE OWYER	FAX number with area code:		Phone with area code: (615) 446-5095	
8. Number of employees: 13	Year operation began: 1981	SIC codes (Primary SIC first, etc.): 3732,		Job shop ( ) Yes No

9. Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
a. BILLY WILLIAMS	ALLTIME	( ) 446-2433
b. MIKE OWYER	ALLTIME	(615) 792-5715
c.		
d.		

10. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Mike Owyer	O.P	2/5/96

*** Space is for Department use only ***

12. Date received	County code	Priority	Generator	Small Generator	Special states
02-07-1996	22		Yes No	Yes No	

13. Date issued	TSDR status	Transporter status

14. Comments

RECEIVED FEB 07 1996 Solid & Hazardous Waste

CN-0969 Rev. 11/95 RDA 2283

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility FIBERGLASS WORKS INC	EPA identification code TND 04-452-6549
2. Waste name. Use standard name from regulations whenever possible. SPENT ACETONE	WASTE STREAM NUMBER 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1984- 6/30/95	06-30-95	Continuous ___ Accidental/ One time ___ Various (C)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
A	F003	3732

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	10.0	.0	0.000	0.0	0.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
0.0	0.0	0.0	0

7. DOT shipping name	DOT hazard class	DOT ID code
	00	

8. Describe the generation process.

~~SPENT ACETONE IS GENERATED FROM FLUSH OUT CHOPPER GUN AND FROM CLEANING HANDS & TOOLS. FIBERGLASS WORKS PURCHASED A AND STARTED USING A SOLVENT RECOVERY UNIT DURING 1986.~~

NO LONGER GENERATED

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) (C)

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A.		
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

RECEIVED
FEB 07 1996
Div. of Solid & Hazardous Waste

TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT

Ad-A-Bout Campers COMPLIANCE MONITORING AND ENFORCEMENT ACTIVITY REPORT

PM 2430
Rev. 9/85

D NO: TND 000506816 Name: Ad-A-Bout Campers

ES Hwy 70 R1 2 White Bluff Tenn 37187

ROGRAM: Hazardous Waste (H-1) Solid Waste [ ]

EY DATE: (MM-DD-YY) 07-16-86

TYPE OF EVALUATION

EVALUATION INSPECTION 07,16,86 (field visits)	A. FULL CHECKLIST				
	1. HW GEN [1]	3. HW TSDF [3]	6. SW PROCESSING FACILITY [6]		
	2. HW TRANS [2]	4. HW SQ GEN [4]	7. SW LANDFILL [7]		
		5. HW NON-NOT (NN)	8. PART B INSPECTION [8]		
	B. OTHER	1. WALK-THROUGH INSP [1]	5. PART A MODIFICATION/WITHDRAWAL EVAL [5]		
		2. CLOSURE EVAL [2]	6. COMPLAINT FOLLOW-UP NOS [6]		
		3. POST CLOSURE EVAL [3]	7. EMERGENCY RESPONSE [7]		
		4. SPECIAL WASTE EVAL [4]	8. OTHER (describe in comments) [8]		
SAMPLING INSPECTION ___/___/___	1. GENERATED WASTE [1]	3. SOIL/SEDIMENT [3]	5. GROUND WATER [5]	0 SAMPLES	
	2. RECEIVED WASTE [2]	4. SURFACE WATER/LEACHATE [4]	6. AMBIENT AIR [6]		
SPECIAL INSPECTION ___/___/___	1. GROUNDWATER MONITORING [1]	3. PRELIMINARY GEOLOGIC EVALUATION [3]			
	2. OTHER (describe in comments) [2]	4. FINAL GEOLOGIC EVALUATION [4]			
RECORDS/REPORT REVIEW ___/___/___ (permitting) (in office)	1. CLOSURE PLANS WITH COST ESTIMATES [1]	7. MANIFEST REPORTS [7]			
	2. POST CLOSURE PLANS WITH COST ESTIMATE [2]	8. MANIFEST RECORDS [8]			
	3. FINANCIAL INSTRUMENTS [3]	9. GWM DATA [9]			
	4. OTHER REQUIRED PLANS [4]	10. GWM PLANS [10]			
	5. SPECIAL WASTE REQUEST [5]	11. OTHER [11]			
	6. LANDFILL PLANNING ANNUAL REPORT [6]				
FOLLOW-UP EVALUATION ___/___/___	1. WITH FIELD OFFICE PERSONNEL ONLY [1]	3. FIELD VISIT [3]			
	2. WITH CENTRAL OFFICE PERSONNEL [2]	4. RECORD REVIEW [4]			
INCIDENT PROCESSING ___/___/___	1. ORAL COMPLAINT [1]	3. EMERGENCY RESPONSE CALL [3]			
	2. WRITTEN COMPLAINT [2]	4. OTHER (describe in comments) [4]			
MISCELLANEOUS ___/___/___	1. FACILITY STATUS EVALUATION MEETINGS/LETTERS [1]	3. ABORTED INSPECTION [3]			
	2. OTHER (describe in comments) [2]	4. WARNING LETTER [4]			

VIOLATION CODES: NONE (G)

ENFORCEMENT ACTIONS:	DATE ACTION TAKEN	SCHEDULED COMPLIANCE DATE	ACTUAL COMPLIANCE DATE
OTICE OF VIOLATION	___/___/___	___/___/___	___/___/___
OMPLIANCE REVIEW MEETING	___/___/___	___/___/___	___/___/___
EFERRED TO ENFORCEMENT SECTION	___/___/___		

COMMENTS: (continue on reverse if necessary) Company was located at site of cabin builder between White House and Pegram. Out of si 'S. Never manufactured at this site.

KEY OVER [ ]

PREPARED BY: D. WALL | ID CODE: 084 | DATE: 07-18-86 | FIELD OFFICE: Nashville 102

22-0

DSWM L.C C/O

2-25-88 mt

JM A 3-2

RECEIVED
FEB 25 1988
DIV. OF. SWM

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

February 23, 1988

Mr. Gene Miller
Gene's Body Shop
P.O. Box 142
Highway 48
Charlotte, Tennnessee 37036
TND 98 192 6470

SUBJECT: HAZARDOUS WASTE INSPECTION
Tennessee Hazardous Waste Management Act

Dear Mr. Miller:

This letter confirms the observations and recommendations which were made during the Hazardous Waste inspection concerning your facility on February 4, 1988. The attached inspection report verifies that no violations were discovered during the inspection.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 741-0654.

Sincerely,

James R. Spicer
Division of Solid Waste Management

JRS/af

cc: DSWM - Central Office, Nashville

INSPECTION REPORT

SITE/OPERATION INSPECTED:

Gene's Body Shop
P.O. Box 142
Highway 48
Charlotte, Tennessee 37036
IND 98 192 6470

OWNER/OPERATOR/PRIMARY CONTACT:

Gene Miller

DATE AND TIME OF INSPECTION:

February 4, 1988
1:30 p.m.

REPORT PREPARED BY:

James R. Spicer
701 Broadway, B-01
Nashville, Tennessee 37219-5403
(615) 741-0654

NAMES AND AFFILIATIONS OF OTHER INSPECTION PARTICIPANTS:

Gene Miller, Gene's Body Shop

PURPOSE OF INSPECTION:

This routine unscheduled inspection was conducted to evaluate Gene's Body Shop's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee. Requirements pursuant to Rule 1200-1-11-.08 (TSD requirements) were not inspected.

FACILITY DESCRIPTION:

Gene's Body Shop is a small, family operated auto repair shop. Less than reportable quantities (approximately 2 drums/year) are generated from the painting operation. The waste is manifested as F003/F005 waste and is transported by Emergency Response, Incorporated to American Resource Recovery.

DSWM 13,C

Hazardous Waste Stream Report - Front

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name.
GENE'S BODY SHOP

| EPA ID COD
TND 98-192-6

2. Waste name.
WASTE PAINT RELATED MATERIAL, NOS

| Waste stream

3. Give years waste generated | Date stopped | Frequency of generation
1977 / / CONTINUOUS

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| A |D001 |

5. Physical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb
LIQUID, OTHER BASED | 005.0| |0008.50D | |

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days sto
45 ~~200~~ 513 ~~4,800~~ ~~600~~ 250 180 90

7. DOT shipping name | DOT hazard class | DOT ID co
WASTE PAINT RELATED MATERIAL, NOS FLAMMABLE LIQUID

8. Describe generation process.
AUTO BODY PAINTING.

9. ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (kg.)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987	513	150	150

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	513	Y N	T-C3
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
a. Reformulation/redesign of product a( ) d. Substituting raw materials
b. In process recycling . . . . . b( ) e. Improved operations. . . .
c. Equipment/technology modification c( ) f. No effort. . . . . .
g. Other - explain below: . . . . . g(✓)

Small quantity generator

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

Hazardous Waste Stream Report - Back DEC 31, 19

See full instructions for form PH-2022 for additional information and codes.

Organization's name. | EPA ID CODE.
GENE'S BODY SHOP | TMD 98-192-6470

Waste name. * Waste stream ID
WASTE PAINT RELATED MATERIAL, NOS 1

12. Chemical Characteristics. | Concentration units. For EP toxic
PH | Flash point| Reactive code | wastes, indicate PPM.

Major and hazardous consituents.	lower	upper
A METHYL ISOBUTYL KETONE	25	
B TOLUENE	30	
C XYLENE	30	
D METHYL ETHYL KETONE	10	
E PAINT SLUDGE	5	

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.
Recycled or fuel blended,

16. I certify that this information is true, accurate and complete.
SIGNATURE| (Generator or authorized representative), title and date.

[illegible] owner 6/27/88

Below is for department use only.

17. Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
6-28-88	Yes No	Yes No	Yes No	Yes No	Zej

Status| Not hazardous (1); Demonstrated not hazardous (2); Status Report
Small generator (3); Resource recovery (4); A Y N
Partial exemption (5);Hazardous (6); 6
Incidental (7); No longer generated (8);
Variance granted (9); Conditionally exempt (A);
Mixed radiological wastes (R).

18. Comments.

RECEIVED
JUN 28 1988
DIV. OF SWM

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name: GENE'S BODY SHOP			EPA identification code: TND 98-192-6470	
2. Mailing address: PO BOX 139	City: CHARLOTTE	State: TN	Zip code: 37036	
3 a. Site address: 3604 HIGHWAY 48, CHARLOTTE, TN 37036	City:	State:	Zip code:	County name: Dickson
b. Latitude (degrees, minutes & seconds): 00.0000	Longitude (degrees, minutes & seconds): 00.0000			
4. Owner name: GENE MILLER		Type:	Phone with area code: (615) 789-4037	
5. Manager or operator name: GENE MILLER		Type:	Phone with area code: (615) 789-4037	
6. Principal technical contact: GENE MILLER			Phone with area code: (615) 789-4037	
7. Number of employees: 1	Year operation began: 1977	SIC codes (Primary SIC first, etc.): 7531, , ,	Job shop: Yes No (✓)	

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	GENE MILLER	WK	(615) 789-4037
b.	GENE MILLER	AM	(615) 789-5649
c.			
d.			

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. For a range of related permits, give the first and last permit number.

10. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No (✓)

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Gene C. Miller	Owner	2/11/95

*** Below for Department use only ***

12. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
02-23-1995	22		N	N	Y

13. Date closed	Date registered	Date delegated

14. Comments

RECEIVED
FEB 23 1995

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management,
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility.
   GENE'S BODY SHOP

   EPA identification code
   TND 98-192-6470

2. Waste name. Use standard name from regulations whenever possible.
   WASTE PAINT RELATED MATERIAL, NOS

   Waste Stream number
   1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.
   1977

   Date no longer generated. (MM/DD/YY)

   Frequency of generation (C)
   Continuous ____ Accidental/ One time ____ Various ____

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g) A

   EPA waste codes. (Primary first; six maximum.)
   D001, , , , ,

   SIC code for generating process.
   .

5. Physical form: *Liq-Othr (3)*
   % Solid: *5.0*
   % Water: *.0*
   Vol. to wt. conversion (pounds/gallon): *8.500*
   If used for fuel, chlorine content (PPM): *0.0*
   BTU per pound: *0.0*

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): *43.0*
   Annual average (kg): *513.0*
   Maximum amount stored on-site (kg): *257.0*
   Maximum days stored: *180*

7. DOT shipping name
   WASTE PAINT RELATED MATERIAL, NOS

   DOT hazard class: *Flam. liquid* 07

   DOT ID code: *1289*

8. Describe generation process.
   AUTO BODY PAINTING.

9. Chemical Characteristics.
   pH:
   Flash point:
   Reactive code:
   Concentration units. For EP toxic and TCLP wastes, use PPM.
   % volume( ), % weight( ), PPM( ) ( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. *METHYL ISOBUTYL KETONE*	25	
b. *TOLUENE*	30	
c. *XYLENE*	30	
d. *METHYL ETHYL KETONE*	10	
e. *PAINT SLUDGE*	5	

10. If this waste is recovered, reclaimed, recycled or reused, describe how.
    RECYCLED OR FUEL BLENDED

DSWM 0 C

RECEIVED SOLID WASTE MGT FEB 24 2000

Conditionally Exempt Small Quantity Generators (CESQG)
1999 Annual Reports of Hazardous Waste Activities

Tennesseee Department of Environment and Conservation; Division of Solid Waste Management;
Fifth Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535

Although Conditionally Exempt Small Quantity Generators (CESQG) are not required to file an annual report or to pay maintenance fees, you must maintain notification of your current status with the Division. Complete the following to determine your status.

1. Enter the amount of hazardous waste in kilograms that you generated in 1999. 1025
2. Enter the number of months in 1999 that you generated more than 100 but less than 1000 kilograms of hazardous waste. 0
3. If you are a Conditionally Exempt Small Quantity Generator (CESQG), enter the number of months in 1999 that you accumulated at any time more than 1000 kilograms of non-acute hazardous waste. 0
4. Enter the number of months in 1999 that you generated 1,000 or more kilograms of hazardous waste. 0
5. Enter the number of months is 1999 that you generated 1 or more kilograms of acute hazardous waste, or 100 or more kilograms of a spill or residue of acute hazardous waste. 0
6. If you are a CESQG, enter one (1) if you received a Notice of Violation in 1999, other than for over-accumulation expressed in line 3 above. N/A

(Note: The waste generated from the cleanup or containment of a Superfund site or from the cleanup of a spill on public property shall be excluded from the above. Also, excluded are wastes listed under 1200-1-11-.02(1)(c)(ii) or 40 CFR 261.5 (c) & (d), incorporated by reference in 1200-1-11-.02(1)(a). For examples, wastes handled as H03, H05, H06 and H07; fly ash, drilling fluids, and cement kiln dusts; and still bottoms recycled onsite as long as the waste recycled has been counted once.

If all lines 1 to 6 are zero and you do not plan to generate any hazardous waste in the future, certify and submit this form along with a revised notification and hazardous waste stream report(s).

If lines 2 to 5 are all zero, you are still a conditionally exempt small quantity generator. Certify below and fold, tape and mail this page as it is the only response you need to make. Do not staple.

If line 2 or 3 is greater than zero, and all lines 4 to 6 are equal to zero, you have changed status and are now a small quantity generator. Call the Division to obtain notification, waste stream descriptions, annual report and fee forms.

If any line 4 to 6 is greater than zero, you have changed status and are now a large quantity generator. Call the Division to obtain notification, waste stream descriptions, annual report and fee forms.

Certify this form below and return it along with the revised notification, completed annual report and fee forms. If you need to report any new wastes other than those on the enclosed computer printed forms, call the Division to obtain the annual report forms.

The annual report is due in this office or must be postmarked no later than March 1, 2000. A metered or franked imprint is not acceptable as a postmark. Under current policy, a person is subject to a penalty of up to $2,000 per month for late annual reports. A late fee penalty of 5% compounded monthly will be assessed in addition to statutory interest at the rate of 10% per annum on the fee due.

If, after reviewing these forms and instructions, you require assistance, please contact the Division. You may call 1-800-237-7018 from inside Tennessee anytime, 24 hours per day, and leave your name, phone number, Installation ID, date called and questions. From outside Tennessee, call (615) 532-0878 from 8:00 A.M. to 4:00 P.M. CST. Someone will contact you as soon as possible to offer assistance.

J Mapa
Director of Solid Waste Management

TND 98-192-6470 NNY- - Nashville EAC

GENE'S BODY SHOP
Attn: GENE MILLER
PO BOX 159
CHARLOTTE, TN 37036

Please complete and return the original.

For technical assistance, call 1-(800) 237-7018 (in Tennessee only.)

Certify that the information given is true, accurate and complete by an authorized representative of the site.

Signature of owner, manager or authorized representative.	Title	Date
Gene F Miller	Owner	2-22-00

CN-0908 (Rev. 11/95) RDA 2203

DSWM I&C

Trichloro tetrachloro

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name GRAHAM FORD LINCOLN MERCURY			Installation identification number TND 98-778-8247
2. Mailing address HWY 46A BOX 516	City DICKSON	State TN	Zip code 37055
3 a. Site address HWY 46A, DICKSON, TN 37055	City	State	Zip code / County name Dickson
b. Latitude (degrees, minutes & seconds) 36.0325	Longitude (degrees, minutes & seconds) 87.2230		
4. Owner name (may be corporation or company name) BILL GRAHAM		Type	Phone with area code (615) 446-2308
5. Manager or operator name ~~R W CURTIS~~ Thomas M. Cude		Type	Phone with area code (615) 446-2308
6. Principal technical contact ~~R W CURTIS~~ Thomas M. Cude	FAX number with area code (615) 441-1396		Phone with area code (615) 446-2308
7. Number of employees 42	~~Year operation began~~ 1992	SIC codes (Primary SIC first, etc.) 5511, , ,	Job shop Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	JOHN GRAHAM	24 HRS	(615) 446-2308
b.	R W CURTIS	24 HRS	(615) 446-2308
c.			
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( )

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
x Thomas M. Cude	x Service Manager	x 2-27-98

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
03/03/1998	22		Yes No y	Yes No y	

12. Date closed	TSDR status	Transporter status

13. Comments ~~[illegible]~~ SEE ATTACHED ANNUAL hazardous WAST REPORT PENALTY POLICY

RECEIVED

MAR 03 1998

Div. of Solid & Hazardous Waste

CN-0909(Rev.11/95) RDA 2203

Hazardous Waste Notification

INSTRUCTIONS FOR COMPUTER GENERATED AND BLANK FORMS

Below are instructions for Hazardous Waste Notification. For previous notification, review the data and mark any changes on the computer generated form. If you need extra copies, please photocopy the blank form before writing on it.

Complete this form for each site generating a hazardous waste in Tennessee. If a company owns multiple sites, describe each site and its wastes on a separate set of forms. Rule 1200-1-11-.01(2)(a) provides a definition of "onsite". Rule 1200-1-11-.03(1)(b) gives the procedures to determine if a waste is hazardous. Attach a completed Hazardous Waste Stream Report for each waste stream determined to be hazardous.

Each new generator of hazardous waste must submit this form within 90 days after the date of initial generation. Each generator is responsible for maintaining an up-to-date form by notifying the Division within 30 days of significant changes. Submit one copy of the applicable forms to the Division of Solid Waste Management, Fifth Floor, L & C Tower, 401 Church Street, Nashville, Tennessee 37243-1535.

Line 1: **Organization name** - Give the organization's full, legal name for this site to distinguish it from any other site the organization may own or operate in Tennessee. Supply your installation identification number. If no number is available, call the Division for instructions on how to obtain one. There is now a one-time application fee of $50.00 for a new number.

Line 2: **Mailing address** - Give a complete mailing address with zip code according to U. S. Postal Service standards for this site. Give the state code of TN for Tennessee or the two character postal abbreviation for any other state. Please supply the full 9 digit zip code if possible. Mail will be sent to the technical contact if supplied on line 6. This address will be used to mail the annual hazardous waste report forms. Carefully consider who should receive the mail and where it should be delivered to insure prompt delivery before any late penalties are assessed.

Line 3: **Site Address** - Give the full address which will aid the Division in going to this site. Do not give a P. O. Box number. Give the Tennessee county name in which the site is located. Give the latitude and longitude of the site by degrees, minutes and seconds. Latitude and longitude may be found by using U. S. Geologic Survey quadrangle maps.

Line 4: **Owner name** - Give the personal or corporate name and phone number of the immediate owner of the site. In Type, enter one of the following codes which best describes the owner type:

Private . . .	P	Indian . . .	I
Federal government . .	F	Municipal government . . .	M
State government . . .	S	Special District . . .	D
County government . . .	C	Other . . .	O

Line 5: **Manager name** - Give the name and phone number of the manager or person who is responsible for the direction of activities at the site. In Type, use the codes from line 4 above which best describes the manager type.

Line 6: Principal **technical contact** - Give the name and fax and phone number of the person who is knowledgeable about the hazardous waste generated at this site and who the Division may contact for further information if needed. The blank annual report package from the Division will be addressed to this person.

Line 7: Give the **number of employees** at this site. Enter the **year that operations began** at the site. Enter the four digit **primary Standard Industrial Classification** (SIC) code of the site. If additional SIC codes are known, please supply them. If your site operates as a job shop, as described in Rule 1200-1-11-.03(2)(e), circle "Yes" in the box with the caption "Job Shop".

Line 8: **Emergency contact** - Give the name, phone number and time the designated emergency contact may be called. The Division must be able to call 24 hours per day and 7 days per week regarding emergencies. Only one person should be designated for any time period. Enter only one phone number per line. If additional space is needed, attach a separate sheet and identify the information with the form name and line number.

Line 9: Check the yes box if you **receive hazardous waste from offsite and recycle it.**

Line 10: **Certification** - After all documents have been compiled for submission to the Division, the manager or owner responsible for the site must sign, give their title and the date signed. The certification must be made by one who is authorized to legally bind the company as when signing contracts.

Lines 11 to 13 are for **Department use only!**

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility GRAHAM FORD LINCOLN MERCURY	**Installation identification number** TND 98-778-8247
2. **Waste name.** Use standard name from regulations whenever possible. RQ WASTE PETROLEUM NAPHTHA	WASTE STREAM NUMBER 1

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-. 1985-	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation Continuous ___ Accidental/ One time ___ Various (C)
4. Circle all appropriate **hazard criteria** below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g) AB	EPA **waste codes**. (Primary first; six maximum.) D001,D018,D039,D035,D006,D008	SIC code for generating process. 5511,

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	<1	<1	6.700	0.0	14,000.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
~~570~~ 7070	~~353.2~~ 286.2	0.0	0

7. **DOT shipping** name	DOT hazard class		DOT ID code
WASTE PETROLEUM NAPHTHA	ORM-D	10	UN1255

8. Describe the **generation process**.
PARTS CLEANING & DEGREASING

9. **Chemical Characteristics.** pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) (V)
7	105		X

Hazardous constituents. Give range of values at right.	lower value	upper value
A. MINERAL SPIRITS	80	99
B.		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

S02/T65

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MAR 23 1998
Div. of
Solid & Hazardous Waste

4(Y)

11. Annual Generation and Handling Data: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year	A. Amount generated during year (kg)	B. Amount onsite Jan. 1 in temp. storage (kg)	C. Amount onsite Dec. 31 in temp. storage (kg)	D. Amount handled (kg)
1997	286.2			

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

D1	Total Handled OFFsite 286.2 kg	TSDR handling/Waste management methods S02 / T63	D2	Amount Handled ONsite kg	TSDR handling/Waste management methods
D3	Amount Handled ONsite kg	TSDR handling/Waste management methods	D4	Amount Handled ONsite kg	TSDR handling/Waste management methods

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.

13. Identify the **efforts** undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product (A)
B. In process recycling (B)
C. Equipment/technology modification (C)
D. Substituting raw materials (D)
E. Improved operations (E)
F. Reduction research/planning (R)
G. No effort (F)
H. Other - briefly explain here (G)

14. Rate the **helpfulness** of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance A(No NA Yes)
B. Technical feasibility B(No NA Yes)
C. Economic practicality C(No NA Yes)
D. Measurement/accounting methods D(No NA Yes)
E. TN hazardous waste regulations E(No NA Yes)
F. Implementation experience F(No NA Yes)
G. High costs of haz. waste mgt G(No NA Yes)
H. Accidental generation H(No NA Yes)
I. Other - describe here: I(No NA Yes)

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
x Thomas M. Cude	x Service Manager	x 2-27-98

*** Below is for Department use only. **

17. Date received (MM/DD/YY)	Complete?	Test results?	Reasonable?	Follow-up	Initials
03/03/1998		Yes No	Yes No	Yes No	Yes No DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological Corrective Action (C); Waste wastes (R); water Rx (W), Universal Waste (U)	Status	Further Reporting

18. Comments.

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility GRAHAM FORD LINCOLN MERCURY	**Installation identification number** TND 98-778-8247
2. **Waste name.** Use standard name from regulations whenever possible. WASTE COMBUSTIBLE LIQUID NOS (PETROLEUM NAPHTHA)	WASTE STREAM NUMBER 3

3. Give the **years** that this waste has been generated. e.g. 1975, 1982-. 1995-	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation Continuous ___ Accidental/ One time ___ Various (C)
4. Circle all appropriate **hazard criteria** below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g) AG	**EPA waste codes.** (Primary first; six maximum.) D008, D018, D039, D040	**SIC code** for generating process. 5511,

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	2.5	.5	6.700	0.0	5,000.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
~~91.1~~ 73.0	~~298.4~~ 134.0	0.0	0

7. **DOT shipping name**	DOT hazard class		DOT ID code
WASTE COMBUSTIBLE LIQUID NOS (PETROLEUM NAPHTHA)	Flam/Comb Liquids	03	NA1993

8. Describe the **generation process**.
PARTS DEGEASER FOR AUTOMOTIVE REPAIRS.

9. **Chemical Characteristics.**

pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM(X) (P)
5.26-	>140F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. LEAD	3.53	14.41
B. BENZENE	.14	41.4
C. TETRACHLOROETHYLENE	.11	2810
D. TRICHLOROETHYLENE	.1	45.6
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

S02/T63

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Div. of Solid & Hazardous Waste

4(Y)

11. Annual Generation and Handling Data: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year	A. Amount generated during year (kg)	B. Amount onsite Jan. 1 in temp. storage (kg)	C. Amount onsite Dec. 31 in temp. storage (kg)	D. Amount handled (kg)
1997	134.0			

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes:

D1	Total Handled OFFsite 134.0 kg	TSDR handling/Waste management methods S02/T63	D2	Amount Handled ONsite kg	TSDR handling/Waste management methods
D3	Amount Handled ONsite kg	TSDR handling/Waste management methods	D4	Amount Handled ONsite kg	TSDR handling/Waste management methods

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item; service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.

13. Identify the **efforts** undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product (A)
B. In process recycling (B)
C. Equipment/technology modification (C)
D. Substituting raw materials (D)
E. Improved operations (E)
F. Reduction research/planning (R)
G. No effort (F)
H. Other - briefly explain here (G)

14. Rate the **helpfulness** of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance A(No NA Yes)
B. Technical feasibility B(No NA Yes)
C. Economic practicality C(No NA Yes)
D. Measurement/accounting methods D(No NA Yes)
E. TN hazardous waste regulations E(No NA Yes)
F. Implementation experience F(No NA Yes)
G. High costs of haz. waste mgt G(No NA Yes)
H. Accidental generation H(No NA Yes)
I. Other - describe here: I (No NA Yes)

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
X Thomas M. Cu	X Service Manager	X 2-27-98

** Below is for Department use only. **

17. Date received (MM/DD/YY)	Complete?	Test results?	Reasonable?	Follow-up	Initials
03/03/1998		Yes No	Yes No	Yes No	Yes No DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological Corrective Action (C); Waste wastes (R); water Rx (W), Universal Waste (U)	Status	Further Reporting

18. Comments.

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility GRAHAM FORD LINCOLN MERCURY	**Installation identification number** TND 98-778-8247
2. **Waste name.** Use standard name from regulations whenever possible. AQUEOUS BRAKE CLEANER	WASTE STREAM NUMBER 4

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1995-	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation Continuous ____ Accidental/ One time ____ Various (C)
4. Circle all appropriate **hazard criteria** below: Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g) b	EPA **waste codes**. (Primary first; six maximum.) D006,D039	**SIC code** for generating process. 7538,

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Watr (2)	.5	98	8.600	0.0	0.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
~~31.2~~ 27.3	~~89.9~~ 70.3	0.0	0

7. **DOT shipping** name	DOT hazard class		DOT ID code
HAZARDOUS WASTE LIQUID NOS	Misc Haz. Mat	09	NA3082

8. Describe the **generation process**.

9. **Chemical Characteristics.**

pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) X (P)
	140F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. TETRACHLOROETHYLENE	.11	952
B. CADMIUM	.96	6.92
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

S01 / T23, 40, 67

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11. Annual Generation and Handling Data: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year 1997	A. Amount generated during year (kg)	B. Amount onsite Jan. 1 in temp. storage (kg)	C. Amount onsite Dec. 31 in temp. storage (kg)	D. Amount handled (kg)
	70.3			

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

D1	Total Handled OFFsite 70.3 kg	TSDR handling/Waste management methods 501/T23, 40,67	D2	Amount Handled ONsite kg	TSDR handling/Waste management methods
D3	Amount Handled ONsite kg	TSDR handling/Waste management methods	D4	Amount Handled ONsite kg	TSDR handling/Waste management methods

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.

13. Identify the **efforts** undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product (A)
B. In process recycling (B)
C. Equipment/technology modification (C)
D. Substituting raw materials (D)
E. Improved operations (E)
F. Reduction research/planning (R)
G. No effort (F)
H. Other - briefly explain here (G)

14. Rate the **helpfulness** of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance A(No NA Yes)
B. Technical feasibility B(No NA Yes)
C. Economic practicality C(No NA Yes)
D. Measurement/accounting methods D(No NA Yes)
E. TN hazardous waste regulations E(No NA Yes)
F. Implementation experience F(No NA Yes)
G. High costs of haz. waste mgt G(No NA Yes)
H. Accidental generation H(No NA Yes)
I. Other - describe here: I (No NA Yes)

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
X	X	X

*** Below is for Department use only. **********

17. Date received (MM/DD/YY)	Complete?	Test results? Yes No	Reasonable? Yes No	Follow-up Yes No	Initials Yes No
03/03/1998					DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A), Mixed radiological Corrective Action (C); Waste wastes (R); water Rx (W), Universal Waste (U)

Status	Further Reporting

18. Comments.

For wastes shipped offsite only.

1997 Offsite Shipping Report

Page 1 of 1

TND 98-778-8247 YY - - Nashville FO

1. GRAHAM FORD LINCOLN MERCURY
Attn: ~~R W CURTIS~~ Thomas M. Cude
HWY 46A BOX 516
DICKSON, TN 37055

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2 Waste Streams or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility Installation ID	Transporter Installation ID	TSDR Handling Codes
a. 1	RQ waste Petroleum Naphtha	D001, D008, D039, D035, F006, D003	286.2	5	TND981474125	ILD984908202	S02
b. 3	waste Combustible Liquid NOS	D008, D018, D039, D040	134.0	2	TND981474125	ILD984908202	S02
c. 4	Aqueous Brake Cleaner	D006, D039	70.3	3	SCD077995488	ILD984908202	S01
d.							
e.							
f.							
g.							
h.							
3. Totals: Sum the two columns to the right. Page totals: sum the following two columns. Final totals: sum all page totals on last page of report			490.5	10			

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

X Thomas M. Cude

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Div. of
Solid & Hazardous Waste

CN-0779 (Rev. 11/94)

RDA 2203

1997 Offsite Shipping Report

For wastes shipped offsite only.

INSTRUCTIONS

Summarize your **offsite** shipments of hazardous wastes in 1997. This information must be obtained from, and accountable to, your hazardous waste manifest copies returned by the TSDR. You and your TSDR must reconcile any manifest differences and report only the mutually corrected amounts or else file manifest discrepancy reports. Document the reasons for any corrections by using TSDR analyses, actual weights from scale receipts, manifest changes, etc.

Complete one line for each combination of initial transporter and TSDR who handled a waste. If no shipments at all were initiated in 1997, write "No Shipments" in the DOT Shipping Name of line 2a and certify the report. If some wastes were shipped offsite, but others were not, omit those that were not shipped offsite.

Page _____ **of** ____ - Number each page in the space provided on the upper right side of the report.

Waste Streams or "FS" - Enter the source of the waste as the waste stream number from your Hazardous Waste Stream Report forms. For mixtures, enter as many numbers as appropriate. If the waste is being shipped directly from your RCRA permitted storage, enter "FS" (From Storage).

DOT shipping name/waste name - Enter only one of either the DOT shipping name or a descriptive waste name. Enter each different waste or waste combination on a separate line. Enter various mixtures of the same constituent wastes on the same line unless the hazard characteristics of the resultant mixtures are different.

EPA waste codes - Enter the applicable hazardous waste code(s) which identifies the waste or combination of wastes. See Rules 1200-1-11-.02(3) and (4) for the EPA waste codes. (For example, F001, K001, D001.)

Amount shipped (in kilograms) - Enter the amount of wastes in kilograms that you shipped during the reporting year to the specified TSD facility by the specified transporter. Use the Total Quantity (Item 13) from the Manifest after converting it to kilograms. The weight reported should include the weight of the drum unless you know that the waste will be removed from the drum and the drum will not be handled as a hazardous waste. For generators, this amount should match the total of lines 11D1 of the Waste Stream Reports that are included on this line. For TSDR's, it should match the lines on the Summary Report with the word "SHIPPED" in the handling column.

For conversion, 2.2 pounds equals one kilogram. Convert volume into weight in kilograms taking into account the appropriate density or specific gravity of the waste. For example, water weighs 8.34 lbs./gallon. A full 55 gallon drum of hazardous wastewater with a specific gravity of 1.02 should be reported as 55 gallons * 1.02 * 8.34 lb./gal ÷ 2.2lb./kg. = 212.67 or 212.7 kg.

Shipment - Enter the number of separately manifested shipments during the reporting year for each line completed.

TSDR ID number - Enter the Installation Identification Number of the treatment, storage or disposal facility/destination facility to which the waste was shipped. Enter only one number.

Transporter ID number - Enter the Installation Identification Number of the initial transporter who picked up the waste. Enter only one number.

Handling codes - Use the codes shown on page 6 of the instructions for the Hazardous Waste Stream Report. Enter the **TSDR Handling Codes** that most closely represent the techniques you contracted to be used at the facility that **received** this waste. Enter all codes that are applicable in the order of handling of the waste. Use only the TSDR Handling Codes and not the Waste Management Codes.

Totals - Sum the amount shipped and the number of shipments for each page and record the total of all pages on the last page.

Certification - The generator must sign the report and include the title and date signed. The certification must be made by one who is authorized to legally bind the company as when signing contracts.

1998 Hazardous Waste Generator Maintenance Fees

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

INSTRUCTIONS

Complete the following to determine if you owe the hazardous waste maintenance fee for generators. Return the certified form even if no fees are due.

1.1	Enter the number of months in 1997 that you generated more than 100 but less than 1000 kilograms of hazardous waste.	0
1.2	If you are a Conditionally Exempt Small Quanity Generator (CESQG), enter the number of months in 1997 that you accumulated at any time more than 1000 kilograms of non-acute hazardous waste.	0
1.3	Enter the number of months in 1997 that you generated 1,000 or more kilograms of hazardous waste.	0
1.4	Enter the number of months is 1997 that you generated 1 or more kilograms of acute hazardous waste, or 100 or more kilograms of a spill or residue of acute hazardous waste.	0
1.5	If you are a CESQG, enter one (1) if you received a Notice of Violation in 1997, other than for over-accumulation as expressed in line in 1.2 above.	0

Note: Wastes generated from the cleanup or containment of a Superfund site or a spill on public property shall be excluded from the above for the fee calculations only. Also, exlcuded are wastes listed under 1200-1-11.02(1)(c)(ii) or 40 CFR 261.5 (c) & (d), incorporated by reference in 1200-1-11.02(1)(a). For examples, wastes handled as H03, H05, H06 and H07; fly ash, drilling fluids, and cement kiln dusts; and still bottoms recycled onsite as long as the waste recycled has been counted once.

If all lines above are zero, you owe no fee. Enter zero on line 1 below and certify on line 2.

If either line 1.1 or 1.2 is greater than zero, and all lines 1.3 to 1.5 are zero, your are considered a small quantity generator for fee purposes. Enter $550 on line 1 below and certify on line 2.

If any line 1.3 to 1.5 is greater than zero, you are considered a large quantity generator for fee purposes. Enter $900 on line 1 below and certify on line 2.

Enter Name and Installation ID:

TND 98-778-3247 YY - - Nashville FO

GRAHAM FORD LINCOLN MERCURY
Attn: ~~R W CURTIS~~ Thomas M. Cude
HWY 46A BOX 516
DICKSON, TN 37055

Please complete and return the original to the above address.

For technical assistance, call 1-(800) 237-7018 (in Tennessee only.)

1. See the instructions to determine if you owe a hazardous waste generator maintenance fee. If you are a large quantity generator, enter $900. If you are a small quantity generator, enter $550. Else, enter zero. Submit the completed form with your check or money order payable to Treasurer, State of Tennessee. Do not send cash. 0

2. Certify that the information given above is true, accurate and complete.

Signature of owner, manager or authorized representative.	Title	Date
X Thomas M. Cude	X Service Manager	X 2/27/98

Below is for DEPARTMENT USE only.

CD No.	Date received	Amount	Receipt #	Comments
	RECEIVED			

CN-0906 (Rev. 11/95) RDA 2203

MAR 03 1998
Div. of
Solid & Hazardous Waste

DSWM L&C

ANNUAL HAZARDOUS WASTE REPORT PENALTY POLICY

1. Notices of Violation (NOVs) will be issued to all facilities whose reports have not been received by Tennessee by March 15. The NOVs will inform facilities that they will remain in violation until the State receives their report. Enclosed with the NOVs will be a copy of this Annual Hazardous Waste Report Penalty Policy.

2. **First Time Violators** are defined as those facilities that have never been issued an Order for filing a late Annual Report. The Penalty Policy will be applied to First Time Violators in the following manner:

a) If the report is postmarked (or received by the State) on or before April 30, a penalty will not be assessed.

b) If the report is postmarked (or received by the State) on or after May 1, the State will assess a penalty of $250 plus a per day penalty after May 1 of $25 until May 31.

c) If the report is postmarked (or received by the State) on or after June 1, the State will assess a total penalty of $1000.

d) If the report is postmarked (or received by the State) on or after December 31, the State will assess a total penalty of $4,000.

3. **Repeat Violators** are defined as those facilities that have received an Order from the State in previous years for filing a late Annual Report. The Penalty Policy will be applied to Repeat Violators in the following manner:

a) If the report is postmarked (or received by the State) on or before April 30, a penalty will not be assessed.

b) If the report is postmarked (or received by the State) on or after May 1, the State will assess a penalty of $1000 plus a per day penalty after May 1 of $50 until May 31.

c) If the report is postmarked (or received by the State) on or after June 1, the State will assess a total penalty of $2500.

d) If the report is postmarked (or received by the State) on or after December 31, the State will assess a total penalty of $4,000.

Approved: Tom Tiesler Date: 3-2-95

Tom Tiesler, Director
Division of Solid Waste Management

U.S. EPA REGION IV

SDMS

POOR LEGIBILITY

PORTIONS OF THIS DOCUMENT MAY BE UNREADABLE, DUE TO THE QUALITY OF THE ORIGINAL

*PLEASE CONTACT THE APPROPRIATE RECORDS CENTER TO VIEW THE MATERIAL

PSWY
L.C

HAZARDOUS WASTE FACILITY INSPECTION

SITE INSPECTED

TND 039102470
Harbour Mfg.
Highway 46 Hwy 230
Dickson, Tennessee 37055

PRIMARY CONTACT

Joe Bledsoe

INSPECTION DATE AND TIME

April 24, 1985
9:00 a.m.

INSPECTOR AND REPORTER

Bob Gardner
701 Broadway, R-01
Nashville, Tennessee 37219-6402
(615) 741-6619

OTHER INSPECTION PARTICIPANTS

PURPOSE OF INSPECTION

This routine/full inspection was conducted to evaluate Harbour's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

EVALUATION BASIS

Generator of hazardous waste

FACILITY DESCRIPTION

Harbour Manufacturer Fiberglass Boats

HAZARDOUS WASTE MANAGEMENT

About 7700 kg/month of paint acetone and cleaning cloth and hands is generated. This material is collected in a 55 gallon drum and processed daily in a solvent recovery distillation unit. Less than 150 kg/month of still bottoms is produced which is a cake like solid material with reverse liquids left. It is mixed with absorbent and the resultant mixture no longer exhibits this ignitable characteristic.

DSWM
L&C

JUL 0 8

7-9-85
Not [illegible]
TDY7-10[illegible]

July 3, 1985

Mr. Tom Tiesler
Tennessee Department of Health & Environment
Division of Solid Waste Management
Customs House 4th. Floor
701 Broadway
Nashville, Tn. 37219-5403

Dear Mr. Tiesler;

Re: Resource Recovery Petition

This petition is submitted in accordance with the Rules Governing Hazardous Waste Management in Tennessee, Rule 1200-1-11.01 (3) (d) in particular, requesting that you exempt from certain regulation spent acetone (F003). This material is generated from the cleaning of tools and equipment at Harbour, Inc's boat plant in Dickson, Tennessee. The following information is submitted for your consideration:

1. Petitioners Name and Address:
   Harbour, Inc.
   Box 250, Hwy. 46
   Dickson, Tn. 37055
2. Statement of the Petitioners Interest in the Proposed Action:
   To exclude spent acetone from the state remedial action fee requirements.
3. Description of Proposed Action:
   To reclaim spent acetone on-site by the use of a solvent recovery unit.
4. Statement of the Need and Justification for the proposed action:
   Harbour has found that the equipment and technology for efficient solvent recovery has advanced to the point that a quality recovered material is produced. This material is the equivalent to virgin acetone and is being used in place of it. Recycling spent acetone eliminates the need for costly off-site recycling and is considered to be one of the intents of RCRA.

5. Demonstration of Beneficial Reuse:

Spent acetone is collected daily in a 55 gallon drum which is kept closed except when adding or removing material. The waste is processed in the solvent recovery unit such that no more than two drums of waste are on hand at anytime thus reducing the possibility of spills, leaks and fires. The recovered product is placed in clean drums and reused. Only solid fiberglass residue remains in the still when a batch has been completed. Recent improvement in the design of the unit by the manufacturer allows for a higher operating temperature which produces the solid fiberglass at the end of the cycle. This solid fiberglass is removed and mixed with non-hazardous waste sawdust absorbent as permitted by Rule 1200-1-11-06 (1) (b) 2 (vi) of the act. The resultant mixture no longer exhibits the characteristic, ignitability, for which the still bottoms was originally listed. Accordingly, by applying rule 1200-1-11-02 (1) (c) 1. ii (III), the waste is no longer a hazardous waste. The sawdust and fiberglass mix is disposed of at the Dickson County Sanitary Landfill, in accordance with a Special Waste Approval letter from the Division of Solid Waste Management.

6. Description of the Method of use, reuse, recycling:

The method of recycling consists of charging spent acetone to the solvent recovery unit,closing the lid and electrically heating the material thus boiling off all liquids, the vapors produced are condensed in a water cooler condenser. The recovery unit used is model EPAR-55 manufactured by Recovery Filtration Products of Orange Park, Fla.

Your consideration in granting this exclusion will be greatly appreciated.

Sincerely,

Joe D. Bledsoe
Vice President
WINNER/Harbour, Inc.

JDB/bd

DCLF
LCC

DSWM L&C

ardous Waste Stream Description

see Department of Health and Environment, Division of Solid Waste Management.
a House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

nization's full name at facility.	EPA identification code
HARBOUR INC	TND038112470

s name. Use standard name from regulations whenever possible.	Waste Stream ID	EPA waste code
CETONE STILL BOTTOMS	1	[redacted] N000

the years that this waste has been generated, e.g. 1975, 1982-1984, June 1985-

2 YRS

rd criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below. (*)

[redacted]), EP toxic (b), Corrosive (c), Reactive (e), Otherwise toxic (f).

ical form	Percent solid
SOLID	N/A

ation rate in kilograms (KG). Supply both rates.		Volume to weight conversion (pounds per gallon)
ily Maximum	Annual average	
600	17,000	8.0 LB/GAL

ay	vount stored in kilograms	Maximum days stored	Frequency of generation
	*	*	Continuous Accidental (Various)

ahipping name	DOT hazard class	DOT ID. code
	[redacted]	

ibe generation process.

NT ACETONE IS PROCESSED IN AN ON-SITE SOLVENT RECOVERY
T TO RECLAIM ACETONE. THE RESULTANT STILL BOTTOMS HAS
FREE LIQUIDS AND IS NOT IGNITABLE. HARBOUR HAS
SION APPROVAL TO DISPOSE OF WITH PLANT TRASH IN THE
L LANDFILL.

ASTE DOES NOT EXHIBIT ANY HAZ. WASTE CHARACTERISTICS
ED IN DUMPSTER DAILY. (UPDATED NOTIFICATION 1/15/86)

ia on back. Below is for department use only.

ete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Initials
No	Yes	No	Yes	[redacted]	LRJ

s: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8)	Status Code	Date Received
	2	1-21-86

ar

Add to Harbour file DSWM C.C

TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT
COMPLIANCE MONITORING AND ENFORCEMENT ACTIVITY REPORT Dickson PH 2430 Rev 9/85

1. ID NO: TND 085838563 | Name: Winner Corp, The

ADDRESS: First & Pickett Street Dickson TN 37055

2. PROGRAM: Hazardous Waste (X) Solid Waste [ ]

3. KEY DATE: (MM-DD-YY) 07-16-86

TYPE OF EVALUATION

4. EVALUATION INSPECTION 07,16,86 (field visits)

A. FULL CHECKLIST
1. HW GEN [1]
2. HW TRANS [2]
3. HW TSDF [3]
4. HW SQ GEN [4]
5. HW NON-NOT (ASI)
6. SW PROCESSING FACILITY [6]
7. SW LANDFILL [7]
8. PART B INSPECTION [8]

B. OTHER
1. WALK-THROUGH INSP [1]
2. CLOSURE EVAL [2]
3. POST CLOSURE EVAL [3]
4. SPECIAL WASTE EVAL [4]
5. PART A MODIFICATION/WITHDRAWAL EVAL [5]
6. COMPLAINT FOLLOW-UP NOS [6]
7. EMERGENCY RESPONSE [7]
8. OTHER (describe in comments) [8]

5. SAMPLING INSPECTION ___/___/___
1. GENERATED WASTE [1]
2. RECEIVED WASTE [2]
3. SOIL/SEDIMENT [3]
4. SURFACE WATER/LEACHATE [4]
5. GROUND WATER [5]
6. AMBIENT AIR [6]
SAMPLES

6. SPECIAL INSPECTION ___/___/___
1. GROUNDWATER MONITORING [1]
2. OTHER (describe in comments) [2]
3. PRELIMINARY GEOLOGIC EVALUATION [3]
4. FINAL GEOLOGIC EVALUATION [4]

7. RECORDS/REPORT REVIEW ___/___/___ (non-permitting) (in office)
1. CLOSURE PLANS WITH COST ESTIMATES [1]
2. POST CLOSURE PLANS WITH COST ESTIMATE [2]
3. FINANCIAL INSTRUMENTS [3]
4. OTHER REQUIRED PLANS [4]
5. SPECIAL WASTE REQUEST [5]
6. LANDFILL PLANNING ANNUAL REPORT [6]
7. MANIFEST REPORTS [7]
8. MANIFEST RECORDS [8]
9. GWM DATA [9]
10. GWM PLANS [10]
11. OTHER [11]

8. FOLLOW-UP EVALUATION ___/___/___
1. WITH FIELD OFFICE PERSONNEL ONLY [1]
2. WITH CENTRAL OFFICE PERSONNEL [2]
3. FIELD VISIT [3]
4. RECORD REVIEW [4]

9. INCIDENT PROCESSING ___/___/___
1. ORAL COMPLAINT [1]
2. WRITTEN COMPLAINT [2]
3. EMERGENCY RESPONSE CALL [3]
4. OTHER (describe in comments) [4]

10. MISCELLANEOUS ___/___/___
1. FACILITY STATUS EVALUATION MEETINGS/LETTERS [1]
2. OTHER (describe in comments) [2]
3. ABORTED INSPECTION [3]
4. WARNING LETTER [4]

11. VIOLATION CODES: NONE (X)

12. ENFORCEMENT ACTIONS:

	DATE ACTION TAKEN	SCHEDULED COMPLIANCE DATE	ACTUAL COMPLIANCE DATE
NOTICE OF VIOLATION	___/___/___	___/___/___	___/___/___
COMPLIANCE REVIEW MEETING	___/___/___	___/___/___	___/___/___
REFERRED TO ENFORCEMENT SECTION	___/___/___		

13. COMMENTS: (continue on reverse if necessary) Winner Corp is out of business. They were reorganized as Harbour Inc and still use Winner Name on the boats they produce. Harbour is regulated. KEY OVER [ ]

14. PREPARED BY: D. Wall | ID CODE: 084 | DATE: 07-18-86 | FIELD OFFICE: Nashville 102

1987 DSWM LEC

Hazardous Waste Stream Report - Page 1 of 2 JAN 09 1987

ll instructions for form PH-2022 for additional information and codes.

r ization's name. : EPA ID CODE
ARBOUR INC TND 03-811-2470

aste name. : Waste stream ID
PENT ACETONE 2

ive years this waste has been generated. : Frequency of generation
1984 - VARIOUS

ark all appropriate hazard criteria below. : EPA waste codes.
gnitable (a),EP toxic (b), Corrosive (c), F003
eactive (e), Other toxic (f)
ODES: A

hysical form : Percent solid : Volume to wt. (lb/gal)
IQUID, OTHER BASED 5.0 7

eneration rates in kilograms.

onthly maximum	Annual average	Max. amount stored	Max. days stored
4,500	48,000	1,000	5

OT shipping name : DOT hazard class : DOT ID code

escribe generation process.
P ACETONE IS PRODUCED FROM CLEANING HANDS AND TOOLS. AN ON-SITE
OL NT RECOVERY UNIT IS USED TO RECLAIM ACETONE FOR REUSE. (UPDATED
OTIFICATION 1/15/86)

ANNUAL REPORT SECTION *** Lines 9-11.
f the waste was shipped off-site, also submit Annual Shipping Report for
dous Waste Generators. If waste was handled on-site in a permitted
ity, use "T", "S", or "D" codes from instructions. Otherwise, use "H"
from instructions.

t:	Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes
	46,500 Kg	200 Kg	200 Kg	H09

Describe the efforts undertaken to reduce the volume and toxicity in the
ation of this waste during the reported year. This reduction refers to
ation processes and not treatment methods.
ABOUR UTILIZES BEST MANAGEMENT PRACTICES TO OPTIMIZE THE
ICY USE OF CLEAN ACETONE.

Describe changes in volume and toxicity that those reduction efforts
ibed in line 10 produced last year compared to previous years since 1984.
N/A - NOT IN BUSINESS IN FULL IN 1984.

EPA ID CODE TND 03-811-2470

4. HARBOUR INC
JOE BLEDSOE
HWY 46 BOX 250
DICKSON TN 37055

Tennessee Department of Health and Environment
Division of Solid Waste Management
Customs House, Fourth Floor
701 Broadway
Nashville, Tennessee 37219-5403

JAN 21

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018

2. Dot Shipping Name / Waste name	EPA Waste codes	Amount shipped in kilograms	Number of shipments	TSDF EPA ID number	Transporter EPA ID number	Handl
a. NO HAZARDOUS WASTE SHIPPED OFF-SITE. SOLVENT RECOVER						
b. UNIT IS USED TO PROCESS SPENT ACETONE 1-20-87						
c.						
d.						
e.						
f.						
g.						
h.						
i.						

3. Certification: I certify that the above information is true, accurate and complete. (Sign by owner or manager and give title and date.)

Joe Bledsoe V.P. 1-20-87

NO SHIPMENTS REPORTED

PH 2118b.

Hazardous Waste Stream Report - Page 1 of 2 JAN 09, 1987

ll instructions for form PH-2022 for additional information and codes.

rganization's name.
ARBOUR INC

: EPA ID CODE
TND 03-811-2470

aste name.
CETONE STILL BOTTOMS

: Waste stream ID
1

ive years this waste has been generated.

: Frequency of generation
VARIOUS

ark all appropriate hazard criteria below.
gnitable (a), EP toxic (b), Corrosive (c),
eactive (e), Other toxic (f)
ODES: A

: EPA waste codes.
~~N000 N002~~ OK
F003

hysical form
IQUID, OTHER BASED

: Percent solid
~95 ~~5.0~~

: Volume to wt. (lb/gal)
8

eneration rates in kilograms.

onthly maximum	Annual average	Max. amount stored	Max. days stored
1600 ~~1,600~~	12,000 ~~17,000~~	0 ~~900~~	0 ~~15~~

OT shipping name

: DOT hazard class : DOT ID code

ir the generation process. SOLVENT RECOVERY STILL BOTTOMS HAVE
ft. DECLARED NON HAZARDOUS AND APPROVED FOR DISPOSAL
DICKSON LANDFILL.

NNUAL REPORT SECTION xxx Lines 9-11.

the waste was shipped off-site, also submit Annual Shipping Report for
lous Waste Generators. If waste was handled on-site in a permitted
ty, use "T", "S", or "D" codes from instructions. Otherwise, use "H"
from instructions.

Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes
11,600	0	0	H04

escribe the efforts undertaken to reduce the volume and toxicity in the
tion of this waste during the reported year. This reduction refers to
tion processes and not treatment methods.

NOT HAZARDOUS AS DISPOSED OF.

escribe changes in volume and toxicity that those reduction efforts
bed in line 10 produced last year compared to previous years since 1984.

E826 (mo)

Hazardous Waste Stream Report - Page 2 of 2 JAN 09, 1987

l instructions for form PH-2022 for additional information and codes.

ganization's name.
RBOUR INC

: EPA ID CODE
TND 03-811-2470

ste name.
ETONE STILL BOTTOMS

* Waste stream ID
1

emical Characteristics.
: Flash point
>140F

: Concentration units. For EP toxic wastes, indicate PPM.

jor and hazardous consituents.
SOLIDIFIED RESIN
MEK PEROXIDE.

: lower : upper

escribe handling methods with codes from instructions.

ent codes	Storage codes	Disposal codes	Location
			OFF-SITE

entify EPA ID code all transporter and TSDF operators involved in ng this waste.
NA

c ify that this information is true, accurate and complete.
GNATURE: (Generator or authorized representative), title and date.

B Bladen 1-20-87

is for department use only.

te rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
6/87	Yes No	Yes No	Yes No	Yes No	RCG

: Not hazardous (1); Demonstrated not hazardous (2);
generator (3); Resource recovery (4); Partial exemption (5); 2
sus (6); Accidental (7); No longer generated (8);
e granted (9); Conditionally exempt (A).

ments.

THIS MATERIAL HAS BEEN SHOWN TO BE NONHAZARDOUS.
T CONTAINS NO FREE LIQUIDS. DSWM HAS
SUED A "SPECIAL WASTE DISPOSAL APPROVAL" LETTER.

DSWM C.C

TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT
COMPLIANCE MONITORING AND ENFORCEMENT ACTIVITY REPORT

PM 2430
Rev. 9/85

TND 038112470 | Name: HARBOUR Inc

Hwy 46 Box 250 : Dickson TN 37055

Hazardous Waste (X) Solid Waste [ ]

(MM-DD-YY) 05-05-87

TYPE OF EVALUATION

ION INSPECTION 05,87	A. FULL CHECKLIST		3. HW TSDF [3]	6. SW PROCESSING FACILITY [6]	
	1. HW GEN (X)		4. HW SQ GEN [4]	7. SW LANDFILL [7]	
	2. HW TRANS [2]		5. HW NON-HOT [5]	8. PART B INSPECTION [8]	
site)	B. OTHER	1. WALK-THROUGH INSP [1]		5. PART A MODIFICATION/WITHDRAWAL EVAL [5]	
		2. CLOSURE EVAL [2]		6. COMPLAINT FOLLOW-UP NOE [6]	
		3. POST CLOSURE EVAL [3]		7. EMERGENCY RESPONSE [7]	
		4. SPECIAL WASTE EVAL [4]		8. OTHER (describe in comments) [8]	
S INSPECTION ___/___	1. GENERATED WASTE [1]	3. SOIL/SEDIMENT [3]	5. GROUND WATER [5]	# SAMPLES	
	2. RECEIVED WASTE [2]	4. SURFACE WATER/LEACHATE [4]	6. AMBIENT AIR [6]		
INSPECTION ___/___	1. GROUNDWATER MONITORING [1]		3. PRELIMINARY GEOLOGIC EVALUATION [3]		
	2. OTHER (describe in comments) [2]		4. FINAL GEOLOGIC EVALUATION [4]		
REPORT REVIEW	1. CLOSURE PLANS WITH COST ESTIMATES [1]		7. MANIFEST REPORTS [7]		
	2. POST CLOSURE PLANS WITH COST ESTIMATE [2]		8. MANIFEST RECORDS [8]		
	3. FINANCIAL INSTRUMENTS [3]		9. GWM DATA [9]		
	4. OTHER REQUIRED PLANS [4]		10. GWM PLANS [10]		
mitting)	5. SPECIAL WASTE REQUEST [5]		11. OTHER [11]		
(Ifica)	6. LANDFILL PLANNING ANNUAL REPORT [6]				
EVALUATION ___/___	1. WITH FIELD OFFICE PERSONNEL ONLY [1]		3. FIELD VISIT [3]		
	2. WITH CENTRAL OFFICE PERSONNEL [2]		4. RECORD REVIEW [4]		
PROCESSING ___/___	1. ORAL COMPLAINT [1]		3. EMERGENCY RESPONSE CALL [3]		
	2. WRITTEN COMPLAINT [2]		4. OTHER (describe in comments) [4]		
MEETING ___/___	1. FACILITY STATUS EVALUATION MEETINGS/LETTERS [1]		3. ABORTED INSPECTION [3]		
	2. OTHER (describe in comments) [2]		4. WARNING LETTER [4]		

CODES: NONE (X)

ENF. ACTIONS:	DATE ACTION TAKEN	SCHEDULED COMPLIANCE DATE	ACTUAL COMPLIANCE DATE
VIOLATION	___/___/___	___/___/___	___/___/___
REVIEW MEETING	___/___/___	___/___/___	___/___/___
ENFORCEMENT SECTION	___/___/___		

(Continue on reverse if necessary) Company has a Variance from classification as a waste. No violations noted

KEY OVER [ ]

BY: D Wall | ID CODE: 084 | DATE: 05-11-87 | FIELD OFFICE: Nashville 102

SWM C!C

PUBLIC NOTICE

The Commissioner of the Tennessee Department of Health and Environment is hereby giving notice of this tentative decision to grant a variance from classification as a waste, for spent acetone, Hazardous Waste Code F003, as generated at Harbour Inc., Highway 46 in Dickson, Tennessee 37055, because this hazardous material is recycled in a manner which will not pose a significant hazard to public health or the environment. This variance will only apply to the material identified in the request and only when it is managed as described in the request.

Harbour Inc. generates in their boat manufacturing process spent acetone. This waste exhibits the hazardous characteristic of ignitability. Harbour Inc. recovers the acetone from their spent acetone by an on-site distillation process. The recovered acetone is reused as it was originally used. The on-site recovery and reuse of this hazardous waste will reduce the risks to health and environment associated with hazardous waste transportation and disposal.

The procedures for determining that certain hazardous materials that are being recycled will no longer be classified as wastes are provided in Tennessee Rule 1200-1-11-.01(4) Variance from Classification as a Waste.

Comments and/or requests for a hearing on this tentative decision will be accepted for 30 days ending at 4:30 p.m. OCT 05 1987 .

Comments or requests for a hearing should be sent to: Mr. Tom Tiesler, Director, Division of Solid Waste Management, Tennessee Department of Health and Environment, Customs House, 4th Floor, 701 Broadway, Nashville, Tennessee 37219-5403; phone (615) 741-3424.

The Commissioner will issue a final decision to either grant or deny the variance after receipt of comments and after the hearing (if any).

If you wish to review the draft variance, or wish further information, please contact: Division of Solid Waste Management Field Office, Tennessee Department of Health and Environment, Customs House, Room B-01, Nashville, TN 37219-5403; phone (615) 741-0654.

TY/ah/SW-154

full instructions for form PH-2022 for additional information and codes.

DSWM L&C

Organization's name.
HARBOUR INC

| EPA ID CODE
THD 03-811-2470

| Waste stream ID
1

Waste name.
ACETONE STILL BOTTOMS

Give years waste generated
1974 -

| Date stopped
/ /

| Frequency of generation
VARIOUS

Mark all appropriate hazard criteria below. |EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| A

F003 N000

3732

| Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/LB.
OTHER SOLID | 095.0 | | 0008.000 |

Generation rates in kilograms.

| Monthly maximum | Annual average | Max. amount stored | Max. days stored
1,500 | 12,000

DOT shipping name

| DOT hazard class | DOT ID code

Describe generation process.
SPENT ACETONE IS DISTILLED IN AN ON SITE SOLVENT RECOVERY UNIT.
RESULTING "BOTTOMS" HAVE BEEN SHOWN TO BE NON HAZARDOUS.

ANNUAL REPORT SECTION ** LINES 9-11

| Year | Amount generated during year (kg) | Amount on site on first day (kg) | Amount on site on last day (kg)
1987 | ~~75,000~~ | ~~0~~ | ~~0~~

| | Amount Handled | Handled On site? | TSDF handling/Waste management methods
A | | Y N | ~~DISPOSED OF WITH APPROVAL~~
B | | Y N |
C | | Y N | ~~IN LOCAL SANITARY LANDFILL.~~
D | | Y N |

Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
Reformulation/redesign of product a( ) d. Substituting raw materials d(
In process recycling. . . . . b( ) e. Improved operations. . . . . e(
Equipment/technology modification c( ) f. No effort. . . . . f(

Other - explain below: . . . . . g( )

Describe changes in volume and toxicity that these reduction efforts checked in line 10 produced last year compared to the previous year.

more toxic-a( ) b. less toxic-b( ) c. No change-c(X) | Amt of Reduction (kg)

RECEIVED
FEB 1988
DIV. OF SWM

full instructions for form PH-2022 for additional information and codes.

Organization's name. | EPA ID CODE
HARBOUR INC | TND 03-811-2470

Site name. | Waste stream ID
SPENT ACETONE | 2

Give years waste generated | Date stopped | Frequency of generation
1984- / / VARIOUS

Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES | A | F003 | 3732

Physical form	% Solid	% Water	Lb./gal.	Chlorine PPM	BTU/lb.
LIQUID, OTHER BASED	005.0		0007.000		

Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
4,500	48,000	1,000	5

DOT shipping name | DOT hazard class | DOT ID code

Describe generation process.
SPENT ACETONE IS PRODUCED FROM CLEANING HANDS AND TOOLS. AN ON-SITE SOLVENT RECOVERY UNIT IS USED TO RECLAIM ACETONE FOR REUSE. (UPDATED NOTIFICATION 1/15/86)

ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987	18,500 (1)	~200	0

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	18,500	(Y) N	T54
B		Y N	
C		Y N	
D		Y N	

Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

Reformulation/redesign of product a( ) d. Substituting raw materials d( )
In process recycling. . . . . b( ) e. Improved operations. . . . e( )
Equipment/technology modification c( ) f. No effort. . . . . (f)

Other - explain below: . . . . . g( )

RECEIVED FEB 4 1988 DIV. OF SW

Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

more toxic-a( ) b. less toxic-b( ) c. No change-c(X). | Amt of Reduction (kg)

9 ~~VARIANCE WAS GRANTED DURING 1987. WASTE IS NO LONGER REGULATED AS F003.~~

DSWM LOC

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Below is incorrect, please change, certify and return. Retain a copy of any changes.

Organization's full, legal name			EPA identification code
HARBOUR INC			TND 05-811-2470

Mailing address	City	State	Zip code
HWY 46 BOX 250	DICKSON	TN	37055

Site address	City	State	Zip code	County name
HWY 46				Dickson

Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)
00.0000	00.0000

Owner name	Type	Phone with area code
HARBOUR INC.		(615) 446-3010

Manager or operator name	Type	Phone with area code
JOE BLEDSOE		(615) 446-3010

Principal technical contact	Phone with area code
JOE BLEDSOE	(615) 446-3010

Number of employees	Year operation began	SIC codes (Primary SIC first, etc.)	Job shop
65	1984	3752, 2392,	Yes No (N)

Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
JOE BLEDSOE	ALL TIMES	(615) 446-3010
PETE WEALKER	ALL TIMES	(615) 446-3010

List current environmental air, water, and radiological permits. Give permit type, source, number and expiration date. If a range of related permits, give the first and last permit number.

AIR PERMITS APPLIED FOR AND CURRENTLY BEING EVALUATED.

Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date

*** Below is for Department use only ***

Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
2-15-1995	22				

Date	Date registered	Date deregistered
8-05-1995		

Comments: FACILITY IS NO LONGER IN BUSINESS. DW

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

Organization's full name at facility HARBOUR INC	EPA identification code TNC [illegible]
Waste name. Use standard name from regulations whenever possible. ACETONE STILL BOTTOMS	Waste Stream number

Give the years that this waste has been generated, e.g. 1975, 1982-. 1994-	Date no longer generated. (MM/DD/YY) 10-05-1995	Frequency of generation Continuous Accidental/ One time Various

Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.) F003	SIC code for generating process. [illegible]

Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Sludge [illegible]	[illegible]	[illegible]	5.000	[illegible]	[illegible]

Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
1,000.0	12,000.0	[illegible]	[illegible]

DOT shipping name	DOT hazard class	DOT ID code

Describe generation process.

SPENT ACETONE IS DISTILLED IN AN ON SITE SOLVENT RECOVERY UNIT. RESULTING "BOTTOMS" HAVE BEEN SHOWN TO BE NON

Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )
	140F		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. SOLIDIFIED RESIN		
b. MEK PEROXIDE.		
c.		
d.		
e.		

If this waste is recovered, reclaimed, recycled or reused, describe how.

HAZARDOUS.

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

Organization's full name at facility HARBOUR INC	EPA identification code TND 03-811-2470
Waste name. Use standard name from regulations whenever possible. SPENT ACETONE	Waste Stream number 2
Give the years that this waste has been generated, e.g. 1975, 1982-. 1984-	Date no longer generated. ~~(MM/DD/YY)~~ 10-05-1995
Frequency of generation (V) Continuous / Accidental/ One time / Various	
Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). A	EPA waste codes. (Primary first; six maximum.) F003
SIC code for generating process. 3732.	

Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Liq-Othr (J)	5.0	.	7.000	0.0	0.0

Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
4,500.0	48,000.0	1,000.0	5

DOT shipping name	DOT hazard class	DOT ID code

Describe generation process.

SPENT ACETONE IS PRODUCED FROM CLEANING HANDS AND TOOLS. AN ON-SITE SOLVENT RECOVERY UNIT IS USED TO RECLAIM ACETONE FOR REUSE. (UPDATED NOTIFICATION 1/15/86)

Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( ) ( )
	0F		

Major and hazardous constituents. Give range of values at right.	Lower value	Upper value
a. ACETONE	60	95
b.		
c.		
d.		
e.		

If this waste is recovered, reclaimed, recycled or reused, describe how.

ON-SITE STILL-VARIANCE GRANTED

U.S. EPA REGION IV

SDMS

POOR LEGIBILITY

PORTIONS OF THIS DOCUMENT MAY BE UNREADABLE, DUE TO THE QUALITY OF THE ORIGINAL

*PLEASE CONTACT THE APPROPRIATE RECORDS CENTER TO VIEW THE MATERIAL

Reply 11-6-84

PFL

DSWM

C&C

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

October 31, 1984

Interstate Packaging Company
Post Office Box 40
White Bluff, Tennessee 37187
TND 049495138

Attn: Ray Russell

Dear Mr. Russell:

I have received information from Paul Lynes that shows the still bottoms from the processing of the waste solvent blendings to have a flash point of greater than 140° F. Since this solvent mixture was originally identified as a D001 (ignitable characteristic) waste and the bottoms are not ignitable by definition, the bottoms are not considered a hazardous waste and may be disposed of as a special waste in the Dickson County sanitary landfill, registration number 65. This will be a two time disposal of 30 5 gallon buckets now and approximately 2035 gallon buckets listed on a dark red solid material. As always with special wastes, the landfill has the prerogative to accept or reject the waste. Arrangements should be made with Virgil Bailey at the Court House in Charlotte.

Thank you and your personnel for the exemplary handling of this matter over the past several months.

Sincerely,

Mark Hinder

Mark McWhorter
Division of Solid Waste Management

MM:jh

cc: Virgil Bailey
Dickson Co. Health Dept.
Paul Lynes
City of White Bluff

FEB 21 1985 SWM Ltc

FY 84-85 Remedial Action (SUPERFUND) Fee Worksheet

for the Hazardous Waste Management program of the Department of Health and Environment.
Division of Fiscal Services, 6-420 Cordell Hull Building, Nashville, TN 37219.

EPA ID Code TND 04-989-3138
Interstate Packaging Company
Sam Russell/Larry Robertson
P.O. Box AG
Dickson, TN 37187

Please complete and return to the above address. Please correct any incorrect information on the label. See the instruction pages and regulations for detailed information for completing this form. For technical assistance, call (615) 741-4287.

1. Enter the total amount of hazardous wastes generated during the year of Jan. 1, 1983 to Dec. 31, 1983, or, if no hazardous wastes were generated in the year of 1983, enter the amount of hazardous wastes generated from January 1 through April 30, 1984. Enter to the right the year the wastes were generated as 1983 or 1984.	13,021 kgl 1983 year	
2a. Waste amount from fossil fuel combustion.	0 kgl	2g. Municipal incineration waste amount. — 0 kgl
b. Ore dissolo waste amount.	0 kgl	2h. Waste excluded by petition amount. — 9720 kgl
c. Applicable energy associated waste amount.	0 kgl	2i. Transportation spill waste amount. — 0 kgl
d. Cement kiln dust waste amount.	0 kgl	2j. Hazardous wastes no longer generated after April 30, 1984. — 0 kgl
e. Wastewater treatment plant influent waste amount. (See permit requirements.)	0 kgl	2k. Hazardous wastes produced from on-site treatment unless the original waste was excluded. — 0 kgl
f. Public Owned Treatment Works (POTW) sludge waste amount.	0 kgl	2l. Inactive site clean-up waste amount. — 0 kgl
m. Enter the sum of lines 2a - 2l to the right		9720 kg
3. Enter the difference between line 1 and line 2(m).		3301 kgl
4. If 1983 was entered in line 1, enter the amount of line 3 into line 4. If 1984 was entered in line 1, compute an estimated annual total amount of hazardous wastes generated by dividing line 3 by the number of months wastes were generated in the first four months of 1984 and multiplying by 12. If an alternative estimation method is used, check and attach documentation: ( ).	3301 kgl	
5. Enter the correct fee from Table 1 which is located at the end of this form. Use the waste amount from line 4 above to determine the fee.	$300.00	
6. If an acutely hazardous waste was generated from January 1, 1983 through April 30, 1984 and shipped off-site for disposal, enter $500.00. If this waste was not landfilled, check and attach documentation: ( ).	$0	

PH-2387, (SWM rev. 8/84)

Form is continued on the back.

SD-0122/3-27-15/360.98/26913

DSWM
L&C

[illegible] Remedial Action (SUPERFUND) Fee Worksheet

[illegible] of the Department of Health and Environment.
Division of Fiscal Services 4-120 Cordell Hull Building, Nashville, TN 37219.

EPA ID CODE TND 980906138 Y- -
RAM MUSSELL PLANT
ROBERTSON
INTERSTATE PACKAGING COMPANY
PO BOX 88
TN 37187

Please complete and return to the above address. Please correct any incorrect information on the label. See the instructive pages and regulations for detailed information for completing this form. For technical assistance, call (615) 741-4287.

1. Enter the total amount of hazardous waste generated during the year of Jan. 1, 1984 to Dec. 31, 1984, or, if no hazardous waste was generated in the year of 1984, enter the amount of hazardous waste generated from January 1 through April 30, 1985. Enter to the right the year the waste was generated as 1984 or 1985.	7507 kgl	1984 year
2a. Waste amount from fossil fuel combustion.	0 kgl	2d. Municipal incineration waste amount. 0 kgl
2b. Bro-mining waste amount.	0 kgl	2h. Waste excluded by petition amount. 6947 kgl
2c. Applicable owner associated waste amount.	0 kgl	2i. Transportation spill waste amount. 0 kgl
2e. Closed site soil waste amount.	0 kgl	2j. Hazardous wastes no longer generated after April 30, 1985. 0 kgl
2g. Wastewater treatment plant influent waste amount. (See permit requirements.)	0 kgl	2k. Hazardous wastes produced from on-site treatment unless the original waste was excluded. 0 kgl
2f. Public Owned Treatment Works (POTW) sludge waste amount.	0 kgl	2l. Inactive site clean-up waste amount. 0 kgl
3. Enter the sum of lines 2a - 2l to the right		6947 kgl
4. Enter the difference between line 1 and line 2(m).		560 kgl
5. If 1984 was entered in line 1, enter the amount of line 3 into line 4. If 1985 was entered in line 1, compute an estimated annual total amount of hazardous waste generated by dividing line 3 by the number of months waste was generated in the first four months of 1985 and multiplying by 12. If an alternative estimation method is used, check and attach documentation ( ).		560 kgl
6. Enter the correct fee from Table 1 which is located at the end of this form. Use the waste amount from line 4 above to determine the fee.		$ 0
7. If an acutely hazardous waste was generated from January 1, 1984 through April 30, 1985 and shipped off-site for disposal, enter $500.00. If this waste was not landfilled, check and attach documentation ( ).		$ 0

PH-2287, (SWM rev. 8/85)

DSWM L.C.

Hazardous Waste Description

Tennessee Department of Public Health, Division of Solid Waste Management,
Cordell Hull Building, 701 Broadway, Nashville, TN 37219-5403

1. Generator's full name at facility.	EPA identification code
Interstate Packaging Co.	TND 04-949-5138

2. Waste name. Use standard name from regulations whenever possible.	Waste name #	EPA waste code
Perchloroethylene Still Bottoms	1	F002

3. Is this waste listed in the regulations in Rule 1200-1-11-.02(4)? Yes (X) No

4. Does this waste qualify as hazardous under the criteria of Rule 1200-1-11-.02(3)? Yes (X) No

5. Is this waste exempted from certain regulations according to Rule 1200-1-11-.02(1)(c)(2)(ii), for examples, fly ash, drilling fluids, mining wastes, and cement kiln dust? Yes (X) No

6. Give the years that this waste has been generated or processed by a treatment, storage, or disposal facility.

7. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below. Codes

Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Otherwise toxic (f).

8. Physical form	Percent solid
Solid	Greater than 99% 9-99

9. Generation or handling rate in kilograms (KG).

Monthly Average	Monthly Maximum	Annual average	Frequency of generation
80	90	960	Continuous Seasonal Various

10. Amount stored (Ave. KG)	Days stored (Ave.)	Transportation mode
480	180	Rail, Water, Highway, Air, Other

DOT shipping name	DOT hazard class	DOT ID. code
Waste Perchloroethylene	ORM-A	UN 1897

11. Describe generation process.

Distillation Still Bottoms

Lines 12/13 on back. Below is for department use only.

14. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Curr. Gen.	Initials
Yes (X)	Yes (X)	Yes (X) No	Yes (X) No	12	Yes (X) No	RLG

Status: Not hazardous (1) Demonstrated not hazardous (2) Small generator (3) Resource recovery (4) Partial exemption (5) Hazardous (6) Accidental (7) No longer generated (8)

Status Code	Date Received
3	1-5-85

12. Public Health Comments.

PH-2022 (SWM 8/82 Rev.)

JNL-22-0065
DS

DSWM-L+C
DEC 04 1985

CRAIG-LYNES CHEMICAL MANAGEMENT, INC.

404 EAST BRAME AVENUE
WEST POINT, MS 39773
601-494-1902

1108 LIPSCOMB DRIVE
NASHVILLE, TN 37204
615-383-8490

November 27, 1985

Mr. Tom Yates
TN Dept. of Health & Environment
Solid Waste Division
701 Broadway
Nashville, TN 37912-5403

RE: Interstate Packaging Company
TND 049 495 138
Still Bottoms

Dear Mr. Yates:

As you will remember, Interstate Packaging Company, White Bluff, generates two streams of still bottoms:

1) Ink waste recovery, D001, and
2) Perchloroethylene recovery, F002

Enclosed please find documentation for the disposition of these waste. The ink waste bottoms have received a Special Waste Permit, registration number 65, for disposal in the Dickson County Sanitary Landfill. The perchloroethylene still bottoms has been accepted for incineration by LWD, Inc., Calvert City, KY.

This should complete the required information for the exclusion petition. If you have any questions, please contact me.

Sincerely,

Paul Finger Lynes

Paul Finger Lynes
Vice President

cc: Larry Robertson, Interstate Packaging

DSWA
L.C

PROCESS FLOW SHEET

INTERSTATE PACKAGING COMPANY

White Bluff, TN

PROCESS:	Printing Press	Platemaking
SOLVENT:	Isopropyl Alcohol	Tetrachloroethylene Perchloroethylene "Perc"
Waste Code:	D001	F002
Volume:	400 Gal/Mo	25 Gal/Mo
Still:	PRI SC-200	PRI SC-100
Capacity:	15 Gal/Hr	7.5 Gal/Hr
Recovered Solvent:	1) Ink Formulation 2) Wash-up	Platemaking
Still Bottoms:	25 Gal/Mo	2-3 Gal/Mo
Classified:	Non-hazardous	F002
Disposition:		
Opt. 1:	Dickson Co. San. Landfill	ILWD Calvert City, KY
Opt. 2:	Allworth, Inc. Birmingham, AL	Allworth, Inc. Birmingham, AL

Dickson Co. 22-38

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

December 29, 1986

Craig-Lynes Chemical Management, Inc.
1108 Lipscomb Drive
Nashville, TN 37204

RE: ~~Interstate Packaging~~ Special Waste Approval

Dear Mr. Lynes:

After review of submitted data and in consideration of first-hand knowledge of Interstate Packaging's processes, special waste approval is given for up to 150 gallons (30 five gallon buckets) per month of non-hazardous still bottoms derived from distillation of the D001 waste to be disposed of at the Dickson County Landfill, not the waste approval.

As with any special waste approval, the landfill has the option to accept or reject the waste.

Sincerely,

Mark McWhorter

Mark McWhorter
Division Of Solid Waste Management

MM/kk

cc: ~~Interstate~~ Packaging Company
~~Dickson County~~ Health Department
Tom Yates, DSWM Central Office

OSWM
LTC

HAZARDOUS WASTE FACILITY INSPECTION

SITE INSPECTED

Interstate Packaging Company
TND 049653138
P.O. Box AG
White Bluff, TN 37187

PRIMARY CONTACT

Larry Robinson
797-2161

INSPECTION DATE AND TIME

January 17, 1986
10:00 a.m.

INSPECTOR AND REPORTER

David Wall
701 Broadway, B-01
Nashville, TN 37219-5403
(615)-742-6669

OTHER INSPECTION PARTICIPANTS

Ray Russell, Interstate

PURPOSE OF INSPECTION

This routine unscheduled full inspection was conducted to evaluate Interstate's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

EVALUATION BASIS

Generator

FACILITY DESCRIPTION

Interstate prints labels on plastic and paper for the packaging of various products. A D001 solvent from clean up operations is generated, and a F002 perchloroethylene from printing plate etching operations is produced.

INSPECTION FINDINGS

Interstate has one distillation unit and has ordered another one. The volume of business has increased necessitating the second still. A backlog of drums of still bottoms, solvents and perchloroethylene has accumulated at the site that will necessitate an off-site shipment to remove the backlog. This shipment is scheduled to be completed

INSPECTION FINDINGS (continued)

by January 24, 1986. A follow up inspection will be performed to insure that the drums have been removed. Interstate has a resource recovery exclusion on both of their waste streams. No violations with respect to generator requirements were noted at the time of this inspection.

SIGNED: David Wall
David Wall

DATE: January 27, 1986

DSOW L.C

Hazardous Waste Description

Tennessee Department of Public Health, Division of Solid Waste Management,
Customs House, 701 Broadway, Nashville, TN 37219-5403

FEB 11 1986

1. Generator's full name or facility.	EPA identification code
INTERSTATE PACKAGING CO.	TND 049 495 138.

2. Waste name. Use standard name from regulations whenever possible.	Waste code #	EPA waste code
WASTE FLAM. LIQUID (ALCOHOL)	+2	D001

3. Is this waste listed in the regulations in Rule 1200-1-11-.02(4)? Yes (XXX)	4. Does this waste qualify as hazardous under the criteria of Rule 1200-1-11-.02(3)? (XXX) No

5. Is this waste exempted from certain regulations according to Rule 1200-1-11-.02(1)(d)2(ii). For examples, fly ash, drilling fluids, mining wastes, and cement kiln dust?	Yes (XXX)

6. Give the years that this waste has been generated or processed by a treatment, storage, or disposal facility.

SINCE 1969

7. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.

(initial) (a) EP toxic (b). Corrosive (c). Reactive (e). Otherwise toxic (f).	codes — A

8. Physical form	Percent solid	
LIQUID	10%	3-10

9. Generation or handling rate in kilograms (KG). Monthly Average	Monthly Maximum	Annual average	Frequency of generation
1083	1200	13000	(Continuous) Seasonal Various

10. Amount stored (Avg. KG)	Days stored (Ave.)	Transportation mode
3200	180	Rail, Water, Highway, Air, Other

DOT shipping name	DOT hazard class	DOT ID. code
WASTE SOLVENT N.O.S.		UN 1993

11. Describe generating process.

FLEXO PRINTING WASHUP

Lines 12/15 on back. Below is for department use only.

16. Complete?	Test results?	Reasonable?	Follow-up	Doc haz. Class	Curr. Gen.	Initials
(Yes) No	Yes (No)	(Yes) No	Yes (No)		(Yes) No	RCC

Status: Not hazardous (1)? Demonstrated not hazardous (2)? Small generator (3)? Resource recovery (4)? Partial exemption (5)? Hazardous (6)? Accidental (7)? No longer generated (8)	Status Code	Date Received
	6	2/11/86

17. Public Health Comments.

PH-2022 (SWM 3/82 Rev.)

DSWM LRC

MAY 20 1986

[illegible] Waste Notification

[illegible] Department of Health and Environment, Division of Solid Waste Management.
[illegible] Floor, 701 Broadway, Nashville, Tennessee 37219-5403

1. Generator's full name or facility. INTERSTATE PACKAGING COMPANY		EPA Identification code TND 04-949-5138	
2. Mailing address P. O. Box AG	City White Bluff	State abbrev. TN	ZIP code 37187
3. Facility physical location or address. Hwy 47N, White Bluff, TN		Facility county name Dickson	
4. Owner name Jerald Doochin		Phone with area code (615) 797-3141	
5. Manager or operator name Ray Russell		Phone with area code (615) 797-3141	
6. Principal technical contact Sam Russell/ Larry Robertson		Phone with area code (615) 797-3141	
7. Number of employees 60	Date operation began 1969	SIC codes (Primary SIC first, etc.) 2643	Job shop Yes No
8. Emergency contacts for 24 hours per day and 7 days per week. Name	Time period covered	Phone with area code	
a. Sam Russell		(615) 446-4024	
b. Larry Robertson		(615) 763-2851	
c.			
d.			

9. Current environmental permits for air, water, solid waste and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit.

10. Certify that the information given in this document is true, accurate and complete by signing and dating.
Signature of authorized representative: [signature] | Title: Plant Manager | Date: 5/19/86

Below is for Department use only.	11. Date received	County code	Priority	Generator	Small generator	Major generator
	5-20-86	22		Y	N	

12. Date closed	Date regulated	Date deregulated

13. Comments

Annual Shipping Report for Hazardous Waste Generators

Page 1 of 1

EPA ID CODE-IND 04-949-5138 Y- -N
INTERSTATE PACKAGING COMPANY
ATTN RUSSELL/LARRY
ROBERTSON
P.O. BOX AG
TN 37187

Please complete and return this form to following address:

Tennessee Department of Health and Environment
Division of Solid Waste Management
Customs House, Fourth Floor
701 Broadway
Nashville, Tennessee 37219-5403

For technical assistance, call (615) 741-3424.

For the period code below, use : Jan.-June (1); July-Dec. (2); or all year (3)

DOT Shipping Name / Waste name	EPA Waste codes	Amount shipped in kilograms	Number of shipments	TSDF EPA ID number	Transporter EPA ID number	Period code	Handling code
Chlorethylene Still Bottoms	F002	--	-	TND 04-949-5138	--	3	

Certification: I certify that the above information is true, accurate and complete. (Sign by owner or manager and give title and date.)

Russell Plant Manager 5/19/86

TN 2118b, 3004 (Rev. 01/85)

No Shipments Reported

HSSM

DSWM L.C

Hazardous Waste Stream Description

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customer Service - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility.
INTERSTATE PACKAGING COMPANY

EPA identification code
TND 04-949-5138

2. Waste name. Use standard name from regulations whenever possible.
Perchloroethylene Still Bottoms

Waste Stream ID: 1

EPA waste code: F002

3. Give the years that this waste has been generated, e.g. 1975, 1982-1984, June 1985-
1969 -

4. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.
Ignitable (a). EP toxic (b). Corrosive (c). Reactive (e). Otherwise toxic (f).

5. Physical form
Solid

Percent solid
90%

9-90

6. Generation rate in kilograms (KG). Supply both rates.
Monthly Maximum: 90
Annual average: 960

Volume to weight conversion (pounds per gallon)
10

7. Maximum amount stored in kilograms
900

Minimum days stored
360

Frequency of generation
Continuous Accidental Various

8. DOT shipping name
Waste Perchloroethylene

DOT hazard class
ORM-A

DOT ID. code
UN 1897

9. Describe generation process.

~~DISTILLATION STILL BOTTOMS~~

Items 10/14 on back. Below is for department use only.

10. Complete? Yes No | Test results? Yes No | Reasonable? Yes No | Follow-up Yes No | Dot Haz. Class: 12 | Initials: LRJ

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8)

Status Code: 6

Date Received: 5-24-86

10. Comments.

PH-2022 (SWM 12/85 Rev.)

DSWM L&C

Hazardous Waste Stream Description

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37210-5403

1. Organization's full name at facility.
INTERSTATE PACKAGING COMPANY

EPA identification code
TND 04-949-5138

2. Waste name. Use standard name from regulations whenever possible.
Perchloroethylene, Spent

Waste Stream ID: X3

EPA waste code: F002

3. Give the years that this waste has been generated, e.g. 1975, 1982-1984, June 1985-
1969 -

4. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.
Ignitable (a). EP toxic (b). Corrosive (c). Reactive (d). Otherwise toxic (e).

5. Physical form: Liquid

Percent solid: 20%

3-20

6. Generation rate in kilograms (KG). Supply both rates.
Monthly Maximum: 720
Annual average: 36,000

Volume to weight conversion (pounds per gallon): 10

7. Maximum amount stored in kilograms: 180

Maximum days stored: 3

Frequency of generation: Continuous Accidental Various

8. DOT shipping name: Waste perchloroethylene

DOT hazard class: ORM-A

DOT ID. code: UN 1897

9. Describe generation process.

PHOTOPOLYMER PLATE WASHOUT

Lines 10/14 on back. Below is for department use only.

13. Complete?	Test results?	Reasonable?	Follow up	Dot Haz. Class	Initials
Yes No	Yes No	Yes No	Yes No	12	LRJ

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8).

Status Code: 6

Date Received: 6-2-86

16. Comments.

HW-2022 (SWM 12/85 Rev.)

For Department Use	Date received	Amount	Receipt #	Comments
	5/6/87	8		DSWM C&C

PH 2128. SWM (Rev 11/86)

Hazardous Waste Stream Description

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility. — EPA identification code
Interstate Packaging Co. — TND 049495138

2. Waste name. Use standard name from regulations whenever possible. — Waste Stream ID: 2 — EPA waste code: D001
Waste Flam Liquid (Alcohol)

3. Give the years that this waste has been generated, e.g. 1975, 1982-1984, June 1985-

4. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.
Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Otherwise toxic (f).

5. Physical form — Percent solid

6. Generation rate in kilograms (KG). Supply both rates. Monthly Maximum — Annual average — Volume to weight conversion (pounds per gallon)

7. Maximum amount stored in kilograms — Maximum days stored — Frequency of generation: Continuous Accidental Various

8. DOT shipping name — DOT hazard class — DOT ID. code

9. Describe generation process.

Lines 10/14 on back. Below is for department use only.

13. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Initials
Yes No	Yes No	Yes No	Yes No		AEB

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8)

Status Code	Date Received
9	8-21-86

15. Comments.

PH-2022 (SWM 12/85 Rev.)

Hazardous Waste Stream Description

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility. | EPA Identification code
Interstate Packaging Co. | TND 049495138

2. Waste name. Use standard name from regulations whenever possible. | Waste Stream ID | EPA waste code
Spent Perchloroethylene | 3 | F002

3. Give the years that this waste has been generated, e.g. 1973, 1982-1984, June 1985-

4. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.
Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Otherwise toxic (f).

5. Physical form | Percent solid

6. Generation rate in kilograms (KG). Supply both rates. Monthly Maximum | Annual average | Volume to weight conversion (pounds per gallon)

7. Maximum amount stored in kilograms | Maximum days stored | Frequency of generation
Continuous Accidental Various

8. DOT shipping name | DOT hazard class | DOT ID. code

9. Describe generation process.

Lines 10/14 on back. Below is for department use only.

13. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Initials
Yes No	Yes No	Yes No	Yes No		AEB

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8)

Status Code	Date Received
9	8-21-86

10. Comments.

PH-8022 (SWM 12/85 Rev.)

[illegible] Page 1 of 1

EPA ID CODE TND 04-989-5138 Y- -N
[illegible]ATE PACKAGING COMPANY
[illegible]USSELL/LARRY
[illegible]SON
[illegible]AG

TN 37187

Please complete and return this form to the following address:

Tennessee Department of Health and Environment
Division of Solid Waste Management
Customs House, Fourth Floor
701 Broadway
Nashville, Tennessee 37219-5403

MAY 28 1986

If the information on the label is incorrect, see instructions.
For technical assistance, call (615) 741-3424.

Waste Name	EPA Waste Code(s)	Amount generated during 1985 (in kg)	Amount on-site on 01/01/85 (in kg)	Amount on-site on 12/31/85 (in kg)	Waste mgt. methods
Perchloroethylene, Still Bottoms	F-002	980	1700	2680	H01 ~~H09~~
Perchloroethylene, Spent	F-002	36,000	0	0	H09
* Perchloroethylene is distilled and re-used.					

Certification. I certify that, if I am a generator of more than 1,000 kg of hazardous waste a month or lesser amounts of acutely hazardous waste as identified in 1200-1-11-.02(1)(c)5, I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. I certify that the above information is true, accurate and complete. (Sign by owner or manager.)

Larry Russell — Plant Manager — 5/22/86

PH 2575, SWF (12/85)

DSWM
L&C

PUBLIC NOTICE

The Commissioner of the Tennessee Department of Health and Environment is hereby giving notice of this tentative decision to grant a variance from classification as a waste, for spent isopropyl alcohol and spent perchloroethylene, Hazardous Waste Codes D001 and F002 respectively, as generated at Interstate Packaging Co., Hwy. 47 N., P.O. Box AC in White Bluff, Dickson County, Tennessee 37183, because this hazardous material is recycled in a manner which will not pose a significant hazard to public health or the environment. This variance will only apply to the material identified in the request and only when it is managed as described in the request.

Interstate Packaging Co. generates two spent solvent waste streams in their manufacturing process. The spent perhloroethylene exhibits the hazardous characteristic of toxicity. The spent isopropyl alcohol exhibits the hazardous characteristics of ignitability. Both of these spent solvents are reclaimed and reused in manufacturing process.

The procedures for determining that certain hazardous materials that are being recycled will no longer be classified as wastes are provided in Tennessee Rule 1200-1-11-.01(4) Variance from Classification as a Waste.

Comments and/or requests for a hearing on this tentative decision will be accepted for 30 days ending at 4:30 p.m. SEP 24 1986 .

Comments or requests for a hearing should be sent to: Mr. Tom Tiesler, Director, Division of Solid Waste Management, Tennessee Department of Health and Environment, Customs House, 4th Floor, 701 Broadway, Nashville, Tennessee 37219-5403; phone (615) 741-3424.

The Commissioner will issue a final decision to either grant or deny the variance after receipt of comments and after the hearing (if any).

If you wish to review the draft variance, or wish further information, please contact: Division of Solid Waste Management Regional Office, Tennessee Department of Health and Environment, Customs House, B-30, 701 Broadway, Nashville, TN 37219; phone (615) 741-6649.

TY/ah/SW-154

DSWM L.C

NME

INSPECTION REPORT

SITE/OPERATION INSPECTED:

Interstate Packaging Company
IND 04 949 5138
P.O. Box AG
White Bluff, TN 37187

OWNER/OPERATOR/PRIMARY CONTACT:

Larry Robinson

DATE AND TIME OF INSPECTION:

December 2, 1985
11:00 am

REPORT PREPARED BY:

Tom Golden
701 Broadway, B-01
Nashville, TN 37219-5403
(615) 741-0654

NAMES AND AFFILIATIONS OF OTHER INSPECTION PARTICIPANTS:

None

PURPOSE OF INSPECTION:

This routine scheduled full inspection was conducted to evaluate Interstate's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

FACILITY DESCRIPTION:

Interstate prints labels in plastic and paper for the packaging of various products. A D001 solvent from cleanup operations is generated and a F002 perchlorethylene from printing plate etching operations is produced.

Interstate Packaging has a variance on both the D001 and the F002 waste. The only waste generated is F002 perchlord still bottoms.

INSPECTION FINDINGS:

No violations were found

Tom Golden

Tom Golden

December 4, 1986

TG/kk

Dickson Co.

22-38 File

DSWM
L&C

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

January 6, 1987

Mr. Larry Robertson
Interstate Packaging Co.
P.O. Box AG
White Bluff, TN 37187

Dear Mr. Robertson:

The Division of Solid Waste Management has completed the required procedures necessary for issuance of a variance from classification as a waste. Your request for a variance for spent perchloroethylene, Hazardous Waste Code F002, and spent isopropyl alcohol, Hazardous Waste Code D001, is hereby granted but only applies to the recycled wastes as described in your variance request.

We appreciate your efforts to manage your hazardous waste in the manner which allows recovery rather than disposal. We also thank you for your patience in regard to the time involved in reaching this final decision.

Sincerely,

Tom Tiesler, Director
Division of Solid Waste Management

TT:Y/ah/SWM-69

cc: Joe Walkup, Nashville Field Office

Hazardous Waste Notification

DSWM L.C

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Cordell Hull Building - Fourth Floor, 702 Broadway, Nashville, Tennessee 37219-5403

1. Organization's full, legal name INTERSTATE PACKAGING COMPANY		EPA identification code TND 04-949-5138	
2. Mailing address P. O. BOX AG	City WHITE BLUFF	State abbrev. TN	ZIP code 37187
3. Physical location or address HWY. 47N, WHITE BLUFF, TN		County name DICKSON	
4. Owner name JERALD DOOCHIN		Phone with area code (615) 797-3141	
5. Manager or operator name RAY RUSSELL		Phone with area code (615) 797-3141	
6. Principal technical contact SAM RUSSELL/LARRY ROBERTSON		Phone with area code (615) 797-3141	

7. Number of employees	Year operation began	SIC codes (Primary SIC first,etc.)	Job shop
84	1969	2643	Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	SAM RUSSELL		(615) ~~440~~ 6024 777
b.	LARRY ROBERTSON		(615) 763-2851
c.			
d.			

9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Ray Russell	PLANT MANAGER	5/05/87

Below is for Department use only.	11. Date received	County code	Priority	Generator	Small Generator	Special status
	5/6/87	22	—	Yes (No)	Yes (No)	

12. Date closed | Date regulated | Date deregulated

13. Comments

Hazardous Waste Stream Report

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Cordell Hull Building - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

RECEIVED

1. Organization's name. INTERSTATE PACKAGING COMPANY	EPA identification code TND 04-949-5138
2. Waste name. Use standard name from regulations where possible. PERCHLOROETHYLENE STILL BOTTOMS	Waste Stream ID code [redacted] 1
3. Give the years that this waste has been generated. e.g. 1973, 1982-1984. 1969-[redacted]	Frequency of generation Continuous Accidental (Various)
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), (Other toxic) (f)	EPA waste codes. (Primary first) F002

5. Physical form	Percent solid	Volume to weight conversion (pounds per gallon)
SOLID 9	90+	10

6. Generation rates. Supply all rates in kilograms. Monthly maximum	Annual average	Maximum amount stored onsite	Maximum days stored
90 (kg)	960 (kg)	900 (kg)	360

7. DOT shipping name	DOT hazard class		DOT ID code
WASTE PERCHLOROETHYLENE	ORM	12 A	UN 1897

8. Describe generation process.

DISTILLATION STILL BOTTOMS

*** ANNUAL REPORT SECTION *** Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off-site, also submit Annual Shipping Report for hazardous waste generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on-site on first day of year (kg)	Amount on-site on last day of year (kg)	Waste management methods or TSDF handling codes
1984	880	40	920	T 54

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

Hazardous Waste Stream Report

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Cordell Hull Building - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's name. INTERSTATE PACKAGING COMPANY	EPA Identification code TND 04-949-5138
2. Waste name. Use standard name from regulations whenever possible. WASTE INK	Waste Stream ID code 2
3. Give the years that this waste has been generated. e.g. 1975, 1982-1984. 1969-	Frequency of generation (Continuous) Accidental Various
4. Circle all appropriate hazard criteria below. (Ignitable) (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f)	EPA waste codes. (Primary first) D001

RECEIVED AUG 25 1987 DIV. OF SWM

5. Physical form	Percent Solid	Volume to weight conversion (pounds per gallon)
LIQUID	10	8

6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
		300	3

7. DOT shipping name	DOT hazard class	DOT ID code
INK WASTE		

8. Describe generation process.

FLEXOGRAPHIC PRINTING

ANNUAL REPORT SECTION Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off-site, also submit Annual Shipping Report for hazardous waste generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on-site on first day of year (kg)	Amount on-site on last day of year (kg)	Waste management methods or TSDF handling codes
1986	8,000	40	280	H 09

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

Hazardous Waste Stream Report

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's name. INTERSTATE PACKAGING COMPANY	EPA identification code TND 04-949-5138
2. Waste name. Use standard name from regulations whenever possible. PERCHLOROETHYLENE	Waste Stream ID code 3
3. Give the years that this waste has been generated, e.g. 1973, 1982-1984. 1989 - 1994	Frequency of generation Continuous Accidental Various
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f)	EPA waste codes. (Primary first) F002

5. Physical form	Percent solid	Volume to weight conversion (pounds per gallon)
LIQUID	-	10

6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
		320	2

7. DOT shipping name	DOT hazard class	DOT ID code
WASTE PERCHLOROETHYLENE	ORM	UN 1897

8. Describe generation process.

PHOTOPOLYMER PLATE WASH

RECEIVED AUG 25 1997 DIV. OF SWM

ANNUAL REPORT SECTION Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off-site, also submit Annual Shipping Report for hazardous waste generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on-site on first day of year (kg)	Amount on-site on last day of year (kg)	Waste management methods or TSDF handling codes
1996	5600	52	0	H 09

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

DSWM L&C

RESOURCE CONSULTANTS
environmental engineers and scientists

DELIVERY ADDRESS
Administrative Services • Laboratory Services • CHEMTOX®
7123 Cross Roads Boulevard • Brentwood, TN 37027
(615) 373-5081 • FAX (615) 370-4339
Consulting and Engineering Services
171A General George Patton Drive • Brentwood, TN 37027
(615) 373-9919 • FAX (615) 370-9198
120 Southgate Court • Brentwood, TN 37027
(615) 370-6260 • FAX (615) 373-9645

February 25, 1993

25 Years of Excellence
Est. 1967

Mr. Tom Tiesler
Tennessee Department of Environment and Conservation
Division of Solid Waste Management
401 Church Street
Fifth Floor - L & C Tower
Nashville, Tennessee 37243-1535

RE: Hazardous Waste Notification
Interstate Packaging Company, White Bluff, TN
TND 04-949-5138

Dear Mr. Tiesler:

Enclosed please find the 1992 Hazardous Waste Notification for Interstate Packaging Company (IP) in White Bluff, Tennessee. Based on a phone conversation between our office and Wayne Gregory with the Solid Waste Division, it has been determined that the clean-up solvent added to the cycle is defined as a hazardous waste. Therefore, IP is no longer a Conditionally Exempt Small Quantity Generator. However, they are still a small quantity generator. IP also plans to submit a variance request in the very near future which will return them to the exempt status.

Also enclosed are revised Hazardous Waste Stream Reports for Waste Stream 2 for 1990 and 1991. These revised forms are based on the recent interpretation that clean-up solvent added to the cycle between clean-up and recovery in the still is defined as a hazardous waste.

In addition, a check has been enclosed for the 1992 fees of $350, as well as the $350 fee for 1990 and 1991 each. Therefore, a total of $1,250 is being submitted at this time.

If you should have any questions or require any additional information, please call.

Sincerely,

RESOURCE CONSULTANTS, INC.

Jeffrey H. Twaddle, P.E.
Consultant

JHT/lcl
Enclosure

cc: Mr. Mike Doochia, Interstate Packaging Company

MAR 1 - 1993

05044
L&C

Organization name (legal name) Interstate Packaging Company	EPA Identification Code TND 04-949-5138
Mailing address P.O. Box 16 — City White Bluff	State TN — Zip code 37187
Site address Hwy. 47N — City White Bluff	State TN — Zip code 37187 — County name Dickson
Latitude (degrees, minutes & seconds) 36°07' 15"	Longitude (degrees, minutes & seconds) 87°13' 20"
Owner name Jerald Duchild	Phone with area code 615 797-9000
Manager or operator name Ray Russell	Phone with area code 615 797-9000
Principal technical contact John Hoots	Phone with area code 615 797-9000
Number of employees 200 — Year operation began 1969 — SIC codes (Primary SIC first, etc.) 2643 — Job shop (Yes) No	
Emergency coordinator (for 24 hours per day and 7 days per week) Name — Time zones covered — Phone with area code	
Sam Russell	(615) 797-4024
John Hoots	(615) 952-3449

[illegible]

[illegible]

[illegible]

Certify that the information given in this document is true, accurate and complete. Signature of owner and operator (or) — Title: Vice President — Printing and typing name and date: 3-25-93

[illegible]

Date received — Country code — Area code — Phone number — Ext. — Special status

Date closed — Date registered — Date discontinued

Comments
Postmarked 3-26-93

MAR 1 - 1993

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

1. Organization's full name at facility. Interstate Packaging Company	EPA identification code TND 04-949-5138
2. Waste name. Use standard name from regulations whenever possible.	Waste Stream number 2
3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1969 / Date no longer generated. (MM/DD/YY)	Frequency of generation Continuous Accidental; One time (various)
4. Circle all appropriate hazard criteria below. (Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.) 0001 / SIC code for generating process. 2643

5. Physical Form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	Btu per pound
Liq-Othr (3)	10.0	.0	8,000		

6. Generation rates. Supply all rates in kilograms. Monthly Maximum (kg)	Annual average (kg)	Maximum amount stored on-site (kg)	Maximum days stored
305	305	0.0	0

7. DOT shipping name	DOT hazard class	DOT ID code
Ink Waste		

8. Describe generation process.

Clean-up solvent for flexographic printing operation and waste inks or recovered on-site with a still. Still bottoms non-hazardous and disposed of at Dickson County Bale Fill with special waste permit.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )
	<140°F		

Major and hazardous constituents. Give range of values at right.	Lower value	Upper value
a. NP Alcohol	90	98
b.		
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

Waste is recovered in a still and reused to clean presses. Clean up solvent added to system counted as hazardous waste.

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management, Customer Service - Fourth Floor, 701 Broadway, Nashville, TN 37243-1535

1. Organization's full name at facility. Interstate Packaging Company	EPA identification code TND 04-949-5138
2. Waste name. Use standard name from regulations whenever possible. Waste Ink Non-Hazardous Waste	Waste Stream number 2
3. Give the years that this waste has been generated, e.g. 1978, 1982-. 1969 - / Date no longer generated. (MM/DD/YY)	Frequency of generation: Continuous / Accidental/ One time / (Variable)
4. Circle all appropriate hazard criteria below. (Ignitable (a), or toxic (b), Corrosive (c), Reactive (d), TCLP (g).	EPA waste codes. (Primary first) D001 / SIC code for generating process. 2643

5. Physical form	Percent solids	Percent water	Vol. to wt. conversion (pounds per gallon)	If used for fuel, chlorine content	BTU per pound
Liq-Othr (3)	10.0 %	0 %	8,000	PPM	/lb.

6. Quantities value. Supply all values in kilograms. Monthly maximum	Annual average	Maximum amount stored on-site	Maximum days stored
305 (kg)	305 (kg)	0 (kg)	0

7. DOT shipping name	DOT hazard class	DOT ID code
Ink Waste		

8. Describe generation process.

Flexographic Printing — Waste ink and clean-up solvent recovered on-site in a still.
Still bottoms non-hazardous. Special waste permit for disposal at Dickson County Balefill. Clean-up solvent added to loop is defined as a hazardous waste.

9. Report annual generation and handling data. Complete at end of each calendar year. Continue waste stream description on back if more space is required.
Report annual generation and handling data. If the waste was shipped off-site, summarize in block (a) and submit an offsite shipping report. Report waste handling in blocks (b) - (d). For offsite or waste handling that requires interim status or a permit, use "I", "S", or "P" codes from the instructions. For other onsite handling, use "T" codes.

Report year	Amount generated during year (kg)	Amount on-site on first day of year (kg)	Amount on-site on last day of year (kg)
1991	3660	0	0

	Total Handled Offsite	TSDR handling/Waste management methods		Amount Handled Onsite	TSDR handling/Waste management methods
a.			b.	3660	H09
	Amount Handled Onsite	TSDR handling/Waste management methods		Amount Handled Offsite	TSDR handling/Waste management methods
c.			d.		

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

a. Reformulation/redesign of product	a( )	e. Improved operations	e(X)
b. In process recycling	b( )	f. No effort - explain impediments	f( )
c. Equipment/technology modification	c( )	g. Other - explain below:	g( )
d. Substituting raw materials	d( )		

11. Describe changes in volume and toxicity that these reduction efforts described in line 10 produced last year compared to the previous year. Amount of Reduction (kg)

22-[redacted] SP Waste NFO ✓

DSWM
NEAC

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
3000 MORGAN ROAD
JOELTON, TENNESSEE 37080

February 16, 1995

Mr. John Hoots
Interstate Packaging Company
Highway 47 North
White Bluff, TN. 37187

RE: Special Waste Approval
Cleaning Solvent Still Bottoms

Dear Mr. Hoots:

The Division of Solid Waste Management has received an application for special waste disposal regarding the above referenced waste. A review of the request reveals that the waste is not suitable for disposal at the Dickson County Balefill because current insufficient groundwater monitoring capabilities preclude this approval. Therefore, the request is denied.

If you have any questions, you can reach me at (615)299-8751.

Sincerely,

Frank J. Padovich

Frank J. Padovich
Environmental Specialist
Division of Solid Waste Management

FJP/memo/rmt

cc: DSWM - Central Office

File:
TND 04-949-5138

INTERSTATE PACKAGING
615/797-9000
FAX•615/797-9411

DSWM
L&C

September 6, 1995

Mr. Bobby W. Morrison, Manager
Department of Environment & Conservation
Division of Solid Waste Management
5th Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Dear Mr. Morrison:

This will confirm your telephone conversation with our consultant, Billy Nichols of Resource Consultants, on September 5, 1995.

As he stated, Interstate Packaging has decided to withdraw its request for variance from the hazardous waste regulations concerning its alcohol reclamation process. We understand that should we determine that we may might qualify for a variance in the future, our request would be considered without prejudice regarding the withdrawing of this current request.

If there are any questions regarding this letter, please contact Billy Nichols, or Terry Spector of Interstate Packaging. We appreciate your assistance in this matter.

Sincerely,

Michael Doochin

Michael Doochin

MD/ds

RECEIVED
SEP 11 1995
Div. of
Solid & Hazardous Waste

2285 HIGHWAY 47 NORTH
P.O. BOX AG WHITE BLUFF, TN 37187

DSWM
L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Annex, 401 Church Street, Nashville, TN 37243-1535
If data is incorrect, please change, certify and return. Retain a copy of any changes.

1. Generator's full legal name: INTERSTATE PACKAGING			EPA Identification code: TND 04-949-5138
2. Mailing address: PO BOX 789	City: WHITE BLUFF	State: TN	Zip code: 37187
3. Site address: HWY 47W, WHITE BLUFF, TN 37187	City: White Bluff	State: TN	Zip code: 37187
4. Latitude (degrees, minutes & seconds): 36.0424	Longitude (degrees, minutes & seconds): 87.1306		Country code: Dickson
5. Name (name from the corporation or company name): Interstate Packaging		Type:	Phone with area code: (615) 797-9000
6. Manager or operator name: RAY RUSSELL		Type:	Phone with area code: (615) 797-9000
7. Personal contact person: TERRY SPECTOR	FAX number with area code: 615 797-9411		Phone with area code: (615) 797-9000
8. Number of employees: 225	Year operation began: 1969	Site status (Primary SIC code): 4783	Job shop: (Y) Yes No
9. Operating schedule for 24 hours per day and 7 days per week			
Shift	Time period covered	Phone with area code	
a. RAY RUSSELL	24 HOURS	(615) 797-4024	
b. JOHN HOBBS	24 HOURS	(615) 952-3449	
c.			
d.			

10. Do you receive RCRA hazardous waste from others and recycle it? Yes No (X)

11. Hereby that the information given in this statement is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Ray Russell	VICE PRESIDENT	2/15/96

Date received	Country code	Priority	Generator	Transporter	Special status
04-22-1996	2		Yes No /	Yes No /	(N)
Site status	RCRA status	Transporter status			

12. Comments

RECEIVED
RDA 2208
FEB 22 1996
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

1. Organization's full name at facility: INTERSTATE PACKAGING
EPA identification code: TND 04-949-5138

2. Waste name. Use standard name from regulations whenever possible.: FLAMMABLE INKS (WASTE)
WASTE STREAM NUMBER: 002

3. Give the years that this waste has been generated, e.g. 1975, 1982: 1969
Date no longer generated (MM/DD/YY):
Annual frequency of generation: Continuous, Accidental, Various, One-time

4. Circle all applicable hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g).
EPA waste codes. (Primary first; six maximum.): D001
SIC code for generating process: 2643

5. Physical form code: LIQUID
% Solid: 10-20%
% Water:
Vol. to wt. conversion (pounds/gallon): 9
Used for the chlorine content (PPM):
BTU per pound:

6. Generation rates in kilograms
Waste generated (kg): 531 KG
Average storage (kg): 2,125 KG
Maximum stored (kg):
Maximum days stored: 30

7. DOT shipping name: WASTE FLAMMABLE LIQUID N.O.S.
DOT hazard class: FLAMMABLE LIQUID
DOT I.D. code: 3 UN1993

8. Describe the generation process.
FLEXOGRAPHIC PRINTING WASTE INKS FROM CLEANING PRESSES AND PANS

9. Chemical Characteristics
pH:
Flash point: 140°
Reactive code: 0
Concentration units: use PPM for TCLP and EP Toxic wastes. % volume, % weight, PPMW

Major and hazardous constituents. Give range of values at right.
Lower value, Upper value

a. ETHANOL
b. N-PROPANOL
c. PROPYL ACETATE
d.
e.

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.
S01, T50

RECEIVED

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FEB 22 1996
Div. of
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
First Floor, A & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name (if any): INTERSTATE PACKAGING
   EPA identification code: TND 049-949-5138
2. Waste name, use common name from regulations whenever possible: UV WASH UP
   WASTE STREAM NUMBER: 004
3. Give the years that this waste has been generated, e.g. 1976, 1982: 1993
   Date no longer generated (MM/DD/YY):
   Annual frequency of generation: Continuous / Accidental / Various / One time
4. Check all appropriate hazard codes below: Ignitable, EP toxic, Reactive, Corrosive, Toxic, Dioxin, Other toxic, TCLP (ppm) 4
   EPA waste codes (Primary type, six maximum): D001
   SIC code for generating process: 2752
5. Physical form code: LIQUID 3
   % Solid: 0
   % Water: 100
   Wt. to vol. conversion (pounds/gallon): 8.5
   If used for tum. chrome content (PPM): 0
   BTU per pound: 0
6. Container types in kilograms, Fiberboard, Steel: 212 KG
   Annual average (kg): 1,273 KG
   Maximum stored onsite (kg): 212
   Maximum days stored: 30
7. DOT shipping name: WASTE FLAMMABLE LIQUID N.O.S.
   DOT hazard class: FLAMMABLE LIQUID
   DOT ID code: 3 UN1993
8. Describe the generation process: MATERIAL USED TO CLEAN UV PRESSES AND PANS.
9. Chemical Characteristics:
   Flash point: 140F
   Reactive code: 0
   Concentration units. Use PPM for TCLP and EP Toxic wastes % (volume), % (weight), PPM(V)
   Major and hazardous constituents. Give range of values if high.
   lower value / upper value
   N-PROPANOL
10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.
    S01, T30, T31

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Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name at facility:
INTERSTATE PACKAGING

EPA identification code:
TND 04-949-3138

2. Waste name. Use standard name from regulations whenever possible:
POLYSAFE SOLVENT RECLAIMED

WASTE STREAM NUMBER:
005

3. Date the waste has been generated, e.g. 1978, 1982:
1989

Date no longer generated: MM/DD/YY:
03/11/95

Annual Frequency of generation:
Accidental / Various / One time

4. Class of maximum hazard (Highest Hazard): Ignitable, RP Toxic Ext, Corrosive rxt, Reactive rxt, Other toxic rxt, TCLP rxt.
A

EPA waste code: (Primary first; rxt maximum)
D001

SIC code for generating process:
2843

5. Physical form code: LIQUID (3)

% Solids:

% Water:

Vol. to wt. conversion (pounds/gallon):
8.5

If used for fuel, chlorine content (PPM):
0

BTU per pound:

6. Generation rates in kilograms: Monthly maximum (kg):
270.45 KG.

Annual average (kg):
540.90 KG

Maximum stored onsite (kg):
270.45 KG.

Maximum days stored:
30

7. DOT shipping name:
WASTE FLAMMABLE LIQUID, N.O.S.

DOT hazard class:
FLAMMABLE LIQUID 3

DOT ID code:
UN1993

8. Describe the waste stream process:

PLATE MAKING SOLVENT THAT WAS RECLAIMED THIS IS NO LONGER USED.

9. Chemical Characteristics:

pH:

Flash point:
140F

Reactive sulfide:
0

Concentration units. Use PPM for TCLP and EP Toxic wastes (% volume), (% weight), (PPM)

Major and hazardous constituents. Give range of values if ppm:

		Lower value	Upper value
a.	D-LIMONENE		
b.	PHENOL, ETHER ACETATE		
c.			
d.			
e.			

10. Describe how you have managed or plan to manage this waste through final disposition. Choose Waste Management Method Codes on page 9 of the instructions.

S01, T21 D81

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DIV. OF SOLID WASTE MGMT.

PAGE 1 OF 1

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
First Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name of facility: INTERSTATE PACKAGING
EPA identification code: TND 04-949-5138

2. Waste name, use standard name from regulations whenever possible: ACCUDYNE INKS AND PENS
WASTE STREAM NUMBER: 006

3. Enter the years that this waste has been generated, e.g. 1975, 1992: 1991
Date no longer generated, (MM/DD/YY):
Annual Frequency of generation: Continuous / Accidental/ Gas line / Various

4. Code of dangerous hazard control source: A
EPA waste codes, (Primary first; see manual): D001, D003, F003, F005
SIC code for generating process: 2843

5. Physical form code: 3 LIQUID
% Solid: 20-30%
Vol. to wt. conversion, Pounds/gallon: 8.3
If used for fuel, % chlorine content/PPM: 0
BTU per pound:

6. Generation rates in kilograms: Monthly maximum (kg): 113.99
Annual average (kg): 115.90
Maximum stored inside (kg): 0
Maximum dove stored: 30

7. DOT shipping name: WASTE FLAMMABLE LIQUID N.O.S.
DOT hazard class: FLAMMABLE LIQUID 3
DOT ID code: UN1993

8. Describe the generation process: INKS USED TO TEST G.C. MACHINE. PENS USED TO TEST DYNE LEVEL ON THE FILM

9. Physical Characteristics:
Flash point: 140°
Reactive code: 0
Concentration units. Use PPM for TCLP and EP Toxic wastes (% volume), % weight), PPM): %

10. Enter any hazardous constituents. Give range of values at right.

	Lower Value	Upper value
a. METHANOL		
b. ISOPROPYL ALCOHOL, METHANOL		
c.		
d.		
e.		

11. Confirm that you have indicated standard or manage this waste through final disposition. See the Waste Management Notice Checklist page 3 of the instructions.

SOL, TSD

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Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Generator's full name or factory: INTERSTATE PACKAGING	EPA identification code: TND 04-949-5138
2. Waste name, and standard name (NA, regulations, whenever possible): BASF NYLOSOLV	WASTE STREAM NUMBER: 007
3. Give the date that this waste was first generated, e.g. 10/5, 1993: 1993	Date no longer generated: MM/DD/YY: 07/20/93
	Annual frequency of generation: Continuous, Seasonal, Various, One time
4. Code of predominant hazard (circle one): Generator (ignitable, EP toxic (tox), Corrosive (c)), Receiver (ignitable, Other toxic (t), TCLP (tc)) A	EPA waste codes. (Primary first; six maximum.): D001
	SIC code for generating process: 2643

5. Physical form code	% Solid	% Water	Vol. % wt. corrected lb/bbl/gallon	If used fuel, chlorine content PPM	BTU per pound
LIQUID (3)			8.3	0	0

6. Generation rate in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
487.50	637.50	0	0

7. DOT shipping name	DOT hazard class	DOT ID code
WASTE FLAMMABLE LIQUID N.O.S.	FLAMMABLE LIQUID 3	UN 1993

8. Describe the generating process:

SAMPLE MATERIAL USED ONE TIME FOR TESTING

9. Physical characteristics	Flash point	Reactive code	Concentration units: Use PPM for TCLP and EP Tox wastes (% volume, % weight, PPM)
	140F	0	V

Major and hazardous constituents. Give range or values at right.	lower value	upper value
A. SOLVENT NAPTHA		
B. PENTANOL		
C.		
D.		
E.		

10. Describe how you have managed or plan to manage this waste through final disposition, using the Waste Management Method Codes on page 2 of the instructions.

001, T50

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APR 01
Solid Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

Organization's full name or facility:
INTERSTATE PACKAGING

EPA Identification code:
TND 04-949-5138

Waste name. Use standard name (with regulations) whenever possible.
MURIATIC ACID/WATER

WASTE STREAM NUMBER
008

Date you began (or will begin) generating this waste (mm/dd/yy):
1995

Date no longer generated (mm/dd/yy):
07/26/95

Ahnual frequency of generation: Continuous, Accidental, Various
Continuous

Code of appropriate hazardous waste table: Table 261.31, EP toxic (D), Table 261.32, Listed (F, K, U), Table 261.33, Table 261.24, TCLP (D)

EPA waste codes. (Primary first, at maximum 4.)
D002

SIC code for generating process:
2543

Physical form code: L = Liquid, S = Solid, SL = Sludge
LIQUID

% liquid: 9

% solids:

Avg. specific gravity (water=1.0000):

Ignitability (PPM): 0

BTU per pound:

Generation rate in kilograms. Maximum monthly: 378.72 KG

Annual average kg: 372.72

Maximum storing grade kgs:

Maximum days stored: 0

DOT hazard class: CORROSIVE LIQUID

DOT ID code: 8 UN1760

DOT shipping name:
WASTE CORROSIVE LIQUID N.O.S.

Describe the generation process:

ONE TIME THIS WAS USED TO CLEAN A/C LINES

Average characteristics:

pH: 1.4

Flashpoint: 200°

Reactive code: 0

Concentration units. Use PPM for TCLP. Use EP toxic wastes in volume(%), % weight(%), PPM(1).

Other characteristics. Give range of values at right.

	lower value	upper value
1.		
2.		
3.		
4.		
5.		

Describe how you have managed or could be managing this waste through final disposition. Use the Waste Management Method Codes (Appendix B of the instructions).

301, 531

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Hazardous Waste Notification

DSWM L&C

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower: 401 Church Street: Nashville, TN 37243-1535

~~Please complete and/or correct, certify and return. Retain a copy for your records.~~

1. Organization's full, legal name	Installation identification no.
INTERSTATE PACKAGING	TND 04-949-5138

2. Mailing address	City	State	Zip code
PO BOX 789	WHITE BLUFF	TN	37187

3 a. Site address	City	State	Zip code	County name
HWY 47N, WHITE BLUFF, TN 37187				Dickson

b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)
36.0624	87.1306

4. Owner name (may be corporation or company name)	Type	Phone with area code
JERALD DOOCHIN		(615) 797-9000

5. Manager or operator name	Type	Phone with area code
INTERSTATE PACKAGING		(615) 797-9000

6. Principal technical contact	FAX number + area code	Phone with area code
TERRYM SPECTOR	(615) 797-9411	(615) 797-9000

7. Number of employees	Year operation began	SIC codes (Primary SIC first,etc.)	Job shop
210	1969	2643, 2752,	Yes No (Y)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	SAM RUSSELL	24 HOURS	(615) 797-4024
b.	JOHN HOOTS	24 HOURS	(615) 952-3449
c.			
d.			

9. a. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ) No ( )
b. Do you recycle RCRA hazardous waste from onsite? Yes( ) No ( )

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
[signature]	Plant Mgr.	2/9/99

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
02/17/1999	22		Y	Y	

12. Date closed	TSDR status	Transporter status

13. Comments

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CN-0909(Rev.11/98)

RDA 2203

Group No._____ File No._____

ID No._____

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility: INTERSTATE PACKAGING
   Installation identification number: TND 04-949-5138

2. **Waste name**. Use standard name from regulations whenever possible.: WASTE INK
   WASTE STREAM NUMBER: 2

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.: 1969
   Date no longer generated. (MM/DD/YY):
   Annual **Frequency** of generation: Continuous ____ Accidental/ One time ____ Various (C)

4. Circle all appropriate **hazard criteria**. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). A
   EPA **waste codes**. (Primary first; six maximum.): D001
   SIC code for generating process.: 2643.

5. **Physical form** code: Liq-Othr (3)
   % Solid: 10.0
   % Water: .0
   Vol. to wt. conversion (pounds/gallon): 8.000
   If used for fuel, chlorine content(PPM): 0.0
   BTU per pound: 0.0

6. **Generation rates** in kilograms.

Monthly maximum (kg)		Annual average (kg)		Maximum stored onsite (kg)		Maximum days stored	
850.0	184.0	4,014.0	2,200.0	950.0	276.0	30	45

7. **DOT shipping name**: INK WASTE
   DOT hazard class: Flam/Comb Liquids 03
   DOT ID code: 1993

8. Describe the **generation process**.

FLEXOGRAPHIC PRINTING WASTE INK RECLAIMED ON-SITE. STILL BOTTOMS NON-HAZARDOUS. NP ALCOHOL IS USED TO CLEAN THE PRINTING PRESS. FLEXOGRAPHIC PRINTING WASTE INKSFROM CLEANING PRESSES AND PANS.

9. **Chemical Characteristics**.
   pH:
   Flash point: >140F
   Reactive code:
   Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) X (V)

Hazardous constituents. Give range of values at right.	lower value	upper value
A. ETHANOL		
B. N-PROPANOL		
C. PROPYL ACETATE		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

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FEB 17 1999

CN-0773 (Rev. 11/95)

Form Continues on the Back

Group No. RDA 2293 and 2497 File No.
ID No.
6(Y)

11. Annual Generation and Handling Data: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year 1998	A. Amount generated during year (kg)	B. Amount onsite Jan. 1 in temp. storage (kg)	C. Amount onsite Dec. 31 in temp. storage (kg)	D. Amount handled (kg)
	2,200.0	637.5	none	2,837.5

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	2,837.5 kg	S-01, T-50	D2	0 kg	
	Amount Handled ONsite	**TSDR handling/Waste management methods**		**Amount Handled ONsite**	**TSDR handling/Waste management methods**
D3	kg		D4	kg	

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
1.30 kgs. waste per 100 lbs. ink	.78	2001	

13. Identify the **efforts** undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product (A)
B. In process recycling (B)
C. Equipment/technology modification (C)
D. Substituting raw materials (D)
E. Improved operations (E)
F. Reduction research/planning (R)
G. No effort (F)
H. Other - briefly explain here (G)

14. Rate the **helpfulness** of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance A(No NA Yes)
B. Technical feasibility B(No NA Yes)
C. Economic practicality C(No NA Yes)
D. Measurement/accounting methods D(No NA Yes)
E. TN hazardous waste regulations E(No NA Yes)
F. Implementation experience F(No NA Yes)
G. High costs of haz. waste mgt G(No NA Yes)
H. Accidental generation H(No NA Yes)
I. Other - describe here: I (No NA Yes)

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
John S Hoa	Plant Mgr	2/9/99

Below is for Department use only.

17. Date received (MM/DD/YY)	Complete? Yes No	Test results? Yes No	Reasonable? Yes No	Follow-up Yes No	Initials
02/17/1999					DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8), Variance granted (9); Conditionally exempt (A); Mixed radiological wastes(R); Corrective Action (C); Waste water Rx(W); Universal Waste (U)

Status	Further Reporting

18. Comments.

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility INTERSTATE PACKAGING	**Installation identification number** TND 04-949-5138
2. **Waste name**. Use standard name from regulations whenever possible. UV WASH UP	WASTE STREAM NUMBER 4

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation
1993		Continuous ____ Accidental/ One time ____ Various (C)

4. Circle all appropriate **hazard criteria**. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). A	EPA **waste codes**. (Primary first; six maximum.)	**SIC code** for generating process.
	D001	2752,

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)			8.500	0.0	0.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
433.5 35.42	2,694.0 425.0	433.5 106.25	30 45

7. **DOT shipping** name	DOT hazard class		DOT ID code
WASTE FLAMMABLE LIQUID NOS	Flam/Comb Liquids	03	UN1993

8. Describe the **generation process**.

MATERIAL USED TO CLEAN UV PRESSES AND PANS.

9. **Chemical Characteristics**. pH	Flash point	Reactive code	**Concentration units**. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) X (P)
	140		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. N-PROPANOL		
B.		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

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DIV SOLID WASTE MGT
FEB 17 1999

CN-0773 (Rev. 11/95) Form Continues on the Back

Group No. RDA 2203 and 2497 File No.

ID No.. 0(7)

11. Annual Generation and Handling Data: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year 1998	A. Amount generated during year (kg)	B. Amount onsite Jan. 1 in temp. storage (kg)	C. Amount onsite Dec. 31 in temp. storage (kg)	D. Amount handled (kg)
	425.0	NONE	NONE	425.0

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	425.0 kg	S-01, T-50, T-31	D2	kg	
	Amount Handled ONsite	**TSDR handling/Waste management methods**		**Amount Handled ONsite**	**TSDR handling/Waste management methods**
D3	kg		D4	kg	

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
.25 kgs. waste ink per 100 lbs. ink	.15	2001	

13. Identify the **efforts** undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product (A)
B. In process recycling (B)
C. Equipment/technology modification (C)
D. Substituting raw materials (D)
E. Improved operations (E)
F. Reduction research/planning (R)
G. No effort (F)
H. Other - briefly explain here (G)

14. Rate the **helpfulness** of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance A(No NA Yes)
B. Technical feasibility B(No NA Yes)
C. Economic practicality C(No NA Yes)
D. Measurement/accounting methods D(No NA Yes)
E. TN hazardous waste regulations E(No NA Yes)
F. Implementation experience F(No NA Yes)
G. High costs of haz. waste mgt G(No NA Yes)
H. Accidental generation H(No NA Yes)
I. Other - describe here: I (No NA Yes)

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE: Plant Mgr	DATE: 1/9/99

Below is for Department use only.

17. Date received (MM/DD/YY)	Complete? Yes No	Test results? Yes No	Reasonable? Yes No	Follow-up Yes No	Initials
02/17/1999					DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8), Variance granted (9); Conditionally exempt (A); Mixed radiological wastes(R); Corrective Action (C); Waste water Rx(W); Universal Waste (U)	Status	Further Reporting

18. Comments.

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. **Organization's full name** at facility: INTERSTATE PACKAGING
   Installation identification number: TND 04-949-5138

2. **Waste name.** Use standard name from regulations whenever possible.: ACCUDYNE INKS AND PENS
   WASTE STREAM NUMBER: 5

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-.: 1991
   Date no longer generated. (MM/DD/YY):
   Annual **Frequency** of generation: Continuous Accidental/ One time Various ____ (V)

4. Circle all appropriate **hazard criteria.** Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). A
   EPA **waste codes.** (Primary first; six maximum.): D001,D003,F003,F005
   SIC code for generating process.: 2643.

5. **Physical form** code: Liq-Othr (3)
   % Solid: 20-30%
   % Water:
   Vol. to wt. conversion (pounds/gallon): 8.500
   If used for fuel, chlorine content(PPM): 0.0
   BTU per pound: 0.0

6. **Generation rates** in kilograms.
   Monthly maximum (kg): 115.9 NONE
   Annual average (kg): 115.9 NONE
   Maximum stored onsite (kg): 0.0 NONE
   Maximum days stored: 30

7. **DOT shipping** name: WASTE FLAMMABLE LIQUID NOS
   DOT hazard class: Flam/Comb Liquids 03
   DOT ID code: UN1993

8. Describe the **generation process.**

   INKS USED TO TEST G.C. MACHINE PENS USED TO TEST DYNE LEVEL ON THE FILM.

9. **Chemical Characteristics.**
   pH:
   Flash point: 140
   Reactive code:
   Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) X (P)

Hazardous constituents. Give range of values at right.	lower value	upper value
A. METHANOL		
B. ISOPROPYL ALCOHOL METHANOL		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

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FEB 17 1999

CN-0773 (Rev. 11/95)

Form Continues on the Back

RDA 2203 and 2497
Group No._____ File No._____
ID No._____ STYT

11. Annual Generation and Handling Data: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year	A. Amount generated during year (kg)	B. Amount onsite Jan. 1 in temp. storage (kg)	C. Amount onsite Dec. 31 in temp. storage (kg)	D. Amount handled (kg)
1998	NONE	NONE	NONE	NONE

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

D1	Total Handled OFFsite kg	TSDR handling/Waste management methods	D2	Amount Handled ONsite kg	TSDR handling/Waste management methods
D3	Amount Handled ONsite kg	TSDR handling/Waste management methods	D4	Amount Handled ONsite kg	TSDR handling/Waste management methods

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.

13. Identify the **efforts** undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product (A)
B. In process recycling (B)
C. Equipment/technology modification (C)
D. Substituting raw materials (D)
E. Improved operations (E)
F. Reduction research/planning (R)
G. No effort (F)
H. Other - briefly explain here (G)

14. Rate the **helpfulness** of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance A(No NA Yes)
B. Technical feasibility B(No NA Yes)
C. Economic practicality C(No NA Yes)
D. Measurement/accounting methods D(No NA Yes)
E. TN hazardous waste regulations E(No NA Yes)
F. Implementation experience F(No NA Yes)
G. High costs of haz. waste mgt G(No NA Yes)
H. Accidental generation H(No NA Yes)
I. Other - describe here: I (No NA Yes)

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
[signature]	Plant Mgr.	2/9/99

*** Below is for Department use only. ***

17. Date received (MM/DD/YY)	Complete? Yes No	Test results? Yes No	Reasonable? Yes No	Follow-up Yes No	Initials
02/17/1999					DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8), Variance granted (9); Conditionally exempt (A); Mixed radiological wastes(R); Corrective Action (C); Waste water Rx(W); Universal Waste (U)	Status	Further Reporting

18. Comments.

For wastes shipped offsite only.

1998 Offsite Shipping Report

Page 1 of 1

TND 04-949-5138 YYN- - Nashville FO

INTERSTATE PACKAGING
Attn: TERRYM SPECTOR
PO BOX 789
WHITE BLUFF, TN 37187

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

RECEIVED
DIV SOLID WASTE MGT
FEB 17 1999

File No. ____ Group No. ____ ID No. ____

2 Waste Streams or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility Installation ID	Transporter Installation ID	TSDR Handling Codes
a 002	WASTE INKS	D001	2,837.5	7	ALD981020894	GAD984322909	S-01, T-50
b 004	U.V. WASH UP	D001	425.0	2	ALD981020894	GAD984322909	S-01, T-50, T-31
c 006	LAB CHEMICALS	~~D-001, F003~~ D003, F005	0	0			
d							
e							
f							
g							
h							
3 Totals. Sum the two columns to the right.		2,962.5	9				
Page totals: sum the following two columns			2,962.5	9			
Final totals: sum all page totals on last page of report			2,962.5	9			

4 Certification I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Plant Mgr. 2/9/99

CN-0779 (Rev 11/94)

2203

1998 Offsite Shipping Report

For wastes shipped offsite only.

INSTRUCTIONS

Summarize your **offsite** shipments of hazardous wastes in 1998. This information must be obtained from, and accountable to, your hazardous waste manifest copies returned by the TSDR. You and your TSDR must reconcile any manifest differences and report only the mutually corrected amounts or else file manifest discrepancy reports. Document the reasons for any corrections by using TSDR analyses, actual weights from scale receipts, manifest changes, etc.

Complete one line for each combination of initial transporter and TSDR who handled a waste. If no shipments at all were initiated in 1998, write "No Shipments" in the DOT Shipping Name of line 2a and certify the report. If some wastes were shipped offsite, but others were not, omit those that were not shipped offsite.

Page _____ of ____ - Number each page in the space provided on the upper right side of the report.

Waste Streams or "FS" - Enter the source of the waste as the waste stream number from your Hazardous Waste Stream Report forms. For mixtures, enter as many numbers as appropriate. If the waste is being shipped directly from your RCRA permitted storage, enter "FS" (From Storage).

DOT shipping name/waste name - Enter only one of either the DOT shipping name or a descriptive waste name. Enter each different waste or waste combination on a separate line. Enter various mixtures of the same constituent wastes on the same line unless the hazard characteristics of the resultant mixtures are different.

EPA waste codes - Enter the applicable hazardous waste code(s) which identifies the waste or combination of wastes. See Rules 1200-1-11-.02(3) and (4) for the EPA waste codes. (For example, F001, K001, D001.)

Amount shipped (in kilograms) - Enter the amount of wastes in kilograms that you shipped during the reporting year to the specified TSD facility by the specified transporter. Use the Total Quantity (Item 13) from the Manifest after converting it to kilograms. The weight reported should include the weight of the drum unless you know that the waste will be removed from the drum and the drum will not be handled as a hazardous waste. For generators, this amount should match the total of lines 11D1 of the Waste Stream Reports that are included on this line. For TSDR's, it should match the lines on the Summary Report with the word "SHIPPED" in the handling column.

For conversion, 2.2 pounds equals one kilogram. Convert volume into weight in kilograms taking into account the appropriate density or specific gravity of the waste. For example, water weighs 8.34 lbs./gallon. A full 55 gallon drum of hazardous wastewater with a specific gravity of 1.02 should be reported as 55 gallons * 1.02 * 8.34 lb./gal ÷ 2.2lb./kg. = 212.67 or 212.7 kg.

Shipment - Enter the number of separately manifested shipments during the reporting year for each line completed.

TSDR ID number - Enter the Installation Identification Number of the treatment, storage or disposal facility/destination facility to which the waste was shipped. Enter only one number.

Transporter ID number - Enter the Installation Identification Number of the initial transporter who picked up the waste. Enter only one number.

Handling codes - Use the codes shown on page 6 of the instructions for the Hazardous Waste Stream Report. Enter the **TSDR Handling Codes** that most closely represent the techniques you contracted to be used at the facility that **received** this waste. Enter all codes that are applicable in the order of handling of the waste. Use only the TSDR Handling Codes and not the Waste Management Codes.

Totals - Sum the amount shipped and the number of shipments for each page and record the total of all pages on the last page.

Certification - The generator must sign the report and include the title and date signed. The certification must be made by one who is authorized to legally bind the company as when signing contracts.

1999 Hazardous Waste Generator Maintenance Fees

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

INSTRUCTIONS

Complete the following to determine if you owe the hazardous waste maintenance fee for generators. Return the certified form even if no fees are due.

1.1	Enter the number of months in 1998 that you generated more than 100 but less than 1000 kilograms of hazardous waste.	12
1.2	If you are a Conditionally Exempt Small Quanity Generator (CESQG), enter the number of months in 1998 that you accumulated at any time more than 1000 kilograms of non-acute hazardous waste.	0
1.3	Enter the number of months in 1998 that you generated 1,000 or more kilograms of hazardous waste.	0
1.4	Enter the number of months in 1998 that you generated 1 or more kilograms of acute hazardous waste, or 100 or more kilograms of a spill or residue of acute hazardous waste.	0
1.5	If you are a CESQG, enter one (1) if you received a Notice of Violation in 1998, other than for over-accumulation as expressed in line in 1.2 above.	0

Note: Wastes generated from the cleanup or containment of a Superfund site or a spill on public property shall be excluded from the above for the fee calculations only. Also, exlcuded are wastes listed under 1200-1-11-.02(1)(c)(ii) or 40 CFR 261.5 (c) & (d), incorporated by reference in 1200-1-11-.02(1)(a). For examples, wastes handled as H03, H05, H06 and H07; fly ash, drilling fluids, and cement kiln dusts; and still bottoms recycled onsite as long as the waste recycled has been counted once.

If all lines above are zero, you owe no fee. Enter zero on line 1 below and certify on line 2.

If either line 1.1 or 1.2 is greater than zero, and all lines 1.3 to 1.5 are zero, your are considered a small quantity generator for fee purposes. Enter $550 on line 1 below and certify on line 2.

If any line 1.3 to 1.5 is greater than zero, you are considered a large quantity generator for fee purposes. Enter $900 on line 1 below and certify on line 2.

Enter Name and Installation ID:	Please complete and return the original to the above address.
TND 04-949-5138 YYN- - Nashville FO INTERSTATE PACKAGING Attn: TERRYM SPECTOR PO BOX 789 WHITE BLUFF, TN 37187	For technical assistance, call 1-(800) 237-7018 (in Tennessee only.)

1. See the instructions to determine if you owe a hazardous waste generator maintenance fee. If you are a large quantity generator, enter $900. If you are a small quantity generator, enter $550. Else, enter zero. Submit the completed form with your check or money order payable to Treasurer, State of Tennessee. Do not send cash.	$550.00

2. Certify that the information given above is true, accurate and complete.

Signature of owner, manager or authorized representative.	Title	Date
[signature]	Plant Mgr	2/9/99

Below is for DEPARTMENT USE only.

CD No.	Date received	Amount	Receipt #	Comments
HSA 2335		550.00	H05549	

RECEIVED
DIV SOLID WASTE MGT
RDA 2203
FEB 17 1999

Group No._____ File No._____

ID No._____

CN-0906 (Rev. 11/95)

INTERSTATE PACKAGING
P.O. BOX AG
WHITE BLUFF, TENN. 37187

CHECK REQUISITION

TO: ACCOUNTS PAYABLE DEPARTMENT

PLEASE ISSUE A CHECK AS FOLLOWS:

AMOUNT: $ 550.00 DATED: 2/9/99

PAYABLE TO: Treasurer, State of Tennessee

FOR: 1998-1999- Hazardous Waste Generator Maintenance Fee -

Please return check to me for mailing I have forms that must go with it.

Thanks, Edna

TO BE CHARGED TO ACCOUNT NUMBER:

REQUESTED BY: Edna Dollard APPROVED BY:

DATE: 2-9-99 DATE:

RECEIVED
DIV SOLID WASTE MGT
FEB 17 1999

Group No. File No.

ID No.

Jim Higgins Printing, Burns, Tenn. 37029

Hazardous Waste Notification

Tennessee Department of Health and Environment, Division of Solid Waste Management
Customs House - Fourth Floor, 701 Broadway, Nashville, Tennessee 37247-3530

N/E W

1. Organization's full, legal name: Larry's Body Shop	EPA identification code: TN0 98 979 1008

2. Mailing address	City	State	Zip code
316 WestView Dr.	White Bluff	TN	37187

3 a. Site address	City	State	Zip code	County name
Presentview Rd.	White Bluff	TN	37187	Dickson

b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)

4. Owner name: Larry Christy	Phone with area code: 615-797-4141
5. Manager/or operator name: Larry Christy	Phone with area code: 615 797-4141
6. Principal technical contact: Larry Christy	Phone with area code: 615 797-4141

7. Number of employees	Year operation began	SIC codes (Primary SIC first, etc.)	Job shop
2	1990		Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	Larry Christy	Day	615-797-4141
b.	Larry Christy	Night	615-797-2111
c.			
d.			

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.

10. Check the activities below you are engaged in related to burning hazardous waste as a fuel.
a. Fuel blending or marketing of hazardous waste as a fuel. . . . . a( )
b. Transporting hazardous waste as fuel . b( )
c. Burning hazardous waste as fuel c( )

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Larry Christy	Owner	6-21-93

Below is for Department use only

12. Date received	County code	Priority	Generator	Small Generator	Special Status
7/1/93	22		Yes (No)	Yes (No)	(Y)

13. Date closed	Date regulated	Date deregulated	Inspection frequency Annual (A), FY90+2n (1), FY91+2n (2).	

14. Comments

PH-2019A (SWM Rev. 12-89)

JUL 1 1993

Hazardous Waste Stream Report

Tennessee Department of Health and Environment, Division of Solid Waste Management
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility. — Larry's Body Shop
EPA identification code — TNU 75-779-1168

2. Waste name. Use standard name from regulations whenever possible. — WASTE PAINT, PAINT THINNERS, PAINT RELATED MATERIAL
Waste Stream number — 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-. — Date no longer generated. (MM/DD/YY)
Frequency of generation — Continuous / Accidental/ One time

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f). — A, E
EPA waste codes. (Primary first) — D001, F003, F005
SIC code for generating process. — 7532

5. Physical form — LIQUID (3)
Percent solid — <5 %; Percent water — <5 %; Vol. to wt. conversion (pounds per gallon) — 8.5
If used for fuel. chlorine content — <10,000 PPM; BTU per pound — ~ 15,000

6. Generation rates. Supply all rates in kilograms.
Monthly maximum — 24 (kg); Annual average — 289 (kg); Maximum amount stored on site — 289 (kg); Maximum days stored — 365

7. DOT shipping name — WASTE PAINT RELATED MATERILA
DOT hazard class — FLAMMABLE LIQUID (07)
DOT ID code — NA1263

8. Describe generation process.

RESIDUE FROM SPRAY GUN, THINNER USED TO CLEAN EQUIPMENT

*** ANNUAL REPORT SECTION *** Complete at end of each year and when terminating business for a waste requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off site, also submit Annual Shipping Report Hazardous Waste Generators. For handling in a permitted facility, use "T", "S", or "D" codes from instructions. For other handling, use "N" codes from instructions.

Report year	Amount generated during year (kg)	Amount on site on first day of year (kg)	Amount on site on last day of year (kg)

	Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods
a		Y/N	T63, T16, T07
b			
c			
d			

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.
a. Reformulation/redesign of product . a( )
b. In process recycling. . . . . b( )
c. Equipment/technology modification . c( )
d. Substituting raw materials . . . .d( )
e. Improved operations. . . . . .e( )
f. No effort. . . . . .f( )
g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that these reduction efforts described in line 10 produced last compared to the previous year. Amount of Reduction (k

a. Increased toxicity-a( ), b. decreased toxicity-b( ), c. No change-c( ).

PH-2022(SW)

JUL 1 4 1993

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name: LARRY'S BODY SHOP	EPA identification code: TND 98-779-1068

2. Mailing address	City	State	Zip code
316 WESTVIEW DR.	WHITE BLUFF	TN	37187

3 a. Site address	City	State	Zip code	County name
PLESENTVIEW RD. WHITE BLUFF, TN 37187				Dickson

b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)
00.0000	00.0000

4. Owner name (may be corporation or company name)	Type	Phone with area code
LARRY CHRISTY		(615) 797-4141

5. Manager or operator name	Type	Phone with area code
LARRY CHRISTY		(615) 797-4141

6. Principal technical contact	FAX number with area code	Phone with area code
LARRY CHRISTY		(615) 797-4141

7. Number of employees	Year operation began	SIC codes (Primary SIC first, etc.)	Job shop
1	1981	7532, , ,	( ) Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	LARRY CHRISTY	DAY	(615) 797-4141
b.	LARRY CHRISTY	NIGHT	(615) 797-2111
c.			
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ) No (X)

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Larry W. Christy	owner	1-4-96

Below is for Department use only

11. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
01-24-1996	22		N	N	(N)

12. Date closed	TSDR status	Transporter status
07-01-1995		

13. Comments

Larry's Body Shop is out-of-business as of 7/1/95

RECEIVED
JAN 24 1996
DHQA 2208
Solid & Hazardous Waste

CR-0000 (Rev. 11/95)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility LARRY'S BODY SHOP	EPA identification code TND 98-279-1065
2. Waste name. Use standard name from regulations whenever possible. WASTE PAINT, PAINT THINNERS, PAINT RELATED MATERIAL	WASTE STREAM NUMBER 1
3. Give the years that this waste has been generated, e.g. 1975, 1982. 1995	Date no longer generated. (MM/DD/YY) 7-7-95
	Annual Frequency of generation Continuous Accidental/ One time Various
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). a	EPA waste codes. (Primary first; six maximum.) D001,F003,F005
	SIC code for generating process 3711, 7532

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
LIQ-OTHER	5	5	8.500	0.0	0.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
24.0	289.0	289.0	30

7. DOT shipping name	DOT hazard class		DOT ID code
WASTE PAINT RELATED MATERIAL	ORM-D	10	NA1263

8. Describe the generation process.

RESIDUE FROM SPRAY GUN & THINNER USED TO CLEAN EQUIPMENT.

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
	10		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A. TOLUENE	10	25
B. XYLENE	5	15
C. ALCOHOLS	5	15
D. PAINT PIGMENTS & RESINS	40	60
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

RECEIVED
JAN 24 1996
Div. of Solid & Hazardous Waste

CN-0773 (Rev. 11/95) Form Continues on the Back RDA 2203

4(1)

NEW

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37243-1535
Please complete and/or correct, certify and return regardless. Retain a copy for your records.

Key ALL

1. Organization's full name at facility.
LEXALITE INTERNATIONAL CORPORATION

EPA identification code
TND 98-777-7931

2. Waste name. Use standard name from regulations whenever possible.
Oil/Water, Trichloroethane

Waste Stream number
** 3

3. Give the years that this waste has been generated, e.g. 1975, 1982-.
1991

Date no longer generated. (MM/DD/YY)

Frequency of generation (V)
Continuous Accidental One time Various

4. Circle all appropriate hazard criteria below. Ignitable (a), HP toxic (b), Corrosive (c), Reactive (e), TCLP (g). **

EPA waste codes. (Primary first)
(F001)

SIC code for generating process.
3079

5. Physical form 3
LIQUID

Percent solid	Percent water	Vol. to wt. conversion (pounds per gallon)	If used for fuel. chlorine content	BTU per pound
%	22 %	5.5	2345 PPM	15,600 /lb.

6. Generation rates. Supply all rates in kilograms.

Monthly maximum	Annual average	Maximum amount stored on-site	Maximum days stored
(kg)	(kg)	(kg)	180

7. DOT shipping name
RQ Hazardous Waste, Liquid, N.O.S.

DOT hazard class
ORM-E ~~NA9189~~

12
07

DOT ID code
~~(F001)- (ERG 931)~~
~~(D018)~~ NA9189

8. Describe generation process.
Burst hydraulic line on injection molding machine resulting contaminated fluid.

*** ANNUAL REPORT SECTION *** Complete at end of each calendar year. Continue waste stream description start with line 11 on the back.

9. Report annual generation and handling data. If the waste was shipped off-site, summarize in block (a) and submit an Offsite Shipping Report. Report onsite handling in blocks (b) - (d). For offsite or onsite handling that require interim status or a permit, use "T", "S", or "D" codes from the instructions. For other onsite handling, use "H" codes.

Report Year	Amount generated during year (kg)	Amount on-site on first day of year (kg)	Amount on-site on last day of year (kg)
1991	413	0	0

	Total Handled Offsite		TSDR handling/Waste management methods		Amount Handled Onsite		TSDR handling/Waste management methods
a	413	T	T16	b	0	T	S01
	Amount Handled Onsite		TSDR handling/Waste management methods		Amount Handled Onsite		TSDR handling/Waste management methods
c		T		d		T	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

a. Reformulation/redesign of product . a [ ]
b. In process recycling. . . . . b [ ]
c. Equipment/technology modification . c [ ]
d. Substituting raw materials . . . . d [ ]
e. Improved operations. . . . . e [ ]
f. No effort - explain impediments. . f [ ]
g. Other - explain below: . . . . . g [X]

Accidental spill of materials.

11. Describe changes in volume and toxicity that these reduction efforts described in line 10 produced last year compared to the previous year.

Amount of Reduction (kg)

a. Increased toxicity a [ ] b. Decreased toxicity b [ ] c. No change c [ ] N/A

MAR 3 1992

WSR 3 THD 98-777-7984

12. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )
5.7			

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. Water		22%
b. Oil (Hydraulic)		78%
c. 111, Trichloroethane		1.6 G/KG
d. Perchloroethylene		0.6 G/KG
e.		

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

INCINERATION AS FUEL BY SAFETY KLEEN. At cement Plant Facility.

14. Describe storage, treatment, and disposal methods using codes in the instructions.

Location	Treatment codes	Storage codes	Disposal codes
On-site:		S01	
Off-site:	T16		

15. Identify transporters, TSDR operators and recyclers involved in handling this waste.

	Name and address	EPA identification code
Safety Kleen	777 Big Timber Road Elgin, IL 60123	ILD051060403
Safety Kleen	130-A Frontage Road Lexington, SC 29072	SCD077995488

16. Certification: I certify that this information is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
Dale A. Troppman	V.P.-Manufacturing	02-20-92

*** Below is for Department use only. ***

17. Date received (MM/DD/YY)	Complete?	Test results?	Reasonable?	Follow up	Initials
030392	Yes No	Yes No	Yes No	Yes No	DBM

Status: Not hazardous (1); Demonstrated not hazardous (2); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (B); Corrective Action (C); Waste water Ix (W).

Status	Further Reporting
1	2 W (7)

18. Comments.

RECEIVED 2-28-92 MAR 3 1992

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management, Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

DSWM

LL,L

1. Organization's full, legal name LEXALITE INTERNATIONAL CORPORATION			EPA identification code TND 98-777-7984
2. Mailing address PO BOX 498 10163 US 31 NORTH	City CHARLEVOIX	State MI	Zip code 49720
3 a. Site address 1 SUBSTATION RD, ~~DICKSON, TN 37055~~	City DICKSON	State TN	Zip code 37055
County name Dickson			
b. Latitude (degrees, minutes & seconds) ~~36.0000~~ ~~36° 01' 30"~~ 36.0136	Longitude (degrees, minutes & seconds) ~~-00.0000~~ ~~87° 19' 36"~~ 87.1936		
4. Owner name LEXALITE INTERNATIONAL CORPORATION			Phone with area code (616) 547-6584
5. Manager or operator name ~~GILL HARDWICK, PLANT MANAGER~~ CHUCK THOMPSON, PLT MGR			Phone with area code (615) 446-7733
6. Principal technical contact DALE THOMPSON			Phone with area code (616) 547-6584
7. Number of employees 45	Year operation began 1955	SIC codes (Primary SIC first, etc.) 3079,	Job shop Yes No (Y)

8. Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
a. ARNIE METTLES	24 HOURS	(615) 446-2497
b. MIDGE BROWN	24 HOURS	(615) 446-4164
c. ~~GILL HARDWICK~~ CHUCK THOMPSON	24 HOURS	(615) ~~446-6892~~ 446-7733
d. DALE A THOMPSON	~~SUN-SAT-EST~~ 24 HOURS	(616) 547-6584

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.
~~AIR PERMIT APPLICATION IN PROCESS.~~ AIR PERMIT #22-0080, EXP 3-1-98
STATE OF TN STORM WATER - NOI UNDER GENERAL PERMIT RULES

10. Check the activities below you are engaged in related to burning hazardous waste as a fuel.
a. Fuel blending or marketing of hazardous waste as a fuel . . . . . a( )
b. Transporting hazardous waste as fuel . b( )
c. Burning hazardous waste as fuel . . . c( )

11. Certify that the information given in this document is true, accurate and complete by signing and dating.
Signature of authorized representative
Title DALE A. THOMPSON VP - CORPORATE RESOURCES
Date 2-24-93

For Below is for Department use only

12. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
3-1-93	22		S	N	

13. Date closed	Date regulated	Date deregulated

14. Comments

CN-0909 (11/92)

MAR 1 1993

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535
If this complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility. *LEYALITE INTERNATIONAL CORPORATION*	EPA identification code *TNC 98-777-7984*
2. Waste name. Use standard name from regulations whenever possible. *OIL/WATER, TRICHLOROETHANE*	Waste Stream number *3*

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Frequency of generation
1992	12-31-92	Continuous / Accidental/ One-time / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
	F001.	*3079.*

5. Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
LIQUID-DEMI FLUID		*[illegible]*	*5.500*	*2,545.0*	*15,000.0*

6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored on-site (kg)	Maximum days stored
[illegible]	*[illegible]*	*0.0*	*180*

7. DOT shipping name	DOT hazard class		DOT ID code
RQ - HAZARDOUS WASTE, LIQUID, NOS	*O R M - E*	*12*	*NA9189*

8. Describe generation process.
BURST HYDRAULIC LINE ON INJECTION MOLDING MACHINE RESULTING CONTAMINATED FLUID. ~~*BURST HYDRAULIC LINE ON INJECTION MOLDING MACHINE RESULTING CONTAMINATED FLUID, BURST HYDRAULIC LINE ON INJECTION MOLDING MACHINE RESULTING CONTAMINATED FLUID.*~~

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )
5.0			

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. *WATER*		*22%*
b. *OIL (HYDRAULIC)*		*78%*
c. *TRI-CHLOROETHANE*		*1.0*
d. *PERCHLOROETHYLENE*		*0.5*
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.
INCINERATION AS FUEL BY ~~*[illegible]*~~ *AT CEMENT PLANT FACILITY.* ~~*INCINERATION AS FUEL BY SAFETY KLEEN, AT CEMENT PLANT FACILITY. INCINERATION AS FUEL BY SAFETY KLEEN, AT CEMENT PLANT FACILITY.*~~

Tennessee Division of Solid Waste Management

JUL 19 1993

COMPLIANCE MONITORING AND ENFORCEMENT ACTIVITY REPORT

DSWM LEC

EPA ID Number: TND98-777-7984 | Site Name: Lexalite International Corp.

Address: Gum Branch Rd., Dickson, TN 37055

am: Hazardous Waste [X] Solid Waste [ ]

Key Date: (MM-DD-YY) -> 3/16/93

Type of Evaluation

Evaluation Inspection ____|____|____

A. Full Checklist
1. HW Gen. . [1]
2. HW Trans. [2]
3. HW TSDF w/o GW . [3]
4. HW SQ Gen. . . . [4]
5. HW NON-NOT . . . [5]
6. SW Processing Facility [6]
7. SW Landfill. . . . . [7]
9. HW TSDF with GW . . . [9]

(Field Visits)

B. OTHER
1. Walk-Through Insp. [1]
2. Closure Eval. . . [2]
3. Post Closure Eval. [3]
4. Special Waste Eval. [4]
5. Part A Modification/Withdrawal Eval. [5]
6. Complaint Follow-up NOS . . . . . [6]
7. Emergency Response . . . . . [7]
8. Other (Describe in Comments) . . . . [8]
9. Land Disposal Restriction. . . . . [9]

Sampling Inspection ____|____|____

1. Generated Waste [1]
2. Received Waste [2]
3. Soil/Sediment . . . . [3]
4. Surface Water/Leachate [4]
5. Groundwater [5]
6. Ambient Air [6]
8 Samples

Special Inspection ____|____|____

1. Groundwater Monitoring . . . . . [1]
2. Other (Describe in Comments). . . [2]
3. Preliminary Geologic Evaluation . [3]
4. Final Geologic Eval. . . . [4]
5. GW - O & M . . . . . [5]
6. GW - CME . . . . . [6]

Records/Report Review ____|____|____

(Non-Permitting)
(In Office)

1. Closure Plans with Cost Estimates [1]
2. Post Closure Plans w/ Cost Estimates [2]
3. Financial Instruments . . . . . [3]
4. Other Required TSDF Plans . . . . . [4]
5. Special Waste Request . . . . . [5]
6. Landfill Permit/Operation Plans . . [6]
7. Manifest Reports . . . . . [7]
8. Manifest Records . . . . . [8]
9. GMM Data . . . . . [9]
10. GMM Plans . . . . . [10]
11. Other . . . . . [11]

Follow-up Evaluation ____|____|____

1. with Field Office Personnel Only. . [1]
2. with Central Office Personnel . . . [2]
3. Field Visit. . . . . [3]
4. Record Review. . . . . [4]

Incident Processing 3/16/93

1. Oral Complaint . . . . . [1]
2. Written Complaint . . . . . [2]
3. Emergency Response Call . . [3]
4. Other (Describe in comments) [4]

Miscellaneous ____|____|____

1. Facility Status Evaluation Meeting/Letters [1]
2. Other (Describe in comments below) . . . . [2]
3. Aborted Inspection . . [3]
4. Warning Letter . . . . [4]

Violation Codes: None [X]

Enforcement Actions	Date Action Taken	Scheduled Compliance Date	Actual Compliance Date
Notice of violation			
Compliance review meeting			
Referred to enforcement			

Comments: (continue on reverse side if necessary) Visit to check accidental spill and clean up progress.

Key over [ ]

Prepared by: Don Oglesby | Staff Id: 050 | Date: 4-12-93 | Field Office: Nashville

DSWM 66.6

NEW

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

1. Organization's full name at facility: LEYALITE INT'L CORPORATION
EPA Identification code: TND 98-777-7984

2. Waste name. Use standard name from regulations whenever possible.: HAZARDOUS WASTE - SOILS (ACETONE)
Waste Stream number: 7 (seven)

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1993
Date no longer generated. (MM/DD/YY): 6-9-93
Frequency of generation: Continuous / Accidental One time / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g). 9
EPA waste codes. (Primary first; six maximum.): F003
SIC code for generating process.: 3089

5. Physical form: SOLID (9)
% Solid: 100
% Water: 0
Vol. to wt. conversion (pounds/gallon):
If used for fuel, chlorine content (PPM): N/A
BTU per pound: N/A

6. Generation rates. Supply all rates in kilograms.
Monthly maximum (kg): ~~16,400 N/A~~
Annual average (kg): ~~16,400 N/A~~
Maximum amount stored onsite (kg): 16,400
Maximum days stored: 60

7. DOT shipping name: HAZARDOUS WASTE, SOLID, N.O.S.
DOT hazard class: ORM-E (12)
DOT ID code: NA9189

8. Describe generation process.

THIS WASTE STREAM WAS CREATED BY THE ACCIDENTAL RELEASE OF AN AQUEOUS BASED PAINT MASK WASHER. THE RELEASE WAS TO THE GROUND, PRIMARY COMPONENT OF THE WASTE IS EXCAVATED SOILS.

9. Chemical Characteristics.
pH:
Flash point:
Reactive code:
Concentration units. For EP toxic and TCLP wastes, use PPM. (% volume( ), % weight( ), PPM( ))

Major and hazardous constituents. Give range of values at right.

	Lower value	Upper value
a. TCLP INCLUDED FOR REPORT		
b.		
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

RECEIVED

DSWM NCO L3,C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
537 BRICK CHURCH PARK DRIVE
NASHVILLE, TENNESSEE 37243-1550

October 19, 1993

Mr. Dale A. Troppman
Lexalite International Corporation
P.O. Box 498
Charleuoix, MI 49720-0498

Dear Mr. Troppman:

I am writing to acknowledge the receipt of your October 5, 1993 letter and information regarding the spill clean-up at your Dickson, Tennessee facility. I am noting that manifests, Ferguson Harbour's April 5, 1993 letter describing their activities, sample analysis results and other information to verify the clean up activities were included.

I appreciate your cooperation.

Sincerely,

Tom Yates

Tom D. Yates
Division of Solid Waste Management

TDY/S1083292

RECEIVED
OCT 22 1993
Div. of
Solid & Hazardous Waste

1993 Offsite S ping Report

For wastes shipped off-site only.

Affix label or enter name, address and EPA ID number.

LEAR LITE INTL CORPORATION
1 GUMBRANCH ROAD
DICKSON, TN 37055
EPA # TND 98-777-7984

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1538

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

Waste stream or "TS"	Dot Shipping Name or Waste name	EPA Waste codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility EPA ID number	Transporter EPA ID number	TSDR Handling codes
1	RQ WASTE PAINT RELATED FLAMMABLE LIQUIDS	F003	362 ~~549~~	#2	~~SAFETY KLEEN~~ SCD07-799-5488	~~SAFETY KLEEN~~ ILD98-490-8202	T-16
6	RQ HAZARDOUS WASTE SOLID, NOS.	F005	539	4	~~SAFETY KLEEN~~ SCD07-799-5488	~~SAFETY KLEEN~~ ILD98-490-8202	T-16
7	HAZARDOUS WASTE SOLID, NOS.	F003	16,400	1	~~LAIDLAW ENVIRONMENTAL SERVICES~~ TND00-064-5770	~~FERRONE HARBOUR, INC~~ TND-00-882-5570	~~T-21~~ SO1
8	HAZARDOUS WASTE SOLID, NOS.	F003	227	1	~~LAIDLAW ENVIRONMENTAL SERVICES~~ TND00-064-5770	~~FERRONE HARBOUR, INC~~ TND00-882-5570	~~T-07~~ SO1
1	RQ WASTE PAINT RELATED FLAMMABLE LIQUIDS	F003	181	1	~~SAFETY KLEEN~~ SCD07-799-5488	~~SAFETY KLEEN~~ ILD05-106-0408	~~T-16~~ SO1
Totals: Sum the two columns to the right. Page totals: sum the following two columns. Final totals: sum all page totals on last page of report			17,709	9			

Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

2/28/94

DALE A. TROPPMAN
VICE PRESIDENT
(616) 547-1417

5-17-94 (RE-SUBMITTED)

DALE A. TROPPMAN, V.P.

CN-0779 (11/92)

DSWM 1.2

DSWM

Report Date: 02/21/95

Work Order #: 95-02-118
Survey #: 195321

Dear Customer Representative:
Attn: Dan Wharton

Attention:
Kevin Nettles

Dear Client:

The enclosed Safety-Kleen TCLP analysis of solid paint waste for Lexalite International DOES NOT show TCLP characteristic waste codes. In addition, the analysis of the sample DOES NOT show characteristic waste codes D001, D002, and D003.

For a material to be classified as non-hazardous, the generator must determine that the waste is not defined as a "listed" hazardous waste, not mixed with a "listed" hazardous waste, not derived from a "listed" hazardous waste, and obtain adequate information pertaining to the hazardous characteristics of ignitability (waste code D001), corrosivity (waste code D002), reactivity (waste code D003), and toxicity ("TCLP" waste codes D004-D043).

The corresponding preship analysis number was provided with this TCLP sample. The prequalification report will be revised to reflect the results shown in this report.

Please do not hesitate to call Rita Shah (x7352) if there are any questions.

Sincerely,

Frank A. Hartzog

Frank Hartzog
Trip Laboratory Manager

RECEIVED
MAR 6 - 1996
Solid & Hazardous Waste

Alan A. Manovitz, Technical Mgr.

Work Order #: 95-02-118
Survey #: 396321

Lexalite International

MISCELLANEOUS TESTING

TEST	DATE ANALYZED	METHOD	RESULT	UNITS
Flash Point	02/02/95	1020	>142	°F
pH	02/08/95	9045	8.5	pH
Reactivity				
Cyanide	02/03/95	D5049-90	NDO	mg/Kg
Sulfide	02/03/95	D4978-89A	NDO	mg/Kg

TCLP Metals

EPA WASTE #	ANALYTE	EPA SW846 METHOD	DATE ANALYZED	REG LIMIT (mg/L)	PQL (mg/L)	RESULT (mg/L)
D004	Arsenic	6010	01/31/95	5.00	0.400	< 0.400
D005	Barium	6010	01/31/95	100	0.100	0.171
D006	Cadmium	6010	01/31/95	1.00	0.100	< 0.100
D007	Chromium	6010	01/31/95	5.00	0.200	< 0.200
D008	Lead	6010	01/31/95	5.00	0.350	< 0.350
D009	Mercury	7470	01/30/95	0.200	0.000800	< 0.00080
D010	Selenium	6010	01/31/95	1.00	0.750	< 0.750
D011	Silver	6010	01/31/95	5.00	0.150	< 0.150

TCLP Volatile Organic Compounds by EPA Method SW846/8240

EPA WASTE #	ANALYTE	DATE ANALYZED 02/01/95	REG LIMIT (mg/L)	PQL (mg/L)	RESULT (mg/L)
D018	Benzene		0.500	0.100	<0.100
D019	Carbon Tetrachloride		0.500	0.100	<0.100
D021	Chlorobenzene		100	0.100	<0.100
D022	Chloroform		6.00	0.100	<0.100
D027	1,4 Dichlorobenzene		7.50	0.100	<0.100
D028	1,2 Dichloroethane		0.500	0.100	<0.100
D029	1,1 Dichloroethylene		0.700	0.100	<0.100
D035	Methyl Ethyl Ketone		200	0.500	0.920
D039	Tetrachloroethylene		0.700	0.100	<0.100
D040	Trichloroethylene		0.500	0.100	<0.100
D043	Vinyl Chloride		0.200	0.140	<0.140

Work Order #: 95-02-118
Survey #: 396321

Lexalite International

TCLP Base/Neutral/Acids Results by EPA Method SW846/8270

EPA WASTE #	ANALYTE	DATE ANALYZED 02/02/95	REG LIMIT (mg/L)	PQL (mg/L)	RESULT (mg/L)
D023	Cresol, o-		200	0.0290	<0.0290
D025	Cresol, p- & m-		200	0.0230	<0.0230
D030	Dinitrotoluene		0.130	0.0440	<0.0440
D032	Hexachlorobenzene		0.130	0.0440	<0.0440
D033	Hexachlorobutadiene		0.500	0.100	<0.100
D034	Hexachloroethane		3.00	0.120	<0.120
D036	Nitrobenzene		2.00	0.0680	<0.0680
D037	Pentachlorophenol		100	0.350	<0.350
D038	Pyridine		5.00	0.140	<0.140
D041	2,4,5-Trichlorophenol		400	0.0400	<0.0400
D042	2,4,6-Trichlorophenol		2.00	0.140	<0.140

RECEIVED
MAR 6 1996
Solid & Hazardous Waste

Sample Description:
Solid Paint Waste

Sample Handling Dates:

Date Sampled:	01/18/95
Date Received:	01/20/95

Sample Composition:

Number of Phases:	1
Percent Solids (Method 1311):	100%
Percent Dry Solids (Method 1311):	NA

Leaching/Extraction Dates:

Bottle Leach (Method 1311):	01/26/95
ZHE Leach (Method 1311):	01/26/95
BNA Extraction (Method 3510):	01/31/95

Report Comments

Q Results based on ASTM screening method. ND=None Detected.

PQL = Practical Quantitation Limit

Every effort is made, including extensive pretreatment of the sample, to obtain PQLs below the regulatory limit for all analytes. However, when the PQL exceeds the regulatory limit, this is due to the intrinsic nature of the material tested and the inherent limitations of the official methods in dealing with certain waste types.

Every effort is also made to analyze a representative composite portion of the sample submitted. These results, however, apply only to the portion of the sample actually analyzed.

The analyses contained herein are performed to provide Safety-Kleen and its customers a means of determining compliant waste handling practices that are consistent with applicable permits and processing capabilities.

This report may not be reproduced except in its entirety.

Analytical Review By / Date: [illegible] 2/15/95

Corporate Review By / Date: NA

RECEIVED
MAR 6 - 1996
DIV

Ex Oxide Use Only
Generator Declaration Form (Y/N): N
Corresponding Prequal (Y/N): N

DSIOM L.C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization name LEXALITE INTERNATIONAL CORPORATION			EPA identification code TND 98 771 9984
2. Mailing address PO BOX 498 10163 US 31 NORTH	City CHARLEVOIX	State MI	Zip code 49720
3 a. Site address 1 CONBRANCH RD, DICKSON, TN 37055	City	State	Zip code / County name DICKSON
b. Latitude (degrees, minutes & seconds) 36.0138	Longitude (degrees, minutes & seconds) 87.1936		
4. Owner name (new for conversion or company name) LEXALITE INTERNATIONAL CORPORATION		Type (P)	Phone with area code (616) 547-8584
5. Manager or operator name MICHAEL BURGOYNE PLT MGR		Type (P)	Phone with area code (615) 446-7733
6. Principal/owner/agent SCOTT MACHEN	FAX number with area code (615) 446-3007		Phone with area code
7. Number of employees	Year operation began	SIC code (Primary SIC first etc.)	Job shop ( ) Yes (No)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	ARNIE METTLES	24 HOURS	(615) 446-2487
b.	J SCOTT WALKER	24 HOURS	(615) 446-7733
c.	~~CHUCK PATTERSON~~ MICHAEL BURGOYNE	24 HOURS	(615) 446-7733
d.	DALE A TROPPMAN	24 HOURS	(616) 547-~~1413~~ 1477

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ) No (X)

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
03-06-1996	22		Yes No Y	Yes No Y	

12. Date closed	TSDR status	Transporter status

13. Comments

RECEIVED MAR 8 - 1996 Div. of Solid Waste

CS-0969 (Rev. 11/95) RDA 2283

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility LEXALITE INTERNATIONAL CORPORATION	EPA identification code TND 98-777-7984
2. Waste name. Use standard name from regulations whenever possible. WASTE PAINT RELATED LIQUIDS	WASTE STREAM NUMBER 1

3. Give the years that this waste has been generated, e.g. 1975, 1982. 1991	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation Continuous Accidental/ One time Various ___ (V)
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). AF	EPA waste codes. (Primary first; six maximum.) F003, F005	SIC code for generating process. 3089,

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	14.6	5.6	7.000	0.0	12,500.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
80.0	550.0	0.0	0

7. DOT shipping name	DOT hazard class		DOT ID code
RQ WASTE PAINT RELATED FLAM LIQ	ORM-D	IG	UN1263

8. Describe the generation process.

PAINT GUN AND EQUIPMENT CLEANING.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) (V)
4.4	100F		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A. ACETONE	50	60
B. MEK	10	20
C. TOLUENE	5	10
D. MIX	5	10
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

THIS STREAM IS NOW RECYCLED IN-HOUSE WITH ONLY STILL BOTTOM SHIPPED OFF-SITE FOR BLENDING.

(H09)

RECEIVED JUN 6 1996 Div. of Solid & Hazardous Waste

CN-0773 (Rev. 11/95) Form Continues on the Back UNDA 2203

DSWM LIC

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

NEW

1. Organization's full name at facility.
EXALTIS INTERNATIONAL CORPORATION

EPA Identification code: TND 99 777 7984

2. Waste name. Use standard name from regulations whenever possible.
WASTE PAINT RELATED LIQUIDS

WASTE STREAM NUMBER: [redacted] 11 pw 5/29/96

3. Give the years that this waste has been generated, e.g. 1976, 1982.
1995 —

Date no longer generated. (MM/DD/YY)

Annual Frequency of generation: Continuous / Accidental/ One time / Various ___ (V)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g). AF

EPA waste codes. (Primary first: six maximum.)
F003, F005

SIC code for generating process.
3089,

5. Physical form code: L14:Other (3)
% Solid: 14.6
% Water: 3.6
Vol. to wt. conversion (pounds/gallon): 7.000
If used for fuel, chlorine content (PPM): 0.0
BTU per pound: 12,500.0

6. Generation rates in kilograms.
Monthly maximum (kg): 80.0
Annual average (kg): 550.0
Maximum stored onsite (kg): 0.0
Maximum days stored: 0

7. DOT shipping name
NO WASTE PAINT RELATED FLAM LIQ

DOT hazard class: ORM-D
10
DOT ID code: UN1263

8. Describe the generation process.
PAINT GUN AND EQUIPMENT CLEANING. STILL BOTTOMS

9. Chemical Characteristics.
pH: 7.4
Flash point: 100F
Reactive code:
Concentration units. Use PPM for TCLP and EP Toxic wastes % volume(v), % weight(w), PPM) (V)

A. Major and hazardous constituents. Give range of values at right.

	Lower value	Upper value
ACETONE	50	60
B. HEX	10	20
C. TOLUENE	5	10
D. MIX	5	10
E.		

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 5 of the instructions.
~~THIS STREAM IS NOW COMPLETELY~~
STILL BOTTOM SHIPPED OFF-SITE FOR BLENDING.

Paul Fahl

RECEIVED
MAY 29 1996
DIVISION OF SOLID WASTE

GN-0773 (Rev. 11/95)

Print Continued on the Back

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: LEXALITE INTERNATIONAL CORPORATION
   EPA Identification code: TND 98-777-7984

2. Waste name. Use standard name from regulations whenever possible: PAINT SOLIDS
   WASTE STREAM NUMBER: 6

3. Give the years that this waste has been generated, e.g. 1975, 1982: 1993
   Date no longer generated (MM/DD/YY): 8/11/95
   Annual Frequency of generation: Continuous ___ Accidental/ One time ___ Various (C)

4. Circle all appropriate hazard criteria below: Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).
   EPA waste codes: (Primary first, six maximum): F005
   SIC code for generating process: 3089,

5. Physical form code: Sld;Oth (9)
   % Solid: 75.8
   % Water: 14.5
   Vol. to wt. conversion (pounds/gallon): 5.400
   If used for fuel, chlorine content (PPM): 0.0
   BTU per pound: 6,400.0

6. Generation rates in kilograms.
   Monthly maximum (kg): 45.0
   Annual average (kg): 539.0
   Maximum stored onsite (kg): 135.0
   Maximum days stored: 0

7. DOT shipping name: RQ HAZARDOUS WASTE SOLID NOS
   DOT hazard class: ORM-D
   DOT ID code: NA3077

8. Describe the generation process.
   PAINT SOLIDS RECLAIMED FROM AQUEOS BASE WASH WASHER

9. Chemical Characteristics.
   pH: 8.2
   Flash point:
   Reactive code:
   Concentration units. Use PPM for TCLP and EP Toxic wastes (% volume(), % weight(), PPM()) (W)

10. Major and hazardous constituents. Give range of values at right.

	Lower value	Upper value
A. WATER CONTENT		14.5%
B. NON-VOLATILE RESIDUE		75.8%
C. VOLATILE ORGANICS		9.7
D.		
E.		

11. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.
   THIS WASTE WAS MANAGED BY BLENDING

(750)

EN 0773 (REV. 1/85) 2/2 Form continues on the back

RECEIVED
SEP 1 1995

DSWM L.L.C

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility. LEXMARK INTERNATIONAL CORPORATION	EPA identification code TND 98-777-7984
2. Waste name. Use standard name from regulations whenever possible. WASTE COMBUSTIBLE LIQUID NOS.	WASTE STREAM NUMBER 9

3. Give the years that this waste has been generated, e.g. 1975, 1982.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1994		Continuous / Accidental/ One time / Various ___ (V)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
A6	D001, D006, D008, D035, D039, D040	~~1084~~ 3089

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Liq-Oth (3)	.5%	1.0	6.700	0.0	0.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
120	60.0	0.0	0

7. DOT shipping name	DOT hazard class	DOT ID code
WASTE COMBUSTIBLE LIQ NOS MINERAL	Flam/Comb Liquids 03	NA1993

8. Describe the generation process.

PARTS WASHER FLUID, RECLAIME.

9. Chemical Characteristics. pH:	Flash point 105F	Reactive code	Concentration units. Use PPM for TCLP and EP toxic wastes % volume(v), % weight(), PPM( ). (V)

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A. CADMIUM	.06	2.56
B. LEAD	1.03	55.9
C. BENZENE	.15	6.47
D. MEK	32	13000
E. TETRACHLORIDE	5	12000

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

THIS WASTE STREAM HAS BEEN ELIMINATED.
THE ONE ANNUAL SHIPMENT MADE IN 1995 WAS RECYCLED BY SAFETY-KLEEN

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full legal name: LEXALITE INTERNATIONAL CORPORATION			Installation identification number: TND 98-777-7984	
2. Mailing address: PO BOX 498 10163 US 31 NORTH	City: CHARLEVOIX	State: MI	Zip code: 49720	
3 a. Site address: 1 GUMBRANCH RD, DICKSON, TN 37055	City	State	Zip code	County name: Dickson
b. Latitude (degrees, minutes & seconds): 36.0136	Longitude (degrees, minutes & seconds): 87.1936			
4. Owner name (may be corporation or company name): LEXALITE INTERNATIONAL CORPORATION		Type	Phone with area code: (616) 547-6584	
5. Manager or operator name: MICHAEL BURGOYNE PLT MGR		Type	Phone with area code: (615) 446-7733	
6. Principal technical contact: J SCOTT WALKER	FAX number with area code: (615) 446-3007		Phone with area code: (615) 441-6274	
7. Number of employees: 80	Year operation began: 1985	SIC codes (Primary SIC first,etc.): 3089, , ,		Job shop: Yes No (Y)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	ARNIE METTLES	24 HOURS	(615) 446-2487
b.	J SCOTT WALKER	24 HOURS	(615) 446-7733
c.	MICHAEL BURGOYNE	24 HOURS	(615) 446-7733
d.	~~[illegible]~~	~~[illegible]~~	~~[illegible]~~
	Tony B. Lee	M-F 8A-5P EST	(616) 547-1408

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ). No (x).

10. Certify that the information given in this document is true, accurate and complete by signing and dating:

Signature of authorized representative	Title	Date
[signature]	DIRECTOR OF MATERIALS MGMT	27 FEB 98

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
03/03/1998	22		Yes No	Yes No	

12. Date closed	TSDR status	Transporter status

13. Comments SEE ATTACHED ANN. HAZ. WASTE REPORT PENALTY POLICY.

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MAR 03 1998
Div. of Solid & Hazardous Waste

CN-0909(Rev.11/95) RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility LEXALITE INTERNATIONAL CORPORATION	**Installation identification number** TND 98-777-7984
2. **Waste name**. Use standard name from regulations whenever possible. WASTE PAINT RELATED LIQUIDS	WASTE STREAM NUMBER 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1991		Continuous Accidental/ Varied/ One time

4. Circle all appropriate hazard criteria below. Ignitable (a). EP toxic (b). Corrosive (c). Reactive (e). Other toxic (f). TCLP (g) F	EPA waste codes (Primary first; six maximum.) D001, F003, F005	SIC code for generating process 3089,

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	14.6	3.6	7.000	0.0	12,500.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
80.0	550.0	0.0	0

7. DOT shipping name	DOT hazard class		DOT ID code
RQ WASTE PAINT RELATED FLAM LIQ	ORM-D	10	UN1263

8. Describe the generation process.
PAINT GUN AND EQUIPMENT CLEANING.

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ). % weight( ). PPM( ) (V)
4.4	100F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. ACETONE	50	60
B. MEK	10	20
C. Isopropyl Alcohol	5	10
D. MIBK	5	10
E.		

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

T50 - This entire waste stream is fuel blended.

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MAR 03 1998

Div. of Solid & Hazardous Waste

4(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility LEXALITE INTERNATIONAL CORPORATION	**Installation identification number** TND 98-777-7984
2. **Waste name.** Use standard name from regulations whenever possible. WASTE PAINT RELATED LIQUIDS	WASTE STREAM NUMBER 11

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1995-	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation Continuous Accidental/ Various One time
4. Circle all appropriate **hazard criteria** below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g)F	**EPA waste codes.** (Primary first: six maximum.) F003, F005	**SIC code** for generating process 3089,

5. **Physical form code**	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	14.6	3.6	7.000	0.0	12,500.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
80.0	550.0	0.0	0

7. **DOT shipping name**	DOT hazard class		DOT ID code
RQ WASTE PAINT RELATED FLAM LIQ	ORM-D	10	UN1263

8. Describe the **generation process**.

PAINT GUN AND EQUIPMENT CLEANING. STILL BOTTOMS.

9. **Chemical Characteristics.**

pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )(V)
4.4	100F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. ACETONE	50	60
B. MEK	10	20
C. TOLUENE	5	10
D. MIK	5	10
E.		

10. Describe how you have managed or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

This on-site recovery unit was not utilized at all during 1997, but remains available. This waste stream is inactive and will be used on an as-needed basis for the forseeable future.

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Div. of
Solid & Hazardous Waste

3(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management
Fifth Floor. L & C Tower. 401 Church Street. Nashville. TN 37243-1535

1. **Organization's full name** at facility LexaLite International Corporation	**Installation identification number** TND98-777-7984
2. **Waste name.** Use standard name from regulations whenever possible. Hazardous Waste Solid, N.O.S. (mercury)	WASTE STREAM NUMBER 13

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1997	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation Continuous Accidental/ One time Various
4. Circle all appropriate **hazard criteria** below. Ignitable (a). EP toxic (b). Corrosive (c). Reactive (e). Other toxic (f). TCLP (g). bg	**EPA waste codes.** (Primary first six maximum.) D009	**SIC code** for generating process. 3089

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel. chlorine content(PPM)	BTU per pound
9	100				

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
3	35	20	180

7. **DOT shipping** name	DOT hazard class	DOT ID code
Hazardous waste solid, N.O.S. (mercury)	9	NA3077

8. Describe the **generation process.**

Spent mercury-containing lamps from plant operations

9. **Chemical Characteristics.** pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ). % weight( ). PPM( )

Hazardous constituents. Give range of values at right.	lower value	upper value
A. Mercury	variable	
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

All lamps are fully recycled including mercury, glass and metal endcaps. T66

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Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

1. **Organization's full name** at facility LexaLite International Corporation	**Installation identification number** TND98-777-7984
2. **Waste name.** Use standard name from regulations whenever possible. Waste mercury	WASTE STREAM NUMBER 14

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1997		Continuous Accidental/ One time Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
hg	D009	3089

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
9	100				

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
n/a	n/a	n/a	n/a

7. DOT shipping name	DOT hazard class	DOT ID code
Waste mercury	8	UN2809

8. Describe the generation process.

All items in this waste stream are machine controller, switches, thermometers and the like that failed at the end of life.

9. Chemical Characteristics

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )

Hazardous constituents. Give range of values at right.	lower value	upper value
A. Mercury	50	100
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

These items are fully recycled by mercury reclamation. T66

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MAR 13 1998

Div. of Solid & Hazardous Waste

1997 Offsite Shipping Report

For wastes shipped offsite only.

TND 98-777-7984 YYN- - Nashville FO

LEXALITE INTERNATIONAL CORPORATION
Attn: J SCOTT WALKER
PO BOX 498 10163 US 31 NORTH
CHARLEVOIX, MI 49720

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2. Waste Streams or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility Installation ID	Transporter Installation ID	TSDR Handling Codes
a. 1	Waste Paint Rel.Liqids	D001 F003,F005	56.36	1	TND000645770	MDD980554653	~~T50~~ S01
b. 1	Waste Pnt.Rel. Liquids	D001 F003 F005	192.73	1	TND000645770	SCD987574647	~~T50~~ S01
c. 13	Hazardous Waste Sol. N.O.S. (mercury)	D009	2.27	1	TND000645770	MDD980554653	T66
d. 13	(same)	D009	16.37	2	TND000645770	SCD987574647	T66
e. 14	Waste Mercury	D009	24.5	2	TND000645770	SCD987574647	T66
f.							
g.							
h.							

3. Totals Sum the two columns to the right.
Page totals: sum the following two columns — 292.23 — 7
Final totals: sum all page totals on last page of report

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

DIRECTOR OF MATERIALS MGMT 27 FEB 98

RECEIVED MAR 13 1998 Div. of Solid & Hazardous Waste

CN-0779 (Rev. 11/94)

RDA 2203

DSWM L&C

HAZARDOUS WASTE INSPECTION REPORT

SITE/PHYSICAL LOCATION:

Lexalite International Corporation
TND 98-777-7984
1 Gumbranch Road
Dickson, TN 37055
Dickson County

PRIMARY CONTACT:

Scott Walker
Lexalite International Corporation
1 Gumbranch Road
Dickson, TN 37055
Phone: (615) 547-6584
Fax: (615) 446-3007

DATE/TIME OF INSPECTION:

January 28, 1999
approximately 8:00 a.m.

INSPECTION PARTICIPANTS:

Scott Walker, Environmental Engineer
Lexalite International Corporation
Tom Yates, Tennessee Department of Environment and Conservation, Division of Solid Waste Management, Nashville/Joelton Environmental Assistance Center

REPORT PREPARED BY:

Tom Yates, Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Nashville/Joelton Environmental Assistance Center
3000 Morgan Road
Joelton, TN 37080
Phone: (615) 299-9922
Fax: (615) 299-8749

PURPOSE OF INSPECTION:

This inspection was conducted to evaluate Lexalite International Corporation's compliance with the applicable requirements of the Rules and Regulations promulgated pursuant to the Hazardous Waste Management Act, T.C.A. 68-212-101 et. seq. and Hazardous Waste Reduction Act, T.C.A. 68-212-301 et. seq.

FACILITY DESCRIPTION:

Lexalite International Corporation's main product at their Dickson facility is lens used for industrial lighting fixtures. They also make some plastic injection molded products such as hood type covers used on lawn tractors. They employ approximately 80 workers and the size is approximately 30,000 sq. ft. In the past years , they have been classified as a small quantity hazardous waste generator and continue to appear under this classification in some records. However, they have now reduced their hazardous waste generation quantity enough to qualify them as a conditional exempt small quantity hazardous waste generator. They use the Standard Industrial Classification code 3089.

INSPECTION FINDINGS:

This inspection consisted of a records review and a facility inspection. The records reviewed included annual reports and manifest. The facility inspection included the waste generation process, satellite accumulation and the prior to shipment accumulation area.

Lexalite currently has only one active hazardous waste stream and based on annual report data and other records generates less than 100 kg per month and never allows 1000 kg or more to accumulate on site. This waste is paint related waste generated from cleaning equipment used in the 2 paint booths. This waste is collected in 5 gallon pails which are eventually emptied into a 55 gallon drum located in the hazardous waste accumulation area in the chemical room. It remains here until it is shipped to a permitted hazardous waste facility.

Mr. Walker explained that Lexalite International Corporation wanted to continue to be treated as a small quantity hazardous waste generator on a voluntary basis with regard to regulatory standards even though they qualify as a conditional exempt small quantity hazardous waste generator. This inspection was conducted in that context.

VIOLATIONS:

No violations were identified during this compliance evaluation.

REMARKS:

Please be reminded that all containers of hazardous waste must be kept closed (if not in use) securely enough that if it were tipped over, the contents would not spill. Also, be reminded that containers used for satellite collection of hazardous must be marked with the works "Hazardous Waste".

I appreciate the time and cooperation I was given during the inspection. If there are any questions regarding this report, contact Tom Yates at (615) 299-9922.

SIGNED: Tom Yates DATE: 2-8-99

REVIEWED: [illegible] DATE: Feb 8, 1999

cc: DSWM-Central Office
U.S.E.P.A., Region IV

ENVIRONMENTAL ASSISTANCE CENTER
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
3000 MORGAN ROAD
JOELTON, TENNESSEE 37080
PHONE (615) 299-8451 STATEWIDE 1-888-891-8332 FAX (615) 299-8749

RECEIVED
DIV SOLID WASTE MGT
FEB 11 1999
Group No._____ File No._____
ID No._____

February 8, 1999

Mr. J. Scott Walker
Lexalite International Corporation
P.O. Box 395
Dickson, TN 37055

TND 98-777-7984

RE: HAZARDOUS WASTE INSPECTION
Tennessee Hazardous Waste Management Act

Dear Mr. Walker:

This letter confirms the observations and recommendations which were made during the Small Quantity Generator facility inspection on January 28, 1999. The attached inspection report verifies that no violations were discovered during the inspection.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 299-9922.

Sincerely,

Tom Yates

Tom Yates
Division of Solid Waste Management

TDY/lexal182/bbm

cc: DSWM-Central Office
U.S.E.P.A.-Region IV

TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT
COMPLIANCE MONITORING AND ENFORCEMENT ACTIVITY REPORT Dickson Co. PH 2430
Rev. 9/85

1. ID NO: TND 040645368 Name: Martin Cabinet Shop

ADDRESS: Rt #1 White Bluff TENN 37187

2. PROGRAM: Hazardous Waste (X) Solid Waste [ ]

3. KEY DATE: (MM-DD-YY) 07-16-86

TYPE OF EVALUATION

4. EVALUATION INSPECTION
07,16,86
(field visits)

A. FULL CHECKLIST
1. HW GEN [1] 3. HW TSDF [3] 6. SW PROCESSING FACILITY [6]
2. HW TRANS [2] 4. HW SQ GEN [4] 7. SW LANDFILL [7]
5. HW NON-NOT (X) 8. PART B INSPECTION [8]

B. OTHER
1. WALK-THROUGH INSP [1] 5. PART A MODIFICATION/WITHDRAWAL EVAL [5]
2. CLOSURE EVAL [2] 6. COMPLAINT FOLLOW-UP NOS [6]
3. POST CLOSURE EVAL [3] 7. EMERGENCY RESPONSE [7]
4. SPECIAL WASTE EVAL [4] 8. OTHER (describe in comments) [8]

5. SAMPLING INSPECTION ___/___/___
1. GENERATED WASTE [1] 3. SOIL/SEDIMENT [3] 5. GROUND WATER [5]
2. RECEIVED WASTE [2] 4. SURFACE WATER/LEACHATE [4] 6. AMBIENT AIR [6]
SAMPLES

6. SPECIAL INSPECTION ___/___/___
1. GROUNDWATER MONITORING [1] 3. PRELIMINARY GEOLOGIC EVALUATION [3]
2. OTHER (describe in comments) [2] 4. FINAL GEOLOGIC EVALUATION [4]

7. RECORDS/REPORT REVIEW ___/___/___
(non-permitting)
(in office)
1. CLOSURE PLANS WITH COST ESTIMATES [1] 7. MANIFEST REPORTS [7]
2. POST CLOSURE PLANS WITH COST ESTIMATE [2] 8. MANIFEST RECORDS [8]
3. FINANCIAL INSTRUMENTS [3] 9. GWM DATA [9]
4. OTHER REQUIRED PLANS [4] 10. GWM PLANS [10]
5. SPECIAL WASTE REQUEST [5] 11. OTHER [11]
6. LANDFILL PLANNING ANNUAL REPORT [6]

8. FOLLOW-UP EVALUATION ___/___/___
1. WITH FIELD OFFICE PERSONNEL ONLY [1] 3. FIELD VISIT [3]
2. WITH CENTRAL OFFICE PERSONNEL [2] 4. RECORD REVIEW [4]

9. INCIDENT PROCESSING ___/___/___
1. ORAL COMPLAINT [1] 3. EMERGENCY RESPONSE CALL [3]
2. WRITTEN COMPLAINT [2] 4. OTHER (describe in comments) [4]

10. MISCELLANEOUS ___/___/___
1. FACILITY STATUS EVALUATION MEETINGS/LETTERS [1] 3. ABORTED INSPECTION [3]
2. OTHER (describe in comments) [2] 4. WARNING LETTER [4]

11. VIOLATION CODES: NONE (X)

12. ENFORCEMENT ACTION:

	DATE ACTION TAKEN	SCHEDULED COMPLIANCE DATE	ACTUAL COMPLIANCE DATE
NOTICE OF VIOLATION	___/___/___	___/___/___	___/___/___
COMPLIANCE REVIEW MEETING	___/___/___	___/___/___	___/___/___
REFERRED TO ENFORCEMENT SECTION	___/___/___		

13. COMMENTS: (continue on reverse if necessary) On Hwy 47 about 1 mile South of White Bluff. One man cabinet shop operated out of garage. Does not generate hazardous waste.

KEY OVER [ ]

14. PREPARED BY: D. WALL ID CODE: 084 DATE: 07-18-86 FIELD OFFICE: Nashville 102

DSWM L.C

TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT
COMPLIANCE MONITORING AND ENFORCEMENT ACTIVITY REPORT Dickson G

PH 2430
Rev. 9/85

1. ID NO: TND 063737605 Name: Mid-Tenn Aviation Inc

ADDRESS: Rt 3 Sylvia Road Dickson TN 37055

2. PROGRAM: Hazardous Waste (X) Solid Waste ( )

3. KEY DATE: (MM-DD-YY) 07-16-86

TYPE OF EVALUATION

4. EVALUATION INSPECTION
07, 16, 86
(field visits)

A. FULL CHECKLIST
1. HW GEN [1]
2. HW TRANS [2]
3. HW TSDF [3]
4. HW SQ GEN [4]
5. HW NON-NOT (NOT)
6. SW PROCESSING FACILITY [6]
7. SW LANDFILL [7]
8. PART B INSPECTION [8]

B. OTHER
1. WALK-THROUGH INSP [1]
2. CLOSURE EVAL [2]
3. POST CLOSURE EVAL [3]
4. SPECIAL WASTE EVAL [4]
5. PART A MODIFICATION/WITHDRAWAL EVAL [5]
6. COMPLAINT FOLLOW-UP NOS [6]
7. EMERGENCY RESPONSE [7]
8. OTHER (describe in comments) [8]

5. SAMPLING INSPECTION
__/__/__
1. GENERATED WASTE [1]
2. RECEIVED WASTE [2]
3. SOIL/SEDIMENT [3]
4. SURFACE WATER/LEACHATE [4]
5. GROUND WATER [5]
6. AMBIENT AIR [6]
0 SAMPLES

6. SPECIAL INSPECTION
__/__/__
1. GROUNDWATER MONITORING [1]
2. OTHER (describe in comments) [2]
3. PRELIMINARY GEOLOGIC EVALUATION [3]
4. FINAL GEOLOGIC EVALUATION [4]

7. RECORDS/REPORT REVIEW
__/__/__
(non-permitting)
(in office)
1. CLOSURE PLANS WITH COST ESTIMATES [1]
2. POST CLOSURE PLANS WITH COST ESTIMATE [2]
3. FINANCIAL INSTRUMENTS [3]
4. OTHER REQUIRED PLANS [4]
5. SPECIAL WASTE REQUEST [5]
6. LANDFILL PLANNING ANNUAL REPORT [6]
7. MANIFEST REPORTS [7]
8. MANIFEST RECORDS [8]
9. GWM DATA [9]
10. GWM PLANS [10]
11. OTHER [11]

8. FOLLOW-UP EVALUATION
__/__/__
1. WITH FIELD OFFICE PERSONNEL ONLY [1]
2. WITH CENTRAL OFFICE PERSONNEL [2]
3. FIELD VISIT [3]
4. RECORD REVIEW [4]

9. INCIDENT PROCESSING
__/__/__
1. ORAL COMPLAINT [1]
2. WRITTEN COMPLAINT [2]
3. EMERGENCY RESPONSE CALL [3]
4. OTHER (describe in comments) [4]

10. MISCELLANEOUS
__/__/__
1. FACILITY STATUS EVALUATION MEETINGS/LETTERS [1]
2. OTHER (describe in comments) [2]
3. ABORTED INSPECTION [3]
4. WARNING LETTER [4]

11. VIOLATION CODES: NONE (X)

12. ENFORCEMENT ACTIONS:

	DATE ACTION TAKEN	SCHEDULED COMPLIANCE DATE	ACTUAL COMPLIANCE DATE
NOTICE OF VIOLATION	__/__/__	__/__/__	__/__/__
COMPLIANCE REVIEW MEETING	__/__/__	__/__/__	__/__/__
REFERRED TO ENFORCEMENT SECTION	__/__/__		

13. COMMENTS: (continue on reverse if necessary) Mid Tenn Aviation is out of business. They were operating airport. Now being run by Arch-Air Aviation. No hazardous waste generated at this site.

KEY OVER ( )

14. PREPARED BY: D. WALL | ID CODE: 084 | DATE: 07-18-86 | FIELD OFFICE: Nashville 102

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, Tennessee 37247-3530

1. Organization's full, legal name: Murphy Oil USA, Inc.			EPA identification code: TND 987778354
2. Mailing address: 3767 Nolensville Road	City: Nashville	State: TN.	Zip code: 37211
3 a. Site address: Sta. #3646 508 Hensley Drive	City: Dickson	State: TN	Zip code: 37055 / County name: Dickson
b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)		
4. Owner name: Murphy Oil USA, Inc.			Phone with area code: ( ) 615 833-4820
5. Manager or operator name: Guy Steven Dunn			Phone with area code: 615) 446-9970
6. Principal technical contact: Glenn Wright			Phone with area code: ( ) 615 833-4820
7. Number of employees	Year operation began: ~~APPROX.~~ 1961	SIC codes (Primary SIC first, etc.): 5541	Job shop: Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
a. Glenn Wright	24 Hours	~~(615) 833-4820~~ (615) 791-4058
b. Jim Schneider	Week Days 8am-5pm	(501) 864-6413
c. Bob Billingsley	" 8am-5pm	(501) 864-6252
d. David Petty	" 8am-5pm	(501) 864-6491

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.

N/A

10. Check the activities below you are engaged in related to burning hazardous waste as a fuel.
a. Fuel blending or marketing of hazardous waste as a fuel. . . . . a. N/A
b. Transporting hazardous waste as fuel (N/A)
c. Burning hazardous waste as fuel N/A

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
	Area Manager	6-3-91

*** Below is for Department use only ***

12. Date received	County code	Priority	Generator	Small Generator	Special status
060491	22		(Yes) No	(Yes) No	

13. Date closed	Date regulated	Date deregulated	Inspection frequency
			Annual (A), FY90-2n (1), FY91-2n (2)

14. Comments

JUN 7 1991

Hazardous Waste Stream Report

MAY 20 1991

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility. Murphy Oil USA, Inc. Marketing Department	EPA identification code TND987778354
2. Waste name. Use standard name from regulations whenever possible. Gasoline Contaminated waste water	Waste Stream number 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Frequency of generation
N/A	N/A	Continuous / Accidental/ One time / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f). Possible/Not probable	EPA waste codes. (Primary first)	SIC code for generating process.
	D001	5541

5. Physical form	Percent solid	Percent water	Vol. to wt. conversion (pounds per gallon)	If used for fuel. chlorine content	BTU per pound
Liquid 3	%	99plus %	8.34/gal.	None PPM	None /lb.

6. Generation rates. Supply all rates in kilograms. Monthly maximum	Annual average	Maximum amount stored on-site	Maximum days stored
Varies 7100 (kg)	Varies 7100 (kg)	Presently 5670 (kg)	Temporary

7. DOT shipping name	DOT hazard class	DOT ID code
None	FLAMMABLE LIQ 07	UN 1203

8. Describe generation process.
Leaking UST's may contaminate ground water and generate waste which may require offsite treatment/disposal. May have sheen; may contain low levels of BTEX.

*** ANNUAL REPORT SECTION *** Complete at end of each calendar year. Continue waste stream description report with line 12 on the back.

9. Report annual generation and handling data. If the waste was shipped off-site, summarize in block (a) and submit an Offsite Shipping Report. Report onsite handling in blocks (b) - (d). For offsite or onsite handling that require interim status or a permit, use "I", "S", or "D" codes from the instructions. For other onsite handling, use "H" codes.

Report Year	Amount generated during year (kg)	Amount on-site on first day of year (kg)	Amount on-site on last day of year (kg)

	Total Handled OFFsite		TSDR handling/Waste management methods		Amount Handled ONsite		TSDR handling/Waste management methods
a		N		b		Y	

	Amount Handled ONsite		TSDR handling/Waste management methods		Amount Handled ONsite		TSDR handling/Waste management methods
c		Y		d		Y	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

a. Reformulation/redesign of product . a( )
b. In process recycling. . . . . b( )
c. Equipment/technology modification . c( )
d. Substituting raw materials . . . . d( )
e. Improved operations. . . . . e( )
f. No effort. . . . . f( )
g. Other - explain below: . . . . g( )

12. Describe changes in volume and toxicity that these reduction efforts described in line 10 produced. Use back if needed. (On the previous [illegible])

JUN - 6 1991

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535
If below is incorrect, please change, certify and return. Retain a copy of any changes.

DSWM
L.C

1. Organization's full, legal name: MURPHY OIL USA, INC
EPA identification code: TND 98-777-8354

2. Mailing address: 3767 NOLENSVILLE ROAD
City: NASHVILLE
State: TN
Zip code: 37211

3 a. Site address: 508 HENSLEY DRIVE STA #3646, DICKSON, TN
City: 37211
State:
Zip code:
County name: Dickson

b. Latitude (degrees, minutes & seconds): 00.0000
Longitude (degrees, minutes & seconds): 00.0000

4. Owner name: MURPHY OIL USA, INC
Phone with area code: (615) 833-4820

5. Manager or operator name: GUY STEVEN DUNN
Phone with area code: (615) 446-9970

6. Principal technical contact: GLENN WRIGHT
Phone with area code: (615) 833-4820

7. Number of employees: 0
Year operation began: 1961
SIC codes (Primary SIC first, etc.): 5541, , ,
Job shop: Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
a. GLENN WRIGHT	24 HOURS	(501) 863-6401
b. JIM SCHNEIDER	MX DAYS 8AM-5PM	(501) 864-6413
c. BOB BILLINGSLEY	8AM-5PM	(501) 864-6232
d. DAVID PETTY	8AM-5PM	(501) 864-6491

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.
N/A

10. Check the activities below you are engaged in related to burning hazardous waste as a fuel.
a. Fuel blending or marketing of hazardous waste as a fuel . . . . . a( )
b. Transporting hazardous waste as fuel . b( )
c. Burning hazardous waste as fuel . . . c( )

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Duke Chennault	AGENT FOR MURPHY OIL	02-25-93
DUKE CHENNAULT		

*** Below is for Department use only ***

12. Date received	County code	Priority	Generator	Small Generator	Special status
3/3/93	22		Yes (No)	Yes (No)	

13. Date closed	Date regulated	Date deregulated
10-4-91		

14. Comments: postmarked 2/20/93 TALKED TO MR CHENNAULT AND HE GAVE ME CLOSING DATE.

CN-0909 (11/92)

MAR 3 1993

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535
Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility.
   MURPHY OIL USA, INC
   EPA identification code
   TND 98-777-8354

2. Waste name. Use standard name from regulations whenever possible.
   GASOLINE CONTAMINATED WASTE WATER
   Waste Stream number
   1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.
   Date no longer generated. (MM/DD/YY)
   10-4-91
   Frequency of generation (V)
   Continuous | Accidental/ One time | Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).
   A
   EPA waste codes. (Primary first; six maximum.)
   D001,
   SIC code for generating process.
   5541,

5. Physical form: Liq-Othr (3)
   % Solid:
   % Water: 99
   Vol. to wt. conversion (pounds/gallon): 8.340
   If used for fuel, chlorine content (PPM): 0.0
   BTU per pound: 0.0

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): 0.0
   Annual average (kg): 0.0
   Maximum amount stored on-site (kg): 567.0
   Maximum days stored: 0

7. DOT shipping name: NONE
   DOT hazard class: Flam. liquid 07
   DOT ID code: UN1203

8. Describe generation process.
   LEAKING UST'S MAY CONTAMINATE GROUND WATER AND GENERATE WASTE WHICH MAY REQUIRE OFFSITE TREATMENT/DISPOSAL. MAY HAVE SHEEN; MAY CONTAIN LOW LEVELS OF BTEX.

9. Chemical Characteristics.
   pH: 7.0
   Flash point: <140
   Reactive code:
   Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ) % weight( ), PPM( ) (V)

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. MAY HAVE FREE FLOATING PRODUCT.	10	60
b. MAY CAUSE WASTE TO IGNITE AT <140F	<0.5	
c. MAY CONTAIN TRACE LEVELS OF BTEX	<0.00	<0.01
d. MAY CONTAIN BENZENE >0.5PPM	<0.00	<0.01
e. DOES NOT CONTAIN METALS, CYANIDES, SULFIDES, PCB'S, HALOGENS		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.
    IT IS PROGRAMED TO BE PROCESSED IN THE RECOVERY AND FUEL BLENDING PROGRAM.

File (sep copy) 7-22-93
ACB

JUL 21 1993

NCO

DSWM
L&C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
537 BRICK CHURCH PARK DRIVE
NASHVILLE, TENNESSEE 37243-1550

CERTIFIED MAIL P 197 718 959
RETURN RECEIPT REQUESTED

July 19, 1993

Mr. Tony R. Spear
Ceco Entry Systems
One Ceco Place
P.O. Box 308
Dickson, TN 37056

Re: NOTICE OF VIOLATION
Tennessee Hazardous Waste Management Act

Dear Mr. Spear:

This letter confirms the observations and recommendations which were made during the Hazardous Waste generator inspection concerning your facility on July 14, 1993. The attached inspection report details the violations which were noted during the inspection.

These violations should be corrected no later than August 15, 1993. A follow-up inspection will be scheduled to verify that the appropriate corrective action has been taken.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 741-0654.

Sincerely,

Tom Yates

Tom Yates
Division of Solid Waste Management

TDY/S1063200/SW-184

cc: DSWM - Central Office, Nashville
U.S.E.P.A., Region IV

INSPECTION REPORT

SITE/OPERATION INSPECTED:

Ceco Entry Systems, A United Dominion Co.
One Ceco Place
P.O. Box 308
Dickson, TN 37056
TND-98-778-1481

OWNER/OPERATOR/PRIMARY CONTACT:

Tony R. Spear
EPA Coordinator/Project Engineer

DATE AND TIME OF INSPECTION:

July 14, 1993
Approximately 9:15 a.m.

REPORT PREPARED BY:

Tom Yates
Division of Solid Waste Management
537 Brick Church Park Drive
Department of Environment and Conservation
Nashville, Tennessee 37243-1550
(615) 741-0654

NAMES AND AFFILIATIONS OF OTHER INSPECTION PARTICIPANTS:

None

PURPOSE OF INSPECTION:

This routine hazardous waste generator inspection was conducted to evaluate Ceco Entry System's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

EVALUATION BASIS:

Large Quantity Hazardous Waste Generator

FACILITY DESCRIPTION:

Ceco Entry Systems manufactures steel and fiberglass residential doors.

They also make some frame products. Their actual production began in 1992. They have about one hundred thirty five (135) employees. The production processes include framing the door panels, assembling the doors, injecting insulation in the doors, painting and packaging the doors for shipment. In their initial notification, several waste streams were reported that were associated with start up and construction activities. These are not expected to be generated on a continuous basis. Three waste streams are currently generated on a continuous basis. Two of these are related to the painting operations and the other is generated from cleaning door panels.

A review of manifests indicated Chem Waste and Safety Kleen have been used for transporting and treating or disposal of Ceco's hazardous waste. I understand the current arrangements are for Safety Kleen to transport, and treat or dispose of all Ceco's hazardous waste. They plan to make pick ups about every six (6) weeks. There is one satellite accumulation area at this facility where hazardous waste is accumulated in drums, until they are full and moved to the main accumulation area. No tanks are used for hazardous waste accumulation. Mr. Speer explained that material generated from the injection insulation process which Ceco cannot use at this facility is shipped to their California facility and used there and therefore not considered waste.

INSPECTION FINDINGS:

(a) The following violations were noted:

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-. 07 provided that the generator records inspections in an inspection log or summary. The generator must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observation made, and the date and nature of any repairs or other remedial actions. (0087)

The weekly inspection log of the hazardous waste accumulation area did not show the condition of the container or indicate who the inspector was.

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management. (0127)

There was no docment which described the duties and responsibilities, with regard to hazardous waste, for all jobs that involve hazardous waste activities.

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste

on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste. (0135)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-. 07 provided that the generator retains records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0145)

There was no record that verified the type, content, and who received hazardous waste training.

Rule 1200-1-11-. 03(4)(e)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-. 07 provided that the generator ensures that while hazardous waste is being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste". (0525)

Satellite hazardous waste containers were not marked as hazardous waste.

RECOMMENDATIONS AND REMARKS:

Amend the weekly hazardous waste inspection log to include space to indicate the condition of the hazardous waste containers, to describe action when it is needed and to show who did the inspection.

Develop and have available for review a document that gives the job title and description of all jobs that involve hazardous waste activity. Be sure the job description includes hazardous waste activities and responsibilities.

Develop, maintain, and have available for review information and material that describes and outlines the training with regard to hazardous waste. Also, have available for review, documentation to verify who received training and when it was conducted.

Mark all containers that contain hazardous waste, including satellite containers, with the words "Hazardous Waste".

The contingency plan could be improved if the notification section was specific with regard to the Commissioner of Environment and Conservaton and TEMA when appropriate. The addresses given for the emergency coordinator in the plan should include the street name and house number or route number. The addition of a drawing of the plant layout showing evacuation routes and emergency equipment locations would be helpful in understanding the narrative of these items.

I appreciate the time and cooperation I was given during my inspection. If there are any questions regarding this report, contact me at (615) 741-0854.

Signed: Jon Yates

Date: July 19, 1993

TDY/S1073200/SW-188

Hazardous Waste Notification

DSWM L&C

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name: CECO ENTRY SYSTEMS A UNITED DOMINION COMPANY
EPA identification code: TND 98-779-1481

2. Mailing address: ONE CECO PLACE | City: DICKSON | State: TN | Zip code: 37055

3 a. Site address: ONE CECO PLACE, DICKSON, TN 37055 | City: | State: | Zip code: | County name: Dickson

b. Latitude (degrees, minutes & seconds): 36.0248 | Longitude (degrees, minutes & seconds): 87.2018

4. Owner name: UNITED DOMINION INDUSTRIES | Phone with area code: (704) 347-6800

5. Manager or operator name: JIM MELDON | Phone with area code: (615) 446-6220

6. Principal technical contact: TONY SPEER | Phone with area code: (615) 446-6220

7. Number of employees: 135 | Year operation begin: 1991 | SIC codes (Primary SIC first, etc.): 3442, , , | Job shop: Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	TONY SPEER	WEEKENDS NIGHTS	(615) 446-0033
b.	JIM MELDON	WEEKENDS NIGHTS	(615) 446-5368
c.			
d.			

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.
AIR PERMIT #'S 035118P THRU 035121P-MARCH 1, 1997 GENERAL STORM WATER PERMIT #TNR000908

10. Check the activities below you are engaged in related to recycling or burning hazardous waste as a fuel.
a. Fuel blending or marketing of hazardous waste as a fuel . . . . . a( )
b. Transporting hazardous waste as fuel . b( )
c. Burning hazardous waste as fuel . . . c( )

d. Do you receive RCRA hazardous waste from off-site and recycle it? Yes ( ), No ( ).

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
James Weldon	V.P. Manufacturing	2-23-94

Below is for Department Use Only.

12. Date received	County code	Priority	Generator	Small Generator	Special status
2-28-94	22		Yes / No	Yes / No	

13. Date closed	Date regulated	Date deregulated

14. Comments

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FEB 28 1994
Solid & Hazardous Div. of Waste

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of all changes.

1. Organization's full, legal name: CECO ENTRY SYSTEMS, EVERGREEN ENTRY SYSTEMS INC.			EPA identification code: TND 09-778-1481
2. Mailing address: ONE CECO PLACE	City: DICKSON	State: TN	Zip code: 37055
3. a. Site address: ONE CECO PLACE, DICKSON, TN 37055	City:	State:	Zip code:	County name: DICKSON
b. Latitude (degrees, minutes & seconds): 36 0248	Longitude (degrees, minutes & seconds): 87.2018		
4. Owner name: GREWOOR, INC		Type:	Phone with area code: (813) 877-2726
5. Manager or operator name: PHILLIP C. SAWYER		Type:	Phone with area code: (615) 446-6220
6. Principal technical contact: TONY SPEER			Phone with area code: (615) 446-6220
7. Number of employees: 200	Year operation began: 1991	SIC codes (Primary SIC first, etc.): 3442,	Job shop: Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	TONY SPEER	WEEKENDS NIGHTS	615/412-4125
b.	BILL COYLE	WEEKENDS NIGHTS	615/646-6668
c.	PHIL SAWYER	WEEKENDS NIGHTS	(615) 353-0415
d.			

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.

AIR PERMIT #'S 035118P THRU 035121P-MARCH 1, 1997 727838P; 939843O; 033163O; 936546O; GENERAL STORMWATER PERMIT #TNR 000906

10. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No (X).

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
[signature]	President	3/14/95

*** Below is for Department use only ***

12. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
03-15 1995	22			Yes ✓	

13. Date closed	Date regulated	Date deregulated

14. Comments: Hand delivered 3/15/95 DW

RECEIVED
MAR 15 1995
DIV. OF
Solid & Hazardous Waste

CN-0909 (Rev. 12/94) RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return. Retain a copy for your records.

1. Organization's full name at facility: CECO ENVIRONMENTAL SYSTEMS, EVERGREEN ENVIRONMENTAL SYSTEMS INC.	EPA identification code: TND 98-178-1381
2. Waste name. Use standard name from regulations whenever possible. DRY PAINT WASTE	Waste Stream number: 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Frequency of generation (C)
NEVER	02/01/94	Continuous / Accidental/ One time / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). g	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
	D007	3442.

5. Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Sludge			8.000	0.0	0.0

6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
2,500.0	30,000.0	2,500.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
NOS HAZARDOUS WASTE WATER REDUCIBLE PAINT	ORM-E	1.2	

8. Describe generation process.
OVER ACCUMULATION FROM PAINT BOOTHS.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( ) ( )
	0		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. CHROMIUM		
b.		
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

RECEIVED
1995

CN-0773 Form Continues on the Back DIV OF RDA 2203 8(Y)
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: CECO ENTRY SYSTEMS, EVERGREEN ENTRY SYSTEMS INC
   EPA identification code: TND 98-778-1481

2. Waste name. Use standard name from regulations whenever possible.: WASTE SOLVENT TOLUOL
   Waste Stream number: 3

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1992- 1994
   Date no longer generated. (MM/DD/YY): 5/20/94
   Frequency of generation: Continuous ------ Accidental/ One time Various (C)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). a
   EPA waste codes. (Primary first; six maximum.): D001,F005
   SIC code for generating process.: 3442.

5. Physical form: Liq-Otar (3)
   % Solid: 5.0
   % Water:
   Vol. to wt. conversion (pounds/gallon): 5.410
   If used for fuel, chlorine content (PPM): 0.0
   BTU per pound: 14,200.0

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): 200.0
   Annual average (kg): 2,400.0
   Maximum amount stored onsite (kg): 600.0
   Maximum days stored: 90

7. DOT shipping name: FLAMMABLE LIQUID TOLUOL
   DOT hazard class: Flam. Liquid 07
   DOT ID code: 1294

8. Describe generation process.

   CLEANING OF DOOR SKINS PRIOR TO PAINTING. THE DIRTY SOLVENT IS ACCUMULATED IN DRUMS AND DISPOSED OF AS A HAZARDOUS WASTE.

9. Chemical Characteristics.
   pH:
   Flash point: 45F
   Reactive code:
   Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( ) ( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. TOLUOL	95	100
b.	0	5
c.	0	5
d.	0	6
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

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MAR 15 1995
Div. of Solid & Hazardous Waste

CW-0773 Form Continues on the Back RDA 2203 1(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: CECO ENTRY SYSTEMS, EVERGREEN ENTRY SYSTEMS INC.
   EPA identification code: IND 98-778-1481

2. Waste name. Use standard name from regulations whenever possible.: URETHANE PAINT WASTE SLUDGE
   Waste Stream number: 5

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1992, 1994
   Date no longer generated. (MM/DD/YY): 01301994
   Frequency of generation (V): Continuous / Accidental/ One time / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). A
   EPA waste codes. (Primary first; six maximum.): D001
   SIC code for generating process.: 3442,

5. Physical form: Slug-Othr (6)
   % Solid: 50
   % Water: 3
   Vol. to wt. conversion (pounds/gallon): 4.550
   If used for fuel, chlorine content (PPM): 0.0
   BTU per pound: 10,000.0

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): 300.0
   Annual average (kg): 300.0
   Maximum amount stored onsite (kg): 300.0
   Maximum days stored: 90

7. DOT shipping name: RQ WASTE PAINT RELATED MATERIAL
   DOT hazard class: Combustible 01
   DOT ID code: NA1263

8. Describe generation process.

9. Chemical Characteristics.
   pH: 4-10
   Flash point: 110
   Reactive code:
   Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( ) (W)

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. BARIUM	500	1500
b. METHYLON-AMYL KETONE	20	25
c. METHYL ISOBUTYL KETONE	15	25
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

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Div. of Solid & Hazardous Waste

CN-0773 Form Continues on the Back RDA 2203 9/91

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct. Certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: CECO ENTRY SYSTEMS, EVERGREEN ENTRY SYSTEMS INC
   EPA identification code: TND 98-778-1481

2. Waste name. Use standard name from regulations whenever possible.: ETHYLENE GLYCOL WASTE WATER
   Waste Stream number: 6

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1992 1993
   Date no longer generated. (MM/DD/YY): 1/01/94
   Frequency of generation: Continuous | Accidental/ One time | Various (V)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). 8C
   EPA waste codes. (Primary first; six maximum.): D008,D039
   SIC code for generating process.: 3442.

5.

Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Liq-Other (3)	5	55	3.900	0.0	0.0

6.

Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
100.0	450.0	450.0	90

7.

DOT shipping name	DOT hazard class		DOT ID code
RQ HAZARDOUS WASTE LIQUID NOS	O R M - E	12	NA3082

8. Describe generation process.

EQUIPMENT IS WORKED ON AND DURING REGULAR MAINTENANCE.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )
8.0-			( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. ETHYLENE GLYCOL	35	45
b. DI ETHYLENE GLYCOL	0	5
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

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Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: CECO ENTRY SYSTEMS, EVERGREEN ENTRY SYSTEMS INC
   EPA identification code: TND 98-778-1481

2. Waste name. Use standard name from regulations whenever possible.: WATERBASED PAINT/SOLVENT MIXTURE
   Waste Stream number: 8

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1992 , 1994
   Date no longer generated. (MM/DD/YY): 12/28/94
   Frequency of generation (V): Continuous | Accidental/ One time | Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). WFB
   EPA waste codes. (Primary first; six maximum.): D001,F003
   SIC code for generating process.: 3442.

5.

Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Slag-Other (6)	40	50	8.170	0.0	5,000.0

6.

Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored onsite (kg)	Maximum days stored
490.0	490.0	490.0	90

7.

DOT shipping name	DOT hazard class		DOT ID code
RQ WASTE PAINT RELATED MATERIAL	Flam. liquid	07	NA1263

8. Describe generation process.
   OPERATION.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )
8.0-	130		( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. MIBK	5	15
b.		
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

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Div. of Solid & Hazardous Waste

CN-0773 Form Continues on the Back RDA 2203 (8/91)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: CECO ENTRY SYSTEMS, EVERGREEN ENTRY SYSTEMS INC.
   EPA identification code: IND 98-778-1481

2. Waste name. Use standard name from regulations whenever possible.: WASTE WATER AND POLYOL BLEND
   Waste Stream number: 9

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1992
   Date no longer generated. (MM/DD/YY): 02211994
   Frequency of generation: Continuous / Accidental/ One time / Various (V)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). f
   EPA waste codes. (Primary first; six maximum.): D018
   SIC code for generating process.: 3442.

5. Physical form: Liq-Wstr (2)
   % Solid: 15
   % Water: 85
   Vol. to wt. conversion (pounds/gallon): 3.820
   If used for fuel, chlorine content (PPM): 0.0
   BTU per pound: 0.0

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): 200.0
   Annual average (kg): 400.0
   Maximum amount stored onsite (kg): 210.0
   Maximum days stored: 90

7. DOT shipping name:
   DOT hazard class: ORM-E 12
   DOT ID code:

8. Describe generation process.

9. Chemical Characteristics.
   pH: 11-1
   Flash point:
   Reactive code:
   Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( ) ( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. TERTIARY AMINE	0	2
b. TRICHLOROFLUOROMETHANE	15	30
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

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CM-0773 Form Continues on the Back RDA 0203 Solid & Hazardous Waste 8/92

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: *CECO ENTRY SYSTEMS, EVERGREEN ENTRY SYSTEMS INC.*
   EPA identification code: *TND 98-778-1481*

2. Waste name. Use standard name from regulations whenever possible.: *CONCRETE SEALER*
   Waste Stream number: *10*

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: xxxx 1993
   Date no longer generated. (MM/DD/YY): *02/11/94*
   Frequency of generation (V): Continuous | Accidental/ One time | Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). *A*
   EPA waste codes. (Primary first; six maximum.): *D001*
   SIC code for generating process.: *3442.*

5. Physical form: *Liq-Othr (3)*
   % Solid:
   % Water: *5*
   Vol. to wt. conversion (pounds/gallon): *3.370*
   If used for fuel, chlorine content (PPM): *0.0*
   BTU per pound: *17,700.0*

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): *188.0*
   Annual average (kg): *188.0*
   Maximum amount stored onsite (kg): *188.0*
   Maximum days stored: *90*

7. DOT shipping name: *RQ WASTE PETROLEUM DISTILLATES NOS*
   DOT hazard class: *Flam. liquid* *07*
   DOT ID code: *UN1268*

8. Describe generation process.

9. Chemical characteristics.
   pH: *5.5*
   Flash point: *140*
   Reactive code:
   Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( ) ( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. *ALIPHATIC HYDROCARBONS*	*14.6*	
b. *ALKYL BENZENES*	*17.0*	
c. *NAPHTHALENE*	*1.0*	
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

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Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: CECO ENTRY SYSTEMS, EVERGREEN ENTRY SYSTEMS INC.
   EPA identification code: TND 98-118-1481

2. Waste name. Use standard name from regulations whenever possible.: WASTE COMBUSTIBLE LIQUID NOS (MINERAL SPIRITS)
   Waste Stream number: 11

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1993
   Date no longer generated. (MM/DD/YY): 01301994
   Frequency of generation (✓): Continuous | Accidental/ One time | Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). AF
   EPA waste codes. (Primary first; six maximum.): D001,D018,D039
   SIC code for generating process.: 3442.

5. Physical form: Liq-Othr (3)
   % Solid: 0.5
   % Water: 2.5
   Vol. to wt. conversion (pounds/gallon): 3.040
   If used for fuel, chlorine content (PPM): 0.0
   BTU per pound: 0.0

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): 91.5
   Annual average (kg): 825.0
   Maximum amount stored onsite (kg): 0.0
   Maximum days stored: 0

7. DOT shipping name: WASTE COMBUSTIBLE LIQUID
   DOT hazard class: O R M - E
   12
   DOT ID code: NA1993

8. Describe generation process.

9. Chemical Characteristics.
   pH:
   Flash point: 105F
   Reactive code:
   Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( ) ( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. PETROLEUM NAPHTHA	80	99
b. OIL WATER & SOLIDS	1	20
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

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CN-0773 Form Continues on the Back. SOLID & HAZARDOUS WASTE RDA 2203 B(Y)

Hazardous Waste Stream Report

Chesapeake Department of Environment and Conservation, Division of Solid Waste Management
[illegible]

1. Drum (Maximum size of 55 gallon drum) REDUCTION/ DISTILLATION - SOLVENT - AVERAGE PER YEAR - SISITKA		EPA Identification code VAD-98-772-1981
2. Waste name. Use standard name from regulations whenever possible. LIGHT AROMATIC SOLVENT WASTE		Waste stream number 12
3. Give the years that this waste has been generated. e.g., 1975, 1982, 1991. 1994	Date no longer generated (MM/DD/YY)	Frequency of generation (C) Continuous / Accidental/ One time / Various
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (e), TCLP (f) a	EPA waste code. (Primary first; six maximum) D001	SIC code for generating process. 3442
5. Physical form. Liq-Dens (3)	% solid 1	% water Vol. to wt. conversion (pounds/gallon) 2.810
	If used for fuel, chlorine content (PPM) 0.0	BTU per pound 20,300.0
6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg) 365.0	Annual average (kg) 3,000.0	Maximum amount stored onsite (kg) 730.0
		Maximum days stored 90
7. DOT shipping name. NA WASTE PETROLEUM DISTILLATES NOS	DOT hazard class Flam. liquid	03
		DOT ID code UN1268

8. Describe generation process.
SOLVENT IS ACCUMULATED IN DRUMS AND DISPOSED OF AS A HAZARDOUS WASTE. MATERIAL REPLACES MAJORITY OF WASTE STREAM. WE AND WILL CREATE A GREATER THAN 1:1 REDUCTION IN ITS GENERATION

9. Chemical characteristics

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume, %, % weight, %, PPM ?
8.5	50		

Major and hazardous constituents. Give range of values at right.	Lower value	Upper value
a. LIGHT AROMATIC SOLVENT N	90	100
b. TOLUENE	0	5
c. XYLENE	0	5
d. ETHYL BENZENE	0	1.4
e.		

10. If this waste is recovered, reclaimed, received or reused, describe how.
FUTURE PLANS CALL FOR DIVERSIFICATION OF SOLVENT RECOVERY TO RECLAIM MATERIAL FOR REUSE AS A CLEANER.

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MAR 15 [illegible]

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes

1. Organization's full, legal name	EPA identification code
PREMDOR ENTRY SYSTEMS EVERGREEN ENTRY SYSTEMS INC	TND 98-778-1481

2. Mailing address	City	State	Zip code
ONE PREMDOR DRIVE	DICKSON	TN	37055

3 a. Site address	City	State	Zip code	County name
ONE PREMDOR DRIVE DICKSON, TN 37055				Dickson

b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)
36.0248	87.2018

4. Owner name (may be corporation or company name)	Type	Phone with area code
PREMDOR, INC	P	(813) 877-2726

5. Manager or operator name	Type	Phone with area code
STEVE WILEY	P	(615) 446-6220

6. Principal technical contact	FAX ~~number with area code~~	Phone with area code
TONY SPEER	(615) 446-7229	(615) 446-6220

7. Number of employees	Year operation began	SIC codes (Primary SIC first, etc.)	Job shop
~~XXX~~ 225	1991	3442, 3069, ,	Yes No ( )

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
~~a.~~	~~TONY WEST~~	~~WEEKENDS NIGHTS~~	~~(615) 446-6506~~
b.	TONY SPEER	WEEKENDS NIGHTS	(615) ~~412-4125~~ 789-3625
c.	STEVE WILEY	WEEKENDS NIGHTS	(615) 799-8204
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No XX

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature ~~of authorized~~ representative	Title	Date
	V.P. & General Manager	2/25/97

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
04/08/1997	22		Yes No Y	Yes No Y	

12. Date closed	TSDR status	Transporter status

13. Comments

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CN-0909 (Rev. 11/95)

RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility PRENDOR ENTRY SYSTEMS EVERGREEN ENTRY SYSTEMS INC	EPA identification code TND 98-778-1481
2. Waste name. Use standard name from regulations whenever possible. LIGHT ALIPHATIC SOLVENT NAPTHA	WASTE STREAM NUMBER 12

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1993		Continuous Accidental/ One time Various (C)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
A	D001	3442,

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	1		2.810	0.0	20,300.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
365.0	3,000.0	~~350~~ 400	~~90~~ 180

7. DOT shipping name	DOT hazard class		DOT ID code
RQ WASTE PETROLEUM DISTILLATES NOS	ORM-D	10	UN1268

8. Describe the generation process.

SOLVENT IS ACCUMULATED IN DRUMS AND DISPOSED OF AS A HAZARDOUS WASTE. MATERIAL REPLACES MAJORITY OF WASTE STREAM #3 AND WILL CREATE A GREATER THAN 1:1 REDUCTION IN ITS GENERATION.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) ( )
8.1	50		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. LIGHT AROMATIC SOLVENT N	90	100
B. TOLUENE	0	5
C. XYLENE	0	5
D. ETHYL BENZENE	0	1.4
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

SC1, T50

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Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility PREMDOR ENTRY SYSTEMS EVERGREEN ENTRY SYSTEMS INC	EPA identification code TND 98-778-1481
2. Waste name. Use standard name from regulations whenever possible. WATER BASED PAINT MIXED WITH MINERAL SPIRITS	WASTE STREAM NUMBER 14

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1994	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation Continuous Accidental/ One time Various (A)
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). A	EPA waste codes. (Primary first; six maximum.) D001,D018	SIC code for generating process. 3442,

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (J)	9	77	0.000	0.0	5,000.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
220.0	220.0	220.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
RQ WASTE FLAMM LIQ NOS (ALIPHATIC & AROMATIC HYDRO	Flam/Comb Liquids	03	

8. Describe the generation process.

EMPLOYEE ACCIDENTALLY MIXED HAZARDOUS WASTE WITH A NON-HAZARDOUS WASTE STREAM.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) (W)
8.9	73F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. VOLATILE ORGANICS	3	10
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

APR 8 1997

1996 Offsite Shipping Report

For wastes shipped offsite only.

Page 1 of 1

TND 98-778-1481 YY - - Nashville

PREMDOR ENTRY SYSTEMS EVERGREEN ENTRY SYSTEMS INC
Attn: TONY SPEER
ONE PREMDOR DRIVE
DICKSON, TN 37055

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2. Waste Streams or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility EPA ID Number	Transporter EPA ID Number	TSDR Handling Codes
a. 12	Light Aliphatic Solvent - NAPTHA	D001	441.9	2	SCD077995488	ILD984908202	S01/S02/T50
b.							
c.							
d.							
e.							
f.							
g.							
h.							
3. Totals: Sum the two columns to the right. Page totals: sum the following two columns. Final totals: sum all page totals on last page of report			441.9	2			

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Vice President & General Manager 02/25/97

CN-0770 (Rev. 1)

7203

TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT
COMPLIANCE MONITORING AND ENFORCEMENT ACTIVITY REPORT

Dickson Co

PH 2430
Rev 9/85

1. ID NO: TND 063741110 Name: PRINTWOOD

ADDRESS: PRINTWOOD PLACE DICKSON TN 37055

2. PROGRAM: Hazardous Waste (X) Solid Waste ( )

3. KEY DATE: (MM-DD-YY) 07-16-86

TYPE OF EVALUATION

4. EVALUATION INSPECTION
07/16/86
(field visits)

A. FULL CHECKLIST
1. HW GEN [1]
2. HW TRANS [2]
3. HW TSDF [3]
4. HW SQ GEN [4]
5. HW NON-NOT (X) [5]
6. SW PROCESSING FACILITY [6]
7. SW LANDFILL [7]
8. PART B INSPECTION [8]

B. OTHER
1. WALK-THROUGH INSP [1]
2. CLOSURE EVAL [2]
3. POST CLOSURE EVAL [3]
4. SPECIAL WASTE EVAL [4]
5. PART A MODIFICATION/WITHDRAWAL EVAL [5]
6. COMPLAINT FOLLOW-UP NOS [6]
7. EMERGENCY RESPONSE [7]
8. OTHER (describe in comments) [8]

5. SAMPLING INSPECTION
___/___/___
1. GENERATED WASTE [1]
2. RECEIVED WASTE [2]
3. SOIL/SEDIMENT [3]
4. SURFACE WATER/LEACHATE [4]
5. GROUND WATER [5]
6. AMBIENT AIR [6]
0 SAMPLES

6. SPECIAL INSPECTION
___/___/___
1. GROUNDWATER MONITORING [1]
2. OTHER (describe in comments) [2]
3. PRELIMINARY GEOLOGIC EVALUATION [3]
4. FINAL GEOLOGIC EVALUATION [4]

7. RECORDS/REPORT REVIEW
___/___/___
(non-permitting)
(in office)
1. CLOSURE PLANS WITH COST ESTIMATES [1]
2. POST CLOSURE PLANS WITH COST ESTIMATE [2]
3. FINANCIAL INSTRUMENTS [3]
4. OTHER REQUIRED PLANS [4]
5. SPECIAL WASTE REQUEST [5]
6. LANDFILL PLANNING ANNUAL REPORT [6]
7. MANIFEST REPORTS [7]
8. MANIFEST RECORDS [8]
9. GWM DATA [9]
10. GWM PLANS [10]
11. OTHER [11]

8. FOLLOW-UP EVALUATION
___/___/___
1. WITH FIELD OFFICE PERSONNEL ONLY [1]
2. WITH CENTRAL OFFICE PERSONNEL [2]
3. FIELD VISIT [3]
4. RECORD REVIEW [4]

9. INCIDENT PROCESSING
___/___/___
1. ORAL COMPLAINT [1]
2. WRITTEN COMPLAINT [2]
3. EMERGENCY RESPONSE CALL [3]
4. OTHER (describe in comments) [4]

10. MISCELLANEOUS
___/___/___
1. FACILITY STATUS EVALUATION MEETINGS/LETTERS [1]
2. OTHER (describe in comments) [2]
3. ABORTED INSPECTION [3]
4. WARNING LETTER [4]

11. VIOLATION CODES: NONE (X)

12. ENFORCEMENT ACTIONS:

	DATE ACTION TAKEN	SCHEDULED COMPLIANCE DATE	ACTUAL COMPLIANCE DATE
NOTICE OF VIOLATION	___/___/___	___/___/___	___/___/___
COMPLIANCE REVIEW MEETING	___/___/___	___/___/___	___/___/___
REFERRED TO ENFORCEMENT SECTION	___/___/___		

13. COMMENTS: (continue on reverse if necessary) Company has been bought out by Tennscon. They did produce metal storage & filing cabinet. Printwood no longer exist. Tennscon is regulated.

KEY OVER ( )

14. PREPARED BY: D. WALL | ID CODE: 084 | DATE: 07-18-86 | FIELD OFFICE: Nashville 102

DSWM LOC
FFR 2 1983

Hazardous Waste Facility Description

Tennessee Department of Public Health, Division of Solid Waste Management,
150 Ninth Avenue North, Seventh Floor, Nashville, Tennessee 37203

1. Organization's full name at facility. Diversified Printing Corporation	EPA identification code TND 980 55 9702

2. Mailing address	City	State abbrev.	ZIP code
P.O. Box 686	Dickson	TN	37055

3a. Does your organization generate waste which is determined to be hazardous by Rule 1200-1-11-.03(1)(b)? Yes XXX	b. Does your facility treat, store, or dispose of hazardous waste subject to permitting rules of 1200-1-11-.07(1)(b)? XXX No

4. Do you request a partial exemption because you are a small generator of hazardous waste as defined in rule 1200-1-11-.02(1)(e)? XXX No

5. Facility physical location or address. Colesburg Rd., Dickson, TN 37055	6. Facility county name Dickson
7. Owner name Diversified Printing Corporation	Phone with area code 615-446-6700
8. Manager or operator name David Cooper - Plant Manager	Phone with area code 615-446-6700
9. Principal technical contact Jerry Jackson - Plant Support Unit Manager	Phone with area code 615-446-6700

10. Number of employees	Years in operation	SIC codes (Primary SIC first, etc.)	Job shop
151	0	2754	XXXX No

11. Emergency contacts for 24 hours per day and 7 days per week.

	Name	Time period covered	Phone with area code
a.	Jerry Jackson	24 hours	615-446-6700
b.	Bob Allen	24 hours	615-446-6700
c.	Pete Graham	24 hours	615-446-6700
d.			

12. Current environmental permits for air water, solid waste and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit.

~~See Attached Sheet~~

992165P - 992170P; 992171F; Municipal and wastewater

13. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of owner or manager	Title	Date
D.C. Cooper	Vice President and Plant Manager	1/31/83

Below is for PH use only.	Date Received	County Code	Priority	Major Genr.	Major TSDF
		22			

15. Public Health comments.

~~Transporter being investigated out~~

PH-2019 (SWM 8/82 Rev.)

CURRENT ENVIRONMENTAL PERMITS

Do not Keep

PERMIT NUMBER	TYPE	SOURCE	DESCRIPTION	EXP. DATE
992171P	State	Air	*Construction Permit for Natural Gas Boilers #1, #2 and #3	4/1/82
992170P	State	Air	Construction Permit for Rotogravure Printing Press #6	6/1/90
992169P	State	Air	Construction Permit for Rotogravure Printing Press #5	12/1/88
992168P	State	Air	Construction Permit for Rotogravure Printing Press #4	6/1/86
992167P	State	Air	Construction Permit for Rotogravure Printing Press #3	6/1/84
992166P	State	Air	Construction Permit for Rotogravure Printing Press #2	3/1/84
992165P	State	Air	*Construction Permit for Rotogravure Printing Press #1	6/1/82
ND980559702	Federal	Hazardous Waste	Permit for the Notification of Hazardous Waste Activity	--
--	Municipal	Industrial Wastewater	Permit to Discharge Pretreated Industrial Wastewater to Dickson STP	--

*Operating Permits applied for.

Hazardous Waste Description

Tennessee Department of Public Health, Division of Solid Waste Management.
150 Ninth Avenue North, Seventh floor, Nashville, Tennessee 37203

1. Organization's full name at facility.	EPA identification code
Diversified Printing Corporation	TND 980 55 9702

2. Waste name. Use standard name from regulations whenever possible.	Waste page #	EPA waste code
Spent Halogenated Solvents	01	F002

3. Is this waste listed in the regulations in Rule 1200-1-11-.02(4)?	Yes ~~No~~	4. Does this waste qualify as hazardous under the criteria of Rule 1200-1-11-.01(3)?	Yes ~~No~~

5. Is this waste exempted from certain regulations according to Rule 1200-1-11-.02(1)(d)3(ii), for examples, fly ash, drilling fluids, mining wastes, and cement kiln dust? Yes No

6. Give the years that this waste has been generated or processed by a treatment, storage, or disposal facility.

0

7. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.

~~Ignitable~~(a), ~~Explosive~~(b), ~~Corrosive~~ (c), ~~Reactive~~ (e), Otherwise toxic (f). codes f

8. Physical form	Percent solid
Liquid	5-15%

8-85

9. Generation or handling rate in kilograms (KG). Monthly Average	Monthly Maximum	Annual average	Frequency of generation
1500	3000	18,000	~~Continuous~~ ~~Seasonal~~ Various

10. Amount stored (Ave. KG)	Days stored (ave.)	Transportation mode
2700	40	~~Rail~~, ~~Water~~, Highway, ~~Air~~, ~~Other~~

H-

DOT shipping name	DOT hazard class	DOT ID. code
Waste Methylene Chloride	ORM - A	UN1593

11. Describe generation process.

Dip Tank Cleaning Solution for Printing Press Parts

Lines 12/15 on back. Below is for department use only.

16. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Curr. Gen.	Initials
Yes No	Yes No	Yes No	Yes No	12	Yes No	SDF

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial Exemption (5); Hazardous (6); Accidental (7).	Status code 5

17. Public Health Comments.

Hazardous Waste Description

Tennessee Department of Public Health, Division of Solid Waste Management.
150 Ninth Avenue North, Seventh Floor, Nashville, Tennessee 37203

F003

1. Organization's full name at facility.	EPA identification code
Diversified Printing Corporation	TND 980 55 9702

2. Waste name. Use standard name from regulations whenever possible.	Waste page #	EPA waste code
Spent Non Halongenated Solvents	02	F003, ~~F005~~

3. Is this waste listed in the regulations in Rule 1200-1-11-.02(4)?	Yes ~~No~~	4. Does this waste qualify as hazardous under the criteria of Rule 1200-1-11-.01(3)?	Yes ~~No~~

5. Is this waste exempted from certain regulations according to Rule 1200-1-11-.02(1)(d)3(ii), for examples, fly ash, drilling fluids, mining wastes, and cement kiln dust? ~~Yes~~ No

6. Give the years that this waste has been generated or processed by a treatment, storage, or disposal facility.

0

7. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.

Ignitable (a), ~~Reactive~~ toxic (b), ~~Corrosive~~ (c), ~~Reactive~~ (e), Otherwise toxic (f). codes a, f

8. Physical form	Percent solid
Liquid	1-10%

3-80

9. Generation or handling rate in kilograms (KG).

Monthly Average	Monthly Maximum	Annual average	Frequency of generation
3,200	4,800	38,000	~~Continuous~~ ~~Seasonally~~ Various

10. Amount stored (Ave. KG)	Days stored (ave.)	Transportation mode
4,800	45	~~Rail~~, ~~Barge~~, Highway, ~~Air~~, ~~Other~~

H

DOT shipping name	DOT hazard class	DOT ID. code
Waste Flammable Liquid n.o.s. (Toluene & Xylene)	Flammable	UN1993

11. Describe generation process.

Floor washing with Hi-Flash Naptha and Wasting of Gravure Ink and Solvent from printing operation.

Lines 12/15 on back. Below is for department use only.

16. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Corr. Gen.	Initials
Yes No	Yes No	Yes No	Yes No	07	Yes No	SJF

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial Exemption (5); Hazardous (6); Accidental (7). Status code 5

17. Public Health Comments.

PH-2022 (SWM 8/82 Rev.)

Hazardous Waste Description

Tennessee Department of Public Health, Division of Solid Waste Management.
150 Ninth Avenue North, Seventh floor, Nashville, Tennessee 37203

1. Organization's full name at facility.	EPA identification code
Diversified Printing Corporation	TND 980 55 9702

2. Waste name. Use standard name from regulations whenever possible.	Waste page #	EPA waste code
Wastewater Treatment Sludges from Electroplating Operations	03	F006

3. Is this waste listed in the regulations in Rule 1200-1-11-.02(4)?	Yes ~~No~~	4. Does this waste qualify as hazardous under the criteria of Rule 1200-1-11-.01(3)?	Yes ~~No~~

5. Is this waste exempted from certain regulations according to Rule 1200-1-11-.02(1)(d)3(ii), for examples, fly ash, drilling fluids, mining wastes, and cement kiln dust? ~~Yes~~ No

6. Give the years that this waste has been generated or processed by a treatment, storage, or disposal facility.

0

7. *Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.*

~~Ignitable~~ (a), ~~Explosive~~ (b), ~~Corrosive~~ (c), ~~Reactive~~ (e), Otherwise toxic (f). codes f

8. Physical form	Percent solid
Solid to Semi-Solid Cake	30-40%

5-60

9. Generation or handling rate in kilograms (KG). Monthly Average	Monthly Maximum	Annual average	Frequency of generation
2,750	3,500	33,000	~~Continuous~~ ~~Seasonal~~ Various

10. Amount stored (Ave. KG)	Days stored (ave.)	Transportation mode
4,000	45	~~Rail~~, Water, Highway, ~~Air~~ ~~Other~~

H -

DOT shipping name	DOT hazard class	DOT ID. code
Hazardous Waste Solid n.o.s.	ORM-E	NA 9189

11. Describe generation process.

Pretreatment of Electroplating Wastewaters Sludge Solidified with Filter Press

Lines 12/15 on back. Below is for department use only.

16. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Curr. Gen.	Initials
Yes No	Yes No	Yes No	Yes No	12	Yes No	SDF

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial Exemption (5); Hazardous (6); Accidental (7). Status code 5

17. Public Health Comments.

PH-2022 (SWM 8/82 Rev.)

Hazardous Waste Description

Tennessee Department of Public Health, Division of Solid Waste Management.
150 Ninth Avenue North, Seventh Floor, Nashville, Tennessee 37203

~~TND 980 550 001~~

1. Organization's full name at facility.	EPA identification code
Diversified Printing Corporation	TND 980 55 9702

2. Waste name. Use standard name from regulations whenever possible.	Waste page #	EPA waste code
Asphaltum and Solvent Waste	04	D001

3. Is this waste listed in the regulations in Rule 1200-1-11-.02(4)?	~~Yes~~ No	4. Does this waste qualify as hazardous under the criteria of Rule 1200-1-11-.01(3)?	Yes ~~No~~

5. Is this waste exempted from certain regulations according to Rule 1200-1-11-.02(1)(d)3(ii), for examples, fly ash, drilling fluids, mining wastes, and cement kiln dust? ~~Yes~~ No

6. Give the years that this waste has been generated or processed by a treatment, storage, or disposal facility.

0

7. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.

Ignitable (a), ~~Reactive~~ (b), ~~Corrosive~~ (c), ~~Reactive~~ (e), ~~Characteristic~~ (f). codes a

8. Physical form	Percent solid
Liquid	5-25%

3-75

9. Generation or handling rate in kilograms (KG). Monthly Average	Monthly Maximum	Annual average	Frequency of generation
1200	2000	15,000	~~Continuous~~ ~~Seasonal~~ Various

10. Amount stored (Ave. KG)	Days stored (ave.)	Transportation mode
1800	45	~~Rail~~, ~~Water~~, Highway, ~~Air~~, ~~Other~~

H

DOT shipping name	DOT hazard class	DOT ID. code
Waste Flammable Liquid n.o.s.	Flammable	UN 1993

11. Describe generation process.

Asphaltum and solvents are used in manufacturing along with water and other chemicals. Immiscible organics are separated in a decanter.

Lines 12/15 on back. Below is for department use only.

16. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Curr. Gen.	Initials
Yes No	Yes No	Yes No	Yes No	07	Yes No	SDF

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial Exemption (5); Hazardous (6); Accidental (7). Status code 5

17. Public Health Comments.

PH-2022 (SWM 8/82 Rev.)

DSWM
L.C

Hazardous Waste Facility Inspection

I. SITE INSPECTED:

TND980559702
Diversified Printing Corp.
P.O. Box 686
Dickson, TN 37055

II. PRIMARY CONTACT:

Jerry Jackson

III. INSPECTION DATE AND TIME:

February 24, 1983
2:00 p.m.

IV. INSPECTOR AND REPORTER:

Bob Gardner
150 9th Avenue North
Nashville, TN

V. OTHER INSPECTION PARTICIPANTS:

Walter Fisher

VI. PURPOSE OF INSPECTION:

This routinely scheduled full inspection was conducted to evaluate Diversified's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

VII. EVALUATION BASIS:

Generator

VIII. FACILITY DESCRIPTION:

Currently four hazardous wastes are produced from the printing operation. Spent non-halogenated solvents are shipped to Stauffer Chemical. All others go to chemical waste management. Oil Services transports all wastes.

DSWM L.C. 9/88

Hazardous Waste Notification Summary

DEC 11, 19

See full instructions for Form RM-2019A for additional information and codes.

1. Organization's name
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION

EPA ID CODE
TND 98-055-9702

2. Mailing address
PO BOX 686

City
DICKSON

State|Zip
TN 37055

3. Physical location or address
COLESBURG ROAD

County name
DICKSON

Latitude | Longitude
.0000 .0000

~~N 870 E30/912 E19~~

4. Owner name
MAXWELL COMMUNICATION INC

Phone
(203) 531-0700

5. MANAGER OR operator name
JAMES H EDWARDS

Phone
(615) 446-6700

6. Principal technical contact
RONALD W IRLINGER

Phone
(615) 446-6700

7. Number of employees | Year began | SIC codes | Job shop
~~269~~ 265 ~~0132~~ 1982 3754, , , YES

8. Emergency contacts

Name	Time period covered	Phone
A LARRY TRIPLETT	9:00AM-5:00PM	(615)446-6700
B RONALD IRLINGER	8:00AM-4:00PM	(615)446-6700
C SECURITY GUARD	5:00PM-8:00AM	(615)446-6700

9. Current environmental permits for air, water, and radiological permits. For each permit type, number and expiration date. In a range of related permits, indicate by giving the first and last permit number.
POLLUTN PERMITS 02144F AIR QUALITY PERMITS 996225P,996420P, 996171P
992170P, 992109P
WASTE WATER (CITY OF DICKSON) 86-01

10. I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date
Vice President and General Manage

Below is for Department use only.

Date rcvd	County	Priority	Generator	Small Gen.	Special status
3/8/86			Yes No	Yes No	

Date closed	Date regulated	Date deregulated	Insp. Freq.
	9/1/82	12/05/84	1

Comments

[illegible]

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Hazardous Waste Stream Report - Front DEC 31, 198

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION | TND 98-055-9702

2. Waste name. | Waste stream ID
METHYLENE CHLORIDE | 1

3. Give years waste generated | Date stopped | Frequency of generation
/ / VARIOUS

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| F |F002 |

5. Physical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 015.0| |0000.000 | |

6. Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
3,000	18,000	2,700	40

7. DOT shipping name | DOT hazard class | DOT ID code
WASTE METHYLENE CHLORIDE | O R M - E | 1593

8. Describe generation process.
DIP TANK CLEANING SOLUTION FOR PRINTING PRESS PARTS NO LONGER GENERATED.

** ANNUAL REPORT SECTION ** LINES 9-11

9. Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987			

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A		Y N	
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . b( ) e. Improved operations. . . . e(
c. Equipment/technology modification c( ) f. No effort. . . . . f(

g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt of Reduction (kg)

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Hazardous Waste Stream Report - Back DEC 31, 198

See full instructions for form PH-2022 for additional information and codes.

Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION | TND 98-055-9702

Waste name. * Waste stream ID
METHYLENE CHLORIDE 1

12. Chemical Characteristics. | Concentration units. For EP toxic
pH | Flash point | Reactive code | wastes, indicate PPM.

Major and hazardous consituents. | lower | upper

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

This Waste is no longer generated.

16. I certify that this information is true, accurate and complete.
SIGNATURE (Generator or authorized representative), title and date.

Vice President and
General Manager

Below is for department use only.

17. Date rcvd | Complete? | Test results? | Reasonable? | Follow-up | Initials
5/2/88 | Yes No | Yes No | Yes No | Yes No | MGC

Status | Not hazardous (1); Demonstrated not hazardous (2); Status | Report
Small generator (3); Resource recovery (4); 8 | N
Partial exemption (5); Hazardous (6);
Accidental (7); No longer generated (8);
Variance granted (9); Conditionally exempt (A);
Mixed radiological wastse (R).

18. Comments.

~~What year was th~~
* ~~what was the date of the last generation~~?
need "date stopped"

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DIV. OF SWM

DSNM L.C. 1988

Hazardous Waste Stream Report - Front DEC 31, 198

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION | TND 98-055-9702

2. Waste name. | Waste stream ID
INK & SOLVENT WASTE | 2

3. Give years waste generated | Date stopped | Frequency of generation
5 YEARS | / / | CONTINUOUS

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES | A,F | F003F005 | 2754

5. Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 020.0 | 0 | 0007.500 | 0 | 15,100

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
6,500 | 78,000 | 20,000 | 90

7. DOT shipping name | DOT hazard class | DOT ID code
RQ Waste Flammable Liquid NOS | FLAMMABLE LIQUID | UN 1993

8. Describe generation process.
WASHING WITH SOLVENT AND WASTING OF GRAVURE INK AND SOLVENT FROM PRINTING OPERATION. INK AND SOLVENT THATHAS LOST ITS STRENGTH FOR PRINTING IS PUMPED OUT OF THE INKFOUNTAINS AND LISTED AS WASTE.

9. ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987	78,000	12,000	6492

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	1350 ~~78,000kg~~	Y N	T16
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . b(x) e. Improved operations. . . . e(
c. Equipment/technology modification c( ) f. No effort. . . . . f(

g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c(x). | Amt of Reduction
32,520 (kg)

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Hazardous Waste Stream Report - Back DEC 31, 196

See full instructions for form PH-2022 for additional information and codes.

Organization's name.
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION

EPA ID CODE
TND 98-055-9702

Waste name.
INK & SOLVENT WASTE

* Waste stream ID
2

12. Chemical Characteristics.

pH	Flash point	Reactive code
7.5	16 F	

Concentration units. For EP toxic wastes, indicate PPM.
% VOLUME

Major and hazardous consituents.

	lower	upper
A ALCOHOL SOLVENTS	38	26
B TOLUENE SOLVENTS	60	70
C XYLENE SOLVENTS	2	4

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

Efforts are taken to segregate the waste by colors so it can be reused in the printing fountains. Disposer reclaims the solvent portion for fuel usage.

16. I certify that this information is true, accurate and complete.
SIGNATURE (Generator or authorized representative), title and date.

James H. Edwards 3/26/88 Vice President and General Manager

Below is for department use only.

17. Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
3/2/88	Yes No	Yes No	Yes No	Yes No	JMC

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R).

Status 4 Report Y N

18. Comments.

RECEIVED MAR 8 1988 DIV OF WATER

Hazardous Waste Stream Report - Front DEC 31, 198

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION | TND 98-055-9702

2. Waste name. | Waste stream ID
PLATING SLUDGE | 3

3. Give years waste generated | Date stopped | Frequency of generation
~~5 years~~ 1982 - / / CONTINUOUS

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f
CODES | B | F006, D007 | 2754

5.

Physical form	% Solid	% Water	Lb./gal.	Chlorine PPM	BTU/lb.
OTHER SOLID	60		0000.000	0	0

6. Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
5,000	52,000	15,000	90

7. DOT shipping name | DOT hazard class | DOT ID code
☒ Waste treatment sludge from electroplating | O R M - E | 9189

8. Describe generation process.
PRETREATMENT OF ELECTROPLATING WASTEWATERS SLUDGE SOLIDIFIED WITH FILTER PRESS RESULT OF ELECTROPLATING AND RE-ETCH WASH WATER TREATMENT AFTER DEWATERING THROUGH FILTER PRESS.

9. ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987	50,625	17,461	3,125

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	~~50,625~~ 64% / *	Y (N)	D80
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . b( ) e. Improved operations. . . . e(X
c. Equipment/technology modification c( ) f. No effort. . . . . f(

g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b(X) c. No change-c( ). | Amt of Reduction
| 15,783 (kg)

* From shipping report

RECEIVED MAR 1988 DIV OF WM

Hazardous Waste Stream Report - Back DEC 31, 198

See full instructions for form PH-2022 for additional information and codes.

Organization's name.
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION

| EPA ID CODE
TND 98-055-9702

Waste name.
PLATING SLUDGE

* Waste stream ID
3

(12) Chemical Characteristics.

pH	Flash point	Reactive code
6.6	>200°F	0

Concentration units. For EP toxic wastes, indicate PPM.
PPM <105 RHM cr, 20 PPM cu

Major and hazardous consituents.	lower	upper
A CHROMIUM	0	100
B COPPER	201	800

(13). If this waste is recovered, reclaimed, recycled, or reused, describe how.

No

16. I certify that this information is true, accurate and complete.
SIGNATURE| (Generator or authorized representative), title and date.

James H Edwards 3/2/88 Vice President and General Manager

Below is for department use only.

17. Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
3/2/88	Yes No	Yes No	Yes No	Yes No	MGC

Status| Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastse (R).

Status 6 Report (Y) N

18. Comments.

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MAR 2 1988
DIV. OF

Hazardous Waste Stream Report - Front DEC 31, 198

as full instructions for form PH-2022 for additional information and codes.

1. Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION TND 98-055-9702

2. Waste name. | Waste stream ID
ASPHALTUM & SOLVENT 4

3. Give years waste generated | Date stopped | Frequency of generation
5 (1982) / / VARIOUS

4. Mark all appropriate hazard criteria below. |EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| A,F |F005 2754

5. Physical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 020.0| |0006.600 | 0 | 16,000

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
1,600 20,000 4,000 90

7. DOT shipping name | DOT hazard class | DOT ID code
RQ Waste flammable Liquid NOS FLAMMABLE LIQUID 1993

8. Describe generation process.
ASPHALTUM AND SOLVENTS ARE USED IN MANUFACTURING ALONG WITH WATER AND OTHER CHEMICALS. IMMISCIBLE ORGANICS ARE SEPARATED IN A DECANTER. WASTE IS GENERATED FROM THE CYLINDER RE-ETCH PROCESS.

** ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987	27,396	825	3,300

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	2492/ ~~27,396~~	Y N	T16
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . b( ) e. Improved operations. . . . e(
c. Equipment/technology modification c( ) f. No effort. . . . . f(

g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c(X). | Amt of Reduction (kg)
0

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from annual report

Hazardous Waste Stream Report - Back DEC 31, 198

See full instructions for form PH-2022 for additional information and codes.

Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION | TND 98-055-9702

Waste name. * Waste stream ID
ASPHALTUM & SOLVENT 4

12. Chemical Characteristics. | Concentration units. For EP toxic wastes, indicate PPM.

pH	Flash point	Reactive code	
7.5	16 F		% VOLUME

Major and hazardous consituents.

	lower	upper
A LACTOL SOLVENTS	20	10
B TOLUENE	30	20
C ASPHALTUM	50	70

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

Disposer reclaims the solvent portion for fuel usage

16. I certify that this information is true, accurate and complete.
SIGNATURE| (Generator or authorized representative), title and date.

James H. Edwards 3/26/88 Vice President and General Manager

Below is for department use only.

17. Date rcvd Complete? Test results? Reasonable? Follow-up Initials

3/2/88 | Yes No | Yes No | Yes No | Yes No MAC

Status| Not hazardous (1); Demonstrated not hazardous (2); Status Report
Small generator (3); Resource recovery (4); 6 4 Y N
Partial exemption (5);Hazardous (6);
Accidental (7); No longer generated (8);
Variance granted (9); Conditionally exempt (A);
Mixed radiological wastse (R).

18. Comments.

RECEIVED MAR 2 1988 D.DIV. OF

Hazardous Waste Stream Report - Front DEC 31, 198

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION TND 98-055-9702

2. Waste name. | Waste stream ID
INK SLUDGE 5

3. Give years waste generated | Date stopped | Frequency of generation
x 1982 - / / CONTINUOUS

4. Mark all appropriate hazard criteria below. |EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| A |D001 |2754

5. Physical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb.
OTHER SOLID | 091.0| |0011.000 | |

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
2,900 35,000 8,700 90

7. DOT shipping name | DOT hazard class | DOT ID code
Hazardous waste solid, NOS ORM-E NA 9189 (12)

8. Describe generation process.
REMOVAL OF SETTLED INK SOLIDS FROM INK FOUNTAINS. BOTTOMS FROM INK FOUNTAINS

** ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987	31,900	1,650	1,000

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	32550 *	Y N	D80
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . b( ) e. Improved operations. . . . e(
c. Equipment/technology modification c( ) f. No effort. . . . . f(
g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b(X) c. No change-c( ). | Amt of Reduction
| 1225 (kg)

* From shipping report

Hazardous Waste Stream Report - Back DEC 31, 198

See full instructions for form PH-2022 for additional information and codes.

Organization's name.
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION

EPA ID CODE
TND 98-055-9702

Waste name.
INK SLUDGE

* Waste stream ID
5

12. Chemical Characteristics.
pH | Flash point | Reactive code |
85°F

Concentration units. For EP toxic wastes, indicate PPM.
% VOLUME

Major and hazardous consituents.	lower	upper
A ORGANIC RESINS & PIGMENTS	15	15
B HYDROCARBON SOLVENTS	6	9
C INORGANIC MATERIAL (PAPER DUST & CLAY)	20	76
D INORGANIC MATERIAL (PAPER DUST)	59	62

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

16. I certify that this information is true, accurate and complete.
SIGNATURE| (Generator or authorized representative), title and date.
James H. Edwards 3/26/88 Vice President General Manager

Below is for department use only.

17. Date rcvd Complete? Test results? Reasonable? Follow-up Initials
3/2/88 | Yes No | Yes No | Yes No | Yes No MMC

Status| Not hazardous (1); Demonstrated not hazardous (2); Status Report
Small generator (3); Resource recovery (4); 6 I M
Partial exemption (5);Hazardous (6);
Accidental (7); No longer generated (8);
Variance granted (9); Conditionally exempt (A);
Mixed radiological wastse (R).

18. Comments.

RECEIVED
MAR 2 1988
DIV. OF SWM

Hazardous Waste Stream Report - Front DEC 31, 198

See full instructions for form PN-2022 for additional information and codes.

1. Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION | TND 98-055-9702

2. Waste name. | Waste stream ID
WASTE, MINERAL SPIRITS, PARTS WASH SOLVENT | 8

3. ~~Give years~~ waste generated | Date stopped | Frequency of generation
1985 | / / | VARIOUS

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| A |D001 12754

5. Physical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 010.0| |0007.000 | |

6. Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
400	5,000	1,680	30

7. DOT shipping name | DOT hazard class | DOT ID code
WASTE PETROLEUM NAPTHA | FLAMMABLE LIQUID | 1255

8. Describe generation process.
USED IN PARTS WASHING MACHINE

** ANNUAL REPORT SECTION ** LINES 9-11

9. Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987	4321	1680	1680

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	4321*	Y N	T-63
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . b( ) e. Improved operations. . . . e(
c. Equipment/technology modification c( ) f. No effort. . . . . f(

g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt of Reduction (kg)

* From shipping reports

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Hazardous Waste Stream Report - Back DEC 31, 198

See full instructions for form PH-2022 for additional information and codes.

Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION | TND 98-055-9702

Waste name. * Waste stream ID
WASTE, MINERAL SPIRITS, PARTS WASH SOLVENT 8

12. Chemical Characteristics. | Concentration units. For EP toxic wastes, indicate PPM.

pH	Flash point	Reactive code
7.5	105	

% VOLUME

Major and hazardous consituents.	lower	upper
A MINERAL SPIRITS	99.0	99.9
B DYE	.003	.002
C ANTI-STATIC	.05	1

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

This waste is recycled through the Safety-Kleen Corp.

16. I certify that this information is true, accurate and complete.
SIGNATURE| (Generator or authorized representative), title and date.

James H. Edwards 3/21/88 Vice President and General Manager

Below is for department use only.

17. Date rcvd Complete? Test results? Reasonable? Follow-up Initials

Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
3/7/88	Yes No	Yes No	Yes No	Yes No	MMC

Status| Not hazardous (1); Demonstrated not hazardous (2); Status Report
Small generator (3); Resource recovery (4); 6 Y N
Partial exemption (5);Hazardous (6); 4
Accidental (7); No longer generated (8);
Variance granted (9); Conditionally exempt (A);
Mixed radiological wastse (R).

18. Comments.

Hazardous Waste Stream Report - Fr[illegible] DEC 13, 1990

DSWM L&C

Mark changes on this form. Full instructions are given with Form PH-2022.

1. Organization's name. | EPA ID CODE
GUEBECOR PRINTING DICKSON INC | TND 98-055-9702

2. Waste name. | Waste stream ID
INK & SOLVENT WASTE | 2

3. Give years waste generated | Date stopped | Frequency of generation
1983 - ~~[illegible]~~ | /00/00 | CONTINUOUS

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES: A,~~X~~ | F003F005 | 2754

5. Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 20.0 | | 7.500 | .0 | 15100.0

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
~~9,264~~ 12,000 | ~~111,170~~ 206,000 | ~~31,574~~ 51,000 | 90

7. DOT shipping name | DOT hazard class | DOT ID code
RG WASTE FLAMMABLE LIQUID NOS | FLAMMABLE LIQUID | UN1993

8. Describe generation process. waste
WASHING WITH SOLVENT AND ~~WASTING OF~~ GRAVURE INK AND^SOLVENTFROM PRINTING OPERATION. INK AND SOLVENT THATHAS^LOST ITS STRENGTH FOR PRINTING IS PUMPED OUT OF THE^INKFOUNTAINS AND LISTED AS WASTE.^

** ANNUAL REPORT SECTION ** LINES 9-11

9.

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1990	205,898	21,730	20,546

	Amount Handled by site		TSDF handling/Waste management methods
A	OFFSITE: 207,081	N	502,763
B	ONSITE:	Y	
C	ONSITE:	Y	
D	ONSITE:	Y	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( ) d. Substituting raw materials d( )
b. In process recycling. . . . . b(X) e. Improved operations. . . . e(X)
c. Equipment/technology modification c( ) f. No effort. . . . . f( )

g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c(X). | Amt of Reduction (kg)

FEB 21 1991

Hazardous Waste Stream Report - Back DEC 13, 1990

Mark changes on this form. Full instructions are given with Form PH-2022.

Organization's name.
QUEBECOR PRINTING DICKSON INC

EPA ID CODE
TND 98-055-9702

Waste name.
INK & SOLVENT WASTE

Waste stream ID
2

12. Chemical Characteristics.

pH	Flash point	Reactive code
7.5	16 F	

Concentration units. For EP toxic wastes, indicate PPM.
% VOLUME

Major and hazardous consituents.	lower	upper
A LACTOL SOLVENTS	~~30~~ 14	~~26~~ 28
B TOLUENE SOLVENTS	~~60~~ 70	~~70~~ 80
C XYLENE SOLVENTS	2	~~4~~ 06

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.
A portion of the Ink and Solvent Waste is separated by color and re-used in the printing process. The remaining waste is shipped to a fuel blender.

16. I certify that this information is true, accurate and complete.
SIGNATURE (Generator or authorized representative), title and date.
Robert W Gellathy Engineering/Maintenance Mgr. 2/20/91

Below is for department use only.

17. Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
022491	(Yes) No	Yes (No)	(Yes) No	Yes (No)	DBM

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R); Corrective action (C).

Status	Report
4	Y

18. Comments.

Mark changes on this form. Full instructions are given with Form PH-2022.

1. Organization's name. | EPA ID CODE
QUEBECOR PRINTING DICKSON INC | TND 98-055-9702

2. Waste name. | Waste stream ID
WASTE, MINERAL SPIRITS, PARTS WASH SOLVENT | 8

3. Give years waste generated | Date stopped | Frequency of generation
1986-1990 | /00/00 | VARIOUS

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES | A | D001 | 2754

5. Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 10.0 | | 7.000 | .0 | .0

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
~~77~~ | 1777 ~~920~~ | ~~650~~ 0 | ~~90~~ 0

7. DOT shipping name | DOT hazard class | DOT ID code
WASTE PETROLEUM NAPTHA | FLAMMABLE LIQUID | 1255
Combustible Liquid

8. Describe generation process.
USED IN PARTS WASHING MACHINE^

9. ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1990	1777	0	0

	Amount Handled by site		TSDF handling/Waste management methods
A	OFFSITE: 1777	N	T63
B	ONSITE:	Y	
C	ONSITE:	Y	
D	ONSITE:	Y	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
a. Reformulation/redesign of product a( ) d. Substituting raw materials d( )
b. In process recycling. . . . . b( ) e. Improved operations. . . . e(X)
c. Equipment/technology modification c( ) f. No effort. . . . . f( )
g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c(X). | Amt of Reduction (kg)

FEB 21 1991

Hazardous Waste Stream Report - Front JAN 05, 1990

Mark changes on this form. Full instructions are given with Form PH-2022.

1. Organization's name. | EPA ID CODE
MAXWELL GRAPHICS MORRISTOWN INC DICKSON DIVISION | TND 98-055-9702

2. Waste name. | Waste stream ID
SPENT TRICHLOROMONO FLUROMETHANE | 9

3. Give years waste generated | Date stopped | Frequency of generation
1988 -1988 | 9/21/88 | VARIOUS

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES | F002 | 2754

5. Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 0 | | 12.330 | 0 | .0

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
327 | 327 | 327 | 90

7. DOT shipping name | DOT hazard class | DOT ID code
HAZARDOUS WASTE LIQUID NOS | O R M - E | NA9189

8. Describe generation process.
SPENT FREON FROM CHILLER.^

ANNUAL REPORT SECTION ** LINES 9-11

9.

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1989	0	0	0

	Amount Handled by site		TSDF handling/Waste management methods
A	OFFSITE:	N	
B	ONSITE:	Y	
C	ONSITE:	Y	
D	ONSITE:	Y	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

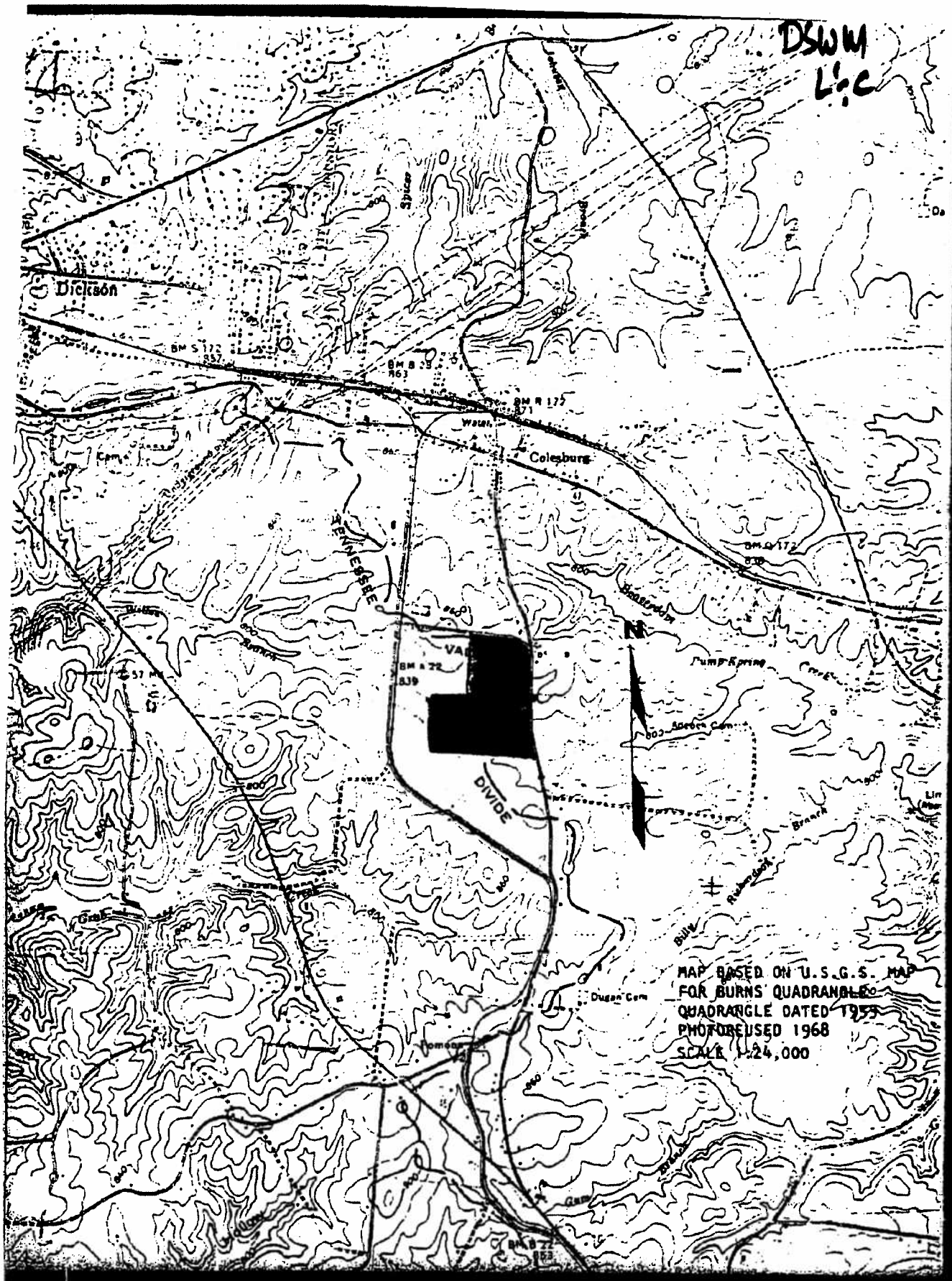
a. Reformulation/redesign of product a( )
b. In process recycling. . . . . b( )
c. Equipment/technology modification c( )
d. Substituting raw materials d( )
e. Improved operations. . . . e( )
f. No effort. . . . . f( )

g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt of Reduction (kg)

MAR 1 1990


DSWM
L&C
Dickson
Colesburg
TENNESSEE
DIVIDE
Pump Spring
Creek
Dugan Cem
Branch
Rubendall
Bully
Cem
N
MAP BASED ON U.S.G.S. MAP
FOR BURNS QUADRANGLE
QUADRANGLE DATED 1955
PHOTOREVISED 1968
SCALE 1:24,000

DENNM L&C

CURRENT ENVIRONMENTAL PERMITS

PERMIT NUMBER	TYPE	SOURCE	DESCRIPTION	EXP. DATE
992171P	State	Air	*Construction Permit for Natural Gas Boilers #1, #2 and #3	4/1/82
992170P	State	Air	Construction Permit for Rotogravure Printing Press #6	6/1/90
992169P	State	Air	Construction Permit for Rotogravure Printing Press #5	12/1/88
992168P	State	Air	Construction Permit for Rotogravure Printing Press #4	6/1/86
992167P	State	Air	Construction Permit for Rotogravure Printing Press #3	6/1/84
992166P	State	Air	Construction Permit for Rotogravure Printing Press #2	3/1/84
992165P	State	Air	*Construction Permit for Rotogravure Printing Press #1	6/1/82
TN0980559702	Federal	Hazardous Waste	Permit for the Notification of Hazardous Waste Activity	--
	Municipal	Industrial Wastewater	Permit to Discharge Pretreated Industrial Wastewater to Dickson STP	--

*Operating Permits applied for.

8/1/90
DSWM
L.C

QUEBECOR PRINTING, INC.
(FORMERLY MAXWELL GRAPHICS)
DICKSON, TENNESSEE
ENFORCEMENT REQUEST

I. SUMMARY

Quebecor operates a rotogravure printing process. The following hazardous waste streams are generated:

(a) F003/F005 ink and solvent waste
(b) F006/007 plating sludge
(c) D001 ink sludge
(d) D001 parts washing solvent waste

A routine hazardous waste generator inspection was done on July 24, 1990. Violations relating to excess storage time, improper storage, improper storage container identification, lack of notification up-date, inadequate storage area inspections, inadequate personnel training and records, and inadequate contingency plan were noted. Manifests showed the plating sludge had been stored for 110 days, from 3-24-90 until 7-12-90. Some drums containing waste were not closed. Many drums containing waste in an inside storage area were not identified as containing hazardous waste, had no accumulation start-up date marked, and were not placed such that adequate aisle space was maintained. The 9,000 gallon outside storage tank was not identified as containing hazardous waste. No record of storage area inspections had been made since 1988. Personnel training had not been kept up-to-date and records of training were not available. The contingency plan had not been up-dated since 1982 to reflect changes that had taken place. No notification of the facility's name change had been sent to Division of Solid Waste Management.

II. CHRONOLOGY

July 24, 1990 - routine hazardous waste inspection made.

August 1, 1990 - NOV and inspection report sent to Quebecor.

III. VIOLATOR

Quebecor Printing, Inc.
P. O. Box 686
Dickson, TN 37055

IV. Rule 1200-1-11-.07(1)(b)1(ii) prohibits an existing hazardous waste management facility, in Tennessee, from treating, storing, or disposing of hazardous waste unless the owner or operator has a permit under the Tennessee Hazardous Waste Management Act or interim status. (3510)

Rule 1200-1-11-.03(4)(e)2(i) allows for a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator, if the waste is stored in containers, ensures that containers holding hazardous waste are always kept closed during storage, except when it is necessary to add or remove waste. (3635)

Rule 1200-1-11-.03(4)(e)2(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

Rule 1200-1-11-.03(4)(e)2(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste is being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste". (0525)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains adequate aisle space to allow the unobstructed movement of employees, fire protection equipment, spill control equipment, and decontamination equipment in any emergency unless aisle space is not needed for any of these purposes. (0605)

Rule 1200-1-11-.03(2)(d) requires generators to be responsible for maintaining an up-to-date notification file by notifying the Department in writing of significant changes in the information submitted within 30 days after such changes. (0027)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator records inspections in an inspection log or summary. The generator must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observation made, and the date and nature of any repairs or other remedial actions. (0087)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program, at a minimum be designed to ensure that employees are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems including where applicable: (1) procedure for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) key parameters for automatic waste feed cut-off systems (if any); (3) communications or alarm systems; (4) response to fires or explosions; (5) response to ground-water contamination incidents; and (6) shutdown of operations. (0107)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains

records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management. (0127)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (0128)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste. (0135)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0145)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation area(s): no waste that may be incompatible with the released material is stored in the accumulation area until clean-up procedures are completed; and all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0174)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have been completed and all emergency equipment has been cleaned and fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0175)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists the names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator and keep this list up-to-date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. (0185)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists all emergency equipment at the accumulation area (such as fire extinguishing systems, spill control equipment, communications and alarm system (internal and external), and decontamination equipment where this equipment is required. This list must be kept up-to-date. (0195)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator reviews and, if necessary, immediately amends the contingency plan whenever applicable regulations are revised. (0211)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator reviews and, if necessary, immediately amends the contingency plan whenever the accumulation area changes (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency. (0213)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator reviews and, if necessary, immediately amends the contingency plan whenever the list of emergency coordinators changes. (0214)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator reviews and, if necessary, amends the contingency plan whenever the list of emergency equipment changes. (0215)

V. **PERSONNEL INVOLVED**

Dimitra Syriopoulou, Environmental Engineer, DSWM
Nashville Field Office, 741-0654

Mark McWhorter, Environmental Specialist, DSWM
Nashville Field Office, 741-0654.

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator reviews and, if necessary, immediately amends the contingency plan whenever applicable regulations are revised. (0211)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator reviews and, if necessary, immediately amends the contingency plan whenever the accumulation area changes (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency. (0213)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator reviews and, if necessary, immediately amends the contingency plan whenever the list of emergency coordinators changes. (0214)

Rule 1200-1-11-.03(4)(e)2(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator reviews and, if necessary, amends the contingency plan whenever the list of emergency equipment changes. (0215)

RECOMMENDATIONS AND REMARKS:

The manifest review during the inspection showed that the F006/D007 plating sludge was accumulated on-site for more than 90 days (consecutive shipments dates: 3/23/90 and 7/12/90).

During the site inspection, the following were discovered:

(a) The roll-off container holding the F006/D007 sludge was not covered, not labeled and not dated;

(b) The tank holding the F003/F005 ink and solvent waste was not marked with the words "Hazardous Waste";

(c) The drums in the accumulation area inside the plant near the baler were not marked with the words "Hazardous Waste" and with the accumulation start date;

(d) No adequate aisle space was maintained in the accumulation area near the baler.

With respect to the review of records, plans and reports, the following were discovered:

(a) The name of the facility had been changed to "Quebecor Printing, Inc." since March, 1990, but the Department of Health and Environment (DHE) had not been notified of this change;

(b) No inspection logs had been kept since 1988;

(c) The existing personnel training program and records had been inadequate;

(d) The existing contingency plan had not been updated since 1987.

During the inspection, a RCRA Land Disposal Restriction checklist was completed.

Signed: Dimitra Syriopoulou

Date: 8-1-90

DS/rJD20713 SW-188

DSWM
L&C

OCT 10 1991

TENNESSEE DEPARTMENT OF CONSERVATION

TERRA BUILDING
150 Ninth Avenue North
Nashville, Tennessee 37243-1548

October 9, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT #P 384 021 713

Mr. Ron Irlinger
Quebecor Priesting Dickson
Colesburg Road
P.O. Box 686
Dickson, Tennessee 37055

RE: COMMISSIONER'S ORDER NO. 91-D046
CASE NO. 91-3310

Dear Mr. Irlinger:

Enclosed is a copy of the Consent Order that has been field with the Secretary of State.

Thank you for your cooperation in resolving this matter.

Sincerely,

E. Joseph Sanders
Assistant General Counsel

Enclosure

xc: Linda Tidwell
[redacted]

EJS/plj/E9011282/D6/OGC

BEFORE THE SOLID WASTE DISPOSAL CONTROL BOARD

IN THE MATTER OF:

QUEBECOR PRINTING DICKSON, INC.	DIVISION OF SOLID WASTE MANAGEMENT
RESPONDENT	FILE NO. 91-2310
	CASE NO. 90-0010
	AFD DOC. NO. 17.27-D-90-0404-A

CONSENT ORDER

Upon consent of the parties this matter came before the Solid Waste Disposal Control Board. After consideration, the Board found as follows:

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. The facts set out in Sections I through III and VII through X of the Commissioner's Order issued June 21, 1991, are found to be true and are hereby incorporated by reference.

2. The conclusions of law set out in Sections IV, V, VI and XI of the referenced Commissioner's Order are found to be true and are hereby incorporated by reference.

ORDER

WHEREFORE, PREMISES CONSIDERED the Board hereby ORDERS that:

1. The Respondent shall hereafter comply with the Tennessee Hazardous Waste Management Act and all Division Rules.

REASONS FOR DECISION

The above Findings of Facts and Conclusions of Law, and the Orders were made in an effort to provide a coordinated system of control and management under the Tennessee Hazardous Waste Management Act. The purpose of said Act is to control and manage the transportation, disposal, treatment and storage of hazardous wastes in a manner that protects the health, safety and welfare of the public. The Board encourages settling cases in the interest of avoiding the time and expense of prolonged litigation.

Adopted and approved by a majority of the Board, a quorum being present, this 8th day of October, 1991.

FOR THE SOLID WASTE DISPOSAL
CONTROL BOARD

Rafael B. Bustamante
Chairman

APPROVED FOR ENTRY

E. Joseph Sanders
Assistant General Counsel
Tennessee Department of Environment and Conservation

By: Ron Irlinger
Quebecor Printing Dickson, Inc.

RIGHTS OF APPEAL

Respondent is hereby notified and advised of its right to

characteristic and listed hazardous wastes pursuant to Tennessee's Hazardous Waste Management Regulations (Division Rules), Rule Chapter 1200-1-11-.02(3) and (4).

VIII.

The Respondent doing business in 1981 as Diversified Printing submitted a hazardous waste notification to the U.S. Environmental Protection Agency (EPA) in August, 1981. Diversified Printing was assigned the EPA identification number TND 98 055 9702. Subsequently, the Respondent's facility name changed to Maxwell Graphics, Morristown, Inc., Dickson Division. In March, 1990 the Respondent's facility was purchased by Quebecor, Inc. and the name was changed to Quebecor Printing Dickson, Inc.

IX.

On July 24, 1990, representatives of the Division conducted a hazardous waste generator inspection at the Respondent's facility. Twenty violations of Division Rule 1200-1-11-.03 and one violation of Rule 1200-1-11-.07 were identified. A Notice of Violation was issued on August 1, 1990, listing the aforementioned violations.

X.

During this inspection, the Division representatives reviewed the Respondent's manifest documents. These documents revealed that the Respondent shipped F006 sludge off-site on March 23, 1990 and again on July 12, 1990, respectively. More than ninety days elapsed from the time the sludge was generated until it was shipped to an off-site treatment, storage, or disposal facility.

VIOLATIONS

XI.

By storing hazardous waste in excess of ninety (90) days, the Respondent has violated Tennessee Code Annotated Section 68-46-105(3) and (4) which states, in part:

> "It shall be unlawful to:
>
> (3) Construct, alter, operate, own, close, or maintain after closure a hazardous waste treatment, storage, or disposal facility in violation of the rules and regulations established under the provisions of this part or in violation of orders of the commissioner or board, or in such a manner as to create a public nuisance or a hazard to public health;
>
> (4) Store, containerize, label, transport, treat or dispose of hazardous waste or fail to provide information in violation of the rules, regulations, or orders of the commissioner or board, or in such a manner as to create a public nuisance or a hazard to the public health;. . . ."

and has also violated Division Rule 1200-1-11-.07(1)(b)1 which states, in part:

> (ii) No existing hazardous waste management facility in Tennessee can lawfully treat, store, or dispose of hazardous waste unless the owner and operator has a permit under the Act or interim status as provided in paragraph (3) of this Rule.

ORDER

WHEREFORE, PREMISES CONSIDERED, pursuant to the authority vested by T.C.A. Section 68-46-114 and T.C.A. Section 68-46-111, I, Tom Tiesler, acting as the authorized representative of the Commissioner, hereby, after proper consideration of the harm done to the public health or the environment, the economic benefit gained by the violator, the amount of effort put forth by the violator to attain compliance, and any unusual or extraordinary enforcement costs incurred by the Commissioner, ORDER that:

DSWM L&C

1992 Hazardous Waste Generator Maintenance Fees

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
701 Broadway, Fourth Floor, Customs House, Nashville, Tennessee 37243-1535

Instructions

Line 1: Complete the following to determine if you owe the hazardous waste maintenance fee for generators.

1.1 If you shipped hazardous waste offsite in calendar year 1991, enter the total amount in kilograms. 319,184 kg

1.2 Enter the amount of hazardous waste shipped off site in 1991 that was completely excluded under Rule 1200-1-11- 02(1)(d)3(ii), e.g. fly ash, drilling fluids, and cement kiln dusts. Enter the amount in kilograms. -0- kg

1.3 Subtract line 1.2 from line 1.1 and enter the difference. 319,184 kg

1.4 Enter the number of months in 1991 that you generated 100 kilograms or more but less than 1,000 kilograms of hazardous waste. -0-

1.5. Enter the number of times you accumulated 1,000 kilograms or more of hazardous waste in 1991 before shipping off site. 38

1.6 Enter the number of times you generated or accumulated one or more kilograms of acutely hazardous waste in 1991. See Rule 1200-1-11-.02(4)(d)5. -0-

1.7 Enter the number of months in 1991 that you generated 1,000 kilograms or more of hazardous waste. 12

1.8 Add lines 1.4 through 1.7 and enter the sum disregarding the units of measurement. 50

If either lines 1.3 or 1.8 are zero, you owe no fee. Enter zero in line 1 below and skip to line 2.

If either line 1.6 or 1.7 is greater than zero, enter $700 on line 1 below and skip to line 2. Otherwise ...

Enter $350 on line 1 below and continue on line 2.

Line 2: Certify that the information given is true, accurate and complete by an authorized representative of the site. Sign, give title and date.

Return the certified form even if no fees are due.

Please complete and return the original to the above address.

TND 98-055-9702 YN-- Nashville

QUEBECOR PRINTING DICKSON INC
Attn: RON IRLINGER
PO BOX 686
DICKSON, TN 37055

For technical assistance, call 1-(800) 231-7018 (in Tennessee only.)

1. See the instructions to determine if you owe a hazardous waste generator maintenance fee. If you are a fully regulated generator, enter $700. If you are a small quantity generator, enter $350. Else, enter zero. Submit the completed form with your check or money order payable to Tennessee Department of Environment and Conservation. Do not send cash.	$700.00

2. Certify that the information given above is true, accurate and complete.

Signature of owner, manager or authorized representative.	Title	Date
Robert W Gellathy	Eng. Manager	2/24/92

For DEPARTMENT USE CD No.	Date received	Amount	Receipt	Comments
ASW0860	MAR - 3 1992	$700	AA9507	See E. Mansson internal memo

CD-0906 (12/91)

MAR - 3 1992

DS6M L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

1. Organization's full, legal name			EPA identification code
Quebecor Printing Dickson Inc.			TND 98-055-9702
2. Mailing address	City	State	Zip code
3. a. Site address	City	State	Zip code / County name
b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)		
4. Owner name (may be corporation or company name)		Type	Phone with area code
5. Manager or operator name		Type	Phone with area code
6. Principal technical contact	FAX number with area code		Phone with area code
7. Number of employees	Year operation began	SIC codes (Primary SIC first,etc.)	Job shop
			Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
a.		
b.		
c.		
d.		

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
03/03/1997			Yes No	Yes No	
12. Date closed	TSDR status	Transporter status			

13. Comments

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility QUEBECOR PRINTING DICKSON INC	EPA identification code TND 98-055-9702
2. Waste name. Use standard name from regulations whenever possible. PLATING SLUDGE	WASTE STREAM NUMBER 3

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1982-		Continuous Accidental/ One time Various (C)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
g	F006	2754,

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Sld:Othr (9)	60.0	40	0.000	0.0	0.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
3,000.0	30,000.0	9,000.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
RQ HAZARDOUS WASTE SOLID NOS.	ORM-D	10	3077

8. Describe the generation process.

PRETREATMENT OF ELECTROPLATING WASTEWATERS SLUDGE SOLIDIFIED WITH FILTER PRESS RESULT OF ELECTROPLATING AND RE-ETCH WASH WATER TREATMENT AFTER DEWATERING THROUGH FILTER PRESS.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) (P)
6.6	200 F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. CHROMIUM	1000	15000
B. COPPER	65000	140000
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste ***through final disposition***.
Use the Waste Management Method Codes on page 6 of the instructions.

RECEIVED
MAR 03 1997
Solid Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility QUEBECOR PRINTING DICKSON INC	EPA identification code TND 98-055-9702
2. Waste name. Use standard name from regulations whenever possible. INK & SOLVENT WASTE	WASTE STREAM NUMBER 2

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1983-		Continuous Accidental/ One time Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
A	F005,D001	2754,

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (J)	20.0	.0	8.300	0.0	15,100.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
14,000.0	120,000.0	40,000.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
RQ WASTE FLAMMABLE LIQUID NOS	3RM-0	10	UN1993

8. Describe the generation process.

#WASHING WITH SOLVENT AND WASTE GRAVURE INK AND SOLVENTFROM PRINTING OPERATION. INK AND SOLVENT THATHAS LOST ITS STRENGTH FOR PRINTING IS PUMPED OUT OF THE INKFOUNTAINS AND LISTED AS WASTE.

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
7.5	16 F		(V)

Hazardous constituents. Give range of values at right.	lower value	upper value
A. ALCOHOL SOLVENTS	30	48
B. TOLUENE SOLVENTS	50	65.
C. XYLENE SOLVENTS	2	06
D.		
E.		

10. Describe how you have managed or intend to manage this waste ***through final disposition***.
Use the Waste Management Method Codes on page 6 of the instructions.

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Solid Waste

4(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility QUEBECOR PRINTING DICKSON INC	EPA identification code TNO 98-055-9702
2. Waste name. Use standard name from regulations whenever possible. INK SLUDGE	**WASTE STREAM NUMBER** 5

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1982-		Continuous Accidental/ One time Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
A	D001	2754.

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Sld:Othr (9)	91.0	.0	11.000	0.0	6,000.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
5,900.0	71,400.0	17,700.0	90.

7. DOT shipping name	DOT hazard class		DOT ID code
HAZARDOUS WASTE SOLID, NOS	ORM-D		NA9277

8. Describe the generation process.

REMOVAL OF SETTLED INK SOLIDS FROM INK FOUNTAINS. BOTTOMS FROM INK FOUNTAINS

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
	55 F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A. ORGANIC RESINS & PIGMENTS	15	15
B. HYDROCARBON SOLVENTS	6	9
C. INORGANIC MATERIAL (PAPER DUST & CLAY	20	70
D. INORGANIC MATERIAL (PAPER DUST	50	50
E.		

10. Describe how you have managed or intend to manage this waste ***through final disposition***.
Use the Waste Management Method Codes on page 6 of the instructions.

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MAR 03 1997
Solid Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility QUEBECOR PRINTING DICKSON INC	EPA identification code TND 98-055-9702
2. Waste name. Use standard name from regulations whenever possible. WASTE, MINERAL SPIRITS, PARTS WASH SOLVENT	WASTE STREAM NUMBER 9

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1996-	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation Continuous Accidental/ Various One time
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). A	EPA waste codes. (Primary first; six maximum.) D001	SIC code for generating process. 2754,

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	10.0	.0	7.000	0.0	0.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
77.0	1,777.0	0.0	0

7. DOT shipping name	DOT hazard class		DOT ID code
WASTE COMBUSTIBLE LIQUID NOS	ORM-D	10	NA1993

8. Describe the generation process.
USED IN PARTS WASHING MACHINE

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
7.5	105		(V)

Hazardous constituents. Give range of values at right.	lower value	upper value
A. MINERAL SPIRITS	99.0	99.9
B. DYE	.005	.002
C. ANTI-STATIC	.05	1
D.		
E.		

10. Describe how you have managed or intend to manage this waste ***through final disposition***.
Use the Waste Management Method Codes on page 6 of the instructions.

S01, T63

4(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535
Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility QUEBECOR PRINTING DICKSON INC	EPA identification code TND 98-055-9702
2. Waste name. Use standard name from regulations whenever possible. WASTE FILM DEVELOPER	WASTE STREAM NUMBER 12

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1995-		~~Continuous~~ Accidental/ One time Various (C)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
CG	D002,D011	2754,

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Sldg-Watr (5)		90-90	8.300	0.0	0.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
95.0	830.0	285.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
WASTE CORROSIVE LIQUID NOS	Corrosive	08	UN1760

8. Describe the generation process.
AS FILM DEVELOPER LOSES ITS STRENGTH, IT IS REMOVED FROM THE MACHINE AND IS REPLENISHED WITH NEW DEVELOPER.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) (Y)
<2			

Hazardous constituents. Give range of values at right.	lower value	upper value
A. ACETIC ACID	.5	5
B. ALUMINUM CHLORIDE	.5	2
C. SILVER	.10	1
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

S01,T23

RECEIVED
MAR 03 1997
Solid & Haz Waste

1996 Offsite Shipping Report

For wastes shipped offsite only.

TND 98-055-9702 YN - - Nashville

QUEBECOR PRINTING DICKSON INC
Attn: KEITH HOOD
PO BOX 686
DICKSON, TN 37056

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1536

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2. Waste Stream or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility EPA ID Number	Transporter EPA ID Number	TSDR Handling Codes
a. 3	Plating Sludge	F006	7852	1	PAD981038227	NJD054126164	S01, T21, T6
b. 3	Plating Sludge	F006	6123	3	PAD981038227	MOD095038998	S01, T21, T(
c. 5	Ink Sludge	D001	7750	2	ALD094476793	MID021087275	S01, T50, T1
d. 5	Ink Sludge	D001	9625	1	SCD044442333 (SCD044442333)	MID021087275	S01, T50, T1
e. 5	Ink Sludge	D001	36850	3	ALD981020894	ALD981020894	S01, T50, T1
f. 8	Parts Wash Solvent	D001	8833	8	TND981474125	ILD984908202	T63
g. 12	waste film Developer	D002	358	2	NYD045604964	NYD980769947	S01, T23
h. 12	waste film Developer	D002	623	3	NYD045604964	MOD095038998	S01, T23
3. Totals: Sum the two columns to the right. Page totals: sum the following two columns			78014	23			
Final totals: sum all page totals on last page of report							

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Joe Wortleman Vice President General Mgr 2/27/97

CN 0779 (Rev. 11/94) RDA 2203

DSWM 6.C

DIVISION OF SOLID WASTE MANAGEMENT
INSPECTION & COMPLIANCE SHEET

( ) INSPECTION CONDUCTED WITH EPA

RCRIS | INSP SEQ | OFFICE USE

FIELD OFFICE	NOTIFY STATUS	INSP STATUS
( )00 CENTRAL	(X) LQG	(X) LQG
01 JACK	( ) SQG	( ) SQG
2 NASH	( ) CESQG	( ) CESQG
( )03 KNOX	( ) NON GEN	( ) NON GEN
( )04 CITY	( ) TRANSPORTR	( ) TRANSPORTR
( )05 CHATT	( ) TSDR-INTERIM	( ) TSDR-INTERIM
( )08 MEMP	( ) TSDR-PERMIT	( ) TSDR-PERMIT
( )12 COOK	( ) GW ( ) NNF	( ) GW ( ) NNF

EPA INSTALLATION ID NUMBER: TND98-055-9702

PAGE # OF

FACILITY OR SITE: Quebecor Printing Dickson

ADDRESS: P.O. Box 686 / 1665 Old Columbia Rd.

CITY: Dickson

STATE: TN

ZIP: 37055

SUBMITTED BY: Tom Yates

STAFF ID#: 050

DATE SUBMITTED: 11-5-97

	EVALUATION DATE			
FULL CHECKLIST CEI 4	(X) CHECK IF KD 10-30-97	(X) 401 FULL GENERATOR - LCG ( ) 402 SMALL GENERATOR ( ) 403 TRANSPORTER	( ) 404 TSDR w/GRNDWTR ( ) 405 TSDR NO GNDWATER ( ) 406 TSDR w/ CME	( ) 407 TSDR w/ O & M ( ) 408 LDR ( ) 409 NNF
PARTIAL CKLST OTH 5	( ) CHECK IF KD	( ) 501 WALK THROUGH ( ) 502 CLOSURE EVAL ( ) 503 POST CLOSURE	( ) 504 SPEC WASTE ( ) 505 COMPLAINT FOL UP ( ) 506 EMER RESPONSE	( ) 507 OTHER ( ) 508 BIF ( ) 509 INCINERATOR ( ) 510 COC/ TRIAL BURN
SAMPLING SPL 6	( ) CHECK IF KD	( ) 601 GENERATED WASTE ( ) 602 RECEIVED WASTE ( ) 603 SOIL/SEDIMENT	( ) 604 SURFACE WATER / LEACHATE ( ) 605 GROUNDWATER ( ) 606 AMBIENT AIR	# SAMPLES ____
RECORDS NRR 7 OR FRR	( ) CHECK IF KD	( ) 701 CLOSURE PLANS /COSTS ( ) 702 POST CLOSURE COSTS ( ) 703 FINANCIAL INSTR	( ) 704 OTHER TSDF PLANS ( ) 705 REPTS FROM MANFSTS ( ) 706 MANIFEST RECORDS	( ) 707 GWM DATA ( ) 708 GWM PLANS ( ) 709 LATE ANNUAL REPORTS ( ) 710 OTHER
FOLLOW UPS CSE 8	( ) CHECK IF KD	( ) 801 FOLLOW UP BY WAY OF FIELD VISIT ( ) 802 FOLLOW UP BY WAY OF RECORD REVIEW		STAMP DATE RECEIVED HERE ▼▼
INCIDENT INC 9	( ) CHECK IF KD	( ) 901 COMPLAINT (ORAL) ( ) 902 COMPLAINT (WRITTEN)	( ) 903 EMERGENCY RESPONSE ( ) 904 OTHER	
MISC OTH 10	( ) CHECK IF KD	( ) 101 FACILITY STATUS EVAL MEETING/LETTERS ( ) 102 OTHER		

IF NOT SPECIFIED ELSEWHERE	KEY DATE		NOV DATE	NOV NUMBER		DATE REF TO ENFORCEMENT
KD	10-30-97	ND		1 2 3	RTE	

RCRIS # (Office Use)

No.	RULE CITED	ENGLISH ABBREVIATION	CLASS	COMPLIANCE DUE DATE	ACTUAL COMPLIANCE DATE
1	1200-1-11-		A B C R		
2	1200-1-11-		A B C R		
3	1200-1-11-		A B C R		
4	1200-1-11-		A B C R		
5	1200-1-11-		A B C R		
6	1200-1-11-		A B C R		
7	1200-1-11-		A B C R		
8	1200-1-11-		A B C R		

RECEIVED NOV 26 1997 Div. of Solid & Hazardous Waste

(X) NO VIOLATIONS

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE FIELD OPERATIONS
NASHVILLE ENVIRONMENTAL FIELD OFFICE
3000 MORGAN ROAD
JOELTON 37080

November 4, 1997

Ms. Donna Brown
Quebecor Printing Dickson Inc.
P.O. Box 686
Dickson, TN 37055

TND 98-055-9702

RE: HAZARDOUS WASTE INSPECTION
Tennessee Hazardous Waste Management Act

Dear Ms. Brown:

This letter confirms the observations and recommendations which were made during the Large Quantity Generator Inspection concerning your facility on October 30, 1997. The attached inspection report verifies that no violations were discovered during the inspection.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 299-9922.

Sincerely,

Tom Yates
Division of Solid Waste Management

TDY/QUE-182/ns

cc: DSWM-Central Office
U.S.E.P.A.-Region IV

HAZARDOUS WASTE INSPECTION REPORT

SITE/PHYSICAL LOCATION:

Quebecor Printing Dickson, Inc.
TND 98-055-9702
1665 Old Columbia Road
Dickson, TN 37055
Dickson County

PRIMARY CONTACT:

Donna Brown, Environmental Coordinator
P.O. Box 686
Dickson, TN 37055
(615) 446-6700

DATE/TIME OF INSPECTION:

October 30, 1997
approximately 8:15 a.m.

INSPECTION PARTICIPANTS:

Tom Yates ,Tennessee Department of Environment and Conservation, Division of Solid Waste Management, Nashville/Joelton Field Office
Donna Brown, Environmental Coordinator, Quebecor Printing Dickson, Inc.

REPORT PREPARED BY:

Tom Yates, Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Nashville Environmental Field Office
3000 Morgan Road
Joelton, TN 37080
Phone: (615) 299-9922
Fax: (615) 299-8749

PURPOSE OF INSPECTION:

This inspection was conducted to evaluate Quebecor Printing Dickson, Inc.'s compliance with the applicable requirements of the Rules and Regulations promulgate pursuant to the Hazardous Waste Management Act, T.C.A. 68-212-101 et. seq. and Hazardous Waste Reduction Act, T.C.A. 68-212-301 et. seq.

FACILITY DESCRIPTION:

Quebecor Printing Dickson begin operation in 1982 under different ownership. They employ approximately 412 people. Their business is printing newspaper supplements that are used in Sunday newspaper editions for many papers throughout the country. They generate over 1000 kg of hazardous waste in all months making them a large quantity hazardous waste generator.

The Standard Industrial Classification (SIC) codes used for their operation are 2754 and 2752.

INSPECTION FINDINGS:

The inspection consisted of a records review and evaluation and a facility inspection.

The facility inspection included the hazardous waste generation processes, satellite accumulation areas, less than 90 day accumulation area and hazardous waste recycling/recovery operations.

The printing of the Sunday newspaper supplements involves mainly the rotogravure printing process, but there is also some off-set printing done. Hazardous waste is generated from these printing operations, equipment cleaning operations, printing cylinder plating operations and wastewater treatment. The hazardous waste streams currently generated and reported are as follows:

Waste Stream #2 - Ink and solvent waste
EPA waste codes - F005, D001
Estimated monthly maximum generation - 14,000 kg
Major hazardous constituents - lactol solvents, toluene, xylene
Generation process - Washing with solvent, waste gravure ink and solvent that has lost its strength is pumped out of the ink fountains and becomes waste. Most of their ink/solvent is managed so the various colors are accumulated in separate drums, according to color, and re-used in the printing process.

A satellite container is located in the cylinder cleaning area for waste solvent generated from drum cylinder cleaning.

Waste Stream #3 - Plating sludge
EPA waste code - F006
Estimated monthly maximum generation - 6,397 kg
Major hazardous constituent -chromium
Generation process - Pretreatment of electroplating wastewaters. This sludge is processed in a filter press to reduce the water content and accumulated in reinforced, one cubic yard, bags designed for this type use. The bags are accumulated in the area near the filter press.

Waste Stream #5 - Ink sludge
EPA waste code - D001
Estimated monthly maximum generation - 5,900 kg
Major hazardous constituent - hydrocarbon solvents, resin & pigments
Generation process - Removal of settled ink solids from ink fountains. There are five painting lines with presses and associated equipment. A satellite container is located at each of the five lines.

Waste Stream #8 - Mineral spirits, parts wash solvent
EPA waste code - D001
Estimated monthly maximum generation - 77 kg
Major hazardous constituent - mineral spirits
Generation process - Five parts washer units are at various locations in the plant and used for parts cleaning activities until the solvent becomes to dirty to be effective and is replaced.

The less than 90-day accumulation area is located in a three sided shed like building near the support building. There were nineteen (19) drums of hazardous waste in the area at this inspection. Used oil containers are also accumulated there.

A solvent recovery system is located east of the support building.

Records and reports reviewed and evaluated at this inspection included annual reports, manifests, contingency plan, training records, inspection log and the waste reduction plan and progress report.

VIOLATIONS:

No violations were identified during this compliance evaluation.

REMARKS:

The drum used to accumulate used oil will be more in compliance and more appropriately marked if they are all marked "Used Oil" rather than waste oil.

Although the satellite containers had lids and tops and several only contained solids, it appeared that some of the tops or lids would not stay on if the container were tipped over. A careful check should be made to see that all hazardous waste containers are closed securely enough that that will stay closed if the container is tipped over.

When marking the accumulation date on the bags used for sludge accumulation it would be helpful if a pen or writing instructment could be used that would make clearer more durable writing.

It was noted that in addition to the phone which provides emergency communication for the less than 90 day accumulation area the workers in the area are provided walkie talkie units. However, it appeared, based on our discussion regarding its use, there were some problems. It could worthwhile to consider replacing these with 2-way radios other walkie talkie units which would be suitable, effective, and convenient to carry at all times.

It was understood the contingency plan is currently in the process of being updated. It would be a useful addition while updating this plan to include a plant drawing that would show the locations of all emergency equipment, hazardous waste accumulation areas as well as emergency evacuation routes.

I appreciate the time and cooperation I was given during the inspection. If there are any questions regarding this report, contact

SIGNED: Tom Yates DATE: 11-5-97

REVIEWED: [illegible] DATE: 11-4-97

cc: DSWM-Central Office
U.S.E.P.A., Region IV

FAX TRANSMITTAL MEMO

TO: MARK Q.

FAX NUMBER: 740-7105

FROM: BRIAN GANT

Solid Waste Management

SUBJECT: RYDER, DICKSON COUNTY

DATE: 5-23-01

NUMBER OF PAGES INCLUDING THIS ONE 13

IF YOU DO NOT RECEIVE THIS ENTIRE DOCUMENT OR HAVE ANY QUESTIONS CALL:

TELEPHONE NO: 532-0881

MESSAGE

69007601104

December 31, 2000

Mr. Brian Gant
Tennessee Department of Environment and Conservation
Division of Solid Waste Management
5th Floor, L&C Tower
401 Church Street
Nashville, Tennessee 37243

Re: Groundwater Monitoring Report, 1st Semi-Annual, 3rd Year Sampling Event
Former Ryder Truck Rental, Inc., Location Code 1254
199 Printwood Drive
Dickson, Dickson County, Tennessee

Dear Mr. Gant:

H_2O Environmental, Inc., on behalf of Ryder Truck Rental, Inc., is submitting a copy of the Groundwater Monitoring Report, First Semi-Annual, Third Year Sampling Event dated December, 2000 for the referenced facility.

Additionally, please send all future correspondences to:

Ms. Mary Lynn Douglas
Ryder
Environmental Services
1630 South Church Street, Ste. 301
Murfreesboro, Tennessee 37130

If you have any questions or require additional information, please feel free to contact me at (770) 798-9210 or Ms. Mary Lynn Douglas of Ryder at (615) 890-6229.

Sincerely,

H_2O ENVIRONMENTAL, INC.

Michael P. Harris, P.G.
Division Director

Enclosure

cc: Mary Lynn Douglas, Ryder (2)
Michael Lynott, Ryder
Kenneth von Kluck, Defrees & Fiske
Brian Yazemboski, Rollins Leasing Company

RECEIVED
DIV SOLID WASTE MGT
JAN 05 2001
Group No._____ File No._____
ID No._____

H_2O ENVIRONMENTAL, INC.
ASSESSMENT & REMEDIATION SPECIALISTS

5880 Live Oak Parkway, Suite 250 • Norcross, Georgia 30093 • 770•798•9210 • FAX 770•798•9220

GROUNDWATER MONITORING REPORT

(FIRST SEMI-ANNUAL, THIRD YEAR SAMPLING EVENT)

FORMER RYDER TRUCK RENTAL, INC.
LOCATION CODE 1254
199 PRINTWOOD DRIVE
DICKSON, DICKSON COUNTY, TENNESSEE

DECEMBER 2000

PREPARED FOR:

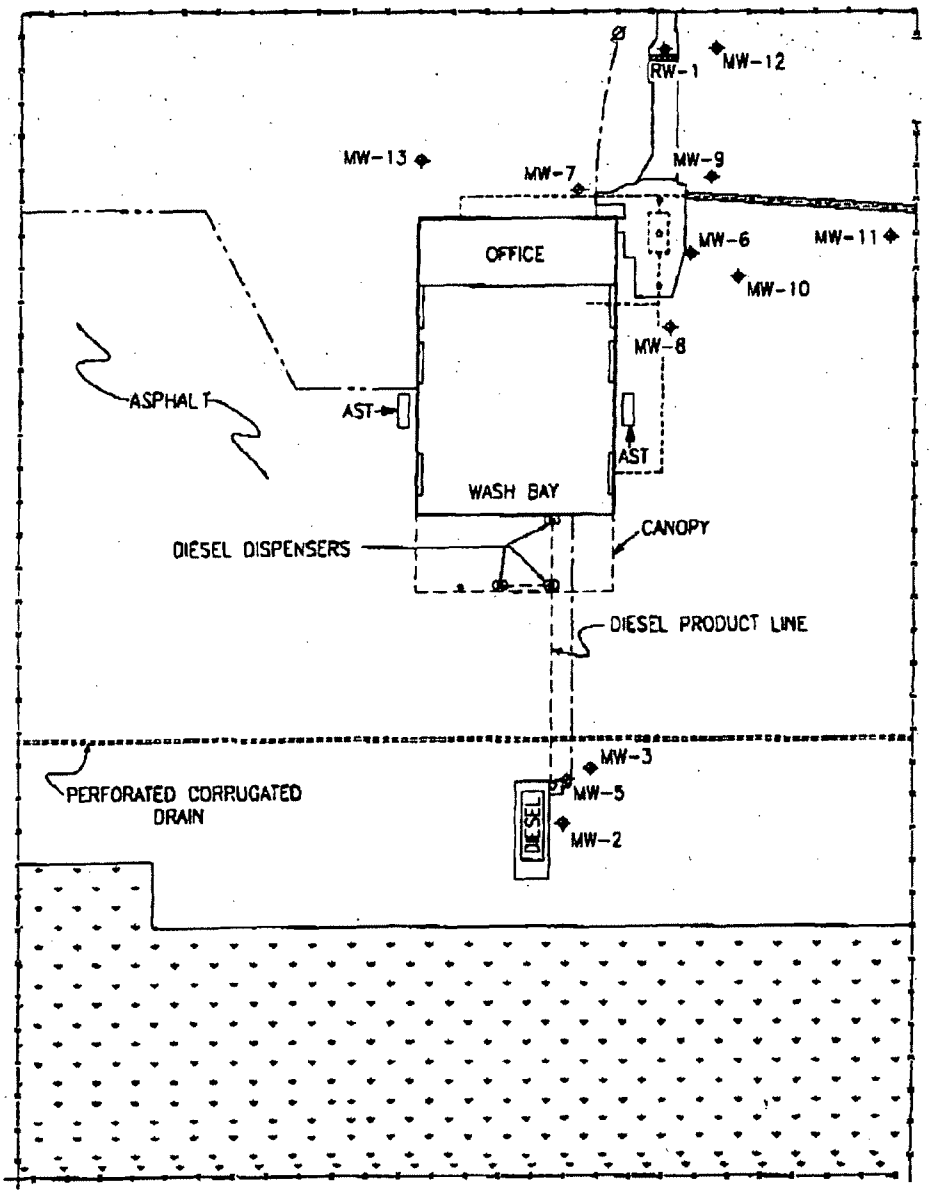
RYDER TRUCK RENTAL, INC.
1630 SOUTH CHURCH ST., STE. 301
MURFREESBORO, TENNESSEE 37130
(615) 890-6229

PREPARED BY:

H_2O ENVIRONMENTAL, INC.
5880 LIVE OAK PARKWAY, SUITE 250
NORCROSS, GEORGIA 30093
(770) 798-9210

PROJECT NO. RYD 1254

FIGURES



LEGEND

- MONITORING WELL
- UTILITY POLE
- UNDERGROUND ELECTRIC
- UNDERGROUND TELEPHONE
- UNDERGROUND GAS LINE
- SANITARY SEWER LINE

SCALE: 0 60 120

PREPARED FOR: RYDER TRUCK RENTAL

SITE ADDRESS: RYDER LC-1254
199 PRINTWOOD DRIVE
DICKSON, TENNESSEE

NORTH

DRAWN BY: A. SMITH

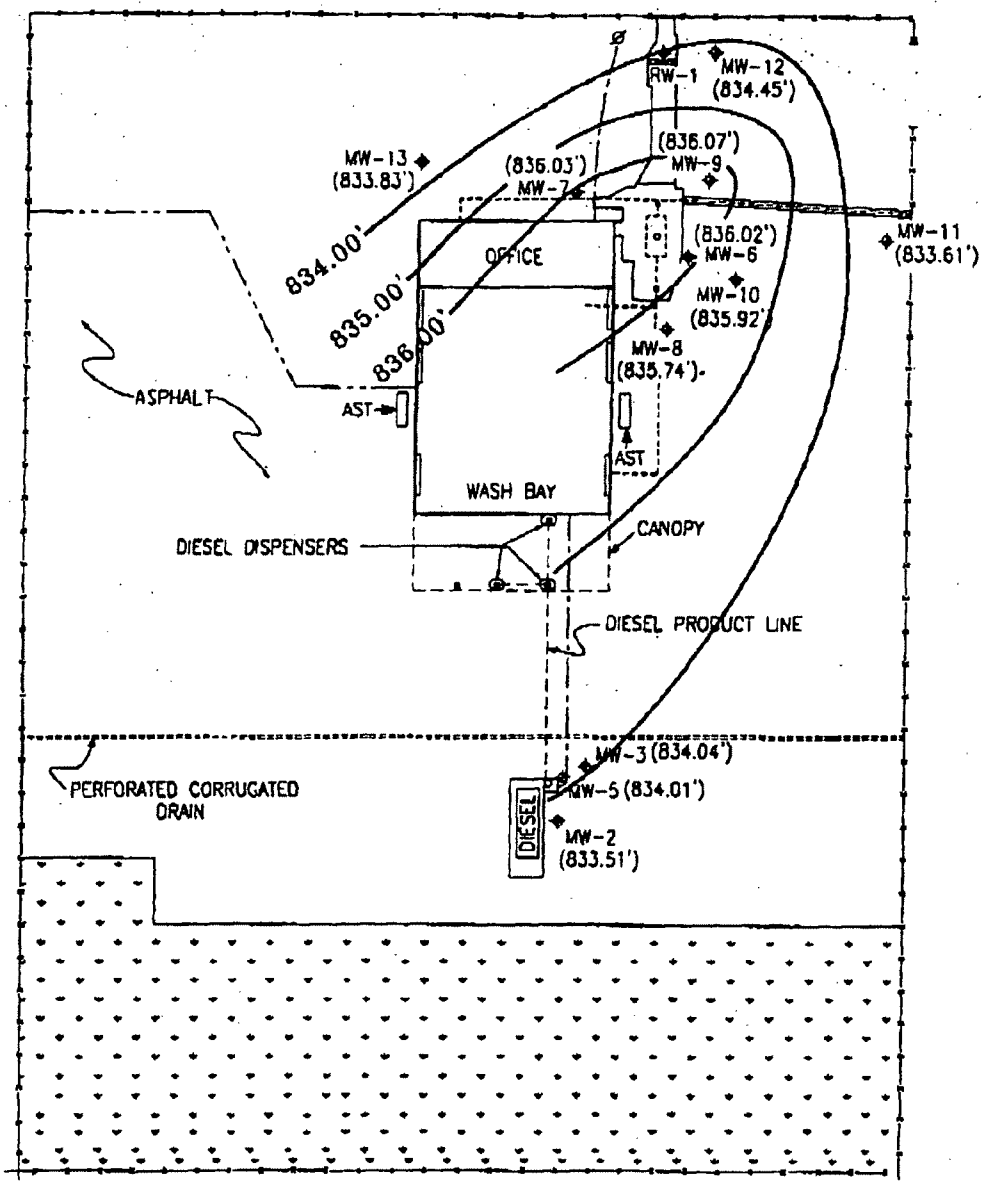
DATE DRAWN: 9/13/00

JOB NUMBER: RYD-1254

H_2O ENVIRONMENTAL, INC.
SCIENTISTS & ENGINEERS

FIGURE TITLE: SITE MAP

FIGURE NUMBER: 1



LEGEND

- MONITORING WELL
- UTILITY POLE
- UNDERGROUND ELECTRIC
- UNDERGROUND TELEPHONE
- UNDERGROUND GAS LINE
- SANITARY SEWER LINE
- 834.00' GROUNDWATER CONTOUR, feet
- (833.19') GROUNDWATER ELEVATION, feet

SCALE: 0 60 120

PREPARED FOR: RYDER TRUCK RENTAL

SITE ADDRESS: RYDER LC-1254
199 PRINTWOOD DRIVE
DICKSON, TENNESSEE

NORTH

DRAWN BY: A. SMITH

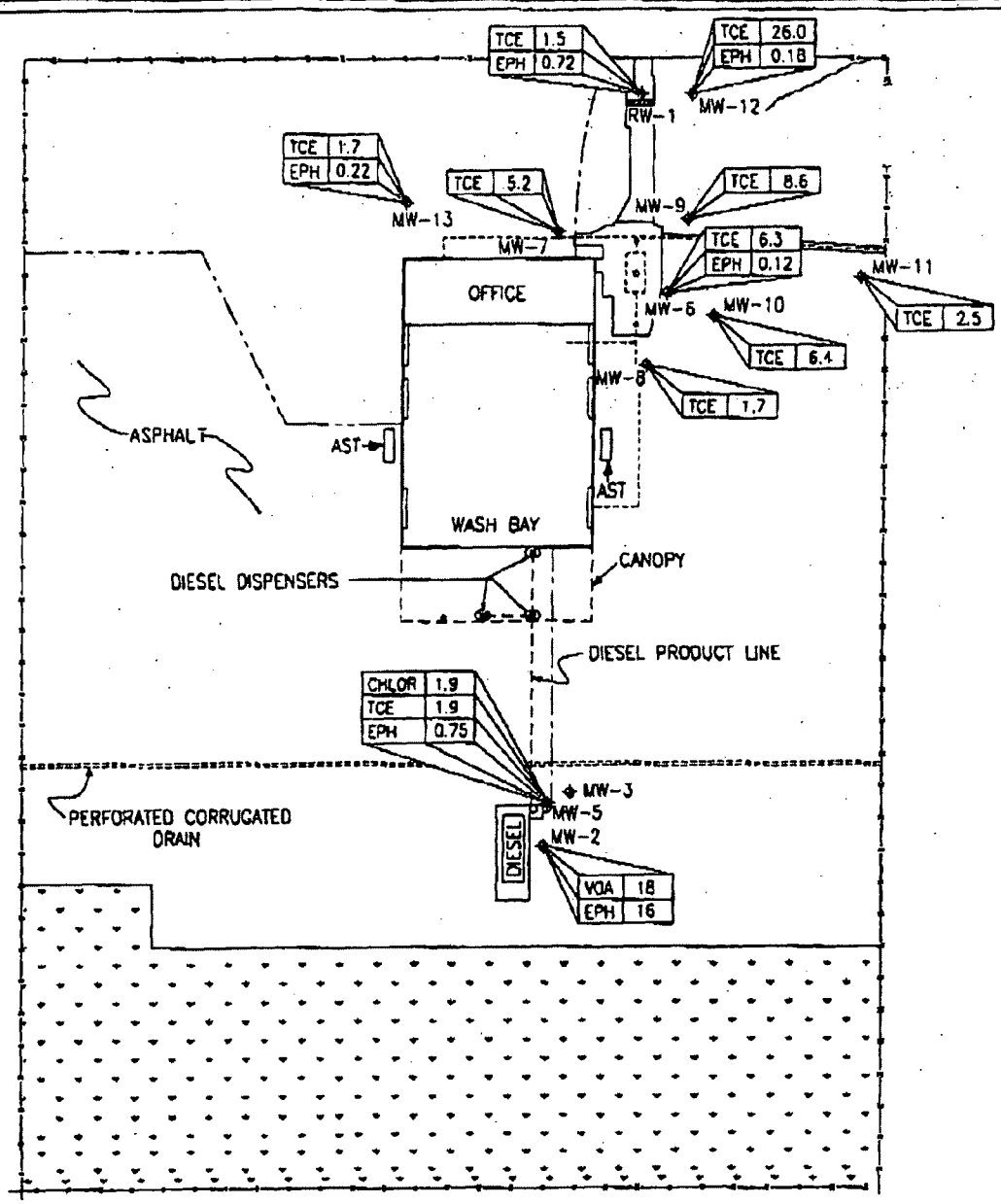
DATE DRAWN: 9/13/00

JOB NUMBER: RYD-1254

H_2O ENVIRONMENTAL, INC.
SCIENTISTS & ENGINEERS

FIGURE TITLE: POTENTIOMETRIC SURFACE MAP (August 1, 2000)

FIGURE NUMBER: 2



LEGEND

- MONITORING WELL
- UTILITY POLE
- UNDERGROUND ELECTRIC
- UNDERGROUND TELEPHONE
- UNDERGROUND GAS LINE
- SANITARY SEWER LINE

TCE – TRICHLOROETHENE, EPA Method 8010
CHLOR – CHLOROETHENE, EPA Method 8010
EPH – EXTRACTABLE PETROLEUM HYDROCARBONS, TN Method, mg/L
VOA – SUM OF VOLATILE ORGANIC AROMATICS, EPA Method 8020

NOTES: ALL CONCENTRATIONS IN ug/L UNLESS NOTED.
ONLY DETECTED CONSTITUENTS ARE SHOWN.

SCALE: 0 60 120

PREPARED FOR: RYDER TRUCK RENTAL

SITE ADDRESS: RYDER TRUCK RENTAL
RYDER LC-1254
199 PRINTWOOD DRIVE
DICKSON, TENNESSEE

NORTH

DRAWN BY: A. SMITH

DATE DRAWN: 9/13/00

JOB NUMBER: RYD-1254

H_2O ENVIRONMENTAL, INC.
SCIENTISTS & ENGINEERS

FIGURE TITLE: GROUNDWATER ANALYTICAL RESULTS (August 1, 2000)

FIGURE NUMBER: 3

TABLES

TABLE 1

SUMMARY OF POTENTIOMETRIC SURFACE DATA

Ryder Transportation Services (LC-1254)
199 Printwood Drive, Dickson, TN

Well No.	MW-2	MW-3	MW-5	MW-6	MW-7	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13	RW-1
Well Depth	12.0'	12.0'	12.0'	12.0'	12.0'	12.0'	12.0'	12.0'	12.0'	12.0'	12.0'	6.0'
TOC Elev.	837.87	837.72	837.72	838.45	838.67	838.68	838.11	837.97	835.50	836.50	837.29	

DATE	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV	DTW	ELEV
28-May-97	1.38	836.49	1.52	836.20																				
22-Jul-97	1.82	836.05	1.83	835.89	2.86	834.86	1.98	836.47																
5-Nov-97	4.49	833.38	3.81	833.91	3.67	834.05	2.77	835.68	2.94	835.73	3.25	835.43	2.24	835.87	2.34	835.63								
23-Dec-97	3.46	834.41	2.78	834.94	2.53	835.09	1.74	836.71	1.72	836.95	2.13	836.55	1.33	836.78	1.45	836.52	1.45	834.05	7.16	829.34	9.96	827.33		
14-Feb-98	0.55	837.32	1.16	836.56	1.05	836.67	1.98	836.47	1.57	837.10	2.11	836.57	1.41	836.70	1.57	836.40	1.31	834.19	1.41	835.09	1.93	835.36		
21-May-98	1.45	836.42	1.70	836.02	1.58	836.14	1.95	836.50	1.61	837.06	2.11	836.57	1.45	836.66	1.54	836.43	1.33	834.17	1.43	835.07	1.83	835.46	1.33	
28-May-98	1.36	836.51	1.63	836.09	1.53	836.19	1.99	836.46	1.67	837.00	2.11	836.57	1.45	836.66	1.62	836.35	1.44	834.06	1.40	835.10	1.86	835.43	1.27	
23-Sep-98	5.08	832.79	4.26	833.46	4.18	833.54	2.58	835.87	2.89	835.78	3.19	835.49	2.31	835.80	2.21	835.76	1.96	833.54	2.17	834.33	2.62	834.67	1.85	
13-Jan-99	0.64	837.23	1.23	836.49	1.01	836.71	1.57	836.88	1.82	837.05	2.11	836.57	1.52	836.59	1.96	836.01	1.45	834.05	1.48	835.02	1.81	835.48	1.45	
23-Mar-99	0.80	837.07	1.10	836.62	1.32	836.40	1.96	836.49	1.62	837.05	2.08	836.60	1.53	836.58	1.55	836.42	1.37	834.13	1.53	834.97	1.60	835.69	1.47	
11-Aug-99	5.13	832.74	4.41	833.31	4.41	833.31	3.13	835.32	3.45	835.22	3.62	835.06	2.75	835.36	2.71	835.26	2.32	833.18	2.72	833.78	4.50	832.79	5.42	
10-Feb-00	4.68	833.19	4.04	833.68	4.06	833.66	2.94	835.51	3.29	835.38	3.43	835.25	2.56	835.55	2.51	835.46	1.93	833.57	2.52	833.98	3.84	833.45	5.38	
1-Aug-00	4.36	833.51	3.68	834.04	3.71	834.01	2.43	836.02	2.64	836.03	2.94	835.74	2.04	836.07	2.05	835.92	1.89	833.81	2.05	834.45	3.46	833.83	1.72	

All measurements in units of feet.
TOC-Top of Casing.
DTW-Depth to Water.
Elev-Corrected Groundwater Elevation.

TABLE 2
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS
(Detected Compounds)

Ryder Transportation Services (LC-1254)
199 Printwood Drive, Dickson, TN

Well ID	Date	Benzene	Toluene	Ethyl-benzene	Total Xylene	Total VOA	Chloro-ethane	Tri-chloro-ethene	Chloro-form	Bromo-methane	Chloro-methane	Bromo-dichloro-methane	Tetra-chloro-ethane	Total VOH	GRO	DRO	TN-EPH
TDEC Guidance		5	1,000	700	7,000	–	–	5	6.0	50	–	50	5	–	1	1	1
MW-2	5/28/97	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.14	NA
	7/22/97	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND	NA
	12/23/97	NA	NA	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	5/28/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	0.32
	9/23/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	0.13
	1/13/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA	ND
	8/12/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	8/1/00	ND	ND	ND	18	18	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	16
MW-3	5/28/97	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.18	NA
	7/22/97	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.15	NA
	5/28/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/12/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	8/1/00	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
MW-5	7/22/97	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.37	NA
	5/28/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	0.47
	1/13/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/12/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	0.21
	2/10/00	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	0.57
	8/1/00	ND	ND	ND	ND	ND	1.9	ND	ND	ND	ND	ND	ND	1.9	NA	NA	0.75
MW-6	7/22/97	NA	NA	NA	NA	ND	ND	4.9	ND	NA	NA	NA	ND	ND	NA	ND	NA
	11/5/97	NA	NA	NA	NA	ND	ND	5.4	ND	ND	ND	ND	ND	5.4	NA	NA	NA
	5/29/98	ND	ND	ND	ND	ND	ND	5.3	ND	ND	ND	ND	ND	5.3	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	4.5	ND	ND	ND	ND	ND	4.5	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	5.3	ND	ND	ND	ND	ND	5.3	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	3.9	ND	ND	ND	ND	0.5	4.4	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/12/99	ND	ND	ND	ND	ND	ND	5.5	ND	ND	ND	ND	ND	5.5	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	3.6	ND	ND	ND	ND	ND	3.6	NA	NA	ND
	8/1/00	ND	ND	ND	ND	ND	ND	6.3	ND	ND	ND	ND	ND	6.3	NA	NA	0.12

E-63

TABLE 2
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS
(Detected Compounds)

Ryder Transportation Services (LC-1254)
199 Printwood Drive, Dickson, TN

Well ID	Date	Benzene	Toluene	Ethyl-benzene	Total Xylene	Total VOA	Chloro-ethane	Tri-chloro-ethene	Chloro-form	Bromo-methane	Chloro-methane	Bromo-dichloro-methane	Tetra-chloro-ethene	Total VOH	GRO	DRO	TN-EPH
TDEC Guidance		5	1,000	700	7,000	–	–	5	6.0	50	–	50	6	–	1	1	1
MW-7	11/5/97	NA	NA	NA	NA	ND	ND	6.5	ND	ND	ND	ND	ND	6.5	NA	NA	NA
	5/29/98	ND	ND	ND	ND	ND	ND	2.5	ND	ND	ND	ND	ND	2.5	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	1.4	ND	ND	ND	ND	ND	1.4	NA	NA	0.41
	1/13/99	ND	ND	ND	ND	ND	ND	1.7	ND	ND	ND	ND	ND	1.7	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	2.2	ND	ND	ND	ND	0.5	2.7	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/13/99	ND	ND	ND	ND	ND	ND	3.8	ND	ND	ND	ND	ND	3.8	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	5.3	ND	ND	ND	ND	ND	5.3	NA	NA	ND
	8/1/00	ND	ND	ND	ND	ND	ND	5.2	ND	ND	ND	ND	ND	5.2	NA	NA	ND
MW-8	11/5/97	NA	NA	NA	NA	ND	ND	4.0	ND	ND	ND	ND	ND	4.0	NA	NA	NA
	5/28/98	ND	ND	ND	ND	ND	ND	2.9	ND	ND	ND	ND	ND	2.9	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	2.0	ND	ND	ND	ND	ND	2.0	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	2.1	ND	ND	ND	ND	ND	2.1	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/12/99	ND	ND	ND	ND	ND	ND	1.5	ND	ND	ND	ND	ND	1.5	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	2.3	ND	ND	1.4	ND	ND	3.7	NA	NA	ND
	8/1/00	ND	ND	ND	ND	ND	ND	1.7	ND	ND	ND	ND	ND	1.7	NA	NA	ND
MW-9	11/5/97	NA	NA	NA	NA	ND	ND	4.3	ND	ND	ND	ND	ND	4.3	NA	NA	NA
	5/29/98	ND	ND	ND	ND	ND	ND	6.5	ND	ND	ND	ND	ND	6.5	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	3.5	ND	ND	ND	ND	ND	3.5	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	5.0	ND	ND	ND	ND	ND	5.0	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/13/99	ND	ND	ND	ND	ND	ND	5.6	ND	ND	ND	ND	ND	5.6	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	6.5	ND	ND	ND	ND	ND	5.5	NA	NA	ND
	8/1/00	ND	ND	ND	ND	ND	ND	8.6	ND	ND	ND	ND	ND	8.6	NA	NA	ND
MW-10	11/5/97	NA	NA	NA	NA	ND	ND	3.8	1.0	ND	ND	ND	ND	4.8	ND	0.27	NA
	5/28/98	ND	ND	ND	ND	ND	ND	5.3	ND	ND	ND	ND	ND	5.3	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	4.4	ND	ND	ND	ND	ND	4.4	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	4.2	ND	ND	ND	ND	ND	4.2	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/12/99	ND	ND	ND	ND	ND	ND	4.7	ND	ND	ND	ND	ND	4.7	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	7.3	ND	ND	ND	ND	ND	7.3	NA	NA	ND
	8/1/00	ND	ND	ND	ND	ND	ND	6.4	ND	ND	ND	ND	ND	6.4	NA	NA	ND

TABLE 2
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS
(Detected Compounds)

Ryder Transportation Services (LC-1254)
199 Printwood Drive, Dickson, TN

Well ID	Date	Benzene	Toluene	Ethyl-benzene	Total Xylene	Total VOA	Chloro-ethane	Tri-chloro-ethene	Chloro-form	Bromo-methane	Chloro-methane	Bromo-dichloro-methane	Tetra-chloro-ethene	Total VOH	GRO	DRO	TN-EPH
TDEC Guidance		5	1,000	700	7,000	–	–	5	6.0	50	–	50	5	–	1	1	1
MW-11	12/23/97	NA	NA	NA	NA	ND	ND	1.4	ND	ND	ND	ND	ND	1.4	NA	NA	NA
	5/28/98	ND	ND	ND	ND	ND	ND	2.9	ND	ND	ND	ND	ND	2.9	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	1.9	ND	ND	ND	ND	ND	1.9	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	2.9	ND	ND	ND	ND	ND	2.9	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.16
	8/13/99	ND	ND	ND	ND	ND	ND	2.2	ND	ND	ND	ND	ND	2.2	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	2.8	ND	1.2	ND	ND	ND	4	NA	NA	ND
	8/1/00	ND	ND	ND	ND	ND	ND	2.5	ND	ND	ND	ND	ND	2.5	NA	NA	ND
MW-12	12/23/97	NA	NA	NA	NA	ND	ND	3.8	2.4	ND	ND	ND	ND	6.2	NA	NA	NA
	5/28/98	ND	ND	ND	ND	ND	ND	8.5	ND	ND	ND	ND	ND	8.5	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	5.5	ND	ND	ND	ND	ND	5.5	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	11	ND	ND	ND	ND	ND	11	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/13/99	ND	ND	ND	ND	ND	ND	18	ND	1.3	ND	ND	ND	19.3	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	13	ND	ND	ND	ND	ND	13	NA	NA	0.25
	8/1/00	ND	ND	ND	ND	ND	ND	26	ND	ND	ND	ND	ND	26	NA	NA	0.18
MW-13	12/23/97	NA	NA	NA	NA	ND	ND	ND	6.3	1.2	ND	1.2	ND	8.7	NA	NA	NA
	5/28/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/13/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	2/10/00	ND	ND	ND	ND	ND	ND	1.8	ND	ND	ND	ND	ND	1.8	NA	NA	ND
	8/1/00	ND	ND	ND	ND	ND	ND	1.7	ND	ND	ND	ND	ND	1.7	NA	NA	0.22
MW-14*	5/29/98	ND	ND	ND	ND	ND	ND	2.6	ND	ND	ND	ND	ND	2.6	NA	NA	ND
	9/23/98	ND	ND	ND	ND	ND	ND	1.7	ND	ND	ND	ND	ND	1.7	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	1.8	ND	ND	ND	ND	ND	1.8	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/13/99	ND	ND	ND	ND	ND	ND	3.9	ND	ND	ND	ND	ND	3.9	NA	NA	ND
	2/10/99	ND	ND	ND	ND	ND	ND	5.1	ND	ND	ND	ND	ND	5.1	NA	NA	ND
	8/1/00	ND	ND	ND	ND	ND	ND	5.1	ND	ND	ND	ND	ND	5.1	NA	NA	ND
RW-1	2/14/98	ND	1.3	1.8	7.3	10.4	ND	ND	2.1	ND	ND	ND	0.6	2.7	ND	1.4	NA
	5/28/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	0.44
	9/23/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	1.3
	1/13/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	8/13/99	ND	ND	ND	ND	ND	ND	1.7	ND	ND	ND	ND	ND	1.7	NA	NA	0.34
	2/16/00	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	ND	ND	ND	NA	NA	1.3
	8/1/00	ND	ND	ND	ND	ND	ND	1.5	ND	ND	ND	ND	ND	1.5	NA	NA	0.72

TABLE 2
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS
(Detected Compounds)

Ryder Transportation Services (LC-1254)
199 Printwood Drive, Dickson, TN

Well ID	Date	Benzene	Toluene	Ethyl-benzene	Total Xylene	Total VOA	Chloro-ethane	Tri-chloro-ethane	Chloro-form	Bromo-methane	Chloro-methane	Bromo-dichloro-methane	Tetra-chloro-ethene	Total VOH	GRO	DRO	TN-EPH
TDEC Guidance		5	1,000	700	7,000	–	–	5	6.0	50	–	50	5	–	1	1	1
Equip.	5/29/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
Rinsate	9/23/98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	1/13/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	3/23/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	NA
	4/16/99	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND
	7/21/99	ND	ND	ND	ND	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	8/13/99	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.3	NA	NA	ND
	1/26/00	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND
	2/11/00	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	0.22
	8/1/00	ND	2.7	ND	ND	2.7	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA	ND

All data in units of ppb (ug/L), except GRO, DRO and TN-EPH which are in ppm (mg/L).

Total VOA - Sum of Volatile Organic Aromatics (benzene, toluene, ethylbenzene, and xylenes); analyzed by EPA Method 8020.

Total VOH - Sum of Volatile Organic Halogens, analyzed by EPA Method 8010 or 8260.

GRO (Gasoline Range Organics) and DRO (Diesel Range Organics) analyzed by State of Tennessee method.

Monitoring wells MW-1 and MW-4 were destroyed during remediation activities; Monitoring well MW-5 is a replacement for MW-1.

N-EPH - Extractable Petroleum Hydrocarbons, analyzed by Tennessee EPH by GC/FID.

ND - Not Detected, NA - Not Analyzed

* MW-14 is the duplicate sample collected from MW-7.

SRP

RYDER SYSTEMS
SRS-0252
Dickson, Tn
Brian Gant

9-9-97 Ryder Systems submitted an Env. Assessment conducted as part of an attempt to sell the property.

10-10-97 WEC sent a letter to Mary Lynn Douglas requesting that further action was required. The area of concern is near the Oil/Water separator where TCE was found in the groundwater. A report is due back to the Division by 11-25-97.

11-3-97 AAH spoke with Consultant and advised that a Workplan should be submitted prior to beginning work. State advised that a down gradient deep well would be necessary since DNAPLs were involved (in order to test the deeper aquifer).

11-4-97 Workplan received

12-1-97 Assessment of the Oil/water separator was received by the state. Four GW samples taken around the separator were hot with TCE. Further delineation must be performed.

12-5-97 WEC spoke with Michael Harris of H2O and discussed the proposal for delineation. Three new GW wells will be installed which will further delineate the TCE contamination around the Oil/water separator. The oil/water separator will be removed and confirmatory samples will be taken in the surrounding soils. These samples may provide clues to the source of TCE contamination which is yet unknown. They also may help with GW flow direction which is still not known. Michael Harris will contact WEC before the next step of delineation so that he can make a site visit at that time.

12-23-97 WEC made a site visit and met with Andrea Smith. I saw the newly installed monitoring wells. Analytical results should be submitted before February 1, 1998.

1-22-98 Oil-Water Separator Investigation Report received by the State. It is the suspected source of the TCE and will be removed. Further Lateral delineation of the contaminant plume may be required

1-20-98 WEC made a site visit and met Michael Harris and observed the removal of the Separator. It appeared that this was the source and that further delineation of soil contamination would be required.

4-20-98 State received a Corrective action report dated April 15, 1998. The source area of TCE was identified and removed. And a monitoring only status was proposed.

5-19-98 WEC spoke with Michael Harris and Mary Lynn Doulglas and agreed that a quarterly gw monitoring would be implemented. After a year, all data will be evaluated and a semi-annual monitoring will be considered. If contaminates show increasing levels, then the addition of more monitoring wells may be considered. WEC sent a letter expressing this to Mary Lynn with a copy to Michael Harris.

8-4-98 State received gw monitoring report from the 1st quarter sampling of 1998. Next monitoring event should be scheduled sometime in Nov. 1998.

1-27-99 State received gw monitoring report for the 2nd quarter sampling of 1998.

4-16-99 SRP received gw monitoring report for the 3rd quarter sampling.

6-28-99 received the 4th quarter gw monitoring report. Ryder requests to go to semi-annual monitoring. Since the levels in most monitoring wells have dropped to non-detect and historical data shows an overall decrease the SRP will allow the request.

7-8-99 BKG sent a letter approving of the request to move to semi-annual monitoring.

11-18-99 received the 1st semi-annual gw monitoring report. MW-6, MW-9 and MW-12 are the only wells that are exhibiting levels above guidance. These levels are near guidance levels and would appear to be asymtotic. If the levels remain constant or decrease in the 2nd semi-annual monitoring event then closure will granted on this issue.

add MW-10

6-12-00 received the Groundwater Monitoring Report. Trichloroethylene levels remained constant in some wells and rose slightly in others. Will require continued semiannual monitoring for a period of one more year, at which time the levels will be evaluated in order to determine if site closure is possible.

6-27-00 sent letter to consultant stating that we will require one additional year of semiannual gw monitoring at which time we will consider site closure if applicable.

1-5-01 received the gw monitoring report, 1st semi-annual. It appears that the current site occupant, Rollins, had a release of diesel fuel in May of last year resulting in detectable quantities of EPH in three mw's that typically do not have them present. Ryder is requesting that they be given immunity from the three effected wells and that they be the resposibilty of Rollins. The SRP will contact Rollins in order to establish them as the responsible party for the release and subsequent remediation. I will also contact Ryder and require the installation of a deep well and to submit data showing the radius of influence for the treatment system.

Quarles, Mark

From: Ashley Holt [aholt2@mail.state.tn.us]
nt: Tuesday, May 22, 2001 7:58 AM
: QuarleM@ttemi.com
Subject: RE: FW: Dickson County Request for File Information

RYDER SYSTEMS.doc

Mark,

The only other site we have is one that is currently active in our Program, and I am forwarding you the information we have on it. One other closed site in Dickson County that was in our Program involved a small diesel release from an old ust, but I don't think it would be anything that you are interested in. All the confirmatory samples came up below mcls.

Ashley A. Holt, Manager
State Remediation Program
Division of Solid Waste Management

Phone: 615-532-0853
Fax: 615-532-0886
E-mail: aholt2@mail.state.tn.us

>>> "Quarles, Mark" <QuarleM@ttemi.com> 05/21/01 11:00AM >>>
Thanks. Is this the ONLY site in Dickson County for which you have a ecord?

Mark Quarles
595-5486 work

-----Original Message-----
From: Ashley Holt [mailto:aholt2@mail.state.tn.us]
Sent: Monday, May 21, 2001 11:00 AM
To: QuarleM@ttemi.com
Subject: Re: FW: Dickson County Request for File Information

Mark,

Here is the available information on the Wabash Alloys site. If I can be of
further assistance, please call.

Ashley A. Holt, Manager
State Remediation Program
Division of Solid Waste Management

Phone: 615-532-0853
Fax: 615-532-0886
E-mail: aholt2@mail.state.tn.us

>>> "Quarles, Mark" <QuarleM@ttemi.com> 05/21/01 10:19AM >>>
Ashley, please review this attached table and let us know what sites have
been regulated, either current or past, by the State Remediation gram.
Also, we need to know if there other sites not shown on the table. Please

respond as soon as you get a chance. Thanks a bunch!

Mark Quarles

-----Original Message-----
From: Quarles, Mark
Sent: Wednesday, May 09, 2001 11:52 AM
> To: 'Cdarden@mail.state.tn.us'
> Cc: Vick, Scott; Thompson, Robert
> Subject: Dickson County Request for File Information
>
> Chris,
>
> We are performing an assessment for the US EPA for the City Dickson /
> Dickson County area. The Scope of Work requires that we investigate
the
> regulatory status of sites that are known to be on RCRIS, CERCLIS, or
> other regulatory-specific lists. I have prepared a table (attached
Word
> document) that lists each of the sites that were produced during the
EPA
> database reviews. These sites are ALL in Dickson County. We are only
> concerned with those sites in DICKSON COUNTY. We ask that you review
this
> list and inform us as to the presence or absence of any Division of
Solid
> Waste Management regulatory file for each of the sites / owners that
are
> listed.
>
> You can respond by either email, telephone, or fax - whichever is more
> convenient for you. We ask that, if possible, we get a determination
by
> Tuesday, May 15.

Thanks in advance for your time.
>
> Mark Quarles
> 615-595-5486 work
> 615-790-7105 fax
> quarlem@ttemi.com
>
> attached document - table of sites.
>
> <<RCRISCERCLISTRISFacilities.doc>>

Quarles, Mark

From: Ashley Holt [aholt2@mail.state.tn.us]
nt: Tuesday, May 22, 2001 10:57 AM
: QuarleM@ttemi.com
Subject: RE: FW: Dickson County Request for File Information

Mark,

The project manager for the Ryder site is Brian Grant, phone: 532-0881. He will be in the office tomorrow, and you can call and speak with him. I really don't know the specifics of the site the way Brian does. I am forwarding to you the limited info we have on the ust site. Since this site is closed and the project manager (Will Cochran) is no longer with the Division, the only way to get an address for this site is to call Pam Chavez and request that she do a file check . This site was closed in February, 1998 and has probably gone for micro-filming. Sorry I can't be of more help.

Ashley

>>> "Quarles, Mark" <QuarleM@ttemi.com> 05/22/01 09:10AM >>>
Ashley, I noticed on the Ryder summary that in June 2000, the TCE levels remained constant and that in January, they were required to install a deep
well and show the radius of influence of a treatment system. Has a treatment system been installed? Also, do you know if the wells are in bedrock or soil? Do you have a good summary geo / groundwater report for
the site that I can copy?

so, do you have any details on the Rollins release in May 2000?

Mark Quarles

-----Original Message-----
From: Ashley Holt [mailto:aholt2@mail.state.tn.us]
Sent: Tuesday, May 22, 2001 7:58 AM
To: QuarleM@ttemi.com
Subject: RE: FW: Dickson County Request for File Information

Mark,

The only other site we have is one that is currently active in our Program,
and I am forwarding you the information we have on it. One other closed site in Dickson County that was in our Program involved a small diesel release from an old ust, but I don't think it would be anything that you are
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Ashley A. Holt, Manager
State Remediation Program
Division of Solid Waste Management

Phone: 615-532-0853
Fax: 615-532-0886
E-mail: aholt2@mail.state.tn.us

> "Quarles, Mark" <QuarleM@ttemi.com> 05/21/01 11:00AM >>>
anks. Is this the ONLY site in Dickson County for which you have a record?

Mark Quarles
595-5486 work

-----Original Message-----
From: Ashley Holt [mailto:aholt2@mail.state.tn.us]
Sent: Monday, May 21, 2001 11:00 AM
To: QuarleM@ttemi.com
Subject: Re: FW: Dickson County Request for File Information

Mark,

Here is the available information on the Wabash Alloys site. If I can be of
further assistance, please call.

Ashley A. Holt, Manager
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Fax: 615-532-0886
E-mail: aholt2@mail.state.tn.us

>>> "Quarles, Mark" <QuarleM@ttemi.com> 05/21/01 10:19AM >>>
Ashley, please review this attached table and let us know what sites have
been regulated, either current or past, by the State Remediation Program.
Also, we need to know if there other sites not shown on the table. Please
respond as soon as you get a chance. Thanks a bunch!

Mark Quarles

-----Original Message-----
> From: Quarles, Mark
> Sent: Wednesday, May 09, 2001 11:52 AM
> To: 'Cdarden@mail.state.tn.us'
> Cc: Vick, Scott; Thompson, Robert
> Subject: Dickson County Request for File Information
>
> Chris,
>
> We are performing an assessment for the US EPA for the City Dickson /
> Dickson County area. The Scope of Work requires that we investigate the
> regulatory status of sites that are known to be on RCRIS, CERCLIS, or
> other regulatory-specific lists. I have prepared a table (attached Word
> document) that lists each of the sites that were produced during the EPA
> database reviews. These sites are ALL in Dickson County. We are only
> concerned with those sites in DICKSON COUNTY. We ask that you review this
> list and inform us as to the presence or absence of any Division of Solid
> Waste Management regulatory file for each of the sites / owners that are
> listed.
>
> You can respond by either email, telephone, or fax - whichever is more
> convenient for you. We ask that, if possible, we get a determination

Tuesday, May 15.
>
> Thanks in advance for your time.

>
> Mark Quarles
> 615-595-5486 work
> 615-790-7105 fax
> quarlem@ttemi.com

attached document - table of sites.
>
> <<RCRISCERCLISTRISFacilities.doc>>

SRP 5/22/01

Quarles, Mark

To: Ashley Holt
bject: RE: FW: Dickson County Request for File Information

Actually, we are interested in any known chemical release or unpermitted disposal. So, yes, we are interested in the small diesel UST site. Also, interesting enough, was the presence of TCE in the oil / water separator of Ryder. Please forward the street address of that site to me, as well as the address and site summary for the small UST.

As always, thanks alot for your help.

MArk Quarles
595-5486 work

-----Original Message-----
From: Ashley Holt [mailto:aholt2@mail.state.tn.us]
Sent: Tuesday, May 22, 2001 7:58 AM
To: QuarleM@ttemi.com
Subject: RE: FW: Dickson County Request for File Information

Mark,

The only other site we have is one that is currently active in our Program, and I am forwarding you the information we have on it. One other closed site in Dickson County that was in our Program involved a small diesel release from an old ust, but I don't think it would be anything that you are interested in. All the confirmatory samples came up below mcls.

.nley A. Holt, Manager
State Remediation Program
Division of Solid Waste Management

Phone: 615-532-0853
Fax: 615-532-0886
E-mail: aholt2@mail.state.tn.us

>>> "Quarles, Mark" <QuarleM@ttemi.com> 05/21/01 11:00AM >>>
Thanks. Is this the ONLY site in Dickson County for which you have a record?

Mark Quarles
595-5486 work

-----Original Message-----
From: Ashley Holt [mailto:aholt2@mail.state.tn.us]
Sent: Monday, May 21, 2001 11:00 AM
To: QuarleM@ttemi.com
Subject: Re: FW: Dickson County Request for File Information

Mark,

Here is the available information on the Wabash Alloys site. If I can be of
further assistance, please call.

hley A. Holt, Manager
ate Remediation Program
Division of Solid Waste Management

Phone: 615-532-0853
Fax: 615-532-0886
E-mail: aholt2@mail.state.tn.us

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SRP 5/22/01

Quarles, Mark

To: Ashley Holt
bject: RE: FW: Dickson County Request for File Information

Ashley, I noticed on the Ryder summary that in June 2000, the TCE levels remained constant and that in January, they were required to install a deep well and show the radius of influence of a treatment system. Has a treatment system been installed? Also, do you know if the wells are in bedrock or soil. Do you have a good summary geo / groundwater report for the site that I can copy?

Also, do you have any details on the Rollins release in May 2000?

Mark Quarles

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To: QuarleM@ttemi.com
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The only other site we have is one that is currently active in our Program, and I am forwarding you the information we have on it. One other closed site in Dickson County that was in our Program involved a small diesel release from an old ust, but I don't think it would be anything that you are interested in. All the confirmatory samples came up below mcls.

.hley A. Holt, Manager
State Remediation Program
Division of Solid Waste Management

Phone: 615-532-0853
Fax: 615-532-0886
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Division of Solid Waste Management

Phone: 615-532-0853
Fax: 615-532-0886
E-mail: aholt2@mail.state.tn.us

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> attached document - table of sites.
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> <<RCRISCERCLISTRISFacilities.doc>>

DSWM L&C

TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT
COMPLIANCE MONITORING AND ENFORCEMENT ACTIVITY REPORT

PH 2430
Rev. 9/85

1. ID NO: TND 069087666 Name: SAGE RACING TEAM

ADDRESS: Bell Wood Heights Dickson TN 37055

2. PROGRAM: Hazardous Waste (X) Solid Waste [ ]

3. KEY DATE: (MM-DD-YY) 07-16-86

TYPE OF EVALUATION

4. EVALUATION INSPECTION
07/16/86
(field visits)

A. FULL CHECKLIST
1. HW GEN [1]
2. HW TRANS [2]
3. HW TSDF [3]
4. HW SQ GEN [4]
5. HW NON-NOT [5]
5. SW PROCESSING FACILITY [6]
7. SW LANDFILL [7]
8. PART B INSPECTION [8]

B. OTHER
1. WALK-THROUGH INSP [1]
2. CLOSURE EVAL [2]
3. POST CLOSURE EVAL [3]
4. SPECIAL WASTE EVAL [4]
5. PART A MODIFICATION/WITHDRAWAL EVAL [5]
6. COMPLAINT FOLLOW-UP NOV [6]
7. EMERGENCY RESPONSE [7]
8. OTHER (describe in comments) [8]

5. SAMPLING INSPECTION ___/___/___
1. GENERATED WASTE [1]
2. RECEIVED WASTE [2]
3. SOIL/SEDIMENT [3]
4. SURFACE WATER/LEACHATE [4]
5. GROUND WATER [5]
6. AMBIENT AIR [6]
SAMPLES

6. SPECIAL INSPECTION ___/___/___
1. GROUNDWATER MONITORING [1]
2. OTHER (describe in comments) [2]
3. PRELIMINARY GEOLOGIC EVALUATION [3]
4. FINAL GEOLOGIC EVALUATION [4]

7. RECORDS/REPORT REVIEW ___/___/___
(non-permitting)
(in office)
1. CLOSURE PLANS WITH COST ESTIMATES [1]
2. POST CLOSURE PLANS WITH COST ESTIMATE [2]
3. FINANCIAL INSTRUMENTS [3]
4. OTHER REQUIRED PLANS [4]
5. SPECIAL WASTE REQUEST [5]
6. LANDFILL PLANNING ANNUAL REPORT [6]
7. MANIFEST REPORTS [7]
8. MANIFEST RECORDS [8]
9. GWM DATA [9]
10. GWM PLANS [10]
11. OTHER [11]

8. FOLLOW-UP EVALUATION ___/___/___
1. WITH FIELD OFFICE PERSONNEL ONLY [1]
2. WITH CENTRAL OFFICE PERSONNEL [2]
3. FIELD VISIT [3]
4. RECORD REVIEW [4]

9. INCIDENT PROCESSING ___/___/___
1. ORAL COMPLAINT [1]
2. WRITTEN COMPLAINT [2]
3. EMERGENCY RESPONSE CALL [3]
4. OTHER (describe in comments) [4]

10. MISCELLANEOUS ___/___/___
1. FACILITY STATUS EVALUATION MEETINGS/LETTERS [1]
2. OTHER (describe in comments) [2]
3. ABORTED INSPECTION [3]
4. WARNING LETTER [4]

11. VIOLATION CODES: NONE (X)

12. ENFORCEMENT ACTIONS:

	DATE ACTION TAKEN	SCHEDULED COMPLIANCE DATE	ACTUAL COMPLIANCE DATE
NOTICE OF VIOLATION	___/___/___	___/___/___	___/___/___
COMPLIANCE REVIEW MEETING	___/___/___	___/___/___	___/___/___
REFERRED TO ENFORCEMENT SECTION	___/___/___		

13. COMMENTS: (continue on reverse if necessary) LOCATED IN SUBDIVISON OFF HWY 70 ABOUT 1½ miles east of Dickson, Does not generate a hazardous waste

KEY OVER [ ]

14. PREPARED BY: D. WALL | ID CODE: 084 | DATE: 07-18-86 | FIELD OFFICE: Nashville 102

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full, legal name: Saltire Industrial, Inc			EPA identification code: TNR000001198
2. Mailing address: 800 Third Avenue, 24th Flor	City: New York	State: NY	Zip code: 10022
3 a. Site address: 201 Tennessee Drive	City: Dickson	State: TN	Zip code: 37055	County name: Dickson
b. Latitude (degrees, minutes & seconds): 36° 3' 30" 36.0330	Longitude (degrees, minutes & seconds): 87° 21' 20" 87.2120		
4. Owner name: Saltire Industrial, Inc		Type: P	Phone with area code: (212) 750-0200
5. Manager or operator name: (Not Active)		Type: P	Phone with area code: ( )
6. Principal technical contact: Nicholas B. Bauer			Phone with area code: (212) 508-7518
7. Number of employees: NA - Not Active	Year operation began: 1962	SIC codes (Primary SIC first, etc.): 2542	Job shop: Yes (No)

8. Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
a. Nicholas Bauer	9a.m.-6p.m.	703/653-0067 202/547-4542
b. Reid Dennis	24 hr	800-718-9124
c.		
d.		

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.

None (closed facility)

10. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ) No (X)

[redacted] certify that the information given in this document is true, accurate and complete by signing and dating.

[redacted]	[redacted]	[redacted]
Nicholas Bauer	V.P. Environmental Affairs	5/16/96

*** Below is for Department use only ***

12. Date received	County code	Priority	Generator	Small Generator	Special status
05-17-96	22		(Yes) No	Yes (No)	

13. Date closed	Date regulated	Date deregulated

14. Comments

CN-0809 (Rev. 12/94) RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

1. Organization's full name at facility: Saltire Industrial
EPA identification code: [illegible]

2. Waste name. Use standard name from regulations whenever possible.: Hazardous Waste Solid N.O.S. (Lead)
Waste Stream number: 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1996
Date no longer generated. (MM/DD/YY): 5/96 – 5/13/96
Frequency of generation: Continuous / Accidental/ One time / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).: (b)
EPA waste codes. (Primary first; six maximum.): D008, F006
SIC code for generating process.: 2542

5. Physical form: Solid (d)
% Solid: 100
% Water:
Vol. to wt. conversion (pounds/gallon): 14
If used for fuel, chlorine content (PPM): N/A
If used for fuel, BTU per pound: N/A

6. Generation rates. Supply all rates in kilograms.
Monthly maximum (kg): ~~0~~ 79,000
Annual average (kg): ~~10~~ 99,000 NKB 5/14/96
Maximum amount stored onsite (kg): ~~0~~
Maximum days stored: 90

7. DOT shipping name: Hazardous Waste Solid N.O.S. (Lead)
DOT hazard class: Class 9
PKG III
DOT ID code: NA3077

8. Describe generation process.

Demolition of Waste Water Treatment Plant that is no longer in use. Waste Water Treatment Plant was closed in 1988.

9. Chemical Characteristics.
pH: N/A
Flash point: N/A
Reactive code: N/A
Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )

Major and hazardous constituents. Give range of values at right.

	lower value	upper value
a. Dried Fool Sludge	5	10
b. Non-Friable Asbestos (transite)	70	90
c. Metal with Lead Paint	5	25
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

N/A

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

1. Organization's full name at facility: SALtire Industrial
EPA identification code: TNKCCCC1193

2. Waste name. Use standard name from regulations whenever possible.: Hazardous Waste Solid N.O.S (Lead)
Waste Stream number: 2

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1996
Date no longer generated. (MM/DD/YY): ~~5/96~~ 5/13/96
Frequency of generation: Continuous Accidental/ Various One time

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). (b)
EPA waste codes. (Primary first; six maximum.): D008
SIC code for generating process.: 2542

5. Physical form: Solid (9)
% Solid: 100
% Water:
Vol. to wt. conversion (pounds/gallon): 14
If used for fuel, chlorine content (PPM): N/A
BTU per pound: N/A

6. Generation rates. Supply all rates in kilograms.
Monthly maximum (kg): ~~0~~ 7,000
Annual average (kg): 99,000
Maximum amount stored onsite (kg): 0
Maximum days stored: 90

7. DOT shipping name: Hazardous Waste Solid N.O.S (Lead)
DOT hazard class: Class (9)
PG III
DOT ID code: NA3077

8. Describe generation process.

Demolition of Waste Water Treatment Plant that is no longer in use. WASTEWATER TREATMENT PLANT WAS CLOSED IN 1988.

9. Chemical Characteristics.
pH: N/A
Flash point: N/A
Reactive code: N/A
Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. Lead Contaminated Debris (which consists		100
b. of the following metal, Concrete, wood,		
c. Bricks, etc...)		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

N/A

DSWM L.C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, TN 37243-1535

May 20, 1996

Mr Nicholas B. Bauer
Saltire Industrial, Inc.
800 Third Avenue, 24th Floor
New York, NY 10022

Re: EPA ID Number
Site Location: 201 Tennsco Drive
Dickson, TN 37055

Dear Mr. Bauer:

This letter will serve as official notice of your EPA ID Number TNR 00-000-1198 which should be used on all reports and correspondence submitted to the Department.

The EPA ID Number is assigned to this specific physical location. Should you ever relocate, you would be required to apply for a new EPA ID Number for that location.

PLEASE NOTE: If you generate greater than 100 kilograms (220 pounds) in any month, you must file an Annual Report with the Division of Solid Waste Management and pay a Generator Fee by the following March 1.

If you have further questions about this subject please contact Dennis Woodson at (615) 532-0487.

Sincerely,

Bobby W. Morrison

Bobby W. Morrison, Manager
Waste Activity Audit
Division of Solid Waste Management

BWM/DBW/mb

cc: Nashville Field Office

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name	EPA identification code
SALTIRE INDUSTRIAL INC	TNR 00-000-1195

2. Mailing address	City	State	Zip code
800 THIRD AVENUE 24TH FLOOR	NEW YORK	NY	10022

3. a. Site address	City	State	Zip code	County name
201 TENNSCO DRIVE DICKSON TN 37055				Dickson

b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)
36.0330	87.2120

4. Owner name (may be corporation or company name)	Type	Phone with area code
SALTIRE INDUSTRIAL INC	P	(212) 750-0200

5. Manager or operator name	Type	Phone with area code
~~NOR (ACTIVE)~~ NONE (INACTIVE)		

6. Principal technical contact	FAX number with area code	Phone with area code
NICHOLAS B BAUER	703-391-7203	~~(212) 500-7518~~ 703-391-7202

7. Number of employees	Year operation began	SIC codes (Primary SIC first,etc.)	Job shop
0	1962	2542, , ,	Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	NICHOLAS BAUER	9AM-6PM	(703) ~~683-0007~~ 391-7202
b.	REID DENNIS	24 HR	(800) 718-9124
c.			
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No (X)

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Nicholas B Bauer	VP, Environmental Affairs	1/3/97

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
03-04-1997	22		Yes (No) ✓	Yes No N	

12. Date closed	TSDR status	Transporter status

13. Comments

RECEIVED
MAR 04 1997
Div. of Solid & Hazardous Waste

CN-0909 (Rev. 11/95) RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility SALTIRE INDUSTRIAL INC	EPA identification code TNR 00-000-1198
2. Waste name. Use standard name from regulations whenever possible. HAZARDOUS WASTE SOLID NOS (LEAD)	WASTE STREAM NUMBER 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation
1996	~~05-13-96~~ 05-17-96	ONE TIME Continuous Accidental/ One time Various (A)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.)	SIC code for generating process.
B	D008,F006	2542,

5. Physical form.code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Sld:Othr (9)	100		14.000	0.0	0.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
~~99,000.0~~ 58,600	~~99,000.0~~ 58,600	0.0	90

7. DOT shipping name	DOT hazard class	DOT ID code
HAZARDOUS WASTE SOLID NOS (LEAD)	Misc Haz. Mat	09 NA3077

8. Describe the generation process.

DEMOLITION OF WASTE WATER TREATMENT PLANT THAT IS NO LONGER IN USE. WASTE WATER TREATMENT PLANT WAS CLOSED IN 1988.

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( ) (V)

Hazardous constituents. Give range of values at right.	lower value	upper value
A. DRIED F006 SLUDGE (ppm total metals)	ND	11,000
B. NON-FRIABLE ASBESTOS (TRANSITE) (% asbestos)	15	25
C. METAL WITH LEAD PAINT (ppm lead)	ND	50,000
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

D81- Land fill

RECEIVED
MAR 04 1997
Div. of Solid & Hazardous Waste

8(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility SALTIRE INDUSTRIAL INC	EPA identification code THR 00-000-1198
2. Waste name. Use standard name from regulations whenever possible. HAZARDOUS WASTE SOLID NOS (LEAD)	WASTE STREAM NUMBER 2

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1996	Date no longer generated. (MM/DD/YY) ~~05-17-96~~ 5-17-96	Annual Frequency of generation ONE TIME Continuous Accidental/ Various One time (A)
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g) B	EPA waste codes. ~~(Primary first; six maximum.)~~ D008 ~~D008 e Non hazardous~~	SIC code for generating process. 2542,

5 Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Sld:Othr (9)	100		14.000	0.0	0.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
99,000.0	99,000.0	0.0	90

7. DOT shipping name	DOT hazard class	DOT ID code
~~HAZARDOUS~~ Hazardous WASTE SOLID NOS (LEAD)	Misc Haz. Mat	09 NA3077

8. ~~Describe~~ the generation process.

DEMOLITION OF WASTE WATER TREATMENT PLANT THAT IS NO LONGER IN USE. WASTE WATER TREATMENT PLANT WAS CLOSED IN 1988.

This waste stream was determined to be non-hazardous by TCLP and was managed as a non-hazardous solid waste and disposed of off site in a landfill. Thus, no hazardous lead-contaminated debris were generated.

9. Chemical Characteristics

pH	Flash point	Reactive code	~~Concentration units.~~ Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM (V)

Hazardous constituents. Give range of values at right.	lower value	upper value
A. LEAD CONTAMINATED DEBRIS (WHICH CONSISTS OF THE FOLLOWING	ND	<5
B. METAL, CONCRETE, WOOD, BRICKS, ETC...)		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste ***through final disposition***.
Use the Waste Management Method Codes on page 6 of the instructions.

D81- Landfill

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MAR 04 1997
Div. of Solid & Hazardous Waste

CN-0773 (Rev. 11/95) Form Continues on the Back

8(Y)

1996 Offsite Shipping Report

For wastes shipped offsite only.

Page 1 of 1

TNR 00-000-1198 VN - - Nashville

SALTIRE INDUSTRIAL INC
Attn: NICHOLAS B BAUER
800 THIRD AVENUE 24TH FLOOR
NEW YORK, NY 10022

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2. Waste Streams or "FS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDR/Destination Facility EPA ID Number	Transporter EPA ID Number	TSDR Handling Codes
a. 1	Hazardous Waste Solid NOS (Lead)	D008 F006	58,600	6	TND981922826	TND987778016	~~D81~~ S01
b. ~~2~~	~~Hazardous Waste Solid, NOS (Lead)~~	~~D008~~	~~0~~	~~0~~	~~NA~~	~~NA~~	—
c.							
d.							
e.							
f.							
g.							
h.							
3. Totals: Sum the two columns to the right. Page totals: sum the following two columns. Final totals: sum all page totals on last page of report			58,600	6			

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Nicholas B Bauer VP Environmental Affairs 2/24/97

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CN-(Rev. 11/94)

RDA 2203

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full legal name: SUMIDEN WIRE PRODUCTS CORPORATION
EPA identification code: TNR 00-000-1834

2. Mailing address: 710 MARSHALL STUART DR | City: DICKSON | State: TN | Zip code: 37055

3 a. Site address: 710 MARSHALL STUART DR DICKSON TN 37055 | City: | State: | Zip code: | County name: Dickson

b. Latitude (degrees, minutes & seconds): 00.0000 | Longitude (degrees, minutes & seconds): 00.0000

4. Owner name (may be corporation or company name): SUMIDEN WIRE PRODUTS CORP | Type: | Phone with area code: (615) 446-3199

5. Manager or operator name: BRIAN E BURR | Type: | Phone with area code: (615) 446-3199

6. Principal technical contact: BRIAN E BURR | FAX number with area code: 615-446-3197 | Phone with area code: (615) 446-3199

7. Number of employees: 52 | Year operation began: 1990 | SIC codes (Primary SIC first, etc.): 3315 | Job shop: (Y) Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	BRIAN BURR	8AM-5PM	(615) 446-3199
b.	GREG MURPHY	4PM-12PM	(615) 446-3199
c.	JEFF SIMON	12PM-8AM	(615) 446-3199
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ) No (X)

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
[signature]	Plant Mgr.	2/20/96

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
03-06-1996	22		Yes No Y	Yes No Y	

12. Date closed	TSDR status	Transporter status

13. Comments

CN-0969 (Rev. 11/95) RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and or correct identification and mail to address. Retain a copy for your records.

1. Organization's full name of facility SUMMEN WIRE PRODUCTS CORPORATION	EPA identification code TNF 00-000-1974
2. Waste name. Use standard name from regulations whenever possible. WASTE SOLVENT	WASTE STREAM NUMBER

3. Give the years that this waste has been generated, e.g. 1975, 1982.	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation Continuous Accidental/ Venous: ( ) One time
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.) D001	SIC code for generating process. 3315

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
000-2000 [illegible]	25		8.000	0.0	5,000.0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
400.0	4,800.0	400.0	30

7. DOT shipping name	DOT hazard class	DOT ID code
RQ WASTE FLAMMABLE LIQUID NOS	Flammable Liquids 3	UN1993

8. Describe the generation process.
SOLVENT USED FOR WIRE LUBRICATION (2)

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
	100		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A.		
B. MINERAL SPIRITS	50	75
C. SOLVENT 100	20	40
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

L 81, TU3

CN-0773 (Rev. 11/95) Form Continues on the Back RDA 2203

6(1)

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

1. Organization's full, legal name: Sumiden Wire Products Corporation			EPA identification code: TNR 00-000-1834	
2. Mailing address	City	State	Zip code	
3. a. Site address	City	State	Zip code	County name
b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)			
4. Owner name (may be corporation or company name)		Type	Phone with area code	
5. Manager or operator name: Brian Burr		Type	Phone with area code	
6. Principal technical contact: Brian Burr	FAX number with area code		Phone with area code	
7. Number of employees	Year operation began	SIC codes (Primary SIC first, etc.)		Job shop: Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	Brian Burr		(615) 446-2520 (615) 446-3199
b.	Kevin Natterstad		
c.	Gary Woods		
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
[signature]	PLANT MGR	2/5/98

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
03/03/1998					

12. Date closed	TSDR status	Transporter status

13. Comments: Postmarked 2/27/98 (DW)

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MAR 3 1998
Solid & Hazardous Waste

CN-0909 (Rev. 11/95) RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility: SUMIDEN WIRE PRODUCTS CORPORATION
   Installation identification number: TNR 00-000-1834

2. **Waste name**. Use standard name from regulations whenever possible.: WASTE SOLVENT
   WASTE STREAM NUMBER: 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1995
   Date no longer generated. (MM/DD/YY): 06-18-97
   Annual Frequency of generation: Continuous ____ Accidental/ One time ____ Various ____

4. Circle all appropriate **hazard criteria** below: Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g)
   EPA waste codes. (Primary first; six maximum.): D001
   SIC code for generating process.: 3315,

5. **Physical form** code: Liq-Othr (3)
   % Solid: 25
   % Water:
   Vol. to wt. conversion (pounds/gallon): 8.000
   If used for fuel, chlorine content(PPM): 0.0
   BTU per pound: 5,000.0

6. **Generation rates** in kilograms.
   Monthly maximum (kg): 400.0
   Annual average (kg): 4,600.0
   Maximum stored onsite (kg): 400.0
   Maximum days stored: 30

7. **DOT shipping** name: RQ WASTE FLAMMABLE LIQUID NOS
   DOT hazard class: Flam/Comb Liquids 03
   DOT ID code: UN1993

8. Describe the **generation process**.
   SOLVENT USED FOR WIRE LUBRICATION (2)

9. **Chemical Characteristics**.
   pH:
   Flash point: 100
   Reactive code:
   Concentration units. Use PPM for TCLP and EP Toxic wastes
   % volume( ), % weight( ), PPM( )

Hazardous constituents. Give range of values at right	lower value	upper value
A.		
B. MINERAL SPIRITS/	50	75
C. SOLVENT 100	20	40
D.		
E.		

10. Describe how you have managed or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

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Div. of Solid & Hazardous Waste

11. Annual Generation and Handling Data: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year 1997	A. Amount generated during year (kg)	B. Amount onsite Jan. 1 in temp. storage (kg)	C. Amount onsite Dec. 31 in temp. storage (kg)	D. Amount handled (kg)
	409	500	0	909

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	909 kg	T50, T54, T63	D2	~~909~~ kg	~~501~~
D3	Amount Handled ONsite kg	TSDR handling/Waste management methods	D4	Amount Handled ONsite kg	TSDR handling/Waste management methods

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
See Item 15			

13. Identify the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product (A)
B. In process recycling (B)
C. Equipment/technology modification (C)
D. Substituting raw materials (D)
E. Improved operations (E).
F. Reduction research/planning (R)
G. No effort (F)
H. Other - briefly explain here (G)

14. Rate the **helpfulness** of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance A(No NA Yes)
B. Technical feasibility B(No NA Yes)
C. Economic practicality C(No NA Yes)
D. Measurement/accounting methods D(No NA Yes)
E. TN hazardous waste regulations E(No NA Yes)
F. Implementation experience F(No NA Yes)
G. High costs of haz. waste mgt G(No NA Yes)
H. Accidental generation H(No NA Yes)
I. Other - describe here: I (No NA Yes)

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

Use of this hazardous solvent was terminated in 1997 - it was replaced with a non-hazardous solvent.

16. Certification: I certify that the information given on this form is true, accurate and complete

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
[signature]	PLANT MGR	2/24/98

*** Below is for Department use only. ***

17. Date received (MM/DD/YY)	Complete?	Test results? Yes No	Reasonable? Yes No	Follow-up Yes No	Initials Yes No
03/03/1998					DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological Corrective Action (C); Waste wastes (R); water Rx (W); Universal Waste (U)

Status: 6 Further Reporting: N

18. Comments.

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MAR 3 1998
Div. of
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility SUMIDEN WIRE PRODUCTS CORPORATION	**Installation identification number** TNR 00-000-1834
2. **Waste name**. Use standard name from regulations whenever possible. WASTEWATER TREATMENT SLUDGE FROM ELECTROPLATING OPERATIONS	WASTE STREAM NUMBER 2

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1990-CURRENT	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation Continuous ___ Accidental/ One time ___ Various (C)
4. Circle all appropriate **hazard criteria** below. Ignitable (a). EP toxic (b). Corrosive (c). Reactive (e). Other toxic (f). TCLP (g).	EPA **waste codes**. (Primary first; six maximum.) F006	**SIC code** for generating process. 3315.

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Sldg-Watr (5)	25	75	8.500	0.0	0.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
5,260.0	69,400.0	16,500.0	90

7. **DOT shipping** name	DOT hazard class		DOT ID code
ENVIRONMENTALLY HAZARDOUS SUBSTANCE SOLID NOS	Misc Haz. Mat	09	UN3077

8. Describe the generation process.
SLUDGE CAKE FROM FILTER PRESS FOLLOWING ~~NaOH~~ Lime TREATMENT OF WASTEWATERS FROM ELECTROPLATING OF NICKEL ON STAINLESS STEEL WIRE.

9. **Chemical Characteristics.**

pH	Flash point	Reactive code	**Concentration units**. Use PPM for TCLP and EP Toxic wastes % volume( ). % weight( ). PPM(X) (P)

Hazardous constituents. Give range of values at right.	lower value	upper value
A. NICKEL (TOTAL)	60000	100000
B. CHROMIUM (TOTAL)	2000	4000
C. BARIUM (TOTAL)	10	30
D. LEAD (TOTAL)	10	50
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

T21, D81

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Div. of
Solid & Hazardous Waste

CN-0773 (Rev. 11/95) Form Continues on the Back RDA 2203 and 2497

6(Y)

97072

[redacted] [redacted]

11. Annual Generation and Handling Data: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year 1997	A. Amount generated during year (kg)	B. Amount onsite Jan. 1 in temp. storage (kg)	C. Amount onsite Dec. 31 in temp. storage (kg)	D. Amount handled (kg)
	97,072	~~2,967~~ 3,382	6,218	~~94,221~~ 94,236

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	94,236 ~~94,221~~ kg	T21, D81	D2	~~94,221~~ 94,236 kg	S01
D3	Amount Handled ONsite kg	TSDR handling/Waste management methods	D4	Amount Handled ONsite kg	TSDR handling/Waste management methods

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.

13. Identify the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product (A)
B. In process recycling (B)
C. Equipment/technology modification (C)
D. Substituting raw materials (D)
E. Improved operations (E)
F. Reduction research/planning (R)
G. No effort (E)
H. Other - briefly explain here (G)
Planning for sludge drying and nickel reclamation.

14. Rate the helpfulness of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance A(No NA Yes)
B. Technical feasibility B(No NA Yes)
C. Economic practicality C(No NA Yes)
D. Measurement/accounting methods D(No NA Yes)
E. TN hazardous waste regulations E(No NA Yes)
F. Implementation experience F(No NA Yes)
G. High costs of haz. waste mgt G(No NA Yes)
H. Accidental generation H(No NA Yes)
I. Other - describe here: I(No NA Yes)
Plan under development.

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

Upon discovering in 1997 that this sludge was a hazardous waste, Sunniden began investigating the feasibility of installing a sludge dryer to improve the potential for marketing the sludge as a nickel-rich material from which nickel may be reclaimed. This effort is continuing.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE:
[signature]	PLANT MGR	2/24/98

*** Below is for Department use only. ***

17. Date received (MM/DD/YY)	Complete?	Test results? Yes No	Reasonable? Yes No	Follow-up Yes No	Initials Yes No
03/03/1998					DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological Corrective Action (C); Waste wastes (R); water Rx (W), Universal Waste (U)

Status	Further Reporting

18. Comments.

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DIV SOLID WASTE MGT

APR 28 1998

Group No._____ File No._____

ID No._____

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name at facility: Sumiden Wire Products Corporation	EPA identification code: TNR 00-000-1834
2. Waste name. Use standard name from regulations whenever possible.: Waste Hydrochloric Acid / Solutions	WASTE STREAM NUMBER: 3

3. Give the years that this waste has been generated, e.g. 1975, 1982-: 1997	Date no longer generated. (MM/DD/YY):	Annual Frequency of generation: Continuous, Accidental, Various, One time
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g): C	EPA waste codes. (Primary first; six maximum.): D002	SIC code for generating process: 3315

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
2	<5	<70	9.7	NA	NA

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
NA	660 (est.)	240 (est.)	90

7. DOT shipping name	DOT hazard class		DOT ID code
Hydrochloric Acid Solution	Corrosive Material	08	UN 1789

8. Describe the generation process.

Generated from infrequent accidental spills of solution from the electropolishing baths located in the Stainless Plant (Building S-1). Waste can also be generated from infrequent accidental spills of raw acid from storage at both the Stainless Plant (Building S-1) and the PC Plant (Building S-3).

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume( ), % weight( ), PPM( )
<2.0	NA	NA	

Hazardous constituents. Give range of values at right.	lower value	upper value
A. HCl		<31
B. Chromium		<0.0270
C. Nickel		<0.0460
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

S01 → H06

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MAR 3 1998
Div. of Solid & Hazardous Waste

11. **Annual Generation and Handling Data**: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year	A. Amount generated during year (kg)	B. Amount onsite January 1 in temp. storage (kg)	C. Amount onsite December 31 in temp. storage (kg)	D. Amount handled (kg)
~~1996~~ 1997	243	0	0	243

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	0	NA	D2	243	~~S01~~, H06
	Amount Handled ONsite	**TSDR handling/Waste management methods**		**Amount Handled ONsite**	**TSDR handling/Waste management methods**
D3			D4		

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
NA	NA	NA	

13. Identify the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product .....(A)
B. In process recycling .....(B)
C. Equipment/technology modification .....(C)
D. Substituting raw materials .....(D)
E. Improved operations .....(E)
F. Reduction research/planning .....(F)
G. No effort .....(F)
H. Other - briefly explain here .....(G)

14. Rate the helpfulness of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance .....A(No NA Yes)
B. Technical feasibility .....B(No NA Yes)
C. Economic practicality .....C(No NA Yes)
D. Measurement/accounting methods ...D(No NA Yes)
E. TN hazardous waste regulations .....E(No NA Yes)
F. Implementation experience .....F(No NA Yes)
G. High costs of haz. waste mgt ....G(No NA Yes)
H. Accidental generation .....H(No NA Yes)
I. Other - describe here: .....I (No NA Yes)
Plan under development.

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

This waste results only from accidental spills and other releases, and Sumiden always endeavors to minimize such generation.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE:	DATE.
[signature]	PLANT MGR	2/5/98

*** Below is for Department use only. ***

17. Date received (MM/DD/YY)	Complete?	Test results?	Reasonable?	Follow-up	Initials
03/03/1998	Yes No	Yes No	Yes No	Yes No	DBW

Status: Not Hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (S); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R); Corrective Action (C); Waste water Rx (W).

Status: W

Further Reporting: Y N

18. Comments.

RECEIVED
MAR 3 1998
Div. of
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

N&W

1. Organization's full name at facility: Sumiden Wire Products Corporation	EPA identification code: TNR 00-000-1874
2. Waste name. Use standard name from regulations whenever possible.: Waste Sulfuric Acid / Solution	WASTE STREAM NUMBER: 4
3. Give the years that this waste has been generated, e.g. 1975, 1982.: 1997	Date no longer generated. (MM/DD/YY):
	Annual Frequency of generation: Continuous (Accidental) Various One time
4. Circle all appropriate hazard criteria below: Ignitable (a), EP toxic (b), (Corrosive (c)) Reactive (e), Other toxic (f), TCLP (g). C	EPA waste codes. (Primary first; six maximum.): D002
	SIC code for generating process.: 3315

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
2	<5	<90	<15.3	NA	NA

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
NA	800(est.)	300 (est.)	90

7. DOT shipping name	DOT hazard class		DOT ID code
Sulfuric Acid	Corrosive Material	08	UN1830

8. Describe the generation process.

Generated from infrequent accidental spills of solution from the electropolishing baths located in the Stainless Plant (Building 5-1), and from the pickling bath located in the PC Plant (Building 5-3). Waste can also be generated from infrequent accidental spills of raw acid from storage in both plants.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume( ), (% weight), PPM( )
<1.7	NA	NA	

Hazardous constituents. Give range of values at right.	lower value	upper value
A. H_2SO_4	10	94
B. Chromium		<0.0270
C. Nickel		<0.0460
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

S01 → H06

RECEIVED
MAR 3 1998
Div. of Solid & Hazardous Waste

11. **Annual Generation and Handling Data**: Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report year	A. Amount generated during year (kg)	B. Amount onsite January 1 in temp. storage (kg)	C. Amount onsite December 31 in temp. storage (kg)	D. Amount handled (kg)
~~1996~~ 1997	386	0	0	386

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	0	NA	D2	386	~~S01~~, H06
	Amount Handled ONsite	**TSDR handling/Waste management methods**		**Amount Handled ONsite**	**TSDR handling/Waste management methods**
D3			D4		

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
NA	NA	NA	

13. Identify the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product .....(A)
B. In process recycling .....(B)
C. Equipment/technology modification.....(C)
D. Substituting raw materials.....(D)
E. Improved operations .....(E)
F. Reduction research/planning .....(F)
~~G. No effort .....(F)~~
H. Other - briefly explain here .....(G)

14. Rate the helpfulness of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance .....A(No NA Yes)
B. Technical feasibility.....B(No NA Yes)
C. Economic practicality .....C(No NA Yes)
D. Measurement/accounting methods...D(No NA Yes)
E. TN hazardous waste regulations .....E(No NA Yes)
F. Implementation experience.....F(No NA Yes)
G. High costs of haz. waste mgt ....G(No NA Yes)
H. Accidental generation .....H(No NA Yes)
I. Other - describe here: .....I (No NA Yes)
Plan under development.

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

This waste results only from accidental spills and other releases, and Sunider always endeavors to minimize such generation.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE (Generator or authorized representative)	TITLE	DATE
[signature]	PLANT MGR	2/5/98

Below is for Department use only.

17. Date received (MM/DD/YY)	Complete?	Test results?	Reasonable?	Follow-up	Initials
03/03/1998	Yes No	Yes No	Yes No	Yes No	DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R); Corrective Action (C); Waste water Rx (W).

Status: W

Further Reporting: Y N

18. Comments.

RECEIVED
MAR 3 1998
Div. of
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name at facility: Sumidon Wire Products Corporation	EPA identification code: TNR 00-000-1834
2. Waste name. Use standard name from regulations whenever possible.: Spent Hydrochloric Acid Electropolishing Solution	WASTE STREAM NUMBER: 5
3. Give the years that this waste has been generated, e.g. ~~1975~~, 1982-.: 1998 (Planned)	Date no longer generated. (MM/DD/YY):
	Annual Frequency of generation: Continuous, Accidental/ One time, (Various)
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), (Corrosive (c)), Reactive (e), (Other toxic (f)), TCLP (g). CF	EPA waste codes. (Primary first; six maximum.): K062, D002
	SIC code for generating process.: 3315

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
2	<5	<80	8.6	NA	NA

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
2,345	4,690	2,345	90

7. DOT shipping name	DOT hazard class		DOT ID code
Hydrochloric Acid Solution	Corrosive Material	08	UN 1789

8. Describe the generation process.

Generated from the periodic changeout of solution from the electropolishing baths in the Stainless Plant (Building S-1).

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume( ), (% weight( ), PPM( )
<2.0	NA	NA	

Hazardous constituents. Give range of values at right.	lower value	upper value
A. HCl	15.6	19.6
B. Chromium		<0.0270
C. Nickel		<0.0460
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

S01 → H06

RECEIVED
MAR 3 1998
Div. of
Solid & Hazardous Waste

11. **Annual Generation and Handling Data:** Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year ~~1996~~ 1997	A. Amount generated during year (kg)	B. Amount onsite January 1 in temp. storage (kg)	C. Amount onsite December 31 in temp. storage (kg)	D. Amount handled (kg)
	0	0	0	0

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	0		D2	0	
	Amount Handled ONsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D3			D4		

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
NA	NA	NA	

13. Identify the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product .....(A)
B. In process recycling .....(B)
C. Equipment/technology modification .....(C)
D. Substituting raw materials .....(D)
E. Improved operations .....(E)
F. Reduction research/planning .....(F)
G. No effort .....(F)
H. Other - briefly explain here .....(G)

14. Rate the helpfulness of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance .....A(No NA Yes)
B. Technical feasibility .....B(No NA Yes)
C. Economic practicality .....C(No NA Yes)
D. Measurement/accounting methods ...D(No NA Yes)
E. TN hazardous waste regulations .....E(No NA Yes)
F. Implementation experience .....F(No NA Yes)
G. High costs of haz. waste mgt ....G(No NA Yes)
H. Accidental generation .....H(No NA Yes)
I. Other - describe here: .....I (No NA Yes)
Plan under development,

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

Beginning in 1998, Sunidex plans on initiating an annual change-out of its various bath solutions in an effort to improve product quality. If these change-outs do result in significant improvements in product quality and are determined cost-effective, periodic change-outs will likely occur and it will be difficult to reduce such generation.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE (Generator or authorized representative)	TITLE:	DATE:
[signature]	PLANT MGR	2/5/98

Below is for Department use only.

17. Date received (MM/DD/YY)	Complete?	Test results?	Reasonable?	Follow-up	Initials
03/03/1998	Yes No	Yes No	Yes No	Yes No	DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R); Corrective Action (C); Waste water Rx (W).

Status	Further Reporting
6	Y N

18. Comments.

RECEIVED
MAR 9 1998
Div. of
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name at facility: Sumidon Wire Products Corporation	EPA identification code: TNR 00-000-1834
2. Waste name. Use standard name from regulations whenever possible.: Spent Sulfuric Acid Electropolishing/Pickling Solution	WASTE STREAM NUMBER: 6
3. Give the years that this waste has been generated, e.g. 1975, 1982-: 1997	Date no longer generated. (MM/DD/YY):
	Annual Frequency of generation: Continuous Accidental/ One time Various
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). CF	EPA waste codes. (Primary first; six maximum.): K062, D002
	SIC code for generating process.: 3315

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
2	<5	<80	9.9	NA	NA

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
2,700	15,750	7,650	90

7. DOT shipping name	DOT hazard class		DOT ID code
Spent Sulfuric Acid	Corrosive Material	08	UN 1832

8. Describe the generation process.

Generated from the periodic changeouts of solutions from the electropolishing baths in the Stainless Plant (Building 5-1), and from the pickling bath in the PC Plant (Building 5-3).

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume( ), % weight( ), PPM( )
<1.7	NA	NA	

Hazardous constituents. Give range of values at right.	lower value	upper value
A. H_2SO_4	13.2	22.2
B. Chromium		<0.0270
C. Nickel		<0.0460
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

S01 → H06

RECEIVED
MAR 3 1998
Div. of
Solid & Hazardous Waste

11. **Annual Generation and Handling Data:** Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg).

Report Year	A. Amount generated during year (kg)	B. Amount onsite January 1 in temp. storage (kg)	C. Amount onsite December 31 in temp. storage (kg)	D. Amount handled (kg)
~~1998~~ 1997	900	0	900	0

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	0		D2	~~900~~	~~50%~~
	Amount Handled ONsite	**TSDR handling/Waste management methods**		**Amount handled ONsite**	**TSDR handling/Waste management methods**
D3			D4		

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
NA	NA	NA	

13. Identify the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product.....(A)
B. In process recycling.....(B)
C. Equipment/technology modification.....(C)
D. Substituting raw materials.....(D)
E. Improved operations.....(E)
F. Reduction research/planning.....(F)
G. No effort.....(F)
H. Other - briefly explain here.....(G)

14. Rate the helpfulness of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance.....A(No NA Yes)
B. Technical feasibility.....B(No NA Yes)
C. Economic practicality.....C(No NA Yes)
D. Measurement/accounting methods...D(No NA Yes)
E. TN hazardous waste regulations.....E(No NA Yes)
F. Implementation experience.....F(No NA Yes)
G. High costs of haz. waste mgt....G(No NA Yes)
H. Accidental generation.....H(No NA Yes)
I. Other - describe here:.....I (No NA Yes)
Plan under development.

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction. This waste resulted from a maintenance-related changeout of bath solution. Periodic change-outs of bath solutions will be performed in an effort to improve product quality. If these (probably annual) bath change-outs do result in significant improvements in product quality and are determined cost-effective, periodic change-outs will likely occur and it will be difficult to reduce such generation.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE.	DATE.
[signature]	PLANT MGR	2/5/98

"*" Below is for Department use only.

17. Date received (MM/DD/YY)	Complete?	Test results?	Reasonable?	Follow-up	Initials
03/03/1998	Yes No	Yes No	Yes No	Yes No	DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R); Corrective Action (C); Waste water Rx (W).

Status: 6

Further Reporting: Y N

18. Comments.

RECEIVED

MAR 3 1998

Div. of
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name at facility: Sumiden Wire Products Corporation	EPA identification code: TNR 00-000-1834
2. Waste name. Use standard name from regulations whenever possible.: Waste Nickel-Plating Bath Solution	WASTE STREAM NUMBER: 7
3. Give the years that this waste has been generated, e.g. 1975, 1982: (1998) / Date no longer generated. (MM/DD/YY)	Annual Frequency of generation: Continuous (Accidental) Various One time
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), (Corrosive (c)), Reactive (e), (Other toxic (D)), TCLP (g). CF / EPA waste codes. (Primary first; six maximum.) D002, D007	SIC code for generating process. 3315

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
2	<5	<70	10.1	NA	NA

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
NA	230	230	90

7. DOT shipping name	DOT hazard class		DOT ID code
Environmental Hazardous Substance, liquid, n.o.s.	Miscellaneous Hazardous Materials	09	UN 3082

8. Describe the generation process.

Generated from infrequent accidental spills of solution from the Nickel-Plating Baths located in the Stainless Plant (Building S-1).

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume ( ) (% weight)) PPM ( )
<1.7	NA	NA	

Hazardous constituents. Give range of values at right.	lower value	upper value
A. H_2SO_4	17.8	
B. Nickel	7.5	
C. Chromium	0.0020	
D. HCl	4.6	
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

S01 → H06

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MAR 9 1998
Div. of Solid & Hazardous Waste

CN-0773 (Rev. 11/95) Form Continues on the Back RDAs 2203 and 2497

11. **Annual Generation and Handling Data:** Complete blocks A to D as the formula A + B - C = D as expressed in kilograms (kg)

Report Year	A. Amount generated during year (kg)	B. Amount onsite January 1 in temp. storage (kg)	C. Amount onsite December 31 in temp. storage (kg)	D. Amount handled (kg)
~~1996~~ 1997	0	0	0	0

If the waste was shipped offsite, give total in block D1 and submit an Offsite Shipping Report. Report onsite handling in blocks D2 to D4. For all handling that requires a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "H" codes.

	Total Handled OFFsite	TSDR handling/Waste management methods		Amount Handled ONsite	TSDR handling/Waste management methods
D1	0		D2	0	
	Amount Handled ONsite	**TSDR handling/Waste management methods**		**Amount Handled ONsite**	**TSDR handling/Waste management methods**
D3			D4		

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
NA	NA	NA	

13. Identify the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods. Circle the code for applicable efforts to the right of each description.

A. Reformulation/redesign of product .....(A)
B. In process recycling .....(B)
C. Equipment/technology modification .....(C)
D. Substituting raw materials .....(D)
E. Improved operations .....(E)
F. Reduction research/planning .....(R)
G. No effort .....(F)
H. Other - briefly explain here .....(G)

14. Rate the helpfulness of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

A. Training or technical assistance .....A(No NA Yes)
B. Technical feasibility .....B(No NA Yes)
C. Economic practicality .....C(No NA Yes)
D. Measurement/accounting methods ...D(No NA Yes)
E. TN hazardous waste regulations .....E(No NA Yes)
F. Implementation experience .....F(No NA Yes)
G. High costs of haz. waste mgt ....G(No NA Yes)
H. Accidental generation .....H(No NA Yes)
I. Other - describe here: .....I (No NA Yes)
Plan under development.

15. Narrative: if necessary, briefly provide more explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

This waste results only from accidental spills and other releases, and Sumiden always endeavors to minimize such generation.

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative)	TITLE.	DATE.
[signature]	PLANT MGR	2/5/98

Below is for Department use only.

17. Date received (MM/DD/YY)	Complete?	Test results?	Reasonable?	Followup	Initials
03/03/1998	Yes, No	Yes No	Yes No	Yes No	DBW

Status: Not hazardous (1); Demonstrated not hazardous (2); Treatment Residue (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R); Corrective Action (C); Waste water Rx (W).

Status: 6

Further Reporting: Y N

18. Comments.

U.S. EPA REGION IV

SDMS

POOR LEGIBILITY

PORTIONS OF THIS DOCUMENT MAY BE UNREADABLE, DUE TO THE QUALITY OF THE ORIGINAL

*PLEASE CONTACT THE APPROPRIATE RECORDS CENTER TO VIEW THE MATERIAL

7.19.89 mt

7.24.89 DSlom L&C

BWM 7.24.89

TDY 7-24-89

Teksid Aluminum Foundry, Inc.

July 17, 1989

Mr. Tom Tiesler
Director
Division of Solid Waste Management
Tennessee Department of Health and Environment
Customs House - Fourth Floor
701 Broadway
Nashville, TN 37219-5403

Dear Mr. Tiesler:

Enclosed with this letter are completed Hazardous Waste Notification and Hazardous Waste Stream Report forms for our aluminum foundry in Dickson, Tennessee.

These forms are submitted to your office in order to obtain a generator EPA I.D. No. and to inform you of our waste management activities. Teksid does not normally generate hazardous wastes. We generate spent oils and some solid, waste resins which we do not believe contain any hazardous constituents or exhibit any hazardous characteristics as defined by 40 CFR Part 261 and TDHE Rule 1200-1-11-.02. We are currently testing these materials to ensure that this is the case and we have retained ECKENFELDER INC. to advise us in the proper management and disposal of our plant wastes.

The Teksid Aluminum Foundry is a new facility and we have never shipped any spent oils or chemical wastes for disposal. In the near future, we expect to ship a single 55-gal drum of resin-contaminated sulfuric acid and several drums of obsolete or unusable raw chemicals which we are unable to use or recycle. These materials will be manifested, shipped, and disposed at approved facilities in accordance with all USEPA and TDHE regulations.

We at Teksid are committed to maintaining our facility and conducting our operations to assure that compliance with all applicable environmental regulations and standards are achieved. We appreciate any assistance that your office can offer in this regard.

Sincerely,

L.C. McKee

L.C. McKee
Purchasing Director

cc: William N. Hansard, ECKENFELDER INC.

Route 7, Box 319 • Colesbory Road
Dickson, TN 37055
Telephone (615) 446-5115

Hazardous Waste Notification DEC 14

Mark changes on this form. Full instructions are given with Form PH-2019A

1. Organization & name
TEKSID ALUMINUM FOUNDRY, INC.
EPA ID CODE
TND 98-212-42

2. Mailing address
RT 7 BOX 319 COLESBURG RD.
City
DICKSON
State/zip
TN 37055

3. Physical location of address
RT 7 BOX 319 COLESBURG RD
County name
DICKSON

Latitude / Longitude
36.0236 / 97.2000

4. Owner name
TEKSID ALUMINUM FOUNDRY INC
Phone
(615) 446-81

5. Manager or operator name
GIOVANNI BARBERO
Phone
(615) 446-81

6. Principal technical contact
PETE MCKEE
Phone
(615) 446-81

7. Number of employees
180
Year began
1987
SIC codes
3363
Job shop
NO

8. Emergency contacts
Name
A. GIOVANNI BARBERO
B. PETE MCKEE
C. RICHARD EIGAR
Time period covered
8:00 AM-4:00 PM
4:00PM-12:00AM
12:00AM-8:00AM
Phone
(615)446-7363
(615)264-1273
(615)446-7363

9. Current environmental permits (air, water, and radio)
Give permit type, number and expiration date (in a range of related permits)
Indicate by giving the first and last permit number.
AIR PERMITS EXPIRE OCTOBER MAY 31 1988-TEKSID IS CURRENTLY WORKING WI
THE TENNESSEE AIR POLLUTION CONTROL BOARD TO REVISE AND UPDATE OUR AIR
EMISSIONS PERMITS

10. Check hazardous waste that applies activities below.
Fuel blending or marketing
Fuel burning
Transporting fuel
Ex

11. I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date.
Charles Xxxx

Below is for Dept. Use only

12. Date rec'd
03/89
County
Priority
Generator
Yes No
Small gen.
Yes No
Special rep.

13. Date closed
00/00
Date acknowledged
00/00
Date acquainted
00/00
Hisp.
Prem.

14. Comments

Hazardous Waste Stream Report - Front DEC 14, 199

Mark changes on this form. Full instructions are given with Form PH-2022.

1. Organization's name. | EPA ID CODE
TEKSID ALUMINUM FOUNDRY, INC. TND 98-212-4273

2. Waste name. | Waste stream ID
SULFURIC ACID 1

3. Give years waste generated | Date stopped | Frequency of generation
1989 4/10/89 ACCIDENTAL

4. Mark all appropriate hazard criteria below. |EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES! C !D002 | 3363

5. Physical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, WATER BASED | 1.0| | 9.000 | .0 | .0

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
82 90

7. DOT shipping name | DOT hazard class | DOT ID code
SULFURIC ACID CORROSIVE UN1832

8. Describe generation process.
RESIN WASTE ACCIDENTALLY PLACED IN PARTIALLY FILLED 55-GAL`DRUM OF
SULFURIC ACID.^

ANNUAL REPORT SECTION ** LINES 9-11

9.

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1990	- 0 -	82	- 0 -

	Amount Handled by site			TSDF handling/Waste management methods
A	OFFSITE:		N	
B	ONSITE:	82 kg	Y	See No. 13
C	ONSITE:		Y	
D	ONSITE:		Y	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . b( ) e. Improved operations. . . . e(
c. Equipment/technology modification c( ) f. No effort. . . . . f(x)

g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c(x). | Amt of Reduction (kg)

MAR 2 2 1991

Hazardous Waste Stream Report - Front DEC 14, 1

Mark changes on this form. Full instructions are given with Form PH-2022.

1. Organization's name.
TENSID ALUMINUM FOUNDRY, INC. | EPA ID CODE. TND 98-212-4273

2. Waste name.
DISCARDED CHEMICAL PRODUCTS- | Waste stream I 2

3. Give years waste generated | Date stopped | Frequency of generation
1989 4/10/89 VARIOUS

4. Mark all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f) | EPA waste codes | SIC
CODES: NK FOOD | 3363

5. Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 1.01 | 10.000 | .0 | .0

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
1,250 1,250 180

7. DOT shipping name.
Solid | DOT hazard class | DOT ID code.
O R M - E

8. Describe generation process.
OFF-SPECIFICATION OR DISCARDED CHEMICAL PRODUCTS^

9. ANNUAL REPORT SECTION ** LINES 9-11

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1990	- 0 -	1250	- 0 -

	Amount Handled by site		TSDF handling/Waste management methods
A	OFFSITE: Yes	N	D80
B	ONSITE:	Y	
C	ONSITE:	Y	
D	ONSITE:	Y	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.
a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling b( ) e. Improved operations e(
c. Equipment/technology modification c( ) f. No effort f(X)
g. Other - explain below: g(X)

11. Transmittal letter
Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. More toxic-a( ) b. Less toxic-b( ) c. No change-c( ) | Amt of Reduction (kg)

MAR 28 1991

23-2380

DWS / L.C

TO	DATE
UST	
DSWM	

TELEPHONE/MEETING RECORD

DATE: 08/28/91

TO: Jerry Pence water well complaint Files

FROM: Luke Ewing, geologist DWS 741-2281

SUBJECT: Jerry Pence water well (TAG # 000969)
550 ~~Dugan Cemetary~~ Rd. ID # 0430115 3
Dickson Tn. 37055 phone 446-0569

Luke Ewing, Division of Water supply responded to complaint concerning water quality at Pence well site on 07/31/91, 08/01/91 and 08/20/91. Metals, Routine, VOAs, Extract, and TPH were collected from kitchen tap well water. Water was clear but had slight oil smell to water. Static level of well was measured to be ± 65ft with solvent or oil smell on probe when pulled from well. Well was located next to gravel road next to driveway - Casing above ground level - capped with pitless adapter + sub pump - Reported depth 420ft. Water bearing zone hit at +- 40ft. Partial results of water sample indicate low levels of VOAs in well (see sample results 91-08-0022 collected 08/01/91).
A Bailer sample from well was collected by Luke Ewing on 08/20/91. Bailer sample from well had floating product on surface of static level, VOAs + Extract + TPH sampled. Product in Bailer was observed to be very light yellow range 2 inches to 6 inches in Bailer with not much smell.

Water sample had a very oily feel and it was hard to collect sample from bailer with goves on. Lab results by phone to CLE from organics indicate bailer sample collected to be low in VOAs <5ppb but very high in TPH extractables with results → as 652,000 ppb
VPH – none
Prelim lab analysis indicate bailer sample to contain some type of heavy weight oil.

Pence called CLE about two weeks after initial sample collected to report that he had talked to a friend that had seen local industry in area dumping oil on ground + ditches within area. CLE advised Pence to contact DSWM and also for his friend to report dumping location of industries from well are ballpark 1/2 mile from well. CLE contacted AC with DSWM 8/27/91 to report findings. CLE also talked to driller of well or Norman to get info of pump in well. Pump is reported to be of Goulds make with no oil in pump parts.

log has been requested by CLE from Norman Well Drilling

CLE CAN THINK OF ONLY 4 OPTIONS TO EXPLAIN PRESENCE OF OIL IN PENCE WELL

(1) NATURAL - VERY DOUBTFULL (NO VOAS) OIL LOOKS TOO REFINED - ALSO WELL HAS BEEN IN USE FOR 10 YRS WITH NO PROBLEMS UNTIL 6 MOS AGO

(2) FROM PUMP - INFORMATION FROM DRILLER INDICATES THAT THIS TYPE OF PUMP DOES NOT CONTAIN OIL IN SYSTEM

(3) SOMEPERSON PLACED OIL IN WELL TO GET BACK AT PENCE FOR AN UNKNOWN REASON

(4) SOME TYPE OF INDUSTRY HAS DUMPED OILS IN AREA & IT HAS GOTTEN INTO GROUND WATER SUPPLY

Pence 8/27/91 FROM LAB.

Heavy Wt. Oil. Motor oil —

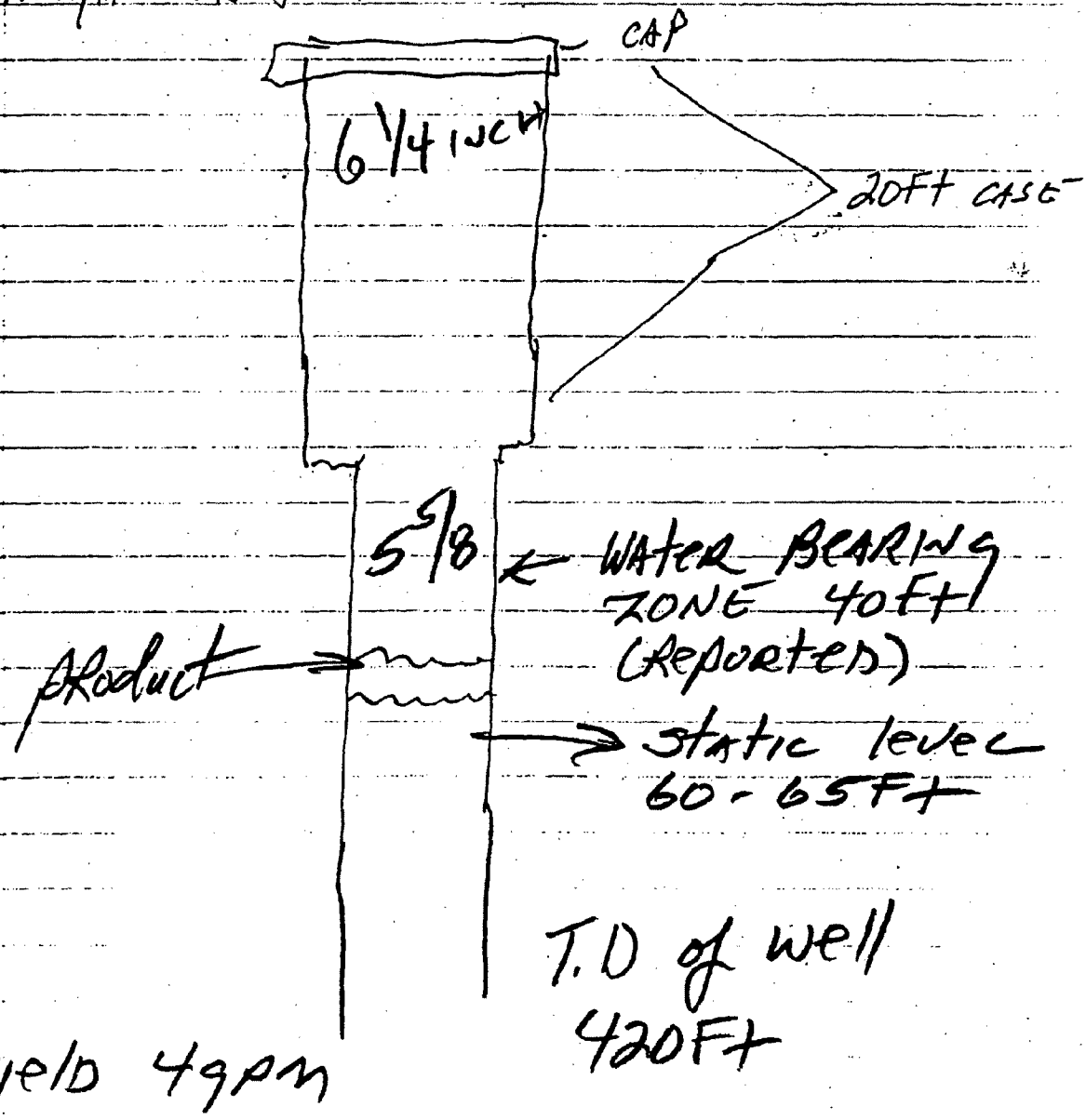
Heavy pump oil — lighter weight.

similar motor oil

pencoil →

Suspected Const. of well

ROUGH DRAFT



NNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT

OFFICE CORRESPONDENCE

FROM	TO	DATE
UST	EHS	11-26

DATE: November 20, 1991

TO: Ken Bunting

FROM: Chuck Head Chuck Head 11/25/91

SUBJECT: Pence Water Well, Case #5-229001

The Division of Underground Storage Tanks has been involved in an investigation to locate the source of the contamination found in a drinking water well in Dickson County (a copy of the file is included for your review). The case was referred by the Division of Water Supply. This well is located on residential property owned by Mr. and Mrs. Jerry Pence. The property is located on Dugan Cemetery Road off the Old Columbia Highway (Burns Quadrangle) approximately 1/2 mile south of the Dickson Industrial Park.

A 1000 gallon underground storage tank on the Moore's property located just north of the Pence residence at one time contained gasoline but at the present contains diesel fuel. Samples from the Pence's well were collected on separate occasions for petroleum product analyses. These samples were submitted to the State Laboratory and compared to gasoline, kerosene, diesel and on one occasion, crude oil. The results indicate the presence of an unknown "heavy weight oil" with a higher boiling point than diesel.

Total Petroleum Hydrocarbon analyses revealed the presence of extractable petroleum hydrocarbons. Benzene (8.3ppb) and toluene (1.6ppb) were detected in a sample collected from the kitchen tap on August 7, 1991. A sample bailed directly from the well on August 20, 1991 by the Division of Water Supply for extractable organic analysis contained several polynuclear aromatic hydrocarbon compounds.

FROM	DATE
CH	
TO	
KWB	

Samples were collected from two other wells in the area for volatile organic and total petroleum hydrocarbon analyses. Both wells' volatile organic analyses came back "not detected" and the Total Petroleum Hydrocarbon analyses came back less than the analytical detection limit.

Mr. Pence informed the Division of Water Supply an acquaintance of his witnessed someone pouring out drums of liquid behind the Teksid Aluminum Foundry (located on the south side of the Dickson Industrial Park). UST personnel visited the facility and collected samples of the facility's oils for analytical comparison with the water from the Pence's well. These samples were analyzed by the State Laboratory as well as a private laboratory (different analytical methods where employed). The private laboratory, Specialized Assays, used the Modified California Method for total petroleum hydrocarbons. Division personnel compared the chromatograms of the oils with the chromatogram of the well water; one probable match was determined. The State Laboratory used the Petroleum Products method; they determined two possible matches to the well water (the water contained peaks present in both oils).

At this point in the investigation, the contamination found in the Pence's well does not appear to originate from an underground storage tank. As mentioned before, the Pence residence is located near a highly industrialized area. The Division of Underground Storage Tanks recommends the case be referred to the appropriate Division for further investigation of the Tekaid Aluminum Foundry as a possible contaminant source and for initial investigation of other possible sources in the area.

LR/F3081326

22-0 SW file Route: TAG 8/7 ECG Central Files

DSWM L.C.

AUG 05 1992

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

NASHVILLE ENVIRONMENTAL FIELD OFFICE
537 BRICK CHURCH PARK DRIVE
NASHVILLE, TENNESSEE 37243-1550

July 28, 1992

Mr. Giuseppe Allievi
Takeid Aluminum Foundry, Inc.
1835 Old Columbia Road
Dickson, TN 37055

CERTIFIED MAIL
P 079 446 630

SUBJECT: NOTICE OF VIOLATION

Dear Mr. Allievi:

Mr. Tom Yates and I have met with you on environmental issues twice in the last few months. I am writing specifically to address the unauthorized disposal of the foundry sands immediately behind your plant. We have had some discussion on the matter each time I visited you. Such disposal on a site without a permit from the Department violates TCA 68-31-106 of the Solid Waste Act.

By this letter, I am establishing a compliance schedule for Takeid to submit to this office a "plan of action" to bring its facility into compliance. The plan must be submitted within thirty (30) days of receipt of this notice. It must outline major steps which will be taken and include a schedule for each major activity to be accomplished showing how compliance will be achieved. When the Division of Solid Waste Management approves the plan, it must be implemented according to the approved schedule.

If you need to discuss alternatives or projected schedules, please call me at (615) 741-0634.

Sincerely,

Doye Rowland

Doye Rowland, Manager
Nashville Field Office
Division of Solid Waste Management

DR/S1012210

cc: Tom Tiesler, Director, DSWM
Teresa Conring, SWM Enforcement
Wayne Harbin, NFO, SWM

DSWM LEE

COMBS INDUSTRIAL SERVICES, INC.
The Complete Industrial Maintenance Services

Teksid Aluminum Foundry, Inc.
1635 Old Columbia Rd.
Dickson, Tn. 37055

August 27, 1992

Gentlemen:

This is to inform you of the progress in disposing of the fourty-four (44) drums of waste material we removed on 8-18-92, from your storage in Dickson, Tennessee.

These drums were brought to our facility and transferred to another carrier. They left on 8-25-92 for a class B facility in Wyandotte, Michigan.

I am enclosing a copy of your manifest and waste profile. These contain the names, addresses, and numbers pertaining to the disposal of your waste material.

Thank you again for your business, and I hope you will think of us for your future industrial cleaning or disposal needs.

Very truly yours,

David Butler

P.O. Box 189 • Whites Creek, TN 37189-0189
Nashville Phone: (615) 226-3801 FAX: (615) 226-4103
OUTSIDE TN-KY 1-800-876-3620
CWIS: 1-800-280-3623

Chem Met Services, Inc.

(313) 282-9250
18550 Allen Road
Post Office Box 2169
Wyandotte, Michigan 48192
MID096963194

GENERATOR WASTE ANALYSIS FORM

LING NAME Combs Industrial Services ADDRESS 340-B W. Trinity Ln CITY Nashville
TE TN 37207 PHONE (615) 228-3901 CONTACT Harvey Coombs

STE GENERATOR EPA I.D. TND 982124273
me: Teksid Aluminum Foundry Inc.
ress: 1635 Old Columbia Rd.
Dickson, TN 37055
ne: (615) 446-8110
ntact Person: Pete McKee

ERAL DESCRIPTION OF WASTE & PROCESS
ste resin from lost form aluminum
sting

Drums X Yards ____ Tons ____
Times Per ____ Week ____ Month ____ Year ____

MAJOR COMPONENTS: 1% (10,000 mg/kg) or greater of waste content. Total major and minor components must add up to 100%

Chemical Name	Concentration		Concentration
ium Nitrate	8%	BIS (2-Ethylhexyl)	9.8%
aldehyde	14%	Phenol	3.0%
phthalene	3.5%	Other	1.7%
ethylene BIS	60%		

PHYSICAL STATE @25C & 1 atm Solid Liquid Gas Explosive Hazard ____
Liquids: 20 % Solid 80 % Liquid
Be pumped? Yes Poured? Yes
No Flash Point >100 pH 6.6
No Oxidizer No Radioactive No
X Corrosive No Infectious No
X Explosive No Inflammable No

ments:
attached MSDS for process materials
compatible with oxidizers, acids
drocarbon odor, No formaldehyde odor

X No This waste is non-hazardous. List all hazardous waste numbers from 40CFR Part 261 or notes ____

I hereby certify that all information submitted in this and all attached documents are complete and that any and all known or suspected hazards have been disclosed.

Generator Signature ____ Title Q.C. Mgr. Date 08/17/92

APPROVAL - CHEM-MET INTERNAL USE ONLY
Profile I.D. ____ Computer will assign this #
HAZMAT HAZTEC UN1993 UN1760 UN1760 UN1993
Profile Name ____ Filed in by DOT Code ____
Code ____ Line Code ____ Lab Acp. ____
A=Approved B=Broker R=Rejected
Chemicals ( ) Initials needed. Detail ( )
CRIPTION: ____
MENTS: ____

TCLP ____ EP TOX ____ TOTAL ____ SEE ATTACHED X

EPA HW NO.	CONTAMINANT	REG. LEVEL (mg/L)	ANALYSIS
D001	Ignitable	>100°F <140°F	>100°F
D002	Corrosive	pH<2 - > 12.5	6.6
D003	Reactive		No
	METAL CHARACTERISTICS:		
D004	Arsenic	5.0	<5.0
D005	Barium	100.0	<100.0
D006	Cadmium	1.0	<1.0
D007	Chromium	5.0	<5.0
D008	Lead	5.0	<5.0
D009	Mercury	0.2	<.02
D010	Selenium	1.0	<1.0
D011	Silver	5.0	<5.0
D012D	Copper	100.0	<100.0
D030	Zinc	500.0	<500.0
	ORGANIC CHARACTERISTICS:		
D012	Endrin	0.02	<.02
D013	Lindane	0.4	<.4
D014	Methoxychlor	10.0	<10.0
D015	Toxaphene	0.5	<.5
D016	2,4-Dichlorophenoxyacetic Acid	10.0	<10.0
D017	2,4,5-TP (Silvex)	1.0	<1.0
D018	Benzene	0.5	<.5
D019	Carbon Tetrachloride	0.5	<.5
D020	Chlordane	0.03	<.03
D021	Chlorobenzene	100.0	<100.0
D022	Chloroform	6.0	<6.0
D023	o-Cresol	200.0	<200.0
D024	m-Cresol	200.0	<200.0
D025	p-Cresol	200.0	<200.0
D026	Cresol	200.0	<200.0
D027	1,4-Dichlorobenzene	7.5	<7.5
D028	1,2-Dichloroethane	0.5	<.5
D029	1,1-Dichloroethylene	0.7	<.7
D030	2,4-Dinitrotoluene	0.13	<.13
D031	Heptachlor	0.008	<.008
D032	Hexachlorobenzene	0.13	<.13
D033	Hexachlorobutadiene	0.5	<.5
D034	Hexachloroethane	3.0	<3.0
D035	Methyl Ethyl Ketone	200.0	<200.0
D036	Nitrobenzene	2.0	<2.0
D037	Pentachlorophenol	100.0	<100.0
D038	Pyridine	5.0	<5.0
D039	Tetrachloroethylene	0.7	<.7
D040	Trichloroethylene	0.5	<.5
D041	2,4,5-Trichlorophenol	400.0	<400.0
D042	2,4,6-Trichlorophenol	2.0	<2.0
D043	Vinyl Chloride	0.2	<.2

Doum L & C
late 1992

ENFORCEMENT ACTION REQUEST
(EAR) MEMO
TEKSID ALUMINUM FOUNDRY
TND 98-212-4273

I. SUMMARY

Teksid began operation in 1987. They make cast aluminum automobile engine heads for Ford, Chrysler and others.

My first involvement with Teksid Aluminum Foundry was a result of a referral from our Division of Underground Storage Tanks (UST). They had investigated a well contamination report from a resident in the vicinity of Teksid and thought that Teksid might be doing something that could have caused the contamination. On January 2, 1992, Doye Rowland and I visited Teksid to investigate the possibility of the well contamination that UST referred to us. Mr. Guiseppe Allievi was our contact person. He accompanied us on a walk through the plant and grounds and answered our questions. We saw a very large pile of waste foundry sand at the back of the plant. There were 46 drums of liquid wastes on an outside paved pad near one of the manufacturing buildings. Mr. Allievi said the waste foundry sand was non-hazardous and that test results were on file to show this. He also said he did not know what was in the drums but he would have them tested and send us the results. We noticed some construction activity which Mr. Allievi explained was a foundry sand recovery unit they plan to use to recycle the waste foundry sand they generate. Doye and I did not discover anything which could be definitely linked to the well contamination. Mr. Allievi agreed to sent us copies of the analysis done on the waste foundry sand and the contents of the 46 drums of unknown liquid.

After a period of nearly 3 months, I had received nothing regarding the 46 drums so I made a follow-up visit on March 25, 1992. (The non-hazardous determination of the waste foundry sand was later verified). I again met with Mr. Allievi to discuss the status of these wastes and the promised copies of the analyses results. Mr. Allievi did not have any analysis results or other information to show what the contents of the drums were. Obviously, without an analysis no hazardous waste determination could be made on the wastes in the 46 drums in question. On March 30, 1992, I sent a notice to Mr. Allievi that Teksid was in violation of the waste determination, recordkeeping and reporting rules.

On June 26, 1992, Doye Rowland and I made another visit to Teksid and again met with Mr. Allievi. Doye discussed the non-hazardous foundry sand and what they planned to do with it. I inquired about the 46 drums, which as far as I knew, the contents was still unknown. Mr. Allievi said they had employed OSCO to take care of the matter and OSCO had collected samples. He said these samples showed only 6 of the drums contained hazardous waste. These 6 drums

were scheduled for disposal the week of July 6, 1992 according to Mr. Allievi. Mr. Allievi also assured me he would write a letter explaining the handling of the drums and other information before he left for Italy on vacation the next week. I did not receive any correspondence from Mr. Allievi.

On August 5, 1992, I sent another notice of violation citing hazardous determination, notification, operating a non-permitted storage facility and labeling violations.

I received a response dated September 1, 1992 to the August NOV from David Rotkiewicz. He stated in the response he was hired by Teksid to oversee their environmental compliance. Mr. Rotkiewicz also commented on some of the circumstances surrounding the 46 drums, other hazardous waste concerns. He suggested we meet to discuss the violations cited in the August 5, 1992 NOV. No documentation such as analysis, waste stream reports or similar information pertaining to the drums of hazardous waste in question has been received at this office as of this date, September 28, 1992.

II. CHRONOLOGY

1. January 2, 1992, Doye Rowland and I made a field visit to Teksid to investigate waste disposal practices at the requested UST. Their request was made in regard to well contamination they were investigating.

2. March 25, 1992, I made a follow up visit to see what action, if any have been taken in regards to the 46 drums of unidentified wastes observed at the January 2, 1992 visit. There had been no action taken toward determining the contents of the drums.

3. March 30, 1992, I sent an NOV citing waste determination, recordkeeping and reporting violations.

4. June 26, 1992, Doye Rowland and I made a follow-up visit to Teksid. I was told by Mr. Allievi that OSCO had sampled the drums and found 6 of them contained hazardous waste. He also stated he would send a letter and other information regarding the status of these drums before leaving on vacation. Mr. Allievi said arrangements had been made with OSCO to dispose of the hazardous waste drums the week of July 6, 1992.

5. August 5, 1992, I sent an NOV to Teksid citing violations of hazardous determination, manifest, notification, storage, and labeling rules.

6. September 4, 1992, I received a letter from David Rotkiewicz, Teksid's new environmental compliance person, responding to my August 5 NOV.

III. VIOLATOR

Teksid Aluminum Foundry, Inc.
1635 Old Columbia Road
Dickson, TN 37055

(615) 446 8110

IV. VIOLATIONS

Teksid Aluminum Foundry, Inc. was found to be in violation of the following sections of the Tennessee Code Annotated, Chapter 46 "Tennessee Hazardous Waste Management Act".

Our investigaiton found that the hazardous waste determination and the reporting requirements for waste generated in 1991 and certain other wastes that were on-site at our January 2, 1992 field visit had not been performed in accordance with regulations.

> 68-46-106. Criteria for determining hazardous waste-Notification regarding wastes generated-Manifest systems-Landfill disposal site.
>
> (3) All generators, transporters, and owners and operators of hazardous waste storage, treatment, and disposal facilities shall utilize a manifest system to assure that such hazardous waste transported off-site is stored, treated, or disposed of in storage, treatment, or disposal facilities in compliance with regulations promulgated pursuant to this part.
>
> Our investigation found that Teksid did not have copies of 2 hazardous waste manifests for shipments made in 1991 which had the signature of the designated facility showing the waste had been received.
>
> 68-46-105. Unlawful acts. It shall be unlawful to:
>
> (4) Store, containerize, label, transport, treat or dispose of hazardous waste or fail to provide information in violation of the rules, regulations, or orders of the Commissioner or board, or in such a manner as to create a public nuisance or a hazard to the public health.

Our investigation found that hazardous waste stored on-site had not been labeled according to regulations and other information required by regulations regarding hazardous waste generation was not provided.

Teksid Aluminum Foundry was found to be in violation of the following rules of Tennessee's Hazardous Waste Regulations:

Rule 1200-1-11-.03(1)(b) requires persons who generate a waste, to determine if that waste is a hazardous waste. (0010)

Rule 1200-1-11-.03(5)(a)3 requires generators of hazardous waste to keep records of any test results, waste analyses, or other determinations made to determine if the waste is a hazardous waste for at least three years from the date that the waste was last sent to an on-site or off-site hazardous or non-hazardous waste treatment, storage, or disposal facility. (0020)

Forty six drums of unknown liquid waste had been accumulated on-site without a hazardous waste determination and appropriate documentation. Teksid Aluminum Foundry had not made the hazardous determination and did not have the required documentation at the on-site investigations made on January 2, 1992 and March 25, 1992. At the June 26, 1992 on-site investigation, Doye Rowland and I were told a hazardous waste determination had been made and 6 of the drums were definitely hazardous wastes. Mr. Allievi, our Teksid contact, said a letter of explanation with copies of the analysis of the waste in question would be mailed to this office within a week. As of this date, September 28, 1992, nothing has been received.

Rule 1200-1-11-.03(2)(d) requires generators to be responsible for maintaining an up-to-date notification file by notifying the Department in writing of significant changes in the information submitted within 30 days after such changes. (0027)

Teksid Aluminum Foundry failed to notify in the required time period of hazardous waste in the drums which are the subject of this enforcement action.

Rule 1200-1-11-.07(1)(b)(ii) prohibits an existing hazardous waste management facility, in Tennessee, from treating, storing, or disposing of hazardous waste unless the owner or operator has a permit under the Tennessee Hazardous Waste Management Act or interim status. (3510)

Teksid Aluminum Foundry has, based on information obtained by on-site investigations, stored at least 6 drums of hazardous waste on-site for a verifiable period beginning January 2, 1992, the date of Doye Rowland and my first on-site investigation to June 26, 1992, the date of our most recent on-site investigation. This exceeds the 90 day time limit by 87 days. Teksid Aluminum is not a permitted hazardous waste storage facility nor did they request an extension of the 90 day accumulation time limit. As of this date, September 28, 1992, no documentation has been received to show that the hazardous waste in question has been shipped to an approved disposal facility.

Rule 1200-1-11-.03(4)(e)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

Rule 1200-1-11-.03(4)(e)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste is being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste". (0525)

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The drums of hazardous waste were not marked with the accumulation dates or the words, "Hazardous Waste".

Rule 1200-1-11-.03(3)

(a) General Requirements

1. A generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a manifest before the waste is transported off-site. The manifest form(s) utilized must be the Uniform Hazardous Waste Manifest established at the Appendix to 40 CFR Part 262 (as published at 49 Federal Register 10500, March 20, 1984, and revised at 50 Federal Register 28742, July 15, 1985, 51 Federal Register 55190, October 1, 1986, and 53 Federal Register 45089, November 8, 1988) which must be completed according to the instructions also established in that Appendix.

(c) Number of Copies - The manifest consists of at least the number of copies which will provide the generator, each transporter, and the owner or operator of the designated facility with one copy each of their records and another copy to be returned to the generator.

Copies of the manifest for 2 shipments of hazardous waste made in 1991 did not have the signature showing the waste was received by the designated facility.

V. PERSONNEL INVOLVED

Tom Yates, Environmental Specialist
DSWM, Nashville Field Office
537 Brick Church Park Drive
Nashville, TN 37243-1550
(615) 741-0654

Doye Rowland, Field Office Manager
DSWM, Nashville Field Office
537 Brick Church Park Drive
Nashville, TN 37243-1550
(615) 741-0654

VI. WITNESSES

Guiseppe Allievi, Quality Control Director
Tekaid Aluminum Foundry, Inc.
1635 Old Columbia Road
Dickson, TN 37055
(615) 446-8110

NFO

22-59

DSWM/NEFC

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
537 BRICK CHURCH PARK DRIVE
NASHVILLE, TENNESSEE 37243-1550

CERTIFIED MAIL P 079 446 828
RETURN RECEIPT REQUESTED

December 22, 1992

Mr. David Rotkiewicz
Teksid Aluminum Foundry, Inc.
1635 Old Columbia Road
Dickson, TN 37055

Re: NOTICE OF VIOLATION
Tennessee Hazardous Waste Management Act

Dear Mr. Rotkiewicz:

This letter confirms the observations and recommendations which were made during the Hazardous Waste generator inspection concerning your facility on December 14, 1992. The attached inspection report details the violations which were noted during the inspection.

These violations should be corrected no later than January 18, 1993. A follow-up inspection will be scheduled to verify that the appropriate corrective action has been taken.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 741-0654.

Sincerely,

Tom Yates

Tom Yates
Division of Solid Waste Management

TY/S1032357/SW-184

cc: DSWM - Central Office, Nashville
U.S.E.P.A., Region IV

INSPECTION REPORT

SITE/OPERATION INSPECTED:

Teksid Aluminum Foundry, Inc.
1635 Old Columbia Road
Dickson, TN 37055
TND-98-212-4273

OWNER/OPERATOR/PRIMARY CONTACT:

Mr. David Rotkiewicz

DATE AND TIME OF INSPECTION:

December 14, 1992
Approximately 9:30 a.m.

REPORT PREPARED BY:

Tom Yates
Division of Solid Waste Management
537 Brick Church Park Drive
Department of Environment and Conservation
Nashville, Tennessee 37243-1550
(615) 741-0654

NAMES AND AFFILIATIONS OF OTHER INSPECTION PARTICIPANTS:

None

PURPOSE OF INSPECTION:

This routine hazardous waste generator inspection was conducted to evaluate Teksid's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

EVALUATION BASIS:

Large Quantity Hazardous Waste generator

FACILITY DESCRIPTION:

Teksid Aluminum Foundry, Inc. manufactures alumunum cylinder heads for Ford, Chrysler, and others in the automotive industry. They began operation in 1987 at the encouragement of a neighboring industry, Wabash

Alloys, who supplies aluminum to Teksid. They have approximately 150 employees.

In their manufacturing process several non-hazardous wastes are generated. These include sand which is used for molds and is presently being recovered and reused. Also, non-hazardous waste oils are generated ans a draft "Spill Prevention Control and Countermeasure Plan" and "Spill Contingency Plan" has been developed for this waste oil. The only hazardous waste reported as generated is waste sulfuric acid. This waste is generated when a silo which is part of their scrubber system is cleaned out. This would normally be done annually. When this waste is removed from the system, it goes directly to the transporter for shipment to an off-site hazardous waste facility. It is estimated that approximately 7000 gallons of this waste is generated when the clean out is done. Ashland Chemical currently used as the transporter and disposal facility for this waste. There is no accumulation or storage of this sulfuric acid waste prior to shipment.

Teksid had, at previous field visits and inspection, accumulated several drums of unknown materials. At this visit, it appeared all of these drums had been shipped off-site for disposal. The area where these drums had been was cleaned up, appeared organized and well managed.

In August of this year, 1992, Teksid hired Mr. David Rotkiewicz to oversee their environmental affairs. There has been significant improvement with regard to hazardous waste concerns sine my previous visit in January, March and June of 1992.

INSPECTION FINDINGS:

(a) The following violations were noted:

Rule 1200-1-11-.03(5)(a)1 requires a generator to keep a copy of each manifest for three years from the date it was signed by himself and the initial transporter or until he receives a completed signed copy from the designated facility which received the waste. The completed signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. (0315)

Manifests of hazardous waste shipments for the 3 years were not available for my review. Only the manifest for 1991 and 1992 were located.

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that all employees who handle or manage hazardous waste successfully complete a program of classroom instruction or on-the-job training that teaches them how to respond effectively to emergencies and to perform their duties in a way that the hazardous waste is being handled properly and safely. (0095)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be directed by a person trained in hazardous waste management procedures and must include instruction which teaches the employees hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. (0105)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program, at a minimum be designed to ensure that employees are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems including where applicable: (1) procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) key parameters for automatic waste feed cut-off systems (if any); (3) communications or alarm systems; (4) response to fires or explosions; (5) response to ground-water contamination incidents; and (6) shutdown of operations. (0107)

Rule 1200-1-11-.03(4)(b)2(v) requires employees to complete the training program required to be provided by generators who temporarily accumulate hazardous waste on-site without requesting a permit or interim status within six months after the date of their employment or assignment to a new position which handles or manages hazardous waste, and until they have completed the training program they are not to work in unsupervised positions. (0110)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (0128)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste. (0135)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains records on current employees who handle or manage hazardous waste while hazardous waste

is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0145)

There were no records or documents to show that employees whose jobs involve hazardous waste activities had received hazardous waste training. Also, there were no documents or records outlining the content or how this training will be done or has been done in the past if that is the case.

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management. (0127)

There were no documents which gave job titles and descriptions for employees whose jobs involve hazardous waste activities.

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the actions employees must take to immediately respond to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the accumulation area(s). (0165)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) will immediately: activate internal alarms or communication systems, where applicable, to notify all other affected employees; and notify appropriate State and local agencies with designated response roles if their help is needed. (0166)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is a release, fire, or explosion the emergency coordinator will immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records and if necessary, by chemical analysis. (0167)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will concurrently assess possible hazards to public health or the environment that may result from a release, fire, or explosion. This assessment must consider both direct and indirect effects of any toxic, iriritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions. (0168)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will immediately notify appropriate local authorities and the Tennessee Emergency Management Agency, if he determines that the facility has had a release, fire, or explosion which could threaten public health or the environment outside the facility, and then be available to help the appropriate officials decide whether local areas should be evacuated. (0169)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, collecting and containing released waste, and removing or isolating containers. (0171)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, if the facility stops operations in response to a fire, explosion, or release, the emergency coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate. (0172)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. (0173)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation

area(s): no waste that may be incompatible with the released material is stored in the accumulation area until clean-up procedures are completed; and all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0174)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have been completed and all emergency equipment has been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulation area(s). (0175)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, within 15 days after the incident, he will submit a written report on the incident to the Commissioner. (0176)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists the names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator and keep this list up-to-date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. (0185)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists all emergency equipment at the accumulation area (such as fire extinguishing systems, spill control equipment, communications and alarm system (internal and external), and decontamination equipment where this equipment is required. This list must be kept up-to-date. (0195)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes the location, a physical description and a brief outline of the capabilities of each item on the list of emergency equipment at the accumulation area [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment], where this equipment is required. (0197)

Rule 1200-1-11-.03(4)(e)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under

Rule 1200-1-11-.07 provided that the generator's contingency plan includes an evacuation plan for employees 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 (in cases where the primary routes could be blocked by releases of hazardous waste or fires). (0205)

No hazardous waste contingency plan containing all the information required by hazardous waste regulations was completed and available for my review at this inspection.

RECOMMENDATIONS AND REMARKS:

A system or procedure to assure that hazardous waste manifests are kept at least 3 years. Every effort should be made to locate or obtain copies of manifest from 1989 and 1990.

A training program for employees whose duties involve hazardous waste activities should be conducted at least annually. A description of the training program content, documentation of who received the training and records of this training should be kept to show it is conducted annually.

A document giving the job title and job description for every job which may involve hazardous activities must be written and available for review.

Teksid's draft "Spill Prevention Control and Countermeasure Plan" (SPCC) addresses some of the information required for the hazardous information required for the hazardous waste contingency plan but is not complete in this regard. The hazardous waste regulations provide that an existing emergency or contingency plan can be used to comply with hazardous waste contingency plan requirements if the existing plan is amended to include hazardous waste provisions.

In the development of the hazardous waste portion of your SPCC plan, keep in mind that it must cover other contingencies besides spills, such as fires and hazardous waste streams must be addressed specifically.

A completed edition that addresses all hazardous contingency concerns and requirements should be available for review whenever an inspection is done.

I appreciate the cooperation and time you gave me during my inspection. If you have any questions about this report, contact me at (615) 741-0654.

Tekid Aumihum
Inspection Report

Signed Tom Yates

Date Dec 22, 1992

TY/S1042356/SW-188

DSWM L&C

TEKSID ALUMINUM FOUNDRY, INC.

SITE ASSESSMENT/INVESTIGATION

DICKSON, TENNESSEE

Prepared for:

WALLER LANSDEN DORTCH & DAVIS
NASHVILLE, TENNESSEE

Prepared by:

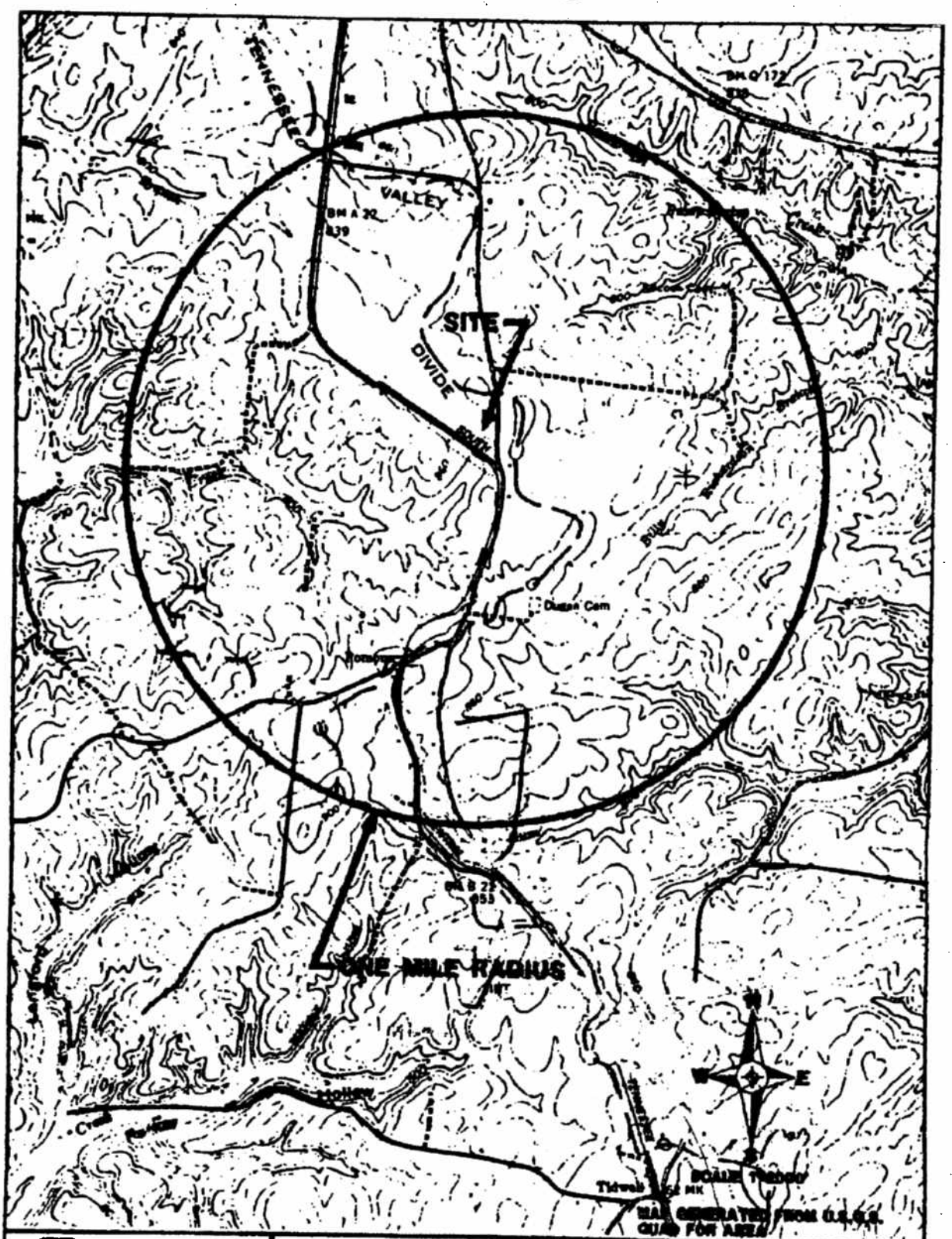
RESOURCE CONSULTANTS, INC.
P. O. Box 1848
Brentwood, Tennessee 37024-1848

January, 1993

ADMINISTRATIVE-CHEMTOX-LABORATORY:
7121 CrossRoads Boulevard
Brentwood, Tennessee 37027
(615) 373-5040

CONSULTING & ENGINEERING:
320 Southgate Court
Brentwood, Tennessee 37027
(615) 370-6250

RESOURCE



TEKSID ALUMINUM FOUNDRY

WASTE STREAM ANALYSIS

WASTE STREAM	pH	FLASH POINT	Pb	TCLP, Pb
Scrubber Water	7.5		0.06	
DAG Separation Tank Wastes			19	<0.1
Mold Cleaning Muriatic Acid Waste				
Heat Treat Quench Water	8.3		0.014	
Berardi Hydromation Roll, Composite			178	<0.1
Berardi #1 Hydromation Roll			134	<0.1
Berardi #2 Hydromation Roll			201	
Berardi #3 Hydromation Roll			138	0.8
Berardi #4 Hydromation Roll			253	0.7
Compressor Room Oil Pit	6.3	>210	<5	
Chip Wringer Cooling Fluid	7.5	180	21	3.8
Chip Wringer Tramp Oil	6.9	182	11	3.7
Basement Waste Collection Tank	7.5	>210	0.17	
Towmotor Maintenance Fluids			<5	
Hydraulic Fluid From Maintenance			<5	
Parts Washer Solvent	6.9	105	<0.5	

DSWM L&C

Tekaid Aluminum Foundry, Inc.

3-19 (*) SAP XC: JTT RDR

MAR 19 1993

March 17, 1993

Mr. Tom Tiesler, Director
Division of Solid Waste Management
Tennessee Department of Environment and Conservation
5th Floor, L & C Tower
401 Church Street
Nashville, TN 37243-1535

RE: August 5, 1992 Hazardous Waste NOV -- November 12, 1992 Hazardous Waste Show Cause Hearing -- Additional Supplemental Information

Dear Mr. Tiesler:

The purpose of this letter is to follow-up our previous submittal of supplemental information (correspondence dated December 4, 1992) regarding the November 12, 1992 Tekaid show cause hearing with the results of our evaluation of process waste streams in our facility. Resource Consultants, Inc. (RCI) was retained to complete the evaluation and a copy of a work plan for an environmental "Site Assessment Investigation" was submitted to you by letter dated February 18, 1993. RCI's waste stream report is presented in Appendix A.

RCI identified all liquid waste streams currently being generated by the various industrial processes at Tekaid and also reviewed and evaluated data obtained from OSCO. As you know, Tekaid had engaged OSCO to characterize the waste materials contained in the 48 unmarked drums found at our site during a January 2, 1992 inspection. A discussion of the results of the evaluations of Tekaid waste streams and the OSCO data follows.

RCI conducted an extensive review and evaluation of waste streams currently being generated at Tekaid to characterize the waste streams and to determine whether or not those waste streams are hazardous as defined in the Resource Conservation and Recovery Act (RCRA) regulations and codified in 40 CFR 261. The review indicates that ten liquid waste streams are currently being generated at Tekaid. These include:

1. Basement wastes
2. Compressor room oil/water pit wastes
3. Cutting oils
4. Oil/water coolants
5. Scrubber water
6. Quench water
7. Dag pit wastewater
8. Parts Cleaner
9. Hydraulic fluids
10. Towmotor maintenance fluids

15

Only one of the streams, the parts cleaner, was determined to be a hazardous waste. Analysis of the parts cleaner indicates that this waste stream is a RCRA ignitable (D001) waste. The cutting oils and oil/water coolant contained total lead (Pb) concentrations of 11 and 21 respectively; however, a TCLP analysis for Pb of these streams indicate that these streams are non-hazardous. The scrubber water, which previously has been managed as a hazardous waste (corrosive, D002), was determined not to be a hazardous waste. Descriptions of these waste streams and analytical results are presented in Appendix B.

OSCO was engaged by Teksid in early 1992 to sample and characterize the materials contained in 46 drums which were stored on site. Information is available to indicate that OSCO sampled and performed various analyses on the materials contained in 17 drums. An evaluation of the available OSCO analytical information reveals that six of the drums contained materials which were determined by OSCO to be hazardous. Of these six drums, the contents of four of the drums were determined to be hazardous for Pb. However, TCLP analyses were not performed and OSCO's determination was based on total assay analyses. The contents of two drums were determined by OSCO to be hazardous because of low flash points. Also, the contents of one drum had a total cadmium concentration of 3.58 mg/L. A TCLP analysis was not conducted, however, and inasmuch as the OSCO waste profile indicates that this material was 100% water, the total analysis is used in lieu of the TCLP testing. This waste, although not identified as such by OSCO, was hazardous for cadmium. A list of the drums sampled and descriptions of the waste materials contained in the drums are presented in Table 1. The OSCO waste profiles are presented in Appendix C. RCI's review and analysis of waste streams currently being generated and analysis of the contents of the 17 drums which were sampled by OSCO indicates that the contents of all but two of the 46 drums are similar to waste streams currently being generated at Teksid. The remaining two drums (to make a total of 46) contained kerosene and water and diesel fuel mixed with sand and were picked up by Comber Industrial Services, Inc. on October 6, 1992.

The wastes identified by OSCO to be hazardous due to their Pb content were described by OSCO as consisting of various maintenance fluids, cleaners and scrubber water. RCI has concluded that none of these waste streams and none of the other waste streams which are presently being generated at Teksid are RCRA hazardous waste due to Pb.

The contents of two drums were identified by OSCO as RCRA ignitable waste (flash point less than 140°F). OSCO described these wastes on their profile sheet as "maintenance clean-out" and "cleaners from maintenance." RCI identified only one stream, a parts cleaner material, that had a flash point less than 140°F. However, this stream was not present at the facility when the subject wastes were accumulated, Teksid only having begun using this material in January 1993. A reasonable explanation for the presence of ignitable waste in the two drums is the probable presence of discarded paints and paint thinners. The contents of one of these drums also contained cadmium. The cadmium probably resulted from paints which were discarded, which supports this explanation.

The 44 drums were eventually shipped off-site for treatment and disposal as an ignitable waste (D001). This was certainly incorrect as the contents of only two of the drums sampled had a flash point less than 140°F. Further, RCI identified only one waste stream with an ignitable flash point and that stream was not present during the generation of the subject wastes. Obviously not all of the drums contained RCRA ignitable wastes. Based on RCI's evaluation, it is also unlikely that the drums contained any wastes which were hazardous for Pb.

To summarize our findings, two things are certain:

1. Not all of the drums contained materials which were ignitable (D001), and
2. None of the waste streams currently being generated at Teksid are characteristically hazardous for Pb. Further, only one current waste stream is ignitable (D001) and that stream was not present at Teksid during generation of the subject wastes.

Please do not hesitate to call me if you have any questions or if you would like to discuss this matter further.

Sincerely,

David Rotkiewicz
Director of Engineering and Maintenance

Enclosures
cc: Mr. James D. Esell
Walter H. Crouch, Esq.
Michael D. Pearigen, Esq.

DSWM L&C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

May 18, 1993

Teksid Aluminum Foundry, Inc.
1635 Old Columbia Road
Dickson, Tennessee 37055

RE: Teksid Aluminum Foundry, Inc., Case Synopsis

On November 20, 1991 the Division of Underground Storage Tanks referred a complaint about Teksid Aluminum Foundry, Inc., TND 98-212-4273, to the Division of Solid Waste Management. The complaint stated that a private citizen observed someone pouring out drums of liquid behind Teksid Aluminum Foundry, Inc., (located on the south side of the Dickson Industrial Park). Contamination was found in the citizen's well water. The Underground Storage Tank Division collected samples at Teksid and did a comparison with the well water. One probable match was determined.

On January 2, 1992 Division representatives visited Teksid Aluminum Foundry, Inc., to investigate the possibility of hazardous waste being generated. Teksid Aluminum Foundry, Inc. casts engine blocks and heads for Ford and Chrysler. They have reported the generation of two (2) hazardous waste streams. 82 kg of sulfuric acid was generated during 1990, but was used on-site and 1250 kg of off specification chemical product (hazardous waste resin), later found to be non hazardous. It was shipped to a site in Alabama as a non hazardous waste. Teksid was listed as a conditionally exempt small quantity generator.

During the investigation and discussion, it was revealed that other non hazardous wastes which Teksid generates, include foundry sands used for molds, waste oil and other liquid resin waste which might sometimes be hazardous. A review of the manifests revealed four (4) shipments of waste oil in 1990 and five (5) in 1991. An inspection of the storage area was conducted where forty six (46) drums of liquid waste, which was identified by a plant representative as resin waste. These drums were not marked or labeled. It appeared that rain water had gotten into some of the drums, and looked as if some spillage had occurred. There were no test results on file for the determination of the waste. The plant representative stated that he was having the waste tested, and would provide the results and disposal arrangements.

A notice of Violation was issued to Teksid on or about March 16, 1992, citing violations of Division Rules for Hazardous Waste Determination and Record Keeping and Reporting.

On June 26, 1992, another inspection was conducted at Teksid by Division representatives. At that time, the forty six (46) drums of waste were still on-site and without analysis or further determination.

On August 5, 1992, a Notice of Violation was issued to the Respondent citing violations of Tennessee Code Annotated 68-212-105 and 106.

On November 12, 1992, a "Show Cause" meeting was conducted between Teksid and the Division of Solid Waste Management. It was revealed that the waste in question was shipped to Chem Met Services, Inc., in Wyandotte, Michigan on August 25, 1992. The Generator Waste Analysis Form supplied by Chem Met Services revealed that the Waste was (D001) ignitable. During the meeting an attempt was made to determine why the waste remained on-site until August 25, 1992. A satisfactory answer was not given. At the conclusion of the meeting it was determined that further enforcement action was warranted.

On December 4, 1992, Teksid submitted additional information which included analysis from OSCO, Inc. During the "Show Cause" meeting, Teksid stated that they had contracted OSCO, Inc. to perform analysis on the waste in question earlier in the year; however, OSCO, Inc. had failed to provide the analysis and would not even return their phone calls.

On December 14, 1992, a Division conducted a Hazardous Waste Generator inspection at the Respondent's facility. On December 22, 1992, a Notice of Violation was issued to the Respondent citing twenty six (26) violations of Division Rules.

A draft Order has been prepared, assessing a penalty of TWENTY TWO THOUSAND SEVEN HUNDRED AND FIFTY DOLLARS ($22,750.00).

D

DSWM
L&C

File (sup copy)
AEB 7-19

98 212 4213

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE FIELD OPERATIONS
NASHVILLE ENVIRONMENTAL FIELD OFFICE
3000 MORGAN ROAD
JOELTON 37080

CERTIFIED MAIL P 857 391 656
RETURN RECEIPT REQUESTED

July 5, 1994

Mr. Don Pfeiffer
Teksid Aluminum Foundry
1635 Old Columbia Road
Dickson, Tennessee 37055

RE: NOTICE OF VIOLATION
Tennessee Hazardous Waste Management Act

Dear Mr. Pfeiffer:

This letter confirms the observations and recommendations which were made during the Generator inspection concerning your facility on June 27, 1994. The attached inspection report details the violations which were noted during the inspection.

These violations should be corrected no later than July 28, 1994. A follow-up inspection will be scheduled to verify that the appropriate corrective action has been taken.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 299-9922.

Sincerely,

Tom Yates

Tom Yates
Division of Solid Waste Management

TDY/0705/jrm/SW-184

Attachment

cc: [redacted]
U.S.E.P.A., Region IV

RECEIVED
JUL 11 1994
Div of
Solid & Hazardous Waste

INSPECTION REPORT

SITE/OPERATION INSPECTED:

Teksid Aluminum Foundry
1635 Old Columbia Road
Dickson, TN 37055
TND 98-212-4273

OWNER/OPERATOR/PRIMARY CONTACT:

Mr. Don Pfeiffer

DATE AND TIME OF INSPECTION:

June 27, 1994
Approximately 9:00 AM

REPORT PREPARED BY:

Tom Yates
Division of Solid Waste Management
3000 Morgan Road
Department of Environment and Conservation
Joelton, Tennessee 37080
(615) 299-9922

NAMES AND AFFILIATIONS OF OTHER INSPECTION PARTICIPANTS:

Mr. T. Gerald Burgess, Teksid
Mr. Don Pfeiffer, Teksid
Mr. Jimmy Chandler

PURPOSE OF INSPECTION:

This routine Hazardous Waste Generator inspection was conducted to evaluate Teksid Aluminum Foundry's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

EVALUATION BASIS:

Large Quantity Hazardous Waste Generator

FACILITY DESCRIPTION:

Teksid Aluminum Foundry, Inc. manufactures aluminum cylinder heads for Ford, Chrysler, and others in the automotive industry. They began operation in 1987 at the encouragement of a neighboring industry, Wabash Alloys, who supplies aluminum to Teksid. They have approximately 426 employees.

Teksid has reported four active hazardous waste streams generated by their manufacturing operations. The major one is sulfuric acid waste that is generated when a silo, which is a part of their scrubber system, is cleaned out. Their waste stream report gives the annual average generation of this waste as 17,992 kg. The other active waste streams reported are waste solvent generated from parts cleaning, waste hydrochloric acid generated from cleaning molds and a small amount of waste paint thinner. Waste cutting oil which is normally non-hazardous was found to be hazardous due to lead when Teksid's most recent shipment was received by Laidlaw Environmental Services of Nashville on May 13, 1994. The amount involved was 5000 gallons and an unmanifested waste report was submitted by Laidlaw. This waste oil is accumulated by Teksid in a 6000 gallon above ground tank with spill containment. This tank was getting close to full at this inspection. Samples had been sent for analysis so a hazardous determination could be made before shipment. The cause of the lead contamination of the oil had not yet been discovered.

Teksid has parts washer units in their general maintenance shop and their forklift maintenance shop. These units stay in use until they are picked. The major hazardous waste stream, sulfuric acid waste, stays in the scrubber system until it is removed for disposal. Waste which is collected in containers is placed in the hazardous waste accumulation area when the containers are full or when no more waste will be added to them. The only hazardous waste in the hazardous waste accumulation area at this inspection was a container of sulfuric acid waste. There was no satellite accumulation being done at the time of this inspection.

A review of hazardous waste manifests show Chemical Conservation Corporation and Eltex Chemical and Supply have been used for the transportation and disposal of hazardous waste.

A large amount of sand waste generated from sand used for molds has accumulated over the years. This waste has been determined by appropriate testing to be non-hazardous. It is currently being used by a contractor for road construction and processed in an on-site recovery/reuse system. Teksid plans to increase the recovery/reuse capacity by installing additional equipment within a year.

Mr. Donald Pfeiffer had only joined Teksid as their Manager of Environmental Affairs two days before this inspection. Consequently, he had not had an opportunity to become familiar with the locations of some of the records and documents subject to review at this inspection. Some records which may exist but could not be located were cited as violations.

Although some previous reports indicate Teksid may have qualified as a small quantity generator, with the addition of lead contaminated oil, the object of the unmanifested waste report, they became a large quantity hazardous waste generator at this inspection.

INSPECTION FINDINGS:

10. Rule 1200-1-11-.03(5)(a)1:

(5) <u>Recordkeeping and Reporting</u>

(a) <u>Recordkeeping</u>

1. A generator must keep a copy of each manifest signed in accordance with 40 CFR 262.23(a) incorporated by reference at subparagraph (3)(a) of this rule for three years or until he receives a signed coy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

DSWM L&C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243 - 1535

Certified Mail P 847 977 838
Return Receipt Requested

March 3, 1995

Mr. Donald Pfeiffer
Manager, Environmental Affairs
Teksid Aluminum Foundry, Inc.
1635 Old Columbia Rd.
Dickson, Tennessee 37055

Re: Consent Order In the Matter of Teksid Aluminum Foundry, Inc.
Case No. 94-D148

Dear Mr. Pfeiffer:

Enclosed please find an Order and Assessment of Civil Penalty issued by the Tennessee Department of Environment and Conservation against Teksid Aluminum Foundry, Inc. This Order amends and supersedes the previous Order of Assessment of Civil Penalty, which was issued on October 20, 1994.

This new Order is hereby issued to reflect changes to the original Order based upon appeal negotiations between the facility and the Tennessee Office of General Counsel. As Teksid has already paid the civil penalty assessed, the receipt of this Consent Order by the facility will close the file on this enforcement case number, 94-D148.

If you or your attorney have any questions, please contact Charles Allen at (615) 532-0295.

Sincerely,

Tom Tiesler
Director, Division of Solid Waste Management

Enclosure

cc: Al Majors, Nashville F.O., DSWM
Kris Lippert, EPA, Region IV

[illegible] there was no copy of the Respondent's contingency plan and emergency procedures available for review. However, the contingency plan may have been maintained at the facility. Further, the inspection revealed that there were no records available to show that hazardous waste training for employees was done on an annual basis, nor were there documents giving job titles and descriptions.

X.

The Division issued a NOV to the Respondent on July 5, 1994. The NOV cited two violations of Division Rule 1200-1-11-.05.

XI.

VIOLATIONS

By failure to have available for review a contingency plan and emergency procedures, the Respondent has violated TCA 68-212-105(3) and (4) and 40 CFR Subpart D, incorporated by reference at Rule 1200-1-11-.03(4)(c)2(iv) which requires Large Quantity Generators to have available a contingency plan and emergency procedures.

XII.

By failure to have available for review records showing that hazardous waste training was conducted annually and failure to maintain documents giving the job titles and descriptions for personnel whose jobs are involved with handling, management, or any kind of hazardous waste activities, the Respondent has violated TCA 68-212-105(3) and (4) and 40 CFR 265.16, incorporated by reference at Rule 1200-1-11-.05(3) which requires Large Quantity Generators to conduct annual training and maintain documents giving the job titles and descriptions of duties for personnel involved with handling, management, or any other kind of activities associated with hazardous waste.

XIII.

In violating the above described rules the Respondent has violated Tennessee Code Annotated Section 68-212-105(3) and (4) states, in part:

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes

1. Organization's full, legal name: TENSID ALUMINUM FOUNDRY INC	EPA identification code: TNC 98-212-4273

2. Mailing address	City	State	Zip code
1635 OLD COLUMBIA RD	DICKSON	TN	37055

3 a. Site address	City	State	Zip code	County name
1635 OLD COLUMBIA RD, DICKSON, TN 37055				Dickson

b. Latitude (degrees, minutes & seconds)	Longitude (degrees, minutes & seconds)
36.0236	87.2000

4. Owner name (may be corporation or company name)	Type	Phone with area code
TENSID ALUMINUM FOUNDRY INC		(615) 446-8110

5. Manager or operator name	Type	Phone with area code
~~GIOVANNI BARBERO~~ Paolo Maccario		(615) 446-8110

6. Principal technical contact	FAX number with area code	Phone with area code
DONALD W PFEIFFER		(615) 446-8110

7. Number of employees	Year operation began	SIC codes (Primary SIC first, etc.)	Job shop
550	198	3365.	Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	DONALD W PFEIFFER	8AM-5PM	(615) 446-8110
b.	DONALD W PFEIFFER	6PM-8AM	(615) 662-1782
c.			
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Paolo Maccario	Plant Manager	2/6/96

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
02-09-1996	22		Yes No X	Yes No X	

12. State-issued	TSDR status	Transporter status

13. Comments

RECEIVED
FEB 09 1996
Div. of
Solid & Hazardous Waste

CS-0969 (Rev. 11/95) RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: TENSTO ALUMINUM FOUNDRY INC
   EPA identification code: TNC 98-[illegible]
2. Waste name. Use standard name from regulations whenever possible: WASTE FLAMMABLE LIQUID
   WASTE STREAM NUMBER: 4
3. Give the years that the waste has been generated, e.g. 1975, 1982-. 1993 - Present
   Date no longer generated. (MM/DD/YY)
   Annual Frequency of generation: Continuous ------ Accidental/ One time Various
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). a
   EPA waste codes. (Primary first; six maximum.) D001,D006,D015,D039,D035,D040
   SIC code for generating process. --~~3565~~-- 3365
5. Physical form code: LIQ-OTHR-[illegible] | % Solid: 1 | % Water: 1 | Vol. to wt. conversion (pounds/gallon): [illegible] | If used for fuel, chlorine content(PPM): 0.0 | BTU per pound: 0.0
6. Generation rates in kilograms. Monthly maximum (kg): 290.0 | Annual average (kg): [illegible] | Maximum stored onsite (kg): 100.0 | Maximum days stored: 30
7. DOT shipping name: WASTE COMBUSTIBLE LIQUID NOS | DOT hazard class: ORM-D 03 | DOT ID code: NA1993
8. Describe the generation process.
   ACTIVITIES.SOLVENT USED FOR PARTS CLEANING DURING MAINTENANCE ACTIVITIES.
9. Chemical Characteristics. pH: NA | Flash point: [illegible] | Reactive code:
   Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume( ), % weight(X), PPM( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A. PETROLEUM NAPTHA	0E	100
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.
    On Site = S01
    Off Site = T63

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Solid & Hazardous Waste

CN-0773 (Rev. 11/95) Form Continues on the Back RDA 2203

4(Y)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: TESTO ALUMINUM FOUNDRY INC
   EPA identification code: TND 98-212-4223

2. Waste name: Use standard name from regulations whenever possible. WASTE COMBUSTIBLE LIQUID
   WASTE STREAM NUMBER: 6

3. Give the years that this waste has been generated, e.g. 1975, 1982, (89) - Present
   Date no longer generated, (MM/DD/YY):
   Annual Frequency of generation: Continuous ___ Accidental/ One time ___ Various (C)

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g)
   EPA waste codes (Primary first; six maximum.): D001
   SIC code for generating process: 3365

5. Physical form code: LIQUID (3) | % Solid: 5 | % Water: 5 | Vol. to wt. conversion (pounds/gallon): 8.200 | If used for fuel, chlorine content (PPM): 0.0 | BTU per pound: 10,000

6. Generation rates in kilograms: Monthly maximum (kg): 25.0 | Annual average (kg): 281.0 | Maximum stored onsite (kg): 75.0 | Maximum days stored: 90

7. Proper shipping name: Waste Flammable Liquid, N.O.S.
   DOT hazard class: 03 Flammable Liquid
   DOT ID code: UN1993

8. Describe the generation process: SPENT PAINT THINNER & SPENT PAINT

9. Chemical Characteristics: pH: NA | Flash point: <140 | Reactive code: NA
   Concentration units: Use PPM for TCLP and EP Toxic Wastes (% volume(), % weight(), PPM()): %

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A. PETROLEUM COMPOUNDS	90	100
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

On Site - S01
Off Site - T50

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Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: RESTO ALUMINUM FOUNDRY INC	EPA identification code: TND 98-212-4273
2. Waste name. Use standard name from regulations whenever possible. OIL/WATER	WASTE STREAM NUMBER: 8
3. Give the years that this waste has been generated, e.g. 1975-1982: 1994 - 1995	Date no longer generated. (MM/DD/YY) 3/8/95
	Annual Frequency of generation: Continuous / Accidental/ One time / Various (C)
4. Circle all appropriate hazard criteria below: Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g) a	EPA waste codes: (Primary first; six maximum.) D008
	SIC code for generating process: 3365

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Liq-Water (2)	2	98	8.300	0.0	0.0

6. Generation rate in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
28,000.0	150,000.0	22,000.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
HAZARDOUS WASTE LIQUID NOS	Misc Haz. Mat	09	NA3082

8. Describe the generation process.

OIL/WATER IS USED AND REUSED IN A MACHINING PROCESS. WHEN THE MATERIAL LOSES IT'S LUBRICATING PROPERTIES, IT IS MANAGED AS A WASTE. ADDITIONALLY, OIL/WATER IS REMOVED FROM ALUMINUM CHIPS AND MANAGED AS A WASTE.

9. Chemical Characteristics: pH	Flash point: >140	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes. % volume(.), % weight(.), PPM(.) (W)

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A. OIL	3	5
B. WATER	95	97
C. LEAD	0PPM	200PPM
D.		
E.		

10. Describe how you have managed or intend to manage this waste through final disposition. Use the Waste Management Method Codes on page 6 of the instructions.

On site: H 001
Off site: H 123, H131, H140, H67

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Solid & Hazardous Waste

CH 0773 (Rev. 1/95) Form Continues on the Back RDA-2203

DSWM L&C

RCRA Inspection Report

Inspector and Author of Report

Tom Yates, Environmental Specialist

Facility Information

Teksid Aluminum Foundry
1635 Old Columbia Road
Dickson Tennessee 37055
TND 98-212-4273
(615) 446-8110

Responsible Official

Donald W. Pfeiffer

Inspection Participants

None

Date and Time of Inspection

March 8, 1996
Approximately 8:00 a.m.

Applicable Regulations

Tennessee's Hazardous Waste Management Regulations (Tennessee Rule Chapter 1200-1-11)

Purpose of Inspection

To conduct an unannounced hazardous waste generator compliance evaluation inspection to determine Teksid's compliance status with Tennessee's Hazardous Waste Management Regulations.

Facility Description

Teksid Aluminum Foundry Incorporated manufactures aluminum cylinder heads for Ford, Clurysler, and others in the automotive industry. They began operation in 1987 at the encouragement of a neighboring industry, Wabash Alloys, who supplies aluminum to Teksid. They have approximately 550 employees. They currently are producing about 8000 cylinder heads per day.

Teksid has reported four active hazardous waste streams generated by their manufacturing operations. The major one is sulfuric acid waste that is generated when a silo, which is a part of their scrubber system, is cleaned out. This waste will be greatly reduced in 1996

due to a treatment processed that has been introduced. The other active waste streams reported are waste solvent generated from parts cleaning, waste hydrochloric acid generated from cleaning molds and a small amount of waste paint thinner. Waste cutting oil which is normally non-hazardous was found to be hazardous due to lead when a Teksid shipment was received by Laidlaw Environmental Services of Nashville on May 13, 1994. This waste has been re-evaluated and was reported as stopped generating March 8, 1995. Waste oil is accumulated by Teksid in a 6000 gallon above ground tank with spill containment. This oil is transferred to drums for shipment, and handled by Laidlaw. About 50 drums per year of used oil is generated from equipment maintenance.

Teksid has parts washer units in their general maintenance shop and their forklift maintenance shop. These units stay in use until they are picked up by Safety Kleen. The other hazardous wastes are collected in containers and immediately taken to the hazardous waste accumulation area. The only hazardous wastes in the hazardous waste accumulation area at this inspection was a container of sulfuric acid waste and one of paint related waste. There was no satellite accumulation being done at the time of this inspection. The point, of hazardous waste generation where satellite containers would be located if the need occurred would be in the mold coating area acid and paint waste is generated.

A review of hazardous waste manifests show Bryson, M.C. Tank, Heitage Environmental Service and Laidlaw have been used for the transportation and disposal of hazardous waste. Annual report data shows that over 1000 kg of hazardous waste was generated in all months in 1995. A special waste approval was granted for waste sand and oil dry materials. This is collected in a 20 yard roll off container and disposed of by Sanifill.

Findings

No violations were found during this inspection.

I appreciate the time and cooperation I was given during my inspection. If there are any questions regarding this report contact Tom Yates at (615) 299-9922.

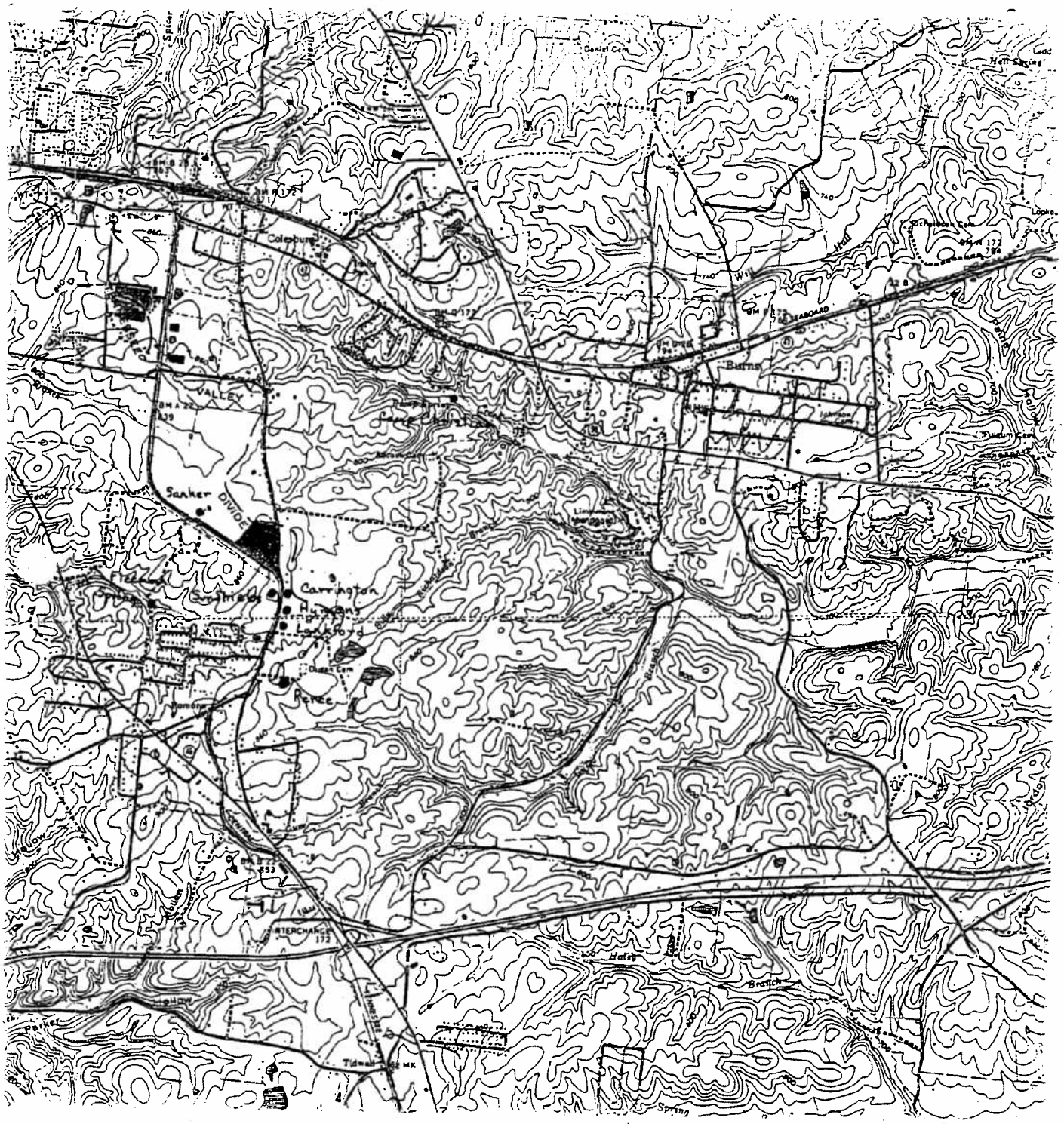
Signed

Tom Yates
Name of Inspector

March 11, 1996
Date

TDY/Tek-188A/db

cc: Solid Waste Management Central Office
U.S.E.P.A. -- Region IV


Coleburg
Burns
VALLEY
Sanker
DIVIDE
Carrington
Lockford
Reece
INTERCHANGE
172
Tidwell
Spring

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1535

NEW

1. Organization's full, legal name			EPA identification code
Tennessee Sewing Machine Attachment Co.,Inc.			TNR000005991
2. Mailing address	**City**	**State**	**Zip code**
P. O. Box 188	White Bluff	Tn	37187-0188
3 a. Site address	**City**	**State**	**Zip code** / **County name**
4600 Highway 70	White Bluff	Tn	37187-0188 / Dickson
b. Latitude (degrees, minutes & seconds)	**Longitude (degrees, minutes & seconds)**		
4. Owner name (may be corporation or company name)		**Type**	**Phone with area code**
Tennessee Sewing Machine Attachment Co.,Inc.		c	615-797-3144
5. Manager or operator name		**Type**	**Phone with area code**
Robert E. Galya, President			615-797-3144
6. Principal technical contact	**FAX number with area code**		**Phone with area code**
Kerry L. Gooch	615-797-4716		615-797-3144
7. Number of employees	**Year operation began**	**SIC codes (Primary SIC first,etc.)**	**Job shop**
47	1977	3559	Yes No

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	Robert Galya	24 hrs	615-446-7311
b.	Thomas Galya	24	615-446-2848
c.	Kerry Gooch	24	615-441-1849
d.			

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No (X).

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
X	President	2-26-98

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
02/27/98	22		Yes (No)	Yes (No)	

12. Date closed	TSDR status	Transporter status

13. Comments

RECEIVED
FEB 27 1998
Div. of
Solid & Hazardous Waste
RDA 2205

CN-0909 (Rev. 11/95)

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

1. Organization's full name at facility: Tennessee Attachment Co., Inc	EPA identification code:
2. Waste name. Use standard name from regulations whenever possible.: Waste Potassium Cyanide	WASTE STREAM NUMBER: 1
3. Give the years that this waste has been generated, e.g. 1975, 1982-: 1998	Date no longer generated. (MM/DD/YY): 2/19/98
Annual Frequency of generation: Continuous, Accidental/ One time, Various	
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). E F	EPA waste codes. (Primary first; six maximum.): P098, D003
SIC code for generating process.: 3559	

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Granular Solid 9	100	0	9	0	0

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
82 Kg	82 Kg	82 Kg	7

7. DOT shipping name	DOT hazard class	DOT ID code
Waste Potassium Cyanide	6.1	UN1680

8. Describe the generation process.
Unused Potassium Cyanide ~~that was~~

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume(X), % weight( ), PPM( )
N/A	N/A	1	

Hazardous constituents. Give range of values at right.	lower value	upper value
A. Potassium Cyanide		100
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*. Use the Waste Management Method Codes on page 6 of the instructions.

S01/T~~25~~27/D81

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FEB 27 1998
Div. of Solid & Hazardous Waste

CN-0773 (Rev. 11/95) Form Continues on the Back RDA 2203

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, TN 37243-1535

Waste Generator Notification Fee

Effective December 28, 1992, Rule 1200-1-11-.08(2) of the Tennessee Hazardous Waste Management Fee Regulations requires new generators to submit a one-time application fee of $50.00 along with their first-time notification. The fee must be received by the Department before an EPA ID Number can be assigned and the notification reviewed.

Please enter information requested below and return this letter to the above address along with your application fee to insure proper processing. NOTICE: Make your check payable to *Treasurer, State of Tennessee*.

NAME	Tennessee Sewing Machine Attachment Company, Inc.
MAILING ADDRESS	P. O. Box 188
CITY, STATE AND ZIP CODE	White Bluff, Tn 37187-0188
SITE LOCATION	
CONTACT NAME	Kerry Gooch
PHONE NUMBER WITH AREA CODE	615-797-3144
AMOUNT ENCLOSED: $	50.00

For DEPARTMENT use only:

LOG ID CODE	STAFF INITIALS	NEWLY ASSIGNED EPA ID CODE
208C	DBW	TNR 00 000 599

CD NO.	DATE RECEIVED	AMOUNT	RECEIPT NO.	COMMENTS
A5u2128		50.00	AC6888	

RECEIVED
FEB 27 1998
Div. of
Solid & Hazardous Waste

CN-1033 (Rev. 11/95)

RDA 3203

DSWM
L&C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243 - 1535

March 9, 1998

Tennessee Sewing Machine Attachment Co., Inc.
ATTN: KERRY L. Gooch
P.O. Box 188
White Bluff, TN. 37187-0188

Re: EPA ID Number
Site Location: 4600 Highway 70
White Bluff, TN. 37187-0188

Dear Mr. Gooch:

This letter will serve as official notice of your EPA ID Number TNR 00-000-5991 which should be used on all reports and correspondence submitted to the Department.

The EPA ID Number is assigned to this specific physical location. Should you ever relocate, you would be required to apply for a new EPA ID Number for that location.

PLEASE NOTE: If you generate greater than 100 kilograms (220 pounds) in any month, you must file an Annual Report with the Division of Solid Waste Management and pay a Generator Fee by the following March 1.

If you have further questions about this subject please contact Dennis Woodson at (615) 532-0487.

Sincerely,

Barbara Donohoe

for Bobby W. Morrison, Manager
Waste Activity Audit
Division of Solid Waste Management

BWM/DW/jk/gooch

cc: Nashville Field Office

HAZARDOUS WASTE FACILITY INSPECTION

SITE INSPECTED

Tennsco Corporation
Plant I - East Broad Street
P. O. Box 606
Dickson, Tennessee 37055
TND 004035853

PRIMARY CONTACT

Mickey Self

INSPECTION DATE AND TIME

February 15, 1985
Starting at 9:00 a.m.

INSPECTOR AND REPORTER

Bob Gardner
701 Broadway, B-30
Nashville, Tennessee 37219-5403
742-6649

PURPOSE OF INSPECTION

This routine unannounced full inspection was conducted to evaluate Tennsco's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

EVALUATION BASIS

Generator of hazardous waste - Rule 1200-1-11-.03

FACILITY DESCRIPTION

One hazardous waste is generated at this location - Flammable Liquid D001 consisting of bad paint, and paint equipment flush solvent. All waste is accumulated in 55-gallon drums and pumped into the transport tanker. Waste paint sludge from a high solids paint line has been evaluated and found to be non-hazardous. This waste is also sent to a secure landfill for disposal only because it can not be suitably handled at the local sanitary landfill.

MANIFEST SUMMARY

Date	Quantity	Date	Quantity
1-07-83	2310 Gallon	2-01-84	4000 Gallon
2-16-83	1815	2-06-84	3520
3-29-83	1705	2-10-84	1650
5-27-83	1320	3-29-84	2860
6-30-83	1595	6-12-84	2145
9-20-83	4725	8-23-84	5000
10-21-83	2695	10-20-84	3650
2-04-85	4600		

	1983	1984
Total Quantity Shipped, Kg.	55,000	65,000
Monthly Generation Rate, Kg.	5,300	4,900

Specific Gravity = 0.9, Assumed 55 gallon per drum.

Transporter - Resource Recycling Tech. - TND 081455891
Facility - Chem-Fuel - TND 000737510

COMMENTS

At the time of the last hazardous waste inspection on August 23, 1982, Tennsco had two plants located about two miles apart in Dickson with both generating a hazardous waste. Only the Broad Street plant had been assigned an identification number (TND 004035853). Wastes from both plants have been manifested under this I.D. number. Tennsco has been asked to submit a generator notification for the second plant located in the old Winner Boat facility.

INSPECTION FINDINGS

The following violations of Rule 1200-1-11-.03 were found at the time of inspection:

1. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program, at a minimum be designed to ensure that employees are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems including where applicable: (1) procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) key parameters for automatic waste feed cut-off systems (if any); (3) communications or alarm systems; (4) response to fires or explosions; (5) response to ground-water contamination incidents; and (6) shutdown of operations. (0107)

2. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)

3. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)

4. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management. (0127)

5. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (012B)

6. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste. (0135)

7. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains training records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0145)

8. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator designs his contingency plan to minimize hazards to public health or the environment from fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. (0157)

9. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the actions employees must take to immediately respond to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the accumulation area(s). (0165)

10. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate a hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) will immediately: activate internal alarms or communication systems, where applicable, to notify all other affected employees; and notify appropriate State or local agencies with designated response roles if their help is needed. (0166)

11. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is a release, fire, or explosion the emergency coordinator will immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records and if necessary, by chemical analysis. (0167)

12. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will concurrently assess possible hazards to public health or the environment that may result from a release, fire, or explosion. The assessment must consider both direct and indirect effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions. (0168)

13. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will immediately notify appropriate local authorities and the Tennessee Emergency Management Agency, if he determines that the facility has had a release, fire, or explosion which could threaten public health or the environment outside the facility, and then be available to help the appropriate officials decide whether local areas should be evacuated. (0169)

14. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable collecting and containing released waste, and removing or isolating containers. (0171)

15. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. (0173)

16. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation area(s): no waste that may be incompatible with the released material is stored in the accumulation area until clean-up procedures are completed; and all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0174)

17. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have been completed and all emergency equipment has been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulation area(s). (0175)

18. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator's will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, within 15 days after the incident, he will submit a written report on the incident to Commissioner. (0176)

19. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, as appropriate for the type of waste handled at the accumulation area and the potential need for the services of these organizations. (0177)

20. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate a hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists the names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator and keep this list up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. (0185) The office phone number has not been listed.

21. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes the location, a physical description and a brief outline of the capabilities of each item on the list of emergency equipment at the accumulation area (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required. (0197)

22. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes an evacuation plan for employees 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 (in cases where the primary routes could be blocked by releases of hazardous waste or fires). (0205)

23. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains a copy of the contingency plan and all revisions to the plan and submits them to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. (0207)

24. Rule 1200-1-11-.03(5)(b)1 requires a generator to submit an annual report to the Department by March 1 for the preceding calendar year. (0432) Reports have not been received for 1982 or 1983.

25. Rule 1200-1-11-.03(5)(b)1 requires a generator who ships his hazardous waste off-site to submit an annual report on forms provided by the Department and the form completed according to the instructions accompanying it. (0435)

26. Rule 1200-1-11-.03(4) requires each generator who ships hazardous waste off-site for storage, treatment, or disposal to submit along with the annual report an annual maintenance fee of 100 dollars ($100). (0437)

27. Rule 1200-1-11-.03(4)(b)1(i) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator, if the waste is stored in containers, ensures that containers holding hazardous waste are always kept closed during storage, except when it is necessary to add or remove waste. (0447)

28. Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

29. Rule 1200-1-11-.03(4)(b)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste is being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste". (0525)

30. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator accumulates the hazardous waste in a manner which will minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten public health or the environment. (0535) Area where waste is stored in drums was observed to be very cluttered making proper management difficult.

31. Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the accumulation area(s) is equipped with a devise, such as a telephone (immediately available at the scene of accumulation) or a hand held two way radio, capable of summoning emergency assistance from local police departments, fire departments, or State and local emergency response teams, unless none of the hazards posed by the waste accumulated warrent this kind of equipment. (0555) The closest phone is approximately 200 feet from the storage area and is judged to be too remote for calling in assistance.

32. Rule 1200-1-11-.93(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains adequate aisle space to allow the unobstructed movement of employees, fire protection equipment, spill control equipment, and decontamination equipment in any emergency, unless aisle space is not needed for any of these purposes.

SIGNED: Bob Gardner
Bob Gardner

DATE: 2/26/85

DSWM L&C

Hazardous Waste Facility Description

Tennessee Department of Public Health, Division of Solid Waste Management,
Cordell Hull Building, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility. Tennsco Corp. Plant 1	EPA identification code TND-403-5853

2. Mailing address	City	State abbrev.	ZIP code
P.O. Box 606	Dickson	TN	37055

3a. Does your organization generate waste which is determined to be hazardous by Rule 1200-1-11-.02(1)(b)? Yes (Yes circled) No	b. Does your facility treat, store, or dispose of hazardous waste subject to permitting rules of 1200-1-11-.07(1)(b)? Yes No (No circled)
4. Do you request a partial exemption because you are a small generator of hazardous waste as defined in rule 1200-1-11-.02(1)(e)?	Yes No (No circled)

5. Facility physical location or address.	6. Facility county name
E Broad Street, Dickson , Tennessee 37055	Dickson

7. Owner name	Phone with area code
Lester D. Speyer	615-446-8000

8. Manager or operator name	Phone with area code
Jerry Estes	615-446-8000

9. Principal technical contact	Phone with area code
Mickey B. Self or Stuart Speyer	615-446-8000

10. Number of employees	Year oper. began	SIC codes (Primary SIC first, etc.)	Job shop
204	1963	2522	Yes No

11. Emergency contacts for 24 hours per day and 7 days per week.

	Name	Time period covered	Phone with area code
a.	Jerry Estes	anytime	615-446-2511
b.	Kerry Dysinger	anytime	615-446-3380
c.	Richard Manley	anytime	615-446-6562
	Mickey Self	anytime	615-789-5618

12. Current environmental permits for air water, solid waste and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit.

994298P L 994301P

13. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of owner or manager	Title	Date

Below is for Public Health use only.	14. Date Received	County Code	Priority	Major Gener.	Major TSDF
	8-12-85	22	L		

15. Public Health comments.

TH-2019 (SWM 9/82 Rev.)

Hazardous Waste Description

Tennessee Department of Public Health, Division of Solid Waste Management.
Cordell Hull Building, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility: Tennsco Corporation Plant #1
EPA identification code: TND004035853

2. Waste name. Use standard name from regulations whenever possible.: Flammable Liquid
Waste name #: (1)
EPA waste code: D001

3. Is this waste listed in the regulations in Rule 1200-1-11-.02(4)? Yes (No)

4. Does this waste qualify as hazardous under the criteria of Rule 1200-1-11-.02(3)? (Yes) No

5. Is this waste exempted from certain regulations according to Rule 1200-1-11-.02(1)(d)2(ii), for examples, fly ash, drilling fluids, mining wastes, and cement kiln dust? Yes (No)

6. Give the years that this waste has been generated or processed by a treatment, storage, or disposal facility. Since 1963 22 years

7. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.
Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Otherwise toxic (f). codes A

8. Physical form: Liquid
Percent solid: 75%
3-75

9. Generation or handling rate in kilograms (KG).
Monthly Average: 364
Monthly Maximum: 728
Annual average: 4,368
Frequency of generation: Continuous Seasonal Various

10. Amount stored (Ave. KG): 2,184
Days stored (ave.): 90
Transportation mode: Rail, Water, Highway, Air, Other
- H

DOT shipping name: Flammable Liquid
DOT hazard class: ~~UN1993~~
DOT ID. code: ~~D001~~ UN 1993

11. Describe generation process.

Bad paint & paint thinner mixed for paint equipment clean-up & paint sludge from water wash booths.

Lines 12/15 on back. Below is for department use only.

16. Complete? Yes (No) | Test results? Yes (No) | Reasonable? (Yes) No | Follow-up (Yes) No | Dot Haz. Class 07 | Curr. Gen. (Yes) No | Initials RLG

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8)
Status Code: 6
Date Received: 8-13-85

17. Public Health Comments.

PH-2022 (SWM 9/82 Rev.)

57800 DSWM Lic

FY 85-86 Remedial Action (SUPERFUND) Fee Worksheet

the Hazardous Waste Management program of the Department of Health and Environment.
ision of Fiscal Services, 6-620 Cordell Hull Building, Nashville, TN 37219.

EPA ID CODE TND 000003-5853 Yes
MICKEY REIS
TENNECO CORP PLANT 1
PO BOX 60A
DICKSON TN 37055

Please complete and return to the above address. Please correct any incorrect information on the label. See the instruction pages and regulations for detailed information for completing this form. For technical assistance, call (615) 741-6287.

1. Enter the total amount of hazardous wastes generated during the year of Jan. 1, 1984 to Dec. 31, 1984, or, if no hazardous wastes were generated in the year of 1984, enter the amount of hazardous wastes generated from January 1 through April 30, 1985. Enter to the right the year the wastes were generated as 1984 or 1985.	110,054 kg 1984 year	
2a. Waste amount from fossil fuel combustion.	kg	
b. Ore mining waste amount.	kg	
c. Applicable energy associated waste amount.	kg	
Cement kiln dust waste amount.	kg	
e. Wastewater treatment plant influent waste amount. (See permit requirements.)	kg	
f. Public Owned Treatment Works (POTW) sludge waste amount.	kg	
g. Municipal incineration waste amount.	kg	
h. Waste excluded by petition amount.	kg	
i. Transportation spill waste amount.	kg	
j. Hazardous wastes no longer generated after April 30, 1985.	kg	
k. Hazardous wastes produced from on-site treatment unless the original waste was excluded.	kg	
l. Inactive site clean-up waste amount.	kg	
m. Enter the sum of lines 2a - 2l to the right	kg	
3. Enter the difference between line 1 and line 2(m).	110,054 kg	
4. If 1984 was entered in line 1, enter the amount of line 3 into line 4. If 1985 was entered in line 1, compute an estimated annual total amount of hazardous wastes generated by dividing line 3 by the number of months wastes were generated in the first four months of 1985 and multiplying by 12. If an alternative estimation method is used, check and attach documentation: ( ).	110,054 kg	
5. Enter the correct fee from Table 1 which is located at the end of this form. Use the waste amount from line 4 above to determine the fee.	$ 4000.00	
6. If an acutely hazardous waste was generated from January 1, 1984 through April 30, 1985 and shipped off-site for disposal, enter $500.00. If this waste was not landfilled, check and attach documentation: ( ).	$	

PH-2397, (SWM rev. 3/85)

Form is continued on the back.

7x165 / 8-12-85 / 4,847.00 / 28761

22-31

JUL 03 1986

7-7 to met

DSWM L&C

Certified Mail
P 673 133 441
Return Receipt Requested

TMA7-9

file

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
CUSTOMS HOUSE
701 BROADWAY
NASHVILLE, TENNESSEE 37219-5403

July 2, 1986

Mr. Mickey Self
Tennsco Corportaion
P.O. Box 606
Dickson, TN 37055
TND 004035853

RE: Hazardous waste generator facility inspection
NOTICE OF VIOLATION

Dear Mr. Self:

On June 19, 1986, a routine, unannounced hazardous waste generator inspection was conducted at Tennsco in order to determine this facility's compliance with applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee. Violations noted during the inspection include the following:

Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

Rule 1200-1-11-.03 (4)(b)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste in being accumulated on-site, each container and tank is labeled or marked clearly wiht the words, "Hazardous Waste". (0525)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.7 provided that the generator ensures that the accumulation area(s) is equipped with portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas or dry chemical), spill control equipment, and decontamination equipment, unless none of the hazards posed by the waste accumulated warrent this kind of equipment. (0565)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator tests and Maintains all communications or alarm systems, fire protection equipment, where required, as necessary to assure it proper operation in time of emergnecy. (0585)

Rule 1200-1-11-.03(2)(d) requires generators to be responsible for maintaining an up-to-date notification file by notifying the Department in writing of significant changes in the information submitted within 30 days after such changes. (0027)

Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator inspects the area where ocntainers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. (0035)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)

Rule 1200-1-11-.03(4)(b)(iv) allows a genreator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate ahzarodus waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management (0127)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (0128)

Rule 1200-1-11-.03(4)(b)(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the gneerator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste (0135)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains training records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked at the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0145)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, collecting and containing released waste, and removing or isolating containers. (0171)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, if the facility stops operations in response to a fire, explosion, or release, the emergency coordinator will monitor for leaks, pressure buildup, gas generation,or ruptures in valves, pipes, or other equipment, wherever this is appropriate. (0172)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. (0173)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation area(s): no waste that may be incompatible with the released material is stored in the accumulation area until contingency plan is cleaned and is fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0174)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have bee completed and all emergency equipment had been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulatin area(s). (0175)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator's will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, within 15 days after the incident, he will submit a written report on the incident to Commissioner. (0176)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, as appropriate for the type of waste handled at the accumulation area and the potential need for the services of these organizations. (0177)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes the location, a physical description and a breif outline of the capabilities of each item on the list of emergency equipment at the accumulation area (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external and decontamination equipment), where this equipment is required. (0197)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.78 provided that the generator's contingency plan includes an evacuation plan for employees 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 (in cases where the primary routes could be blocked by releases of hazardous waste or fires). (0205)

As you can see, most of the violations noted are of a documentation nature and should be relatively easy to correct. A follow-up inspection will be conducted on August 12, 1986 to determine if these violations have been corrected.

Enclosed with this letter is a blank Hazardous Waste Stream Description sheet. Your previously submitted Hazardous Waste Description (dated 3-27-85 and signed by you) indicated a monthly maximum generation rate of 728 Kg, which is highly inaccurate according to the amount of waste shipped off-site from this facility as shown on your 1985 (and including through 6-2-86) manifests. Please recalculate your generation rate, complete this form, and return it to me at the address shown on the form.

I would like to thank you for your cooperation shown during the inspection during what was an obviously hectic day for you. Should you have any questions, or if I can be of any assistance to you, please feel free to call me at 742-6649.

Sincerely,

Bob Vaughan

Bob Vaughan
DIVISION OF SOLID WASTE MANAGEMENT

BV/kdk

Hazardous Waste Notification

Tennessee Department of Health and Environment, Division of Solid Waste Management. JAN
Customs House - Fourth Floor, 701 Broadway, Nashville, Tennessee 37219-5403

1. Organization's full name at facility. TENNSCO CORPORATION (PLANT 1)			EPA identification code TND 004035853
2. Mailing address P.O. BOX 606	City DICKSON	State abbrev. TN	ZIP code 37055
3. Facility physical location or address. EAST BROAD ST			Facility county name DICKSON
4. Owner name LESTER D. SPEYER			Phone with area code (615) 446 8000
5. Manager or operator name JERRY ESTES			Phone with area code (615) 446 8000
6. Principal technical contact MICKEY SELF			Phone with area code (615) 446 8000
7. Number of employees 151	Date operation began 1963	SIC codes (Primary SIC first, etc.) 2522	Job shop Yes (No)

8. Emergency contacts for 24 hours per day and 7 days per week.

	Name	Time period covered	Phone with area code
a.	JERRY ESTES	ALL ~~TIMES~~	(615) 446 2511
b.	KERRY DYSINGER	" —	(615) 446 3380
c.	RICHARD MANLEY	" —	(615) 446 6562
d.	MICKEY SELF	" —	(615) 789 5618

9. Current environmental permits for air water, solid waste and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit.

994298P & 994301P

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Mickey B Self	PURCHASING AGENT	7/17/86

Below is for Department use only.	11. Date received	County code	Priority	Generator	Small generator	Major generator
	1/16/87	22		Y	N	

12. Date closed	Date regulated	Date deregulated

13. Comments

PH-2019A (SWI 12/85 Rev.)

Hazardous Waste Stream Description

Tennessee Department of Health and Environment, Division of Solid Waste Management
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility: TENNSCO CORP. (PLANT 1)
EPA identification code: TND 004035853

2. Waste name. Use standard name from regulations whenever possible: FLUSH SOLVENT
Waste Stream ID: 1
EPA waste code: F005

3. Give the years that this waste has been generated, e.g. 1975, 1982-1984, June 1985-
- SINCE 1963 -

4. Hazard criteria. See rule 1200-1-11-.02(3) and (4). Circle the appropriate criteria below.
Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Otherwise toxic (f).

5. Physical form: LIQUID
Percent solid: APPROXIMATELY 10% 5-10

6. Generation rate in kilograms (KG). Supply both rates.
Monthly Maximum: 2400
Annual average: 20,700
Volume to weight conversion (pounds per gallon): 8.15

7. Maximum amount stored in kilograms: 4800
Maximum days stored: 90
Frequency of generation: Continuous Accidental Various

8. DOT shipping name:
DOT hazard class:
DOT ID. code:

9. Describe generation process.
A SOLVENT MIXTURE OF 75% TOLUENE / 25% METHYL ISOBUTYL KETONE IS USED TO FLUSH AND CLEAN PAINT EQUIPMENT. ADDITIONALLY SCRAP PAINT-OFF-SPEC- IS COLLECTED WITH THE FLUSH SOLVENT.

Lines 10/14 on back. Below is for department use only.

15. Complete?	Test results?	Reasonable?	Follow-up	Dot Haz. Class	Initials
Yes No	Yes No	Yes No	Yes No	Ø7	MAH

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8)
Status Code: 6
Date Received: 1/16/87

16. Comments.

PH-2022 (SWM 12/85 Rev.)

JAN 28 1987 DSWM L&C

Hazardous Waste Notification Summary JAN 09, 1987

See full instructions for form PH-2019 for additional information and codes.

1. Organization's name
TENNSCO CORPORATION (PLANT 1)
: EPA ID CODE
TND 00-403-5853

2. Mailing address
P.O. BOX 606
: City
DICKSON
: State : ZIP code
TN 37055

3. Physical location or address
EAST BROAD ST
: County name
DICKSON

4. Owner name
LESTER D SPEYER
: Phone
(615) 446-8000

5. MANAGER OR operator name
JERRY ESTES
: Phone
(615) 446-8000

6. Principal technical contact
MICKEY SELF
: Phone
(615) 446-8000

7. Number of employees : Year began : SIC codes : Job shop

Number of employees	Year began	SIC codes	Job shop
151	1963	2522, , ,	NO

8. Emergency contacts for 24hours per day and 7 days per week

Name	Time period covered	Phone
A JERRY ESTES	HOME	(615)446-2511
B KERRY DYSINGER	HOME	(615)446-3380
C RICHARD MANLEY	HOME	(615)446-6562
D MICKEY SELF	HOME	(615)789-5618

9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.
NONE 994298P AND 994301P 994298P L 994301P 994298P & 994301P 994298P & 994301P

10. I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date
Mickey Self Purchasing Agent 1-28-87

Below is for Department use only.

11. Date rcvd : County : Priority : Generator : Small Gen. : Special status

Date rcvd	County	Priority	Generator	Small Gen.	Special status
012887		73	Yes No	Yes No	

12. Date closed : Date regulated : Date deregulated

13. Comments

DSLM JAN 28 1987 L&C

Full instructions for form PH-2022 for additional information and codes.

1. Organization's name.
TENNSCO CORPORATION (PLANT 1)

: EPA ID CODE
TXD 00-403-5853

2. Waste name.
FLUSH SOLVENT

: Waste stream ID
1

3. Give years this waste has been generated.
1963

: Frequency of generation
CONTINUOUS

4. Mark all appropriate hazard criteria below.
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES: AF

: EPA waste codes.
F005

5. Physical form
LIQUID, OTHER BASED

: Percent solid
10% ~~40.0~~

: Volume to wt. (lb/gal)
8.15

6. Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
2400 ~~1,600~~	20,700 ~~10,300~~	4,800	90

7. DOT shipping name
WASTE FLAMMABLE LIQUID

: DOT hazard class
FLAMMABLE LIQUID

: DOT ID code
1993

8. Describe generation process.
BAD PAINT & PAINT THINNER MIXED FOR PAINT EQUIPMENT CLEAN- UP. A SOLVENT MIXTURE OF 75% TOLUENE/25% METHYL ISOBUTYL KETONE IS USED TO FLUSH AND CLEAN PAINTING EQUIPMENT. THE WASTE MAY BE APPROXIMATELY 80% SOLVENT MIXTURE AND 20% PAINT.

*** ANNUAL REPORT SECTION *** Lines 9-11.

9. If the waste was shipped off-site, also submit Annual Shipping Report for Hazardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "R" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes
1986	8965	~300 Kg	~300 Kg	S01,T50,

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods. SEGREGATING THIS WASTE AND NON-HAZARDOUS PAINT SLUDGE.

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

Hazardous Waste Stream Report - Page 1 of 2 JAN 28 1987 09, 1987

Full instructions for form PH-2022 for additional information and codes.

1. Organization's name.
TEXMSCO CORPORATION (PLANT 2E3)

: EPA ID CODE
TXD 98-084-5390

2. Waste name.
FLUSH SOLVENT

: Waste stream ID
1

3. Give years this waste has been generated.
1980

: Frequency of generation
CONTINUOUS

4. Mark all appropriate hazard criteria below.
Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f)
CODES: AF

: EPA waste codes.
F005

5. Physical form
LIQUID, OTHER BASED

: Percent solid
18 % ~~80.0~~

: Volume to wt. ~~(lb/gal)~~
8.15 ~~8~~

6. Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
~~2000~~ ~~5,000~~	68,800 ~~46,000~~	17800 ~~17,400~~	90

DOT shipping name
WASTE FLAMMABLE LIQUID

: DOT hazard class
FLAMMABLE LIQUID

: DOT ID code
1993

8. Describe generation process.
A SOLVENT MIXTURE OF 75% TOLUENE /25% METHYL ISOBUTYL KETONE IS USED TO FLUSH AND CLEAN PAINTING EQUIPMENT. THE WASTE MAY BE APPROXIMATELY 80% SOLVENT MIXTURE AND 20% PAINT

9. ANNUAL REPORT SECTION ~~xxx~~ Lines 9-11.
If the waste was shipped off-site, also submit Annual Shipping Report for Hazardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report year	Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes
1986	26,200	~200 Kg	~220 Kg	S01, T54, D80

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

JAN 28 1987

Hazardous Waste Stream Report - Page 2 of 2 JAN 09, 1987

full instructions for form PH-2022 for additional information and codes.

Organization's name. : EPA ID CODE
TENNSCO CORPORATION (PLANT 2E3) TND 98-084-5390

Waste name. * Waste stream ID
FLUSH SOLVENT 1

12. Chemical Characteristics. : Concentration units. For EP toxic
pH : Flash point : wastes, indicate PPM.
17C

Major and hazardous consituents. : lower : upper
A TOLUENE 60 75 :
B METHYL ISOBUTYL KETONE 20 25 :

13. Describe handling methods with codes from instructions.

Treatment codes	Storage codes	Disposal codes	Location
T54	S01	D99	OFF-SITE

14. Identify EPA ID code all transporter and TSDF operators involved in handling this waste.
~~TND000002904~~ ~~[illegible]~~ ALD094476793

15. I certify that this information is true, accurate and complete.
SIGNATURE: (Generator or authorized representative), title and date.

Michael R. Self Purchasing Agent 1-23-87

Below is for department use only.

Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
012287	Yes No	Yes No	Yes No	Yes No	MAH

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A). 6

17. Comments.

THE ONLY WASTE STREAM NOW GENERATED IS FLUSH SOLVENT MIXED WITH SCRAP PAINT. - Statement by company

 JAN 28 JAN 09, 1987

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name.
TENNSCO CORPORATION (PLANT 2&3)

NON-HAZARDOUS

: EPA ID CODE
TND 98-084-5390

2. Waste name.
PAINT SLUDGE

: Waste stream ID
2

3. Give years this waste has been generated.
1980

: Frequency of generation
CONTINUOUS

4. Mark all appropriate hazard criteria below.
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES: a #

: EPA waste codes.
N000

5. Physical form : Percent solid : Volume to wt. (lb/gal)
LIQUID, OTHER BASED 100.0 10

6. Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
813	9,750	2,439	90

7. DOT shipping name : DOT hazard class : DOT ID code
PAINT SLUDGE ~~FLAMMABLE LIQUID~~ 9189
#

. Describe generation process.
PAINT SLUDGE FROM WATER WASH TOUCH-UP PAINT BOOTHS. *THIS WASTE IS NOT A HAZARDOUS WASTE. IT PASSES BOTH THE IGNITIBILITY TEST AND EP TOXICITY TEST. THE DSWM HAS ISSUED A "SPECIAL WASTE DISPOSAL" APPROVAL LETTER FOR PLACING IN A LOCAL SANITARY LANDFILL.

*** ANNUAL REPORT SECTION *** Lines 9-11.

9. If the waste was shipped off-site, also submit Annual Shipping Report for Hazardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report Year	Amount generated during year (Kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

Full instructions for form PH-2022 for additional information and codes.

Organization's name. : EPA ID CODE
VENRSCO CORPORATION (PLANT 263) TXD 98-084-5390

Waste name. * Waste stream ID
PAINT SLUDGE 2

Chemical Characteristics. : Concentration units. For EP toxic
pH : Flash point : wastes, indicate PPM.
7.0 176
Major and hazardous consituents. : lower : upper

Describe handling methods with codes from instructions.

Treatment codes	Storage codes	Disposal codes	Location
		7	OFF-SITE

Identify EPA ID code all transporter and TSDF operators involved in handling this waste.
ALD000622464

I certify that this information is true, accurate and complete.
SIGNATURE: (Generator or authorized representative), title and date.

[illegible] Agent 1-23-87

Below is for department use only.

Date rcvd	Complete?	Test results?	Reasonable?	Follow-up	Initials
1987	Yes No	Yes No	Yes No	Yes No	MAH

Status: Not hazardous (1); Demonstrated not hazardous (2); Small generator (3); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A).

Comments.

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name.
TENNSCO CORPORATION (PLANT 1)

: EPA ID CODE
TND 00-403-5853

2. Waste name.
WASTE PAINT

: Waste stream ID
2

3. Give years this waste has been generated.
1963

: Frequency of generation
CONTINUOUS

4. Mark all appropriate hazard criteria below.
Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f)
CODES: ~~a (1)~~ ~~#~~

: EPA waste codes.
~~D001~~ ~~F003~~
#N000

5. Physical form
LIQUID, OTHER BASED

: Percent solid
~~75.0~~ NA

: Volume to wt. (lb/gal)
11

6. Generation rates in kilograms.

Monthly maximum	Annual average	Max. amount stored	Max. days stored
2150 ~~3,900~~	18,000 ~~67,400~~	~~(7)~~ ~~9,900~~	~~(4)~~ ~~90~~

7. DOT shipping name
~~WASTE FLAMMABLE LIQUID~~

: DOT hazard class
~~FLAMMABLE LIQUID~~

: DOT ID code
~~1993~~

8. Describe generation process.
~~PAINT SLUDGE FROM WATER WASH TOUCH-UP BOOTH THIS WASTE IS ABOUT 50% DRY PAINT, SCRAP PAINT AND 50% WASTE PAINT WHICH IS COLLECTED FROM THE PAINT BOOTH WATER.~~ ( ) Please key from #17 on next pg.

*** ANNUAL REPORT SECTION *** Lines 9-11.
If the waste was shipped off-site, also submit Annual Shipping Report for Hazardous Waste Generators. If waste was handled on-site in a permitted facility, use "T", "S", or "D" codes from instructions. Otherwise, use "H" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on-site first day	Amount on-site on last day	Wst mgmt methods/ TSDF handling codes
(1)	16,300	~300 Kg	~300 Kg	D80

10. Describe the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

~~SEE NOTE (1)~~ Please key from #17 on next page

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to previous years since 1984.

~~SEE NOTE (1)~~

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT

OFFICE CORRESPONDENCE TND 00-403 5853 00835

FROM	TO	DATE
D	SWM	L&C

DATE: September 17, 1987

TO: File

FROM: Tom Yates

SUBJECT: Tennsco Corp, Dickson Co., Variance for Plant I and II

At about 9:30 a.m. on September 11, 1987 I vistied Tennsco to see their solvent recovery operation. Mr. Ed Owens was my contact. This visit was at Plant I at 402 E. Broad. Tennsco manufacturers metal shelving and other metal office furnishing. When cleaning the paint equipment used to paint these products spent solvent is generated. The solvent is recovered by on-site distillation. Mr. Owens says they recover about two gallons of solvent from a drum of waste. The reason he gave for the low amount of solvent recovered relative to the amount of waste was the type paint they use and the large amount of solids in the spent solvent. The still and its operation is consistent with the variance information. They have requested a "Special Waste" classification for the still bottoms. The distillation unit for Plant II has not yet been installed. Mr. Owens said he would let me know when the Plant II distillation unit is operating.

TY/lag L/M #8

FROM	DATE

TO

PH-0001
SR 3/77

DSWM L:C

PUBLIC NOTICE

The Commissioner of the Tennessee Department of Health and Environment is hereby giving notice of this tentative decision to grant a variance from classification as a waste, for spent flush solvent, Hazardous Waste Code D001, as generated at Tennsco Plant I, TND 004035853, 402 E. Broad in Dickson, Tennessee 37055, because this hazardous material is recycled in a manner which will not pose a significant hazard to public health or the environment. This variance will only apply to the material identified in the request and only when it is managed as described in the request.

Tennsco Corporation at their Plant I generates spent solvent in their painting process. The spent solvent is recovered on-site by a distillation process and reused as it was originally used. The on-site recovery and reuse of this hazardous waste will reduce the risk to health and environment associated with hazardous waste transportation and disposal.

The procedures for determining that certain hazardous materials that are being recycled will no longer be classified as wastes are provided in Tennessee Rule 1200-1-11-.01(4) Variance from Classification as a Waste.

Comments and/or requests for a hearing on this tentative decision will be accepted for 30 days ending at 4:30 p.m. OCT 09 1987.

Comments or requests for a hearing should be sent to: Mr. Tom Tiesler, Director, Division of Solid Waste Management, Tennessee Department of Health and Environment, Customs House, 4th Floor, 701 Broadway, Nashville, Tennessee 37219-5403; phone (615) 741-3424.

The Commissioner will issue a final decision to either grant or deny the variance after receipt of comments and after the hearing (if any).

If you wish to review the draft variance, or wish further information, please contact: Division of Solid Waste Management Field Office, Tennessee Department of Health and Environment, Customs House, Room B-01, Nashville, TN 37219-5403; phone (615) 741-0654.

TY/ah/SW-154

DSWM L&C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, TN 37243-1535

May 30, 1995

TND 00-403-5853

Tenneco Corporation (Plant 1)
Attn: Mickey Self
PO Box 606
Dickson, TN 37055

Dear Mr. Self:

This letter is to inform you that your "variance from classification as a waste" has expired for the enclosed waste stream(s). If you are still generating this waste, you will need to update the information on the attached *Hazardous Waste Stream Report* so that our database remains current. The returned form, with any revisions, will serve as your official notification to the State on that waste, and as such, will require you to report on the waste stream in your Annual Report for 1995, which you will receive in January of 1996.

If we have not received the revised waste stream(s) by June 30, 1995, you will be considered a non-notifier and an inspection will be made by our field office. This could result in a Notice of Violation being written for possible enforcement action.

If you no longer generate this waste, please complete line 8 on the *Hazardous Waste Stream Report* under the heading "date no longer generated". Be certain the date is six digits (12-31-94, 09-17-94, etc.). Sign and date the back of the form (line 16) and send the corrected copy to my attention. The waste stream will then be closed out in our database thereby requiring no more paperwork from you in subsequent years (unless you reopen the waste stream).

If you have any question, you may contact me at (615) 532-0887.

Sincerely,

Dennis Woodson

Dennis Woodson
Environmental Specialist
Waste Activity Audit

DBW

Enclosure(s)

DSWM L:C

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility: TENNSCO CORPORATION (PLANT 1)
   EPA identification code: TND 00-403-5853

2. Waste name. Use standard name from regulations whenever possible.: FLUSH SOLVENT
   Waste Stream number: 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.: 1963
   Date no longer generated. (MM/DD/YY): 6/10/92
   Frequency of generation (C): Continuous / Accidental/ One time / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g). AF
   EPA waste codes (Primary first; six maximum.): D001
   SIC code for generating process.

5. Physical form: Liq-Othr (3)
   % Solid: 10.0
   % Water: .0
   Vol. to wt. conversion (pounds/gallon): 8.000
   If used for fuel, chlorine content (PPM): 0.0
   BTU per pound: 0.0

6. Generation rates. Supply all rates in kilograms.
   Monthly maximum (kg): 2,400.0
   Annual average (kg): 20,700.0
   Maximum amount stored onsite (kg): 4,800.0
   Maximum days stored: 90

7. DOT shipping name: WASTE FLAMMABLE LIQUID
   DOT hazard class: Radioactive
   DOT ID code: 1993

8. Describe generation process.

A SOLVENT MIXTURE OF 75% TOLUENE/25% METHYL ISOBUTYL KETONE IS USED TO FLUSH AND CLEAN PAINT EQUIPMENT. ADDITIONALLY SCRAP PAINT-OFF-SPEC-IS COLLECTED WITH THE FLUSH SOLVENT. WASTE IS A MIXTURE OF FLUSH SOLVENT FROM CLEANING AND OFF-SPEC. PAINT. WASTE IS PROCESSED IN AN ON-SITE SOLVENT RECOVERY UNIT.

9. Chemical Characteristics.
   pH:
   Flash point: 17
   Reactive code:
   Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( ) (V)

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. TOLUENE	60	75
b. METHYL ISOBUTYL KETONE	20	25
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

UNDER VARIANCE WASTE IS RECYCLED IN SOLVENT RECOVERY UNIT ON-SITE.

RECEIVED JUN 6 1995 Div. of Solid & Hazardous

DSWM L:C

HAZARDOUS WASTE FACILITY INSPECTION

[illegible]

[illegible] INSPECTED

[illegible] CORP.
[illegible]
[illegible]
[illegible] and Pickett St.
[illegible], Tennessee 37055

PRIMARY CONTACT

[illegible]

INSPECTION DATE AND TIME

[illegible] 1985
[illegible] at 9:00 a.m.

INSPECTOR AND REPORTER

[illegible]
[illegible]
[illegible], Tennessee 37219-5401
[illegible]

OTHER INSPECTION PARTICIPANTS

[illegible]

PURPOSE OF INSPECTION

[illegible] full inspection was conducted to evaluate Tennessee's compliance with the [illegible] requirements of the rules governing hazardous waste management in Tennessee.

[illegible] PLANT

[illegible]

WASTES DESCRIPTION

[illegible] waste is generated at this location. [illegible] a liquid pool consisting of [illegible] water is accumulated in 55-gallon [illegible] from a high solids paint [illegible] waste is also sent to a [illegible] and found to be non-hazardous. This waste is handled at the local [illegible] for disposal only because it can be [illegible] handled at the local [illegible] waste was shipped to Chem-Fuel (TND000737510) [illegible] hazardous waste was shipped to [illegible] manifest number [illegible] generator notification for [illegible] was made on 3/27/85.

[illegible] inspection [illegible] of [illegible] plans are being made to [illegible]

INSPECTION FINDINGS

The following violations of Rule 1200-1-11-.03 were found at the time of inspection:

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program, at a minimum be designed to ensure that employees are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems including where applicable; (1) procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) key parameters for automatic waste feed cut-off systems (if any); (3) communications or alarm systems; (4) response to fires or explosions; (5) response to ground-water contamination incidents; and (6) shutdown of operations. (0107)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator assures that the personnel training program be reviewed annually by all employees who handle or manage hazardous waste. (0125)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing the job title for each position related to hazardous waste management and the name of the employee filling each job. (0126)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written job description for each position related to hazardous waste management.

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records and documents containing a written description of the type and amount of both introductory and continuing training that will be given to each employee who handles or manages hazardous waste. (0128)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains records that document that all the required personnel training or job experience has been given to and completed by the employees who handle or manage hazardous waste. (0135)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator retains training records on current employees who handle or manage hazardous waste while hazardous waste is being accumulated. Training records of former employees must be kept for at least three years from the date the employee last worked in the position which handles or manages hazardous waste. Personnel training records may accompany an employee transferred within the same company. (0143)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator designs his contingency plan to minimize hazards to public health or the environment from fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. (0157)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the actions employees must take to immediately respond to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the accumulation area(s). (0165)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordiantor is on call) will immediately: activate internal alarms or communication systems, where applicable, to notify all other affected employees; and notify appropriate State of local agencies with designated response roles if their help is needed. (0166)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, whenever there is a release, fire, or explosion the emergency coordinator will immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records and if necessary, by chemical analysis. (0167)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will concurrently assess possible hazards to public health or the environment that may result from a release, fire, or explosion. This assessment must consider both direct and indirect effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions. (0168)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will immediately notify appropriate local authorities and the Tennessee Emergency Management Agency, if he determines that the facility has had a release, fire, or explosion which could threaten public health or the environment outside the facility, and then be available to help the appropriate officials decide whether local areas should be evacuated. (0169)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, during an emergency, the emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, collecting and containing released waste, and removing or isolating containers. (0171)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how, immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. (0173)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the emergency coordinator will ensure that, in the affected accumulation area(s): no waste that may be incompatible with the released material is stored in the accumulation area until clean-up procedures are completed; and all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before hazardous wastes are stored in the affected accumulation area(s). (0174)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator will notify the Commissioner, and appropriate local authorities, that the cleanup procedures have been completed and all emergency equipment has been cleaned and fit for its intended use before hazardous waste are stored in the affected accumulation area(s). (0175)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes how the generator's will note in his files the time, date, and details of any incident that requires implementing the contingency plan and how, wihtin 15 days after the incident, he will submit a written report on the incident to Commissioner. (0176)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan describes the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, as appropriate for the type of waste handled at the accumulation area and the potential need for the services of these organizations. (0177)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan lists the names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator and keep this list up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. (0185)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes the location, a physical description and a brief outline of the capabilities of each item on the list of emergency equipment at the accumulation area (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where thisequipment is required. (0197)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator's contingency plan includes an evacuation plan for employees 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, (in cases where the primary routes could be blocked by releases of hazardous waste or fire). (0205)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator maintains a copy of the contingency plan and all revisions to the plan and submits them to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. (0207)

Rule 1200-1-11-.03(4)(b)1(i) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator, if the waste is stored in containers, ensures that containers holding hazardous waste are always kept closed during storage, except when it is necessary to add or remove waste. (0447)

Rule 1200-1-11-.03(4)(b)1(ii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. (0515)

Rule 1200-1-11-.03(4)(b)1(iii) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that while hazardous waste is being accumulated on-site each container and tank is labeled or marked clearly with the words "HAZARDOUS WASTE". (0525)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator accumulates the hazardous waste in a manner which will minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten public health or the environment. (0535)

Rule 1200-1-11-.03(4)(b)1(iv) allows a generator to accumulate hazardous waste on-site for 90 days or less without a permit or without interim status under Rule 1200-1-11-.07 provided that the generator ensures that the accumulation area(s) is equipped with a devise, such as a telephone (immediately available at the scene of accumulation) or a hand-held two way radio, capable of summoning emergency assistance from local police departments, fire departments, or State and local emergency response teams, unless none of the hazards posed by the waste accumulated warrent this kind of equipment. (0555)

Rule 1200-1-11-.07(1)(b)1(i) prohibits a new hazardous waste management facility, in Tennessee, from treating, storing or disposing of hazardous waste unless the owner or operator has a permit under the Tennessee Hazardous Waste Management Act. (3500)
Waste on hand had been stored more than 90 days.

SIGNED: Bob Barton DATE: 4-12-85

DSWM L&C

PUBLIC NOTICE

The Commissioner of the Tennessee Department of Health and Environment is hereby giving notice of this tentative decision to grant a variance from classification as a waste, for spent flush solvent, Hazardous Waste Code D001, as generated at Tennsco, Plant 2, TND 980845390, corner of 1st Street and Pickett in Dickson, Tennessee 37055, because this hazardous material is recycled in a manner which will not pose a significant hazard to public health or the environment. This variance will only apply to the material identified in the request and only when it is managed as described in the request.

Tennsco Corporation at their Plant 2 generates spent solvent in their painting process. The spent solvent is recovered on-site by a distillation process and reused as it was originally used. The on-site recovery and reuse of this hazardous waste will reduce the risk to health and environment associated with hazardous waste transportation and disposal.

The procedures for determining that certain hazardous materials that are being recycled will no longer be classified as wastes are provided in Tennessee Rule 1200-1-11-.01(4) Variance from Classification as a Waste.

Comments and/or requests for a hearing on this tentative decision will be accepted for 30 days ending at 4:30 p.m. OCT 12 1987.

Comments or requests for a hearing should be sent to: Mr. Tom Tiesler, Director, Division of Solid Waste Management, Tennessee Department of Health and Environment, Customs House, 4th Floor, 701 Broadway, Nashville, Tennessee 37219-5403; phone (615) 741-3424.

The Commissioner will issue a final decision to either grant or deny the variance after receipt of comments and after the hearing (if any).

If you wish to review the draft variance, or wish further information, please contact: Division of Solid Waste Management Field Office, Tennessee Department of Health and Environment, Customs House, Room B-01, Nashville, TN 37219-5403; phone (615) 741-0654.

TY/ah/SW-154

DSWM L&C

INSPECTION REPORT

SITE/OPERATION INSPECTED:

Tennsco Corporation - Plant II & III
TND 98 084 9330
P.O. Box 805
Dickson, TN 37055

OWNER/OPERATOR/PRIMARY CONTACT:

Nick Self
445-8035

DATE AND TIME OF INSPECTION:

November 24, 1987
9:00 a.m.

REPORT PREPARED BY:

Tom Golden
701 Broadway, R.O.
Nashville, TN 37243-0503
(615) 741-3551

NAMES AND AFFILIATIONS OF OTHER INSPECTION PARTICIPANTS:

None

PURPOSE OF INSPECTION:

This unannounced unscheduled inspection was conducted to evaluate Tennsco's compliance with the applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

FACILITY DESCRIPTION:

Tennsco Plant II and III manufactures office cabinets. The hazardous waste generated at these plant is a D001 waste solvent. Tennsco has a variance for the recovery of the solvent of this waste.

INSPECTION FINDINGS:

No violations were apparent during the inspection. All the conditions of the variance were met at the time of the inspection.

Tom Golden
Tom Golden

December 8, 1987

See full instructions for form PH-2022 for additional information

Disturbed

1. Organization's name.
TENNSCO CORPORATION (PLANT 1)

VARIANCE GRANTED DURING 1987

(1989)

| EPA ID CODE
IND 00-403-5853

2. Waste name.
FLUSH SOLVENT

| Waste stream ID
1

3. Give years waste generated | Date stopped | Frequency of generation
1963 / / CONTINUOUS

4. Mark all appropriate hazard criteria below. |EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| AF |~~F003~~ D001 |

5. Physical form |% Solid|% Water|lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 010.0| |0008.000 | |

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
2,400 20,700 4,600 5 ~~30~~

7. DOT shipping name | DOT hazard class | DOT ID code
WASTE FLAMMABLE LIQUID FLAMMABLE LIQUID 1993

8. Describe generation process. WASTE IS A MIXTURE OF FLUSH SOLVENT FROM CLEANING AND OFF-SPEC. PAINTS. ~~FROM AND CLEAN FROM SOLVENTS. [illegible] OFF SPEC IS CORRECTED WITH THE FLUSH SOLVENT.~~ WASTE IS PROCESSED IN AN ON-SITE SOLVENT RECOVERY UNIT.

** ANNUAL REPORT SECTION ** LINES 9-11

9.

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1987	29,500	~200	~200

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	25 319	(Y) N	H09
B	4181	Y (N)	T54
C	BALANCE MANAGED	Y N	
D	UNDER VARIANCE	Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . b( ) e. Improved operations. . . . e(
c. Equipment/technology modification c( ) f. No effort. . . . . f(

g. Other - explain below: . . . . . g( )
N/A - VARIANCE GRANTED

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt of Reduction (kg)
N/A - VARIANCE GRANTED. 0

Hazardous Waste Stream Report - Front DEC 31, 198

See full instructions for form PR-2022 for additional information and codes.

1. Organization's name. | EPA ID CODE
TENNECO CORPORATION (PLANT 1) TXD 00-403-5853

2. Waste name. NON HAZARDOUS WASTE DROP FROM LISTING. | Waste stream ID
WASTE PAINT (1) 2

3. Give years waste generated | Date stopped | Frequency of generation
1963 / / CONTINUOUS

4. Mark all appropriate hazard criteria below. |EPA waste codes | SIC
Ignitible (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| A |N000 |

5. Physical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 075.0| |0311.000 | |

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
2,150 18,000 1 1

7. DOT shipping name | DOT hazard class | DOT ID code
WASTE FLAMMABLE LIQUID FLAMMABLE LIQUID 1993

8. Describe generation process.
THIS MATERIAL ORIGINATED FROM THE WALLS OF THE PAINT BOOTHS AND RESULTS FROM HIGH SOLIDS PAINTS BEING SPRAYED. PREVIOUSLY THIS MATERIAL WAS MANAGED AS A HAZARDOUS WASTE BECAUSE OFF-GRADE PAINT WAS MIXED WITH THIS WASTE. THE ATTACHED LAB ANALYSES VERIFY MATERIAL TO BE NON-HAZARDOUS.

** ANNUAL REPORT SECTION ** LINES 9-11 ---------- ----------

9. Report Year 1987 | Amount generated during year (kg) | Amount on site on first day (kg) | Amount on site on last day (kg)

	Amount Handled	Handled On site?	TSDF handling/waste management methods
A		Y N	
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( ) d. Substituting raw materials d(
b. In process recycling. . . . . b( ) e. Improved operations. . . . e(
c. Equipment/technology modification c( ) f. No effort. . . . . f(

g. Other - explain below: . . . . . g( )

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11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt of Reduction (kg)

1987 Annual Shipping Report for Hazardous Waste Generators

(For wastes shipped off-site only.)

Page 1 of 1

EPA ID CODE TND 98-088-5392
TENNSCO CORPORATION (PLANT 283)
MICKEY SELF
PO BOX 6 6
DICKSON TN 37 55

Please complete and return this form to following address:

Tennessee Department of Health and Environment
Division of Solid Waste Management
Customs House, Fourth Floor
701 Broadway
Nashville, Tennessee 37219-5403

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

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2. Waste stream numbers.	Dot Shipping Name / Waste name	EPA Waste codes	Amount shipped in Kilograms	Number of shipments	TSDF EPA ID number	Transporter EPA ID number	TSDF Handling codes
a. 1	WASTE FLAMMABLE LIQ. FLMSA SOLVENT	D001	7131	1	ALD 094476793	ALD 094476793	T50
b.							
c.							
d.							
e.							
f.							
g.							
h.							
i.							

3. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

X Mickey D Self Purchasing Agent 2-18-88

DSWM 2.2

DSWM L.C

Hazardous Waste Notification Summary JAN 06, 1989

See full instructions for Form PH-2019A for additional information and codes.

1. Organization's name
TENNSCO CORPORATION (PLANT 2&3)
| EPA ID CODE
TND 98-084-5390

2. Mailing address
PO BOX 606
| City
DICKSON JAN 27 1989
| State|Zip
TN 37055

3. Physical location or address
1ST & PICKETT ST
| County name
DICKSON

Latitude | Longitude
.0000 .0000

4. Owner name
LESTER D SPEYER
| Phone
(615) 446-8000

5. MANAGER OR operator name
ROY STINSON
| Phone
(615) 446-8000

6. Principal technical contact
MICKEY SELF
| Phone
(615) 446-8000

7. Number of employees | Year began |SIC codes | Job shop
187 1980 2542, , , NO

8. Emergency contacts

Name	Time period covered	Phone
A ROY STINSON	HOME	(615)446-3471
B JENELL LOGGINS	HOME	(615)446-4564
C LARRY DUNN	HOME	(615)446-9432
D MICKEY SELF	HOME	(615)789-5618

9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.
994299P, 994300P, 994302P, AND 994303P

10. I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date
Mickey B. Self ENGINEERING ASST. 2-22-89

Below is for Department use only.

11. Date rcvd | County | Priority | Generator | Small Gen. | Special status
2-23-89 | 22 | | Yes (No) | Yes (No) |

12. Date closed | Date regulated | Date deregulated |Insp. Freq.
/00/00 /00/00 /00/00 2

13. Comments

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DIV. OF SWM

Hazardous Waste Stream Report - Front JAN 06, 1989

See full instructions for form PH-2022 for additional information and codes.

1. Organization's name. | EPA ID CODE
TEMMSCO CORPORATION (PLANT 2E3) TMD 98-084-5390

2. Waste name. | Waste stream ID
FLAMMABLE LIQUID (1)

3. Give years waste generated | Date stopped | Frequency of generation
(SINCE 1980) 4 YEARS /00/00 CONTINUOUS

4. Mark all appropriate hazard criteria below. |EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES| A |D001 | 2542

5. Physical form |% Solid|% Water|Lb./gal. | Chlorine PPM | BTU/lb.
LIQUID, OTHER BASED | 75.0| | .000 | .0 | .0

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
728 4,368 2,184 90

7. DOT shipping name | DOT hazard class | DOT ID code
FLAMMABLE LIQUID FLAMMABLE LIQUID 1993

8. Describe generation process.
BAD PAINT AND PAINT THINNER MIXED FOR PAINT EQUIPMENT CLEAN-UP.

** ANNUAL REPORT SECTION ** LINES 9-11

9. Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1988	0	0	0

	Amount Handled	Handled On site?	TSDF handling/Waste management methods
A	0	Y N	
B		Y N	
C		Y N	
D		Y N	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( ) d. Substituting raw materials d( )
b. In process recycling. . . . . b( ) e. Improved operations. . . . e( )
c. Equipment/technology modification c( ) f. No effort. . . . . f( )

g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c( ). | Amt. of Reduction (kg)

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Hazardous Waste Stream Report - Back JAN 06, 1989

See full instructions for form PH-2022 for additional information and codes.

Organization's name.
TENNSCO CORPORATION (PLANT 2E3)

| EPA ID CODE
TND 98-084-5390

Waste name.
FLAMMABLE LIQUID

| Waste stream ID
(1)

12. Chemical Characteristics. | Concentration units. For EP toxic
pH | Flash point | Reactive code | wastes, indicate PPM.

Major and hazardous consituents. | lower | upper

13. If this waste is recovered, reclaimed, recycled, or reused, describe how.

THIS WASTE IS NO LONGER GENERATED. MATERIALS ARE HANDLED IN AN ON SITE SOLVENT RECOVERY UNIT COVERED BY A VARIANCE.

15. I certify that this information is true, accurate and complete.
SIGNATURE| (Generator or authorized representative), title and date.

Michael Self EXECTIVE ASST. 2-22-89

Below is for department use only.

17. Date rcvd Complete? Test results? Reasonable? Follow-up Initials

2-23-89 | Yes No | Yes No | Yes No | Yes No Zee

Status| Not hazardous (1); Demonstrated not hazardous (2); Status Report
Small generator (3); Resource recovery (4); 9 N
Partial exemption (5); Hazardous (6);
Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastse (R).

18. Comments.

Variance granted Oct. 1987
Still Bottoms given Special Waste approval by Nashville Field Office March 1987

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FEB 23 1989
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Data File

1988 Annual Shipping Report for Hazardous Waste Generators

(For wastes shipped off-site only.)

Page 1 of 1

EPA ID CODE TND 98-084-5390 Y- -h
TENNSCO CORPORATION (PLANT 263)
MICKEY SELF
PO BOX 606
DICKSON TN 37055

Please complete and return this form to following address:

Tennessee Department of Health and Environment
Division of Solid Waste Management
Customs House, Fourth Floor
701 Broadway
Nashville, Tennessee 37219-5403

Also, complete this form when terminating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2. Waste stream numbers.	Dot Shipping Name / Waste name	EPA Waste codes	Amount shipped in kilograms	Number of shipments	TSDF EPA ID number	Transporter EPA ID number	TSDF Handling codes
a.							
NO	HAZ WASTE	SHIPMENTS	MADE IN	1988			
b.							
c.							
d.							
e.							
f.							
g.							
h.							
i.							

3. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Mickey Self EXECTIVE ASST 2-22-89

[illegible] (Rev. [illegible])

DSWM L&C

Hazardous Waste Notification

Tennessee Department of Health and Environment, Division of Solid Waste Management, Customer Service - Fourth Floor, 701 Broadway, Nashville, Tennessee 37243-0463

1. Organization's full, legal name: TENNECO CORPORATION, PLANT 2/3		EPA identification code: TND 980846390	
2. Mailing address: P.O. BOX 606	City: DICKSON	State abbrev.: TN	ZIP code: 37055
3. a. Physical location or address: FIRST & PICKETT STS.		County name: DICKSON	
b. Latitude (degrees, minutes & seconds): 36.0500	Longitude (degrees, minutes & seconds): 87.240		
4. Owner name: LESTER SPEYER		Phone with area code: (615) 446-8000	
5. Manager or operator name: MICKEY SELF		Phone with area code: (615) 446-8000	
6. Principal technical contact: MICKEY SELF		Phone with area code: (615) 446-8000	
7. Number of employees: 300+	Year operation began: ~1958	SIC codes (Primary SIC first, etc.): 2542	Job shop: Yes (No)

8. Emergency contacts for 24 hours per day and 7 days per week

Name	Time period covered	Phone with area code
a. MICKEY SELF	ALL TIMES	446-8000
b.		
c.		
d.		

9. Current environmental permits for air, water, and radiological permits. Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.

AIR PERMITS FOR COATING APPLICATION & CITY WASTE WATER DISCHARGE.

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Mickey Self	Purchasing Agent	12-17-90

11. Below is for department use only

Date received	County code	Priority	Generator	Small generator	Special status
122090	22		Yes (No)	Yes (No)	

Date closed	Date registered	Date deregistered	Inspection frequency: annual (4), FY89-90 (1), FY89-90 (2).		

12. Comments

Hazardous Waste Stream Report

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility: TENNSCO CORPORATION

EPA identification code: TND 980845390

2. Waste name. Use standard name from regulations whenever possible: WASTE/SCRAP PAINT-LIQUID

Waste Stream number: 1

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1990 - 0

Date no longer generated. (MM/DD/YY)

Frequency of generation: Continuous / Accidental/ (One time) / Various

4. Circle all appropriate hazard criteria below. Ignitable (d), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f).

EPA waste codes. (Primary first): D001/F003/F005

SIC code for generating process: 2542

5. Physical form: ② LIQUID 3

Percent solid	Percent water	Vol. to wt. conversion (pounds per gallon)	If used for fuel, chlorine content	If used for fuel, BTU per pound
50 %	0 %	10	N/A PPM	N/A /lb.

6. Generation rates. Supply all rates in kilograms.

Monthly maximum	Annual average	Maximum amount stored on site	Maximum days stored
① 12,750. (kg)	— (kg)	(kg)	N/A

7. DOT shipping name: WASTE FLAMMABLE LIQUID

DOT hazard class: FLAMMABLE LIQ 07

DOT ID code: UN 1993

8. Describe generation process.

① THIS ONE TIME GENERATION IS TO DISPOSE OF PAINT RAW MATERIALS DUE TO A PROCESS SHUTDOWN USING THIS PAINT.

*** ANNUAL REPORT SECTION *** Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off site, also submit Annual Shipping Report for hazardous waste generators. For handling in a permitted facility, use "T", "S", or "D" codes from instructions. For other handling, use "A" codes from instructions.

Report Year	Amount generated during year (kg)	Amount on site on first day of year (kg)	Amount on site on last day of year (kg)

	Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods		Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods
a				b			
c				d			

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.

a. Reformulation/redesign of product . a( )
b. In process recycling. . . . . b( )
c. Equipment/technology modification . c( )
d. Substituting raw materials . . . . d( )
e. Improved operations. . . . . e( )
f. No effort. . . . . f( )
g. Other - explain below . . . . . g( )

11. Describe changes in volume and toxicity that these reduction efforts described in line 10 produced last year compared to the previous year.

Amount of Reduction (kg)

a. Increased toxicity-a( ), b. decreased toxicity-b( ), c. No change-c( ).

PH-2022(SWM 11/87 Rev.)

Hazardous Waste Stream Report

Tennessee Department of Health and Environment, Division of Solid Waste Management.
Customs House - Fourth Floor, 701 Broadway, Nashville, TN 37219-5403

1. Organization's full name at facility: TENNSCO CORPORATION
EPA identification code: TND 980845390

2. Waste name. Use standard name from regulations whenever possible.: WASTE PAINT - SOLID
Waste Stream number: 2

3. Give the years that this waste has been generated, e.g. 1975, 1982-. 1990
Date no longer generated. (MM/DD/YY):
Frequency of generation: Continuous / Accidental/ (One time) / Various

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f).
EPA waste codes. (Primary first): D001 / F003 / F005
SIC code for generating process: 2542

5. Physical form: SOLID
Percent solid: ~100 %; water: - %
Vol. to wt. conversion (pounds per gallon): 10
If used for fuel, chlorine content: N/A ppm; BTU per pound: N/A /lb.

6. Generation rates. Supply all rates in kilograms.
Monthly maximum: 8273. (kg)
Annual average: — (kg)
Maximum amount stored on site: — (kg)
Maximum days stored: N/A

7. DOT shipping name: SOLID HAZ WASTE N.O.S.
DOT hazard class:
DOT ID code: UN 1993

8. Describe generation process.
(1) THIS ONE TIME GENERATION IS TO DISPOSE OF PAINT RELATED RAW MATERIALS DUE TO A PROCESS SHUTDOWN USING THESE MATERIALS.

*** ANNUAL REPORT SECTION *** Complete at end of each year and when terminating business for a waste which requires notification. Continue with line 12.

9. Annual generation and handling data. If waste was shipped off site, also submit Annual Shipping Report for hazardous waste generators. For handling in a permitted facility, use 'T', 'S', or 'D' codes from instructions. For other handling, use 'M' codes from instructions.

Report Year	Amount generated during year (kg)	Amount on site on first day of year (kg)	Amount on site on last day of year (kg)

	Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods		Amount Handled	Handled On site? Y/N	TSDF handling/Waste management methods
a				b			
c				d			

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year. This reduction refers to generation processes and not treatment methods.
a. Reformulation/redesign of product . a( )
b. In process recycling. . . . . b( )
c. Equipment/technology modification . c( )
d. Substituting raw materials . . . . d( )
e. Improved operations. . . . . e( )
f. No effort. . . . . f( )
g. Other - explain below. . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts described in line 10 produced last year compared to the previous year.
Amount of Reduction (kg)
a. Increased toxicity-a( ), b. decreased toxicity-b( ), c. No change-c( ).

PH-2022(SHW 11/87 Rev.)

FWD 98-284-5390 22 40

T 6-12 Nco

SNS 1248

DEC 07 1992

DSWM
L&C

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
537 BRICK CHURCH PARK DRIVE
NASHVILLE, TENNESSEE 37243-1505

December 2, 1992

Mr. Mickey Self
[redacted]
201 Tennsco Drive
P. O. Box 506
Dickson, Tennessee 37055-0506

Re: Drum dump site on Tennsco Property (behind former Winner Boat Plant)

Dear Mr. Self:

On December 1, 1992 Jim Cornwell and I met with you and Tennsco staff where we inspected the drum dump site on Tennsco property behind the former Winner Boat Plant. We observed discolored soil and deteriorated barrels, many of which contained a hardened resin, in two (2) cells which are located some 300' behind the building. One cell had been partially disturbed, but you informed me that no waste had been removed.

The Division of Solid Waste Management requires that certain precautions be taken during the remediation process. As waste is removed from the cells, and different waste types are encountered, separate staging or holding areas are required prior to running analysis. If indeed, there is more than one (1) waste type, then representative sampling and assay be performed on each waste type to determine if it is hazardous. Also, after the waste is totally removed from the cells, soil samples must be taken on the bottom of the cells to assure that a proper closure has been achieved. If soil discoloration is visible in certain areas after removal of the waste, sampling as well as a total analysis would be in order.

After this is done, please contact me for a follow up inspection of the site. Also, after re-inspecting the site and reviewing all analytical data, the Division will consider your request for a special waste permit.

If there are any questions please contact me at (615) 741-0836.

Sincerely,

Wayne Harbin

Wayne Harbin
Division of Solid Waste Management

WH/fg

DSWM L&C

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name at facility. TENNECO CORPORATION PLANT 2/3	EPA identification code TND 98-084-5190
2. Waste name. Use standard name from regulations whenever possible. FLAMMABLE LIQUID	Waste Stream number 503
3. Give the years that this waste has been generated, e.g. 1975, 1982-. (SINCE 1988) 4 YEARS	Date no longer generated. (MM/DD/YYYY) 01-04-93
	Frequency of generation (C) Continuous ___ Accidental/ One time ___ Various
4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g).	EPA waste codes. (Primary first; six maximum.) D001
	SIC code for generating process.

5. Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	If used for fuel, BTU per pound
LIQUID	75.0	0	8.000	0.0	0.0

6. Generation rates. Supply all rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum amount stored on-site (kg)	Maximum days stored
728.0	4,368.0	2,184.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
FLAMMABLE LIQUID	Flam. liquid	07	1993

8. Describe generation process.

BHO PAINT AND PAINT THINNER MIXED FOR PAINT EQUIPMENT CLEAN-UP.

DELETE THIS STREAM

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM( )

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a.		
b.		
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

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IND 98-017-519

LIQUID WASTE PAINT STREAM #4 DSWM

L&C

11. Amount Generation and Handling Data: If the waste was shipped offsite, summarize in block (a) and submit an Offsite Shipping Report. Report onsite handling in blocks (b) - (d). For offsite or onsite handling that requires interim status or a permit, use "T", "S", or "D" codes from the instructions. For other handling, use "M" codes.

Report Year 1994	Amount generated during year (kg)	Amount onsite in temporary storage on the first day of year (kg)	Amount onsite in temporary storage on the last day of year (kg)
	~~60,909~~ 103,636.	0	0

	Items handled Offsite	TSDR handling/waste management methods		Amount handled Onsite	TSDR handling/waste management methods
a	~~60,909~~ 103,636.	S01/T50	b	—	—
c	—	—	d	—	—

Hazardous Waste Reduction Data: See the instructions for detail information required for completing lines 12-15 below.

12. Specify your actual hazardous waste generation and final reduction goal as ratios of hazardous waste generated to the item, service or intermediary produced in its standard production units.

This year's actual ratio	Goal year's ratio	Goal Year	If no numeric goal has been set, describe your efforts to set one in line 15 below.
0)	0	0	0

13. Check the efforts undertaken to reduce the volume and/or toxicity in the generation of this waste during the reported year. This includes the efforts undertaken in previous years that affected the reported year. The reduction effort relates to generation processes and not treatment methods.

a. Reformulation/redesign of product . (a)
b. In process recycling. . . . . (b)
c. Equipment/technology modification . (c)
d. Substituting raw materials . . . . (d)
e. Improved operations . . . . . (e)
f. Reduction research/planning . . . . . (r)
g. No effort . . . . . (f)
h. Other - briefly explain here. . . . . (g)

14. Rate the helpfulness of the items below that affected your hazardous waste reduction plan and its results. To the right of each item, circle one code: YES, this item helped reduction; NO, it hurt reduction; or NA, it was not necessary or did not affect reduction. See the instructions for further explanation.

a. Training or technical assistance.....a(No NA Yes)
b. Technical feasibility.....b(No NA Yes)
c. Economic practicality.....c(No NA Yes)
d. Measurement/accounting methods.....d(No NA Yes)
e. TN hazardous waste regulations.....e(No NA Yes)
f. Implementation experience.....f(No NA Yes)
g. High costs of haz. waste mgt.....g(No NA Yes)
h. Accidental generation.....h(No NA Yes)
i. Other - describe here:.....i(No NA Yes)

15. Narrative: provide additional explanation of any of the above data that will show your efforts to reduce the generation of this hazardous waste or describe impediments to its reduction.

COMPANY IS MOVING FROM HIGH SOLIDS PAINT TO POWDER COATING AT THIS FACILITY. PLANS ARE TO HAVE POWDER IN OPERATION BY FALL, 1995. THIS WILL NATURALLY ELIMINATE H.W. GENERATION.

(1) DURING 1994 A SPECIAL EFFORT WAS MADE TO PUSH MORE WASTE PAINT INTO THE RECYCLABLE MATERIAL STREAM. PRODUCTION WAS UP ABOUT 10% OVER 1993 WHILE WASTE GENERATION WAS DOWN ~~ABOUT 15% OR A NET REDUCTION OF 25% IN WASTE GENERATION~~

16. Certification: I certify that the information given on this form is true, accurate and complete.

SIGNATURE: (Generator or authorized representative) | TITLE: | DATE:
Michael A. Kelly MRR Exec Asst | 2-2-95

For State or Department use only.

17. Date received (MM/DD/YY): 02-07-1995 | Complete? Yes No | Test results? Yes No | Reasonable? Yes No | Follow up Yes No | Initials DBW

Status: Not Hazardous (1); Demonstrated not Hazardous (2); Resource recovery (4); Partial exemption (5); Hazardous (6); Accidental (7); No longer generated (8); Variance granted (9); Conditionally exempt (A); Mixed radiological wastes (R); Corrective Action (C); Waste water Rx (W).

Status | Further Reporting Y N

18. Comments.

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FEB 14 1995
SOLID & HAZ. WASTE DIV.

1994 Offsite Shippi Report

For wastes shipped offsite only.

Page 1 of 1

D 98-084-5390 YN - Nashville

NISCO CORPORATION PLANT 2/3
Attn: RICKEY SELF
BOX 606
CKSON, TN 37055

Please complete and return this form to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also complete this form when generating business.
For technical assistance, call 1 (800) 237-7018 in Tennessee only.

2. Waste Stream or "RS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDF/Destination Facility EPA ID Number	Transporter EPA ID Number	TSDR Handling Codes
4	LIQUID WASTE PAINT	D001, F003, F005	21,591 ~~18,182~~	~~2~~ 3	TND 98-192-0119	TND 98-192-0119	S01, ~~T50~~
4	LIQUID WASTE PAINT	D001 F003 F005	63,863 ~~42,727~~	~~5~~ 7	TND 98-192-0119	ALD 09-447-6793	S01, ~~T50~~
5	SOLID PAINT WASTE	D001 F003 F005	9545	2	TND 98-192-0119	TND 98-192-0119	S01, ~~T50~~
5	" " "	" " "	60,000	5	TND 98-192-0119	ALD 09-447-6793	S01, ~~T50~~
4	LIQUID WASTE PAINT	D001 F003 F005	18,182	1	ALD070513767	ALD070513767	S01, T50
5	SOLID PAINT WASTE	D001 F003 F005	26,136.	3	ALD094476793	TND981920119	S01, T50
5	SOLID PAINT WASTE	" "	7955	1	TND981920119	TND981920119	S01, ~~T50~~

3. Total: Sum the two columns to the right.
Page totals: sum the following two columns
Final totals: sum all page totals on last page of report

4. Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Walker B. Self Exec. Assistance 2-2-95
RMBL REVISED 2-8-95

GB-0779 RDA 2203

FEB 1 1995

DSWM
L&C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation; Division of Solid Waste Management
Fifth Floor, L & C Tower; 401 Church Street; Nashville, TN 37243-1538

If data is incorrect, please change, certify and return. Retain a copy of any changes.

Name of business (full legal name): [illegible] CORPORATION PLANT 2/3			EPA identification code: TNR 98-084-5390
Mailing address: PO BOX 806	City: DICKSON	State: TN	Zip code: 37055
Site address: FIRST & PICKETT STS	City:	State:	Zip code:	County name: Dickson
Latitude (degrees, minutes & seconds): 36.0500	Longitude (degrees, minutes & seconds): 87.2409		
Owner name (may be corporation or company name): LESTER SPEYER		Type:	Phone with area code: (615) 446-8000
Manager or operator name: MICKEY SELF		Type:	Phone with area code: (615) 446-8000
Primary or technical contact: MICKEY SELF	FAX number with area code:		Phone with area code: (615) 446-8000
Number of employees: 300	Year operation began: 1958	SIC codes (Primary SIC first, etc.): 2542, , ,	Job shop: (N) Yes No

Emergency contacts for 24 hours per day and 7 days per week:

Name	Time period covered	Phone with area code
MICKEY SELF	ALL TIMES	(615) 446-8000
[illegible]	ALL TIMES	(615) 446-4564
	HOME	(615) 446-9432
	HOME	(615) 789-5618

Do you recycle, RCRA hazardous waste from offsite and recycle it? Yes ( ) No ( )

I certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Mickey B. Self	EXEC. ASST	1-31-96

For TDEC Solid Waste, Hazardous, use only

Date received: 02-06-1996	County code: 22	Priority:	Generator: Yes No	Small Generator: Yes No	Special status:
Date of mail:	TSDR status:	Transporter status:			

Remarks:

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FEB 06 1996

RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name of facility TENNECO CORPORATION PLANT 2/3	EPA identification code TND 98-084-5390
2. Waste name. Use standard name from regulations whenever possible. LEADED WASTE PAINT	WASTE STREAM NUMBER 4
3. Give the years that this waste has been generated, e.g. 1975, 1982. 1987	Date no longer generated. (MM/DD/YY) Annual Frequency of generation Continuous Accidental/ Variously/ One time
4. Check all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g). as	EPA waste codes. (Primary first; six maximum.) D001,F003,F005
	SIC code for generating process. 2542.

5. Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	% used for fuel, chlorine content(PPM)	BTU per pound
Liq-Oily (3)	50		16.000	0.0	~~0~~ 11,500

6. Generation rates in kilograms. Identify maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
50,000.0	10,000.0	50,000.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
FLAMMABLE LIQUID	ORM-D	10	UN1993

8. Describe the generation process.

COLLECTED AND TEMPORARILY STORED IN 55 GALLON DRUMS. (1) VARIES TO NO GENERATION

9. Chemical Characteristics	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
pH	140F		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a.		
b.		
c.		
d.		
e.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

T50

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CS-0772 (Rev. 11/89) Both Contacts on the Back RDA 2203

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. Organization's full name or facility TENNESSEE CORPORATION PLANT 2/3	EPA identification code TND 98-084-5390
2. Waste name. Use standard name from regulations whenever possible. WASTE PAINT SOLID	WASTE STREAM NUMBER 5

3. Give the years that this waste has been generated, e.g. 1979, 1982. 1992	Date no longer generated. (MM/DD/YY)	Annual Frequency of generation Continuous Accidental/ Variously (Y) One time
4. Check all appropriate hazard criteria below. Ignitable (Ig), EP toxic (b), Corrosive (c), Reactive (d), Other toxic (f), TCLP (g). ef	EPA waste codes. (Primary first; six maximum.) D001, F003, F005	SIC code for generating process. 2542.

Physical form code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liquid (9)	1 + 1		10.000	0.0	~~0.0~~ 12,500.

6. Generation rates in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
20,000.0	65,000.0	50,000.0	90

7. DOT shipping name	DOT hazard class		DOT ID code
WASTE FLAMMABLE SOLID	Explosives	01	

8. Describe the generation process.

9. Chemical Characteristics. pH	Flash point	Reactive code	Concentration units. Use PPM for TCLP and EP Toxic wastes (% volume( ), % weight( ), PPM(β))
	145F		

Major and hazardous constituents. Give range of values at right.	lower value	upper value
A.		
B.		
C.		
D.		
E.		

10. Describe how you have managed or intend to manage this waste *through final disposition*.
Use the Waste Management Method Codes on page 6 of the instructions.

T50

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FEB 06 1995

1995 Offsite Shipment Log

Hazardous waste only

Page 1 of 1

TND 05-084-5590 IN NASHVILLE

TRUNKO CORPORATION PLANT 223
REED MILLER RD
PO BOX 404
DICKSON TN 37055

Please complete and return pink copy to following address:

Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243-1535

Also complete this form when transporting business.
For technical assistance, call 1 (800) 237-7019 in Tennessee only.

Waste Stream "TS"	DOT Shipping Name or Waste Name	EPA Waste Codes	Amount shipped in kilograms	Number of shipments	TSDF Destination Facility EPA ID Number	Transporter EPA ID Number	TSDR Handling Codes
4	LIQUID WASTE PAINT	D001 F003 F005	129,500.	7	ALD 07-051-3767	ALD 07-051-3767	S01, T50
4	LIQUID WASTE PAINT	D001 F003 F005	3,000.	1	ALD 98-102-0894	ALD 98-102-0894	S01, T50
5	SOLID WASTE PAINT	D001 F003 F005	6000	1	ALD 98-102-0894	ALD 98-102-0894	S01, T50

FEB 06

Note: Sum the two columns to the right.

Page totals: sum the following two columns 137,500 9

Final totals: sum all page totals on last page of report

Certification: I certify that the above information is true, accurate and complete. (Sign by generator and give title and date.)

Mickey B Sell EXEC. ASST 1-31-96

RDA 2703

DSWM
L&C

RCRA Inspection Report

Inspector and Author of Report

Tom Yates, Environmental Specialist

Facility Information

Tennsco Plant 2/3
PO Box 606
First & Pickert Street
Dickson Tennessee 37056
TND 98-004-5390
(615) 446-8000

Responsible Official

Mickey B. Self

Inspection Participants

Ed Owens, Tennsco
Woody Adams, Tennsco

Date and Time of Inspection

February 7, 1996
Approximately 8:30 a.m.

Applicable Regulations

Tennessee's Hazardous Waste Management Regulations (Tennessee Rule Chapter 1200-1-11)

Purpose of Inspection

To conduct an unannounced hazardous waste generator compliance evaluation inspection to determine Tennsco's compliance status with Tennessee's Hazardous Waste Management Regulations.

Facility Description

Tennsco manufactures metal welded cabinets, lockers, shop equipment and filing cabinets. Tennsco was originally Diebold Company and began operation in 1955. In January 1962, Diebold sold the company and it became Tennsco. Tennsco is comprised of six separate facilities located in Dickson and employs approximately 300 people. Plant 2/3, the object of this inspection, consists of two buildings located on one contiuous site and is considered one facility, has one EPA identification number, and is referred to as Plant 2/3 to acknowledge that there are two production buildings on the site. The Plant 2/3 buildings were acquired in 1980 and production began around that time. The production processes

used at Plant 2/3 include stamping, welding, shaping and painting. The hazardous wastes are generated from the painting processes. The paint processes used in Plant 2 of the Plant 2/3 facility include electrostatic spray paint booths, hand spray areas, and robotics spray areas. The paint processes used at Plant 3 of the Plant 2/3 facility include an electrostatic disk system, a hand spray area and a high solids baking enamel paint. A new powder paint system is being installed and expected to be operating in the near future. Tennsco anticipates a significant hazardous waste reduction to result from the change to the powder paint system. Paint waste from overspray and waste from cleaning paint equipment are the hazardous waste generated from the painting processes. Drums used for satellite accumulation of these hazardous wastes are located near the painting equipment. When possible, paint wastes are reused by blending with new paint. Waste not reused is shipped off site as hazardous waste. A review of the annual report data submitted in 1995 shows Tennsco Plant 2/3 generated over 1000 kg of hazardous waste per month for 12 months in 1994. A review of the manifest shows M & M Chemical and Equipment Company and Fisher Industrial Services were used for transportation, treatment and/or disposal of their hazardous waste.

A small amount of waste oil is generated from equipment maintenance. This is handled by Industrial Oil Service and M & M Chemical and Equipment Company.

Findings

The following violations were noted during this inspection:

Rule 1200-1-11-.03(4)(c)

2. Except as provided in parts 6, 7 and 8 of this subparagraph, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:

   (ii) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;

   (iii) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste".

The main hazardous waste accumulation area where hazardous waste is accumulated prior to off-site shipment was found to have, based on Mr. Self's and my count, 36 drums containing hazardous waste which had no labels, hazardous waste markings and were not marked with the required accumulation date. This violation is considered high priority and subject to continued enforcement action irrespective of the correction date given in the accompanying Notice of Violation.

Take the necessary steps to see that all drums and containers of hazardous waste are always properly marked, labeled and dated.

Rule 1200-1-11-.05(3)

(c) Required Equipment - All facilities must be equipped with the following, unless none of the hazardous posed by waste handled at the facility could require a particular kind of equipment specified below:

1. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;

2. A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police department, fire department, or State of local emergency response teams;

3. Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

The main hazardous waste accumulation and storage area between the fabricating building and paint storage building did not have an alarm or emergency communication system immediately available at the scene of operations and adequate spill control equipment was not provided.

If a phone or similar devise is used for emergency communication it should be located near enough to the accumulation area to be immediately available. If a two-way radio system is used a definite procedure for its use should be established to insure it will be effective and in good working condition if needed. This procedure should be demonstrable at inspections.

Rule 1200-1-11-.05(3)

(f) Required Aisle Space - The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Aisle space for unobstructed movement of emergency equipment was not provided in the hazardous waste accumulation area.

The hazardous waste drums and containers in the accumulation area should be organized and maintained so that there is adequate aisle space for unobstructed access by emergency equipment and so labels, markings, etc., are clearly visible. A definite area or space where hazardous waste containers will be placed should be designated. Signs, painted lines, fences and similar items are useful in accomplishing this.

Rule 1200-1-11-.05(9)

(e) Inspections - The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

Weekly inspections of hazardous waste containers and the hazardous waste accumulation area and a log of these inspections was not done.

Inspect the hazardous waste accumulation area and containers at least once a week and maintain a log which will at least include date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions.

Rule 1200-1-11-.03(4)(e)

5. (i) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acute hazardous waste listed in Rule 1200-1-11-.02(4)(b), (c), or (d)5 in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with part 2 of this subparagraph provided he:

(II) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Satellite containers used for the accumulation of hazardous waste near the point of generation were not marked "Hazardous Waste".

Mark all containers used to accumulate and/or collect hazardous waste with the words "Hazardous Waste".

The contingency plan that was reviewed at this inspection was dated March 1993. It is recommended this plan be reviewed and up dated as needed. A record of this review should be attached to the plan.

The Waste Reduction Act of 1990 requires that an annual progress report be completed which shall:

(1) Analyze and quantify progress made, if any, in hazardous waste reduction, relative to each performance goal established under Section 305(b); and

(2) Set forth amendments, if needed, to the hazardous waste reduction plan and explain the need for the amendments.

Complete a waste reduction progress report which includes the above information.

I appreciate the time and cooperation I was given during my inspection. If there are any questions regarding this report contact Tom Yates at (615) 299-9922.

Signed

Tom Yates

Name of Inspector

Feb. 12, 1996

Date

TDY/Tenn188A/db

cc: Solid Waste Management Central Office
U.S.E.P.A. -- Region IV

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

1/9/97

DSWM
L&C

IN THE MATTER OF:	)	
	)	
TENNSCO CORP.	)	DIVISION OF SOLID WASTE MANAGEMENT
	)	
	)	SWM CASE NO. 96-H0023
	)	
RESPONDENT	)	
	)	

ORDER AND ASSESSMENT

Comes now, Justin P. Wilson, Commissioner of the Department of Environment and Conservation, and states that.

PARTIES

I.

Justin P. Wilson is the Commissioner of the Tennessee Department of Environment and Conservation, (the 'Department') and among other duties and responsibilities, is charged with the responsibility for administering and enforcing the Tennessee Hazardous Waste Management Act (T.C.A. Section 68-212-101 et seq.).

II.

Tom Tiesler is the duly appointed Director of the Division of Solid Waste Management (the 'Division') He has received written delegation to administer and enforce particular aspects of the Tennessee Hazardous Waste Management Act.

III.

Tennsco Corp (hereinafter referred to as the 'Respondent" or "Tennsco'), is an active company conducting business in Dickson, Tennessee. Its agent for service of process is Mr Keith C Stanton, 201 Tennsco Drive, Dickson, Tennessee 37055.

JURISDICTION

IV.

Pursuant to Tennessee Code Annotated (hereinafter 'T.C.A.) Section 68-212-114(b), the Commissioner may assess a civil penalty of up to FIFTY THOUSAND

DOLLARS ($50,000) per day for each day of violation of the Tennessee Hazardous Waste Management Act (the "Act"), or any rules and regulations promulgated pursuant to the Act, against any person who violates the Act or rules or regulations. In addition, the same statute authorizes the Commissioner to assess damages which may include any reasonable expenses incurred in investigating and enforcing the Act. T.C.A. Section 68-212-111 authorizes the Commissioner or his authorized representative to issue an Order for Correction to responsible parties for violations of the Act or rules or regulations promulgated thereunder.

V.

The Respondent is a "person" within the meaning of T.C.A. Section 68-212-104 and has violated provisions of the Act and the rules.

FACTS

VI.

The Respondent is a manufacturer of metal welded cabinets, lockers, shop equipment, and filing cabinets. The facility is comprised of six separate facilities located in Dickson, and employs approximately 300 people. Plant 2/3, the object of the inspection, consists of two buildings located on one continuous site and is considered one facility, with one EPA identification number. It is referred to as Plant 2/3 to acknowledge that there are two production buildings on the site. The facility is a fully regulated generator, and as such, may store hazardous waste on-site for less than 90 days without a permit, provided that specific provisions of the hazardous waste regulations are met. The Respondent's EPA identification number is TND 98-004-5390.

VII.

On February 7, 1996, a routine Compliance Evaluation Inspection (CEI) of a Large Quantity Hazardous Waste Generator was conducted at Tennsco Plant 2/3 in Dickson, Tennessee. On February 12, 1996, the Division issued Tennsco a Notice of Violation (NOV) for the violations cited on the aforementioned inspection. Following issuance of the NOV, the facility was invited to meet with the Division in a show cause meeting to discuss the alleged violations. The meeting was held on May 23, 1996. During the show cause meeting, a review of the hazardous waste manifests indicated that the company had complied with the 90-day storage requirements, but not the labeling requirements. In fact, the facility failed to properly label and place accumulation start

dates on thirty-six (36) drums. The other cited violations were demonstrated to have come under compliance since the inspection.

VIOLATIONS

VIII.

The Respondent is charged with having violated the following regulations promulgated under the Tennessee Hazardous Waste Management Act and its regulations.

IX.

By failing to properly label and date accumulation storage drums, the facility violated Rule 1200-1-11-.03(4)(e)2, which states:

> Except as provided in parts 6,7, and 8 of this subparagraph, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:
> (ii) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
> (iii) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste."

X.

By failing to document inspections on the hazardous waste accumulation area, the facility violated Rule 1200-1-11-.03(4)(e)2(i)(I) which in turn refers to 40 CFR 265.174, incorporated by reference at Rule 1200-1-11-.05(9)(a), which states:

> The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

XI.

By failing to have installed the proper emergency alarm system, communications equipment, and spill control equipment, the facility violated Rule 1200-1-11-.03(4)(e)2(iv) which in turn refers to 40 CFR 265.32, incorporated by reference at Rule 1200-1-11-.05(3)(a), which states:

> All facilities must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:
> (a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;
> (b) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency

assistance from local police departments, fire departments, or State or local emergency response teams;

(c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and

(d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

XII.

By failing to provide adequate aisle space in the accumulation area, the facility violated Rule 1200-1-11-.03(4)(e)2(iv) which in turn refers to 40 CFR 265.35, incorporated by reference at Rule 1200-1-11-.05(3)(a), which states:

> The owner or operator must maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

ORDER

WHEREFORE, PREMISES CONSIDERED, pursuant to the authority vested by T.C.A. Section 68-212-114 and T.C.A. Section 68-212-111, I, Tom Tiesler, acting as the authorized representative of the Commissioner, hereby, after proper consideration of the harm done to the public health or the environment, the economic benefit gained by the violator, the amount of effort put forth by the violator to attain compliance, and any unusual or extraordinary costs incurred by the Commissioner, ORDER that:

1. The Respondent shall fully comply with Act and Division Regulations in the future.

2. The Respondent is assessed a CIVIL PENALTY in the amount of ONE THOUSAND DOLLARS ($1,000.00).

3. The above assessed CIVIL PENALTY shall be paid to the Tennessee Department of Environment and Conservation within thirty (30) days of the receipt of this ORDER.

Issued this 8th day of January, 1997 in the office of the Director of the Division of Solid Waste Management, Tennessee Department of Environment and Conservation.

Tom Tiesler, Director
Division of Solid Waste Management
Tennessee Department of Environment
and Conservation

NOTICE OF RIGHTS

The Respondent is hereby advised that in accordance with T.C.A. Section 68-212-113 it may secure a review of the necessity for or reasonableness of this ORDER by filing with the Commissioner, a written petition, setting forth the grounds and reasons for objection and asking for a hearing before the Solid Waste Disposal Control Board. This ORDER shall become final and not subject to review unless the Respondent petitions for a hearing within thirty (30) days after this ORDER is served. The hearing will be conducted in accordance with the Tennessee Uniform Administrative Procedures Act, T.C.A. 4-5-301 et seq.

All correspondence pertaining to this matter should be addressed to Charles Allen, L&C Tower, 5th Floor, 401 Church Street, Nashville, Tennessee 37243-1535, Phone (615) 532-0780.

Charles Allen
Enforcement Section

96 STATE OF TENNESSEE 96

HAZARDOUS WASTE CASE PROFILE REPORT

DSWM LEC

P-P MAKING WATCH NO

The named facility was cited in 96 for these violations:

. At that time, a penalty of $1000.00 was assessed. Previous repeat violations may constitute the status of a Significant Non Compliant facility (SNC).

The archived case included these notes:

CITY TENNESCO

NASH [illegible] 96 HBCA

END CLOSED

201 TENNESCO DRIVE

DICKSON TN 37056

COUNTY: DICKSON

COUNTY CODE: 43

INSPECTION CROSS REFERENCES

95SEQ

96SEQ

97SEQ

Narrative

An inspection was conducted on 2/7/96 by T YATES (615) 299-8451 of the NASH field office. A Notice of Violation was issued 2/12/96 detailing 5 violations. An Enforcement Action Request (EAR) dated 2/27/96 was received in Enforcement on 3/1/96. The case was assigned to ALLEN-094R on The target date for completion of this case is 8/5/96.

This case was closed on 1/30/97

THE FACILITY WAS CHARGED WITH THE FOLLOWING VIOLATIONS:

	code	violation	violation condition	1200 code	CFR	violation status	
1	C1	C1- CONTAINLABEL	55 DRMS NO HW LABEL	1200-1-11-.03(4)(a)(6)(i)(I)	265.17	CLOSED	CORRECTED
2	C6	C6A- ACCUMDATE	55 DRMS NO ACC DATE	1200-1-11-.03(4)(a)(6)(iv)(I)	262.34(a)(2)	CLOSED	CORRECTED
3	D8	D8- CONTPLANS	NO EMER ALRM, COMM EQUIPT, SPLL	1200-1-11-.05(4)(a)(1)	265.3	CLOSED	CORRECTED
4	D9	D9- AISLESPACE	INSUFF AISLE SPCE HW ACCUM	1200-1-11-.03(4)(a)(2)(v)	265.35	CLOSED	CORRECTED
5	D9	D9- INSTCOMPCT	INSPCTNS NOT DONE HW ACC AREA	1200-1-11-.03(4)(a)(6)(i)	265.174	CLOSED	CORRECTED

CASE CLOSED

Violations an "R" indicate a REPEAT VIOLATION

TOTAL VIOLATIONS 5

TOTAL [illegible]

OUTSTANDING HPV

OUTSTANDING VIOLATIONS

ORIGINAL PENALTY $1000.00

CONTINGENT

TOWARDS

AMOUNT SUSPENDED

FINAL PENALTY $1000.00

DATE PAID: 1/27/97

AMOUNT PAID $1000.00

BALANCE OWED $0.00

STATUS

BALANCE ZEROED

OR ORD 1/9/97

COMM ORD

AGREED ORDER

DATE ORDER SIGNED: [redacted]

ORDER STATUS

CLOSED

DATE APPEALED

OGC

DATE SENT TO OGC

ATTORNEY

[illegible] WILL [illegible] TN, [illegible], CASE WAS CLOSED AS INDICATED. THEN AN ORDER APPEARED WITH A PAYMENT. RECORD WAS ALTERED TO SHOW [illegible]

old UAR enforcement deleted

Hazardous Waste Notification

DSWM L&C

Tennessee Department of Environment and Conservation: Division of Solid Waste Management
Fifth Floor, L & C Tower: 401 Church Street: Nashville, TN 37243-1535

If below is incorrect, please change, certify and return. Retain a copy of any changes.

1. Organization's full, legal name TENNSCO CORPORATION PLANT 2/3			Installation identification number TND 98-084-5390	
2. Mailing address PO BOX 606	City DICKSON	State TN	Zip code 37055	
3 a. Site address FIRST & PICKETT STS	City	State	Zip code 37055	County name Dickson
b. Latitude (degrees, minutes & seconds) 36.0500	Longitude (degrees, minutes & seconds) 87.2409			
4. Owner name (may be corporation or company name) LESTER SPEYER		Type	Phone with area code (615) 446-8000	
5. Manager or operator name MICKEY SELF		Type	Phone with area code (615) 446-8000	
6. Principal technical contact MICKEY SELF	FAX number with area code		Phone with area code (615) 446-8000	
7. Number of employees 300	Year operation began 1958	SIC codes (Primary SIC first.etc.) 2542,		Job shop Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	MICKEY SELF	ALL TIMES	(615) 446-8000
b.	#ROY STINSON	ALL TIMES	(615) 446-4564
c.		HOME	(615) 446-9432
d.		HOME	(615) 789-5618

9. Do you receive RCRA hazardous waste from offsite and recycle it? Yes ( ), No ( ).

10. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
William B. Self	EXECUTIVE ASST.	1-7-98

*** Below is for Department use only ***

11. Date received	County code	Priority	Generator	Small Generator	Special status
01-30-1998	22		Yes No Y	Yes No N	

12. Date closed	TSDR status	Transporter status

13. Comments

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility TENNSCO CORPORATION PLANT 2/3	**Installation identification number** TND 98-084-5390
2. **Waste name**. Use standard name from regulations whenever possible. LIQUID WASTE PAINT	WASTE STREAM NUMBER 4

3. Give the **years** that this waste has been generated. e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation
1992		Continuous Accidental/ One time Various (V)

4. Circle all appropriate **hazard criteria** below. Ignitable (a). EP toxic (b). Corrosive (c). Reactive (e). Other toxic (f). TCLP (g)	EPA **waste codes**. (Primary first; six maximum.)	**SIC code** for generating process.
(f)	D001, F003, F005	2542,

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Liq-Othr (3)	50		10.000	0.0	11,500.0

6. **Generation rates** in kilograms. Monthly ~~maximum~~ (kg)	Annual average ~~(kg)~~	Maximum stored onsite ~~(kg)~~	Maximum days stored
~~25,000.0~~ 5500	~~70,000.0~~ 12,000	~~50,000.0~~ 10,000	90

7. **DOT shipping** name	DOT hazard class		DOT ID code
WASTE FLAMMABLE LIQUID	ORM-D	10	UN1993

8. Describe the **generation process**.
COLLECTED AND TEMPORARILY STORED IN 55 GALLON DRUMS. (1) VARIES TO NO GENERATION

9. **Chemical Characteristics**.

pH	Flash point	Reactive code	**Concentration units**. Use PPM for TCLP and EP Toxic wastes % volume( ). % weight( ). PPM( )
	140F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A.		
B.		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition**. Use the Waste Management Method Codes on page 6 of the instructions.

T50

RECEIVED
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify and return regardless. Retain a copy for your records.

1. **Organization's full name** at facility TENNSCO CORPORATION PLANT 2/3	**Installation identification number** THD 98-084-5390
2. **Waste name.** Use standard name from regulations whenever possible. WASTE PAINT SOLID	WASTE STREAM NUMBER 5

3. Give the **years** that this waste has been generated, e.g. 1975, 1982-. 1992	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation Continuous Accidental/ Various One time ____ (V)
4. Circle all appropriate **hazard criteria** below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g)AF	EPA **waste codes.** (Primary first; six maximum.) D001, F003, F005	**SIC code** for generating process. 2542,

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content(PPM)	BTU per pound
Sld:Othr (9)	1 + 1		10.000	0.0	12,500.0

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
20,000.0	65,000.0	50,000.0	90

7. **DOT shipping** name	DOT hazard class		DOT ID code
WASTE FLAMMABLE SOLID	Explosives	01	

8. Describe the **generation process.**

NO WASTE GENERATED IN 1997

9. **Chemical Characteristics.** pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ), % weight( ), PPM( )
	140F		

Hazardous constituents. Give range of values at right.	lower value	upper value
A.		
B.		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

RECEIVED
JAN 9
Solid & Hazardous Waste

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation. Division of Solid Waste Management
Fifth Floor. L & C Tower. 401 Church Street. Nashville. TN 37243-1535

NEW

Organization's full name at facility TENNSCO CORPORATION PLANT 2/3	**Installation identification number** TND-98-084-5390
2. **Waste name.** Use standard name from regulations whenever possible. WASTE PHOSPHORIC ACID SOLUTION	WASTE STREAM NUMBER 7

3. Give the **years** that this waste has been generated. e.g. 1975. 1982-.	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation
1997	12-31-97	Continuous ~~Accidental~~/ Various (One time)

4. Circle all appropriate **hazard criteria** below. Ignitable (a). EP toxic (b). Corrosive (c). Reactive (e). Other toxic (f). TCLP (g).	EPA **waste codes**. (Primary first: six maximum.)	**SIC code** for generating process.
C	D002	2542

5. **Physical form** code	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel: chlorine content(PPM)	BTU per pound
3 LIQUID		N/A	8.32	N/A	N/A

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
510	510	510	90

7. **DOT shipping** name	DOT hazard class	DOT ID code
PHOSPHORIC ACID WASTE	2	UN3264

8. Describe the **generation process.**

RAW MATERIAL (PHOSPHORIC ACID USED IN MANUFACTURING) DECLARED A WASTE BECAUSE NO LONGER NEEDED.

9. **Chemical Characteristics.** pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes % volume( ). % weight( ). PPM( )
<1.0			

Hazardous constituents. Give range of values at right.	lower value	upper value
A. PHOSPHORIC ACID	N/A	N/A
B.		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

NEUTRALIZATION - T31

RECEIVED JAN 9 Solid & Hazardous Waste

CN-0773 (Rev. 11/95) Form Continues on the Back RDA 2203 and 2497

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

NEW

Organization's full name at facility: TENNSCO CORPORATION PLANT 2/3	**Installation identification number**: TND-98-084-5390
2. **Waste name.** Use standard name from regulations whenever possible: WASTE CAUSTIC SOLUTION	WASTE STREAM NUMBER: 6

3. Give the years that this waste has been generated, e.g. 1975, 1982-.	Date no longer generated. (MM/DD/YY)	Annual **Frequency** of generation
1997	—	Continuous, Accidental/ One time, (Various)

4. Circle all appropriate **hazard criteria** below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g).	EPA **waste codes.** (Primary first; six maximum.)	SIC code for generating process.
C	D002	2542

5. **Physical form code**	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
LIQUID 2		~70	8.32	N/A	N/A

6. **Generation rates** in kilograms. Monthly maximum (kg)	Annual average (kg)	Maximum stored onsite (kg)	Maximum days stored
300	300	250-300	90

7. **DOT shipping name**	DOT hazard class	DOT ID code
WASTE SODIUM HYDROXIDE SOLUTION	2	UN 1824

8. Describe the **generation process.**

CAUSTIC USED TO CLEAN PAINT LINE

9. **Chemical Characteristics.**

pH	Flash point	Reactive code	**Concentration units.** Use PPM for TCLP and EP Toxic wastes. % volume( ), % weight( ), PPM( )
~~X~~12.0	—	—	

Hazardous constituents. Give range of values at right.	lower value	upper value
A. NA OH	N/A	N/A
B.		
C.		
D.		
E.		

10. Describe how you have **managed** or intend to manage this waste **through final disposition.** Use the Waste Management Method Codes on page 6 of the instructions.

NEUTRALIZATION — T31

RECEIVED
JA
Solid & Hazardous Waste

RECEIVED
DIV SOLID WASTE MGT

JAN 21 1999

Group No._____ File No._____

ID No. TND 98-084-5390

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE FIELD OPERATIONS
NASHVILLE ENVIRONMENTAL FIELD OFFICE
3000 MORGAN ROAD
JOELTON 37080

January 13, 1999

CERTIFIED MAIL Z 137 708 914
RETURN RECEIPT REQUESTED

Mr. Rocky Bowker, Environmental Coordinator
Tennsco
201 Tennsco Drive
P.O. Box 1888
Dickson, TN 37050-1888

TND 98-~~004~~08-5390

RE: NOTICE OF VIOLATION
Tennessee Hazardous Waste Management Act

Dear Mr. Bowker:

This letter confirms the observations and recommendations which were made during the Large Quantity Hazardous Waste Generator Inspection concerning your facility on January 6, 1999. The attached inspection report details the violations which were noted during the inspection.

Immediate action should be initiated to correct these violations. A follow-up inspection will be made after February 8, 1999 to verify that the appropriate corrective action has been taken.

If you have any questions concerning this letter or any part of the inspection report, please do not hesitate to contact me at (615) 299-9922.

Sincerely,

Tom Yates

Tom Yates
Division of Solid Waste Management

TDY/bbm/tenn9184.doc

cc: DSWM - Central Office
U.S.E.P.A., Region IV

HAZARDOUS WASTE INSPECTION REPORT

SITE/PHYSICAL LOCATION:

Tennsco Plant 2/3
TND 98-004-5390
P.O. Box 606
First & Pickett Street
Dickson, TN 37056
Dickson County

PRIMARY CONTACT:

Rocky Bowker, Environmental Coordinator
Tennsco
P.O. Box 1888
201 Tennsco Drive
Dickson, TN 37056-1888
(615) 446-8000
FAX (615) 446-7224

DATE/TIME OF INSPECTION:

January 6, 1999
approximately 10:00 a.m.

INSPECTION PARTICIPANTS:

Tom Yates, Tennessee Department of Environment and Conservation, Division of Solid Waste Management, Nashville/Joelton Environmental Assistance Center
Rocky Bowker, Environmental Coordinator, Tennsco
Charles Carr, Paint Supervisor, Tennsco

REPORT PREPARED BY:

Tom Yates
Tennessee Department of Environment and Conservation
Division of Solid Waste Management
Nashville/Joelton Environmental Assistance Center
3000 Morgan Road
Joelton, TN 37080
Phone: (615) 299-9922
Fax: (615) 299-8749

PURPOSE OF INSPECTION:

This inspection was conducted to evaluate the Tennsco Plant 2/3 compliance with the applicable requirements of the Rules and Regulations promulgated pursuant to the Hazardous Waste Management Act, T.C.A. 68-212-101 et. seq. and the "Tennessee Waste Reduction Act," T.C.A. 68-212-301 et. seq.

FACILITY DESCRIPTION:

Tennsco manufactures metal welded cabinets, lockers, shop equipment and filing cabinets. Tennsco was originally Diebold Company and began operation in 1958. In January, 1962, Diebold sold the company and it became Tennsco. Tennsco is comprised of six separate facilities located in Dickson and employs approximately 300 people. Plant 2/3, the object of this inspection, consists of two buildings located on one continuous site and is considered one facility, has one EPA identification number. It is referred to as Plant 2/3 to acknowledge that there are two production buildings on site. The Plant 2/3 buildings were acquired in 1980 and production began around that time. The production processes used at Plant 2/3 include stamping, welding, shaping and painting. The administrative offices are located at 201 Tennsco Drive and this is the location of Rocky Bowker's (the inspection contact) office.

The Standard Industrial Classification (SIC) codes used by Tennsco include 2542, 2851, 3316, 3429 and 3452.

Tennsco reported generating over 1000 kg of hazardous waste in at least each of 3 months on their most recent annual report. Based on this information, they are classified as a large quantity hazardous waste generator.

INSPECTION FINDINGS:

This inspection consisted of a records review and a facility inspection. The records review included annual reports, manifests, contingency plan, waste reduction plan, training records, and inspection logs. The facility inspection included the waste generation processes, satellite accumulation, the less than 90 day accumulation area, and used oil containers.

Hazardous waste is generated from Tennsco's wet paint operations. The following hazardous waste stream is currently generated:

Waste Stream #4: Paint/Solvent
EPA Waste Codes: D001, F003, F005
Estimated Monthly Maximum: 5500 kg

Generation Process: Cleaning of wet paint line equipment. Two satellite containers are in use for accumulation of this waste. One is located at what is known as the L & T paint line and the other is at what is known as the K-D line. Neither of these satellite containers were properly marked with the words "Hazardous Waste".
Major Hazardous Constituents: Methyl ethyl ketone, toluene

A significant amount of paint waste like material generated by the liquid paint operation in Plant 3 is suitable to be used as an ingredient to make new paint. This paint material is collected in a 300 gallon tote tank provided by the paint manufacturer and is returned to them when it is full. The paint manufacturer uses this paint material in manufacturing new paint.

A one time generation of a caustic soda waste occurred in 1997 from the hardening of a cleaning powder, which caused it to be unusable. This situation is now corrected by the changing to a liquid cleaner.

The less than 90 day accumulation area is in a separate building adjacent to the plant. At this inspection, only one drum marked "Hazardous Waste" was seen in the area. The area was disorganized and housekeeping was generally poor. This condition was in part due to preparation for moving the less than 90 day accumulation area to a new structure which is very near completion. A review of the regulations pertaining to the emergency equipment, alarms communication, and other requirements for hazardous waste accumulation areas is recommended to ascertain that the new area is in compliance.

It is also noted that Tennsco is in the process of converting their wet painting operations to powder painting. The elimination of wet painting has reduced their hazardous generation. It was explained that the intention is to eventually convert all painting to powder painting.

Containers used to accumulate used oil had not been marked with the words "Used Oil".

The records review revealed that no hazardous waste training was done in 1998, and therefore, the regulation requirement to conduct annual hazardous waste training had not been met.

VIOLATIONS:

Rule 1200-1-11-.05(2)(g)3 states in part:

Facility personnel must take part in an annual review of the training required in part 1 of this subparagraph. Part 1 (iii) states:

(iii) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by

familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:

(I) Procedures for using, inspection, repairing, and replacing facility emergency and monitoring equipment;

(II) Key parameters for automatic waste feed cut-off systems;

(III) Communications or alarm systems;

(IV) Response to fires or explosions;

(V) Response to ground-water contamination incidents; and

(VI) Shutdown of operations.

Based on the training records reviewed, the last hazardous waste training was done approximately in June, 1997.

Rule 1200-1-11-.03(4)(e)2.(iii) states in part:

While hazardous waste is being accumulated on-site, each container and tank used for that purpose be labeled or marked clearly with the words "Hazardous Waste".

The satellite containers located at the paint lines known as L & T paint line and K-D paint line were not marked "Hazardous Waste".

Rule 1200-1-11-.11(3)(c)3(i) states:

Containers and aboveground tanks used to store oil at generator facilities, must be labeled or marked clearly with the words "Used Oil".

The containers seen that were used to accumulate used oil were not properly marked.

TCA 68-212-306 "Tennessee Hazardous Waste Reduction Act of 1990" states in part:

68-212-306. Annual progress report.--(a) All generators shall annually review their waste reduction plan and complete a hazardous waste reduction progress report which shall:

(1) Analyze and quantify progress made, if any, in hazardous waste reduction, relative to each performance goal established under § 68-212-305(b); and

(2) Set forth amendments, if needed, to the hazardous waste reduction plan and explain the need for the amendments.

(b) Except for the information reported to the department under § 68-212-308, the annual progress report shall be retained at the facility and shall not be considered a public record under title 10, chapter 7, part 5. However, the generator shall permit any officer, employee or representative of the department at all reasonable times to have access to the annual progress report.

(c) Large quantity generators shall complete the first annual progress report required under subsection (a) on or before March 1, 1993. Small quantity generators shall complete the first annual progress report required under subsection (a) on or before March 1, 1995. [Acts 1990, ch. 754, x 7; T.C.A., § 68-46-306.]

A hazardous waste reduction plan annual progress report, as required by the Waste Reduction Act of 1990, was not available for review.

REMARKS:

A fax from Rocky Bowker, dated January 7, 1999, addressing some of the questions that came up during the inspection, was received. With regard to paint waste generated at Plant 1, the fax verified this waste was non-hazardous and had been granted a special waste approval. The fax also explained the one time generation of caustic soda, EPA ID code D002 waste. In addition, it confirmed that no annual training had been done in 1998, and that steps were being taken to schedule training by the end of the month.

I appreciate the time and cooperation I was given during the inspection. If there are any questions regarding this report, contact Tom Yates at (615) 299-9922.

SIGNED: Tom Yates DATE: Jan. 19, 1999

REVIEWED: [illegible] DATE: Jan 19, 1999

cc: DSWM-Central Office
U.S.E.P.A., Region IV

Hazardous Waste Notification DSWM LEC JAN 05, 1990

Mark changes on this form. Full instructions are given with Form PH-2019A.

1. Organization's name
WABASH ALLOYS DIVISON OF CONNELL LIMITED PARTNERSHIP
| EPA ID CODE
TND 98-776-6524

2. Mailing address
R.R. 8 SOUTH PRINTWOOD DR
| City
DICKSON
| State|Zip
TN 37055

3. Physical location or address
R.R. 8 SOUTH PRINTWOOD DR
| County name
DICKSON

Latitude | Longitude
36.2300 87.2100

4. Owner name
CONNELL LIMITED PARTNERSHIP
| Phone
(617) 567-2600

5. Manager or operator name
DENNY LUMA (PLANT MANAGER)
| Phone
(615) 446-0600

6. Principal technical contact
DENNY LUMA
| Phone
(615) 446-0600

7. Number of employees | Year began | SIC codes | Job shop
60 1987 3341, , , NO

8. Emergency contacts

Name	Time period covered	Phone
A DENNY LUMA	24 HRS	(615)446-0600
B ANDY LUNN	24 HRS	(615)446-0600
C PAUL GAMARY	24 HRS	(615)446-0600
D EDWIN J STOLARZ	24 HRS	(219)563-7461

9. Current environmental permits for air, water, and radiol
Give permit type, number and expiration date. In a range of related permits, summarize by giving the first and last permit number.
AIR PERMIT - 8026738P - EXP 3/1/90^AIR PERMIT - 8025574P - EXP 3/1/94^

10. Check hazardous waste fuel burning activities below.
Fuel blending or marketing a( ) Fuel burning. . . . c( )
Transporting fuel . . . b( )

11. I certify that this information is true, accurate and complete.
Signature of authorized representative, title, date

Dennis B. Luma Plant Manager 2/23/90

Below is for Department use only.

12. Date rcvd	County	Priority	Generator	Small Gen.	Special status
2-26-90			Yes No	Yes No	

13. Date closed	Date regulated	Date deregulated	Insp. Freq.
/00/00	/00/00	/00/00	

14. Comments

Hazardous Waste Stream Report - Front JAN 05, 1990

Mark changes on this form. Full instructions are given with Form PH-2022.

1. Organization's name | EPA ID CODE
WABASH ALLOYS DIVISON OF CONNELL LIMITED PARTNERSHIP | TND 98-776-6524

2. Waste name. | Waste stream ID
DUST FROM FURNACE BAGHOUSE | 1

3. Give years waste generated | Date stopped | Frequency of generation
1988 - [redacted] | /00/00 | Continuously

4. Mark all appropriate hazard criteria below. | EPA waste codes | SIC
Ignitable (a), EP toxic (b), Corrosive (c),
Reactive (e), Other toxic (f)
CODES: B | D006D008 | 3341

5. Physical form | % Solid | % Water | Lb./gal. | Chlorine PPM | BTU/lb.
GRANULAR SOLID | 100.0 | 0 | [redacted] 3.96 | .0 | .0

6. Generation rates in kilograms.
Monthly maximum | Annual average | Max. amount stored | Max. days stored
4545 [redacted] | 33,000 [redacted] | 13,600 [redacted] | 90

7. DOT shipping name | DOT hazard class | DOT ID code
RQ HAZARDOUS WASTE, SOLID, NOS (D006, D008) | O R M - E | NA9189

8. Describe generation process.
BAGHOUSE TYPE DUST COLLECTOR FROM #2 AND #3 SECONDARY^ALUMINUM GAS FIRED REVERBERATORY FURNACES.^

** ANNUAL REPORT SECTION ** LINES 9-11

9.

Report Year	Amount generated during year (kg)	Amount on site on first day (kg)	Amount on site on last day (kg)
1989	32,727	42,345	[redacted] 4090

	Amount Handled by site		TSDF handling/Waste management methods
A	OFFSITE: [redacted] 76982	N	D80
B	ONSITE:	Y	
C	ONSITE:	Y	
D	ONSITE:	Y	

10. Check the efforts undertaken to reduce the volume and toxicity in the generation of this waste during the reported year.

a. Reformulation/redesign of product a( )
b. In process recycling . . . . . b( )
c. Equipment/technology modification c( )
d. Substituting raw materials d( )
e. Improved operations. . . . e( )
f. No effort. . . . . f(x)
g. Other - explain below: . . . . . g( )

11. Describe changes in volume and toxicity that those reduction efforts checked in line 10 produced last year compared to the previous year.

a. more toxic-a( ) b. less toxic-b( ) c. No change-c(x). | Amt of Reduction 0 (kg)

DSWM L!C

Hazardous Waste Notification

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

If below is incorrect, please change, correct and return. Return a copy of any changes.

1. Organization's full legal name: WABASH ALLOYS DIVISON OF CONNELL LIMITED PARTNERSHIP
   EPA identification code: TNO 98-776-6524

2. Mailing address: 600 PRINTWOOD DR | City: DICKSON | State: TN | Zip code: 37055

3. a. Site address: 600 PRINTWOOD DR, DICKSON, TN 37055 | City: | State: | Zip code: | County name: Dickson

   b. Latitude (degrees, minutes & seconds): 36.2300 | Longitude (degrees, minutes & seconds): 87.2100

4. Owner name: CONNELL LIMITED PARTNERSHIP | Phone with area code: (617)567-2600

5. Manager or operator name: DENNY LUNA (PLANT MANAGER) | Phone with area code: (615)446-0600

6. Principal technical contact: DENNY LUNA | Phone with area code: (615)446-0600

7. Number of employees: 67 | Year operation began: 1987 | SIC codes (Primary SIC first, etc.): 3341, , , | Job shop: Yes No (N)

8. Emergency contacts for 24 hours per day and 7 days per week

	Name	Time period covered	Phone with area code
a.	DENNY LUNA	24 HRS	(615) 446-0600
b.	ANDY LUNN	24 HRS	(615) 446-0600
c.	PAUL GANARY	24 HRS	(615) 446-0600
d.	EDWIN J STOLARZ	24 HRS	(219) 563-7461

9. List current environmental (air, water, and radiological) permits. Give permit type, source, number and expiration date. In a range of related permits, give the first and last permit number.

   STATE AIR PERMIT . 035313P exp. 3/1/97; 733198P exp. 3/1/94; 933707P under renewal 931749P under renewal

10. Check the activities below you are engaged in related to recycling or burning hazardous waste as a fuel.
    a. Fuel blending or marketing of hazardous waste as a fuel. . . . . a( )
    b. Transporting hazardous waste as fuel . b( )
    c. Burning hazardous waste as fuel . . . c( )

    d. Do you receive RCRA hazardous waste from off-site and recycle it? Yes ( ), No (X).

11. Certify that the information given in this document is true, accurate and complete by signing and dating.

Signature of authorized representative	Title	Date
Dennis B. Luna	Plant Manager	2/18/94

Below is for Department use only

12. Date received	County code	Priority	Generator Yes No	Small Generator Yes No	Special status
3-9-94	22		N	N	

13. Date closed	Date regulated	Date deregulated

14. Comments: Postmarked 2-28-94 DBW

RECEIVED
MAR 09 1994

Hazardous Waste Stream Report

Tennessee Department of Environment and Conservation, Division of Solid Waste Management.
Fifth Floor, L & C Tower, 401 Church Street, Nashville, TN 37243-1535

Please complete and/or correct, certify, and return regardless. Retain a copy for your records.

1. Organization's full name at facility.
WABASH ALLOYS DIVISION OF CONNELL LIMITED PARTNERSHIP

EPA identification code
TND 98-770-6524

2. Waste name. Use standard name from regulations whenever possible.
DUST FROM FURNACE BAGHOUSE

Waste Stream number
1

3. Give the years that this waste has been generated, e.g. 1975, 1982-.
1988- 1991 , 1993

Date no longer generated. (MM/DD/YY)
05/15/93

Frequency of generation
Continuous ~~NO~~ — Accidental/ One time — Various X

4. Circle all appropriate hazard criteria below. Ignitable (a), EP toxic (b), Corrosive (c), Reactive (e), Other toxic (f), TCLP (g)

EPA waste codes. (Primary first; six maximum.)
[illegible]

SIC code for generating process.
3341.

5.

Physical form	% Solid	% Water	Vol. to wt. conversion (pounds/gallon)	If used for fuel, chlorine content (PPM)	BTU per pound
Sludge (8)	100.0	.0	3.760	0.0	0.0

6. Generation rates. Supply all rates in kilograms.

Monthly maximum (kg)	~~Annual average~~ (kg)	Maximum amount stored on-site (kg)	Maximum days stored
7,273.0	12,356	12,356	90

7.

DOT shipping name	DOT hazard class		DOT ID code
RQ HAZARDOUS WASTE, SOLID, NOS (D006)	0 R M - E	12	NA9189

8. Describe generation process.

Baghouse type dust collector form #2, #3, #4, and #6 secondary aluminum gas fired reverberatory furnaces.

9. Chemical Characteristics.

pH	Flash point	Reactive code	Concentration units. For EP toxic and TCLP wastes, use PPM. % volume( ), % weight( ), PPM(X)
9.5	>200	None	

Major and hazardous constituents. Give range of values at right.	lower value	upper value
a. ~~XXXXXXXXX~~	~~XXXXX~~	~~XXXXXX~~
b. CADMIUM (D006)	.013	4.40
c.		
d.		
e.		

10. If this waste is recovered, reclaimed, recycled or reused, describe how.

Printed on recycled paper