

SQUARE D COMPANY

ELECTRICAL AND ADVANCED TECHNOLOGY PRODUCTS

POWER EQUIPMENT DIVISION

317-472-3381



252 NORTH TIPPECANOE

PERU, INDIANA 46970

Certified 808564
IB2
Square D Company
IND 005446547

July 2, 1985

Via Certified Mail

Mr. Dennis Zawodni
State Board of Health
1330 West Michigan St.
P.O. Box 1964
Indianapolis, IN 46206-1964

RE: RCRA Generator Inspection
Square D Company
IND 005446547
Response to Notice of Violation Dated 3-28-85

Mr. Zawodni,

On February 8, 1985 the Peru, IN Square D facility was inspected by Mr. Jeff Blankenberger. Mr. John Bull represented Square D during the inspection. Shortly thereafter, Mr. Bull was assigned to our Smyrna, TN plant and the transferring of his Peru responsibilities left us in somewhat of a state of confusion. To compound the problem, the department head over the hazardous waste area was reassigned in late 1984. I replaced him and I did not begin my new responsibilities in Peru until June 20, 1985.

During this time period, with no department head and during the transition from one hazardous waste coordinator to another, Square D received a notice of violation. Corrective action was begun immediately, but in error, no written explanation of the steps taken to achieve compliance was sent to you.

The following is a summary of the corrective action taken and also the current status with regards to compliance to the RCRA and 320IAC4 regulations.

1. Noted Violation: Hazardous waste was stored by generator for more than ninety (90) days.

Corrective Action: Thirty drums of waste treatment sludge (USEPA Code F006) and one drum of dry spray booth filters (USEPA Code D007) were transported by Metropolitan Environmental, Inc. of Muncie, IN to SCA/Chemical Waste Management/Adams Center Land Fill, Inc. in Fort Wayne, IN on March 13, 1985. Please see the attached copies of the Waste Management Profile Sheets, the Hazardous Waste Manifest #12-18, the Square D Company's purchase order for this disposal, and the transporter's pick-up receipt. In the future, Square D will not store hazardous waste on site for more than 90 days.

JUL 5 9 20 PM '85
DIV. OF ENVIRONMENTAL CONTROL
STATE BOARD OF HEALTH

2. Noted Violation: Hazardous waste containers were not properly closed during accumulation.

Corrective Action: Immediately following the inspection on February 8, 1985, the full drums of accumulated waste treatment sludge were properly sealed. All of the drums of waste accumulated subsequent to the inspection date have been properly closed during the accumulation period and then securely sealed when filling was complete. Square D will continue to properly close containers during accumulation.

3. Noted Violation: Hazardous waste container of ignitable waste was located less than 15 meters (50 feet) from the Company's property line as required by 40 CFR 265.176.

Corrective Action: The drum of ignitable dry spray booth filters was moved to a location greater than 15 meters from the property line, immediately following the inspection. The disposal of the one drum in question was explained above in the corrective action statement of violation No. 1. All containers of flammable or ignitable waste materials are currently, and will continue to be located at distances greater than 15 meters from Square D Company's property lines.

4. Noted Violation: Start of accumulation period was not clearly marked on each container.

Corrective Action: The faded dates were rewritten immediately after inspection on the labels of the drums of hazardous waste. Currently, dates showing start of accumulation for each hazardous waste material are clearly marked on each container and will continue to be so marked.

5. Noted Violation: Hazardous Waste Containers were not clearly marked with the words "Hazardous Waste."

Corrective Action: All containers of materials classified as hazardous wastes were immediately relabeled, are currently and will continue to be clearly labeled, with a label boldly displaying the words, "HAZARDOUS WASTE".

6. Noted Violation: Personnel training records do not include job descriptions as they relate to the employee's involvement with hazardous waste management.

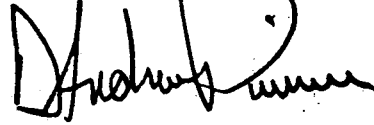
Corrective Action: We are currently in the process of training or retraining all involved employees. Training records will be set up to include each employee's job description as they relate to hazardous Waste Management. Training should be complete and records set up by August 1, 1985.

7. Noted Violation: Personnel have not participated in an annual review of initial training.

Corrective Action: We are currently in the process of training or retraining all involved employees. Training should be complete by August 1, 1985 and will be repeated annually thereafter.

Please let me know if you have questions or if additional information is required.

Regards,
Square D Company

A handwritten signature in dark ink, appearing to read "D. Andrew Purviance", written over the printed name.

D. Andrew Purviance
Manager, Manufacturing Services

DAP/cmp

Waste Management, Inc.

GENERATOR'S WASTE MATERIAL PROFILE SHEET



WASTE PROFILE SHEET CODE

col
TSDR

E55548

A GENERAL INFORMATION

AC-0184-901

GENERATOR NAME: Square D Company TRANSPORTER: Metropolitan Environmental, Inc.
FACILITY ADDRESS: 252 Tippecanoe St. TRANSPORTER PHONE: (419) 586-6638
Peru, IN. 46970 GENERATOR USEPA ID. IND0005446547
GENERATOR STATE ID. _____
TECHNICAL CONTACT: Mr. John Bull TITLE: EPA Coordinator PHONE: (317) 472-3381
NAME OF WASTE: Wastewater treatment sludge
PROCESS GENERATING WASTE: electroplating operation

B PHYSICAL CHARACTERISTICS OF WASTE

COLOR <u>BROWN/GREEN</u>		ODOR <input checked="" type="checkbox"/> NONE <input type="checkbox"/> MILD <input type="checkbox"/> STRONG		PHYSICAL STATE @ 70°F <input checked="" type="checkbox"/> SOLID <input type="checkbox"/> SEMI-SOLID <input type="checkbox"/> LIQUID <input type="checkbox"/> POWDER		LAYERS <input type="checkbox"/> MULTILAYERED <input type="checkbox"/> BI-LAYERED <input checked="" type="checkbox"/> SINGLE PHASED		FREE LIQUIDS <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO VOLUME _____ %	
pH: <input type="checkbox"/> < 2 <input checked="" type="checkbox"/> 7.1-10 <input type="checkbox"/> N/A <input type="checkbox"/> 2-4 <input type="checkbox"/> 10.1-12.5 <input type="checkbox"/> 4.1-6.9 <input type="checkbox"/> > 12.5 <input type="checkbox"/> 7 <input type="checkbox"/> EXACT _____		SPECIFIC GRAVITY <input type="checkbox"/> < .8 <input type="checkbox"/> 1.3-1.4 <input type="checkbox"/> .8-1.0 <input type="checkbox"/> 1.5-1.7 <input type="checkbox"/> 1.1-1.2 <u>N/A</u> <input type="checkbox"/> > 1.7 <input type="checkbox"/> EXACT _____		FLASH POINT <input type="checkbox"/> < 70°F <input checked="" type="checkbox"/> > 200°F <input type="checkbox"/> CLOSED CUP <input type="checkbox"/> 70°F - 100°F <input type="checkbox"/> NO FLASH <input type="checkbox"/> OPEN CUP <input type="checkbox"/> 101°F - 139°F <input type="checkbox"/> EXACT _____ <input checked="" type="checkbox"/> 140°F - 200°F					

C CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%):

diatomaceous earth	70
metal hydroxide sludges	30

D METALS

D. METALS		<input type="checkbox"/> TOTAL (PPM)	<input checked="" type="checkbox"/> EPA EXTRACTION PROCEDURE (mg/L)
ARSENIC (As)	N/A		SELENIUM (Se) N/A
BARIUM (Ba)	N/A		SILVER (Ag) 0.031 mg/L
CADMIUM (Cd)	N/A		COPPER (Cu) N/A
CHROMIUM (Cr)	2.2 mg/L		NICKEL (Ni)
MERCURY (Hg)	N/A		ZINC (Zn)
LEAD (Pb)	N/A		THALLIUM (Tl)
CHROMIUM-HEX (Cr + 6)		Interference Too High see Attached Analysis	

E OTHER COMPONENTS - TOTAL (PPM)

CYANIDES 3.6 PCB'S N/A
SULFIDES N/A PHENOLICS N/A

F SHIPPING INFORMATION

D.O.T. HAZARDOUS MATERIAL? ☒ YES ☐ NO

PROPER SHIPPING NAME: Hazardous Waste Solid NOS

HAZARD CLASS: ORM E I.D. NO.: NA 9189 R.O. 1

METHOD OF SHIPMENT: ☐ BULK LIQUID ☐ BULK SOLID

☒ DRUM (TYPE/SIZE): 55 gal.

ANTICIPATED VOLUME: _____ GALS. _____ CUBIC YARDS

OTHER: 30 Drums (555)

PER: ☐ ONE TIME ☐ WEEK ☐ MONTH

☐ QUARTER ☒ YEAR ☐

G HAZARDOUS CHARACTERISTICS

REACTIVITY: ☒ NONE ☐ PYROPHORIC ☐ SHOCK SENSITIVE
☐ EXPLOSIVE ☐ WATER REACTIVE ☐ OTHER _____

OTHER HAZARDOUS CHARACTERISTICS:
☒ NONE ☐ RADIOACTIVE ☐ ETIOLOGICAL
☐ PESTICIDE MANUFACTURING WASTE ☐ OTHER _____

USEPA HAZARDOUS WASTE? ☒ YES ☐ NO
USEPA HAZARDOUS CODE(S): FO004 _____

STATE HAZARDOUS WASTE? ☐ YES ☒ NO
STATE CODE(S): _____

H SPECIAL HANDLING INFORMATION

None.

[1] ADDITIONAL PAGE(S) ATTACHED

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

AUTHORIZED SIGNATURE

FILE

DATE _____

Thomas A. McBride

Frederick A. Auland

3/13/85



Waste Management, Inc.
GENERATOR'S WASTE MATERIAL PROFILE SHEET



WASTE PROFILE SHEET CODE

COL
TSDR

E55549

A GENERAL INFORMATION

AC-0184-0402

GENERATOR NAME: Square D Company TRANSPORTER: Metropolitan Environmental Inc.
FACILITY ADDRESS: 252 N. Tippecanoe TRANSPORTER PHONE: (419) 586-6638
Peru, IN. 46970 GENERATOR USEPA ID: IND0905446547
GENERATOR STATE ID: _____
TECHNICAL CONTACT: Mr. John Bull TITLE: EPA Coordinator PHONE: (317) 472-3381
NAME OF WASTE: Dry Spray Booth Filters
PROCESS GENERATING WASTE: SPRAY painting

B PHYSICAL CHARACTERISTICS OF WASTE

COLOR	ODOR <input type="checkbox"/> NONE <input checked="" type="checkbox"/> MILD <input type="checkbox"/> STRONG DESCRIBE _____	PHYSICAL STATE @ 70°F <input checked="" type="checkbox"/> SOLID <input type="checkbox"/> SEMI-SOLID <input type="checkbox"/> LIQUID <input type="checkbox"/> POWDER	LAYERS <input type="checkbox"/> MULTILAYERED <input type="checkbox"/> BI-LAYERED <input checked="" type="checkbox"/> SINGLE PHASED	FREE LIQUIDS <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO VOLUME _____ %
pH: <input type="checkbox"/> < 2 <input type="checkbox"/> 7.1-10 <input type="checkbox"/> N/A <input type="checkbox"/> 2-4 <input type="checkbox"/> 10.1-12.5 <input type="checkbox"/> 4.1-6.9 <input type="checkbox"/> > 12.5 <input checked="" type="checkbox"/> 7 <input type="checkbox"/> EXACT _____	SPECIFIC GRAVITY <input type="checkbox"/> < 8 <input type="checkbox"/> 1.3-1.4 <input type="checkbox"/> 8-10 <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 1.5-1.7 <input type="checkbox"/> 1.1-1.2 <input type="checkbox"/> > 1.7 <input type="checkbox"/> EXACT _____	FLASH POINT <input type="checkbox"/> < 70°F <input checked="" type="checkbox"/> > 200°F <input type="checkbox"/> 70°F - 100°F <input type="checkbox"/> NO FLASH <input type="checkbox"/> 101°F - 139°F <input type="checkbox"/> EXACT _____ <input type="checkbox"/> 140°F - 200°F	<input type="checkbox"/> CLOSED CUP <input type="checkbox"/> OPEN CUP	

C CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

dry, cured lacquer paint 60 %
fiberglass filters 40 %

D METALS

☐ TOTAL (PPM) ☒ EPA EXTRACTION PROCEDURE (mg/L)
ARSENIC (As) 0.040 SELENIUM (Se) ND
BARIUM (Ba) 1.0 SILVER (Ag) ND
CADMIUM (Cd) 0.06 COPPER (Cu) _____
CHROMIUM (Cr) 305.8 NICKEL (Ni) _____
MERCURY (Hg) 0.00074 ZINC (Zn) _____
LEAD (Pb) ND THALLIUM (Tl) _____
CHROMIUM-HEX (Cr + 6) _____ See Attached Analysis

E OTHER COMPONENTS - TOTAL (PPM)

CYANIDES N/A PCB'S N/A
SULFIDES N/A PHENOLICS N/A

F SHIPPING INFORMATION

D.O.T. HAZARDOUS MATERIAL? ☒ YES ☐ NO
PROPER SHIPPING NAME: Hazardous Waste Solid NOS
HAZARD CLASS: ORM E LD NO: NA98FL R.O.: _____
METHOD OF SHIPMENT: ☐ BULK LIQUID ☐ BULK SOLID
☒ DRUM (TYPE/SIZE) 55 gal.
ANTICIPATED VOLUME: _____ GALS. _____ CUBIC YARDS
OTHER 2
PER. ☐ ONE TIME ☐ WEEK ☐ MONTH
☐ QUARTER ☒ YEAR 1

G HAZARDOUS CHARACTERISTICS

REACTIVITY: ☒ NONE ☐ PYROPHORIC ☐ SHOCK SENSITIVE
☐ EXPLOSIVE ☐ WATER REACTIVE ☐ OTHER _____
OTHER HAZARDOUS CHARACTERISTICS:
☒ NONE ☐ RADIOACTIVE ☐ ETIOLOGICAL
☐ PESTICIDE MANUFACTURING WASTE ☐ OTHER _____
USEPA HAZARDOUS WASTE? ☒ YES ☐ NO
USEPA HAZARDOUS CODE(S): D007
STATE HAZARDOUS WASTE? ☐ YES ☒ NO
STATE CODE(S): _____

H SPECIAL HANDLING INFORMATION

None

!! ADDITIONAL PAGE(S) ATTACHED

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

AUTHORIZED SIGNATURE

TITLE

DATE

Norman A. Misko

Finishing Analyst

3/13/85

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. IND 005 446 547		Manifest Document No. 12-18		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Square D Company 252 N. Tippecanoe Peru, IN 46970						A. State Manifest Document Number							
4. Generator's Phone (317) 472-3381						B. State Generator's ID							
5. Transporter 1 Company Name Metropolitan Environmental, Inc.				6. US EPA ID Number INT 190 010 397		C. State Transporter's ID							
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone (419) 586-6638							
9. Designated Facility Name and Site Address SCA/Chemical Waste Management/ Adams Center Landfill, Inc. 4636 Adams Center Road Fort Wayne, IN 46806				10. US EPA ID Number IND 078 911 146		E. State Transporter's ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone (219) 447-5585							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <input checked="" type="checkbox"/> Hazardous Waste Solid, N.O.S. ORM-E NA 9189						30		DM		1,650		gal F006	
b. <input checked="" type="checkbox"/> Hazardous Waste Solid, N.O.S. ORM-E NA 9189						1		DM		55		gal D007	
c.													
d.													
J. Additional Descriptions for Materials Listed Above A. Wastewater Treatment Sludge from plating; #0184-901 B. Dry Paint Spray booth filters; #0184-902 Work Order No. W7186						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information None													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.													
Printed/Typed Name Norman A. McBride					Signature <i>Norman A. McBride</i>					Date Month Day Year 3/15/85			
17. Transporter 1 Acknowledgement of Receipt of Materials										Date			
Printed/Typed Name <i>Lanny King</i>					Signature <i>Lanny King</i>					Month Day Year 7/15/85			
18. Transporter 2 Acknowledgement of Receipt of Materials										Date			
Printed/Typed Name					Signature					Month Day Year			
19. Discrepancy Indication Space <i>none</i> <i>14860 # Need</i>													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.										Date			
Printed/Typed Name <i>Sandy H. W. M. C. H. E. N</i>					Signature <i>Sandy H. W. M. C. H. E. N</i>					Month Day Year 3/15/85			

ESTIMATED TOTAL	CHARGE ACCOUNT NO. 12-317-387	REQUISITIONED BY H. McPride	BUYER
DATE REC'D 4/10	REC'D BY [Signature]	CARRIER [Signature]	BILL OF LADING NO.
		FREIGHT CHARGES P.P.D. COLLECT	WEIGHT

PURCHASE ORDER

OUR ORDER NO.

12- 77752

SQUARE D COMPANY252 N. TIPPECANOE
PERU, IN 46970THIS NUMBER MUST
APPEAR ON ALL CONTAINERS,
PACKING LISTS, INVOICES, &
CORRESPONDENCE

TO: SCA/Chemical Waste Management
Adams Center Land Fill, Inc.
4636 Adams Center Road
Fort Wayne, IN 46806

TAXABLE <input type="checkbox"/>	TAX EXEMPT FOR RESALE <input type="checkbox"/>	TAX CERT. NO.
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MASTER VENDOR

DATE 5/13/85	SHIP TO ARRIVE 3/15/85	SHIP VIA Peru PPD	TERMS E/30	MARK CARTONS AND PACKING LIST
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RECEIVED	ITEM	QUANTITY	DESCRIPTION	OUR PART NO.	PRICE
	A	1	Disposal charge for 31 drums of Hazardous waste solids; 30 dr. of F006, 1 dr. of D007; Disposal to be per state approval letters.		
	B	1	Hazardous waste hauling charge		
			MANIFEST # 12-18		
			REF: AP 23866		

ITEM	DATE REC'D	QTY. REC'D	BAL. DUE	ITEM	DATE REC'D	QTY. REC'D	BAL. DUE	ITEM	DATE REC'D	QTY. REC'D	BAL. DUE

PURCHASING — FINAL RECEIPT

PE-1034 (5-72)

METROPOLITAN ENVIRONMENTAL, Inc.

METRO

P. O. BOX 511 - CELINA, OHIO 45822

Ph. 419-586-6638

3700 S. MEEKER - MUNCIE, INDIANA 47302

Ph. 317-289-5777

Date

Time Arrive Plant

Time Leave Plant

Time Arrive Disposal Site

Time Pull On Scales

Time Leave Disposal Site

"INDUSTRIAL AND SPECIAL WASTES SERVICES"

Customer

Container Size

Address

Material

H. W. Manifest #

Gross Weight

Disposal Site Taken To

Tare Weight

Disposal Site Ticket No.

Net Weight

Remarks: 31- Drums.

Customer

Driver