POWER EQUIPMENT DIVISION

Certified 808564

IB2

Square D Compound

IND 00544 (6647)

317-472-3381



252 NORTH TIPPECANOE

PERU, INDIANA 46970

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.

2. <u>Noted Violation:</u> 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. <u>Noted Violation:</u> 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: Haardous 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

D. Andrew Purviance

Manager, Manufacturing Services

DAP/cmp



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



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Finishing Analyst 3/13/85



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



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GENERATOR NAME: SHOAL D. COMPANY	TRANSPORTER VELETROPOLITAN ENVIONMENTAL IN
157 N. Timesone	TRANSPORTER WHEN OF ATTION F-NV ON MENTAL FO
FACILITY ADDRESS: 252 N. Tippecanoe.	
th real states	GENERATOR USEPA 10. INDA 015,414,615,417
TECHNICAL CONTACT: Mr. TODO Bull TITI	FDA CONMINITOR 217 U77 23PU
NAME OF WASTE: LOCK Spray Booth Filter	E: LETT WITH THONE: WITH THE SEX
PROCESS GENERATING WASTE: LSPEAY PRINTING	
B PHYSICAL CHARACTERISTICS OF WASTE	LAYERS
ODOR   NONE   MILD   PHYSICAL STA	TE @ 70"F MULTILAYERED FREE LIQUIDS
	SEMI-SOLID BILAYERED YES PNO
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pH: C 2 7.1-10 NIA SPECIFIC C 8 1.3-	1.4 FLASH CLOSED CUP
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1.1-12 D> 125	□ 101°F - 139°F □ EXACT
7 EXACT EXACT	140°F - 200°F.
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L	CADMIUM (Cd) COPPER (Cu)
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	UNIFORM HAZARDOUS IND 005 446 547  Manifest Document No. 2. Page 1 Information in is not required						the sha	ded a	areas					
	3. Generator's Name and Mailing Address Square D Company 252 N. Tippecanoe  A State Manifest Document Number													
			erator's Phone ( 317 )	Peru, IN 4 472-3381	6970		:		tate Gen					
Ш	1		sporter 1 Company Name		<b>6</b> . US E	PA ID Numb	er		tate Trar					
Ш		Metr	opolitan Environm	mental, Inc.		010 397		D. T	ransport	er's Pho	ne (4	19)58	6-6	638
Ш	<b> </b> ′ ·	Irans	sporter 2 Company Name		8. USE	PA ID Numb	er	E. S	late Tran	sporter	's ID 🔩			
Ш	-	Desid	gnated Facility Name and Sit	n Address	10 110 5				ansporte			و المراجع		
	3	SCA/ Mam	Chemical Waste Ma s Center Landfill Adams Center Roa	nagement/		PA ID Numb		5	tate Faci					
$\parallel$		ort	Wayne, IN 46806	10	IND 078	911 146	<u> </u>	(2:	19) 4					
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Ť	b.	х	Hazardous Waste	Solid NOS							801			<u>*                                    </u>
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	d.										·			
	В.	Dry	0184-901 Paint Spray boot Ork Order No. W71	th filters; #018 186	4-902									•
	15.	Spec	cial Handling Instructions and	d Additional Information		<u></u> :_	·		•	_				
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		trans	port by highway according to	o applicable international a	and national go	vernmental r	egulations.				ſ		ate	$\dashv$
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#### METROPOLITAN ENVIRONMENTAL, Inc.

### METRO

P. O. BOX 511 - CELINA, OHIO 45822 3700 S. MEEKER - MUNCIE, INDIANA 47302

Ph. 419-586-6638 Ph. 317-289-5777

Date	2015 63
	Arrive Plant
Time	Leave Plant
Time	Arrive Disposal Site
Time	Pull On Scales
Time	Leave Disposal Site

Customer	Container Size
Address	Material
H. W. Manifest # 42 / Disposal Site Taken To	Gross Weight
Disposal Site Taken To  Disposal Site Ticket No.	Tare Weight  Net Weight
Remarks: 31- Orums.	
Norman a M Cirlo	
Customer	Driver /