

**FILE**

STATE OF MICHIGAN
JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: <http://www.deq.state.mi.us>

RUSSELL J. HARDING, Director

REPLY TO:

CADILLAC DISTRICT OFFICE
120 CHAPIN ST W
CADILLAC MI 49601
FAX 616-775-1511

December 20, 1996

Gary Sayers
Electro-Plating Service, Inc.
959 E. 10 Mile
Madison Heights, Michigan 48071

Dear Mr. Sayers:

SUBJECT: MID042444687, Hazardous Waste Inspection--Fully Regulated Status

On November 4, 1996, staff of the Michigan Department of Environmental Quality (MDEQ) conducted an inspection of Electro-Plating Service, Inc., located at 959 E. 10 Mile, Madison Heights, Michigan, to evaluate compliance of that facility with the Part 111: Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, MCL 324.11101 et seq (Part 111); Subtitle C of the Federal Resource Conservation and Recovery Act (RCRA), as amended; Part 121: Liquid Industrial Wastes, of the Natural Resources and Environmental Protection Act, 1994 PA 451, MCL 324.12101 et seq (Part 121); and any regulations promulgated pursuant to these Acts. A copy of the completed inspection form can be obtained by contacting this office.

As a result of the inspection, staff of the MDEQ have determined that the above facility is in violation of the following:

1. Facility shall maintain a copy of the test results, waste analysis or other determinations for waste evaluation on-site for three years from the date that the waste was last sent off-site. (Rule 307(1): 40 CFR 262.40(c)) No analysis was available for the waste oil.
2. Restricted hazardous waste which exceeded established treatment standards or prohibitions shall have a notice accompanying each shipment of the waste off-site. (Rule 306(1)(d): 40 CFR 268.7(a)(1)) One shipment of TCE on May 17, 1996, MI297169 does not have a notice of land disposal restriction.
3. The notice must include: (Rule 306(1)(d): 40 CFR 268.7(a)(1)(i-v) or 268.7(a)(2)(i)(A-D) or 268.7(a)(3)(i-iv)) Whether the waste is wastewater or non-wastewater as defined in 268.2(d&f), and each waste code associated with the shipment. MI1527478, lacks this information.
4. A complete biennial report shall be submitted to the U.S. EPA by March 31. (Rule 308(1): 40 CFR 262.41) Please contact USEPA at (312) 886-7439 to obtain a report.
5. The date upon which each period of accumulation began must be marked and visible for inspection on each container. (Rule 306(1)(b): 40 CFR 262.34(a)(2)) While being accumulated on-site each container of hazardous waste must have the words "Hazardous Waste" marked or clearly labeled on it. (Rule 306(1)(c): 40 CFR 262.34(a)(3)) While being accumulated on-site each container of hazardous

waste must have the hazardous waste number marked or clearly labeled on it. (Rule 306(1)(b)) The three drums of TCE in storage were not appropriately labelled.

6. A facility may accumulate hazardous waste on-site for less than 90 days, from the date upon which the period of accumulation began, without having a permit or without having interim status. (Rule 306(1)) The last shipment of TCE was on May 17, 1994, and this implies storage of more than 90 days.
7. A container(s) holding hazardous waste must always be closed except when adding or removing waste. (Rule 306(1)(a): 40 CFR 265.173(a)) Containers of hazardous waste were stored open.
8. Weekly container and container area inspections for leaks and deterioration must be documented. (Rule 306(1)(a)(i)) I left a form which can be used to document these inspections.
9. Employee training documentation was unavailable Rule 306(1)(d): 40 CFR 265.16(d)(1)) I left a handout that may assist you in gaining compliance.
10. The contingency plan must contain the following information:
 - a) Actions personnel will take to respond to fires, explosions, or unplanned release of hazardous waste. (Rule 306(1)(e): 40 CFR 265.52(a&b))

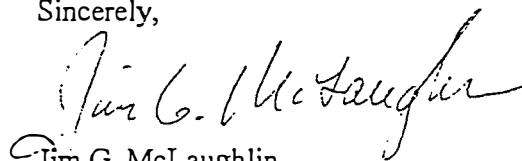
Electro-Plating Service, Inc., must respond to the violations noted in this letter. Please submit documentation to this office regarding those actions taken to address the violations by March 1, 1996. The MDEQ will evaluate the response and determine compliance status and notify you of this determination.

This Letter of Warning does not preclude nor limit the MDEQ's ability to initiate any other enforcement action, under state or federal law, as deemed appropriate.

Attached, for your information, is a handout explaining the Pollution Incident Prevention Plan required for certain facilities under Part 31; Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, MCL 324.3101. A short informational sheet on waste minimization; an information sheet on recycling fluorescent lamps; and information on PCB ballasts.

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

Sincerely,



Jim G. McLaughlin
Environmental Quality Analyst
Waste Management Division
616-775-3960 ext. 6201

Enclosures