Ohio EPA
40 years and moving forward
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 1, 2013

RE: NEWSOME & WORK METALLIZING
OHD 986 976 769
SUMMIT COUNTY
NOV

Roger Newsome
Newsome & Work Metallizing
P.O. Box 27091
Akron, OH 44319-7091

Dear Mr. Newsome:

This letter will update the status of the hazardous waste violations found at the Newsome & Work Metallizing (Newsome & Work) facility located at 258 Kenmore Boulevard in Akron, Ohio. It will also report on the sampling of containers completed by Ohio EPA on October 16 and October 26, 2012.

Based on previous inspections and the October 2012 sampling activities, the following additional violation was identified:

1. **Accumulation of hazardous waste beyond 180 days-Establishment of an Unpermitted Hazardous Waste Storage Facility**
Ohio Revised Code (ORC) 3734.02(E) and (F)
ORC 3734.02 (E) and (F) state that no person shall establish or operate a hazardous waste facility without a permit and that no person shall store, treat, or dispose of hazardous waste except at a facility with a hazardous waste permit.

   On October 16 and October 26, 2012, representatives of Ohio EPA obtained samples from multiple wastes located in containers at the facility. In general, Ohio EPA's inspections and analytical results documented the presence of the following types of characteristic and listed hazardous waste:

   - D001 – Ignitable,
   - D002 – Corrosive,
   - D007 – Chromium,
   - D018 – Benzene,
   - D035 – Methyl Ethyl Ketone (MEK),
   - F001/F003/F005 – MEK, Ethylbenzene, Xylene, Methyl Isobutyl Ketone, Methylene Chloride and Toluene.

Please find enclosed a summary of the analytical results, a map depicting the sample locations, and a partial inventory of the containers.

Ohio EPA has determined that Newsome and Work accumulated greater than 2,200 pounds of hazardous waste on-site at the facility resulting in a small quantity generator (SQG) of hazardous waste classification. As a SQG, Newsome & Work may accumulate hazardous waste on-site for up to 180 days provided that the facility complies with all requirements found in OAC rule 3745-52-34(D). The hazardous waste stored at the Newsome & Work facility has been on-site since at least August 14, 2012. As a result, Newsome & Work violated ORC 3734.02(E) and (F) by storing its hazardous waste at the facility for greater than 180 days.

Since Ohio EPA has not issued a permit to you to store hazardous waste, you have established a hazardous waste storage facility which has been operating without a permit in violation of ORC § 3734.02 (E) and (F). **You must make immediate arrangements for the lawful, off-site management of all hazardous waste. Prior to shipping the waste, you must confirm its proper disposition with me.** Submit documentation (i.e., manifests) verifying the lawful, off-site management of all hazardous waste at the facility.

Due to the unlawful establishment and operation of a hazardous waste facility, you are subject to conducting closure at the facility, pursuant to OAC rules 3745-55-10 through 3745-55-20. Closure is the cleanup procedure for all areas where hazardous waste has been managed. Generally, closure activities entail the following: removing and management of all waste and residues, removing or decontaminating contaminated equipment and structures, remediating contaminated soils and ground water if necessary, and managing all wastes generated from these activities in accordance with the hazardous waste laws. Furthermore, the closure process requires the submittal and approval of a closure plan which ensures that the closure performance standards set forth in OAC rule 3745-55-11 are met. The closure performance standards require removal and remediation of any contamination in these areas to prevent it from posing a risk to human health and the environment. The closure plan is normally prepared in accordance with Ohio EPA's Closure Plan Review Guidance for RCRA Facilities.

Since you have violated ORC § 3734.02(E)&(F), your Facility is subject to all applicable general facility standards found in OAC Chapters 3745-54 and 3745-55. Additionally, at any time Ohio EPA may assert its right to have you begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

The following is the status of the violations which were previously cited in Ohio EPA's October 3, 2012 letter:

2. Hazardous Waste Determination
OAC 3745-52-11 and OAC 3745-54-13
This rule requires that any person who generates a waste must determine if that waste is a hazardous waste.

a) Newsome & Work violated this rule by not determining whether the wastes on the enclosed inventory are hazardous waste. You told us on October 26, 2012 that you consider all the paint waste to be hazardous waste.
b) Newsome & Work has failed to evaluate the spent blast media generated at the facility. In addition, Newsome & Work has disposed of this spent blast media at the facility.

Newsome & Work must evaluate the spent blasting media to determine whether it is a hazardous waste. During the inspections, Ohio EPA observed the spent blasting media at the following areas:

1) On the ground in a disposal area located at the south end of your property. This area is designated as "MBWDA" on the attached figure.
2) On the ground within and around the building where blasting is done. This area is designated as "Building 5" on the attached figure.
3) On the ground and in piles located north of Building 5.
4) On the floor within a room that is used for blasting and metallizing. This area is designated as "Building 1" on the attached figure.

Newsome & Work must submit waste evaluation information for the spent blasting media, as well as a sampling and analysis plan (SAP) for the evaluation of all spent blasting media for the areas referenced above. You may contact me for guidance concerning developing the SAP.

At a minimum, the spent blasting media is considered a solid waste. In correspondence dated November 16, 2011, Summit County Public Health (SCPH) informed Newsome & Work that disposal of the spent blasting media to the ground is considered open dumping of solid waste, in violation of OAC rule 3745-27-05(C), ORC § 3734.03 and ORC § 3734.11(A). SCPH directed you to dispose of all spent blasting media, provided that it is not a hazardous waste, at a licensed solid waste facility.

During the October 26, 2012 inspection, Ohio EPA observed two 55-gallon containers within the spent blasting media disposal area designated as "MBWDA." In Ohio EPA's November 9, 2012 letter, you were informed that pursuant to OAC rule 3745-52-11, Newsome & Work must evaluate the waste contents of all containers found within this area. Submit a work plan that describes how all containers will be located, sampled, evaluated and managed.

c) Newsome & Work generated used oil contaminated media from cleanup of a used oil release. Please provide information regarding how you determined whether this waste was a hazardous waste and information on how it was disposed.
d) Newsome & Work generates spent fluorescent lamps. Newsome & Work must either evaluate these spent lamps pursuant to this rule or begin managing them as universal waste pursuant to OAC Chapter 3745-273.

I encourage you to work with one or more hazardous waste management company/consultant to make these determinations and to assist in the lawful, off-site management of these wastes. Please keep me advised as to your actions on this and when your contractor will be on-site to assess the containers and other wastes. I would like to be present during these activities.

3. **Response to Releases of Used Oil**
OAC 3745-279-22(D)
Previously corrected.

4. **Used Oil Storage Requirements for Generators (Labels)**
OAC 3745-279-22(C)
Previously corrected.

5. **Universal Waste Management Standards—Containers**
OAC 3745-273-13(D)
This violation cited in Ohio EPA's August 25, 2011 letter dealt with two waste fluorescent lamps that were not stored in a box or other container. Waste fluorescent lamps contain mercury and may be a hazardous waste. You must either determine whether your waste lamps are hazardous waste or manage them as universal wastes. If managed as universal waste, then they are required to be accumulated for recycling in a closed container and also be labeled as waste lamps. Submit waste evaluation information or provide documentation that the waste lamps are being managed in compliance with the universal waste requirements.

6. **Unlawful Treatment, Storage, Disposal, or Transportation of Hazardous Waste**
ORC 3734.02(E) and (F)
Ohio EPA's most recent inspections in October 2012 found no evidence that you are complying with this law regarding management of hazardous waste. You must immediately cease allowing waste solvents from evaporating/volatizing to the air. You must keep containers holding hazardous waste closed, except when adding or removing hazardous waste. As we suggested on August 14, 2012, you may want to use one of the empty drums we found in shed #1 to contain any newly generated hazardous waste. Please submit a written description of the corrective actions that were taken to address this violation.

Information Request/General Comments

1) You should clean up the used oil which has been released in the maintenance building. Failing to clean up the used oil may result in used oil being released to the environment (e.g., tracked outside. If this used oil is released to the environment you will be in violation of OAC rule 3745-279-22(D) and will be required to contain and clean up the used oil. This will also include properly evaluating the resulting waste pursuant to OAC rule 3745-52-11.
2) Please provide copies of any documentation you have concerning shipments of hazardous waste or used oil from this facility.
3) I suggest you have your used oil transported off-site to a used oil recycler since it has been on-site for over a year. A list of local used oil transporters has been provided to you.
4) Please provide information concerning your past and current use of MEK at your facility. Include information such as approximate monthly usage and how the waste MEK was managed and disposed.
5) I suggest you spray herbicide on and/or cut the poison ivy at the door of the shed.

You must immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, you are requested to provide documentation to me including the steps taken to abate the violations cited above. Such documentation may include written correspondence, updated policies, and photographs, as appropriate.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 (or 3714 for C&DD) of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to $10,000 per day for each violation. If circumstances delay the abatement of violations, you are requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.ohio.gov.

Sincerely,

Robert Almquist

Robert Almquist
Division of Materials and Waste Management

RA:cl
Enclosures

ec: Frank Popotnik, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO
Marlene Kinney, DMWM, NEDO
Frank Zingales, DMWM, NEDO
Dave Dysle, DMWM, NEDO
Jeff Mayhugh, DMWM, CO
Mitch Mathews, DMWM, CO
John Palmer, DERR, NEDO

cc: S. M. Lash, Akron Fire Department

Newsome and Work Metallizing							
258 Kenmore Blvd., Akron, OH							
Ohio EPA-DMWM Container Inventory (Approximate)							
Location		**1-gallon**	**2-gallon**	**5-gallon**	**20-gallon**	**30-gallon**	**55-gallon**
Building 2					2		2
Building 3 - Bay I		2		4		2	
Building 3 - Bay II		21		8			
Building 3 - Bay III		49	1	10			
Building 3 - Pallets		136	1	26			1
Building 4						1	
Shed #1		150		70		3	5
MWBDA				5			4
	Total Containers	358	2	123	2	6	12

Ohio Environmental Protection Agency
Division of Materials and Waste Management
Newsome & Work Metallizing
Waste Sampling Results

Constituent	Units	Sample ID	B3-15
		Sample Date	10/16/2012
		Matrix	Liquid
VOCs - Total			
Bromoform	mg/kg		<2800
Bromomethane	mg/kg		<5700
Chloroethane	mg/kg		<5700
cis-1,3-Dichloropropene	mg/kg		<2800
2-Butanone (MEK)	mg/kg		**29000**
Carbon disulfide	mg/kg		<2800
1,1,1-Trichloroethane	mg/kg		<2800
1,1,2-Trichloroethane	mg/kg		<2800
Vinyl chloride	mg/kg		<5700
Chloroform	mg/kg		<2800
Carbon tetrachloride	mg/kg		<2800
Chlorobenzene	mg/kg		<2800
1,2-Dichloropropane	mg/kg		<2800
cis-1,2-Dichloroethene	mg/kg		<2800
1,1-Dichloroethane	mg/kg		<2800
trans-1,3-Dichloropropene	mg/kg		<2800
Ethylbenzene	mg/kg		**41000**
1,2-Dichloroethane	mg/kg		<2800
1,1-Dichloroethene	mg/kg		<2800
Chloromethane	mg/kg		<5700
Xylenes, Total	mg/kg		**250000**
1,2-Dibromo-3-Chloropropane	mg/kg		<2800
4-Methyl-2-pentanone (MIBK)	mg/kg		**19000**
Styrene	mg/kg		<2800
Ethylene Dibromide	mg/kg		<2800
Dichlorodifluoromethane	mg/kg		<5700
Cyclohexane	mg/kg		<5700
Trichloroethene	mg/kg		<2800
1,1,2,2-Tetrachloroethane	mg/kg		<2800
Tetrachloroethene	mg/kg		<2800
2-Hexanone	mg/kg		<11000
Methylene Chloride	mg/kg		**4400**
Toluene	mg/kg		**45000**
Dichlorobromomethane	mg/kg		<2800
Benzene	mg/kg		<2800
Acetone	mg/kg		<11000
Chlorodibromomethane	mg/kg		<2800
1,1,2-Trichloro-1,2,2-trifluoroethane	mg/kg		<5700
1,2,4-Trichlorobenzene	mg/kg		<2800
1,3-Dichlorobenzene	mg/kg		<2800
Methylcyclohexane	mg/kg		**900**
1,4-Dichlorobenzene	mg/kg		<2800
Trichlorofluoromethane	mg/kg		<5700
trans-1,2-Dichloroethene	mg/kg		<2800
Isopropylbenzene	mg/kg		**850**
1,2-Dichlorobenzene	mg/kg		<2800
Methyl acetate	mg/kg		<5700
Methyl tert-butyl ether	mg/kg		<11000

Summary only, see full analytical report (240-16520).

Note:

Blue identifies F001 spent solvent as described in OAC rule 3745-51-31.

Purple identifies F003 spent solvent as described in OAC rule 3745-51-31.

Green identifies F005 spent solvent as described in OAC rule 3745-51-31.

Newsome & Work Metallizing, 10/26/12. Containers removed from the Main Blast Waste Disposal Area (MBWDA) and relocated outside of Building #3.										
OEPA #	CONTAINER				CONTENTS				OTHER	
	Type	Size	Color	Open	Amount	Color	Type	PID (PPM)	Label	Description
S1-16	Steel	5	Rust/White	N	3/4	Grey	Solid		Y	Faded
S1-17	Steel	5	Rust/White	N	Full	Black	Solid		Y	Faded
S1-18	Steel	5	White	N	Full		Liquid/Solid	>343	Y	Flammable Liquid. Contents: top 1/4 clear liquid, balance white solid.
S1-19	Steel	5	Black	N	1/2	Grey	Solid			
S1-20	Steel	5	White	N	Full		Liquid/Solid	>370	Y	DOT markings: Flammable Liquid 3.2
										Flash Point: Above 20°F But Below 73°F
										Shipping Name: Paint, Flammable Liquid UN 1263
										Contents: top 1/4 clear liquid, balance white solid.
S1-21	Steel	55	Rust/Brown	N	~4"	White	Liquid	5.7	N	Field pH 12.

Information recorded by Frank Zingales.

Newsome & Work Metallizing, Shed #1, 10/16/12

	CONTAINER				CONTENTS				OTHER	
OEPA #	Type	Size	Color	Open	Amount	Color	Type	PID (PPM)	Label	Description
S1-01	Steel	55-G	Rusted	Y	<1/4	Amber/Black	Liquid		N	
S1-02	Steel	55-G	Blue	N	3/4	Amber/Clear	Viscous Liquid	3600	Y	Flammable liquid, T01 Newsome + Work, Paint 8-28-81
S1-03	Steel	55-G	Green	N				1496	N	
S1-04	Steel	55-G	Black	N	1/3	Green/Amber	Green Solid/Amber Liquid	9999	N	
S1-05	Steel	55-G		Y	2/3	Green/Black	90% Solid, 10% Liquid	9999	N	
S1-06	Steel	30-G	Black	N	Full	Yellow/Orange	Liquid	794	N	
S1-07	Steel	30-G	Green	Y				11	N	
S1-08	Steel	5-G					Solid		Y	Flammable Liquid
S1-09	Poly	5-G	White	N	1/4	Clear	Liquid	378	N	
S1-10	Poly	1-G	White	N		Clear	Liquid	7000	N	
S1-11	Steel	1-G	Rusted	N	1/4	Clear	Liquid	9999	Y	Enamal Reducer DuPont 38123
S1-12	Steel	1-G							Y	Neils Chemical Paint, Flammable Liquid
S1-13	Steel	1-G	Rusted	N					Y	Neils Chemical Paint, Flammable Liquid, Activator B
S1-14	Poly	1-G	White	N		Clear	Liquid	3360	N	
S1-15	Poly	1-G	White	N		Clear	Liquid	4686	Y	wash primer catayst reducer, SherwinW., 530-7286
S1-16	Steel	5-G		N	3/4	Grey	Solid	3500		
S1-17	Steel	5-G		N	>3/4	Brown	Solid	1700		
S1-18	Steel	5-G		N	>3/4	Clear/White	Clear Liquid/White Solid	30		
S1-19	Steel	5-G		N	1/2	Grey	Solid	74		
S1-20	Steel	5-G		N	>3/4	Clear/White	Clear Liquid/White Solid	45	Y	Paint Flammable Liquid Flash Point >20 <73 F
S1-21	Steel	55-G	Rusted	N						

Newsome & Work Metallizing, 10/16/12. Building #3: Containers on Pallets and in Bays.										
OEPA #	CONTAINER				CONTENTS				OTHER	
	Type	Size	Color	Open	Amount	Color	Type	PID (PPM)	Label	Description
B3-01	Steel	5-G	Black	Y	3/4	Black	Liquid	2000+	Y	Flammable Liquid. Pallet #1
B3-02	Steel	5-G	White	Y	3/4	Black/Grey	Liquid	2000+	Y	Interlac 573, Flammable Liquid. Pallet #2
B3-03	Steel	5-G	Grey	Y			Misc containers inside.		Y	Duraplate 235. Pallet #2
B3-04	Steel	5-G	Grey	Y	1/2	Black/White	Jell	2000+	Y	Flammable Liquid. Pallet #2
B3-05	Steel	5-G	White	Y	1/2	Black	Liquid	2000+	Y	Flammable Liquid. Pallet #4.
B3-06	Steel	5-G	White	Y	1/2	Green/Black	Liquid	2000+	Y	Flammable Liquid. Pallet #4.
B3-07	Steel	5-G	White	N	3/4	Clear	Clear Liquid/Grey Sludge	2000+	Y	Flammable Liquid. Pallet #6
B3-08	Steel	5-G	Grey	N	Full	Green/Brown	Green Skim Layer/Liquid	200	Y	? Pallet #6
B3-09	Steel	5-G	White	N	Full	Black/Grey	Liquid	2000+	Y	Flammable Liquid. Pallet #7
B3-10	Steel	5-G	White	Y	4"	White	Sludge	2000+	Y	Flammable Liquid. Pallet #7
B3-11	Steel	5-G	Black	N	Full	Clear/Grey	Liquid/Sludge	2000+	Y	Flammable Liquid. Pallet #7
B3-12	Steel	5-G	Grey	Y	1/2	Black/White	Sludge	2000+	Y	? Pallet #8
B3-13	Steel	5-G	Grey	Y	1/4	Clear	Liquid	3	Y	Flammable Liquid. Pallet #8
B3-14	Plastic	5-G	White	Y	1/4	White	Liquid	10	Y	Flammable Liquid. Bay 3
B3-15	Steel	5-G	Grey	Y	3/4	Black	Liquid	1500	Y	Flammable Liquid. Bay 3
B3-16	Steel	5-G	Grey	Y	1/2	Brown	Sludge	2000+	Y	? Bay 3
B3-17	Steel	5-G	Grey	Y		Red	1-G can inside. Liquid	400	Y	? Bay 3
B3-18	Steel	5-G	Grey	Y	1/4	Black	Solid	5	Y	Flammable Liquid. Bay 2
B3-19	Steel	5-G	Grey	Y	1/2	Green	Liquid	2	Y	Pratt Lambert. Bay 2
B3-20	Steel	5-G	Grey	Y	1/4	Black	Liquid	600	Y	Flammable Liquid. Bay 2

Information recorded by Frank Popotnik.

NEWSOME & WORK METALLIZING
BUILDING LOCATIONS/SITE FEATURES

Ohio Environmental Protection Agency
Division of Materials and Waste Management
Newsome & Work Metallizing
Waste Sampling Results

Constituent	Units	Regulatory Level [1]	Sample ID	S1-02	S1-04 Solid	S1-04 Liquid	S1-05	S1-06	S1-09	S1-10	S1-11	S1-14	S1-15	S1-16	S1-17	S1-20	S1-21	B3-02	B3-04	B3-06	B3-07	B3-08	B3-09	B3-11	B3-12	B3-15	B3-16
			Sample Date	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/26/2012	10/26/2012	10/26/2012	10/26/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012	10/16/2012
			Matrix	Liquid	Solid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Solid	Solid	Liquid	Liquid	Liquid	Solid	Liquid	Liquid	Liquid	Liquid	Liquid	Solid	Liquid	Solid
			Location	Shed #1	Shed #1	Shed #1	Shed #1	Shed #1	Shed #1	Shed #1	Shed #1	Shed #1	Shed #1	MBWDA	MBWDA	MBWDA	MBWDA	Bldg #3	Bldg #3	Bldg #3	Bldg #3	Bldg #3	Bldg #3	Bldg #3	Bldg #3	Bldg #3	Bldg #3
Metals - TCLP																											
Arsenic	mg/l	5.0		0.0045	<0.50	<0.50	<0.50	<0.50	NA	NA	NA	NA	NA	0.0035	<0.50	0.0048	NA	<0.50	NA	<0.50	0.011	0.0038	NA	NA	<0.50	<0.50	0.006
Barium	mg/l	100		0.0054	0.047	0.18	1.0	0.14	NA	NA	NA	NA	NA	0.0067	0.14	0.0085	NA	0.16	NA	8.2	0.92	0.0085	NA	NA	1.2	0.04	0.77
Cadmium	mg/l	1.0		<0.10	0.0012	<0.10	<0.10	0.051	NA	NA	NA	NA	NA	<0.0050	<0.10	<.005	NA	<0.10	NA	<0.10	<.10	<0.10	NA	NA	<0.10	<0.10	0.003
Chromium	mg/l	5.0		0.0055	0.069	1.0	29	<0.50	NA	NA	NA	NA	NA	0.0027	<0.50	0.0032	NA	0.0098	NA	0.12	0.015	0.0041	NA	NA	0.054	0.32	0.12
Lead	mg/l	5.0		0.0057	0.076	0.27	3.3	<0.50	NA	NA	NA	NA	NA	0.013	0.04	0.039	NA	0.0051	NA	<0.50	0.011	<0.50	NA	NA	0.0057	0.027	0.0096
Selenium	mg/l	1.0		<0.25	<0.25	<0.50	<0.50	<0.50	NA	NA	NA	NA	NA	<0.013	<0.25	<0.013	NA	<1.0	NA	<0.28	<0.26	<0.50	NA	NA	<0.25	<0.25	<0.25
Silver	mg/l	5.0		<0.5	<0.50	<0.50	<0.50	0.2	NA	NA	NA	NA	NA	<0.025	<0.50	<0.025	NA	<2.0	NA	<0.50	<0.50	<0.50	NA	NA	<0.50	<0.50	<0.50
Mercury	mg/l	0.2		0.0019	0.00078	0.027	0.022	0.033	NA	NA	NA	NA	NA	0.00021	0.0012	<0.0020	NA	<0.0020	NA	0.0057	0.0033	<0.0020	NA	NA	<0.0020	0.00075	<0.0020
VOCs - TCLP																											
Carbon tetrachloride	mg/l	0.5		<10	<0.050	<50	<50	<50	NA	NA	NA	NA	NA	<0.050	<0.10	<0.050	NA	<0.10	<0.025	<0.60	<1.2	<0.10	NA	NA	<0.050	<0.24	<0.050
Chlorobenzene	mg/l	100		<10	<0.050	<50	<50	<50	NA	NA	NA	NA	NA	<0.050	<0.10	<0.050	NA	<0.10	<0.025	<0.60	<1.2	<0.10	NA	NA	<0.050	<0.24	<0.050
2-Butanone (MEK)	mg/l	200		3100 [2]	2800 [2]	92000 [2]	310 [2]	<500	NA	NA	NA	NA	NA	0.17 [2]	2.2 [2]	1.6 [2]	NA	69 [2]	230 [2]	1100 [2]	29000 [2]	57 [2]	NA	NA	2.6 [2]	1500 [2]	0.74 [2]
Benzene	mg/l	0.5		6.8	<0.050	<50	<50	15	NA	NA	NA	NA	NA	0.016	0.036	<0.050	NA	0.068	<0.025	<0.60	0.014	0.045	NA	NA	<0.050	<0.24	<0.050
Chloroform	mg/l	6.0		<10	<0.050	<50	<50	<50	NA	NA	NA	NA	NA	<0.050	<0.10	<0.050	NA	<0.10	<0.025	<0.60	<1.2	<0.10	NA	NA	<0.050	<0.24	<0.050
Vinyl chloride	mg/l	0.2		<10	<0.050	<50	<50	<50	NA	NA	NA	NA	NA	<0.050	<0.10	<0.050	NA	<0.10	<0.025	<0.60	<1.2	<0.10	NA	NA	<0.050	<0.24	<0.050
Tetrachloroethene	mg/l	0.7		<10	<0.050	<50	<50	<50	NA	NA	NA	NA	NA	<0.050	<0.10	<0.050	NA	<0.10	<0.025	<0.60	<1.2	<0.10	NA	NA	<0.050	<0.24	<0.050
Trichloroethene	mg/l	0.5		<10	<0.050	<50	<50	<50	NA	NA	NA	NA	NA	<0.050	<0.10	<0.050	NA	<0.10	<0.025	<0.60	<1.2	<0.10	NA	NA	<0.050	<0.24	<0.050
1,2-Dichloroethane	mg/l	0.5		<10	<0.050	<50	<50	<50	NA	NA	NA	NA	NA	<0.050	<0.10	<0.050	NA	<0.10	<0.025	<0.60	<1.2	<0.10	NA	NA	<0.050	<0.24	<0.050
Ignitability - Flashpoint	°F	<140		<72	NA	<72	75	72	NA	<72	<72	NA	NA	NA	NA	104	NA	<72	NA	<72	<72	77	<72	<72	NA	42	NA
Corrosivity - pH	SU	≤2 OR ≥12.5		NA	NA	NA	NA	NA	0.87	NA	NA	2.08	2.14	NA	NA	NA	11	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

NOTES:
Red indicates hazardous waste.
NA = Not Analyzed
Summary only, see full analytical reports (240-16520 & 240-16867).
Note 1:
Hazardous Waste Regulatory Level, OAC rule 3745-51-21 - A liquid is considered an ignitable hazardous waste when its flashpoint is less than 140 degrees Fahrenheit.
Hazardous Waste Regulatory Level, OAC rule 3745-51-22 - An aqueous liquid is considered a corrosive hazardous waste when its pH is ≤2 or ≥12.5.
Hazardous Waste Regulatory Level, OAC rule 3745-51-24 - A waste is considered a characteristic hazardous waste when tested using the toxicity characteristic leaching procedure (TCLP) and found to contain a contaminant at a concentration ≥ the respective level listed in this rule.
Note 2:
Under OAC rule 3745-51-31, Methyl Ethyl Ketone (MEK), a spent non-halogenated solvent meeting the listing description, would be considered a F005 hazardous waste.