

**COMPLIANCE HISTORY for
Ashland Distribution
P.O. Box 160367
Freeport Center Building 12
Clearfield, Utah 84016
UTD048406144**

ACTION: **NOTICE OF VIOLATION (No. 8503167)** issued April 10, 1985 based on inspection conducted Feb. 15, 1985 to determine compliance with the provisions of the hazardous waste storage permit issued by EPA Region VIII on August 18, 1984.

ISSUES

- Failure to include in the operating record a description of the physical form of waste (solid, liquid, sludge, gas etc.)
- Failure to list, in the operating record, the processes which generate characteristic hazardous waste
- Waste numbers and handling codes were not properly completed on manifests
- The inspection schedule did not reflect that inspections were being conducted for corrosion, leaks, and structural defects as required by the permit

RESOLUTION: not available

ACTION: **WARNING LETTER** sent November 19, 1987 by EPA Region VIII

ISSUES:

- Failure to update the Contingency Plan and training records
- Failure to attach a hazardous waste label to the storage tank

RESOLUTION: Not available

ACTION: **NOTICE OF VIOLATION (No. 8809600)** issued April 27, 1988

ISSUES:

- Failure to list all waste physical forms in the operating record
- Failure to record, in the operating record, the processes by which certain characteristic wastes were produced
- Failure to produce for review analytical data generated by waste analysis
- Failure to obtain proper pick-up documentation from customers prior to removing waste and to obtain acceptance documentation from the disposal facility confirming acceptance of the waste.
- Failure to analyze annually plant bulk generated hazardous waste
- Failure to maintain waste analysis records on-site

RESOLUTION: not available

ACTION: **NOTICE OF VIOLATION issued December 18, 1989 AND STIPULATION AND CONSENT ORDER** (No. 8912933) issued May 21, 1990, based on October 25, 1989 inspection

- ISSUES:**
- Failure to provide notice to generators that they are permitted to accept and store hazardous waste
 - Failure to provide the Romic TSDF with a Certificate of Representative Sample for wastes for pre-acceptance analysis
 - Failure to inspect containers from GM Heavy Truck on 9/19/89 for a match with the manifest
 - Failure to provide annual reviews of initial hazardous waste training..
 - Failure to have a device capable of summoning emergency help at the scene of operations in the case of an accident.
 - Failure to sign certain manifests to certify that the waste covered by those manifests were, in fact, the waste received.
 - Storage of a non-permitted waste (D007, D008) on the hazardous waste storage pad
 - Using containers, other than 55-gallon steel drums, on the storage pad
 - Stacking drums three high in the storage area.

RESOLUTION: A penalty of \$20,000 was paid for the violations.

ACTION: **NOTICE OF VIOLATION AND STIPULATION AND CONSENT ORDER** (No. 9508044) issued November 22, 1995.

- ISSUES:**
- Module I.D.10 of the permit by failing to provide proper notice to the Executive Secretary of additions to the permitted facility boundary and the additions to the approved secondary containment dike wall for the solvent recovery tank.
 - Module I.D.11 of the Permit by failing to submit to the Executive Secretary an engineering certification for the modified hazardous waste unit and for not providing the Executive Secretary an opportunity to inspect the modified unit prior to storing hazardous waste in the unit.
 - Module II.E.2. of the permit by failing to note in the inspection schedule log: the deterioration and cracks in the hazardous waste storage pad and the repair activity for the hazardous waste storage pad.
 - Module II.J.5. of the permit by failing to amend the Contingency Plan to update the facility map to reflect current facility boundaries and operations, to indicate new locations of emergency equipment and to show the new evacuation routes.
 - Attachment III-1 of the Permit by failing to utilize the container management practices for locating specific waste containers designated in the permit.
 - Attachment IV-3 of the Permit by failing to install a correct overfilling protection device for the solvent recovery tank.
 - Module IV.B. of the permit by storing the unpermitted wastes D018, D029, D035 and I129 in the solvent recovery tank.

- Module IV.C.4. and Attachment IV-1 of the Permit and UAC R315-8-10 of the Rules (formerly UAC R450-8-10) by failing to operate and maintain the secondary containment system for the collection tank/sump specifically, to remove accumulated precipitation from the secondary containment system within 24 hours.
- Module IV.D.4 of the permit and UAC R315-5-2 (formerly R450-5-1) by failing to analyze the contents of the solvent recovery tank shipped off-site in June of 1995. .
- Module IV.F.1 of the permit by failing to utilize the tank test device specified in the permit for the last assessment of the solvent recovery tank.
- Module IV.F.2. of the permit by failing to inspect the bottom of the collection tank/sump vault on a weekly basis as per Attachment II-3 of the Permit and inappropriate recording of results of collection tank/sump inspections in the inspection schedule (log).
- Module IV.F.3. and Attachment II-3 of the Permit and UAC R315-8-10 (formerly UAC R450-8-10) by failing to identify the broken tappe for the solvent recovery tank in the inspection schedule (log) and failure to inspect the liquid level in the tank on a daily basis.
- Failure to comply with UAC R315-3 (formerly UAC R450-3) by failing to apply for and receive proper permit modifications for the addition of a segregation dike wall to the tank secondary containment system, unpermitted waste in the solvent recovery tank and using a tank testint method not specified in the permit.

RESOLUTION: A penalty of \$34,530 was paid.

ACTION: **Warning Letter (No. 9712024)** was issued based on inspections on September 30, 1997, and October 10, 1997.

- ISSUES:
- The permitted hazardous waste storage capacity was exceeded.
 - One open container was observed in an area operated by First Recovery, a subsidiary of Ashland Oil.
 - Contingency Plan needs update.
 - Improper use of Elementary Neutralization Unit.
 - Security measures did not meet permit requirements.
 - Exceeded of 10-day transfer limit.

RESOLUTION: Satisfactory response was received from Ashland on January 20, 1998.

ACTION: **Warning Letter (No. 1206007)** was issued based on inspection on May 2, 2013.

ISSUES:

- The closure cost estimate was not submitted as required by the Permit and maintained in the operating record.
- Adequate funding was not maintained as required by the Permit for closure cost estimates.
- The certificate of hazardous waste liability insurance was not submitted as required and a copy was not maintained in the operating record.

RESOLUTION: Corrected all deficiencies by on June 25, 2013.

Last reviewed May 2013