

## White, John

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**From:** White, John  
**Sent:** Friday, December 20, 2013 8:48 AM  
**To:** 'mmaliska@aerc.com'  
**Cc:** 'Shohn Montano'; Parvez A. Mallick (mallick.parvez@epa.gov)  
**Subject:** RCRA Inspection  
**Attachments:** AERC Permit Checklist 2013.pdf; Weekly Inspection Log Form.pdf; 2014 LQG Training Agenda Notice.pdf

Mr. Maliska,

Here is the information I indicated I would provide:

- Weekly Inspection Log Form
- Permit Checklist – I can't ensure this is complete. I prepared this document myself to assist me with your permit conditions. Please ensure you follow your permit conditions.
- Notice for the January Biennial Report and LQG Training provided by DEP

Issues noted during the inspection were as follows:

- Contingency Plan must be updated in accordance with 40 CFR 264.54(d)/265.54(d)
- Proof of Notifications of local authorities in accordance with 40 CFR 264.37(a)/265.37(a) must be provided
- Black drum with green lid containing what appeared to be metal slag waste must be properly managed as either scrap metal or tested and disposed of properly
- Out of date emergency information posted throughout facility must be updated
- Satellite areas for acids and bases must be properly managed, including use of separate collection pails for each waste stream
- 90-day waste accumulation drums must be marked with an accumulation start date
- 90-day waste accumulation areas must be inspected weekly and a log maintained

During the inspection EPA requested copies of the following documents be provided to Bob Stewart at EPA Region 4:

- Financial assurance Letter of Credit
- Standby Trust Agreement
- AERC letter on company letterhead in which letter of credit is referenced
- Certificate of third party liability insurance
- Most recent closure plan and closure cost estimate

Thank you

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