

Mike Dewine, Governor Jon Husted, Lt. Governor Laurie A. Stevenson, Director

September 16, 2019

Roland Brothers All Coatings Co. Inc. 510 Ely Street Alliance, OH 44601

Re: All Coatings Co. Inc. Director's Final Findings and Orders (DFFO) DFFO RCRA C - Hazardous Waste Mahoning County OHD981094212 and OHR000205534

Subject: Final Findings and Orders of the Director

To Whom It May Concern:

Transmitted herewith are the Final Findings and Orders of the Director concerning the matter indicated for All Coatings Co. Inc.

Enclosed are the invoices for the total penalty amount of \$15,000.00 required by the orders. The penalty payment(s) shall be made by official check(s) made payable to "Treasurer, State of Ohio."

If you have any questions, please contact Sarah Miles at (614) 644-3037.

Sincerely,

Reux

Tonya Andrews, Administrative Professional 3 Division of Environmental Response & Revitalization

Enclosure

cc: Tammy Heffelfinger, DERR, CO Natalie Oryshkewych, DERR, NEDO Frank Zingales, DERR, NEDO Sarah Miles, Legal

### BEFORE THE OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

All Coatings Co. Inc. 1301 North Meridian Road Youngstown, OH 44509

Roland Brothers 1301 North Meridian Road Youngstown, Ohio 44509

Wanda Brothers 1301 North Meridian Road Youngstown, Ohio 44509

Budd Brothers 2525 Market Street Youngstown, Ohio 44509

Respondents

Director's Final Findings and Orders

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio "invironmental Protection Agency.

1 Date 9-16-19

#### PREAMBLE

It is agreed by the parties hereto as follows:

#### I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to All Coatings Co. Inc. (Respondent All Coatings), Roland Brothers (Respondent Roland Brothers), Wanda Brothers (Respondent Wanda Brothers) and Budd Brothers (Respondent Budd Brothers) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) §§ 3734.02(G), 3734.13 and 3745.01 and Ohio Administrative Code (OAC) rule 3745-50-31.

#### II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondents and heirs and successors in interest liable under Ohio law. No change in ownership of Respondent All Coatings or of the Facilities shall in any way alter Respondents' obligations under these Orders.

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#### III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3734. and the rules promulgated thereunder.

#### IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

- 1. Pursuant to ORC § 3734.02(G) and rule 3745-50-31 of the Ohio Administrative Code (OAC), the Director may, by order, exempt any person generating, storing, treating, or disposing of hazardous waste in such quantities or under such circumstances that, in the determination of the Director, it is unlikely that the public health or safety or the environment will be adversely affected thereby, from any requirement to obtain a permit or comply with other requirements of ORC Chapter 3734. Any such exemption shall be consistent with and equivalent to rules promulgated under the Resource Conservation and Recovery Act of 1976, 90 Stat. 2806, 42 U.S.C. § 6921 et seq., as amended.
- 2. Respondents All Coatings, Roland Brothers, Wanda Brothers and Budd Brothers are each a "person" as defined in ORC § 3734.01(G) and Ohio Administrative Code (OAC) rule 3745-50-10(A).
- 3. Respondents Roland Brothers and Wanda Brothers own real property located at 1301 North Meridian Road, Youngstown, Mahoning County, Ohio, 44509, parcel number 53-187-0-027.00-0 (Meridian Facility). The Meridian Facility has been assigned U.S. EPA identification number OHD981094212.
- 4. Respondent All Coatings is an active corporation that operates the Meridian Facility as a paint blending and manufacturing facility.
- Respondent Budd Brothers owns real property located at 2525 Market Street, Youngstown, Mahoning County, Ohio 44509, parcel number 53-053-0-496.00-0 (Market Facility). The Market Facility has been assigned U.S. EPA identification number OHR000205534.
- 6. In November 2016, Ohio EPA Special Investigations Unit responded to a complaint regarding abandoned paint waste and executed a search warrant at the Market Facility. Ohio EPA observed and documented approximately 216, 55-gallon drums of paint related wastes inside four semitruck trailers located in the parking lot area. The containers were in poor condition, rusting, bulging and

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some leaking contents inside the trailer. Also during this investigation, Ohio EPA found information that the paint related waste originated from the Meridian Facility. During the investigation, Ohio EPA collected 22 samples the containers for analysis. On December 7, 2016 Ohio EPA obtained the results from the analysis which indicated the paint related wastes exhibit the hazardous waste characteristic of ignitability (D001), as described in OAC rule 3745-51-21.

- 7. In March 2017, Ohio EPA's Special Investigations Unit referred the Market Facility to Ohio EPA's hazardous waste program for follow-up.
- 8. On August 10, 2017, Ohio EPA's hazardous waste program conducted a compliance evaluation inspection at the Market Facility. Ohio EPA documented the same four semitruck trailers in the parking lot area containing approximately 216, 55-gallon drums of ignitable hazardous waste paint and paint-related waste with the containers in the same state as described in Finding No. 6. of these Orders. During the inspection, Respondent All Coatings indicated the hazardous waste paint was acquired approximately 10 years ago from a paint manufacturer that was going out of business. Respondent All Coatings explained the acquired paint material was originally stored at the Meridian Facility with the intention to re-work the paint and then sell the paint. However, Respondent All Coatings described the difficulties encountered with finding customers for the paint and could not afford to properly transport the paint off-site for disposal. All Coatings "abandoned" this paint material by storing the paint material at the Meridian Facility in a manner inconsistent with the normal means of managing valuable products/ingredients, having no known market/disposition for the paint material, and disposing of the paint material by allowing the paint material to be released to the ground. Due to this abandonment at the Meridian Facility, the paint material is a "discarded material" and therefore a "waste" as defined in OAC Rule 3745-51-02. Furthermore, based the sampling of paint wastes, the paint waste was determined to be a "hazardous waste" as the term is defined by ORC § 3734.01(J) and OAC rules 3745-50-10(A) and 3745-51-03 due to ignitability (D001) and toxicity for methyl ethyl ketone (D035) as described in OAC rules 3745-51-21 and 3745-51-24, respectively. Furthermore, during the inspection, Respondent All Coatings explained that approximately 2 years prior to the inspection date Respondent All Coatings caused the transportation of the ignitable hazardous paint waste from the Meridian Facility to the Market Facility. Based upon this information Ohio EPA determined Respondent All Coatings caused the unlawful transportation of hazardous waste to the Market Facility, an unauthorized facility, and established and operated a hazardous waste facility without a hazardous waste installation and operation permit in violation ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A).

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- On August 10, 2017, Ohio EPA also conducted a compliance evaluation 9. inspection at the Meridian Facility. Ohio EPA observed and documented the presence of approximately 277, 55-gallon drums and numerous 1-gallon and 5gallon containers of paint-related waste being stored in four semitruck trailers and inside the building. Three of the trailers showed evidence of paint leakage inside and beneath the trailers due to the poor condition of the containers. Additionally, Ohio EPA observed staining on the ground/asphalt pad where the paint related waste had previously been stored and had been released. Respondent All Coatings explained that the containers formerly stored on the pad were moved to trailers which were eventually transported to the Market Facility. Based upon this information and the information regarding obtaining and management of the paint described in Finding No. 8. of these Orders, Ohio EPA determined, at a minimum Respondent All Coatings had not evaluated any of the paint wastes present at the Meridian Facility and is therefore in violation of OAC rule 3745-52-11. Furthermore, Respondent All Coatings requested to move the semitruck trailers from the Market Facility back to the Meridian Facility, but Ohio EPA explained it could not authorize that unlawful activity.
- 10. By Notice of Violation dated August 16, 2017, Ohio EPA notified Respondent All Coatings of the violations of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A) for storage at the Market Facility, and OAC rule 3745-52-11 for waste evaluation at the Meridian Facility referenced in Findings Nos. 8. and 9. of these Orders. In this Notice of Violation Ohio EPA recommended to Respondent All Coatings to evaluate the wastes and address leaking containers and releases to the ground.
- 11. Based upon the fact that Respondent All Coatings caused the transportation of hazardous waste to the Market Facility as described in Finding No. 8. of these Orders, the Director has determined that Respondent All Coatings violated ORC § 3734.02(F) by transporting hazardous waste to a facility not authorized to receive hazardous waste.
- 12. By letter dated August 28, 2017, Respondent All Coatings provided a response to Ohio EPA indicating an inventory of containers at the Meridian Facility would be created, and any identified leaking containers would be addressed. To date, no inventory has been received.
- 13. Due to the conditions at the Market and Meridian Facilities, by letter dated October 3, 2017, Ohio EPA requested U.S. EPA to conduct a removal action of the containers at the Meridian Facility and the Market Facility.
- 14. On November 2, 2017, Ohio EPA conducted a follow-up inspection and sampling

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> event at the Meridian Facility due to Respondent All Coatings' failure to evaluate the wastes as recommended in the Notice of Violation described in Finding No. 10. of these Orders. Ohio EPA observed containers in poor condition and releasing their contents to the ground were still present. During this visit, Respondent All Coatings again indicated it is unable to use the paint for the original purpose, is unable to sell it due to the market conditions since 2008 and does not have funds to dispose of it. Respondent All Coatings again mentioned a desire to transport the semitruck trailers from the Market Facility to the Meridian Facility and Ohio EPA explained they could only be moved by a licensed hazardous waste transporter, and to an authorized facility. Ohio EPA then collected nine samples of the paint related waste stored at the Meridian Facility.

- 15. On November 2, 2017, Ohio EPA conducted a follow-up inspection at the Market Facility. Ohio EPA observed that deteriorated containers had not been addressed and were still leaking their contents to the ground. Respondent All Coatings had still not evaluated the remaining containers of paint waste.
- 16. On November 17 and 30, 2017, Ohio EPA received the analytical results of the samples collected from the Meridian Facility as described in Finding No. 14. of these Orders. The results indicated the paint waste exhibits the hazardous waste characteristic of ignitability (D001) and toxicity for methyl ethyl ketone (D035), as described in OAC rule 3745-51-24.
- 17. As a result of the inspections referenced in Findings Nos. 14. and 15. of these Orders, and the analytical results of the samples collected from the wastes at the Meridian Facility as referenced in Finding No. 16. of these Orders, Ohio EPA determined that Respondent All Coatings, *inter alia*:
  - a. Failed to evaluate the remaining wastes at the Market Facility, in violation of OAC rule 3745-52-11; and
  - b. Established and operated a hazardous waste facility by storing hazardous paint waste at the Meridian Facility, in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A). The Meridian Facility does not have a permit for the storage of hazardous waste. The hazardous paint wastes were stored inside the building and inside four semitruck trailers in the parking lot area of the Meridian Facility, establishing these areas as unpermitted hazardous waste management units.
- 18. By letter dated December 5, 2017, Respondent All Coating was notified of the violations referenced in Finding No. 17. of these Orders.

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- 19. Based upon the information referenced in Findings Nos. 9., 14. and 16. of these Orders, the Director has determined that Respondent All Coatings disposed of hazardous paint waste to the ground at the Meridian Facility in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A), establishing and operating the Meridian Facility as a hazardous waste disposal facility. The areas where paint was disposed to the ground are considered unpermitted hazardous waste disposal units.
- 20. On December 6, 2017 Respondent All Coatings arranged for the unlawful transportation of two of the semitruck trailers (containing approximately 90, 55-gallon drums of ignitable (D001) hazardous waste) from the Market Facility to the Meridian Facility. The other two semitruck trailers of ignitable hazardous paint waste (approximately 126 containers) remained at the Market Facility.
- 21. By letter dated December 12, 2017, Respondent All Coatings provided safety data sheets of some of the wastes present at the Meridian Facility and identification of the contents of some containers at the Meridian Facility. This information was not sufficient to resolve the violation of OAC rule 3745-52-11 referenced in Finding No. 11. of these Orders.
- 22. On January 19, 2018, Ohio EPA received information regarding the unlawful transport of hazardous waste from the Market Facility to the Meridian Facility described in Finding No. 20. of these Orders.
- 23. On January 26, 2018, Ohio EPA conducted a follow-up inspection at the Meridian Facility. Ohio EPA confirmed the hazardous waste previously stored at the Market Facility had been unlawfully transported to the Meridian Facility where the hazardous waste is now being unlawfully stored. Additionally, Ohio EPA observed that hazardous paint waste was leaking out the trailers that were transported to the Meridian Facility. The previously observed leaking containers referenced in Finding No. 9. of these Orders were still present at this location.
- 24. On January 26, 2018, Ohio EPA also conducted a follow-up inspection at the Market Facility. Ohio EPA observed the remaining two semitruck trailers in the parking lot area containing ignitable hazardous waste paint and paint-related waste.
- 25. Based upon the information described in Findings Nos. 20. and 23. of these Orders, Ohio EPA determined that Respondent All Coatings, *inter alia:* 
  - a. Transported hazardous waste to a facility not authorized to receive hazardous waste, in violation of ORC § 3734.02(F). Respondent All

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Coatings arranged for the transport of hazardous paint waste from the Market Facility to the Meridian Facility. The Meridian Facility is not authorized to receive hazardous waste from off-site; and

- b. Established an unpermitted hazardous waste storage facility at the Meridian Facility, in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A). The Meridian Facility accepted and is storing the hazardous paint waste received from the Market Facility.
- 26. By Notice of Violation dated January 26, 2018, Respondent All Coatings was notified of the violations referenced in Finding No. 25. of these Orders. In this Notice of Violation Ohio EPA recommended to Respondent All Coatings to evaluate the wastes and address leaking containers and releases to the ground.
- 27. By letter dated February 12, 2018, Respondent All Coatings provided a response to the violations referenced in Finding No. 25. of these Orders.
- 28. On February 15, 2018, Ohio EPA conducted a follow up inspection at the Meridian Facility to observe the status of the leaking containers in poor condition. Ohio EPA documented a substantial release of ignitable (D001) hazardous paint waste from one of the trailers onto the ground.
- 29. Based upon the observations referenced in Finding No. 28. of these Orders, Ohio EPA determined that Respondent All Coatings unlawfully disposed of hazardous waste to the ground at the Meridian Facility, in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A). Respondent All Coatings responded to this release and removed the visibly contaminated soil and debris into a 55-gallon container.
- 30. By Notice of Violation dated February 21, 2018, Ohio EPA notified Respondent All Coatings of the violation referenced in Finding No. 29. of these Orders. In this Notice of Violation Ohio EPA recommended to Respondent All Coatings to evaluate the wastes and address leaking containers and releases to the ground.
- 31. Based upon the information described in Findings Nos. 5., 6. and 8. of these Orders, Respondent Budd Brothers owns a property where a hazardous waste storage facility was established and is being operated without a hazardous waste installation and operation permit in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A). Owners of hazardous waste storage facilities are required to have a hazardous waste installation and operation permit. Because neither Respondent Budd Brothers nor Respondent All Coatings have been issued an installation and operation permit for storage of

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hazardous waste at the Market Facility, The Director has determined Respondent Budd Brothers is in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A).

- 32. Based upon the information described in Findings Nos. 3., 9., 17.b., 25.b. and 29. of these Orders, Respondents Roland Brothers and Wanda Brothers own a property where a hazardous waste storage facility was established and is being operated without a hazardous waste installation and operation permit in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A). Owners of hazardous waste storage facilities are required to have a hazardous waste installation and operation permit. Because neither Respondents Roland Brothers, Wanda Brothers nor Respondent All Coatings have been issued an installation and operation permit for storage of hazardous waste at the Meridian Facility, the Director has determined Respondents Roland Brothers and Wanda Brothers are in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A).
- 33. On April 10, 2018, Ohio EPA issued Director's Final Findings and Orders (2018 Orders) to Respondents requiring removal of hazardous waste from the Market and Meridian Facilities, evaluation of remaining wastes at the Market and Meridian Facilities to determine if they are hazardous wastes, and the submittal and implementation of a hazardous waste closure plan to address any releases at the Market and Meridian Facilities.
- 34. On May 9, 2018, Respondents filed an appeal with the Environmental Review Appeals Commission (ERAC) regarding the 2018 Orders.
- 35. On September 7, 2018, Ohio EPA referred Respondents to the Ohio Attorney General's Office to enforce compliance with the 2018 Orders.
- 36. Based upon ERAC's direction, Respondents and the Ohio Attorney General's Office engaged in negotiations to address the violations and closure obligations outlined in the 2018 Orders at the Market Facility and Meridian Facility.
- 37. From May 2018 through May 2019, Respondents conducted activities to address the 2018 Orders, including but not limited to, proper characterization and management of hazardous wastes at the Market and Meridian Facilities, reblending and repackaging of paints for sale to consumers, submittal of documentation of paint sales and hazardous waste disposal.
- 38. The Director has determined that Respondents activities as described in Finding No. 37. of these Orders has resolved the violations referenced in Findings Nos.

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9. and 17.a of these Orders.

- 39. On June 4, 2019, Respondents submitted draft closure plans for the Market and Meridian Facilities.
- 40. Upon the effective date of these Orders, the Director's Final Findings and Orders issued on April 10, 2018, as referenced in Finding No. 33. of these Orders are terminated.
- 41. The Director has determined that no further action is required by Respondents All Coatings, Roland Brothers, Wanda Brothers and Budd Brothers with regard to the violations referenced in Findings Nos. 11. and 25.a. of these Orders.
- 42. Due to Respondents' establishment and operation of hazardous waste storage and disposal facilities as described in Findings Nos. 9., 17.b., 25.b. and 29. of these Orders, Respondents are required to have a hazardous waste facility installation and operation permit at both the Meridian and Market Facilities and are subject to all general facility standards found in OAC Chapter 3745-54 and 55, including but not limited to, closure in accordance with OAC rules 3745-55-11 through 3745-55-20, the financial assurance for closure requirements contained in OAC rules 3745-55-42 through 3745-55-51 and corrective action for waste management units in accordance with OAC rule 3745-54-101. To obtain a hazardous waste facility installation and operation permit, Respondents are required to submit "Parts A and B" of the application in accordance with OAC Chapter 3745-50.
- 43. The submittal of a Closure Plan which complies with the administrative requirements of OAC Chapters 3745-65 and 66 and the substantive requirements of OAC Chapters 3745-54 and 55 including, but not limited to, the groundwater protection program in accordance with OAC rules 3745-54-90 through 3745-54-100 in lieu of the submittal of an application for a hazardous waste facility installation and operation permit is unlikely to adversely affect the public health or safety or environment. Therefore, the Director finds that the issuance to Respondents of an exemption from the requirement to submit an application for a hazardous waste facility is unlikely to adversely affect the public health or safety or environment. Therefore, the Director finds that the issuance to Respondents of an exemption from the requirement to submit an application for a hazardous waste facility installation and operation permit for the Facility is unlikely to adversely affect the public health or safety or the environment within the meaning of ORC § 3734.02(G).

#### V. ORDERS

Respondent shall achieve compliance with Chapter 3734. of the ORC and the

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regulations promulgated thereunder according to the following compliance schedule:

- 1. All Respondents are hereby exempted from the requirement to submit an application for a hazardous waste facility installation and operation permit for the Market and Meridian Facilities, provided that, within 60 days after the effective date of these Orders, All Respondents comply with the following:
  - a. All Respondents shall submit to Ohio EPA for review and approval a Closure Plan for the hazardous waste management units at the Meridian Facility and the Market Facility where hazardous waste was managed as described in Findings Nos. 9. and 17.b., 25.b. and 29. of these Orders. A copy of the Closure Plan shall be submitted in accordance with Section VIII. of these Orders and an additional copy submitted to Ohio EPA, Division of Environmental Response and Revitalization, Manager, Engineering Section, P.O. Box 1049, Columbus, Ohio 43216-1049;
  - b. This Closure Plan shall comply with the administrative requirements of OAC Chapters 3745-65 and 3745-66 and the substantive requirements of OAC Chapters 3745-54 and 3745-55, including but not limited to, the groundwater protection program in accordance with OAC rules 3745-54-90 through 54-100.
  - c. The Closure Plan is subject to approval by Ohio EPA. If Ohio EPA does not approve the Closure Plan and provides All Respondents with a written statement of deficiencies, All Respondents shall submit a revised Closure Plan for approval addressing the deficiencies within 30 days of receiving such written statement. If Ohio EPA modifies the Closure Plan, the modified Closure Plan becomes the approved plan. Upon Ohio EPA's written approval of the Closure Plan, All Respondents shall implement the approved Closure Plan in the manner and pursuant to the time frames set forth in the approved Closure Plan and OAC rules 3745-55-13/3745-66-13;
  - d. Within 180 days after approval of the Closure Plan pursuant to Order No. 3.c., All Respondents shall submit a closure cost estimate and documentation demonstrating that All Respondents have established financial assurance and liability coverage for the areas of the Facilities subject to closure, in accordance with OAC rules 3745-55-42 through 3745-55-47; and
  - e. Within 60 days after completion of closure, All Respondents shall submit

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> certification of closure to Ohio EPA in accordance with OAC rule 3745-55-15. Ohio EPA's acceptance of the closure certification shall resolve the violations referenced in Findings Nos. 9., 17.b., 25.b. and 29. of these Orders.

- 2. By September 30, 2019, Respondents shall have sold or properly disposed of all remaining repackaged paint referenced in Finding No. 36. of these Orders. Documentation demonstrating compliance shall be submitted to Ohio EPA for review no later than October 15, 2019.
- 3. Respondent shall pay Ohio EPA the amount of \$15,000.00 in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 3734. and will be deposited into the hazardous waste cleanup fund established pursuant to ORC § 3734.281 pursuant to the following schedule:
  - a. On or by November 1, 2019, Respondent shall pay to Ohio EPA the amount of \$1,250.00;
  - b. On or by December 1, 2019, Respondent shall pay to Ohio EPA the amount of \$1,250.00;
  - c. On or by January 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00;
  - d. On or by February 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00;
  - e. On or by March 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00;
  - f. On or by April 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00;
  - g. On or by May 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00;
  - h. On or by June 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00;
  - i. On or by July 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00;

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- j. On or by August 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00;
- I. On or by September 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00; and
- m. On or by October 1, 2020, Respondent shall pay to Ohio EPA the amount of \$1,250.00.

Payments shall be made by an official check made payable to "Treasurer, State of Ohio." The official checks shall be submitted to Ohio EPA, Office of Fiscal Administration, Department L-2711, Columbus, Ohio 43260-2711, together with a letter identifying the Respondent. A copy of the checks shall be sent to the Financial Program Manager, Ohio EPA, Division of Environmental Response and Revitalization, P.O. Box 1049, Columbus, Ohio 43216-1049.

#### VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Environmental Response and Revitalization acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is a [e.g., corporate officer] who is in charge of a principal business function of Respondent.

#### VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, the operation of Respondent's Facility.

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#### VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

#### IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

#### X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio Environmental Protection Agency Northeast District Office Division of Environmental Response and Revitalization 2110 East Aurora Road Twinsburg, Ohio 44087 Attn: Hazardous Waste Program Manager

and Ohio EPA Central Office at the following address:

For mailings, use the post office box number:

Manager, Hazardous Waste Compliance Assurance Section Ohio Environmental Protection Agency Lazarus Government Center Division of Environmental Response and Revitalization P.O. Box 1049 Columbus, Ohio 43216-1049

For deliveries to the building:

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> Manager, Hazardous Waste Compliance Assurance Section Ohio Environmental Protection Agency Lazarus Government Center Division of Environmental Response and Revitalization 50 West Town Street Columbus, Ohio 43215

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

#### XI. RESERVATION OF RIGHTS

Ohio EPA reserves its rights to exercise its lawful authority to require Respondent to perform corrective action at the Facility, at some time in the future, pursuant to ORC Chapter 3734. or any other applicable law. Respondent reserves its rights to raise any administrative, legal or equitable claim or defense with respect to performing such corrective action. Ohio EPA and Respondent each reserve all other rights, privileges and causes of action, except as specifically waived in Section XII. of these Orders.

#### XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Except for the right to seek corrective action at the Facility by Respondent, which right Ohio EPA does not waive, compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

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#### XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

#### XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

#### IT IS SO ORDERED AND AGREED:

**Ohio Environmental Protection Agency** 

Laurie A. Stevenson Director

IT IS SO AGREED:

All Coatings Co. Inc.

Wanda Brothers

Signature

8-19 2019

Date

<u>CNANDA</u> BROTHERS Printed or Typed Name

Sec. Theasuren Title

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**Roland Brothers** 

Brothero Signature

2-19-19 Date

Printed or Typed Name

QUINCE 1301 N MERIDIA Rd Title

Wanda Brothers

Wanda Brothers Signature

2019 Date

<u>Wanda</u> Brothers Printed or Typed Name

Co-OWNER 1301 N MCRIDIAN Rd. Title

**Budd Brothers** 

Dubo Brothery Signature

Budd Brothers Printed or Typed Name

OWNER 2525 MARKet St. Title

8-19-19 Date

Date Printed: Septemb	per 17, 2019	Revenue ID:	1306448
Place ID:	531041	Please incluc all correspon	le this Revenue ID with dence.
Information:	All Coatings Co Inc	Due Date:	November 01, 2019
6	1301 N Meridian Rd Youngstown, OH 44509-	Amount Due:	\$1,250.00
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardous w	vaste cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardous V	Vaste Program, All Coating	s Co. Inc., et. al.

## For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advic	e	Detach H	lere - Please R	eturn This Po	rtion With	Your Paymen
Place ID:	531041					
Information:	All Coatings	Co Inc				
	1301 N Meri	dian Rd			Due Date:	Nov 01, 2019
	Youngstown	, OH 44509-		A	mount Due:	\$1,250.00
Secondary Type/Id:	RCRA / O	HD981094212				
Revenue Type:	FFOHW			Amoun	t Enclosed:	\$
https://eBiz.epa.ohio "Pay Ohio EPA Fees	Online".					
	Online". number on	your check.	Revenue ID:	1306448		
"Pay Ohio EPA Fees Please write this Make check or me	Online". number on oney order Ohio Enviro Departmen	your check. payable to "T onmental Prot t L-2711	Revenue ID: Treasurer, State rection Agency -	1306448 e of Ohio"		
'Pay Ohio EPA Fees Please write this Make check or ma <u>Remit to:</u>	Online". number on oney order Ohio Enviro Departmen Columbus,	your check. payable to "T onmental Prot	Revenue ID: Treasurer, State rection Agency -	1306448 of Ohio" OFA		
"Pay Ohio EPA Fees Please write this Make check or ma <u>Remit to:</u>	Online". number on oney order Ohio Enviro Departmen Columbus,	your check. payable to "T onmental Prot t L-2711	Revenue ID: Treasurer, State rection Agency -	1306448 e of Ohio"		
Pay Ohio EPA Fees Please write this Make check or ma <u>Remit to:</u>	Online". number on oney order Ohio Enviro Departmen Columbus,	your check. payable to "T onmental Prot t L-2711	Revenue ID: Treasurer, State tection Agency - 11	1306448 of Ohio" OFA Check ID:		
"Pay Ohio EPA Fees Please write this Make check or me	Online". number on oney order Ohio Enviro Departmen Columbus,	your check. payable to "T onmental Prot t L-2711	Revenue ID: Treasurer, State rection Agency - 11	1306448 e of Ohio" OFA Check ID: Check Date:		

Date Printed: Septemb	per 17, 2019	Revenue ID:	1306449
		Please includ all correspon	le this Revenue ID with dence.
Place ID:	531041		
Information:	All Coatings Co Inc	Due Date:	December 01, 2019
	1301 N Meridian Rd Youngstown, OH 44509-	Amount Due:	\$1,250.00
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardous waste clear	nup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardous Waste Prog	gram, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advic	e	Detach Here -	Please Return This Po	rtion With	Your Payment
Place ID:	531041				
Information:	All Coatings C	o Inc			
	1301 N Meridi	an Rd		Due Date:	Dec 01, 2019
	Youngstown,	OH 44509-	Ar	mount Due:	\$1,250.00
Secondary Type/Id:	RCRA / OH	D981094212			
Revenue Type:	FFOHW		Amount	Enclosed:	\$
	oney order p	ayable to "Treas	urer, State of Ohio"		
Remit to:	Department	nmental Protection L-2711 DH 43260-2711	n Agency - OFA		
For Ohio EPA use on		45200-2711	Check ID:		
			Check Date:		
			Check Number:		
			Check Amount:	\$	
			125000	FFOHW	1306449

Date Printed: September 17, 2019

Place ID.

Revenue ID: 1306450

Please include this Revenue ID with all correspondence.

riace ib.	531041	
Information:	All Coatings Co Inc	
	1301 N Meridian Rd	
	Youngstown, OH 44509-	

521011

Due Date: January 01, 2020 Amount Due: \$1,250.00

Effective Date: September 18, 2019

Revenue Description:DHWM- Findings and Orders - hazardous waste cleanupProgram Name:RCRA C - Hazardous WasteReason:Fund 541 (3734.281) RCRA C-Hazardous Waste Program, All Coatings Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advid	e	Detach H	ere - Please Return This Por	rtion With Your Payment
Place ID:	531041			
Information:	All Coatings Co	o Inc		
	1301 N Meridia	an Rd		Due Date: Jan 01, 2020
	Youngstown, (	OH 44509-	An	mount Due: \$1,250.00
Secondary Type/Id:	RCRA / OHE	0981094212		
Revenue Type:	FFOHW		Amount	t Enclosed: \$
		mental Proto 2711	reasurer, State of Ohio" ection Agency - OFA	
For Ohio EPA use on		11 43200-27		
			Check ID: Check Date:	
			Check Number:	
			Check Amount:	\$
			Check Amount: 125000	

Date Printed: Septemi	per 17, 2019	Revenue ID:	1306451
		Please includ all correspon	de this Revenue ID with Idence.
Place ID:	531041		
Information:	All Coatings Co Inc	Due Date:	February 01, 2020
15	1301 N Meridian Rd Youngstown, OH 44509-	Amount Due:	\$1,250.00
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardous wa	ste cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardous Wa	aste Program, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advi	e	Detach Her	e - Please Ret	urn This Po	rtion With	Your Payment
Place ID:	531041					
Information:	All Coatings	Co Inc				
	1301 N Meri	dian Rd			Due Date:	Feb 01, 2020
	Youngstown	, OH 44509-		A	mount Due:	\$1,250.00
Secondary Type/Id:	RCRA / O	HD981094212				
Revenue Type:	FFOHW			Amoun	t Enclosed:	\$
Many Ohio EPA fee i https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this Make check or m	<u>.gov</u> , login or Online". <b>number on</b>	create an account your check.	t and from the "A Revenue ID:	vailable Servio		v choose
https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this Make check or m	<u>.gov</u> , login or Online". number on oney order Ohio Enviro Departmen	create an account your check. payable to "Tre onmental Protec t L-2711	t and from the "A Revenue ID: easurer, State o tion Agency - O	vailable Servio 1306451 of Ohio''		v choose
https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	<u>.gov</u> , login or Online". number on oney order Ohio Enviro Departmen Columbus,	create an account your check. payable to "Tre onmental Protec	t and from the "A Revenue ID: easurer, State o tion Agency - O	vailable Servio 1306451 of Ohio'' FA	ces" windov	
https://eBiz.epa.ohio 'Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	<u>.gov</u> , login or Online". number on oney order Ohio Enviro Departmen Columbus,	create an account your check. payable to "Tre onmental Protec t L-2711	t and from the "A Revenue ID: easurer, State o tion Agency - O	vailable Servio 1306451 of Ohio'' FA Check ID:	ces" windov	
https://eBiz.epa.ohio 'Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	<u>.gov</u> , login or Online". number on oney order Ohio Enviro Departmen Columbus,	create an account your check. payable to "Tre onmental Protec t L-2711	t and from the "A Revenue ID: easurer, State o tion Agency - O	vailable Servio 1306451 of Ohio'' FA	ces" windov	
https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this Make check or m	<u>.gov</u> , login or Online". number on oney order Ohio Enviro Departmen Columbus,	create an account your check. payable to "Tre onmental Protec t L-2711	t and from the "A Revenue ID: asurer, State o tion Agency - O Cł	vailable Servio 1306451 of Ohio" FA Check ID: Check Date:	ces" windov	

Date Printed: Septemi	per 17, 2019	Revenue ID:	1306452
Place ID:	531041	Please includ all correspon	de this Revenue ID with adence.
Information:	All Coatings Co Inc	Due Date:	March 01, 2020
	1301 N Meridian Rd Youngstown, OH 44509-	Amount Due:	\$1,250.00
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardous	waste cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardous	Waste Program, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

	ce Detach Here - P	lease Return This Por	tion With Your Payment
Place ID:	531041		
Information:	All Coatings Co Inc		
	1301 N Meridian Rd		Due Date: Mar 01, 2020
	Youngstown, OH 44509-	An	nount Due: \$1,250.00
Secondary Type/Id:	RCRA / OHD981094212		
Revenue Type:	FFOHW	Amount	Enclosed: \$
Please write this	number on your check. Reve	nue ID: 1306452	
Make check or m	onev order pavable to "Treasur		
	oney order payable to "Treasur Ohio Environmental Protection / Department L-2711 Columbus, OH 43260-2711	er, State of Ohio"	
<u>Remit to:</u>	Ohio Environmental Protection A Department L-2711 Columbus, OH 43260-2711	er, State of Ohio" Agency - OFA	
<u>Remit to:</u>	Ohio Environmental Protection A Department L-2711 Columbus, OH 43260-2711	er, State of Ohio" Agency - OFA Check ID:	
<u>Remit to:</u>	Ohio Environmental Protection A Department L-2711 Columbus, OH 43260-2711	er, State of Ohio" Agency - OFA Check ID:	
	Ohio Environmental Protection A Department L-2711 Columbus, OH 43260-2711	er, State of Ohio" Agency - OFA Check ID: Check Date:	

Date Printed: Septemi	per 17, 2019	Revenue ID:	1306453
		Please includ all correspon	de this Revenue ID with Idence.
Place ID:	531041		
Information:	All Coatings Co Inc	Due Date:	April 01, 2020
	1301 N Meridian Rd	Amount Due:	\$1,250.00
	Youngstown, OH 44509-		
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardou	s waste cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardou	s Waste Program, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advic	e	Detach Here	- Please Return This Po	rtion With	Your Payment
Place ID:	531041				
Information:	All Coatings	Co Inc			
	1301 N Meric	dian Rd		Due Date: A	Apr 01, 2020
	Youngstown,	OH 44509-	A	mount Due: \$	\$1,250.00
Secondary Type/Id:	RCRA / OF	HD981094212			
Revenue Type:	FFOHW		Amoun	t Enclosed: \$	5
https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this	Online". number on y	your check. Re	evenue ID: 1306453	Ces window	00056
"Pay Ohio EPA Fees Please write this Make check or m	Online". number on y oney order p	your check. Re bayable to "Treas onmental Protectio	evenue ID: 1306453 surer, State of Ohio"		00056
"Pay Ohio EPA Fees Please write this Make check or m	Online". number on y oney order p Ohio Enviro Department	your check. Re bayable to "Treas onmental Protectio	evenue ID: 1306453 surer, State of Ohio"		
"Pay Ohio EPA Fees Please write this Make check or m	Online". number on y oney order p Ohio Enviro Department Columbus,	your check. Re bayable to "Treas onmental Protection L-2711	evenue ID: 1306453 surer, State of Ohio"		
"Pay Ohio EPA Fees Please write this Make check or m <u>Remit to:</u>	Online". number on y oney order p Ohio Enviro Department Columbus,	your check. Re bayable to "Treas onmental Protection L-2711	evenue ID: 1306453 surer, State of Ohio" on Agency - OFA		
"Pay Ohio EPA Fees Please write this Make check or m <u>Remit to:</u>	Online". number on y oney order p Ohio Enviro Department Columbus,	your check. Re bayable to "Treas onmental Protection L-2711	evenue ID: 1306453 surer, State of Ohio" on Agency - OFA Check ID:		
"Pay Ohio EPA Fees Please write this Make check or m <u>Remit to:</u>	Online". number on y oney order p Ohio Enviro Department Columbus,	your check. Re bayable to "Treas onmental Protection L-2711	evenue ID: 1306453 surer, State of Ohio" on Agency - OFA Check ID: Check Date:		

Date Printed: Septemb	ber 17, 2019	Revenue ID:	1306454
		Please includ all correspor	de this Revenue ID with Idence.
Place ID:	531041		
Information:	All Coatings Co Inc	Due Date:	May 01, 2020
4	1301 N Meridian Rd Youngstown, OH 44509-	Amount Due:	\$1,250.00
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardou	s waste cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardou	s Waste Program, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advid	e	Detach He	ere - Please Return This Por	tion With	Your Payment
Place ID:	531041				
Information:	All Coatings	Co Inc			
	1301 N Meric	dian Rd		Due Date:	May 01, 2020
	Youngstown,	OH 44509-	An	nount Due:	\$1,250.00
Secondary Type/Id:	RCRA / OI	HD981094212			
Revenue Type:	FFOHW		Amount	Enclosed:	\$
	oney order j	payable to "Tr	reasurer, State of Ohio" ection Agency - OFA		
	Department				
For Ohio EPA use on	y		Check ID:	2	
			Check Date:		
			Check Number:		
			Check Amount:	\$	
			125000	FFOHW	1306454

Date Printed: Septemb	per 17, 2019	Revenue ID:	1306455
		Please incluc all correspon	le this Revenue ID with dence.
Place ID:	531041		
Information:	All Coatings Co Inc	Due Date:	June 01, 2020
	1301 N Meridian Rd	Amount Due:	\$1,250.00
	Youngstown, OH 44509-	Anount Buo.	¢1,200.00
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardous	waste cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardous	Waste Program, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advi	e	Detach Here	- Please Return Th	is Portion With	Your Payment
Place ID:	531041				
Information:	All Coating	s Co Inc			
	1301 N Me	ridian Rd		Due Date:	Jun 01, 2020
	Youngstow	n, OH 44509-		Amount Due:	\$1,250.00
Secondary Type/Id:	RCRA /	OHD981094212			
Revenue Type:	FFOHW		A	mount Enclosed:	\$
<u>https://eBiz.epa.ohic</u> "Pay Ohio EPA Fees <b>Please write this</b>	<u>.gov</u> , login o Online". number or	n your check. R		55	w choose
https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this Make check or m	<u>.gov</u> , login o Online". number or oney orde Ohio Envi Departme	n your check. R r payable to "Trea ronmental Protect nt L-2711	evenue ID: 13064 surer, State of Ohio	55	w choose
https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this Make check or m	<u>.gov</u> , login o Online". number or oney orde Ohio Envi Departme	n your check. R r payable to "Trea ronmental Protect	evenue ID: 13064 surer, State of Ohio	55	w choose
https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	<u>.gov</u> , login o Online". number or oney order Ohio Envi Departme Columbus	n your check. R r payable to "Trea ronmental Protect nt L-2711	evenue ID: 13064 Isurer, State of Ohio ion Agency - OFA	55	w choose
https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	<u>.gov</u> , login o Online". number or oney order Ohio Envi Departme Columbus	n your check. R r payable to "Trea ronmental Protect nt L-2711	evenue ID: 13064 Isurer, State of Ohio ion Agency - OFA	55 5" ck ID:	w choose
https://eBiz.epa.ohio "Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	<u>.gov</u> , login o Online". number or oney order Ohio Envi Departme Columbus	n your check. R r payable to "Trea ronmental Protect nt L-2711	Revenue ID: 13064 Isurer, State of Ohio ion Agency - OFA Che Check Check Nu	55 o" ck ID: Date: mber:	w choose
"Pay Ohio EPA Fees Please write this Make check or m	<u>.gov</u> , login o Online". number or oney order Ohio Envi Departme Columbus	n your check. R r payable to "Trea ronmental Protect nt L-2711	evenue ID: 13064 Isurer, State of Ohio Ion Agency - OFA Check Check	55 o" ck ID: Date: mber:	w choose

Date Printed: Septemb	per 17, 2019	Revenue ID:	1306456
		Please incluc all correspon	de this Revenue ID with Idence.
Place ID:	531041		
Information:	All Coatings Co Inc	Due Date:	July 01, 2020
	1301 N Meridian Rd	Amount Due:	\$1,250.00
	Youngstown, OH 44509-		
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardous waste	e cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardous Wast	e Program, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advic	e Detach Here -	Please Return This Portic	on With Your Payment
Place ID:	531041		
Information:	All Coatings Co Inc		
	1301 N Meridian Rd	Du	ue Date: Jul 01, 2020
	Youngstown, OH 44509-	Amou	Int Due: \$1,250.00
Secondary Type/Id:	RCRA / OHD981094212		
Revenue Type:	FFOHW	Amount En	closed: \$
"Pay Ohio EPA Fees Please write this	number on your check. Rev	venue ID: 1306456	' window choose
"Pay Ohio EPA Fees Please write this Make check or m	Online". number on your check. Rev oney order payable to "Treasu Ohio Environmental Protectior	venue ID: 1306456 urer, State of Ohio"	' window choose
"Pay Ohio EPA Fees Please write this Make check or m	Online". number on your check. Rev oney order payable to "Treasu	venue ID: 1306456 urer, State of Ohio"	' window choose
"Pay Ohio EPA Fees Please write this Make check or m	Online". <b>number on your check.</b> Revenues on the second s	venue ID: 1306456 urer, State of Ohio" h Agency - OFA	' window choose
"Pay Ohio EPA Fees Please write this Make check or mo <u>Remit to:</u>	Online". <b>number on your check.</b> Revenues on the second s	venue ID: 1306456 urer, State of Ohio" h Agency - OFA Check ID:	
"Pay Ohio EPA Fees Please write this Make check or mo <u>Remit to:</u>	Online". <b>number on your check.</b> Revenues on the second s	venue ID: 1306456 urer, State of Ohio" h Agency - OFA Check ID: Check Date:	
"Pay Ohio EPA Fees Please write this Make check or mo <u>Remit to:</u>	Online". <b>number on your check.</b> Revenues on the second s	venue ID: 1306456 urer, State of Ohio" h Agency - OFA Check ID: Check Date:	

Date Printed: Septemb	per 17, 2019	Revenue ID:	1306457
		Please includ all correspon	le this Revenue ID with dence.
Place ID:	531041		
Information:	All Coatings Co Inc	Due Date:	August 01, 2020
	1301 N Meridian Rd Youngstown, OH 44509-	Amount Due:	\$1,250.00
	, cange and a second	Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardous w	vaste cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardous V	Vaste Program, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advic	e Deta	ch Here - Please Return This Portion W	/ith Your Payment
Place ID:	531041		
Information:	All Coatings Co Inc		
	1301 N Meridian Rd	Due Da	ate: Aug 01, 2020
	Youngstown, OH 445	09- Amount D	ue: \$1,250.00
Secondary Type/Id:	RCRA / OHD981094	4212	
Revenue Type:	FFOHW	Amount Enclos	ed: \$
		eck. Revenue ID: 1306457 to "Treasurer, State of Ohio"	
		I Protection Agency - OFA	
For Ohio EPA use on	У	Check ID:	
		Check Date:	
		Check Number:	
		Check Amount: \$	
		125000 FFC	DHW 1306457

Date Printed: Septemb	per 17, 2019	Revenue ID:	1306458
		Please includ all correspon	le this Revenue ID with dence.
Place ID:	531041		
Information:	All Coatings Co Inc	Due Date:	September 01, 2020
	1301 N Meridian Rd Youngstown, OH 44509-	Amount Due:	\$1,250.00
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardous	waste cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardous	Waste Program, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advic	e Detach Here -	Please Return This Portion With	Your Payment
Place ID:	531041		
Information:	All Coatings Co Inc		
	1301 N Meridian Rd	Due Date:	Sep 01, 2020
	Youngstown, OH 44509-	Amount Due:	\$1,250.00
Secondary Type/Id:	RCRA / OHD981094212		
Revenue Type:	FFOHW	Amount Enclosed:	\$
Make check or m	number on your check. Rev oney order payable to "Treas	urer, State of Ohio"	
<u>Remit to:</u>	Ohio Environmental Protection Department L-2711 Columbus, OH 43260-2711	n Agency - OFA	
For Ohio EPA use on	ly	Check ID:	
		Check Date:	
		Check Number:	
		Check Amount: \$	
		125000 FFOHV	V 1306458

Date Printed: Septemb	per 17, 2019	Revenue ID:	1306459
		Please includ all correspon	le this Revenue ID with dence.
Place ID:	531041		
Information:	All Coatings Co Inc	Due Date:	October 01, 2020
	1301 N Meridian Rd Youngstown, OH 44509-	Amount Due:	\$1,250.00
		Effective Date:	September 18, 2019
Revenue Description:	DHWM- Findings and Orders - hazardous v	waste cleanup	
Program Name:	RCRA C - Hazardous Waste		
Reason:	Fund 541 (3734.281) RCRA C-Hazardous	Waste Program, All Coating	s Co. Inc., et al.

For some Revenues, Interest and/or Penalties may be charged for late payment. Next Interest Date (if applicable):

Remittance Advic	e	Detach He	ere - Please Retu	irn This Po	rtion With	Your Paymer
Place ID:	531041					
Information:	All Coatings C	o Inc				
	1301 N Meridi	an Rd			Due Date:	Oct 01, 2020
	Youngstown,	OH 44509-		Ar	mount Due:	\$1,250.00
Secondary Type/Id:	RCRA / OH	D981094212				
Revenue Type:	FFOHW			Amount	Enclosed:	\$
"Pay Ohio EPA Fees Please write this	Online". <mark>number on y</mark>	our check.	Revenue ID:	1306459		
<u>https://eBiz.epa.ohio</u> "Pay Ohio EPA Fees Please write this Make check or m <u>Remit to:</u>	Online". number on y oney order p Ohio Enviror Department	our check. ayable to "T nmental Prote L-2711	Revenue ID: reasurer, State o ection Agency - O	1306459 of Ohio''		
"Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	Online". number on y oney order p Ohio Enviror Department Columbus, C	our check. ayable to "T nmental Prote	Revenue ID: reasurer, State o ection Agency - O	1306459 of Ohio''		
"Pay Ohio EPA Fees Please write this Make check or m	Online". number on y oney order p Ohio Enviror Department Columbus, C	our check. ayable to "T nmental Prote L-2711	Revenue ID: reasurer, State o ection Agency - O	1306459 of Ohio'' FA		
"Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	Online". number on y oney order p Ohio Enviror Department Columbus, C	our check. ayable to "T nmental Prote L-2711	Revenue ID: reasurer, State c ection Agency - O 1	1306459 of Ohio" FA Check ID: Check Date:		
"Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	Online". number on y oney order p Ohio Enviror Department Columbus, C	our check. ayable to "T nmental Prote L-2711	Revenue ID: reasurer, State c ection Agency - O 1 Ch	1306459 of Ohio" FA Check ID: Check Date: eck Number:		
"Pay Ohio EPA Fees Please write this Make check or m <u>Remit to</u>	Online". number on y oney order p Ohio Enviror Department Columbus, C	our check. ayable to "T nmental Prote L-2711	Revenue ID: reasurer, State c ection Agency - O 1 Ch	1306459 of Ohio" FA Check ID: Check Date:		