



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

April 9, 2018

A&L Metal Processing
 1920 George Street
 Sandusky, OH 44870

**Re: A&L Metal Processing
 Director's Final Findings and Orders
 (DFFO)
 DFFO
 RCRA C - Hazardous Waste
 Erie County
 OHD987023876**

Subject: Final Findings and Orders of the Director

Dear Sir:

Transmitted herewith are the Final Findings and Orders of the Director concerning the matter indicated for A&L Metal Processing.

Enclosed is the invoice for the total penalty amount of \$13,200.00 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,

A handwritten signature in black ink that reads "Tonya Andrews". The signature is written in a cursive, flowing style.

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

Enclosure

cc: Tammy Heffelfinger, DERR, CO
 Mitch Mathews, DERR, CO
 Allie Reynolds, DERR, NWDO
 Colleen Weaver, DERR, NWDO
 Sarah Miles, Legal

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

Strategic Quality Consulting, Inc. dba
A&L Metal Processing
1920 George Street
Sandusky, OH 44870

Director's Final
Findings and Orders

Respondent

PREAMBLE

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

It is agreed by the parties hereto as follows:

By:  Date: 4-9-18

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to Strategic Quality Consulting, Inc. dba A&L Metal Processing (Respondent) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) §§ 3734.13 and 3745.01.

II. PARTIES BOUND

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

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. Respondent is a "person" as defined in ORC § 3734.01(G) and Ohio Administrative Code (OAC) rule 3745-50-10(A).
2. Respondent operates a zinc plating, chemical conversion coating and phosphate coating facility located at 1920 George Street, Sandusky, Erie County, Ohio 44870 (Facility).
3. At the Facility, Respondent generates "hazardous waste" as that term is defined by ORC § 3734.01(J) and OAC rules 3745-50-10(A) and 3745-51-03. Respondent routinely generates hazardous waste in quantities classifying it as a large quantity generator of hazardous waste (greater than 1000 kilograms per month) and has been assigned EPA ID number OHD987023876. The hazardous wastes generated by Respondent at the Facility include, but are not limited to, filter press cake (D007 – chromium, F006 – toxicity) and wastewater from electroplating processes and tank clean outs (D002 – corrosivity, D004 – arsenic), as described in OAC rules 3745-51-24 (toxicity), 3745-51-31 (hazardous waste from non-specific sources) and 3745-51-22 (corrosivity), respectively.
4. On September 8, 2016, Ohio EPA received an anonymous complaint alleging that Respondent was dumping filter press cake out the back door onto the ground.
5. On October 3, 2016, Ohio EPA conducted a complaint investigation and compliance evaluation inspection at the Facility. Ohio EPA observed that the filter press cake is stored in the compressor room in a 15-yard roll-off. Due to the lack of information provided by Respondent during the inspection, Ohio EPA was unable to determine Respondent's hazardous waste generator status, and consequently, which hazardous waste requirements were applicable to Respondent at the time of the inspection. While no dumping of filter press cake was observed during the inspection, Ohio EPA identified five wastes that had not been evaluated to determine if they were hazardous waste, with no records of any analyses being performed within the past three years. The wastes include the filter press cake from the on-site waste water treatment plant, the waste water collected in two 2,500-gallon tanks, waste observed in three 55-gallon drums outside the back door of the building, waste observed in an open one

cubic-yard tote outside of the building, and wastes observed in multiple one cubic-yard totes in the compressor room.

6. As a result of the inspection referenced in Finding No. 5. of these Orders, Ohio EPA determined that Respondent, *inter alia*:
 - a. failed to evaluate wastes generated at the Facility to determine if they are hazardous, in violation of OAC rule 3745-52-11; and
 - b. failed to keep records of any waste determinations on site for a minimum of three years, in violation of OAC rule 3745-52-40(C).
7. By letter dated October 12, 2016, Respondent was notified of the violations referenced in Finding No. 6. of these Orders.
8. On October 20, 2016, Ohio EPA received a packet of documentation from Respondent including MSD sheets, a flow diagram for the plating processes, types of chemicals used at the Facility, rejected manifests, a waste sampling plan and waste profiles.
9. On October 17, and October 24, 2016, Respondent collected samples of the mixed wastes in a 2,500-gallon tank, an inside tote, the outside tote, three 55-gallon drums located outside, the zinc filter cake and the filter press cake.
10. By electronic mail dated November 5, 2016, Respondent provided a copy of a hazardous waste manifest for a rejected load of wastewater dated February 13, 2015. The wastewater was shipped on a hazardous waste manifest, but identified as a non-hazardous waste. The wastewater had been rejected due to corrosivity (D002) and chromium (D007).
11. By electronic mail dated November 8, 2016, Respondent submitted analytical results of the samples collected of the wastes referenced in Finding No. 9. of these Orders. These results indicated that two of the sampled wastes, some liquid inside a tote found outside the building on a concrete pad, and the filter press cake are characteristically hazardous for chromium (D007). Based upon this information, Ohio EPA determined Respondent is a large quantity generator of hazardous waste and is subject to the large quantity generator requirements.
12. By electronic mail dated November 15, 2016, Ohio EPA requested Respondent to submit personnel training documentation and the Respondent's contingency plan for the Facility required by a large quantity generator of hazardous waste.

13. By electronic mail dated November 21 and 30, 2016, Respondent provided documentation relating to personnel training and Respondent's contingency plan in response to Ohio EPA's request referenced in Finding No. 12. of these Orders.
14. Based upon a review of the information provided by Respondent as referenced in Findings Nos. 8., 10., 11. and 13. of these Orders, Ohio EPA determined that Respondent, *inter alia*:
 - a. Caused hazardous waste filter cake to be transported to a facility not authorized to receive hazardous waste, in violation of ORC § 3734.02(F). Specifically, Respondent transported its hazardous waste filter cake to a municipal solid waste landfill for the past several years;
 - b. Failed to properly complete a hazardous waste manifest for the shipments of hazardous waste filter cake, in violation of OAC rule 3745-52-20(A)(1);
 - c. Failed to complete and retain a copy of a land disposal restriction form for the hazardous waste filter cake at the Facility, in violation of OAC rule 3745-270-07;
 - d. Failed to label the container holding hazardous waste filter cake with the words "hazardous waste" and an accumulation start date, in violation of OAC rule 3745-52-34(A)(2) and (3);
 - e. Failed to keep the container of hazardous waste filter cake closed except when adding or removing waste, in violation of OAC rule 3745-66-73(A);
 - f. Failed to have the home address for a designated emergency coordinator in the contingency plan, in violation of OAC rule 3745-65-52(D); and
 - g. Failed to identify the location of emergency equipment at the Facility in the contingency plan, in violation of OAC rule 3745-65-52(E).
15. By letter dated December 6, 2016, Ohio EPA notified Respondent of the violations referenced in Finding No. 14. of these Orders. This letter also notified Respondent that the violations cited in Ohio EPA's letter dated October 12, 2016, as referenced in Findings Nos. 6. and 7. of these Orders are resolved.
16. By electronic mail dated December 21 and 22, 2016, Respondent provided responses to the violations cited in Ohio EPA's December 6, 2016 letter as referenced in Finding No. 15. of these Orders. Respondent provided a waste profile and past analysis results for the filter cake, photos, a revised contingency

plan and statements to address other violations.

17. By electronic mail dated January 6, 2017, Respondent provided personnel training documents and pictures of the covered and labeled roll-off containing the hazardous waste filter cake and the tote containing chromium hazardous waste.
18. By electronic mail dated January 11 and 12, 2017, Respondent provided process information regarding the generation of the filter cake. The process information describes that Respondent plates onto cast iron parts as well as carbon steel. Wastewater treatment sludges generated from zinc plating onto carbon steel are excluded from the hazardous waste F006 listing description in OAC rule 3745-51-31, but zinc plating onto cast iron is not. Therefore, due to the commingling in the wastewater treatment process of the wastewater from the plating of zinc onto cast iron with the wastewater from zinc plating onto carbon steel, the resulting filter cake generated by Respondent meets the hazardous waste F006 listing as described in OAC rule 3745-51-31. Additionally, Respondent submitted documentation demonstrating the treatment and discharge to the wastewater treatment system of the chromium waste from the tote outside the building on the concrete pad.
19. Based upon a review of the information provided by Respondent, Ohio EPA determined that Respondent *inter alia*:
 - a. Unlawfully stored hazardous waste for greater than 90 days without a hazardous waste facility installation and operation permit, in violation of ORC § 3734.02(E) and (F). Specifically, Respondent stored the hazardous waste filter cake for greater than 90 days. The hazardous waste filter cake was present during the October 3, 2016 inspection and was not shipped off-site as of the January 12, 2017 electronic mail communication referenced in Finding No. 18. of these Orders. Because of this, the area where the hazardous waste filter cake roll-off is stored is now a hazardous waste management unit;
 - b. Unlawfully stored hazardous waste for greater than 90 days without a hazardous waste facility installation and operation permit, in violation of ORC § 3734.02(E) and (F). Specifically, Respondent indicated to Ohio EPA that it stored the hazardous chromium waste in the tote outside the building on a concrete pad as referenced in Finding No. 11. of these Orders since early spring of 2016, for greater than 90 days. Because of this, the concrete pad outside the building where the chromium waste tote was stored is now a hazardous waste management unit; and

- c. Failed to train employees on hazardous waste management procedures and contingency plan implementation, in violation of OAC rule 3745-65-16(A)(2).
20. By letter dated February 14, 2017, Respondent was notified of the violations referenced in Finding No. 19. of the Orders. This letter also notified Respondent that the violations referenced in Findings Nos. 14.d., 14.e., 14.f., 14.g. and 19.c. of these Orders were resolved.
21. By electronic mail dated February 28, 2017, Respondent submitted a hazardous waste manifest showing the hazardous waste filter cake was sent off-site for lawful disposal and a land disposal restriction notice for the hazardous waste filter cake.
22. By letter dated March 31, 2017, Ohio EPA notified Respondent that the violations referenced in Findings Nos. 14.b. and 14.c. of these Orders were resolved.
23. Ohio EPA conducted a follow-up inspection at the Facility on May 17, 2017. During the inspection, it was clarified that the previous sampling of waste in the tanks was *mixed* wastes, and that the individual waste streams had not been evaluated at the point of generation, prior to mixing, as required. As a result of this, Ohio EPA determined that Respondent, *inter alia*, failed to determine if the baths being pumped into the two 2,500-gallon tanks are hazardous, in violation of OAC rule 3745-52-11. These baths include all Sealer Baths (bath 1 on both the large and small Zinc Lines and bath 2 on the Phosphate Line), the Hexavalent Yellow Chromate Bath (bath 5 on the large Zinc Line), all Soak Cleaner Baths (baths 8 and 9 on the large Zinc Line and baths 7 and 8 on the small Zinc Line, and baths 3 and 4 on the Phosphate Line), the Oil Bath (bath 1 on the Phosphate Line), and the Phosphate Bath (bath 9 of the Phosphate Line).
24. By letter dated June 12, 2017, Respondent was notified of the violation referenced in Finding No. 23. of these Orders.
25. By electronic mail dated August 10, 2017, Respondent submittal analytical results for samples collected from the Soak Cleaner Baths (baths 8 and 9 on the large Zinc Line and baths 7 and 8 on the small Zinc Line, and baths 3 and 4 on the Phosphate Line), and the Phosphate Bath (bath 9 of the Phosphate Line). All samples display the hazardous characteristic for corrosivity (D002), and the sample collected from baths 8 and 9 on the large Zinc Line and baths 7 and 8 on the small Zinc Line also displays the hazardous characteristic for arsenic (D004) as described in OAC rules 3745-51-22 and 3745-51-24, respectively.

26. Based upon a review of the sample analysis results described in Finding No. 25. of these Orders, Ohio EPA has determined that at least some of the waste baths from the small Zinc Line, the large Zinc line and the Phosphate line that are pumped into the 2,500-gallon tanks are hazardous waste, however, Respondent is not operating the 2,500-gallon tanks in compliance with the hazardous waste tank standards. Therefore, Ohio EPA has determined that Respondent, *inter alia*:
 - a. Failed to obtain and keep at the Facility, a hazardous waste tank certification and assessment for each 2,500-gallon tank, in violation of OAC rule 3745-66-92(A) and (G);
 - b. Failed to have secondary containment and detection of release systems in place for each 2,500-gallon tank, in violation of OAC rule 3745-66-93(B) and (C);
 - c. Failed to have secondary containment for the ancillary equipment for the two hazardous waste tanks, in violation of OAC rule 3745-66-93(F);
 - d. Failed to conduct and document daily inspections of the hazardous waste tank system, in violation of OAC rule 3745-66-95; and
 - e. Mixed incompatible hazardous wastes in the two 2,500-gallon tanks, in violation of OAC rule 3745-66-99.
27. By letter dated August 30, 2017, Ohio EPA notified Respondent of the violations referenced in Finding No. 26. of these Orders.
28. By electronic mail dated September 28, 2017, Respondent notified Ohio EPA that it will no longer mix the hazardous wastes generated on the Zinc Lines and the Phosphate Line in the tanks, as it had been doing previously.
29. By letter dated November 21, 2017, Ohio EPA notified Respondent that the violation referenced in Finding No. 26.e. of these Orders was resolved when Respondent notified Ohio EPA on September 28, 2017, that it was no longer mixing hazardous wastes in the tanks as described in Findings Nos. 5. and 28. of these Orders.
30. The Director has determined there is no further action required of Respondent with regard to the violation of ORC § 3734.02(F) referenced in Finding No. 14.a. of these Orders.
31. Because Respondent will continue to use the less than ninety-day accumulation

area where the filter cake was stored for the accumulation and storage of hazardous waste filter cake, because no releases of hazardous waste were observed, the Director has determined that no additional action is required of Respondent at this time regarding the ORC § 3734.02(E) and (F) violation referenced in Finding No. 19.a. of these Orders.

32. Because no releases of the chromium hazardous waste were observed outside the building on the concrete pad, and the pad was of good structural integrity, the Director has determined that no additional action is required of Respondent at this time regarding the ORC § 3734.02(E) and (F) violation referenced in Finding No. 19.b. of these Orders.

V. ORDERS

Respondent shall achieve compliance with Chapter 3734. of the ORC and the regulations promulgated thereunder according to the following compliance schedule:

1. Within 30 days of the effective date of these Orders, Respondent shall submit documentation to Ohio EPA showing that all wastes generated at the Facility have been adequately evaluated in compliance with OAC rule 3745-52-11. This includes, at a minimum, all Sealer Baths (bath 1 on both the large and small Zinc Lines and bath 2 on the Phosphate Line), the Hexavalent Yellow Chromate Bath (bath 5 on the large Zinc Line), and the Oil Bath (bath 1 on the Phosphate Line). Approval of this documentation by Ohio EPA will resolve the violation referenced in Finding No. 23. of these Orders.
2. Within 90 days of the effective date of these Orders, Respondent shall submit documentation demonstrating compliance with Ohio's hazardous waste tank standards in OAC rules 3745-66-90 to 3745-66-99 for the two 2,500-gallon tanks. Approval of this documentation by Ohio EPA will resolve the violations referenced in Findings Nos. 26.a., 26.b., 26.c. and 26.d. of these Orders.
3. Respondent shall pay Ohio EPA the amount of \$13,200.00 in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 3734. and which will be deposited into the environmental protection remediation fund established pursuant to ORC § 3734.281 pursuant to the following schedule:

- a. Within 30 days after the effective date of these Orders, Respondent shall pay to Ohio EPA the amount of \$3,300.00;
- b. Within 60 days after the effective date of these Orders, Respondent shall pay to Ohio EPA the amount of \$3,300.00;
- c. Within 90 days after the effective date of these Orders, Respondent shall pay to Ohio EPA the amount of \$3,300.00; and
- d. Within 120 days after the effective date of these Orders, Respondent shall pay Ohio EPA the amount of \$3,300.00.

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 check 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.

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
Northwest District Office
Division of Environmental Response and Revitalization
347 North Dunbridge Road
Bowling Green, Ohio 43402
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:

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 closure of the hazardous waste management units identified in Findings Nos. 22.a. and 22.b. of these Orders and 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 any final action of the Director regarding closure or corrective action. Ohio EPA and Respondent each reserve all 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 closure of the hazardous waste management units identified in Findings Nos. 22.a. and 22.b. of these Orders and corrective action at the Facility, which rights 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.

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



Craig W. Butler
Director

IT IS SO AGREED:

Strategic Quality Consulting, Inc. dba A&L Metal Processing



Signature

4/13/18

Date

Bob Ridoux

Printed or Typed Name

Plant Manager

Title

Ohio EPA Invoice/Receipt

Date Printed: April 10, 2018

Revenue ID: 1221708

Please include this Revenue ID with all correspondence.

Place ID: 13238

Information: A & L Metal Processing
1920 George St
Sandusky, OH 44870-

Due Date: **May 09, 2018**

Amount Due: **\$3,300.00**

Effective Date: April 09, 2018

Revenue Description: DHWM- Findings and Orders - hazardous waste cleanup

Program Name: RCRA C - Hazardous Waste

Reason: Settlement of Ohio EPA's claims for civil penalties - A&L Metal Processing, 1 of 4 payments

For some Revenues, Interest and/or Penalties may be charged for late payment.

Next Interest Date (if applicable):

Next Penalty Date (if applicable):

Remittance Advice

Detach Here - Please Return This Portion With Your Payment

Place ID: 13238

Information: A & L Metal Processing
1920 George St
Sandusky, OH 44870-

Due Date: **May 09, 2018**

Amount Due: **\$3,300.00**

Secondary Type/Id: RCRA / OHD987023876

Revenue Type: FFOHW

Amount Enclosed: \$ _____

Many Ohio EPA fee invoices are payable online. For online credit card or ACH payment, go to <https://eBiz.epa.ohio.gov>, login or create an account and from the "Available Services" window choose "Pay Ohio EPA Fees Online".

Please write this number on your check. Revenue ID: 1221708

Make check or money order payable to "Treasurer, State of Ohio"

Remit to: Ohio Environmental Protection Agency - OFA
Department L-2711
Columbus, OH 43260-2711

For Ohio EPA use only

Check ID: _____

Check Date: _____

Check Number: _____

Check Amount: \$ _____

330000

FFOHW 1221708

Ohio EPA Invoice/Receipt

Date Printed: April 10, 2018

Revenue ID: 1221709

Please include this Revenue ID with all correspondence.

Place ID: 13238
Information: A & L Metal Processing
1920 George St
Sandusky, OH 44870-

Due Date: June 08, 2018

Amount Due: \$3,300.00

Effective Date: April 09, 2018

Revenue Description: DHWM- Findings and Orders - hazardous waste cleanup

Program Name: RCRA C - Hazardous Waste

Reason: Settlement of Ohio EPA's claims for civil penalties - A&L Metal Processing, 2 of 4 payments

For some Revenues, Interest and/or Penalties may be charged for late payment.

Next Interest Date (if applicable):

Next Penalty Date (if applicable):

Remittance Advice

Detach Here - Please Return This Portion With Your Payment

Place ID: 13238

Information: A & L Metal Processing
1920 George St
Sandusky, OH 44870-

Due Date: Jun 08, 2018

Amount Due: \$3,300.00

Secondary Type/Id: RCRA / OHD987023876

Revenue Type: FFOHW

Amount Enclosed: \$ _____

Many Ohio EPA fee invoices are payable online. For online credit card or ACH payment, go to <https://eBiz.epa.ohio.gov>, login or create an account and from the "Available Services" window choose "Pay Ohio EPA Fees Online".

Please write this number on your check. Revenue ID: 1221709

Make check or money order payable to "Treasurer, State of Ohio"

Remit to: Ohio Environmental Protection Agency - OFA
Department L-2711
Columbus, OH 43260-2711

For Ohio EPA use only

Check ID: _____

Check Date: _____

Check Number: _____

Check Amount: \$ _____

330000

FFOHW 1221709

Ohio EPA Invoice/Receipt

Date Printed: April 10, 2018

Revenue ID: 1221710

Please include this Revenue ID with all correspondence.

Place ID: 13238

Information: A & L Metal Processing
1920 George St
Sandusky, OH 44870-

Due Date: July 08, 2018

Amount Due: \$3,300.00

Effective Date: April 09, 2018

Revenue Description: DHWM- Findings and Orders - hazardous waste cleanup

Program Name: RCRA C - Hazardous Waste

Reason: Settlement of Ohio EPA's claims for civil penalties - A&L Metal Processing, 3 of 4 payments

For some Revenues, Interest and/or Penalties may be charged for late payment.

Next Interest Date (if applicable):

Next Penalty Date (if applicable):

Remittance Advice

Detach Here - Please Return This Portion With Your Payment

Place ID: 13238

Information: A & L Metal Processing
1920 George St
Sandusky, OH 44870-

Due Date: Jul 08, 2018

Amount Due: \$3,300.00

Secondary Type/Id: RCRA / OHD987023876

Revenue Type: FFOHW

Amount Enclosed: \$ _____

Many Ohio EPA fee invoices are payable online. For online credit card or ACH payment, go to <https://eBiz.epa.ohio.gov>, login or create an account and from the "Available Services" window choose "Pay Ohio EPA Fees Online".

Please write this number on your check. Revenue ID: 1221710
Make check or money order payable to "Treasurer, State of Ohio"

Remit to: Ohio Environmental Protection Agency - OFA
Department L-2711
Columbus, OH 43260-2711

For Ohio EPA use only

Check ID: _____
Check Date: _____
Check Number: _____
Check Amount: \$ _____

330000

FFOHW 1221710

Ohio EPA Invoice/Receipt

Date Printed: April 10, 2018

Revenue ID: 1221711

Please include this Revenue ID with all correspondence.

Place ID: 13238

Information: A & L Metal Processing
1920 George St
Sandusky, OH 44870-

Due Date: August 07, 2018

Amount Due: \$3,300.00

Effective Date: April 09, 2018

Revenue Description: DHWM- Findings and Orders - hazardous waste cleanup

Program Name: RCRA C - Hazardous Waste

Reason: Settlement of Ohio EPA's claims for civil penalties - A&L Metal Processing, 4 of 4 payments

For some Revenues, Interest and/or Penalties may be charged for late payment.

Next Interest Date (if applicable):

Next Penalty Date (if applicable):

Remittance Advice

Detach Here - Please Return This Portion With Your Payment

Place ID: 13238

Information: A & L Metal Processing
1920 George St
Sandusky, OH 44870-

Due Date: Aug 07, 2018

Amount Due: \$3,300.00

Secondary Type/Id: RCRA / OHD987023876

Revenue Type: FFOHW

Amount Enclosed: \$ _____

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Please write this number on your check. Revenue ID: 1221711

Make check or money order payable to "Treasurer, State of Ohio"

Remit to: Ohio Environmental Protection Agency - OFA
Department L-2711
Columbus, OH 43260-2711

For Ohio EPA use only

Check ID: _____

Check Date: _____

Check Number: _____

Check Amount: \$ _____

330000

FFOHW 1221711