



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 4, 2019

Ed Ehler & Florence Lovric
Lovric's Sea-Craft Inc.
3022 Oakes Ave.
Anacortes, WA 98221

**RE: Delinquent Dangerous Waste Compliance Certificate
Dangerous Waste Compliance Inspection at Lovric's Sea-Craft Inc. on May 10,
2019
EPA/State ID Number: WAR000003616**

Dear Ed Ehler and Florence Lovric:

A dangerous waste compliance inspection was conducted at your facility on May 10, 2019 to determine compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC). These regulations establish a system for safe and responsible management of dangerous waste.

During the inspection on May 10, 2019 several areas did not comply with the Dangerous Waste Regulations at Lovric's Sea-Craft. The areas not in compliance were provided to you in the Compliance Report mailed on June 21, 2019. I conducted a second inspection September 10, and noted progress in some areas; however, Lovric's has not completely addressed some items. The areas of non-compliance specified were (refer to June 21, 2019 inspection report):

Item 1: WAC 173-303-170(2)(a)(i)(A): Any person who generates a solid waste must determine if their solid waste designates as a dangerous waste or extremely hazardous waste according to WAC 173-303-070.

- Spent sandblast media – sampled and tested for leachable RCRA eight metals, plus copper, nickel and zinc. All concentrations passed for federal toxicity limits.

Action required – total metals analysis (your contracted laboratory, Edge Analytical stated they had completed this analysis and sent Lovric's a report but that report has not been provided to me), or fish bioassay to determine WA state toxicity.

- Marine railway – pressure wash water sampled and tested for total concentrations of RCRA eight metals, plus copper, nickel, zinc, and passed. No further action needed.

- Marine railway - pressure wash sludge (aka barnacles) - passed for leachable metals. *Action required* - awaiting results from total metals analysis (Edge Analytical stated they had sent Lovric's results for this analysis).
- Paint room – this shed is organized and wastes are in secondary containment trays.
Action required – An inventory list of wastes plus designation for these wastes using analytical data or generator knowledge based on published safety data sheets or other research. If some wastes have been disposed of provide documentation or a statement.
- Zep lubricant – no information provided.
Action required – is this product or waste? If waste, is it dangerous waste?
- Ten five-gallon containers in the East building are now in secondary containment trays and considered useable product. No further action needed.

Items 2 – 7: Universal Waste Lamps, Lead-Acid Batteries, Used oil and Spent Antifreeze (refer to inspection report):

Action required - Statements or documentation noting actions taken.

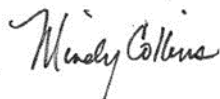
You were required to correct these items of non-compliance within the specified timeframes and to return the Compliance Certificate by July 22, 2019. Lovric's was granted two extensions, with the last deadline being August 31, 2019. As of the date of this letter, Ecology has not received your returned compliance certificate.

Please submit the Compliance Certificate portion of the Compliance Report, along with any requested documentation, to Mindy Collins at minc461@ecy.wa.gov by October 20, 2019 so that our records properly reflect your compliance status.

Failure to correct the areas that were out of compliance may result in the issuance of an administrative order, a penalty, or both, as provided by the Hazardous Waste Management Act (RCW 70.105.080 and/or .095). Persons who fail to comply with any provision of this chapter are subject to penalties of up to ten thousand dollars per day per violation.

You may contact me at (360) 255-4383 or minc461@ecy.wa.gov if you have questions or need further information.

Sincerely,



Ed Ehler & Florence Lovric
October 4, 2019
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Lovric Sea-Craft
RCRA Site ID: WAR000003616
Inspection Date: May 10, 2019

Mindy Collins
Hazardous Waste Compliance Inspector
Hazardous Waste and Toxics Reduction Program

Sent by email: Ed Ehler/Florence Lovric; lovricseacraft@gmail.com