



## ACTON BOARD OF HEALTH

Douglas Halley  
Health Director

472 Main Street  
Acton, MA 01720

Telephone 978-264-9634  
Fax 978-264-9630

Owner of Record  
MacKinnon Printing  
6 Ledge Rock Way  
Acton, MA 01720

August 6, 2008

Hello Mr. MacKinnon,

After review of the information you provided, the Acton Health Dept. is prepared to move forward without fining.

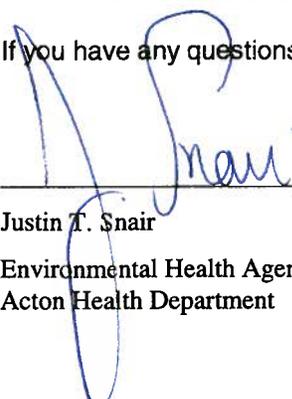
A change in practice will be required for your site in regards to the lubricating oil storage and disposal. The following actions will be required:

1. Use of absorbent spills pads (instead of shop rags) in oil catch-basin
2. Use of a 55 Gallon drum as a storage area for the oil contaminated absorbent pads. Drum will be labeled with "Hazardous Waste" and "Waste Absorbent Pads"
3. Disposal of Absorbent Pads must be documented on Uniform Waste Manifest (similar to ink disposal records) with estimate of weight or quantity, date of disposal etc.
4. Drafting a Spill Prevention and Management Plan, describing the rate in which oil accumulates in oil catch-basin and a schedule for removal/disposal of contaminated absorbent pads.

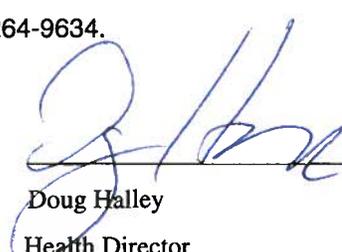
The aforementioned actions will prevent the overfilling of the catch-basin and provide the required evidence of proper disposal of wastes in the future.

Waste manifests will be retained for 3 years on site. Waste absorbent pads will be considered dry waste and 110% secondary containment will not be required for storage drum.

If you have any questions, please contact me at (978) 264-9634.

  
Justin T. Snair

Environmental Health Agent  
Acton Health Department

  
Doug Halley

Health Director  
Acton Health Department



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July 22, 2008

### To Whom It May Concern:

It has been found during an annual Hazardous Materials Control Bylaw inspection that the Owner of Record of 6 Ledge Rock Way, Acton, MA 01720 is not in compliance with the conditions described within the current Hazardous Materials Control Bylaw permit and/or Hazardous Materials Control Bylaw regulations.

The processes described for the disposal of machine lubricating oil used on site and a lack of Uniform Waste Manifests detailing proper disposal of the material constitutes an abnormal loss of an unknown quantity of hazardous material/waste within the Town of Acton.

Additionally, the neglectful storage and disposal practices of the machine lubricating oil has resulted in the overfilling of the provided spill containment and constitutes a release of hazardous materials within the Town of Acton.

### Violations

#### 2.3

*Owners or operators shall immediately report any discharge or abnormal loss of hazardous materials or waste and shall provide a reasonable estimate of the nature and quantity of the discharged hazardous materials or wastes...*

#### 2.4.1

*Any discharge of hazardous material or waste shall be immediately contained and reported...*

#### 3.5.1 f.

*Hazardous Waste shall be held on the premises for removal by a licensed carrier in accordance with the Massachusetts Hazardous Waste Management Act, MGL Chapter 21C.*

#### 3.7

*Throughout the permit period, owners, users, generators, or operators shall keep copies of all Hazardous Waste Transport Manifests on-site, as required under the Resource Conservation and Recovery Act 42 U.S.C., Section 6901 et seq. and the Massachusetts Hazardous Waste Management Act MGL Chapter 21C, 315 CMR, Section 2.04. If a hazardous waste generator is exempt from the manifest requirements sufficient proof of a proper disposal method shall be maintained.*

## Penalty

### 6.7 Penalty

*Any person who violates any provision of this bylaw shall be punishable by a fine of not more than \$300.00, as allowed under MGL Chapter 40, Section 21. Each day during which a violation continues shall constitute a separate offense, and each condition of this bylaw violated shall constitute a separate offense. This penalty may be imposed by the Town of Acton Board of Selectman, or a designated officer having police powers pursuant to MGL. Chapter 40, Section 21D.*

Total Penalty: \$1200.00

Additionally, the establishment of hazardous materials handling, storage and disposal practices in conformance with local, state, and federal regulations will be required.

Please correct the violations listed above, schedule a reinspection of the site with an Acton Health Inspector and remit payment of penalty to the office of the Acton Board of Health within 14 days of receipt of this letter. Failure to comply will result in additional fines and/or revocation of Hazardous Materials Control Bylaw permit.

You have the right to request an appeal hearing before the Acton Board of Health. Any appeal request must be received, in writing, with in fourteen (14) days of receipt of this letter.

If you have any questions, please contact me at (978) 264-9634.



Doug Halley  
Health Director  
Acton Health Department







