



State of Ohio Environmental Protection Agency

FILE COPY

Handwritten initials

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P.O. Box 1049  
Columbus, OH 43216-1049

January 5, 2010

Mr. Jeff Sellers  
Tech International  
200 E. Coshocton Street  
Johnstown, OH 43031-1041

Re: Tech International  
Licking County, SQGOHD 004293569  
NOV-RTC

Dear Mr. Sellers:

Thank you for your assistance during my inspection visit to your facility in Johnstown, Ohio on December 18, 2009. Thanks also for the followup information received from you by email that afternoon. The purpose of the inspection was to review your facility's generation and management of hazardous waste and used oil. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code, establish a system for safe and responsible management of these wastes. This letter summarizes the inspection findings.

Just one violation was noted, and has now been resolved:

1. **Emergency Equipment Inspections, OAC rule 3745-<sup>65</sup>~~68-33~~**: Emergency equipment must be inspected/tested as necessary to ensure its proper operation.

Monthly inspection log tags on an eyewash and two fire extinguishers in the Receiving Building indicated inspections had not been conducted since August and September of 2009.

*This has been resolved as of 12/18/09. The inspections have been performed and the tags are now current again. We discussed adding this to the hazardous waste container area weekly inspection log as an extra double-check measure.*

Two comments/suggestions are also offered at this time:

- Minimal hazardous waste was present on site at the time of my inspection due to a shipment made earlier that morning. However, the hazardous waste recordkeeping and general housekeeping and conditions of those containers that were present, are all consistent with a generally good compliance effort, which is appreciated at this facility.
- We discussed how to ensure used oil filters are properly drained by puncturing the dome ends. We also discussed that commercially available equipment can be utilized to safely puncture and drain any contents from used aerosol cans. Once the cans are emptied and free of pressure, they may be recycled as scrap metal.

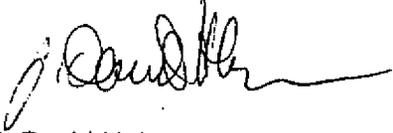
Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director



Mr. Jeff Sellers  
Tech International  
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Thank you again for your time and efforts toward hazardous waste compliance; please don't hesitate to contact me now or in the future with any questions regarding such matters, at (614) 728-3885.

Sincerely,



J. David Hohmann  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

c: Kristina Dumell--DHWM/CO  
CDO File

JDH/nsm      Tech 09 NOV-RTC

Notice: Ohio EPA's failure to list specific deficiencies/violations in this letter does not relieve your company from having to comply with all applicable regulations.

# SMALL QUANTITY GENERATOR REQUIREMENTS

## COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

*E: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.*

Safety Equipment Used: Steel toed boots, safety glasses

### GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
4.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator accumulate hazardous waste? <b>RMK: Two hazardous waste streams, approx. 2 drums per month.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the generator accumulated hazardous wastes <u>in excess of (180/270) days</u> without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator treat hazardous waste in a: <b>RMK: N/A, No treatment was being done on site.</b>	

### MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)] <i>N/A.</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] <b>RMK: All hazardous waste goes to Chemtron now.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

### PREPAREDNESS AND PREVENTION

17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
	a. Name and telephone number of emergency coordinator?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Telephone number of local fire department?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] <b>RMK: a flash fire involving solvent product in the cement building in fall of 2008 caused by static discharge, was responded by the Fire Department, and preventive steps were taken afterwards to upgrade the grounding in the area.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	
a.	Internal Alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)] <i>RMK: P.A. System</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
23.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] <i>RMK: Tags on eyewash and fire extinguishers were not current in the receiving building, near the central accumulation area. However the equipment was found to be properly operational and the inspections were brought back up to date to fix this problem.</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (unless not required under OAC 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>SATELLITE ACCUMULATION AREA REQUIREMENTS</b>		
29.	Does the generator ensure that satellite accumulation area(s):	
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
30.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? <i>RMK: At the time of the inspection, very little hazardous waste was in accumulation on site. A shipment had been made just that morning to Chemtron. If so:</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>USE AND MANAGEMENT OF CONTAINERS</b>		
31.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is the accumulation date on each container? [3745-52-34(D)(4)] <i>RMK: Just a partially full labpack drum remained in the central accumulation area,</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	<i>with a December 18, 2009 date marked on it.</i>	
33.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74] <i>RMK: These records were received via pdf email later the same afternoon.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>PRE-TRANSPORT REQUIREMENTS</b>		
38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Before off-site transportation, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

# GENERATOR LDR CHECKLIST

**DOES NOT APPLY TO CESQGS**

## GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Is the form kept on file for three years after the last HW of this type was shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

## NOTIFICATION FORM

11. Does the LDR Notification form contain the following information:		
a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Not required if the waste is high TOC D001.*

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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## PROHIBITED DILUTION

12.	Is the HW treated by burning? If "No," go to #15.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Is the HW a metal-bearing HW? (RMK: #14 = N/A)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
15.	Was the HW treated by wastewater treatment? (RMK: #15a-c = N/A)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: If Yes, HW is improperly being treated by dilution.*

**GENERATOR TREATMENT** [N/A, no on-site treatment]

**NOTIFICATION FORM** [N/A, no on-site treatment]

# USED OIL INSPECTION CHECKLIST

## GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

### PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes: N/A	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

### GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Does the generator of used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] <i>RMK: No releases. Containers were indoors, in good condition.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**ON-SITE BURNING IN A SPACE HEATER** N/A

### GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator:	
a.	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of the used oil at any one time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID number if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).*

**COLLECTION CENTERS AND AGGREGATION POINTS** N/A



# **DHWM-CDO Hazardous Waste Compliance Inspection Report**

## **Site: Tech International, Inc.**

**Inspection Date:** 12/18/2009    **RCRA ID#:** OHD 004293569    **Site Contact:** Jeff Sellers  
Phone (740) 967-9015

**Location:** 200 E. Coshocton St., Johnstown, OH 43031-1041

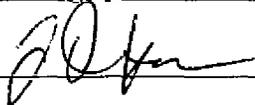
**Operation at this location since:** 1940s    **Generator/Site Status:** SQG (at time of inspection)

## **OEPA**

**Lead Contact:** J. David Hohmann, CDO DHWM

**Contact Phone:** (614) 728-3885    **Email:** david.hohmann@epa.state.oh.us    **FAX:** (614) 728-3898

**Report By:** JDH    **Report Date:** 12/29/09

 12-30-09 (Signed)(Date)

## Background:

Tech International employs some 175 employees at this facility (down from 220 five years ago). Operations have been consolidated from two shifts into one. They manufacture repair kits including patches, plugs and adhesives which are used to fix tires and inner tubes, conveyor belts, etc. Much of the work is labor intensive involving cutting and sorting and assembling kits in boxes. The facility consists of 7 to 10 buildings scattered around a site area of 4 to 5 acres. It is the largest manufacturer of its type in the world.

A hazardous waste generator number was first issued for this facility sometime in the 1980s. The first records relating to at this facility in DHWM-CDO RCRA compliance files concerned a solvent release from product aboveground storage tanks, which was addressed in 1989. Ignitable solvent product still continues to be stored in outdoor diked aboveground storage tanks at this facility. Since from 1996 to 2004, the facility reported as LQG. The most recent previous RCRA compliance inspection was in 2004.

## Inspection Summary:

Upon arriving at 11:45 AM, I met Jeff Sellers, the environmental contact person and safety coordinator. I signed in and got a visitor badge at the front desk. Jeff explained that he was working a partial day schedule that day, and I was lucky to have caught him there! He agreed to help me with my inspection and we proceeded without any lunch break so that he could be done sooner.

## **Records Review**

Manifest and LDR records were well organized and complete, with no apparent deficiencies noted. UHCs were identified on the LDR for all but the D002 waste, which made sense. The terms of the LDR notifications appeared to be accurate in each case I reviewed.

Mr. Sellers said that a batch shipment of hazardous waste in drums had been made just that morning. All wastes were being taken to Chemtron's TSD facility in Avon, Ohio. The manifest included 5 drums (265 gallons) of D001, d035, F003, F005 ignitable liquid spent solvent waste; one drum of waste sodium hydroxide (D002), and 4 drums of paint rollers with adhesives (D001, D035, F003, F005), plus one drum of expired solvent product with TCE (D040). In addition were 720 lbs. of waste fluorescent light bulbs, 375 gallons of waste non-hazardous baghouse dust, 2400 lbs. of electronic equipment waste for recycling (monitors and computers), plus 6500 lbs. of waste rubber patches for destructive shredding disposal, and 55 gallons of an aqueous cleaner called WIP Whitewall.

Previous shipments of similar batch amounts had been made on August 13, 2009 and in April of 2009. The waste amounts and frequency were well within the 180 day allowance for SQGs.

Required weekly container area inspections were being conducted and recorded. Required inspections of emergency equipment were also being documented. The monthly inspection record tags for fire extinguishers and eyewash in the Receiving Building (near the hazardous waste central accumulation area) were out of date, missing notations since 9/09 and 8/09.



Emergency phone numbers were posted near the phones in the office area. Workers carried cellphones and/or radios to communicate when on site. There was also a public address system for use if needed.

### **Site Tour**

The Press Room included heated steam presses. Paper wipers from cleaning the equipment were being collected and disposed of as hazardous waste along with spent adhesive rollers.

The Mill Room involved mixing and bonding rubber from slabs that were warmed, softened and cut/worked to the desired consistency. Rolling and cutting of sheets and rolls was accomplished in a Slitter Room. A mold cleaning dip tank contained a batch of about 100 gallons of sodium hydroxide cleaning solution that was periodically generated as spent material on about an annual basis.

Aboveground storage tanks outside in a diked area contained xylene and petroleum solvent that was used in cement mixing and formulation. These tanks held about 10,000 gallon capacity.

The Cement Department was not operating on the day of my visit due to a schedule that runs from Monday through Thursdays. This area included mechanized mixing and tanks up to 1,000 gallons each. A satellite accumulation drum in this area held QC sample waste with TCE solvent in it. It was properly marked and well managed, with a secured flip-lid screw-in funnel.

The Hazardous Waste Central Accumulation Area was in a cage in the receiving building. Since a shipment had just been picked up that morning, it was almost empty. A partially full labpack drum dated 12-18-09 was all that remained there. A spill kit was present in the area, and some empty containers for waste lamps.

The Mixing Building included raw rubber blocks and powdered carbon black, zinc, silica crystals and sulfur that were used to make batches of rubber for patching materials. Steam vulcanizing cures the rubber in its final form.

A maintenance department included a Zep parts washer with Dyna 143 solvent (outside the 140 F flashpoint limit for hazardous waste). Spent solvent was being managed as used oil. About 110 gallons of used oil was being generated annually from forklift maintenance or press leak repairs. These containers were properly marked.

We discussed procedures for properly hot-draining used oil filters (and puncturing of the dome end). We also discussed proper aerosol can waste management practices, and I mentioned some commercially available devices that can safely and protectively puncture and drain them into a drum.

An short outbriefing meeting was held with the company president, Les Wofford. I thanked him and Jeff for their time and assistance, and left the site at 1:25 PM.

Mr. Sellers promised to send me copies of weekly container inspection log records and did so about half an hour after my departure from the facility. No problems with those records were identified. He also included an updated inspection tag for the fire extinguisher by the central accumulation area, with a December 18, 2009 inspection recorded (to resolve that one violation).

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

**Facility Name:** Tech International

**Facility Type:** SQG

**EPA ID#:** OHD 004293569

### Description of Waste

### On-Site Management

### Off-Site Management

Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, etc)</small>	Waste Generated <small>(e.g. sludge, spent solvent, ash, etc)</small>	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage <small>(e.g. container, tank, etc)</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Waste Location <small>(Include map if possible)</small>	Name, state, and type of activity occurring at the facility.
1 Quality Control Testing Samples	waste leftover samples	D001, D035, F003, F005	55 gal.	55-gallon drum, +/- labpack if needed.	not treated	Cement Room. Also Central Accumulation area, located in secured area within the Receiving Building,	Chemtron, (Avon OH) storage and shipment for disposal
2 Sorting of unused product Returns from Customers	waste unusable products						
3 Mixing equipment maintenance	Spent rollers and wipers with solvent and adhesives	D001, D035, F003, F005	55 gal.	55-gallon drum		Press Room	
4 Equipment maintenance	used oil	n/a	10 gal.	55-gallon drum		Maintenance Dept.	Picked up for used oil recycling by unnamed company
5 lighting maintenance	fluorescent lamp tubes	n/a byproduct	~10 tubes	fiber container		central accumulation area	Chemtron, (Avon OH) storage and shipment for recycling
6 air pollution control for the mixing building process vents	baghouse dust	n/a	2 drums.	55-gallon drum		baghouse area	Chemtron, (Avon OH) storage and shipment for disposal (to Solid Waste Landfill)
7 air compressor operation	Oily water condensate liquid	n/a	2 drums	55-gallon drum		Compressor shed	Picked up for used oil recycling by unnamed company